COMMENTS AND RESPONSES VOLUME

FINAL ENVIRONMENTAL IMPACT REPORT

MILL VALLEY MIDDLE SCHOOL RECONSTRUCTION PROJECT

December 2025

SCH#
2024060669

Prepared for:

Mill Valley School District
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Prepared by:

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Vollmar Natural Lands Consulting
Solano Archaeological Services
PHA Transportation Engineering

TABLE OF CONTENTS

	Page
Chapter 1. Introduction	**1**
A. Purpose of the Final Environmental Impact Report	1
B. Report Organization	1
Chapter 2. List of Persons Commenting	**3**
A. Written Comments	3
B. Oral Comments	14
Chapter 3. Comments and Responses	**16**
A. Introduction to Comments and Responses	16
B. Master Responses	16
C. Written Comments and Responses	30
D. Oral Comments Presented on September 10, 2025 School Board Meeting	675
Chapter 4. Text Changes to the Draft EIR	**679**
A. Revisions to Alternative 5 Analysis	679
B. Tribal Cultural Resources Chapter	690
C. Revised Hazards, Hazardous Materials, and Wildfire Chapter	600
D. Minor Text Changes	723

Appendices

Appendix A. Transcript of DEIR Public Comment Meeting Comments

Appendix B. PHA Transportation Analysis Responses and Corrections

Appendix C. Alternative 5 Air Quality and Noise Technical Reports

Appendix D. Updated Proposed Project Human Health Risk Assessment (HHRA)

Appendix E. PEA and HHRA Tables for Renovation Alternative

Appendix F. Mill Valley Middle School Modernization Mess Comment Letter Supporting Documents

Appendix G. Mitigation Monitoring and Reporting Program

CHAPTER 1
INTRODUCTION

A. PURPOSE OF THE FINAL ENVIRONMENTAL IMPACT REPORT

The Mill Valley Middle School Reconstruction Project Draft Environmental Impact Report (DEIR) (SCH #2024060669) was released for public and agency review and comment from September 2, 2025 through October 20, 2025. The Draft EIR was made available to responsible agencies, trustee agencies, state agencies with jurisdiction by law, and interested parties and individuals. After completion of the public review period, the California Environmental Quality Act (CEQA) requires the Lead Agency to respond to significant environmental issues raised in the public and agency review process. The Lead Agency for the EIR is the Mill Valley School District (district).

The District held a public meeting at the Mill Valley School District Board Meeting on September 10, 2025 at 5 p.m., to receive verbal comments on the Draft EIR. This document has been prepared to compile and respond to agency and public comments received on the Draft EIR. Together with the Draft EIR, this document constitutes the Final EIR for the project.

The Final EIR is an informational document prepared by the Lead Agency that must be considered by decision-makers before approving or denying a proposed project. As specified in CEQA Guidelines (Section 15132), the Final EIR shall consist of (a) the Draft EIR or a revision of the Draft; (b) comments and recommendations received on the Draft EIR either verbatim or in summary; (c) a list of persons, organizations, and public agencies commenting on the Draft EIR; (d) the responses of the Lead Agency to significant environmental points raised in the review and consultation process; and (e) any other information added by the Lead Agency.

B. REPORT ORGANIZATION

Chapter 2 of this document contains a list of persons who submitted written comments, and a list of persons who provided oral comments at the public meeting held on September 10, 2025. Chapter 3 of this document contains copies of written comments and oral comments received during the comment period and responses to those comments. Several issues were addressed by multiple commenters and are answered by “Master Responses,” which consolidate information on the subjects to ensure a more comprehensive response. Each comment is numbered in the margin of the comment letter. Responses to all written comments are found in the page immediately following the letter. The written comments and responses are referenced by letter and, if applicable, comment number.

Chapter 4 of this document contains changes to the Draft EIR. Text changes to the DEIR are shown in underline for additions and ~~strikethrough~~ for deletions. Text changes are organized sequentially according to the page in the Draft EIR on which the text is changed.

Consistent with Pub. Res. Code Section 21092.5, responses to agency comments will be provided to each commenting agency at least 10 days prior to the certification of the EIR.

The Final EIR is available for review in-person at the Mill Valley School District offices, 411 Sycamore Avenue, Mill Valley, CA 94941 or the Mill Valley Public Library, 375 Throckmorton Avenue, Mill Valley, CA 94941. The document and references are also available electronically on the District website at https://www.mvschools.org/facilities-modernization.

CHAPTER 2

LIST OF PERSONS COMMENTING

A. WRITTEN COMMENTS

A list of persons that provided written comments on the Draft EIR is provided in **Tables C&R-1** (agency comments) and **C&R -2** (individual comments).

TABLE C&R-1. LIST OF AGENCY COMMENTERS ON THE DRAFT EIR

Letter ID	Agency
1	California Department of Fish and Wildlife
2	Sewerage Agency of Southern Marin
3	City of Mill Valley
4	California Department of Toxic Substances Control
5	Marin County Environmental Health Services
6	Southern Marin Fire District

TABLE C&R 2. INDIVIDUAL AND ORGANIZATION WRITTEN COMMENTS ON THE DRAFT EIR

Letter ID	Commenter	Page
1	Fabia Butler	79
2	Anita Forbes	80
3	Leslie Ciitroen	82
4	Benson Kaukonen	83
5	Harry and Bigitte Smith	85
6	Alex and Robert Duvall	86
7	Mark Steiner	88
8	Laura Schierberl	89
9	Gus and Arlene Fiume	91
10	Liz Davis Toth	93
11	Michael Cool	95
12	Leatitia Comps Agrar	96
13	Lisa Klann	98
14	Erin Davis	101
15	Sabrina Lo	102
16	Mario Viela	103
17	John Ezak	104
18	Meredith Brown	105
19	Mai Thai	108
20	Greg Hanggi	109
21	Saher Naderi	110
22	Dorsi Bonner	112
23	Max Wertheimer	114
24	Christopher Sanchez	117
25	Laura Belmont	118
26	Stephanie Abney	120
27	Mary Beth Todd	121
28	Darrell Gillmeister	123
29	Hilary Hyde	125
30	Jim Welte	126

Letter ID	Commenter	Page
31	Hilary Lazarus	127
32	Link Allen	128
33	Lucy Ross	129
34	Patty Robbins	131
35	David Speyer	133
36	Julianna Hayes	134
37	Patrick Siu	135
38	Melissa Jenkins	136
39	Sophia Harkins	137
40	Ruth Lehmann	140
41	Judith Harkins	141
42	Jane Colwell	142
43	Adrielle Sorano	143
44	Amaris Vicari	144
45	Zoe Kessler	145
46	Courtney DiCarlo	146
47	Kevin Malone	148
48	Javier Ordonez	149
49	Juliette Lachica	151
50	Deepa Ramachandran	152
51	Todd Dunphey	153
52	Catherine Tai	154
53	Maria Sil	156
54	Nancy Sigerman	157
55	Susan Wu	165
56	Todd Lieman	166
57	Ava Tomnay	167
58	Tajiha Dubin	168
59	Sean Dumlao	169
60	Krupa Antani	170
61	Caiden Barteau	171
62	Phillip Peng	172

Letter ID	Commenter	Page
63	Arjun Gupta	173
64	Jana Stryker	174
65	Michael Goodwin	176
66	Bob and Regina Canepa	177
67	Courtney Gaiman	178
68	Julia Gottleib	181
69	Greg Etemad	182
70	Francesca Malek	184
71	Cortney Oldt	187
72	Diana Guo	189
73	Mary Toth	190
74	Fia Modrich	191
75	April Green	192
76	Sita Ryan	193
77	Meenal Balar	194
78	Eliza and Kevin Lochner	195
79	Natalie Schaffer	196
80	Lauren Gebert	197
81	Justin Dolly	198
82	Jaki Chaparro	199
83	Matt Barkovich	200
84	Karie Brown	202
85	Diane Goldman	204
86	Jenna Freil	205
87	Stephanie Ryder	207
88	Jayli Miller	209
89	Catherine Moreno	210
90	Ben Wright	212
91	Stella Perone	213
92	Evelyn Fung Carlon	214
93	Sara Coan	215
94	Kerry Evdokimoff	216

Letter ID	Commenter	Page
95	Kim Obrien	217
96	Clifford McGuire	219
97	Joan Pata	220
98	Mythili and Krishna Devineni	223
99	Larry French	224
100	Julie Duryea	225
101	Theresa McGlashan	226
102	Helen Maguire	227
103	Ted Lee	228
104	Thais Nye Derich	229
105	Brad and Emma Tewksbury	230
106	Michael Cummins	233
107	Wendy Dalia	235
108	Anthony Dailley	236
109	Richard Davis	238
110	Lee Wilson	239
111	Corey Lydstone	240
112	Matt Coan	242
113	Ben O'Brien	243
114	Alexandra Mortenson	244
115	Catherine Provencal	245
116	Penni Gladstone	246
117	Alexa Shively	248
118	Ian Kenney	249
119	Brooke Simmons	251
120	Lois Campton	253
121	Lisa Barnes	254
122	Dana McQueen	255
123	Patricia Kettridge	256
124	Alia Al-Zand	259
125	Lois Ashley	260
126	Tiiu McGuire	261

Letter ID	Commenter	Page
127	Zara Forzley	262
128	Anne Deucher	264
129	Emmalee Schlager	265
130	Frances Engstrom	266
131	Nicole Palmer	267
132	Sarah Kelley	269
133	Shannon Gotham	270
134	Timothy Lemma	273
135	Maralee Burgard and Ernie Lafky	276
136	Bill Ryder	277
137	Pamela Keon	279
138	Pierce Bruxton	282
139	Bria Martin	283
140	Tanya Yatsuneko	284
141	Sarah Macdonald	285
142	Jessica Neil	286
143	Roger Carlon	287
144	Katy Sheppard	293
145	Alice Stolte	294
146	Lochlan McHale	295
147	Barbara Strick	296
148	Greg Moreau	297
149	Jill Bartok	299
150	Christina Meuller	300
151	Aaron Pribble	301
152	Ben Zelazny	302
153	Matthew Walker	304
154	Shaterra Davis	305
155	Shonquis Moreno	306
156	Jessica Le	309
157	Melissa Quigg	310
158	Tori Kaleta	311

Letter ID	Commenter	Page
159	Steve Richmond	314
160	Wilhelmina Peragine	316
161	Kathy Bush	317
162	Edward Rusky	319
163	Erica Potter Edelson	321
164	Todd Gates Comments	323
165	Anita Forbes (2nd comments)	331
166	Jasmine Bean	333
167	Robert Mithun	334
168	Conan Putnam	335
169	Tina Humphrey	337
170	Marti Grimminck	338
171	Tony Grimminck	340
172	Alex Johnson	343
173	Michael Scurich	344
174	Nicole Fitzpatrick	346
175	Julia Winn	347
176	Marci Furutani and Adrian Fernandez	349
177	Emily Maynard	350
178	Sasha Noller	351
179	Max Perkoff	353
180	Susan Mumford	355
181	Seneca Gupta	356
182	Heidi Arkinstall	357
183	Erica Desai	358
184	Kate Ellison	360
185	David Toomey	362
186	Peter Moeck	366
187	MVMS Modernization Mess	368
188	Ila and Matteo Marchetta	391
189	Charles Bush	393
190	Julie Baldocchi	394

Letter ID	Commenter	Page
191	Annie Schlabs	395
192	Christina Card Zbar	396
193	Scott Valley Homeowner Association	397
194	Scott Ellison	405
195	John Whitaker	407
196	abensco@aol.com	408
197	Preston Richardson	409
198	Dan Boley	410
199	Brooke Goodman	412
200	Liz Richmond	416
201	Rachel Reid Holbrook	418
202	Char and Ian Leary	420
203	Rebecca Stone	421
204	Wesley Caddell	422
205	Amy McCrea	424
206	Adam Reuter	426
207	Pierce Bruxton	427
208	Geoffrey Knopp and Fernanda Repsold	429
209	Sharon Callaghan	433
210	Lauren Snell	434
211	Peter Imlay	435
212	Mark Lutzker	438
213	Karen Jernstedt	440
214	Heather and Wade Schlueter	441
215	Dorian Grillet	442
216	Brittany Ye	443
217	Corrine Grillet	448
218	Benson Kaukenen	449
219	Marc Lester	450
220	Karolina Gachowska	451
221	George Caliendo	452
222	Laren Weitzman	453

Letter ID	Commenter	Page
223	Peter Luber	455
224	Quinn Rogers	456
225	Penny Kweder	458
226	Shanta Delacrose	460
227	Mark Simmons	461
228	Caitlin McSunas	463
229	Megan Harju	464
230	Fabien Renaud	465
231	Adrian James	468
232	Stuart Poole	469
233	Emily Buskirk	470
234	Steve and Dana Rieger	472
235	Sabrina Simon	474
236	Abigail Pease and Loren Siebert	477
237	Kara Merski	478
238	Brooklyn Beard	480
239	Carly Scholtz	482
240	Kathleen McCoy	483
241	Bella Kazwell	484
242	Chantal and Roger Carlon	488
243	Michael Broom	489
244	Naomi Goodman	491
245	Lilly Stamets and Wayne Moskow	493
246	Diane Wagner	494
247	Kailin McCracken	495
248	Adrienne Power	497
249	Andrew and Katey Hoffman	498
250	Tara Ordonez	500
251	Catherine Elder	501
252	Nathaniel Stone	502
253	Eva Ngarangad	503
254	Kally Ellis	504

Letter ID	Commenter	Page
255	Ellen Frazier	505
256	Larisa Tempero	506
257	Christina Ferrogiaro	507
258	Carl and Leigh von Rueden	508
259	Cindy McCauley	509
260	Danielle Miyasato	511
261	Teresa Joe	512
262	Bob Gunnell	513
263	Christy Atkisson	514
264	Liz Moriarty	516
265	Ron Soo Hoo	519
266	Anne Gates	520
267	Richard Ross	528
268	Allie Jant	529
269	Hayley Nelson	535
270	Michael McSunas	536
271	Mario and Christina Barrios	537
272	David and Erin Griffis	538
273	Bruce Botsford	538
274	America West After Care	543
275	Susan Parrott	545
276	James Beardon	546
277	David Lee	551
278	Susan Dawson	552
279	Jeramiah Atkisson	554
280	Cameron Weissensee	557
281	Miranda Lidl O'Connell	563
282	Clara and Tim Daniels	564
283	Michelle Passero	565
284	Tom Geidt	568
285	Thomas Wheatland	569
286	Amy Callinan	571

Letter ID	Commenter	Page
287	Trish Stevens	572
288	Bess Friday	573
289	Julia Abranson	575
290	Todd Gates (correction)	577
291	Sarah Toomey	582
292	Will Coddington	585
293	Nejat Duzgunes Comments	586
294	Lindsay Harris	588
295	Jen Conway	589
296	Sarah Cope	591
297	Aparajita Sohoni	592
298	Melissa Jenkins	593
299	Kate Roth	596
300	Kasia and Diego Meller	598
301	Raj Venkatesan	601
302	Andrew Antkowiak	603
303	KK Sample	605
304	Susan Flint	608
305	Sarah Lovitt	610
306	Greg Jenkins	611
307	Eric and Sterling Somers	613
308	Ward Pendarvis	616
309	Jess Pluskowski	617
310	Dayna Mullins	618
311	Carla Hackett	622
312	MVMS Modernization Mess Petition	623
313	Ben Fackler	628
314	Sarah Beard	630
315	Siddharth Vanchinathan/Unblock MVMS Modernization Petition	632
316	Jackson Beard	642
317	Candice Curtis	644

Letter ID	Commenter	Page
318	Hector Garcia	645
319	Carl Weissensee	646
320	Chris Peeler	648
321	Bria Ruben	649
322	Sarah Rayburn	652
323	Anita Sparks	654
324	Dusty Kenney	655
325	Boriana Fackler	657
326	Courtney Gaiman	661
327	Anna Lazzarini	663
3278	Charles Ziegler	667
329	Richard Kelly Rayburn	669
330	Paul Grana	672
331	Paige Martin	673
332	William Schmetterer	676

B. ORAL COMMENTS

A list of persons that provided oral comments on the Draft EIR at the DEIR Public Comment Meeting is provided in **Table C&R-3**

Table C&R 3- Oral Commenters at Public Comment Meeting		
Number	**Commenter**	
M-1	Ralf Modrich	675
M-2	Michael Goodwin	675
M-3	Kaiya Forzley	675
M-4	Chantal Carlon	675
M-5	Lara Zegart	675
M-6	Roger Carlon	675
M-7	Dr. Robin Adcock	675
M-8	Dusty Kenney	675
M-9	Cortney Oldlt	676
M-10	Tajjah Dubin	676

Table C&R 3- Oral Commenters at Public Comment Meeting		
Number	**Commenter**	
M-11	Susan Dawson	676
M-12	Michelle Passero	676
M-13	Christy Atkisson	676
M-13	Maggie Spillane	676
M-14	Alex Duvall	676
M-15	Brooke Simmons	676
M-16	Dorsi Bonner	677
M-17	Jackson Beard	677
M-18	Harper (no last name given)	677
M-19	Brooklyn Beard	677
M-20	Sarah Beard	677
M-21	Rebecca Stone	677
M-22	Michael Cool	677
M-23	Amy McCrea	677
M-24	Anita Sparks	677
M-25	Eliza Lochner	677
M-26	Leighton Lochner	678
M-27	Courtney Gaiman	678
M-28	Jeremy Revitch	678
M-29	Patty Robbins	678
M-30	Kelly Ellis	678
M-31	Douglas Nelson	678

CHAPTER 3
COMMENTS AND RESPONSES

A. INTRODUCTION TO THE COMMENTS AND RESPONSES

This chapter includes copies of the comment letters/emails received regarding the Draft EIR during the public comment period. Oral comments also were received during the public meeting and are summarized herein. Each comment letter/email is followed by responses to the comments. The responses focus on issues related to the adequacy of the Draft EIR in identifying and analyzing the possible environmental impacts of the Project and possible approaches for avoiding or mitigating these impacts. These comments will be considered by the District Board of Trustees as they decide whether to certify the EIR and approve the Project (or an alternative to the Project). Each written comment letter is assigned a corresponding letter of the alphabet and, for letters with multiple comments, the written comments are shown with numbered brackets that correlate to responses to the comments immediately following each written comment letter. Each oral comment is numerically assigned a corresponding number and is shown with numbered brackets that correlate to the responses to the oral comments. In the case of multiple similar comments, the response directs the reader to an applicable Master Response, which addresses a range of similar comments.

B. MASTER RESPONSES

Master Response 1: Comments on Project and Alternative Preferences

CEQA Guidelines Section 15088(a) requires the lead agency to "evaluate comments on environmental issues received from persons who reviewed the draft EIR and [] prepare a written response." CEQA Guidelines Section 15088(a) further mandates that the lead agency "respond to comments raising significant environmental issues received during the noticed comment period and any extensions and may respond to late comments."

A lead agency is not however required to consider comments that are not related to significant environmental issues including comments expressing or indicating a preference for or opposition to a project, elements of a project, or a project's alternatives. Comments related to the proposed project or elements of the project, as well as the project's merits, are generally not considered comments on issues related to physical environmental conditions or impacts disclosed and evaluated as part of the Draft EIR and, therefore, do not warrant a response under CEQA.

To the extent any comments expressing opinions on the project or its alternatives do not relate to significant environmental issues, no individual response will be provided, though such comments will be provided to the District Board of Trustees for their consideration in their project approval deliberations.

Master Response 2: Comments on West America Taekwondo Dojo

A number of oral and written comments were received on the importance of maintaining the West America Taekwondo Dojo and associated after-school programs that are currently housed in the Terra Marin School building. That building is proposed for removal in the alternatives that would locate either the interim or permanent middle school at the Edna Maguire/Terra Marin site. Some of the comments also noted the potential social impacts of the loss of the dojo at that location. Consistent with Master Response 1, these comments are noted and will be forwarded to the District Board of Trustees for their consideration in any project approval action.

As noted in Master Response 1, CEQA Guidelines Section 15088(a) mandates that the lead agency "respond to comments raising significant environmental issues received during the noticed comment period and any extensions and may respond to late comments." CEQA Guidelines Section 15382 defines a "[s]ignificant effect on the environment as "a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance." CEQA Guidelines Section 15382 further states that "[a]n economic or social change by itself shall not be considered a significant effect on the environment" though "[a] social or economic change related to a physical change may be considered in determining whether the physical change is significant."

There is no evidence of a physical change in the environment due to the removal of the West America Taekwondo Dojo's after-school programs currently housed in the Terra Marin School building. Accordingly, the comments relating to the West America Taekwondo Dojo do not raise significant environmental issues for which a comment response is required and therefore no changes to the EIR are required in response to such comments.

Such comments will however be provided to the District Board of Trustees for their consideration in any project approval action.

Master Response 3: Traffic and Parking Issues at Edna Maguire/Terra Marin Site

A number of oral and written comments were received regarding issues associated with traffic and parking congestion, including potential to impede emergency ingress/egress from the neighborhoods near the school, in the alternatives that would construct either a permanent or temporary school at the Edna Maguire/Terra Marin site (Alternatives 2, 3, and 4).

With respect to traffic congestion generally, Senate Bill (SB) 743 was signed by Governor Brown in 2013 and required the Governor's Office of Planning and Research (OPR) to amend the State

CEQA Guidelines to provide an alternative to Level of Service (LOS) methodology for evaluating transportation impacts. The LOS rating system was previously used in the past as a means of analyzing a project's potential traffic impacts based on traffic congestion and intersection backups at nearby intersections. SB 743 further specified that the new criteria for analyzing traffic impacts should promote the reduction of GHGs, the development of multimodal transportation networks and a diversity of land uses.

In response, Section 15064.3 was added to the CEQA Guidelines beginning January 1, 2019. Section 15064.3(c) states that the provisions of the section shall apply statewide beginning on July 1, 2020. State CEQA Guidelines Section 15064.3, (*Determining the Significance of Transportation Impacts*), states that Vehicle Miles Traveled (VMT) is the most appropriate measure of transportation impacts and provides lead agencies with the discretion to choose the most appropriate methodology and thresholds for evaluating VMT.

Following the adoption of SB 743 and the incorporation of CEQA Guidelines Section 15064.3, transportation impacts for purposes of CEQA are no longer analyzed by way of LOS methodology and are now instead analyzed through VMT. Therefore, an increase in traffic is no longer considered a transportation impact for purposes of CEQA.
In addition, parking impacts via parking shortages are considered social impacts and not environmental impacts for purposes of CEQA. (*San Franciscans Upholding the Downtown Plan v. City and County of San Francisco* (2002) 102 Cal.App.4th 656, 697.) Under CEQA, a project's social impacts need not be treated as significant impacts on the environment. (CEQA Guidelines Section 15382.)

To the extent any comments relate to traffic and parking and do not relate to significant environmental issues, no individual response need be provided, though such comments will be provided to the District Board of Trustees for their consideration in their project approval deliberations.

The discussion of such topics below is provided for informational purposes and to respond to some of the concerns raised in these comments.

Congestion During Normal School Operations

As described in Chapter 5 of the DEIR, the hours of the elementary and middle school would be staggered by either a half hour or 45 minutes to avoid aggravating existing congestion at the Edna Maguire site. In addition, the District has proposed a bus service from the existing Mill Valley Middle School site to the Edna Maguire/Terra Marin site if the interim housing or permanent school were to be constructed at the Edna Maguire/Terra Marin site.

As stated in the DEIR, pp. V-14 and V-15, while these measures would reduce peak congestion in the Lomitas Drive neighborhood, there would still be an increase in traffic at the entrance and exit driveways, and the duration of traffic congestion near the driveways would increase:

> "the traffic service levels at Lomita Drive and the school entrance and exit driveways would further worsen and there would be more parent parking spillover onto Lomita Drive neighborhood for the two school years that this interim campus would be present at that site. "

Further, as discussed on p. V-25 of the EIR:

> "With the added traffic from the middle school, traffic service levels at the school entrance and exit would drop to LOS E and F from LOS A with Edna Maguire Elementary School. Long vehicle queues can be expected on Lomita Drive creating problems for residential access in the area and blocking driveways. [1] The added traffic would add noticeable traffic to Lomita Drive, which is a residential street. While this would not necessarily result in hazardous conditions, it would impede neighborhood access during peak drop-off and pick-up times. However, hours of classes for the two schools would be staggered by half an hour or 45 minutes to reduce traffic congestion. This would eliminate most of the LOS degradation[2].
>
> It should be noted that the Marin County Department of Public Works is currently proposing a renovation program for Lomitas Drive that includes sidewalk extensions and other roadway improvements that would improve this situation[3].
>
> As indicated on current conceptual plans (**Figure 23**), the new middle school would remove some of the parking spaces in Parking Area A and would shorten the parking and access loop for internal circulation. This would reduce the ability for parents would not be able to drop –off and pick up their children inside the school grounds and would need to park their vehicles on available spaces on Lomita Drive and other nearby streets. New parking would be constructed east of the new campus, so the overall number of spaces would remain approximately the same, however the number of students and staff would substantially increase.
>
> A January 17, 2012 settlement agreement associated with the construction of the current Edna Maguire Elementary School may also need to be considered. Specifically, Item H of

[1] PHA Transportation Consultants, *Mill Valley Middle School Reconstruction Traffic Study, Addendum B, Scenarios 5 and 6*, February 2025
[2] Id.
[3] Marin County Department of Public Works, Engineering Division, Initial Study, Lomita Drive Road Rehabilitation Project, June 12, 2025

that agreement contemplates a one-way traffic access plan for the school, and Item J of that agreement contemplates 126 dedicated full-time parking spaces, 18 curbside special-event spaces, and up to 71 District-only special-event spaces as part of the Edna Maguire Elementary School project. Note that level-of-service and parking impacts are not considered potentially significant impacts under CEQA, and are discussed for informational purposes only."

Emergency Access

The District has developed emergency response plans for each of its schools, including the Edna Maguire School. These are shown on the District's website: https://www.mvschools.org/140410_2, and include the following measures discussing the District's communication efforts and emergency preparedness plan:

Communications

1. **Website Pop-Up Alert:** We have a constant pop-up alert on all pages of our website. This will state if schools are open or closed.
2. **ParentSquare Alert:** We send a ParentSquare alert which generates an instant message to your chosen method of contact.
3. **ParentSquare email:** We send a ParentSquare email post to all district families.
4. **Updates:** We will provide updates on the website (pop-up) and with ParentSquare as new information is received.
5. **Social Media:** We update social media if time allows – **Instagram**, **Facebook**
6. **Debrief:** Following the event, we post a debrief document on our website headlines section and report out with ParentSquare and in the Family Newsletter.

Emergency Preparedness

When you receive an Alert from ParentSquare, please regard it as very important. Do not call the school or the District Office. If it is an emergency notification, it will include instructions.

Do Not Drive on Campus – School campuses must be clear of cars to allow for emergency vehicles. Park your car safely nearby and walk to school. Do not leave your car in the street where it will block other cars or emergency vehicles.

Major Earthquake – If buildings are unsafe to re-enter, CHILDREN WILL REMAIN UNDER THE SUPERVISION OF SCHOOL AUTHORITIES until parents or designated

responsible adults can pick them up. Students will only be released to a parents or guardian as listed on their emergency card.

Student Pick-up Locations – Pick-up is at the following Outdoor Student Release areas:

- **Edna Maguire:** Behind school at blacktop play areas

For the Alternatives involving the Edna Maguire/Terra Marin School site, the staging area for elementary school students would remain unchanged. Middle school students would stage separately at the basketball courts behind Edna Maguire School Building G[4].

Conclusions

Construction of the interim or permanent middle school would increase traffic and parking congestion in the Lomitas neighborhood. The District would incorporate staggered start hours for the schools and implement a drop-off and pick-up management plan as part of any of the Edna Maguire/Terra Marin alternatives, which would reduce any potential social impacts based on traffic and parking lot congestion. School hours for the two schools would be staggered by 30-45 minutes in order to reduce traffic congestion, and a shuttle bus would be provided from the other District elementary schools to the site so that pickup locations are spread at various locations to lessen congestion at any given shuttle pickup location.

The District has emergency access policies in place to avoid having parents driving to campus in an emergency until notified to do so by the District and warn parents not to block streets in case of emergencies. In addition, the Mill Valley Police and Fire Departments would implement street closures as necessary to allow continued emergency vehicle access. This means that even if the student population at the Edna Maguire/Terra Marin increases, the number of private vehicles on the road would not increase during an emergency. Finally, schools are designed and constructed to stringent earthquake and fire standards and are intended to serve as safe spaces in earthquakes and other emergencies. Therefore, the alternatives on the Edna Maguire/Terra Marin site would not have a significant impact on the environment based on an increase in traffic congestion or potential emergency response impacts in the project area.

Master Response 4: Adequacy of School Site at Edna Maguire/Terra Marin Campus.

Several comments noted that the potential alternative site area of about 4 acres is below the State department of Education Standards for middle schools. As a threshold matter, these comments do not claim that any purported noncompliance would result in a significant impact on the environment. Relatedly, these comments neither provide substantial evidence of any

[4] Email from Julio Arroyo, MVSD Facilities Manager, to Richard Grassetti, Grassetti Environmental Consulting, September 17, 2025.

environmental impact, nor do such comments provide any evidence that the Draft EIR's conclusions with respect to the topics raised are unsupported by substantial evidence.

Title 5 of the California Code of Regulations sets out requirements relating to the construction of school facilities. The standards set forth in Title 5 establish general recommendations regarding the amount of site acreage required for new school sites, but also provide that if a school site is less than the recommended acreage, the district may nonetheless proceed with that school site provided the district "demonstrate[s] how the students will be provided an adequate educational program including physical education as described in the district's adopted course of study."

Accordingly, the relevant standards are not mandatory so long as the District establishes the adequacy of the program during the California Department of Education approval process necessary to access state funding.

The relevant standard set forth in Title 5, Division 1, Chapter 13, Subchapter 1, Article 2, Section 14010 is excerpted below:

> *Section 14010. Standards for School Site Selection.*
>
> "All districts shall select a school site that provides safety and that supports learning. The following standards shall apply:
>
> "(a) The net usable acreage and enrollment for a new school site shall be consistent with the numbers of acres and enrollment established in the 2000 Edition, "School Site Analysis and Development"[5] published by the California Department of Education and incorporated into this section by reference, in toto, **unless sufficient land is not available or circumstances exist due to any of the following**:
>
> (1) Urban or suburban development results in insufficient available land even after considering the option of eminent domain.
>
> (2) Sufficient acreage is available but it would not be economically feasible to mitigate geological or environmental hazards or other site complications which pose a threat to the health and/or safety of students and staff.
>
> (3) Sufficient acreage is available but not within the attendance area of the unhoused students or there is an extreme density of population within a given attendance area requiring a school to serve more students on a single site. Choosing an alternate site would result in extensive long-term bussing of students that would cause extreme financial hardship to the district to transport students to the proposed school site.

[5] Available at https://www.cde.ca.gov/ls/fa/guideschoolsite.asp.

(4) Geographic barriers, traffic congestion, or other constraints would cause extreme financial hardship for the district to transport students to the proposed school site.

(b) **If a school site is less than the recommended acreage required in subsection (a) of this section, the district shall demonstrate how the students will be provided an adequate educational program including physical education as described in the district's adopted course of study**." *(Emphasis added*)

Master Response 5: Project Description and Alternatives

Several comments were received asking whether the Project Description would need to be revised based on questions as to whether the Project was financially infeasible and the likelihood of adopting an alternative due to fiscal constraints. These comments have relatedly questioned whether there is a need to recirculate the Project's EIR based on whether updates were required for the Project Description.

CEQA Guidelines Section 15124 establish the basic requirements for a Project Description, requiring that the Project Description contain "[t]he precise location and boundaries of the proposed project"; "[a] statement of the objectives sought by the proposed project"; "[a] general description of the project's technical, economic, and environmental characteristics, considering the principal engineering proposals if any and supporting public service facilities"; and "[a] statement briefly describing the intended uses of the EIR." The Project Description need not however "supply extensive detail beyond that needed for evaluation and review of the environmental impact." (CEQA Guidelines Section 15124.)

There is no requirement in CEQA to discuss or weigh the feasibility of a project in the Project Description, nor is there any requirement to update a Project Description based a project's financial infeasibility. In addition to there being no express requirement to do so, CEQA also mandates that it be interpreted in a manner which does not impose procedural or substantive requirements beyond those explicitly stated in CEQA or in the CEQA Guidelines. (Public Resources Code Section 21083.1.)

To the contrary, the case law regarding Project Descriptions acknowledges that flexibility in a project may be required due to variable future conditions. (*See, e.g., The Claremont Canyon Conservancy v. Regents of University of California* (2023) 92 Cal.App.5th 474, 490 [finding that changes in the conditions under which the project would be undertaken did not result in the EIR providing insufficient information to analyze environmental impacts].)The Project Description is not intended to be so rigid as to prohibit flexibility when project operations may be subject to changing conditions in the future, and a change in the project does not necessarily render the Project Description inadequate unless the change would thwart the public's ability to participate in the process and comment meaningfully on the EIR. (*Compare The Claremont Canyon*

Conservancy v. Regents of University of California (2023) 92 Cal.App.5th 474, 490 *with Save Our Capitol! V. Department of Gen. Servs.* (2023) 87 Cal.App.5th 655.)

The lead agency is not required to approve the proposed project described in the EIR and instead decision-makers "have the flexibility to implement that portion of a project that satisfies their environmental concerns." (*Sierra Club v. City of Orange* (2008) 163 Cal.App.4th 523, 533; *see also Dusek v. Redevelopment Agency* (1985) 173 Cal.App.3d 1029, 1041 [finding that lead agency did not abuse its discretion by adopting a narrower project than that initially envisioned].) A lead agency may approve an environmentally superior alternative to the project or an alternative that is superior to the project in other respects. (*Ocean Street Extension Neighborhood Association v. City of Santa Cruz* (2021) 73 Cal.App.5th 985, 1016.) A lead agency also has the discretion to approve a revised version of the project that was not considered in the EIR if it is similar in scope and uses as the alternatives evaluated in the EIR and the revised version of the project would not have environmental impacts that were not analyzed in the EIR. (*Southwest Regional Council of Carpenters v. City of Los Angeles* (2022) 76 Cal.App.5th 1154, 1181-82 [authorizing approval of revised version of project within the original project footprint].) Approving such a revised version of the project is not violative of CEQA's information requirements and does not impede informed decisionmaking. (*Id.* at 1182.) Relatedly, a Project Description is not inadequate because part of a project may not be completed, and a project proponent must instead assume that all portions of a project will be completed. (*Environmental Council of Sacramento v. County of Sacramento* (2020) 45 Cal.App.5th 1020, 1030.)

Near the completion of the Draft EIR, the District received information related to the economic feasibility of the Project that would be a constraint on the implementation of the proposed project. CEQA does not require that the District restart the CEQA process with a new project description based on this economic information. To the contrary, based on the legal framework summarized above, the Project Description is adequate and does not need to be revised to address the likelihood of adopting a Project alternative based on fiscal constraints. The Project Description correctly and conservatively assumed that all aspects of the Project could be completed such that the EIR analyzes the maximum potential environmental impacts of the Project.

Further, the Draft EIR need not be recirculated to accommodate the commenters' concerns. CEQA Guidelines Section 15088.5 only requires recirculation of an EIR when "significant new information is added to the EIR after public notice of the availability of the draft EIR for public review under [CEQA Guidelines Section 15087] but before certification." The term "information" may include changes in the project and environmental setting as well as additional data or other information, and the term "significant" requires that the EIR be changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse effect or a feasible

way to mitigate or avoid an impact that would not be implemented in the project. (CEQA Guidelines Section 15088.5, subd. (a); *see also Laurel Heights Improvement Association of San Francisco, Inc. v. The Regents of the University of California* (1993) 6 Cal. 4th 1112, 1130 [discussing examples of situations in which recirculation is required].) CEQA also does not require that the public be afforded an opportunity to comment on the final approved project such that recirculation of an EIR that has been updated to contain a description of the final approved project is required. (*Southwest Regional Council of Carpenters v. City of Los Angeles* (2022) 76 Cal.App.5th 1154, 1181-82.)

Here, the financial constraints of the Project do not constitute "significant new information" requiring recirculation of the EIR.

Citing to *Washoe Meadows Community v. Department of Parks and Recreation* (2017) 17 Cal.App.5th 277, one of the commenters claims that the EIR is inadequate because the EIR does not clearly identify and analyze a single proposed project because the District "has already rejected the proposed project in the Draft EIR." The case cited by this commenter is inapplicable to the Project and involves a distinct set of circumstances that are not at issue here.

In *Washoe Meadows Community*, the California Court of Appeals found an EIR inadequate because the EIR's project description "did not describe a project at all" and instead only "presented five different alternatives…" (*Washoe Meadows Community, supra*, 17 Cal.App.5th at 288.) In *Washoe Meadows Community*, the Draft EIR failed to identify any project whatsoever and instead only analyzed five alternatives in considerable detail. A similar situation is not at issue here. The Draft EIR describes in detail and analyzes a proposed Project and also analyzes a reasonable range alternatives to the Project. The project description here is more akin to that upheld in *Citizens for a Sustainable Treasure Island v. City and County of San Francisco* (2014) 227 Cal.App.4th 1036), in which the Draft EIR clearly identified a project even if some of the details relating to that project had not been decided upon when the EIR was approved. (*Treasure Island, supra,* 227 Cal.App.4th at 1052-55.)

In sum, when considering project approval, the lead agency is not required to approve the proposed project described in an EIR, and instead the lead agency has the discretion to implement portions of a project to address both environmental and policy concerns. (*Sierra Club v. City of Orange* (2008) 163 Cal.App.4th 523, 533.) A lead agency has the discretion to approve an alternative or revised version of the project if it is similar in scope, size, and use of the project analyzed and does not exceed the maximum possible scope of the project analyzed. (*South of Market Community Action Network v. City and County of San Francisco* (2019) 33 Cal.App.5th 321, 334-36.) In so doing, the project description may enhance, rather than obscure, the information available to the public. (*Id.* at 334; *see also Southwest Regional Council of Carpenters v. City of Los Angeles* (2022) 76 Cal.App.5th 1154, 1176.)

Master Response 6: Adequacy of Description of Alternative 5 (Renovation of the Existing MVMS Main Building and Gym)

Several comments were received asking for further description of Alternative 5 (Renovation of the Existing MVMS Main Building and Gym) and questioning the adequacy of the Draft EIR's description and analysis of this alternative.

Under CEQA, an EIR must evaluate the comparative merits of the alternatives identified in an EIR. (CEQA Guidelines Section 15126.6.) The level of analysis of alternatives is subject to a rule of reason, as with the range of alternatives that must be discussed. (*Laurel Heights Improvement Assn. v. Regents of University of California* (1988) 47 Cal.3d 376, 406.) CEQA does not require that the discussion of alternatives be exhaustive. (*Sierra Club v. City of Orange* (2008) 163 Cal.App.4th 523, 548.)

The analysis must contain concrete information about each alternative sufficient to allow a fact-based comparison of the alternatives with the project, and the significant adverse environmental effects of such alternative must be discussed, but in less detail than is required for the project's effects. (CEQA Guidelines Section 15126.6(d).) The analysis is sufficient if it assesses the relative merits of the project and the alternatives. (*Save San Francisco Bay Association v. San Francisco Bay Conservation and Development Commission* (1992) 10 Cal.App.4th 908.) Text discussing the alternatives selected for evaluation along with a comparative matrix may be sufficient, and an EIR's evaluation of an alternative does not require the preparation of design plans or architectural drawings of alternatives, and it is appropriate to rely on estimates for purposes of the stated square footage. (*Sierra Club, supra*, 163 Cal.App.4th at 547; *Los Angeles Conservancy* v. *City of West Hollywood* (2017) 18 Cal.App.5th 1031, 1038-39.)

While consideration of feasibility and ability to achieve project objectives may be a key component of the analysis, a discussion of the feasibility of alternatives to the project need not be included in the EIR. (*Sierra Club v. County of Napa* (2004) 121 Cal.App.4th 1490, 1504-05 [EIR not required to contain analysis of economic feasibility of alternatives].)

While the Draft EIR's description of the alternatives met these requirements for alternatives, to accommodate comments requesting additional information and analysis, the Final EIR includes a revised description of Alternative 5 (Renovation of the Existing MVMS Main Building and Gym). Among other revisions, the revised description includes additional discussion of the sub-slab de-pressurization systems to address potential VOC concerns; includes a greater description of the grading activities and amounts of cut and fill required for the alternative; discusses the anticipated timing and construction schedule; and includes an expanded analysis of several of the analyzed environmental topics. The expanded discussion of environmental

topics includes updates to the Air Quality discussion (updated in part to reflect a new detailed air quality assessment included in the Final EIR); the Cultural Resources and Tribal Cultural Resources discussion; and the Noise discussion (updated in part to reflect a new detailed noise assessment included in the Final EIR).

In sum, these updates amplify information about this alternative to support the evaluation of the relative merits of this alternative and the Project, and to allow a fact-based comparison of this alternative with the Project. With the inclusion of this updated analysis, the discussion of Alternative 5 facilitates an assessment of the relative merits of the Project and this alternative, and continues to be sufficient for purposes of CEQA.

The updated analysis further does not require recirculation of the Draft EIR. The standards for recirculation set forth in CEQA Guidelines Section 15088.5 require recirculation "when significant new information is added to the EIR after public notice is given of the availability of the draft EIR for public review." "Significant new information" requiring recirculation includes (1) where a new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented; (2) where a substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance; (3) where a feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the significant environmental impacts of the project, but the project's proponents decline to adopt it; and (4) where the draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded. (CEQA Guidelines Section 15088.5(a).) None of these conditions are met here.

CEQA Guidelines Section 15088.5 further makes clear that "[r]ecirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR." Here, the updated analysis, which does not change the conclusions set forth in the Draft EIR and serves to merely clarify or amplify the initial analysis does not require recirculation, and the lead agency's decision to not recirculate is supported by substantial evidence in the administrative record. (CEQA Guidelines Section 15088.5(d).)

Master Response 7: Preparation of a Preliminary Endangerment Assessment

Several comments questioned whether the EIR was insufficient on the basis that a Preliminary Endangerment Assessment ("PEA") has not yet been completed. The forthcoming finalization of a PEA is discussed in detail in the Draft EIR at Section 3.7 (Hazards, Hazardous Materials and Wildfire) and associated data is further incorporated into Mitigation Measure 3.7-2.

As discussed in the Draft EIR at Section 3, in order to qualify for certain funding sources and because the Project site was previously a landfill and the proposed redevelopment would involve construction to continue the existing school atop a landfill, the California Education Code requires that the Department of Toxic Substances Control (DTSC) review potential environmental concerns relating to the Project. The DTSC's evaluation is to proceed in a three-step process including the review of a Phase I Environmental Site Assessment; the preparation of a PEA; and if necessary, the preparation of a response action.

In April 2024, the Mill Valley School District entered into an Environmental Oversight Agreement with the DTSC regarding the DTSC's oversight of the PEA process. Environmental consultants Ninyo & Moore prepared a draft PEA dated April 8, 2025. Following its review, DTSC provided comments on the draft PEA, and Ninyo & Moore prepared a memo dated August 20, 2025 summarizing its responses to DTSC's comments and its proposed revisions to the draft PEA. A subsequent draft of the PEA has been submitted to DTSC. Once the PEA is finalized, Ninyo & Moore will prepare a Mitigation Plan in consultation with DTSC and/or the Marin County Environmental Health Services Division, and will also prepare a Post Closure Land Use Plan in conjunction with the Marin County Environmental Health Services Division. The Mitigation Plan and the Post Closure Land Use Plan will address necessary measures to facilitate the redevelopment of the site and to ensure continued safe occupancy.

Several commenters assert that the PEA must be approved prior to the EIR for the Project so that the analysis set forth in the PEA can be incorporated into the EIR's analysis. The preparation of a PEA is expressly contemplated as a separate process from the preparation of EIR that may (though is not required) undergo a public review process concurrently with the public review of a Draft EIR.

The revised PEA report submitted to DTSC on October 17, 2025 is included in the Final EIR with conforming text changes in the Final EIR chapters and is part of the substantial evidence that supports the EIR's conclusions related to hazards. The revised report, which responds to feedback previously provided by DTSC, does not contain any substantial evidence indicating that the Project would have a new or substantially increased significant impact on the environment with respect to the topics addressed by the PEA and that could not be mitigated to a level of insignificance. This means that the updated PEA report does not constitute significant new information requiring recirculation of the Draft EIR. (See Master Response 5, above, for discussion of recirculation requirements.)

Mitigation Measure 3.7-2 expressly requires incorporation of environmental sampling data into an updated HHRA upon which the Mitigation Plan and/or the Post Closure Land Use Plan will be developed. Mitigation Measure 3.7-2 has been revised to reflect that either, or both, DTSC and the LEA may have oversight over environmental conditions and protective measures associated

with construction activities and requires compliance with the Mitigation Plan and/or the Post-Closure Land Use Plan such that any significant impacts (if any) would be mitigated to a level of insignificance and further imposes specific requirements to be incorporated into such plans. Such mitigation is permissible under CEQA as it identifies specific criteria the agency will apply in determining that the impact will be mitigated based on subsequent studies. (*See*, *e.g.*, *Ocean St. Extension Neighborhood Association v. City of Santa Cruz* (2021) 73 Cal.App.5th 985, 1010 [deferral appropriate where specific mitigation method or extent of mitigation depends on the results of a later study].)

C. WRITTEN COMMENTS AND RESPONSES

Public Agency Comments

1. California Department of Fish and Wildlife Comments

(Comment letter begins on the following page)

Docusign Envelope ID: 1B235CC4-368C-44BA-862B-1FC2C9BF962C

State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
Bay Delta Region
2825 Cordelia Road, Suite 100
Fairfield, CA 94534
(707) 428-2002
www.wildlife.ca.gov

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director

October 6, 2025

Julio Arroyo, Director of Facilities
Mill Valley School District
411 Sycamore Avenue
Mill Valley, CA 94941
JArroyo@MVSchools.org

Subject: Mill Valley Middle School Reconstruction Project, Draft Environmental Impact Report, SCH No. 2024060669, Marin County

Dear Julie Arroyo:

The California Department of Fish and Wildlife (CDFW) received a Notice of Availability of a Draft Environmental Impact Report (EIR) from the Mill Valley School District (District) for the Mill Valley Middle School Reconstruction Project (Project) pursuant the California Environmental Quality Act (CEQA) and CEQA Guidelines.[1]

CDFW is submitting comments on the EIR to inform the District, as the Lead Agency, of potentially significant impacts to biological resources associated with the Project.

CDFW ROLE

CDFW is a **Trustee Agency** with responsibility under the California Environmental Quality Act (CEQA) for commenting on projects that could impact fish, plant, and wildlife resources (Pub. Resources Code, § 21000 et seq.; Cal. Code Regs., tit. 14, § 15386). CDFW is also considered a **Responsible Agency** if a project would require discretionary approval, such as a permit pursuant to the California Endangered Species Act (CESA) or Native Plant Protection Act (NPPA), the Lake and Streambed Alteration (LSA) Program, and other provisions of the Fish and Game Code that afford protection to the State's fish and wildlife trust resources. Pursuant to our authority, CDFW has the following concerns, comments, and recommendations regarding the Project.

PROJECT DESCRIPTION SUMMARY

Proponent: Mill Valley School District

Objective: The Project will replace the existing Mill Valley Middle School main building and eight existing portables with three new school buildings on the existing Middle School campus. The Project consists of four phases: 1) construction of an interim

[1] CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

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campus for students to attend during the construction period, 2) demolition of the existing school buildings, 3) construction (and then operation) of the new school buildings and grounds, and 4), removal of the interim campus and restoration of recreation areas and parking on that part of the site.

Location: The Project is located at 411 Sycamore Avenue, Mill Valley, CA 94941, in the County of Marin, with an approximate centroid of Latitude 37.897282° and Longitude -122.528890°.

REGULATORY REQUIREMENTS

California Fully Protected Species

Fully protected species may not be taken or possessed at any time and no licenses or permits may be issued for their take except as follows:

- Take is for necessary scientific research;
- Efforts to recover a fully protected, endangered, or threatened species, live capture and relocation of a bird species for the protection of livestock; or
- They are a covered species whose conservation and management is provided for in a Natural Community Conservation Plan (Fish and Game Code, §§ 3511, 4700, 5050, & 5515).

Specified types of infrastructure projects may be eligible for an incidental take permit for unavoidable impacts to fully protected species if certain conditions are met (Fish and Game Code § 2081.15). Project proponents should consult with CDFW early in the project planning process. **The Project has the potential to impact California black rail (*Laterallus jamaicensis coturniculus*) and California Ridgway's rail (*Rallus obsoletus obsoletus*), which are both California fully protected species and CESA listed as endangered and threatened species, respectively, as further described below.**

Raptors and Other Nesting Birds

CDFW has jurisdiction over actions that may result in the disturbance or destruction of active nest sites or the unauthorized take of birds. Fish and Game Code sections protecting birds, their eggs, and nests include sections 3503 (regarding unlawful take, possession or needless destruction of the nests or eggs of any bird), 3503.5 (regarding the take, possession or destruction of any birds-of-prey or their nests or eggs), and 3513 (regarding unlawful take of any migratory nongame bird). Migratory birds are also protected under the federal Migratory Bird Treaty Act (MBTA).

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COMMENTS AND RECOMMENDATIONS

CDFW offers the comments and recommendations below and in **Attachment 1** to assist the District in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources.

I. Mitigation Measure and Related Impact Shortcomings

MANDATORY FINDINGS OF SIGNIFICANCE. Does the Project have potential to substantially reduce the number or restrict the range of an endangered, rare, or threatened species?

AND

Would the Project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by CDFW or U.S. Fish and Wildlife Service?

COMMENT 1: California Black Rail and California Ridgway's Rail

Issue: There are California Natural Diversity Database (CNDDB) records of both California black rail (CBR) and California Ridgway's rail (CRR) within 0.4 miles of the Project site, and there appears to be suitable habitat adjacent to the Project area. EIR pages 3.3-12 and 3.3-13 state that both rail species are not expected to occur but were included in the mitigation section due to the proximity of recorded occurrences and presence of marsh habitat adjacent to the Project and that there is potential for "project-related noise and disturbance to impact this species." The Project has the potential to impact CBR and CRR through auditory or visual disturbances above ambient levels. Disturbances from Project activities within 700 feet of suitable nesting habitat may result in CBR and CRR nest abandonment and loss of eggs or reduced health and vigor and loss of young. Although the presence of urban development and disturbed vegetation areas exist around potentially suitable nesting habitat, audio and visual disturbances may still occur. Mitigation Measure 3.3.1c (EIR page 3.3-17) does not address visual disturbances by the Project, buffer zones for avoidance, or protocol surveys for rail detection. The Measure states that a biologist will be present for the duration of Project activities that are within 300 feet of potential rail habitat and within 600 feet of breeding rail detection locations but does not state that these distances will be avoided, only that a biologist will be present. Therefore, if an active CBR or CRR nest is disturbed by the Project, the Project may result in a substantial reduction in the number of a fully protected species, which is considered a Mandatory Finding of Significance pursuant to CEQA Guidelines section 15065, subdivision (a)(1).

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Recommended Mitigation Measures: To reduce potential impacts to CRR and CBR less-than-significant and comply with Fish and Game Code section 3511 (fully protected avian species) and CESA, CDFW recommends replacing the existing mitigation measure 3.3.1c with the following mitigation measure in the EIR:

Mitigation Measure 3.3.1c (California Ridgeway's Rail and California Black Rail Surveys and Avoidance): Any Project activities within 700 feet of potentially suitable CBR and CRR nesting habitat shall be avoided during the breeding season (February 1 to August 31) each year unless appropriately timed, yearly protocol level surveys are conducted and survey methodology and results are submitted to and accepted in writing by CDFW, or the Project implements noise and visual avoidance measures below. Surveys shall focus on suitable habitat that may be disturbed by Project activities during the breeding season to ensure that CBR are not nesting in these locations.

If breeding CBR and CRR are determined to be present, no activities, visual disturbance (direct line of sight) and/or an increase in the ambient noise level shall occur within 700 feet of areas where CBR and CRR have been detected during the breeding season.

If work must be done during the breeding season within 700 feet of CBR and CRR nesting habitat, and annual surveys have not documented CBR and CRR absence, noise levels shall not exceed 10 decibels (dBA) over existing ambient noise levels and a noise attenuating fence and/or visual barrier shall be installed to reduce visual and/or acoustic impacts, unless otherwise approved in writing by CDFW. In this case, the Project shall prepare a noise and visual avoidance plan and obtain CDFW's written approval of the plan, and implement the CDFW-approved plan, prior to conducting Project activities.

ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations. (Pub. Resources Code, § 21003, subd. (e).) Accordingly, please report any special-status species and natural communities detected during Project surveys to CNDDB. The CNDDB field survey form can be filled out and submitted online at the following link: https://wildlife.ca.gov/Data/CNDDB/Submitting-Data. The types of information reported to CNDDB can be found at the following link: https://www.wildlife.ca.gov/Data/CNDDB/Plants-and-Animals.

Docusign Envelope ID: 1B235CC4-368C-44BA-862B-1FC2C9BF962C

ENVIRONMENTAL DOCUMENT FILING FEES

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of environmental document filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the environmental document filing fee is required in order for the underlying Project approval to be operative, vested, and final. (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089.)

CONCLUSION

CDFW appreciates the opportunity to comment on the EIR to assist the District in identifying and mitigating Project impacts on biological resources.

Questions regarding this letter or further coordination should be directed to Jordan Beaton, Environmental Scientist, at Jordan.Beaton@wildlife.ca.gov or (707) 980-5172; or Melanie Day, Senior Environmental Scientist (Supervisory), at Melanie.Day@wildlife.ca.gov or (707) 210-4415.

Sincerely,

DocuSigned by:
Erin Chappell
B77E9A6211EF486...

Erin Chappell
Regional Manager
Bay Delta Region

Attachment 1: Draft Mitigation Monitoring and Reporting Program

ec: Office of Land Use and Climate Innovation (SCH No. 2024060669)
Craig Weightman, CDFW Bay Delta Region – Craig.Weightman@wildlife.ca.gov

Docusign Envelope ID: 1B235CC4-368C-44BA-862B-1FC2C9BF962C

ATTACHMENT 1

Draft Mitigation and Monitoring Reporting Plan

Biological Resources (BIO)			
Mitigation Measure (MM)	**Description**	**Timing**	**Responsible Party**
BIO-3.3.1c	*California Ridgeway's Rail and California Black Rail Surveys and Avoidance:* Any Project activities within 700 feet of potentially suitable CBR and CRR nesting habitat shall be avoided during the breeding season (February 1 to August 31) each year unless appropriately timed, yearly protocol level surveys are conducted and survey methodology and results are submitted to and accepted in writing by CDFW, or the Project implements noise and visual avoidance measures below. Surveys shall focus on suitable habitat that may be disturbed by Project activities during the breeding season to ensure that CBR are not nesting in these locations. If breeding CBR and CRR are determined to be present, no activities, visual disturbance (direct line of sight) and/or an increase in the ambient noise level shall occur within 700 feet of areas where CBR and CRR have been detected during the breeding season. If work must be done during the breeding season within 700 feet of CBR and CRR nesting habitat, and annual surveys have not documented CBR and CRR absence, noise levels shall not exceed 10 dBA over existing ambient noise levels and a noise attenuating fence and/or visual barrier shall be installed to reduce visual and/or acoustic impacts, unless otherwise approved in writing by CDFW. In this case, the Project shall prepare a noise and visual avoidance plan and obtain CDFW's written approval of the plan, and implement the CDFW-approved plan, prior to conducting Project activities.	Prior to Ground Disturbance and for Duration of Construction	Project Applicant

Responses to CDFW Comments

Response to Comment 1. Per California Department of Fish and Wildlife's request, Mitigation Measure 3.3.1C on p. 3.3-18 of the DEIR is replaced with the following measure. No new or significantly more severe impact requiring new mitigation has been identified in the comment.

> *Mitigation Measure 3.3.1c (California Ridgeway's Rail and California Black Rail Surveys and Avoidance):*
>
> A qualified biologist shall survey for, and map, potential California Ridgeway's Rail (CRR) and California Black Rail (CBR) habitat within 700 feet of any proposed construction at the Sycamore Avenue site. If no such habitat is encountered, no additional mitigation is required.
>
> If potential nesting habitat is identified within 700 feet of proposed construction areas, protocol-level surveys using the 2017 USFWS Site-Specific Survey Protocol shall be conducted, and survey results shall be submitted to CDFW. If no nesting CRR or CBR are encountered, no additional measures are required.
>
> If breeding CRR or CBR are identified in the annual breeding season surveys, work done during the breeding season within 700 feet of CBR and CRR occupied nesting habitat shall not cause noise levels exceeding 10 decibels (dBA) over existing ambient noise levels. If noise levels are determined to exceed 10 dBA, the applicant shall prepare a noise and visual avoidance plan (including barriers) and obtain CDFW's written approval of the plan and implement the CDFW-approved plan, prior to conducting noise-generating Project activities.

2. Sewerage Agency of Southern Marin Comments

From: **Mark Neumann** <mneumann@cityofmillvalley.gov>
Date: Mon, Oct 20, 2025 at 3:23 PM
Subject: RE: SASM Comments on MVMS Draft EIR
To: jarroyo@mvschools.org <jarroyo@mvschools.org>
Cc: Todd Cusimano <tcusimano@cityofmillvalley.gov>, ekaufman@mvschools.org <ekaufman@mvschools.org>, Andrew Poster <APoster@cityofmillvalley.gov>, Steven Ross <sross@cityofmillvalley.gov>

Hi Julio,

I'd like to amend the comments relayed by Steven, below to these:

- Section 2.3; Neither SASM, nor the DPW Corporate Yard are mentioned as adjacent land uses.
- Section 2.5.4 (page 2-15); MVMS is served by City of Mill Valley Sewer.
    - There is another connection to the West going into Camino Alto (see Roys sewer inspection report from 8/13/24 showing this connection).
    - The connection to the existing sewer system on Sycamore is to a high flow main; which should be replaced with a connection to a 15" main that is currently not utilized for best compliance to SASM Standards and Specifications and to minimize the chance of detrimental impacts to both the main and lateral systems.
    - Please continue to work with the City's Public Works Department to resolve the existing NTR on the Sycamore connection.
- Section 3.2-8 (page 3.2-38); the trickling filters are likely an inappropriate "center" of SASM for purposes of estimating SASM's odor control. The center north point of the primary clarifiers would be more appropriate place to evaluate odors.

Thank you,
Mark Neumann
General Manager
Sewerage Agency of Southern Marin

Responses to Sewage Agency of Southern Marin (SASM) Comments

Section 2.3: The adjacency of the sewage treatment plant and associated corporation yard are noted. The treatment plant facilities are discussed in detail in the Odors discussion in the Air Quality chapter.

Section 2.5.4. The additional sewage pipeline and need for a replacement connection described in the comment are noted. The District will work with SASM to assure that all necessary pipeline connections and replacements associated with Project construction are addressed prior to operation of any new facilities.

Section 3.2-8. The Draft EIR states that 1) the main building at the existing school is approximately 500 feet from the center of the SASM Wastewater Treatment Plant (WWTP) (defined as the trickling filters), 2) the new portable buildings at the interim campus would be approximately 360 feet from the center of the SASM WWTP, and 3) the nearest building of the proposed permanent campus (east classrooms) would be approximately 400 feet from the center of the SASM WWTP.

The comment suggests using the primary clarifiers as the center of the SASM WWTP. The primary clarifiers are located approximately 75 feet to the west of the trickling filters. Although this center point would result in different distances (i.e., lower) to the respective school locations, it would not substantially change the relative general dilution estimates presented in the document and would not change the conclusions associated with odor impacts.

With respect to the outdoor environment, the EIR discloses that both the interim and permanent campus would be subject to potentially significant and unavoidable impacts, and the proposed change in different distances would not alter this conclusion or result is a substantially increased impact.

With respect to indoor environments, the conclusion that the Project would result in less-than-significant impacts with mitigation is due in part to Mitigation Measure 3.2-8, which requires the incorporation of various measures into both the interim and permanent campuses, including the installation of HEPA air purifiers in classrooms and a MERV-13 filtration system, thereby reducing odor impacts to a level of insignificance with respect to indoor environments that might be located closer to the primary clarifiers. MERV-13 filters with activated carbon reduce odors such as those associated with H2S by 50 to 70 percent. In addition, Mitigation Measures 3.2-9 and 3.2-10 would further ensure impacts on indoor environments were reduced to a level of insignificance and any potential incremental increase in the impact would not alter this conclusion.

The Draft EIR states that using general dilution estimates (as a function of distance from source), the outdoor concentrations of pollutants which cause odors such as hydrogen sulfide would be expected to be approximately 70 percent higher at the interim campus than at the existing school. The increase in frequency and magnitude of concentrations of odor-causing pollutants would be expected because the interim campus is closer to the odor source (regardless of whether the center of the WWTP is determined to be the trickling filters or the primary clarifiers) and pollutant concentrations tend to be higher as the location is closer to the source.

The Draft EIR does however make clear that the Project itself “would not involve operational activities that generate substantial odors.” To the extent that the Project itself would not

generate substantial odors, the concerns raised in this comment generally implicate an impact of the environment on the Project, and CEQA generally does not require an analysis of the impact of existing environmental conditions on a proposed project. (*California Building Industry Association v. Bay Area Air Quality Management District* (2015) 62 Cal.4th 369, 377 [holding that agencies subject to CEQA are generally not required to analyze the impact of existing environmental conditions on a project's future users or residents]; *see also South Orange County Wastewater Authority v. City of Dana Point* (2011) 196 Cal.App.4th 1604, 1616 [holding that odor from existing vicinity conditions that might affect project residents need not be considered because those are not impacts on the environment].)

In any event, the EIR analyzes and conservatively discloses the impact for purposes of informing the public agency decision-makers and the public of the potential impact of odor on the Project.

The frequency and magnitude of odor would likely be greater at the interim campus and permanent campus compared to the existing school. Regardless of the center of the SASM WWTP, the project would have **significant and unavoidable** odor impacts because the magnitude and frequency of odor impacts at the (outdoor environment) interim and permanent campus would potentially be greater than at the existing school. However, within the indoor environment for the interim and permanent campus, the odor impacts indoors would be less than significant with the implementation of Mitigation Measures 3.2-8 through 3.2-10.

3. City of Mill Valley Comments

(Comment letter begins on the following page)

Docusign Envelope ID: 94A3C401-4E1F-49B9-B795-0B4E541F95CE

October 17, 2025

Mr. Julio Arroyo
Director of Maintenance and Operations
Mill Valley School District
411 Sycamore Avenue
Mill Valley, CA 94941

via email: jarroyo@mvschools.org

SUBJECT: Mill Valley Middle School Reconstruction Project – Draft EIR

Mr. Arroyo,

The City of Mill Valley (City) has reviewed the Mill Valley School District's (District) Draft Environmental Impact Report (DEIR) for the Mill Valley Middle School MVMS Reconstruction Project (Project). The City appreciates and supports the District's investments in its educational facilities that benefit Mill Valley residents, and we appreciate the District's outreach to the City regarding the project. Due to the project's location and potential for environmental impacts within the City and potential for impacts to City facilities such as the adjacent Community Center, Sewerage Agency of Southern Marin (SASM) Treatment Plant and City Corporate Yard, roadways and parks, the City is transmitting this letter to the District with comments on the Draft EIR prepared pursuant to the California Environmental Quality Act (CEQA).

DEIR PREFERRED PROJECT AND LIKELY ALTERNATIVES

The Preferred Project evaluated in the detail in the DEIR is described in Chapter 2, Project Description. Alternatives to the preferred project are described in Chapter 5. Since commencing the CEQA environmental review, the District and its consultants have identified substantial concerns with the project site that have significantly increased the cost estimate of the Preferred Project. The District has stated that it is considering approving other alternatives examined in the EIR that would reduce the project costs but would still meet most of the project objectives. The Preferred Project and the most feasible alternatives are summarized below.

1

Preferred Project in DEIR- Demolition and Replacement of MVMS Buildings. The preferred project evaluated in the DEIR, as described in Chapter 2, Project Description, considers replacing the 92,000 square foot main MVMS building and portable classrooms with three new school buildings on the existing MVMS campus. The new middle school building(s) would be constructed on the same site and have a similar maximum student and staff capacity as the existing campus. An interim campus of approximately 35 modular classroom buildings would be constructed in existing parking lots and open areas of the school property. As a result of the environmental analysis and refinement of the construction costs for the reconstruction project the District has concluded that this option is no longer feasible given the project budget.

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DEIR Alternative 5 - Renovation of Existing MVMS Facilities. The District has determined that renovation of the existing facilities is the most feasible approach to meet the primary project objectives and stay within the project budget. The Draft EIR considered this option as Alternative 5. Under this scenario, the existing facilities would be maintained and upgraded, including mechanical and accessibility upgrades, but the extent of renovation would not exceed the 50% remodel threshold that would require significant seismic or other building upgrades to the facilities or campus. The City generally supports this alternative, but we have some concerns with the interim impacts associated with accommodating the temporary campus adjacent to the MVMS renovation work.

DEIR Alternative 2: Interim Housing at Edna Maguire Elementary School. This alternative evaluated a temporary MVMS campus adjacent to the Edna Maguire ES campus to reduce students' exposure to construction impacts, and to minimize conflicts between the MVMS construction and regular school operations at an adjacent temporary MVMS campus. The City has concerns with transportation-related impacts generated by constructing and operating a temporary MVMS campus next to the Edna Maguire ES campus, as described below.

1 (cont.)

DEIR Alternative 4 - New MVMS campus adjacent to Edna Maguire Elementary School. We understand that if for some reason the District cannot proceed with renovation of the existing MVMS campus, the next most likely scenario may be to construct a new MVMS campus on the eastern side of the Edna Maguire ES campus. The Draft EIR considered this option as Alternative 4. Similar to DEIR Alternative 2 above, the City has concerns with transportation-related impacts generated by constructing and operating a new permanent MVMS campus next to the Edna Maguire ES campus, as described below.

CITY COMMENTS ON DEIR

Due to the potential for the Preferred Project and the Alternatives to impact City facilities and its residents, we offer the following comments on the DEIR for the District's consideration with the intent of improving the environmental analysis and mitigating impacts of the District's selected project alternative. The City will continue to collaborate with the District to ensure its selected design results in an optimal solution that meets the District's objectives and also minimizes impacts on City facilities and its residents. Our specific comments follow below.

Chapter 2, Project Description

2.5.2 Construction of Interim Campus

2

The Parking section discussing the Preferred Project (DEIR p. 2-9) states that "Temporary parking for the interim campus would be provided at neighboring properties, including the church parking lot and the wastewater treatment plant site, both of which are across Sycamore Avenue from the Project site . . . Additional spaces would be provided adjacent to the wastewater treatment plant as available." The District has not approached SASM regarding interim parking at the SASM site, and on-site parking is likely not available due to operational constraints. Please also note that six (6) of the 11 parking spaces in SASM's public parking lot at the end of Sycamore Drive are dedicated to public use through SASM's BCDC permit.

Docusign Envelope ID: 94A3C401-4E1F-49B9-B795-0B4E541F95CE

Construction Management Plan (CMP)
The District should work with the City's Department of Public Works to minimize construction impacts, including construction truck routes, traffic and construction worker parking. A CMP should exhibit and describe the construction staging, security fencing and management that would occur during the construction period, including the proposed use of the adjacent site for off-site parking, contractor parking, materials staging areas, delivery areas and truck routes. Identify off-site temporary office trailer locations and off-site material storage locations, if any, and appropriate permissions from property owner(s). Please note that the City has other potential construction projects in the surrounding area and would like to further coordinate with the District once the project is approved and a specific construction schedule is developed. 3

The CMP should also address school operations and traffic routing during the construction period. The City also requests that the District work closely with parents on an updated plan for school drop-off and pick-up (during both the interim construction phase and post-construction during regular operations) and ensure that parents do not use the City's Community Center parking lot.

Chapter 3, Environmental Setting, Impacts, and Mitigation Measures

3.7 Hazards, Hazardous Materials, and Wildfire
DEIR Section 3.7 addresses potential hazardous materials and health risk impacts to students and staff at the MVMS campus. DEIR Alternative 5, Renovation would minimize soil disruption of the existing campus and therefore avoid or minimize most health risks associated with construction. The mitigation measures specified in the DEIR, including those required by the State Department of Toxic Substance Control's (DTSC) would minimize health risk impacts to an acceptable level. It should be noted that the adjacent Mill Valley Community Center is also a sensitive receptor and public health protection measures should also address patrons of the Community Center, many of which are students. 4

3.8 Hydrology

Sea Level Rise
The District's Objective #6 for the MVMS project states: "Construct climate resilient and sustainable facilities and implement 'green building' practices" (DEIR p.ES-2). Sea Level Rise scenarios are discussed in DEIR pages 3.8-6 to 3.8-11. Impact 3.8.2 states the project could increase risk of flood hazards and concludes: "It should be noted that CEQA limits potentially significant impacts to those of the project on the environment, and not vice versa (unless a project substantially contributes to such impacts). Therefore, although the Interim Campus and portions of the permanent campus would remain increasingly subject to flooding from both runoff in major storm events and sea-level rise (especially with storm surges), impacts to stormwater runoff, flooding, and flood hazards would be considered less than significant" (DEIR p. 3.8-14). 5

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5 (cont.) On August 18, 2025, the Mill Valley City Council authorized a consulting contract to develop its own Subregional Adaptation Plan (SAP) evaluating sea level rise to complete an existing conditions and vulnerability assessment and an adaptation framework. The City will invite the District to be a stakeholder in the project's Working Group. Phase 1 of the SAP will focus on achieving the San Francisco Bay Conservation and Development Commission's (BCDC) Regional Shoreline Adaptation Plan Guidelines elements A-D (Planning Process, Existing Conditions, Vulnerability Assessment, Adaptation Strategies and Pathways.). This process is expected to conclude in April 2027. Phase 2 of the SAP will address Elements E-F: Land Use and Policy Plan, Implementation Plan and Funding Strategy, and is expected to conclude with the Council's adoption by March 2028 and later adoption by BCDC. The project website is: https://www.cityofmillvalley.gov/2186/Shoreline-Adaptation, and the City's contact for the SAP project is Mari Swim, Project Manager; mswim@cityofmillvalley.gov. Our comments related to the Sea Level Rise analysis in the DEIR are summarized in Table 1 below.

Table 1 – Sea Level Rise Comments

	Topic / Citation	Comment
6	Page 3.7-12 (Hazards)	Abbreviation for Ocean Protection Council (should be OPC, not OCP)
7	3.8-10-11 Regional Sea Level Rise Considerations	Regional coordination with BCDC guidelines, Marin County studies, and City of Mill Valley future plan not demonstrated. No clear definition around MVMS / District role or participation in these efforts or how MVSM plans to mitigate / adapt / protect itself from SLR flood risks. EIR does not investigate how construction at this site rather than retreat factors into SLR adaptation scenarios.
8	Site Elevations / AMSL references throughout document	Vertical datum not stated. The EIR references elevations (7–17 ft amsl) and SLR projections but does not specify the datum (NAVD88 or MSL). State vertical datum used in all sea-level and elevation references; ensure consistency between OPC (and other) data and site topography.
9	Flooding related Transportation & Emergency Access	No analysis of access routes or emergency response under SLR scenarios. Add analysis of flood exposure for main access roads and develop alternate routes or on-site sheltering plan. Current plan referenced, but more is needed for future scenarios where severity of flooding increases.
10	Project design life and planning horizon	Project design life not tied to SLR projections. The EIR should evaluate 2060 and 2100 scenarios given the expected life of school facilities (>50 years). Define design flood elevation based on OPC 2024 Intermediate-High scenario for 2100 and verify finished-floor elevations and utility placements.
11	Subsidence and Vertical Land Movement	Subsidence not analyzed. Local vertical land movement can affect relative sea level rise rates. Incorporate NOAA or USGS data on local subsidence to adjust relative SLR projections or justify why it is negligible.

Docusign Envelope ID: 94A3C401-4E1F-49B9-B795-0B4E541F95CE

12	Groundwater Rise	Groundwater rise impacts and contaminant mobilization are acknowledged but mitigation is not detailed. Add mitigation triggers and engineering controls (e.g., capping, barriers, monitoring wells) tied to groundwater elevation thresholds.
13	Combined Flood Risk	Combined flooding from rainfall + SLR + storm surge not modeled quantitatively. Model cumulative scenarios combining storm surge and 100-year rainfall; update drainage plan and mitigation measures accordingly.
14	Minimal to no reference to future mitigation for flood related access risks / hazards	No analysis of access routes or emergency response under SLR scenarios. Add analysis of flood exposure for main access roads and develop alternate route or on-site sheltering plan.
15	SLR Mitigation Measures	No adaptive management plan tied to SLR thresholds. Develop adaptive management plan with monitoring, triggers, and funding commitments for future adaptation actions.
16	SLR Risk to utilities	Vulnerability of critical utilities (power, water, communications) not analyzed for SLR exposure. Provide utility elevation map and specify minimum elevations or protection measures for critical equipment.

3.9 Noise

17 In the DEIR's discussion of sensitive receptors adjacent to the project site (DEIR p. 3.9-3), the Noise analysis neglects to identify the Mill Valley Community Center as a sensitive receptor. However, the analysis does include noise measurement adjacent to Friends Field (Noise measurement Site #3). Alternative 5, Renovation, would minimize noise impacts compared to the other alternatives. Any significant noise-generating activities such as site preparation and construction of a new STEM new building, if proposed, should incorporate noise mitigation measures as stated in the DEIR to protect students on the interim campus as well as visitors to the adjacent Community Center.

3.10 Transportation

18 The City has substantial concerns with the increased traffic that would result from either a temporary or permanent MVMS campus adjacent to the existing Edna Maguire Elementary School campus. The City contracted with Fehr & Peers transportation consultants to provide a constructive, independent assessment of the methods, assumptions, and conclusions of the DEIR's analysis of transportation-related impacts. The comments are summarized in Table 2 below.

Table 2 – Transportation Comments

Issue#	Section/Citation	Comment
19 1	General	It would be helpful for the traffic study to describe how mode choice might shift in each alternative as the location and density of students in each alternative changes. A shift from bike to car use may overwhelm specific turning movements at key

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19 (cont.)			intersections and shifts towards more cycling could affect pinch points along the Mill Valley Sausalito Path.
20	2	Pick up and Drop Off Operations	The pickup and drop off operations for each alternative should be discussed in more detail to better understand how each alternative's peak demand would be accommodated, including suggestions to minimize queues to spill back into the streets, or lead to behaviors that may have safety or operational issues, such as increased double parking, mid-block U-turns, speeding, etc. School pickup and drop off operations should exclude use of the Community Center parking lot.
21	3	Draft EIR Figure 17, pg. 3.10-3 Appendix G Traffic Study Figure 2, pg. 5	The westbound turning movements of the Camino Alto/Sycamore Avenue intersection are incorrectly shown as a shared through/left turn lane and dedicated right turn lane. Based on historical imagery, this configuration was converted to a dedicated left turn lane and a shared through/right turn lane sometime between 2019 and 2022. The "existing" intersection turning movement configuration should reflect conditions at the time of NOP issuance, which was in June 2024 (Appendix A of the EIR). Therefore, this figure and all associated analyses should be updated to reflect a dedicated left turn lane and a shared through/right turn lane for the westbound movements.
22	4	Appendix G Traffic Study Summary and Conclusions Alternative A, pg. 20	The text notes that the Edna Maguire School four-way stop control intersection at the exit and the intersection at the entrance with that has no traffic control would operate at LOS F; this is inconsistent with Table 2 presenting LOS C and LOS E, respectively, at those intersections.
23	5	Appendix G Traffic Study Summary and Conclusions Alternative A, pg. 20	The traffic study does not present potential operational improvements to address the projected LOS E operations at the Edna Maguire School entrance. While LOS is not considered a CEQA impact metric, it remains relevant to the City's General Plan and circulation policy objectives. Therefore, we request that the City and project team further evaluate alternatives to improve operations at this location—including but not limited to a configuration where the entrance driveway (approximately 24 feet wide) is striped or temporarily coned to provide two inbound lanes, allowing concurrent inbound turning movements from both the eastbound and westbound directions on Lomita Drive. This evaluation could inform project-level design or operational refinements considered as part of project approval, following completion of the CEQA process. Safety implications of these types of access changes should also be discussed.
24	6	Appendix G Traffic Study Summary and Conclusions Alternative A, pg.	Although improvements are not required at the Edna Maguire School exit intersection that would operate at acceptable LOS C, it is anticipated that most delay and queueing would be associated with the outbound movements from the school. The

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24 (cont.)		20	queueing associated with these movements is internalized within the school site, resulting in minimal impact to Lomita Drive.
25	7	Appendix G Traffic Study Summary and Conclusions Alternative B, pg. 20	It should be noted that potential impacts or adverse effects associated with Alternative B would be about 27 months. While this is temporary, we request the traffic study include specific transportation and safety-related recommendations to address the increased activity on the site with the various school age levels. Topics such as arrival and dismissal management, pick-up/drop-off design/operations, pedestrian and bicycle safety accommodations, traffic control needs, bus operations, parking and staff access are some topics that seem appropriate here.
26	8	Global	The bicycle/pedestrian connection between Lomita Drive and the Mill Valley-Sausalito Path (Bay Trail) is not considered as part potential impacts to bicyclists and pedestrians. The traffic study and EIR should evaluate potential hazards and policy consistency associated with the interaction between bicyclists and pedestrians using this access with project traffic on Lomita Drive. Furthermore, how the path would be affected by each alternative and potential safety or capacity implications at key locations along the path should be considered.
27	9	Global	We request that the consultant review and ensure the Traffic Study is consistent with the Local Road Safety Plan, and campus- specific documents including but not limited to the Safe Routes to School "Suggested Routes to School", Edna Maguire and MVMS Traffic Guidelines. We request the consultant review and provide additional assessment about how these proposed changes might require modifications to the current Traffic Guidelines at each campus. Links to these can be provided if the consultant doesn't already have them.
28	10	Draft EIR Chapter 5 Alternatives to the Project, pg. 5-1	The Draft EIR alternatives analysis does not address all four transportation-related significance criteria identified on pg. 3.10-8. We request expanding the alternatives analysis to address the four transportation-related significance criteria for each alternative. These criteria are: a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities; b) Conflict or be inconsistent with CEQA Guidelines §15064.3, subdivision (b); c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment); d) Result in inadequate emergency access.
29	11	Monitoring Program	We request that a process to monitor and respond to safety and operational issues be included in this document.

Docusign Envelope ID: 94A3C401-4E1F-49B9-B795-0B4E541F95CE

12	Suggestions to address future issues	We request the consultant add a list of improvements that the school district should consider to address traffic issues. Elements such as staggering bell schedules, managing pickup and drop off zones, additional crossing guards and traffic safety officers, signage, traffic control devices should be included as potential contingency options once the preferred alternative is implemented. Additional area for bike parking (including for e-bikes) should be addressed on campus to avoid spillover to other properties such as SASM and the Community Center, which is currently a problem.

30

Chapter 4 Growth Inducement, Cumulative Impacts, and Minor Issues

4.2 Cumulative Impacts

31

Additional cumulative projects that could add to impacts of the proposed project include a approved 45-unit multi-family housing project at 1 Hamilton Drive (next to the City's Public Safety Building), a 25-unit multi-family project with 2,240 sq. ft. of commercial floor area at 575 E. Blithedale Avenue (corner of E. Blithedale and Camino Alto), and a planned 4,000 square foot DPW administration building in the City's Corporate Yard. In addition, large multifamily and mixed-use projects are currently under construction at 500 Miller Avenue and 545 Miller Avenue.

We appreciate the District's continued communication and outreach to the City and its residents regarding the Middle School Reconstruction Project. Thank you for this opportunity to comment on the DEIR. Do not hesitate to contact me or other City staff if you require any information to complete the Final EIR. We look forward to continuing collaboration with the District on this project.

Sincerely,

Todd Cusimano

Todd Cusimano
City Manager

Responses to City of Mill Valley Comments

Response to Comment 1. The City's preferences regarding the Project and alternatives are noted. Please see Master Response 1.

Response to Comment 2. The District will re-evaluate the need for interim parking once the Project or an alternative is selected. The District acknowledges SASM's limitations regarding parking that may be available for District use during construction. Please note that parking supply and demand is not a potentially significant impact under CEQA.

Response to Comment 3. As requested in the comment, the District will work with the City's Department of Public Works in developing its Construction Management Plan (CMP) for the project. As requested, the CMP will address school operations and traffic during construction, and will include plans for drop-offs and pick-ups.

Response to Comment 4. All safety measures required by DTSC would be implemented during construction at the Sycamore Avenue site.

The sensitivity of the Mill Valley Community Center as a receptor is noted. Air Quality Impact 3.2.4 (page 3.2-17) presents the health risk assessment results. *Mill Valley Middle School Reconstruction Air Quality Technical Report* (RCH Group, 2025) (DEIR Appendix C, Attachment B, Figure B-1: Health Risk Assessment Sensitive Receptors) displays the sensitive receptors within 1,000 feet of the project site. The Mill Valley Community Center and Friends Field are located to the north of the project site. Health risk assessment receptors were placed throughout Mill Valley Community Center and Friends Field.

The health risk assessment due to construction activities was presented for sensitive receptors at Friends Field and Mill Valley Community Center (see page 3.2-24). As shown in **Table 3.2-21**, the maximum cancer risk from unmitigated construction emissions at the Friends Field and Mill Valley Community Center would be 8.2 per million. Notably, the maximum cancer risk from unmitigated construction emissions occurs at the Mill Valley Community Center and lower cancer risks (up to 5.86 per million) would occur at Friends Field. **Table 3.2-22** presents the maximum cancer risk from mitigated construction emissions at the Friends Field and Mill Valley Community Center would be 1.4 per million (0.86 per million at Friends Field). Thus, the cancer risk due to mitigated Project construction activities at the Friends Field and Mill Valley Community Center are less than the BAAQMD threshold of 10 per million, and would be **less than significant.**

Response to Comment 5. The City's initiation of work on its Subregional Adaptation Plan (SAP) or sea-level rise is acknowledged. Specific comments on sea-level rise as addressed in the EIR are discussed below.

Response to Comment 6. Comment noted – the abbreviation has been corrected.

Response to Comment 7. The Project is designed for the main building to be above the 60-inch sea-level rise level. Due to the size of the site, the Project does not include sea-level-rise retreat provisions because there is insufficient room to move structures further from the shoreline. Alternatives located on Lomita Drive would be outside of sea-level rise hazard areas. CEQA case law makes clear that EIR are not required to consider the impact of sea level rise on proposed projects. (*Ballona Wetlands Land Trust v. City of Los Angeles* (2011) 201 Cal.App.4th 455, 473-76 [holding that since CEQA does not require an EIR to identify the significant effects of the environment on a project, CEQA generally does not require an analysis of the impact of sea level rise on a project].) As recently acknowledged by the City in its Draft Subsequent EIR for the 2023-2031 General Plan Housing and Land Use Element Update (See Appendix A, p. 11 *available at https://www.cityofmillvalley.gov/748/Housing-Element-Update-2023-2031*), this is because CEQA is generally concerned with the impacts of the project on the environment rather than the impacts of the environment on the project. (*See also Citizens' Committee to Complete the Refuge v. City of Newark* (2021) 74 Cal.App.5th 460, 476-78.)

Response to Comment 8. The vertical datum used in the EIR Hydrology and Water Quality Chapter is NAVD88.

Response to Comment 9. Sea-level-rise related flooding on Sycamore Avenue is shown on Figure 15 in the EIR. More distant flooding from sea-level rise that may affect access to the school is not an impact of the Project on the environment. It is acknowledged that as sea level rises, access roads in low-lying areas throughout Mill Valley and surrounding areas will become more frequently flooded. This is a city-wide and regional issue that is discussed in the City's draft General Plan Safety Element available at https://www.cityofmillvalley.gov/2196/Safety-Element-Update-2025) and the Marin County Multi-Jurisdictional Hazard Mitigation Plan City of Mill Valley Community Profile (available at City-of-Mill-Valley-Community-Profile-Final-PDF) . As noted previously in Response to Comment 7 above, CEQA case law makes clear that EIR are generally not required to consider the impact of sea-level rise on proposed projects. (*Ballona Wetlands Land Trust v. City of Los Angeles* (2011) 201 Cal.App.4th 455, 473-76 [holding that since CEQA does not require an EIR to identify the significant effects of the environment on a project, CEQA generally does not require an analysis of the impact of sea level rise on a project].) This is because CEQA is generally concerned with the impacts of the project on the environment rather than the impacts of the environment on the project. (*See also Citizens' Committee to Complete the Refuge v. City of Newark* (2021) 74 Cal.App.5th 460, 476-78.)

Response to Comment 10. Sea-level rise at the Project site is described in detail on pp. 3.8-7-3.8-11 of the DEIR. Flood elevations of the Project building, if that option is selected by the District, will be refined in final Project design, and will include consideration of the OPC 2024 Intermediate-High scenario for 2100. The Renovation Alternative would not add sea-level-rise protection compared with existing conditions, and sea-level rise effects would be as described on pp. 3.8-6 through 3.8-10 in the DEIR.

Response to Comment 11. Land subsidence in the project area is an existing regional phenomenon and not an impact of the Project on the environment. Recent studies by NASA indicate subsidence of up to 0.4 inches/year in Corte Madera due to sediment compaction[6]. The Project site would experience different levels of compaction due to its specific location atop a former burn dump. According to the project geotechnical report the estimated total static settlement for retaining walls and other minor site improvements underlain by bay mud on footings consistent with the recommendations in that report is approximately 2 inches with a differential static settlement of approximately 1 inch over a lateral distance of about 30 feet presuming that sustained loads do not exceed 2 kips per foot[7]. Based on the proposed project and the groundwater level encountered during this evaluation, settlement from dewatering is not expected as a result of the proposed project. The Renovation Alternative would have no impact compared to existing conditions because the structures' foundations would remain in place and load would not be significantly increased.

Response to Comment 12. Groundwater rise from sea-level rise is described in the EIR Hydrology section. It is an impact of the environment on the project and not of the project on the environment; therefore it is not a potentially significant impact under CEQA. The EIR reports the effects of that rise in the Hazards and Hazardous Materials, and Hydrology chapters of the EIR for the decision-makers' consideration in evaluating the Project and alternatives.

Response to Comment 13. The commenter states the concern that, "[c]ombined flooding from rainfall + [sea level rise] +storm surge [are] not modeled quantitatively." However, as noted in Response to Comment 7 and Response to Comment 9 above, CEQA case law makes clear that EIR are generally not required to consider the impact of sea level rise on proposed projects. (*Ballona Wetlands Land Trust v. City of Los Angeles* (2011) 201 Cal.App.4th 455, 473-76 [holding that since CEQA does not require an EIR to identify the significant effects of the environment on a project, CEQA generally does not require an analysis of the impact of sea level rise on a project].) This is because CEQA is generally concerned with the impacts of the project on the environment rather than the impacts of the environment on the project. (*See also*

[6] https://www.science.org/doi/10.1126/sciadv.ads8163
[7] Ninyo and Moore, Geotechnical Evaluation and Geologic Hazards Assessment, Mill Valley Middle School, 425 Sycamore Avenue, Mill Valley CA. February 28, 2025.

Citizens' Committee to Complete the Refuge v. City of Newark (2021) 74 Cal.App.5th 460, 476-78.) The EIR is therefore not required to include the analysis referenced in this comment, and the EIR's focus on analyzing the potential impacts of the project on the environment is proper. The EIR's information and analysis is sufficient to serve its informational purposes. (*Ballona Wetlands, supra*, 201 Cal.App.4th at 476.) A lead agency is not required "to conduct every test or perform all research, study, and experimentation recommended or demanded by commentors." (CEQA Guideline § 15204.)

Response to Comment 14. The commenter states the concern that, "[n]o analysis of access routes or emergency response under [sea level rise] scenarios" is provided. Sea level rise is however an impact of the environment on the project, and as noted previously in Response to Comments 7, 9, and 13, CEQA case law makes clear that EIR are generally not required to consider the impact of sea level rise on proposed projects. (*Ballona Wetlands Land Trust v. City of Los Angeles* (2011) 201 Cal.App.4th 455, 473-76 [holding that since CEQA does not require an EIR to identify the significant effects of the environment on a project, CEQA generally does not require an analysis of the impact of sea level rise on a project].) This is because CEQA is generally concerned with the impacts of the project on the environment rather than the impacts of the environment on the project. (*See also Citizens' Committee to Complete the Refuge v. City of Newark* (2021) 74 Cal.App.5th 460, 476-78.) The EIR is therefore not required to include the analysis referenced in this comment, and the EIR's focus on analyzing the potential impacts of the project on the environment is proper. The EIR's information and analysis is sufficient to serve its informational purposes. (*Ballona Wetlands, supra*, 201 Cal.App.4th at 476.)

Emergency response and evacuation is analyzed more generally in Section 3.7.2, which concludes that the project would not impair or physically interfere with an adopted emergency response plan or evacuation plan. Further, first responders have vehicles capable of traversing shallow flood waters. The District currently has plans in place to address high-tide-related flooding in the parking lot area. At those times, the end of Sycamore Avenue is closed and traffic is re-routed to avoid the flooded areas (Julio Arroyo, MVSD Facilities Director, pers. com, November 10, 2025). In addition, the District will work cooperatively with the City and County on regional sea-level-rise strategies associated with this site. Please also see Response to Comment 9 above.

Response to Comment 15. The comment is correct that the project does not include an Adaptive Management Plan tied to issues. Protection of the project area, which includes the Sewerage Agency of Southern Marin's Wastewater Treatment Plant, would be part of a larger regional program to be undertaken by the City and County. The District would cooperate with any such plans when they are developed. Please also see Response to Comment 9 above.

Response to Comment 16. Comment 16 takes issue with the Draft EIR because the "[v]ulnerability of critical utilities (power, water, communications) [are] not analyzed for [sea level rise] purposes." Sea level rise is however an impact of the environment on the project, and as noted previously in Response to Comments 7, 9, 13, and 14, CEQA case law makes clear that EIR are generally not required to consider the impact of sea level rise on proposed projects. (*Ballona Wetlands Land Trust v. City of Los Angeles* (2011) 201 Cal.App.4th 455, 473-76 [holding that since CEQA does not require an EIR to identify the significant effects of the environment on a project, CEQA generally does not require an analysis of the impact of sea level rise on a project].) This is because CEQA is generally concerned with the impacts of the project on the environment rather than the impacts of the environment on the project. (*See also Citizens' Committee to Complete the Refuge v. City of Newark* (2021) 74 Cal.App.5th 460, 476-78.) The EIR is therefore not required to include the analysis referenced in this comment, and the EIR's focus on analyzing the potential impacts of the project on the environment is proper. The EIR's information and analysis is sufficient to serve its informational purposes. (*Ballona Wetlands, supra*, 201 Cal.App.4th at 476.)

As discussed previously, CEQA generally does not require an analysis of the impact of existing environmental conditions on a proposed project. (*California Building Industry Association v. Bay Area Air Quality Management District* (2015) 62 Cal.4th 369, 377.) In some cases, CEQA may require additional analysis where a project risks exacerbating environmental hazards or conditions that exist. (*East Sacramento Partnerships for a Livable City v. City of Sacramento* (2016) 5 Cal.App.5th 281, 296.) Here however, the Project would not exacerbate any are and therefore CEQA does not require any additional analysis of the impacts of sea level rise on the Project. (*Id.* at 296-97.)

In addition, the City of Mill Valley was awarded a Sea Level Rise Planning Grant from the Ocean Protection Council (OPC) in the Fall of 2024 that will be used to develop Mill Valley's first jurisdictional Sea Level Rise Shoreline Vulnerability Assessment and Shoreline Climate Adaptation Framework. The project is designed to meet the BCDC Regional Shoreline Adaptation Plan (RSAP) Guidelines, which were released in December of 2024. On August 18, 2025, the Mill Valley City Council adopted a resolution granting the City Manager the authority to enter into a contract with consultants to begin preparation of these studies and plans. Please also see Response to Comment 9 above.

Response to Comment 17. As requested in the comment, any construction at the Sycamore Avenue site would include mitigation measures as identified in the EIR, as applicable for the Renovation Alternative, if selected.

Response to Comment 18. Specific transportation-related comments are addressed in the following responses.

Response to Comment 19. Mode shifts for the various alternatives are not described because turning movement congestion is not a CEQA impact. In addition, the level of detail of analyses for alternatives under CEQA is less than that for the proposed Project.

Response to Comment 20. Pick-up and drop-off operations for both the Project and Lomita Drive sites are evaluated in the Transportation and Alternatives chapters of the EIR, respectively.

Response to Comment 21. The commenter is correct that the westbound approach has a shared through and right turn lane and a left turn lane. However, the SYCHRO traffic model would not model a shared through and right-turn lane. To model that lane configuration, we have now revised the analysis to show one left-turn lane and one right-turn lane, while reassigning the through volume as part of the right-turn volume. The resulting LOS for AM would be B for the existing condition, B for the cumulative condition with 2% added traffic, and C assuming 50% driving for the built scenario; The LOS for the PM is A, A, and B for the same three conditions. The revised intersection graphic and LOS calculation sheets are provided in Appendix B of this document.

In addition, as discussed in Master Response 3, transportation impacts for purposes of CEQA are no longer analyzed by way of LOS methodology and are instead analyzed through Vehicle Miles Traveled (VMT). Therefore, to the extent this comment relates to traffic and does not relate to significant environmental issues, no individual response need be provided, though this comment will be provided to the District Board of Trustees for their consideration in their project approval deliberations.

Response to Comment 22. The text on page 20 of the Transportation Appendix to the DEIR showing LOS C and F includes a clerical error. The correct LOS should be LOS C and E as indicated in Table 2 (see Table 2 in Appendix B to this document).

In addition, as discussed in Master Response 3, transportation impacts for purposes of CEQA are no longer analyzed by way of LOS methodology and are instead analyzed through VMT. Therefore, to the extent this comment relates to traffic and does not relate to significant environmental issues, no individual response need be provided, though this comment will be provided to the District Board of Trustees for their consideration in their project approval deliberations.

Response to Comment 23. CEQA does not require a similar level of analysis for alternatives as it does for the proposed Project, and a circulation study for each alternative is not required

under CEQA. Nonetheless, the EIR Alternatives analysis includes traffic analyses for some of the Edna Maguire/Terra Marin site alternatives, and additional information is provided below

Traffic LOS E for minor street approaches or turning movements at unsignalized intersections or intersections with no control, such as the subject intersection, would likely operate a lower service level, LOS E, as the movement does not have priority and must yield to other movements before entering the intersection. Standard traffic engineering practices consider this condition acceptable. Generally, investigation for improvements may be needed unless such movement has high traffic volumes, which is not the case with the subject location. We recommend placing a staff member at the driveway entrance to direct traffic when traffic conditions warrant. We believe stripping two inbound lanes at the entrance driveway to allow vehicles entering the driveway from both directions concurrently may be confusing to drivers and present a safety issue as vehicles turning into the driveway simultaneously from different directions, and then need to merge to get into the parking area.

Response to Comment 24. Comment noted. Queueing at the Edna Maguire/Terra Marin site is described in the EIR.

Response to Comment 25. Comment noted. If Alternative B is selected, a traffic Management Plan will be prepared for that school, as with all of the alternatives and the Project.

Response to Comment 26. The Project would not change any bike paths or associated intersection operations. Therefore no additional analysis is required.

Response to Comment 27. The traffic analysis for Alternative B in the Traffic Report cited by the commenter assumes staggered hours for the existing Edna Maguire School and the proposed Middle School. The proposed site plans have indicated various site accesses, internal circulation, and parking options. The EIR's traffic consultant's field observation indicated acceptable internal circulation during drop-off time; there were, however, vehicle queues around the internal circulation lane and the drop-off lane during the pick-up hour. Vehicle queues would reach up to 15 cars at times. Parking on the site was about 85% full during the pick-up time. These conditions lasted for about 20 to 30 minutes. Traffic generally moved well at both school entrances and exits, with queues of just several vehicles most of the time in all directions. The District would provide an in-depth evaluation and recommended improvements, including consideration of the Safe Routes to School Guidelines, should this become the selected alternative.

Response to Comment 28. CEQA does not require a similar level of analysis for alternatives as it does for the proposed Project. Nonetheless, the EIR Alternatives analysis includes traffic analyses for some of the Edna Maguire/Terra Marin site alternatives. As detailed in the DEIR,

the Project and alternatives would not have significant VMT impacts. Emergency access issues are addressed in Master Response 3 in this document.

Response to Comment 29. The District would monitor pick-up and drop-off traffic at whichever site is selected. In addition, a Traffic Management Plan would be developed for the selected option, and will include monitoring of operations.

Response to Comment 30. The District would develop a Traffic Management Plan for the selected project. The plan may include, but would not be limited to:

Edna Maguire School site:

- Place a staff member at the school entrance and exit to direct traffic.
- Place a staff member at the current drop-off, pick up lane to assist drop-off and pick up activities.
- Designate an area near the new classrooms for the proposed middle school drop-off and pick up.
- Stagger school hours for the two schools.
- Designate an area for school buses parking should school buses are used.
- Develop a carpool program for parents
- Designate Mill Valley-Sausalito Path for student pedestrian and bike access.

Terra Marin School site:

- Place a staff member at the school entrance and exit to direct traffic.
- Designate an area next to the new school building for drop-off and pick up.
- Designate the new parking lot for staff only.
- Develop a carpool program for parents and school staff.
- Designate Mill Valley-Sausalito Path for student pedestrians and bike access.
- Designate Shall Road, Meadow Drive, and Tower Drive as secondary access to the proposed middle school.

Response to Comment 31. The development projects identified in the comment have been added to the Cumulative Impacts section in Chapter 4 of the EIR, and the discussion of cumulative impacts on pp 4-3 and 4-4 is revised as follows:

A review of cumulative projects proposed in the City identified the following ~~one nearby~~ projects:

- ~~Wastewater Treatment Plant Rehabilitation Project, Phase 2 (Sewage Agency of Southern Marin) This project phase has been completed, so no overlapping impacts with the proposed project are anticipated.~~

- ~~According the City, additional cumulative projects in the vicinity of the proposed Project include~~ An approved 45-unit multi-family housing project at 1 Hamilton Drive, adjacent to the City's Public Safety Building,

- A 25-unit multi-family residential project with 2240 sq. ft. of commercial space at 575 E. Blithedale and Camino Alto,

- A planned 4000 sq. ft. Department of Public Works administration Building at the City's Corporation Yard, and,

- Two under-construction condominium projects at 500 and 575 Miller Avenue, with a total of 25 condominium units and 5,000 sq. ft. of commercial space.

The proposed project is a school replacement in kind for the existing school at the site and therefore its operations would not contribute in a cumulatively considerable way to any potentially significant cumulative impacts associated with other development in the area.

~~Because there are no cumulative projects in the project area, there would be no potential for the project to contribute to any local cumulatively considerable impacts.~~ Project contributions to regional cumulative impacts, such as air quality and greenhouse gas emissions, are addressed in those respective sections. No further analysis is required.

4. California Department of Toxic Substances Control

(Comment letter begins on the following page)

Department of Toxic Substances Control

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Secretary for
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October 20, 2025

Mr. Julio Arroyo
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DTSC COMMENTS ON MILL VALLEY SCHOOL DISTRICT'S DRAFT ENVIRONMENTAL IMPACT REPORT, MILL VALLEY MIDDLE SCHOOL RECONSTRUCTION PROJECT, MILL VALLEY SCHOOL DISTRICT, CALIFORNIA (STATE CLEARING HOUSE #2024060669)

Dear Mr. Arroyo:

The Department of Toxic Substances Control (DTSC) has reviewed the Draft Environmental Impact Report (DEIR), dated September 2025. The DEIR was prepared on behalf of the Mill Valley School District (MVSD or District herein) by Grassetti Environmental Consulting.

GENERAL BACKGROUND

The DIER states that the MVSD is proposing to redevelop an existing 10.2-acre portion of Mill Valley Middle School (MVMS), located at 425 Sycamore Avenue in Mill Valley, California (Site), by demolishing the existing middle school and constructing a new middle school. The Site is developed with the District offices and MVMS. The Site surface consists of hardscape (asphalt, concrete, and buildings) and landscape areas. A drainage channel (known as Ryan Creek) cuts across the northern portion of the Site oriented west to east and discharges into the Pickleweed Inlet (known as the Sausalito Canal) to the east of the Site.

The Site once operated as the Mill Valley Dump, a household waste landfill and burn dump from the early 1900s until closing in the 1950s. The dump operated for

approximately 50 years, burning waste if possible and spreading the remaining waste across the dump. The historical extent of the dump extends beneath properties located to the north and south of the Site. Prior to landfill operations, the Site was undeveloped tidal marsh. MVMS was built at the Site in 1969.

On April 15, 2024, DTSC and the District entered into an Environmental Oversight Agreement (EOA) regarding a Preliminary Endangerment Assessment (PEA) of the Site. The definition and requirements of a PEA are set forth in Education Code sections 17210, 17210.1 and 17213.1. The EOA only addresses the processes of performing site investigation activities and reporting the results of the investigation in a PEA Report. Should the results of PEA indicate response actions are necessary to address potential exposure risks to human health and/or impacts to the environment from contamination found at a site, the District may choose to enter into a Standard Voluntary Agreement with DTSC to oversee any supplemental site investigation and cleanup activities.

On October 16, 2024, DTSC approved of the District's workplan for the PEA, which included proposed sampling and testing of soil, soil vapor, groundwater, and surface water at the Site. Sampling and testing were completed in late 2024, and subsequently a Draft PEA Report, dated April 8, 2025, was submitted to DTSC for review and comment. Based on DTSC's review, and cited in our July 3, 2025 comment letter, DTSC concluded that Draft PEA Report was deemed insufficient for multiple reasons including, but not limited to, improper soil gas sampling procedures resulting in questionable data (i.e., the sampling of soil vapor happened during a rain event), and the use of bioattenuation for assessing potential risk to human health from breathing potentially contaminated indoor air. Using bioattenuation should not be used according to established DTSC vapor intrusion guidance.

Since our July 3, 2025, comment letter, the District's environmental consultant, Ninyo & Moore, had reportedly collected and analyzed additional soil vapor samples, although DTSC understands some of soil vapor sample points were not viable for sample collection due to shallow groundwater and/or moisture concerns which renders the data from laboratory analysis unreliable. In addition, and before DTSC was provided sufficient opportunity for its regulatory oversight and comment, the District's consultant collected additional surface soil samples in landscaped areas, and sub-slab soil vapor samples within the main campus building and the gymnasium. It should be noted that the District's consultant collected sub-slab soil vapor samples within the main campus and gymnasium, before DTSC could comment on the proposed sampling procedures and locations. DTSC understands that a revised human health risk assessment incorporating the additional soil and sub-slab soil vapor sampling results will be included in the revised PEA Report, which DTSC only recently received on October 17, 2025.

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COMMENTS ON THE DEIR

1. The DEIR states that the MVSD proposes to replace (reconstruct) the Mill Valley Middle School (MVMS) on its existing campus site; this reconstruction work at MVMS is referred to as "the Project". The DEIR states that it has been prepared for the District to evaluate the environmental effects of construction and operation of the Project, as required under the California Environmental Quality Act (CEQA). The DEIR states that the proposed Project consists of five phases: 1) construction of an interim campus for students to attend during the construction period, 2) demolition of the existing school buildings, 3) construction of the new school buildings and grounds, 4) operation of the new school, and 5), removal of the interim campus and restoration of recreation areas and parking on that part of the site.

   DTSC was recently informed that the District has now changed the current plan to reconstruct the existing campus site and instead focus on a renovation alternative for the existing MVMS. This alternative, identified as "Alternative 5: Renovation of Existing MVMS Main Building and Gym", would focus on renovating the interior and exterior of existing main campus building and the gymnasium, improving the heating, ventilation and air conditioning (HVAC) system and upgrading the fire sprinklers and electrical systems, and improving accessibility issues. A small building for science, technology, engineering and mathematics (STEM) education is proposed to be constructed. This alternative would also require 6th grade students to be relocated to an interim campus (presumed to be located on the existing MVMS campus) or relocated to the existing Edna Maguire Elementary School. The District Offices would be relocated to the Edna Maguire Elementary School or another existing District building. The DEIR states that this alternative would have similar impacts to the proposed Project, but with reduced grading noise, construction air quality/health risks, and dust impacts. The DEIR indicates that Alternative 5 would be the "Environmentally Superior Alternative". 3

   DTSC notes that the DEIR, specifically Chapter 3 – Environmental Setting, Impacts and Mitigation Measures, is focused mainly on evaluating the impacts to the environment based on the activities associated with the "Project" (i.e., full tear down and reconstruction of MVMS). Considering the District's plans now are to move forward, as DTSC understands, with renovating the existing campus, the DEIR lacks the necessary information - such as those presented in Chapter 3 for the Project - to fully evaluate the impacts and what mitigation measures are necessary to address the specific activities involved with Alternative 5.

2. DTSC and District representatives met on August 14, 2025, and August 15, 2025. During these meetings, DTSC understood that the District's plans changed to renovating the existing MVMS, instead of demolition and reconstruction due to costs of soil removal work associated with the Project. The DEIR is dated September 2025, so it is not clear why the District would rush to present an environmental impact report for public review and comment that did not present a comprehensive evaluation of environmental impacts reflecting the revised plan for the school. Presenting a CEQA document for review and comment, a majority of which is based on a project that the District considers no longer viable, is unproductive and does not serve the public interest. (4)

3. Section 5.6, Table 5.2 shows a comparison of alternatives to meet the Project objectives. The Table shows that for the column "Alternative 5. Existing MVMS Renovation", that three (3) out of the six (6) objectives (Objectives 2, 5 and 6 listed below) are only partially achieved.

   Objective 2 – Upgrade MVMS facilities to current educational, safety, security, and accessibility standards.

   Objective 5 – Address concerns related to projected future sea-level rise, odors, and site conditions. (5)

   Objective 6 – Construct climate resilient and sustainable facilities and implement "green building" practices).

   Apart from Alternative 1 (No Project), the Alternatives 2-4 are presented as alternatives that "substantially" achieve the objectives, so it is not clear why the District has chosen to pursue Alternative 5; DTSC notes some rational are presented in Section 5.7.

4. Section 5.7 of the DEIR is meant to present the "Environmentally Superior Alternative" to the proposed Project. In this section the DEIR states that the "Modernization Alternative (Alternative 5)" would have increased exposure to sea-level-rise and other flooding compared to the proposed Project and would not assure reduction of long-term health risks compared to the Project. In addition, the last paragraph in this section states that the "Rehabilitation Alternative" would be considered the most "Environmentally Superior Alternative" but that this alternative would only partially meet the Project's objectives. It's not clear what are the "Modernization Alternative" or the "Rehabilitation Alternative", as the main text of the DEIR identifies Alternative 5 as "renovation" of the MVMS. (6)

   Also, the DEIR states that the Dual Schools at Edna Maguire option also would substantially reduce impacts compared with the Project but would achieve more

6 (cont.) of the Project goals. This paragraph should explain the “goals” and why the District is now moving forward with Alternative 5 rather than Alternative 4.

5. Mitigation Measure 3.7-1 (see Table ES-1, and Mitigation Measures, Page 3.7-17) states that the Project Site shall be subject to mitigation as required by DTSC and the LEA (Lead Enforcement Agency) in “the Response Plan”. As explained above, DTSC and the District entered an EOA in April 2024, which only includes our oversight during the PEA process. While a PEA can include recommendations for response actions, DTSC is not aware of any proposed or approved “Response Plan” in the public record. Additionally, given the Project is now a renovation project rather that a reconstruction one, evaluation of the impacts of a “Response Plan” associated with Alternative 5 should reflect the specific actions needed for the renovation alternative. 7

6. Mitigation Measure 3.7-2 (See Table ES-12, and Mitigation Measures-Page 3.7.19) states that the District shall prepare and implement a Mitigation Plan. It is not clear if the term “Mitigation Plan” is the same as the “Response Plan”. Also, this section, in part, states that the District shall undertake additional sampling of soil in landscape areas and conduct sub-slab vapor sampling; and, if warranted based on the results, additional indoor air sampling. It should be noted that the District has already imposed this mitigation measure in August 2025, before the September 2025 date of the DEIR. DTSC has not been provided with a reasonable opportunity to review and comment on the additional sampling, as the revised PEA was only recently received on October 17, 2025. 8

7. The Table of Contents in the main text of the DEIR and in Volume 2, Appendices, identifies Appendix E as "Preliminary Endangerment Assessment and Post-Closure Land Use Plan Outline” (PEA and PCLUPO). However, the actual contents of Appendix E is a report titled “Human Health Risk Assessment" (HHRA), dated August 28, 2025, which is discussed in Section 3.7.1- Existing Conditions within the DEIR. It is not clear then whether the District intended on providing the PEA and the PCLUPO in the appendix, just the HHRA, or all these documents. Also, the HHRA appears to be based on preliminary data collected in 2024 and presented in the April 2025 draft version of the PEA Report. DTSC provided comments on the health risk assessment presented in the Draft PEA in a letter dated July 3, 2025 and concluded (as stated above), that the Draft PEA Report was deemed insufficient for multiple reasons including, but not limited to, improper soil gas sampling procedures resulting in questionable data (i.e., the sampling of soil vapor happened during a rain event), and the use of a bioattenuation factor for assessing potential risk to human health from indoor air, which according to DTSC vapor intrusion guidance, should not be used for assessing potential risk. DTSC is aware that additional data has been collected 9

9 (cont.) regarding soil and soil vapor, which may change or corroborate the level risk from hazardous chemicals currently presented in the DIER.

10 8. In Section 3.7.1 (Page 3.7.13) under the heading “Hazardous Materials in School Buildings, the DEIR states that pre-demolition hazardous building materials surveys were conducted at the MVMS in July 2024 and January 2025, and that these survey reports are included in Appendix E. As stated above, Appendix E includes a Human Health Risk Assessment dated August 28, 2025, which does not include these surveys mentioned.

11 9. In Section 3.9.2 - Impact and Mitigation Measures (specifically Impact 3.9.4 - second paragraph), reference is made to Appendix E for traffic noise level estimates. Again, Appendix E includes a Human Health Risk Assessment dated August 28, 2025, which does not include traffic noise level estimates.

12 10. In Section 4.5.1 - Energy (third paragraph), reference is made to “Appendix AQ”. The DEIR does not contain an Appendix AQ.

DTSC appreciates this opportunity to comment on the Mill Valley Middle School Reconstruction Project Draft Environmental Impact Report.

Sincerely,



Pete Ruttan, PG
Project Manager
Northern California Schools Unit
Site Mitigation and Restoration Program
Department of Toxic Substances Control

cc: (via email)

Ms. Lee Bryant – Marin County Environmental Health Services (EHS)
Mr. Greg Pirie, EHS
Ms. Tara Erfani, EHS
Ms. Stephanie Young, CalRecycle
Mr. Tim Crick, DTSC
Ms. Candace Hill, DTSC
Ms. Asha Setty, DTSC

Responses to California Department of Toxic Substances Control (DTSC) Comments

Response to Comment 1. The statement, "DTSC understands some of soil vapor sample points were not viable for sample collection due to shallow groundwater and/or moisture concerns which renders the data from laboratory analysis unreliable" is not accurate. During the July 2025 soil vapor sampling event, seven of the thirteen soil vapor probes were not impacted by shallow groundwater and/or moisture conditions and were able to be purged and sampled in accordance with DTSC's Active Soil Gas Investigations Advisory[8]. Additionally, no helium (used as the leak check compound) was detected in any of the soil vapor samples. There are no indications or reasons to suspect that the laboratory analytical data collected from the seven soil vapor probes in July 2025 is unreliable.

Response to Comment 2. In a virtual meeting between the District, DTSC, and Ninyo & Moore, on August 15, 2025, the results of the July 2025 soil vapor sampling event were presented to DTSC and DTSC was notified of the District's intent to collect sub-slab vapor samples to supplement the July 2025 results. On August 18, 2025, Ninyo and Moore notified DTSC via email that a sub-slab vapor and surface soil sampling work plan was being prepared and requested a meeting with DTSC to review the proposed sampling locations. DTSC denied the meeting request. On August 22, 2025, Ninyo & Moore submitted the work plan to DTSC and notified it of the sampling scheduled for August 30 and 31, 2025 with an invitation to observe. No response from DTSC was received until it provided comments on the work plan in a September 9, 2025 letter.

Response to Comment 3. The comment provides a brief summary of the Project as described in the Draft EIR before stating that the Draft EIR contains insufficient information regarding Alternative 5 (Renovation of Existing Middle School Main Building), which the Draft EIR indicates is the environmentally superior alternative. Specifically, DTSC indicates that the Draft EIR does not analyze Alternative 5 in as great a detail as the Project is analyzed in the Draft EIR.

To the extent this comment states that the description of this alternative in relation to the Project is insufficient, please see Master Response 6 for a discussion of the adequacy of the description of Alternative 5. Additionally, as noted in Master Response 6, the Final EIR will contain various revisions relating to the description of the alternative:

"Among other revisions, the revised description includes additional discussion of the sub-slab de-pressurization systems to address potential VOC concerns; includes a greater description of the grading activities and amounts of cut and fill required for the alternative; discusses the anticipated timing and construction schedule; and includes an expanded analysis of several of the analyzed environmental topics."

[8] DTSC, 2015. Advisory: Active Soil Gas Investigations. July.

In addition, as noted in Master Response 6 the Final EIR will contain an expanded discussion of several key environmental topics:

"The expanded discussion of environmental topics includes updates to the Air Quality discussion (updated in part to reflect a new detailed air quality assessment included in the Final EIR); the Cultural Resources and Tribal Cultural Resources discussion; and the Noise discussion (updated in part to reflect a new detailed noise assessment included in the Final EIR)."

Response to Comment 4. The comment raises the same issues as those in Comment #3, which claims that the Draft EIR's analysis of Alternative 5 is inadequate. The response to this comment is contained in Response to Comment #1 above, which itself incorporates Master Response 6. Further, as noted in Master Response 6, the revisions included within the Final EIR do not require recirculation of the Draft EIR since they do not change the conclusions set forth in the Draft EIR regarding this alternative.

Response to Comment 5. The comment questions whether the District should pursue Alternative 5 because the Draft EIR indicates that three of the six Project objectives (Objective 2, Objective 5, and Objective 6) would only be partially achieved. There is however no prohibition under CEQA from approving a project alternative that does not fully achieve all of a project's alternatives, and the inability of an alternative to fully achieve all project objectives does not, in and of itself, prohibit the lead agency from approving the alternative. The lead agency is only required to find an environmentally superior alternative infeasible before approving the project. (Public Resources Code Section 21081(a)(3); CEQA Guidelines Section 15091(a)(3).)

CEQA gives the lead agency authority to adopt a project alternative rather than a proposed project, particularly where the lead agency finds that the alternative will be less environmentally damaging than the project as proposed. (See, e.g., CEQA Guidelines Section 15002(a).) A major purpose of CEQA is to prevent significant impacts to the environment by encouraging agencies to impose changes in projects, including through the approval of alternatives to a project. (CEQA Guidelines Sections 15002(a) and 15021(a).) The lead agency has "the flexibility to implement that portion of a project that satisfies their environmental concerns" and a lead agency may approve an environmentally superior alternative to a project or an alternative that is superior to a project in other respects. (*Sierra Club v. City of Orange* (2008) 163 Cal.App.4th 523, 533; *Ocean St. Extension Neighborhood Association v. City of Santa Cruz* (2021) 73 Cal.App.5th 985, 1016.) A lead agency has the discretion to approve a revised version of the project even if that revised version was not considered in the EIR if it is similar in scope, size, and use as the evaluated alternatives and will not result in new significant impacts. (*Southwest Regional Council of Carpenters v. City of Los Angeles* (2022) 76 Cal.App.5th 1154, 1181-82.) DTSC does not have the expertise to direct the District on how it should weigh environmental

impacts outside DTSC's jurisdiction, such as tribal cultural resources, when determining the Environmentally Superior Alternative or how to weigh various policy considerations when selecting a project to approve.

The District has not yet chosen to proceed with Alternative 5 but has informed DTSC that Alternative 5 is more likely to be approved than the proposed project due to the financial constraints of the proposed project. The District's findings of approval will set forth its reasoning as to why the District approved the project or one of its alternatives. For example, the District may decide that the disruption to the Edna school community and surrounding neighborhood outweigh the benefits of a middle school facility at Terra Marin being less susceptible to sea level rise impacts.

CEQA Guideline 15204 states that "[c]omments are most helpful when they suggest specific alternatives or mitigation measures that would provide better ways to avoid or mitigate the significant environmental effects." That Guideline also cautions that a lead agency is not required "to conduct every test or perform all research, study, and experimentation recommended or demanded by commentors." Also, a responsible or trustee agency such as DTSC should focus its comments on environmental information germane to that agency's statutory responsibility. Here, DTSC's authority is derived from applicable laws related to protection of human health and the environment and does not extend to authority over, nor does DTSC have expertise regarding, how to weigh other environmental and policy factors relevant to the selection of a school modernization project.

The District may, in its discretion, approve Alternative 5 notwithstanding that Alternative 5 does not fully achieve all of the Project's objectives.

Response to Comment 6. The comment identifies an editing error in the EIR – the "Modernization Alternative" and "Rehabilitation Alternative" referenced as Alternative 5 in Chapter 5 are both referring to the "Renovation Alternative." The "Modernization Alternative" and "Rehabilitation Alternative", as Alternative 5 is referred to in Chapter 5, are both referring to the Renovation Alternative. For clarity, in the first sentence of the last paragraph on Chapter 5, "Rehabilitation" is revised to read "Modernization".

This comment states that Alternative 5, as discussed in the preceding Response to Comment #5, would only partially meet some of the objectives of the Project. Please refer to Response to Comment #5 for a discussion of this issue.

This comment also states that the EIR identifies Alternative 5 as the environmentally superior alternative and that Alternative 5 would have increased exposure to sea-level-rise and other potential flooding compared to the proposed Project and would not assure reduction of long-

term health risks compared to the Project. This is correct. While concerns regarding project sea-level rise are referenced in one of the project objectives, sea-level rise is not an impact for purposes of CEQA, which requires an analysis of impacts of a project on the environment. Instead, sea-level rise is considered an impact of the environment on a project, and CEQA generally does not require an analysis of the impact of existing environmental conditions on a proposed project. (*California Building Industry Association v. Bay Area Air Quality Management District* (2015) 62 Cal.4th 369, 377 [holding that agencies subject to CEQA are generally not required to analyze the impact of existing environmental conditions on a project's future users or residents].) The discussion of the environmentally superior alternative states "[t]his alternative would not assure reduction of long-term health risks compared to the Project." However, this simply reflects that complete redevelopment of the site with significant earthwork and new construction would likely have some incremental benefit to health risk compared to Alternative 5.

The discussion of Alternative 5 on page 5-29 of the DEIR states "As with the proposed Project, the modernization alternative would be coordinated with DTSC and the County LEA to ensure risks of long-term exposure to existing site contamination would be addressed, and would therefore be similar to the proposed project. A sub-slab depressurization system would be installed to control VOCs entering the building from the soil. It is assumed that the renovation would involve sealed windows and MERV-13 air filters, as with the Project." Based on this analysis EIR Table 5-2 accurately concludes that Alternative 5 would have equal or similar hazard impacts as the proposed project. In any event, seismic hazards and soil contamination are existing conditions of the site and are not Project impacts requiring analysis or consideration under CEQA.

CEQA itself does not specify in detail how the environmentally superior alternative is to be determined and accordingly the lead agency has discretion to determine which alternative is the environmentally superior alternative given that different alternatives may result in varying impacts on different topics. The purpose of analyzing alternatives generally is "to allow meaningful evaluation, analysis, and comparison with the proposed project." (CEQA Guidelines Section 15126.6.) The discussion of Alternative 5 in relation to the Project and the other alternatives satisfies this requirement and facilitates meaningful evaluation, analysis, and comparison with respect to potential significant impacts on the environment. Based on this analysis, the lead agency has weighed the various potential impacts on the environment with respect to various topics and the alternatives and the Project and has explained why it considers Alternative 5 to be the environmentally superior alternative. The Draft EIR selected Alternative 5 over Alternative 4 and other alternatives involving the Edna Maguire site primarily because of the risk of increased impacts to cultural and tribal cultural resources at that site compared to at the existing middle school campus. The lead agency has therefore met its obligations under CEQA.

The comment asks for clarifications of the “goals” of the Project. The reference to goals is a reference to the Project objectives.

Response to Comment 7. A “Response Plan”, now referred to as “Mitigation Plan”, was proposed in the Draft PEA Report submitted to DTSC on April 8, 2024 and in the PEA Report submitted to DTSC on October 17, 2025. Furthermore, because the site is located on a portion of the Mill Valley Dump, any project performed at the middle school (whether it be reconstruction or renovation) must be detailed in a Post-Closure Land Use (PCLU) Plan in accordance with California Code of Regulation (CCR) Title 27 Section 21190, which will be submitted to the Local Enforcement Agency (LEA), in this case Marin County Department of Environmental Health, for review and approval. CCR Title 27 Section 21190, requires mitigation measures such as vapor intrusion mitigation systems and adequate surface cover at the site to protect site occupants. A PCLU Plan would be considered a “Mitigation Plan” and will be required by the LEA. Mitigation Measure 3.7-2 has been revised to reflect that either, or both, DTSC and the LEA may have oversight over environmental conditions and protective measures associated with construction activities, and requires compliance with the Mitigation Plan and/or the Post Closure Land Use Plan such that any significant impacts (if any) would be mitigated to a level of insignificance and further imposes specific requirements to be incorporated into such plans. Such mitigation is permissible under CEQA as it identifies specific criteria the agency will apply in determining that the impact will be mitigated based on subsequent studies. (*See*, *e.g.*, *Ocean St. Extension Neighborhood Association v. City of Santa Cruz* (2021) 73 Cal.App.5th 985, 1010 [deferral appropriate where specific mitigation method or extent of mitigation depends on the results of a later study].)

Response to Comment 8. The term Mitigation Plan is synonymous with Response Plan. As the DTSC points out, additional soil sampling and sub-slab soil vapor sampling were conducted in August and September 2025 and the results were submitted in the October 17, 2025 revised PEA Report. A second round of sub-slab vapor sampling will be conducted in accordance with best practices to further evaluate potential risk. The District has committed to installing sub-slab ventilation systems at the site regardless of soil vapor or sub-slab vapor concentrations.

Response to Comment 9. The DEIR Table of Contents listing for Appendix E is in error – DEIR Appendix E is the Human Health Risk Assessment (HHRA) dated August 28, 2025.

The HHRA in the DEIR is based on data available at the time of publication of that document, which consisted of soil data collected in 2024 and soil vapor data collected in July 2025. Soil vapor data from December 2024 is not used in the HHRA for assessing risk (in accordance with DTSC comment) due to uncertainty associated with the results from the December 2024 sampling event. As stated above, soil vapor samples from the probes that were able to be collected in July 2025 did not contain issues associated with shallow groundwater and/or

moisture conditions and are considered reliable. The HHRAs for the proposed project and Alternative 5 have been updated to include data collected after publication of the DEIR.

In regards to use of a bioattenuation factor, DTSC's vapor intrusion guidance[9] Attachment 2, promotes approaches for petroleum vapor intrusion screening at non-UST sites and provides petroleum-specific recommendations when screening buildings for potential vapor intrusion. One of these approaches involves using oxygen data from site samples to apply a bioattenuation factor to petroleum hydrocarbons in addition to the default attenuation factor. The middle school site is a non-Underground Storage Tank release site and oxygen data was available and showed a potential bioattenuation zone at the site; therefore, Ninyo & Moore's initial use of a bioattenuation factor to petroleum hydrocarbons for the purpose of initial site screening was done in accordance with DTSC's vapor intrusion guidance. However, based on more recent soil vapor data, the revised PEA Report, which includes more recent soil vapor data, presents risk assessments without the use of a bioattenuation factor.

Response to Comment 10. The referenced reports are not included in an appendix, but rather are included in the references documents available for review on the District's website for the Project.

Response to Comment 11. The reference to DEIR Appendix E identified in the comment is a typographical error. Traffic noise levels are described in DEIR Appendix F, Noise Technical Study.

Response to Comment 12. The "Appendix AQ" reference in the 3rd paragraph of the Energy discussion on p. third full paragraph on p. 4-4 of Chapter 4 is a typographical error; the reference is hereby corrected to "Appendix C, Air Quality".

[9] California Environmental Protection Agency, 2023. Supplemental Guidance: Screening and Evaluating Vapor Intrusion, Final Draft. February.

5. Marin County Environmental Health Services Division Comments

COUNTY OF MARIN

COMMUNITY DEVELOPMENT AGENCY
ENVIRONMENTAL HEALTH SERVICES DIVISION

October 20, 2025

Mill Valley School District
Attn: Dr. Elizabeth Kaufman
411 Sycamore Avenue
Mill Valley CA 94941

Subject: **Mill Valley Middle School Reconstruction Project Draft Environmental Impact Report (EIR) Comments**

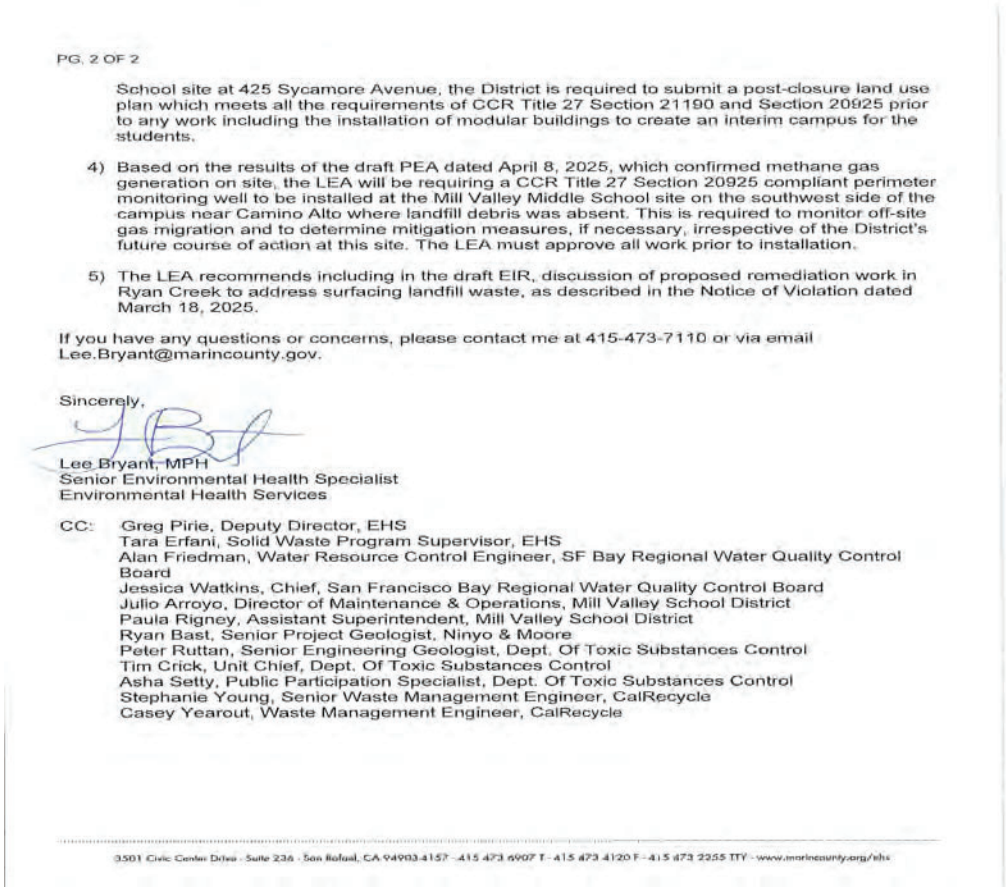
Dr. Kaufman:

The Marin County Environmental Health Services, acting as the Local Enforcement Agency (LEA), has regulatory oversight of closed landfill sites. The Mill Valley Dump, which includes the Mill Valley Middle School, ceased accepting waste prior to January 1, 1988, and is subject to the LEA's regulatory oversight that to ensure it meets State Minimum Standards as defined in California Code of Regulations (CCR) Title 27 Section 20164. These are minimum requirements to ensure that these disposal sites do not currently pose a threat to public health, safety and/or the environment. In addition, these sites are required to comply with applicable sections in CCR Title 27, Division 2, chapter 3, Subchapter 5, Article 2 for Postclosure Land Use per Section 21190 and when applicable Section 20925.

The LEA has reviewed the Mill Valley Middle School Reconstruction Project draft EIR dated September 2025. The project description in the draft EIR indicates that the school will be reconstructed. Although the LEA is aware that the Mill Valley School District (herein after called the "District") has moved away from the reconstruction project, our comments are based on the project description and alternatives in the draft EIR released.

1) The information and discussion in the draft EIR are not based on a completed Preliminary Endangerment Assessment (PEA). The final PEA was released on October 17, 2025, for public comment. The California Department of Toxic Substances Control (DTSC) has not yet fully evaluated and commented on the final PEA.
2) During recent meetings with The District, the LEA understood the District was no longer pursuing the reconstruction of the school as described in the draft EIR project description but, will choose either relocating the middle school to another site or renovation of the current site buildings. It was also the understanding of the LEA that the renovation alternative would no longer include the construction of the proposed "STEM" building. Because the information presented in the draft EIR was focused mainly on the original plan to reconstruct the school at its current site, and not the alternatives, a thorough evaluation of the alternatives cannot be completed.
3) If the District moves forward with the original project description or any of the alternatives which require either new construction, reconstruction, deconstruction, subsurface exploration, installation of mobile classrooms, or renovation of existing buildings at the Mill Valley Middle

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PG. 2 OF 2

School site at 425 Sycamore Avenue, the District is required to submit a post-closure land use plan which meets all the requirements of CCR Title 27 Section 21190 and Section 20925 prior to any work including the installation of modular buildings to create an interim campus for the students.

4) Based on the results of the draft PEA dated April 8, 2025, which confirmed methane gas generation on site, the LEA will be requiring a CCR Title 27 Section 20925 compliant perimeter monitoring well to be installed at the Mill Valley Middle School site on the southwest side of the campus near Camino Alto where landfill debris was absent. This is required to monitor off-site gas migration and to determine mitigation measures, if necessary, irrespective of the District's future course of action at this site. The LEA must approve all work prior to installation.

5) The LEA recommends including in the draft EIR, discussion of proposed remediation work in Ryan Creek to address surfacing landfill waste, as described in the Notice of Violation dated March 18, 2025.

If you have any questions or concerns, please contact me at 415-473-7110 or via email Lee.Bryant@marincounty.gov.

Sincerely,

Lee Bryant, MPH
Senior Environmental Health Specialist
Environmental Health Services

CC: Greg Pirie, Deputy Director, EHS
Tara Erfani, Solid Waste Program Supervisor, EHS
Alan Friedman, Water Resource Control Engineer, SF Bay Regional Water Quality Control Board
Jessica Watkins, Chief, San Francisco Bay Regional Water Quality Control Board
Julio Arroyo, Director of Maintenance & Operations, Mill Valley School District
Paula Rigney, Assistant Superintendent, Mill Valley School District
Ryan Bast, Senior Project Geologist, Ninyo & Moore
Peter Ruttan, Senior Engineering Geologist, Dept. Of Toxic Substances Control
Tim Crick, Unit Chief, Dept. Of Toxic Substances Control
Asha Setty, Public Participation Specialist, Dept. Of Toxic Substances Control
Stephanie Young, Senior Waste Management Engineer, CalRecycle
Casey Yearout, Waste Management Engineer, CalRecycle

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Responses to Marin County Environmental Health Services Department Comments

Response to Comment 1. Please see Responses to California Department of Toxic Substances Control Letter, Comments 3 and 4, above regarding the PEA information used in the EIR. Please also see Master Response 7.

Response to Comment 2. Please see Responses to California Department of Toxic Substances Control Letter, Comments 3 and 5, above, regarding the PEA information used in the EIR. Please also see Master Response 6.

Response to Comment 3. The District will prepare a Post Closure Land Use Plan for the site prior to the commencement of any construction activities that will address the specific scope of the project approved by the District which will be provided to Marin County Department of Environmental Health for review. The proposed mitigation measures for the Project include Mitigation Measure 3.7-1, which itself expressly references the Post Closure Land Use Plan, stating as revised in the FEIR that "[t]he Project Site shall be subject to mitigation as required by DTSC and/or the LEA in the Mitigation Plan and/or the Post Closure Land Use Plan (PCLUP)." Mitigation Measure 3.7-1 goes on to clarify that "[t]he PCLUP shall include construction safety protocols and requirements, including preparation of a Health and Safety Plan, a Community Air Monitoring Plan, and measures for safe excavated waste handling" and that "[t]he PCLUP will

also specify foundation design for the Interim Campus." Therefore, in part due to compliance with the applicable Mitigation Measures, the Project will require the preparation of a Post Closure Land Use Plan prior to the commencement of any construction activities.

Response to Comment 4. The District will install the requested perimeter monitoring well if technically feasible.

Response to Comment 5. The Ryan Creek remediation referenced in the comment is not a part of the proposed project, but rather is a separate project with independent utility that has been ongoing and will not rely on the Final EIR for CEQA clearance.

6. Southern Marin Fire District Comments

From: **Steven Ross** <sross@cityofmillvalley.gov> Date: Mon, Oct 27, 2025, 5:23 PM
Subject: SMFD comments regarding MV Middle School Project To: Julio Arroyo <jarroyo@mvschools.org>
Cc: Fred Hilliard <fhilliard@smfd.org>, mramiro <mramiro@smfd.org>

Hello Julio,

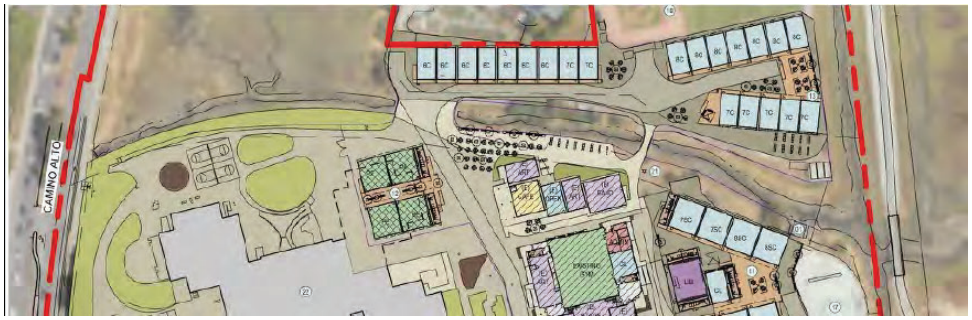
Fred Hilliard, Division Chief / Fire Marshal of Southern Marin Fire District provided comments on the Middle School project to me last Tuesday, October 21, after the formal DEIR public comment period had closed. I said I would reformat the comments and send them to you for your consideration as you prepare the Final EIR and as the District selects its preferred alternative and proceeds with more detailed plans to implement the project.

SMFD's comments are provided in red italicized text below, after each section of text and graphics copied from the DEIR.

Don't hesitate to reach out directly to Fred if you have any questions. Thank you.

CHAPTER 2 - 2.5.2 Construction of Interim Campus
New portable buildings would be organized into “grade-level villages” to the extent possible. Due to the absence of “wet” utilities from the existing playground area, classrooms that require sinks, restrooms, and buildings that may require fire protection (sprinklers) would be located south of Ryan Creek. The existing MP/Gym, Arts, cafeteria, and classroom portables and adjacent site areas would remain intact as part of the temporary campus. The existing PE portables would be relocated. Several restroom buildings are located along the south edge of the creek to limit travel distance as much as practical. The interim campus would be separated from adjacent construction areas and public spaces by fencing and other physical barriers as appropriate.

COMMENT: The temporary campus is proposed to be active from August 2026 until January 2030. SMFD is unclear if all of these buildings would be considered temporary or if they would require fire sprinklers. Would a manual fire alarm be required instead of fire sprinklers?





Temporary Campus - Summer 2025

Accessible path-of-travel (POT) across the two existing creek bridges would be maintained. Emergency vehicle access (EVA) also would be maintained along the west bridge crossing and between the new portable clusters.

COMMENT: Being familiar with this site, we will not have emergency vehicle access along the backside of some of these buildings. In addition, the cluster located on the northwest end of the campus does impede that road way too much. It currently is super tight, and this will more than likely make it around 10'-11' for the access road. Since SMFD does not have scaled plans, the exact width cannot be confirmed. SMFD should evaluate future plans to confirm adequate emergency vehicle access.

CHAPTER 2 - 2.5.4 PROPOSED PERMANENT NEW SCHOOL AND FIGURE 6
The Project would include the construction and operation of two new connected two- story classroom buildings (Buildings A and B) with floors organized into grade level clusters (pods) that include 8 general classrooms, 2 special education classrooms, and 2 science labs per grade level, along with support spaces. Special education programs would be co-located with grade level students ensuring their integration with other students of similar age. Ground level of the south pod building (Building A) would include school administration spaces, wellness center, library, and media room. The buildings also would have outdoor learning areas/walks. Primary campus access is provided and secured by a roofed “portal gateway” between the two classroom buildings.



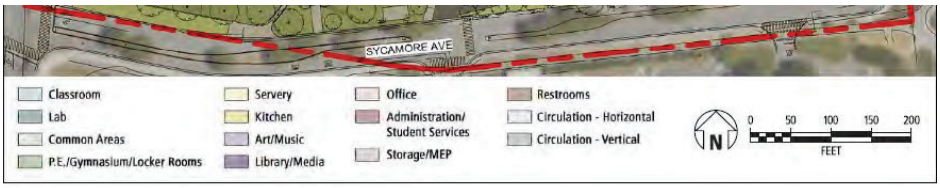


Figure 6
Proposed New School 2nd Floor Site Plan

Source: Lionakis | Architecture | Interior Design | Structural Engineering

COMMENT: If this plan for a new MVMS campus at Edma McGuire, SMFD should evaluate the plans for emergency access. Access route to the back of buildings A and B is unclear; maybe there is vehicle access proposed between the (e) Building M and (n) Building A? While the buildings are only "two- stories," the exact height of these buildings is not provided. SMFD will require more information about vehicle access around the structures prior to approval.

CHAPTER 3 - 3.10.2 IMPACTS AND MITIGATION MEASURES

Topics with No Impact

The Project would not impair or physically interfere with an adopted emergency access plan. The Project would involve using the existing roadways accessing the existing school (Camino Alto and Sycamore Ave.). The access road would be properly maintained and is and would continue to be designed to provide adequate circulation for emergency vehicles, especially fire engines. These topics are not further discussed in this analysis.

The Project also would not alter existing bike and pedestrian access to the school. In addition, it would not conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities These topics are not further discussed in this analysis.

COMMENT: The report does not specifically discuss road closures or impacts during the construction stages in sufficient detail for SMFD review and comment. The construction impacts discussion should address impacts to emergency vehicle access or response. Emergency vehicle access on Sycamore Ave and Camino Alto need to maintained in order to provide responses during the construction period. This area is considered by the City and the County as a known Community Area of Refuge. That designation may need to change during the construction period if there the refuge area is not to sufficient to function as such.

Steven Ross | Senior Planner | sross@cityofmillvalley.gov City of Mill Valley | 26 Corte Madera Avenue | 415-384-4805

Responses to Southern Marin Fire District Comments

Response to Comment 1. Fire Alarms in the Interim Campus? None of the existing or new temporary campus buildings would have fire sprinklers. The existing gymnasium building and four existing portable buildings (café, classroom, art, and band) north of the gymnasium are planned to remain after the temporary campus buildings are removed. All other new and existing portable buildings are intended to be temporary and would be removed. A new fully automatic fire alarm system, extended from the existing campus system, with voice evacuation capability is proposed for the interim campus. The interim campus system would include full area smoke detection and speaker strobe notification system components. No sprinkler monitoring would occur (because no sprinklers).

Response to Comment 2. Emergency Access to the Interim Campus. Further review of the Interim Campus plans by SMFD is anticipated. During the preliminary pre-application meeting 10/29/24, it was noted that the existing emergency access between PE portables and creek is ~12'-0". The proposed Interim Campus would increase this to ~14'-0" (by paving gravel shoulder adjacent to creek), but the width would be less than the standard 20'; this reduced width will require SFMD and MVSD approval.

Response to Comment 3. Emergency Access to the Permanent Campus. After completion of additional design work, further review of the Interim Campus plans by SMFD is anticipated. Emergency vehicle access is proposed throughout the site including along the north side of Buildings A & B and between Buildings A & M. These buildings are ~43ft in height from finish grade to highest roof line.

Response to Comment 4. Road Closures during Construction. The project does not anticipate any full road closures for any extended periods of time. There would likely be partial closures for utility work. There would also be temporary traffic control in these areas for larger deliveries that would impact local traffic temporarily. None of these partial closures would prevent emergency vehicle access. Therefore, the project would not affect emergency access from off-site to the school.

Individual and Private Organization Comments

1. Fabia Butler Comments

From: Fabia R Butler <fabiarbutler@gmail.com>
Date: Thu, Sep 4, 2025 at 7:24 AM
Subject: MVMS Relocation
To: jarroyo@mvschools.org <jarroyo@mvschools.org>

As a long time resident of the Alto neighborhood, I am furious of the potential to ruin our community by relocating MVMS to the Edna Maguire and Terra Marin campus. Our streets are already dangerous with speeding cars going to and from Edna, plus mosque traffic on Lomita and Shell Road several times a day.
For those of us who like to walk, bike and stroll our kids and grandkids, it will be impossible to do so.

Even with staggering school start times, the amount of traffic would be overwhelming for this neighborhood.

Please consider the extreme impact to those of us who live here. It's obvious that the current site on Miller, situated on a main thoroughfare is the ideal location.

Fabia Butler

Response to Fabia Butler Comment

This comment letter raises potential concerns regarding the relocation of MVMS to the Edna Maguire/Terra Marin campus. Specifically, this comment raises potential concerns relating to traffic and traffic safety. To the extent this comment raises concerns regarding community quality and opposition to any alternatives, please see Master Response 1, above. In any event, the concerns regarding community quality expressed in the comment are acknowledged and such comments will be forwarded to decisionmakers for their consideration in project approval deliberations.

Traffic issues associated with potential alternatives involving the Edna Maguire/Terra Marin campus are described in the Alternatives chapter of the EIR and are generally addressed in Master Response 3, above.

2. Anita Forbes Comments

From: **Anita Forbes** <anitaforbes@gmail.com>
Date: Sat, Sep 6, 2025 at 11:43 AM
Subject: comments to Draft EIR
To: <jarroyo@mvschools.org>

Hi,
I would like to share some comments on the Draft EIR. I want to express my support for the option of having the permanent middle school campus at Edna Maguire, either with dual schools at Edna Maguire/Terra Marin or having the middle school take over the Edna Maguire site (with relocation of primary school students). I would also not object to the alternative of housing all middle school students in temporary housing at Edna Maguire while the current middle school is being reconstructed. I would strongly object to placing any middle school students in temporary housing at the MVMS site while the current middle school is reconstructed. If that option were selected, I would regretfully transfer my child out of Mill Valley school district rather than have her attend school in temporary housing adjacent to the construction site.

I think that building a new permanent middle school at Edna Maguire best satisfies the goals of the initial project. Parents, students and community members have looked forward to having a new, modern middle school–reconstructing the old middle school would not satisfy that expectation. A reconstructed middle school would also be a poor choice because it would continue to be plagued by noxious odors, would potentially be negatively impacted by sea level rise, and staff/students could still have potential health impacts from being above a former dump site.

Further, if the decision were made to house students in temporary buildings at the MVMS site during reconstruction, those students/staff would be impacted by construction noise, dust, odors, and potential health impacts. Although mitigation is expected to diminish some of these concerns, things do not always go as predicted, and there could still be unexpected health impacts even with mitigation. Especially if the noise, odors, and distractions to students in temporary housing at the MVMS site are significant, the district should also expect to lose an unknown number of students to private schools during the construction (and once they have left, many students are unlikely to return even after construction is completed)

Although concerns have been raised regarding traffic if Edna Maguire is chosen as the site of either a temporary or permanent middle school, I believe the district's plan of staggering stop/start times and having a shuttle bus from the other elementary schools should alleviate those issues. The district could also consider a bus/shuttle that would stop at a number of other central points to pick up students, in addition to at the elementary schools. This would further reduce traffic, and would help the district's goals

of becoming more “green”, and of substantially reducing pollution by reducing the number of cars on the road.

Thank you for your consideration and hard work on this complicated project.

Anita Forbes

Responses to Anita Forbes Comment

This comment letter raises potential concerns regarding the proposed Project and further expresses support for several alternatives relating to the development of the Edna Maguire and Terra Marin campuses. To the extent this comment letter expresses opposition and or support for the Project or any alternatives, such comments are generally not considered comments on issues related to physical environmental conditions or impacts disclosed and evaluated as part of the Draft EIR and, therefore, do not warrant a response under CEQA. Please see Master Response 1.

This comment letter also raises potential concerns regarding noise, dust, and odor impacts associated with locating interim housing at the MVMS site. A detailed discussion of such topics is included in those respective chapters (e.g., Noise and Air Quality) in the EIR.

This comment also raises various concerns regarding traffic issues associated with potential alternatives involving the Edna Maguire/Terra Marin campus, which are described in the Alternatives chapter of the EIR and further addressed in Master Response 3, above.
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3. Leslie Ciitroen Comments

From: Leslie Citroen <leslie184@gmail.com>
Date: Sun, Sep 7, 2025 at 11:22 AM
Subject: Opposition to Lomita site To: <jarroyo@mvschools.org>

Hello
I am writing to proclaim my opposition to building a new middle school on Lomita.

I am a resident of Lomita – and traffic was a huge problem before the school district rebuilt Edna and built a large parking lot. Once the lot was built our parking issues went away

I am hearing that they want to build a middle school next door. This is ridiculous. The streets can not handle all that traffic. Our lives will be turned upside down. My children went Edna and the middle school – and I know how the traffic flows. We always found it convenient to use the community center for pickups – since the roads were congested.

The traffic would now back up throughout Mill Valley if the new school is to be built here. Cars already back up on East Blithedale. The site is very small.

I suggest they knock down the administration building at the middle school and build a 2-3 story structure.

Sincerely
leslie citroen

Responses to Leslie Citroen Comments

This comment letter raises concerns regarding traffic issues associated with potential alternatives involving the Edna Maguire/Terra Marin campus, which are described in the Alternatives chapter of the EIR and further addressed in Master Response 3, above.

This comment letter further expresses various preferences regarding the Alternatives analyzed within the EIR. Please see Master Response 1 regarding preferences of alternatives.

4. Benson Kaukonen Comments

From: **drkanga@aol.com** <drkanga@aol.com>
Date: Mon, Sep 8, 2025 at 10:22 AM
Subject: Mill Valley Middle School
To: jarroyo@mvschools.org <jarroyo@mvschools.org>

Dear Mill Valley Planning Persons:

I am writing as a long time resident of Scott Valley and Mill Valley. I strongly encourage the refurbishment of the existing school facilities rather than constructing new buildings.

Thank you for your consideration,

Benson L. Kaukonen
Scott Valley

Responses to Benson Kaukonen Comments

This comment letter expresses an opinion regarding the Project and the alternatives analyzed in the Draft EIR. Please see Master Response 1 regarding comments expressing a preference or opinion on the Project and the analyzed alternatives.

5. Harry and Brigitte Smith Comments

From: **Bill Smith** <bill@smith2.com>
Date: Tue, Sep 9, 2025 at 9:31 AM
Subject: NO Middle school construction at Edna mcquire school site
To: <jarroyo@mvschools.org>, Bill Smith <bill@smith2.com>, Brigitte Smith <bsmith9894@aol.com>

Dear school board ,

We protest .

Vote NO to this construction site option.

1 Site utilization requirements outstrip small site capabilities.

2 unacceptable and unsolvable citywide, neighborhood , off and onsite Pedestrian and vehicle Circulation problems

3 completely exceeds unacceptable site density user population rationale.

4 existing middle school site greatly exceeds short and Long term planning Benefits

Regards,
Harrry and Brigitte Smith

Responses to Harry and Brigitte Smith Comments

This comment letter expresses various opinions regarding preferences for the Project and alternatives analyzed in the Draft EIR. The comment's opinions are noted and are responded to in greater detail in Master Response 1 regarding preferences of Project and alternatives.

This comment letter also raises various concerns regarding traffic and circulation issues. Traffic issues associated with potential alternatives involving the Edna Maguire/Terra Marin campus are described in the Alternatives chapter of the EIR and are further addressed in Master Response 3, above.

This comment letter also includes various statements relating to site capacity and long term planning benefits. While these comments do not appear to implicate any issues for

purposes of CEQA that require a response, such comments are addressed in Master Response 4.

6. Alex and Robert Duvall Comments

From: **Alex & Robert Duvall** <theduvalltribe@gmail.com>
Date: Tue, Sep 9, 2025 at 12:00 PM
Subject: MVMS EIR DRAFT FEEDBACK
To: <jarroyo@mvschools.org>

Hello there-
I want to share a few reflections and requests as you continue to weigh decisions around the middle school project:

Many in our community find it difficult to process and respond to information without ample time to consider the implications. This is particularly true given the funding timeline and the multiple stakeholders involved. Based on the data available, it seems that temporarily housing students in portables on the existing middle school site — and renovating the current facility — is the most practical option.

If the costs for portables are consistent regardless of location, then placing students at 70 Lomita introduces additional expenses: demolition costs, the loss of long-term tenants, and the cost of busing students to the site. By contrast, keeping students at the larger middle school site avoids these burdens. Unless data indicates that the existing campus is unsafe for students or staff, the more fiscally responsible and educationally sound choice is to renovate in place.

I recognize that construction on an active school site is not ideal. However, delaying or diverting resources to appease a small, vocal group of opponents risks preventing our middle school from ever receiving the updates it desperately needs. I urge the board to make this difficult decision with the broader community in mind, not just the loudest voices in the room.

I have also heard from parents at other elementary school sites who are still wondering whether Edna Maguire's campus — and the adjacent property at 70 Lomita — could ultimately become a permanent middle school location. This possibility raises several concerns.

Building a permanent middle school at 70 Lomita would require a number of regulatory and environmental steps that could significantly impact both the project timeline and the use of existing bond funds, including but not limited to:

- **Environmental Review (CEQA/NEPA)**
- **Records Search and Survey**
- **Tribal Consultation**
- **Mitigation Planning**

- **Inadvertent Discovery of Human Remains**

These are not small considerations. They represent real risks to our budget, our timeline, and ultimately, the students and families depending on this project. I worry that pursuing 70 Lomita for a permanent middle school could jeopardize the timely delivery of the upgrades our community has long been promised.

Best,
Alex Duvall

Response to Alex and Robert Duvall Comments

This comment letter expresses various opinions and concerns regarding preferences for the Project and alternatives analyzed in the Draft EIR. The comment's opinions and concerns are noted and are responded to in greater detail in Master Response 1 regarding preferences of Project and alternatives.

This comment also discusses the potential for construction of a middle school at the Edna Maguire campus. Construction of a permanent middle school at the Edna Maguire campus was initially evaluated in Chapter 5, Alternatives, in the DEIR. This comment generally raises various topics of concern and considerations that were previously analyzed in the Draft EIR. In any event, these opinions and concerns are noted and are generally responded to in greater detail in Master Response 1 regarding preferences of Project and alternatives.

Specifically, archeological and tribal cultural resources issues associated with the Edna Maguire/Terra Marin site are addressed on pp. 5-12 and 13 of the EIR, which includes a mitigation measure for potential impacts to archaeological resources. Tribal consultation is further ongoing.

To the extent this comment also raises issues relating to budgetary concerns, CEQA does not require analysis of project financial issues except in determining feasibility of mitigations and alternatives, or if there may be indirect physical impacts from the financial impacts. Please see Master Response 1 and Master Response 5 for a discussion of financial issues and feasibility.

7. Mark Steiner Comments

From: **Mark Steiner** <marksteinersf@gmail.com>
Date: Tue, Sep 9, 2025 at 2:45 PM
Subject: MVMS
To: <jarroyo@mvschools.org>

Although we are unable to attend the MVSD Board Meeting, we are deeply concerned that moving the Mill Valley Middle School to a campus next door to Edna Maguire will cause terrible traffic and other congestion in and around Lomita Drive.

We strongly feel, therefore, that the Mill Valley Middle School location should remain at its current location at 425 Sycamore Street.

Thank you.

Mark Steiner

Responses to Mark Steiner Comments

This comment letter expresses various opinions and concerns regarding preferences for the Project and alternatives analyzed in the Draft EIR. The comment's opinions and concerns are noted and are responded to in greater detail in Master Response 1 regarding preferences of Project and alternatives.

8. Laura Schierberl Comments

From: **Laura Schierberl** <laura@schierberl.com>
Date: Tue, Sep 9, 2025 at 12:08 PM
Subject: Comment on EIR for MVMS
To: <jarroyo@mvschools.org>
Cc: <letterstotheboardoftrustees@mvschools.org>

Hello,

I'm a current parent at Edna Maguire with a 5th grader and 3rd grader. I also live in the Alto/Horse Hill neighborhood on Shell Rd. Given I have a rising middle schooler and live in the area that would be impacted by these plans, I wanted to provide a response to the EIR for the construction/renovation of MVMS.

I understand that the current plans have been narrowed down to two options:

1. Renovate the existing middle school at Sycamore Avenue.
2. Build a new middle school at 70 Lomita (aka Terra Marin)

These two alternatives would require temporary housing during renovation/construction. Options include:

26) Portables for 6-8 graders onsite at the current Sycamore campus.
2. Demolishing Terra Marin and placing portables at 70 Lomita

I wanted to express my support for renovating the existing middle school and housing the 6th-8th graders in portables at the Sycamore campus for the following reasons:

- The results of the EIR clearly demonstrate that renovating the existing middle school and placing temporary student housing in portables on site is SAFE.
- Building a new middle school at 70 Lomita OR building temporary student housing at this site would cause Lomita Drive and the surrounding neighborhoods to be flooded with excessive traffic.
- Keeping the 6th-8th graders in one location is crucial so they build community and culture together. We do not want to divide the middle school teachers, counselors and administrators between different temporary school sites.
- A new middle school or temporary housing at 70 Lomita school would result in requiring elementary and middle school students to share playing field space at Alto Field and gymnasium space. Developmentally, it is best for these different age groups to have their own separate play spaces.
- Edna recently underwent a major renovation that was completed in 2018. The school community should not have to undergo another large disruption.

Thanks for your time,
Laura

Laura Schierberl

Responses to Laure Schierberl Comments

This comment letter expresses various opinions and concerns regarding preferences for the Project and alternatives analyzed in the Draft EIR. The comment's opinions and concerns are noted and are responded to in greater detail in Master Response 1 regarding preferences of Project and alternatives.

This comment letter also expresses various concerns regarding the potential for excessive traffic in relation to the alternatives proposing to redevelop a portion of the Edna Maguire/Terra Marin campuses. Traffic issues associated with potential alternatives involving the Edna Maguire/Terra Marin campus are described in the Alternatives chapter of the EIR and addressed in Master Response 3, above.

9. Gus & Arlene Fiume Comments

Gus & Arlene Fiume
P.O. Box 998
Mill Valley, California 94942-0998
Fairlyart@live.com

September 9, 2025

Mill Valley School District
Attn: Julio Arroyo, Director of Maintenance and Operations
411 Sycamore Avenue
Mill Valley, CA 94941

Dear Mr. Arroyo:

We have reviewed the recent MVMS proposals and are against any relocation; temporary or permanent, of Middle School students to or adjacent to the Edna Maguire Elementary School campus.

We have lived in Mill Valley for over 45 years and our children have attended Edna Maguire, Mill Valley Middle and Tam High school.

When the Edna Maguire School expanded the traffic in the surrounding area became congested and remains so. The addition of Middle School children in any way, shape or form will be disastrous because not only will we be unable to drive between 8-9am and 2-3pm M-F but we couldn't even use the Multipath because the Middle schoolers on ebikes are a menace to any pedestrians walking and particularly elderly pedestrians.

We recommend that the Middle School classes be housed temporarily on the adjacent fields in portables as was done with Edna Maguire classes during their renovation and that the current Middle School be renovated as the permanent site for MVMS.

Sincerely,
/s/Arlene & Gus Fiume

cc: Scott Valley Homeowners Association

Responses to Gus and Arlene Fiume Comments

This comment letter expresses various opinions and concerns regarding preferences for the Project and alternatives analyzed in the Draft EIR. The comment's opinions and concerns are noted and are responded to in greater detail in Master Response 1 regarding preferences of Project and alternatives.

This comment letter also expresses various concerns regarding the potential for traffic in relation to the alternatives proposing to temporarily or permanently redevelop a portion of the Edna Maguire/Terra Marin campuses. Traffic issues associated with potential alternatives involving the Edna Maguire/Terra Marin campus are described in the Alternatives chapter of the EIR and addressed in Master Response 3, above.

10. Liz Davis Toth Comments

From: **Liz Davis Toth** <lizmariedavis@gmail.com>
Date: Wed, Sep 10, 2025 at 10:24 AM
Subject: {MVMS Reconstruction Project] Comments on EIR
To: <jarroyo@mvschools.org>
Cc: Marty Toth <mvtoth@gmail.com>

Julio,

I am writing to voice my comments on the Draft EIR for Mill Valley Middle School. I have two children at Edna Maguire (Grades 1 & 4) and a child at Mill Valley Middle School (Grade 6).

I strongly recommend the following options:

1) Renovate the existing Middle School at Sycamore Ave.
2) During renovation, portables for 6-8 graders at the current campus.

There are a multitude of reasons.

- Displacement of West America Taekwondo: Since 1983, WATKD has been a locally-owned and beloved community dojo. It is an integral part of the Edna Maguire community as A new middle school or temporary housing at 70 Lomita would displace this important community resource.
- Both of my sons attend aftercare and do TKD through West America. It has been critical to have reliable childcare as both my husband and I work full time (and for other working parents). If this goes away, there are no backup options that could support this influx of demand. My boys have learned a lot from Tae Kwon Do and have grown and matured based on the classes with Chantal and Roger.

- Confidence in the Safety of Renovations and Temporary Housing On Site: We are confident that **the results of the EIR clearly demonstrate that renovating the existing middle school and placing temporary student housing in portables on site is SAFE.** We are confident that the state's highly-regulated building requirements for schools would ensure that appropriate steps are taken to mitigate any potential hazards during construction.

- Keep Middle Schoolers Together: We strongly feel that keeping 6th-8th graders in one location is crucial. We want to keep the middle school students together as they build community and culture together in anticipation of joining high school together. **We do not want to divide the middle school teachers, counselors and administrators between different temporary school sites.**

- **New HVAC System To Mitigate Sewer Plant Smell:** The nearby Sewage Treatment plant has already implemented practices to minimize unsavory smells at the middle school**. A renovation of the existing building on Sycamore Ave would allow for new HVAC systems to be installed that would further mitigate this concern.**

- **Disruption of Edna Maguire Community:** Edna recently underwent a major renovation that was completed in 2014. The school community should not have to undergo another large disruption. **Constructing a new middle school, or building temporary housing for any portion of 6th-8th graders would cause upheaval and significant disruption for the students, teachers, and staff of Edna Maguire.**

- **Traffic Concerns:** Building a new middle school at 70 Lomita OR building temporary student housing at this site would cause Lomita Drive and the surrounding neighborhoods to be flooded with excessive traffic. This would place a significant traffic burden on the Alto-Sutton neighborhood and surrounding community. Proposed staggered drop-off and pick-up times would only prolong the periods of bottleneck traffic that occurs on Lomita Drive. Implementing a bus system to service 80 Lomita would be excessive in cost (~$750k/year). **Renovating the existing middle school building maintains a central location that continues to support students walking and biking to school.**

Thank you in advance for considering my comments to this important decision impacting my family and the larger Mill Valley community.

Responses to Liz Davis Toth Comments

This comment letter expresses various opinions and concerns regarding preferences for the Project and alternatives analyzed in the Draft EIR. The comment's opinions and concerns are noted and are responded to in greater detail in Master Response 1 regarding preferences of Project and alternatives.

This comment letter also expresses various concerns regarding the potential for traffic in relation to the alternatives proposing to temporarily or permanently redevelop a portion of the Edna Maguire/Terra Marin campuses. Traffic issues associated with potential alternatives involving the Edna Maguire/Terra Marin campus are described in the Alternatives chapter of the EIR and addressed in Master Response 3, above. This comment letter also expresses concerns regarding the potential displacement of West America Taekwondo Dojo. Please see Master Response 2 for a discussion of this topic.

11. Michael Cool Comments

From: **Michael Cool** <macool41@gmail.com>
Date: Wed, Sep 10, 2025 at 8:30 PM
Subject: Mvms opposition to lomita campus
To: <jarroyo@mvschools.org>

Dear Mill Valley School District,

I strongly urge you not to displace West America TKD & After Care from its Lomita Dr. location. For 42 years, this dojo has been more than a building—it's been a safe, supportive community where children and families learn discipline, confidence, and respect.

Losing this space would disrupt a legacy that has shaped generations. Please find a solution that allows the middle school renovation to move forward without forcing West America TKD from the home it has built with this community.

Thank you for your consideration.

Sincerely,
Michael.cool

Response to Michael Cool Comments

This comment letter expresses various concerns regarding the potential displacement of West America Taekwondo Dojo. Please see Master Response 2 for a discussion of this topic.

12. Leatitia Comps Agrar Comments

From: **Laetitia Comps-Agrar** <laetitia.comps@gmail.com>
Date: Wed, Sep 10, 2025 at 9:04 PM
Subject: MVSD Middle School Renovation – opposing option 2
To: <jarroyo@mvschools.org>

Dear Julio,

It was brought to my attention that a draft EIR has been proposed and discussed for the renovation of the MVSD Middle school renovation.

The main project makes sense and addresses the needs of the community. I wanted to raise my concern about the alternative option 2 to create a new campus at 70 Lomita. There is a vibrant and caring community for our kids attending elementary school, the West America Taekwondo aftercare program and the actual Taekwondo classes. These programs are critical to provide our kids with the appropriate care, education and sport's practice our community needs. Moving the middle school to 70 Lomita would undoubtedly result in a negative impact on the Edna Maguire community and will increase the city traffic congestion. In addition, the current centralized location of the middle school is ideal to provide an opportunity for our children across MV to go to school by themselves (walking or biking), which again is suitable to reduce traffic in MV and give an opportunity to kids to be responsible and get physical activity before their day in school.

Thank you for giving careful consideration to this message,

I appreciate the work you are doing for our community,

Best regards,

Laetitia Comps-Agrar
415-858-8225

Responses Leatitia Comps Agrar Comments

This comment letter expresses various opinions and concerns regarding preferences for the Project and alternatives analyzed in the Draft EIR. The comment's opinions and concerns are noted and are responded to in greater detail in Master Response 1 regarding preferences of Project and alternatives.

This comment letter also expresses various concerns regarding the potential for traffic in relation to the alternatives proposing to temporarily or permanently redevelop a

portion of the Edna Maguire/Terra Marin campuses. Traffic issues associated with potential alternatives involving the Edna Maguire/Terra Marin campus are described in the Alternatives chapter of the EIR and addressed in Master Response 3, above. This comment letter also expresses concerns regarding the potential displacement of West America Taekwondo Dojo. Please see Master Response 2 for a discussion of this topic.

13. Lisa Klann Comments

From: **Lisa Klann** <lisa.klann@gmail.com>
Date: Wed, Sep 10, 2025 at 12:28 PM
Subject: Public Comment on MVMS EIR – Klann Family
To: <jarroyo@mvschools.org>
Cc: Adam Klann <aklann@gmail.com>

Hello Julio,

I attended the MVMS Modernization info meeting at Park Elementary this morning. I am submitting a Public Comment from myself and my husband (Adam Klann – co-signed) regarding the Draft EIR. Please see below for our info:

Lisa & Adam Klann
12 Del Casa Dr
Mill Valley, CA 94941

Phone (Lisa): 414-803-7895
Phone (Adam): 415-209-8879

Comments on the Draft EIR:

Adam and I are supportive of the Mill Valley School District moving forward with plans to renovate the existing Middle School (at its current site) while temporarily housing the students also at the current Middle School site (425 Sycamore Ave) while the Middle School is being renovated. We have reviewed the Draft EIR, and we feel confident that there will not be negative health risks to students or staff if MVMS is remodeled/renovated at its current site, nor do we have concerns about health, safety, or environmental risks to the students if they remain temporarily housed on the current MVMS campus while the renovations/construction takes place. We have two children – ages 10 and 7 (currently at Park Elementary), and our 10 year old will be starting at MVMS in June 2026, which means he will be attending middle school in Mill Valley during the proposed modernization project timeline. As such, we are highly motivated to ensure that the MVSD is able to enact a plan to modernize MVMS that is in the best interests – from a safety, educational, and facilities standpoint – of incoming and future MVMS students.

We prefer renovating the school at its current site, and also keeping students on the current campus (in temporary housing) during the renovation for the following reasons:

27) We'd like to see 6-8 grades kept together during the modernization project, so they can build community and not be separated over the multi-year span of this project and as they prepare for high school in grade 9.

2) We are concerned that moving students to a new or temporary middle school near Edna Maguire Elementary would cause significant logistical and traffic challenges for transporting large numbers of children to/from school, in a limited space and on roads not currently handling these levels of traffic. We also would not like to see general education funds purposed towards busing kids to/from the temporary middle school, as we prefer having these funds used for instructional uses to directly support MVSD kids in the classroom. The current MVMS is centrally located and accessible by all members of the Mill Valley community – we would like to keep the school where it is, so as to not negatively impact those who reside near Edna with an entire new MVMS campus in their community, and also to not negatively impact the ability of Mill Valley families to get their kids to/from school from all areas of town.

3) We think using the 14 acre existing campus will enable the MVSD to best support all of the educational needs for MVMS students (and give room for the school to grow, if enrollment increases in the future). We are concerned that building a new middle school on a limited space of only 4 acres by Edna Maguire would negatively impact the children's learning environment and space for outdoor activities/extracurriculars. We note that a 4 acre footprint falls below CA state regulatory recommendations, but the current 14 acre campus is within regulatory recommendations.

4) We also trust the MVSD and board of trustees to make decisions that are in the best interest of our children, as we believe they are genuinely committed to carrying out this project in a way that is safe and best suited to support the community's learning/educational needs. They seem to have put a lot of effort and due diligence into making sure the project is carried out safely and with the community's best overall interests at heart. We want to express our support for them, as they move forward with this project.

Thank you for your consideration of our comment.

All the best,

Lisa & Adam Klann

Responses to Lisa Klann Comments

This comment letter expresses various opinions and concerns regarding preferences for the Project and alternatives analyzed in the Draft EIR. The comment's opinions and concerns are noted and are responded to in greater detail in Master Response 1 regarding preferences of Project and alternatives.

This comment letter also expresses various concerns regarding the potential for traffic in relation to the alternatives proposing to temporarily or permanently redevelop a portion of the Edna Maguire/Terra Marin campuses. Traffic issues associated with potential alternatives involving the Edna Maguire/Terra Marin campus are described in the Alternatives chapter of the EIR and addressed in Master Response 3, above.
This comment letter also raises concerns regarding the adequacy of the Edna Maguire campus with respect to regulatory recommendations. This topic is addressed in Master Response 4, above.

14. Erin Davis Comments

From: **Erin Davis** <erinpjones@gmail.com>
Date: Wed, Sep 10, 2025 at 12:40 PM
Subject: In opposition to the option of using the Lomita (& Edna) campus
To: <jarroyo@mvschools.org>
Cc: West America Tae Kwon Do <westamericatkd@gmail.com>

Dear Julio,

I am writing to express my strong concern about the proposed remodel at Lomita and Edna Maguire, which would displace the after-care center currently serving families in our community. This program is not just a convenience — it is a vital institution that supports working parents, provides safe and reliable supervision, and enriches the lives of countless children.

Removing or displacing this center without a clear and accessible alternative would create a serious gap in services and hardship for many families who depend on it daily. The strength of our schools comes not only from academics, but from the broader support system they provide to the community. The after-care program is a cornerstone of that system.

I respectfully urge you to reconsider or revise the construction plans to preserve this essential resource for our children and families

Thank you for your help!

Erin Davis
(310) 415-9971

Responses to Erin Davis Comments

This comment letter expresses various opinions and concerns regarding preferences for the Project and alternatives analyzed in the Draft EIR. The comment's opinions and concerns are noted and are responded to in greater detail in Master Response 1 regarding preferences of Project and alternatives.

Though not directly referenced in the text, this comment letter also appears to express concerns regarding the potential displacement of West America Taekwondo Dojo. Please see Master Response 2 for a discussion of this topic.

15. Sabrina Lo Comment

From: **Sabrina Lo** <sabrina_lo_5@yahoo.com>
Date: Wed, Sep 10, 2025 at 12:47 PM
Subject: MVMS Modernization Project- keep to 1 campus
To: <jarroyo@mvschools.org>

Hello Mr. Arroyo,

My name is Sabrina Lo. I am a parent of a 7th grader currently attending MVMS as well as a 4th grader who will eventually attend MVMS. I am writing to urge you to keep MVMS as one campus instead of splitting the MVMS campus across the current Sycamore site and the Edna McGuire site. Keeping all the students to one site keeps a cohesiveness within the student body and allows all the grades to inhabit the same space and experience middle school as it should be, not a strange disjointed split campus. In addition, both my kids attend classes at West America Tae Kwon Do, which would be displaced with a split campus. My kids have had a wonderful and enriching experience at West America and look forward to attending their classes and participating in their after school program.

To be fair, it was the school board's responsibility to assess the soil quality of the current site prior to making firm plans and the students should not be punished by being separated by this lack of due diligence.

Thank you for you time,
Sabrina Lo, parent and concerned voter
Sent from my iPhone

Responses to Sabrina Lo Comment

This comment letter expresses various opinions and concerns regarding preferences for the Project and alternatives analyzed in the Draft EIR. The comment's opinions and concerns are noted and are responded to in greater detail in Master Response 1 regarding preferences of Project and alternatives.

This comment letter also expresses concerns regarding the potential displacement of West America Taekwondo Dojo. Please see Master Response 2 for a discussion of this topic.

16. Mario Viela Comments

From: **Mario Vilela** <vilelafmario@gmail.com>
Date: Wed, Sep 10, 2025 at 1:05 PM
Subject: Opposition to Using Lomita & Edna Campus for Middle School Project
To: <jarroyo@mvschools.org>

Dear Julio Arroyo,

I am writing to oppose the proposal of using the Lomita and Edna campus for the middle school renovation project. Relocating the West America TKD and After Care program would displace a long-standing community resource that has supported families for over 40 years.

This dojo is more than a building. It has provided a safe space for children and families to build confidence, discipline, and lifelong community bonds. Removing it would not just move an activity, it would disrupt a cornerstone of the community.

I respectfully urge the district to find solutions that allow the renovation to move forward without forcing the closure or relocation of this deeply valued program.

Thank you for your consideration.

Best,
Mario

Response to Mario Viela Comments

This comment letter expresses various opinions and concerns regarding preferences for the Project and alternatives analyzed in the Draft EIR. The comment's opinions and concerns are noted and are responded to in greater detail in Master Response 1 regarding preferences of Project and alternatives.

This comment letter also expresses concerns regarding the potential displacement of West America Taekwondo Dojo. Please see Master Response 2 for a discussion of this topic.

17. John Ezak Comments

From: **Johnezak** <Johnezak@comcast.net>
Date: Wed, Sep 10, 2025 at 1:15 PM
Subject: Middle school at 70 Lomita
To: <jarroyo@mvschools.org>

Good morning
I believe if someone from your office came down to Edna Maguire at drop off you would realize that the barely 2 lane road is not sufficient for all the extra cars the Middle School would create. " If you build it they will come" but you will have created an incredible problem with traffic. I am sure there are safety concerns as well.

Thank you

Responses to John Ezak Comments

This comment letter expresses various opinions and concerns regarding preferences for the Project and alternatives analyzed in the Draft EIR. The comment's opinions and concerns are noted and are responded to in greater detail in Master Response 1 regarding preferences of Project and alternatives.

This comment letter also expresses various concerns regarding the potential for traffic in relation to the alternatives proposing to temporarily or permanently redevelop a portion of the Edna Maguire/Terra Marin campuses. Traffic issues associated with potential alternatives involving the Edna Maguire/Terra Marin campus are described in the Alternatives chapter of the EIR and addressed in Master Response 3, above.

18. Meredith Brown Comments

From: **Meredith Brown** <meredith.lee.brown@gmail.com>
Date: Wed, Sep 10, 2025 at 1:27 PM
Subject: Renovate, Don't Relocate – Mill Valley Middle School
To: <jarroyo@mvschools.org>
Cc: <letterstotheboardoftrustees@mvschools.org>, <snakatani@mvschools.org>, <nkatz@mvschools.org>, <eabdoli@mvschools.org>, <mcrncichhodge@mvschools.org>, <yyoo@mvschools.org>

Director Arroyo and MVSD Board Members,

As a resident of the Alto-Sutton neighborhood where the relocation is being suggested (I live at 63 Meadow Dr.), I urge you to ***renovate*** the middle school at its current location – with temporary 6th-8th grade housing in portables on site – and ***not*** relocate to the 70 Lomita location.

Issue #1: More traffic and increased car danger for our small neighborhood where sidewalks are sparse
I have a 1 year old and the thru-traffic is already a concerning issue for our streets. We have very few sidewalks and have to navigate very carefully walking with small children and strollers on our street. Currently, those who drive through to bypass traffic on Blithedale or cut through to reach Edna McGuire, are often driving fast and paying little attention to the kids playing and cars pulling out of driveways. Adding an entirely new middle school to the same neighborhood on 70 Lomita would only make this issue much, much worse. I'm scared to think what the traffic situation and increased danger would be like if the middle school was relocated to Lomita.

Issue #2: Current location is central, which makes it easier for kids to walk and bike to school and decreases pollution from additional cars on the road
At a time when pollution from fossil fuels is STILL on the rise, even with our increased knowledge of resulting climate change and climate disasters, we need to be thinking about the future we're leaving for our children. By relocating the middle school to a less central location, there will be more cars on the road, more traffic, more pollution, and increased health related issues (e.g., exposure to air pollution increase childhood instances of childhood asthma) and increased rate of climate change. We're talking about a middle school where we're educating our youth – what kind of example are we setting if we relocate their school to a less central location and thus remove their ability to walk or bike to school?

Issue #3: The Lomita location rests on a known Coast Miwok archaeological site

Also troubling, 70 Lomita sits on a known Coast Miwok archaeological site. Disturbing these sacred grounds for the sake of a relocation that serves no clear educational purpose would be irresponsible and disrespectful to our local history.

Issue #4: Parking concerns for a new middle school located at 70 Lomita
As I walk by Edna regularly during drop-off and pick-up with my baby in my stroller, I see parents and caregivers struggling to find parking. I have seen them parking blocks away on neighboring streets simply to then run to Edna to make it in time. There is clearly already an issue of parking. The proposed use of 70 Lomita would significantly increase parking demand at a site that already lacks sufficient capacity. The combined Edna/Lomita campus population would grow from about 500 to 1,350 students and staff (a 2.5x increase), yet the plans call for removal of the existing Edna drop-off loop and 43 adjacent parking spaces, with no replacement parking included. This is a serious problem with no clear solution and no remaining physical space to come up with the parking areas necessary to accommodate such a project.

Conclusion
The most rational, safe, and responsible option is renovating the existing middle school with temporary 6th-8th grade housing in portables on site.

Thank you for your attention to this matter and for doing the right thing for our children and our community.

Sincerely,
Meredith Brown
63 Meadow Dr., Mill Valley (Alto-Sutton Neighborhood)

Responses to Meredith Brown Comments

This comment letter expresses various opinions and concerns regarding preferences for the Project and alternatives analyzed in the Draft EIR. The comment's opinions and concerns are noted and are responded to in greater detail in Master Response 1 regarding preferences of Project and alternatives.

This comment letter also expresses various concerns regarding parking and the potential for traffic in relation to the alternatives proposing to temporarily or permanently redevelop a portion of the Edna Maguire/Terra Marin campuses. Traffic issues associated with potential alternatives involving the Edna Maguire/Terra Marin campus are described in the Alternatives chapter of the EIR and addressed in Master Response 3, above.

This comment letter also raises potential pollution and GHG concerns relating to purported increases in traffic. These topics were analyzed within the Draft EIR at pp.3.6-

9 through 3.6-13 and are further discussed with respect to each individual alternative set forth in the Draft EIR in Section 5.5. as revised in this Final EIR (see Staff Initiated Text Changes section).

This comment letter also raises various concerns relating to the potential impacts to archeological and tribal cultural resources associated with the redevelopment of the Edna Maguire/Terra Marin site. Archeological and tribal cultural resources issues associated with the Edna Maguire/Terra Marin site are addressed on pp. 5-12 and 13 of the EIR, which includes a mitigation measure for potential impacts to archaeological resources. With the implementation of this mitigation measure, any potential significant impacts would be reduced to a level of insignificance.

19. Mai Thai Comments

From: Mai Thai <maithaisf@gmail.com>
Date: Wed, Sep 10, 2025 at 6:06 PM
Subject: Support West America TKD & After Care
To: <jarroyo@mvschools.org>

Hello,

I'm writing on behalf of my friends and the families in Mill valley.
Both of my kids have been going to West America TKD for a long time. It's a community of love and support, Chantal and her brother are trying to keep the business that was her Dad's dream for 40 years, he l was someone was kind like the rest of their family. They run this business out of love and passion.

It would be very sad if they had to move or close down because they couldn't afford to rent somewhere else.

They are the heart of the community and we love them.
I hope the city really reconsiders this.

Thank you,
Mai

Responses to Mai Thai Comments

This comment letter expresses concerns regarding the potential displacement of West America Taekwondo Dojo. Please see Master Response 2 for a discussion of this topic.

20. Greg Hanggi Comments

From: **Greg Hanggi** <greg.hanggi@gmail.com>
Date: Wed, Sep 10, 2025 at 1:30 PM
Subject: West America TKD
To: <jarroyo@mvschools.org>

Julio,

I hope this note finds you well. I am emailing in opposition to using the Lomita and Edna facility for the middle school project. Doing so will disrupt the West America Tae Kwon Do school. This business and establishment has been a corner stone of Mill Valley for 42+ years and is a safe place for children to learn, train, and build self esteem/confidence which best prepares them to be positive contributing citizens. Disrupting this long establishments base of operations is not recommended in an effort to keep the ongoing development of our young children. I recommend we leave WATKD to continue their efforts and an alternative plan be developed. Thank you for your attention to the matter.

Thank you,
Greg Hanggi

Responses to Greg Hanggi Comments

This comment letter expresses concerns regarding the potential displacement of West America Taekwondo Dojo. Please see Master Response 2 for a discussion of this topic.

21. Saher Naderi Comments

From: **Sahar Naderi** <snaderi1981@gmail.com>
Date: Wed, Sep 10, 2025 at 1:37 PM
Subject: MVMS Modernization Proposal
To: <jarroyo@mvschools.org>, <ekaufman@mvschools.org>

Dear Mr. Arroyo and Superintendent Kaufman,

My name is Sahar Naderi, and my children, Luke (4) and Sophie (6), attend West America Tae Kwon Do every Thursday. It's where they go to see their friends, practice their splits, learn to focus and be attentive, and absorb the fundamentals of TKD (which they still call karate despite my constant correction).

I understand there is a proposal to potentially displace the Dojo to allow for an expansion project. This is a letter in strong opposition to that option. At a time when play-based learning, community, and human contact are becoming increasingly limited, places like the Dojo need to be elevated and celebrated, not endangered. We also need to support our small business owners, particularly those that have been thriving for over 40 years and who allow for the community to come together in such positive ways. This is an unneeded stress for a family that has long served this community. And if we truly believe that loneliness and social disconnection are a public health crisis, then we need to support the places that actually help counteract all of that.

I also understand this proposed plan would not meet acreage requirements and would not be able to handle projected enrollment increases. It also seems the congestion would be challenging for neighbors, and more importantly, may not allow for safe emergency exit in a disaster. It seems tripling the student body in that space is not reasonable, so if even if the emotional aspects of this letter are not objective enough, this just doesn't seem practical. I completely understand that we can do better in terms of infrastructure for our children and for our community, but more thought needs to be put into alternatives that I am sure exist.

I urge you to more strongly consider the alternative of renovation or finding another parcel of land that does not upend your local families and businesses.

Sincerely,
Sahar Naderi

Responses to Saher Naderi Comments

This comment letter expresses various opinions and concerns regarding preferences for the Project and alternatives analyzed in the Draft EIR. The comment's opinions and concerns are noted and are responded to in greater detail in Master Response 1 regarding preferences of Project and alternatives.

This comment letter also expresses concerns regarding the potential displacement of West America Taekwondo Dojo. Please see Master Response 2 for a discussion of this topic.

This comment letter also raises concerns regarding the adequacy of the Edna Maguire campus with respect to regulatory recommendations. This topic is addressed in Master Response 4, above.

22. Dorsi Bonner Comments

Dear Members of the Mill Valley School Board,

As a lifelong Marin resident and homeowner in the Alto Sutton Manor (Horse Hill) neighborhood, and as a mother of young children, I am writing to express my strong opposition to relocating the middle school to the Lomita site.

I walk my neighborhood with a stroller usually twice a day. Many streets have no sidewalks, and traffic from both Edna Maguire Elementary and the Islamic Center already creates harrowing congestion at certain times. The idea of increasing the student population from roughly 500 to 1,350 is unimaginable. The added car traffic and surge in e-bike use would make our neighborhood unsafe for families who walk and pedestrian traffic.

I am also deeply concerned about safety in the event of an emergency or disaster. The Lomita site and the surrounding community are not adequately equipped to accommodate a safe and timely exit for such a significantly increased student body. Adding hundreds of cars, buses, and e-bikes to an already strained road system would not only put this neighborhood at risk, but would also worsen traffic flow across Mill Valley as a whole. The congestion alone is a serious concern, and any increase on this scale would have citywide consequences, affecting the safety and mobility of the greater Mill Valley community.

As a realtor, I am also concerned about the effect this would have on home values in the area. Increased congestion and reduced pedestrian safety directly impact neighborhood desirability. Walkability scores, which are a measurable and widely used factor in real estate, would inevitably decline under this plan—and with them, property values. Importantly, this would not only affect the walkability score of the Horse Hill neighborhood; decentralizing the middle school would also reduce walkability for families in other neighborhoods that are moved further away from the school. The direct impact on property values could therefore extend well beyond our immediate area, affecting multiple neighborhoods across Mill Valley. This is not only a Horse Hill neighborhood concern but a broader community one, as diminished property values affect tax revenues and the long-term health of Mill Valley as a whole.

Beyond the neighborhood impact, relocation would disrupt the broader Edna Maguire community and displace West America Taekwondo, a beloved, locally owned business that has served families—including my own—for years. This program is an integral part of the community fabric and should not be jeopardized.

The most constructive path forward is to keep the middle school at its current site, where it has always belonged. Renovations can be safely managed with state-regulated protections in place, and temporary student housing can be accommodated with

portables as needed. We have confidence this can be done responsibly, without displacing students and burdening entire neighborhoods.

If you have not heard more dissent from the Horse Hill community, it is only because residents have not been properly informed until recently. We are now becoming aware, we are organizing, and we will ensure our voices are heard. Please understand that we are united in our resolve to keep the middle school at its current site and out of the Lomita area.

Thank you for your time and consideration.

Kindly,

Dorsi Bonner

52 Meadow Drive

Mill Valley

Responses to Dorsi Bonner Comments

This comment letter expresses various opinions and concerns regarding preferences for the Project and alternatives analyzed in the Draft EIR. The comment's opinions and concerns are noted and are responded to in greater detail in Master Response 1 regarding preferences of Project and alternatives.

This comment letter also expresses various concerns regarding parking and the potential for traffic in relation to the alternatives proposing to temporarily or permanently redevelop a portion of the Edna Maguire/Terra Marin campuses. Traffic issues associated with potential alternatives involving the Edna Maguire/Terra Marin campus are described in the Alternatives chapter of the EIR and addressed in Master Response 3, above.

This comment letter also expresses concerns regarding the potential displacement of West America Taekwondo Dojo. Please see Master Response 2 for a discussion of this topic.

23. Max Wertheimer Comments

From: **Max Wertheimer** <max.wertheimer@gmail.com>
Date: Wed, Sep 10, 2025 at 1:53 PM
Subject: Renovate, Don't Relocate – Mill Valley Middle School
To: <jarroyo@mvschools.org>
Cc: <snakatani@mvschools.org>, <nkatz@mvschools.org>, <eabdoli@mvschools.org>, <mcrncichhodge@mvschools.org>, yyoo@mvschools.org <yyoo@mvschools.org>, <letterstotheboardoftrustees@mvschools.org>

Director Arroyo and MVSD Board Members,

As a resident of the Alto-Sutton neighborhood where the relocation is being suggested (I live at 63 Meadow Dr. with my wife and young child), I urge you to ***renovate*** the middle school at its current location – with temporary 6th-8th grade housing in portables on site – and ***not*** relocate to the 70 Lomita location.

Issue #1: More traffic and increased car danger for our small neighborhood where sidewalks are sparse
We have a 1 year old and the thru-traffic on Meadow off of Blithedale is already a concerning issue for our street. We have very few sidewalks and have to navigate very carefully walking with small children and strollers on our street. Adding an entirely new middle school to the same neighborhood on Lomita would only make this issue much, much worse. Currently, those who drive through to bypass traffic on Blithedale or cut through to Edna McGuire, are often driving fast and paying little attention to the kids playing and cars pulling out of driveways. We're scared to think what the traffic situation and increased danger would be like if the middle school was relocated to Lomita.

Issue #2: Current location is central, which makes it easier for kids to walk and bike to school and decreases pollution from additional cars on the road
At a time when pollution from fossil fuels is STILL on the rise, even with our increased knowledge of resulting climate change and climate disasters, we need to be thinking about the future we're leaving for our children. By relocating the middle school to a less central location, there will be more cars on the road, more traffic, more pollution, and increased health related issues (e.g., exposure to air pollution increase childhood instances of childhood asthma) and increased rate of climate change. We're talking about a middle school where we're educating our youth – what kind of example are we setting if we relocate their school to a less central location and thus remove their ability to walk or bike to school?

Issue #3: The Lomita location rests on a known Coast Miwok archaeological site
Also troubling, 70 Lomita sits on a known Coast Miwok archaeological site. Disturbing these sacred grounds for the sake of a relocation that serves no clear educational purpose would be irresponsible and disrespectful to our local history.

Issue #4: Parking concerns for a new middle school located at 70 Lomita
As I walk by Edna regularly during drop-off and pick-up with my baby in my stroller, I see parents and caregivers struggling to find parking. I have seen them parking blocks away on neighboring streets simply to then run to Edna to make it in time. There is clearly already an issue of parking. The proposed use of 70 Lomita would significantly increase parking demand at a site that already lacks sufficient capacity. The combined Edna/Lomita campus population would grow from about 500 to 1,350 students and staff (a 2.5x increase), yet the plans call for removal of the existing Edna drop-off loop and 43 adjacent parking spaces, with no replacement parking included. This is a serious problem with no clear solution and no remaining physical space to come up with the parking areas necessary to accommodate such a project.

Conclusion
The most rational, safe, and responsible option is renovating the existing middle school with temporary 6th-8th grade housing in portables on site.

Thank you for your attention to this matter and for doing the right thing for our children and our community.

Sincerely,
Max Wertheimer
63 Meadow Dr., Mill Valley (Alto-Sutton Neighborhood)

Responses to Max Wertheimer Comments

This comment letter expresses various opinions and concerns regarding preferences for the Project and alternatives analyzed in the Draft EIR. The comment's opinions and concerns are noted and are responded to in greater detail in Master Response 1 regarding preferences of Project and alternatives.

This comment letter also expresses various concerns regarding parking and the potential for traffic in relation to the alternatives proposing to temporarily or permanently redevelop a portion of the Edna Maguire/Terra Marin campuses. Traffic issues associated with potential alternatives involving the Edna Maguire/Terra Marin campus are described in the Alternatives chapter of the EIR and addressed in Master Response 3, above.

This comment letter also raises various concerns relating to the potential impacts to archeological and tribal cultural resources associated with the redevelopment of the

Edna Maguire/Terra Marin site. Archeological and tribal cultural resources issues associated with the Edna Maguire/Terra Marin site are addressed on pp. 5-12 and 13 of the EIR, which includes a mitigation measure for potential impacts to archaeological resources. With the implementation of this mitigation measure, any potential significant impacts would be reduced to a level of insignificance.

24. Christopher Sanchez Comments

From: **Christopher Sanchez** <css7c3@gmail.com>
Date: Wed, Sep 10, 2025 at 2:18 PM
Subject: Petition & public comment
To: jarroyo@mvschools.org <jarroyo@mvschools.org>

Dear members and committee of the Mill Valley School District,

Please reconsider appropriating the Lomita DR locations, as this would negatively impact the West America Tai Kwon Do & Aftercare program.

I recognize the importance of this martial arts academy, and so does the larger community. I respectfully ask that you keep their programs intact, so that America TKD continues to serve the public's interests with the highest standards, which they have demonstrated for years.

Sincerely,
Christopher S. Sanchez
(505) 514-2524

Responses to Christopher Sanchez Comments

This comment letter expresses concerns regarding the potential displacement of West America Taekwondo Dojo. Please see Master Response 2 for a discussion of this topic.

25. Laura Belmont Comments

From: **laura belmont** <hellolaurabelmont@gmail.com>
Date: Wed, Sep 10, 2025 at 2:59 PM
Subject: OBJECTION TO MVMS RELOCATING TO EDNA CAMPUS
To: jarroyo@mvschools.org <jarroyo@mvschools.org>, <letterstotheboardoftrustees@mvschools.org>, ekaufman@mvschools.org <ekaufman@mvschools.org>, snakatani@mvschools.org<snakatani@mvschools.org>, nkatz@mvschools.org <nkatz@mvschools.org>, eabdoli@mvschools.org <eabdoli@mvschools.org>, mcrncichhodge@mvschools.org<mcrncichhodge@mvschools.org>, yyoo@mvschools.org <yyoo@mvschools.org>

To Whom It May Concern,

As a Mill Valley homeowner and taxpayer, I need to express my strong OBJECTION to the plan to use Edna's site for MVMS.

I feel the most responsible, rational and safe option is to renovate the existing middle school with temporary 6th – 8th grade housing in portables on site.

There are many causes for concern and in short, here are just a few reasons this needs to be more thoroughly reviewed:
disruption to edna community
disruption to the surrounding neighborhood that is not equipped to handle an additional 700 kids + staff
major traffic concerns
ebike concerns
safety concerns
parking concerns
risk of construction at Edna is in direct opposition to the Native American Archaeological site
risk of delays
displacement of WA Taekwondo
age group disparity and conflicts of sharing fields and gyms

Please hear the voices of those opposed and reconsider the original solution to stay on site and renovate.

Sincerely,
Laura Belmont

Responses to Laura Belmont Comments

This comment letter expresses various opinions and concerns regarding preferences for the Project and alternatives analyzed in the Draft EIR. The comment's opinions and concerns are noted and are responded to in greater detail in Master Response 1 regarding preferences of Project and alternatives.

This comment letter also expresses various concerns regarding parking and the potential for traffic in relation to the alternatives proposing to temporarily or permanently redevelop a portion of the Edna Maguire/Terra Marin campuses. Traffic issues associated with potential alternatives involving the Edna Maguire/Terra Marin campus are described in the Alternatives chapter of the EIR and addressed in Master Response 3, above.

This comment letter also raises various concerns relating to the potential impacts to archeological and tribal cultural resources associated with the redevelopment of the Edna Maguire/Terra Marin site. Archeological and tribal cultural resources issues associated with the Edna Maguire/Terra Marin site are addressed on pp. 5-12 and 13 of the EIR, which includes a mitigation measure for potential impacts to archaeological resources. With the implementation of this mitigation measure, any potential significant impacts would be reduced to a level of insignificance.

This comment letter also appears to implicate site capacity considerations. While these comments do not appear to implicate any issues for purposes of CEQA that require a response, such comments are generally addressed in Master Response 4.

26. Stephanie Abney Comments

From: **Stephanie Abney** <sabneymccord@gmail.com>
Date: Wed, Sep 10, 2025 at 3:10 PM
Subject: Please Keep West America TKD in Its Home!
To: jarroyo@mvschools.org <jarroyo@mvschools.org>

Dear Mill Valley School District,

I am writing to express a heartfelt appeal on behalf of West America Taekwondo, which has proudly called Lomita Dr. home for the past 42 years. This school is far more than a martial arts studio—it is a community pillar, a second home to generations of students, and a place where values like discipline, respect, and perseverance are taught every day.

To displace West America TKD now would not only disrupt the daily lives of its students and instructors—it would interrupt a legacy. For over four decades, this space has nurtured champions, built confidence in countless young people, and fostered a sense of belonging and purpose.

We urge you to reconsider any decision that would force West America TKD to leave its long-standing home. The community it serves—and the legacy it carries—is irreplaceable.

Sincerely

Stephanie Abney

Thank you for your time and consideration.

Responses to Stephanie Abney Comments

This comment letter expresses concerns regarding the potential displacement of West America Taekwondo Dojo. Please see Master Response 2 for a discussion of this topic.

27. Mary Beth Todd Comments

From: **Mary Beth Todd** <mbnoel@gmail.com>
Date: Wed, Sep 10, 2025 at 3:14 PM
Subject: NO @ 70 Lomita
To: <jarroyo@mvschools.org>, <letterstotheboardoftrustees@mvschools.org>, <ekaufman@mvschools.org>, <snakatani@mvschools.org>, <nkatz@mvschools.org>, <eabdoli@mvschools.org>, <mcrncichhodge@mvschools.org>, <yyoo@mvschools.org>

Dear Members of Mill Valley School Board,

I strongly oppose the proposal to build a new middle school—or temporary housing for middle schoolers—at 70 Lomita. Renovating the existing middle school with temporary portables on site is the safer, smarter, and more community-focused solution.

Safety: The EIR confirms that renovations and portables at the current site are safe, with strict state building regulations ensuring protection during construction.

Space: The current middle school has ~14 acres, compared to only ~4 acres at 70 Lomita. The proposed site is simply too small to meet California's standards for a middle school.

Traffic & Parking: Relocating to 70 Lomita would flood the Alto-Sutton neighborhood with traffic and remove 43 existing parking spaces, creating daily congestion and safety issues. The current campus supports walking and biking, reducing traffic impacts.

Community Disruption: Edna Maguire just completed a major renovation in 2014. Forcing this school to absorb middle schoolers again would unfairly disrupt its students, teachers, and families.

Student Well-Being: Middle schoolers need to stay together in one location to build community and continuity as they prepare for high school. Splitting them across sites would harm their development and academic support.

Renovating the existing middle school—while temporarily housing students on-site—is the only option that truly supports safety, space adequacy, community stability, and student success.

I urge you to reject the 70 Lomita proposal and move forward with renovating the current middle school. It's time to commit to that decision and stop wasting taxpayers time and money.

Sincerely,
Mary Beth Todd

Responses to Mary Beth Todd Comments

This comment letter expresses various opinions and concerns regarding preferences for the Project and alternatives analyzed in the Draft EIR. The comment's opinions and concerns are noted and are responded to in greater detail in Master Response 1 regarding preferences of Project and alternatives.

This comment letter also expresses various concerns regarding parking and the potential for traffic in relation to the alternatives proposing to temporarily or permanently redevelop a portion of the Edna Maguire/Terra Marin campuses. Traffic issues associated with potential alternatives involving the Edna Maguire/Terra Marin campus are described in the Alternatives chapter of the EIR and addressed in Master Response 3, above.

This comment letter also raises various site capacity considerations. While these comments do not appear to implicate any issues for purposes of CEQA that require a response, such comments are generally addressed in Master Response 4.

28. Darrell Gillmeister Comments

From: **Darrell Gillmeister** <darrell.gillmeister@gmail.com>
Date: Wed, Sep 10, 2025 at 5:24 PM
Subject: opposition of using the Lomita (& Edna) campus for the middle school project
To: <jarroyo@mvschools.org>

Julio,

I'm submitting my comment in **opposition to the option of using the Lomita (& Edna) campus for the middle school project.**

The West America TKD dojo, established in 1983, has had an extraordinary impact on the lives of this community including my own family. Moreover, the dojo has also been a long standing district and classroom partner with Kiddo!

In addition, I want to also submit the following clarity of using the Lomita as a campus for the middle school:

- Acreage doesn't meet CA. Dept. of Education guidelines
- Cannot handle projected enrollment increase
- Loss of centralized campus location
- Increased city-wide traffic congestion
- Impacts Edna Maguire community
- Displaces current tenants

With the above facts established, it's quite clear that there are several shortcomings of using this campus. In fact, if you were to use this campus, it's clear that the problem you are trying to solve won't in fact be solved at all and result in a less than ideal solution with negative consequences to the community and environment.

Additional community impacts also include:

- May impact the archaeologically sensitive Native American site at Lomita
- Loss of the Lomita soccer field
- Inadequate to accommodate exit in case of emergency or disaster for an increased student body and the surrounding community
- There are 123isturb 757 students enrolled at MVMS and 428 at Edna as of 2023-2024. Combining campuses would potentially bring the new total to be 1,185, an 176.9% increase, nearly tripling the student body at the Edna/Lomita location.

Finally, in this politically charged climate that we are living under in the current administration where misinformation courses through our daily lives and is impacting our mental health, please be the voice of reason for the community and stand up to

prevent things that are not in the best interest of our citizens with the clarity of facts cited above that detail the consequences.

Be the positive change in the world that this country so desperately needs right now
thank you
darrell

Responses to Darrell Gillmeister Comments

The comment's concerns are noted. This comment letter expresses various opinions and concerns regarding preferences for the Project and alternatives analyzed in the Draft EIR. The comment's opinions and concerns are noted and are responded to in greater detail in Master Response 1 regarding preferences of Project and alternatives.

This comment letter also expresses various concerns regarding parking and the potential for traffic in relation to the alternatives proposing to temporarily or permanently redevelop a portion of the Edna Maguire/Terra Marin campuses. Traffic issues associated with potential alternatives involving the Edna Maguire/Terra Marin campus are described in the Alternatives chapter of the EIR and addressed in Master Response 3, above.

This comment letter also raises various site capacity considerations. While these comments do not appear to implicate any issues for purposes of CEQA that require a response, such comments are generally addressed in Master Response 4.

29. Hilary Hyde Comments

From: **Hilary Hyde** <hfhmvca@gmail.com>
Date: Wed, Sep 10, 2025 at 1:16 PM
Subject: MVMS Plan
To: <ekaufman@mvschools.org>, <snakatani@mvschools.org>, <nkatz@mvschools.org>, <eabdoli@mvschools.org>, <yyoo@mvschools.org>

I live near Edna Maguire. I am NOT in favor of relocating MVMS.
Superintendent Kaufman has expressed concern with sustainability-tearing down MVMS and throwing everything into landfill is not a sustainable practice. Fix the heat/ac system, roof and windows.

MVMS is located at a central/convenient location with 4 lanes of traffic for safety and bike lanes. Lomita Dr is NOT wide enough (barely enough room for 2 cars) and NOT wide enough for a bike lane. In a big emergency, the safety of staff/students would be severely compromised, and the neighbors would also be unable to leave for safer grounds.

Keep MVMS at 425 and fix the building.

Hilary Hyde
54 Meadow MV

Responses to Hilary Hyde Comments

This comment letter expresses various opinions and concerns regarding preferences for the Project and alternatives analyzed in the Draft EIR. The comment's opinions and concerns are noted and are responded to in greater detail in Master Response 1 regarding preferences of Project and alternatives.

This comment letter also expresses various concerns regarding parking and the potential for traffic in relation to the alternatives proposing to temporarily or permanently redevelop a portion of the Edna Maguire/Terra Marin campuses. Traffic issues associated with potential alternatives involving the Edna Maguire/Terra Marin campus are described in the Alternatives chapter of the EIR and addressed in Master Response 3, above.

30. Jim Welte Comments

From: **Jim Welte** <jim@millvalley.org>
Date: Wed, Sep 10, 2025 at 3:37 PM
Subject: Mill Valley Chamber of Commerce Support Letter for West America Tae Kwon Do, a Longtime, Beloved Mill Valley Institution
To: Julio Arroyo <jarroyo@mvschools.org>

https://docs.google.com/document/d/17ztzljyTKk5BwqS1WY089ULLSRa30ytw-9S8DX1__88/edit?usp=sharing

Jim Welte
jim@millvalley.org
Executive Director
Mill Valley Chamber of Commerce

Responses to Jim Welte Comments

This comment letter expresses concerns regarding the potential displacement of West America Taekwondo Dojo. Please see Master Response 2 for a discussion of this topic.

31. Hilary Lazarus Comments

From: **Hillary Lazarus** <hlazarus@gmail.com>
Date: Thu, Sep 11, 2025 at 10:33 AM
Subject: middle school project
To: <jarroyo@mvschools.org>

Hello,
I'm a parent of two children in the Mill Valley school district.

I'm excited about the Middle School modernization project.

As a community member and parent, I feel strongly that the **permanent location of the Middle School should remain in its current location**.

Thank you for all that you do,
Hillary Lazarus

Responses to Hilary Lazarus Comments

This comment letter expresses various opinions and concerns regarding preferences for the Project and alternatives analyzed in the Draft EIR. The comment's opinions and concerns are noted and are responded to in greater detail in Master Response 1 regarding preferences of Project and alternatives.

32. Link Allen Comments

From: **Link Allen** <linkallen1@gmail.com>
Date: Thu, Sep 11, 2025 at 10:48 AM
Subject: Concerned parent about West America TKD
To: <jarroyo@mvschools.org>

My child has been a regular at the West Am Dojo for over four years, and it serves as his primary outlet for all his energy. However, I kindly request that you reconsider your decision to displace them. The move would be a significant financial burden for them, and it would be difficult for them to sustain it. Additionally, the timing of this move, coupled with the recent struggles of I father's passing, seems rather unfortunate. Chantal and Rog are still trying to recover from their past hardships, and they don't need any more added stress. Please take this matter into consideration and reconsider your decision.

LINK ALLEN
Mobile: 415 302 8877

Responses to Link Allen Comments

This comment letter expresses concerns regarding the potential displacement of West America Taekwondo Dojo. Please see Master Response 2 for a discussion of this topic.

33. Lucy Ross Comments

From: **Lucy Ross** <lucy.ross86@gmail.com>
Date: Thu, Sep 11, 2025 at 10:30 AM
Subject: EIR – Comments
To: <jarroyo@mvschools.org>, <LetterstotheBoardofTrustees@mvschools.org>, <ekaufman@mvschools.org>

My name is Lucy Ross, I live in the district and am the parent of a child at Edna Maguire.
I have carefully reviewed the EIR and would like to submit the following comments for consideration:

I strongly support the modernization effort through the renovation of the existing building at Sycamore Avenue. The EIR makes it clear that renovating the current site—while temporarily housing students in on-site portables—is both safe and the most financially responsible option.

By contrast, relocating the Middle School to 70 Lomita Avenue raises serious concerns. For many reasons, it feels unsafe, impractical, and damaging to our community:

- **Community impact:** West America and its founder, Roger, have been a cornerstone of Mill Valley for over 30 years. Their programs—aftercare, Taekwondo, and more—serve countless children and families. Our daughter attends five days a week, and as two working parents, we rely deeply on the safe, supportive environment Roger, Chantal, Lara, and their team provide. Losing this space would be a significant loss for families across the district.
- **Traffic and safety:** A middle school at 70 Lomita, even temporarily, would overwhelm Lomita Drive and the surrounding neighborhoods with traffic. The site is not centrally located, and a surge of middle schoolers biking in the area would create unsafe conditions for younger children walking and biking to Edna and Bright Horizons.
- **Space and future growth:** Moving from a 14-acre campus to a cramped 4-acre campus makes no sense. Renovating the existing site allows us to maximize space, maintain flexibility, and preserve the acreage needed to support future enrollment growth.

Three years ago, the community came together and voted for Measure G with a shared vision. We cannot afford further delays, wasted resources, or disruption driven by a small but vocal minority.

The right decision is clear: keep the middle school together on its existing, appropriately sized, and centralized campus. The future of our students depends on it.

Thank you for your time and thoughtful consideration.

Lucy Ross

Responses to Lucy Ross Comments

This comment letter expresses various opinions and concerns regarding preferences for the Project and alternatives analyzed in the Draft EIR. The comment's opinions and concerns are noted and are responded to in greater detail in Master Response 1 regarding preferences of Project and alternatives.

This comment letter also discusses the potential displacement of West America Taekwondo Dojo. Please see Master Response 2 for a discussion of this topic.

This comment letter also expresses various concerns regarding parking and the potential for traffic in relation to the alternatives proposing to temporarily or permanently redevelop a portion of the Edna Maguire/Terra Marin campuses. Traffic issues associated with potential alternatives involving the Edna Maguire/Terra Marin campus are described in the Alternatives chapter of the EIR and addressed in Master Response 3, above.

This comment letter also raises various site capacity considerations. While these comments do not appear to implicate any issues for purposes of CEQA that require a response, such comments are generally addressed in Master Response 4.

34. Patty Robbins Comments

From: **Patty Robbins** <pattyrobbins@gmail.com>
Date: Thu, Sep 11, 2025 at 10:29 AM
Subject: Comments on MVMS EIR
To: <jarroyo@mvschools.org>, <letterstotheboardoftrustees@mvschools.org>, <ekaufman@mvschools.org>, <snakatani@mvschools.org>, <nkatz@mvschools.org>, <eabdoli@mvschools.org>, Michele Hodge <mcrncichhodge@mvschools.org>, <yyoo@mvschools.org>

Dear Julio, Superintendent Kaufman, and members of the Board,

I attended the Board meeting last night and was able to share my comments on the MVMS EIR via Zoom, but I also wanted to follow up to share these comments in writing. Please do not hesitate to reach out if you have any questions or if it would be helpful to discuss further.

Hello – My name is Patty Robbins and I have 3 kids. I have a 3rd grader and a Kindergartener at Edna, and my youngest is at the Bright Horizon Hillside campus that's adjacent to the Edna campus. In my day job I'm a lawyer at a tech company in San Francisco. I'm speaking today as a parent and a community member.

First, I'd like to acknowledge that the environmental impact report and the overall record here is very clear that renovating the Middle School is quite safe, and that keeping the students on the middle school grounds in portables during the renovation is also a safe and wise choice. These are the best options for the Board.

Second, I'd like to voice my sincere concern about the traffic safety issues that would arise if middle school students were temporarily housed in or adjacent to the Edna campus. The dropoff and pickup traffic is already quite hectic. My preferred route to school is by bike, and I've been excited for my 3rd grader to bike or walk by himself. But with so many additional students arriving on campus and the inevitable increase in cars and e-bikes on the road, I worry that it will no longer be safe for young kids to get to campus by bike or on foot.

Third, I'm concerned about the impact on the Edna community, particularly in a period of declining enrollment. A potential reduction in use of facilities and an influx of traffic and other inconveniences could unfortunately result in more families choosing private school options in lieu of their local community school.

Thank you for considering my comments and for allowing comment by Zoom.

Sincerely,

Patty Robbins
40 Kite Hill Lane
Mill Valley, CA 94941

Responses to Patty Robbins Comments

Please see Master Responses 1 and 3, above.

35. David Speyer Comments

From: **David Speyer** <davidspeyer1@mac.com>
Date: Thu, Sep 11, 2025 at 10:13 AM
Subject: Middle school Project
To: <Jarroyo@mvschools.org>

Hi, I am the parent of a 3rd grader, Levi Donovan at Strawberry Point School. I am writing in support of the rebuild/remodel of the MVMSC at the current site. I feel strongly this is the best option for all students and of course for my son. I hope that the district can get this project moving ASAP as all the delays already have moved the project down the road.
Please rebuild/renovate the Middle School and put the interim housing on the campus.
Best
DAVID SPEYER
14 Eagle Rock Road
Mill Valley CA 94941
davidspeyer1@mac.com
415-971-8683

Responses to David Speyer Comments

Please see Master Response 1, above.

36. Julianna G. Hayes Comments

From: **Julianna G. Hayes** <jgassman@gmail.com>
Date: Thu, Sep 11, 2025 at 10:04 AM
Subject: Comment on Proposed Middle School
To: <jarroyo@mvschools.org>

Hello –
I am a parent of 3 wonderful kids in Mill Valley – 3rd at Edna, 7th at MVMS, and 9th at Tam High. I would like to voice my support for renovating the existing MVMS site at Sycamore and have the students temporarily housed there during construction.
I do not believe that the Lomita site is an acceptable alternative; the neighborhood and roads cannot bear that many more students, and the lost of West America Tae Kwon do is not something to be taken lightly. I also believe that it is safe and common for kids to be in portables while their school is being rebuilt (happening now at Tam!).
We love the middle school, would love for our kids to continue going to that location, and believe it's a safe place for students to be and learn.
Thank you,
Julianna Hayes

Responses to Julianna G. Hayes Comments

Please see Master Responses 1, 2, and 3, above.

37. Patrick Siu Comments

From: **P S** <longfellowmv@gmail.com>
Date: Thu, Sep 11, 2025 at 9:20 AM
Subject: Comment on the Draft EIR
To: <jarroyo@mvschools.org>
Submitted by Patrick Siu.

My name is Patrick Siu. I would like to share my opinion of the possibility of either temporarily or permanently moving the MVMS to the Lomita Campus, and thus, the displacement of West America Tae Kwon Do. This is my version of an environmental report of a different kind. I have two boys. They both grew up in West America. The older one started when he was in first grade, and the younger one followed when he was a kindergartner. They loved every moment in the dojo, practicing martial arts, and making friends that stayed together for a long time. They learn to put in hard work every day, and be respectful to everyone around them. They practiced leadership when they were in the demo team. They earned their belts and both were 3rd degree black belts before they left for college. They are not boys anymore. The older one is 30, working as a mechanical engineer in New York, and the younger one Is 27, a physical therapist working in the Bay Area. They both turn out to be respectful citizens in their communities, largely because of their years maturing in the dojo. If you displace West America, you not only destroy the fond memories of my sons, and many others, you also destroy the environment in which generations of Mill Valley boys and girls can have the same privileges as my sons did. I started tae kwon do in West America when I was 46. I spent 2 hours per day just watching my sons on the sideline during their classes. Sensei Roger Carlon asked me one day to try it for myself. I did and fallen in love with it since. I also earnt my belts and was a 4th degree black belt, certified by Kukkiwon, the international governing body of tae kwon do, to be a martial arts teacher. I taught in West America. I also taught an after-school program in all 5 Mill Valley elementary schools. I provided a safe and fun time for school children before they were picked up by their parents, or returned to aftercare. As all other teachers will testify, teaching is more than just passing the knowledge of a subject. Teaching is modeling life to young and growing minds. I pride myself on being able to do that on a consistent level. If you displace West America, you destroy the opportunities of Chantal Carlon, Roger Carlon Jr. and me, to further that life mission and passion. Lastly, I am 68 years old. I am a cancer survivor. I still train 5 days a week in the dojo. I craft my skill. I do what I can. I learn a new form, firmly believing I can beat the cancer odds, and perform it in the dojo December Christmas party. If you displace West America, you destroy my sanctuary for peace, my environment to recuperate and persevere. Thank you for listening.

Responses to Patrick Siu Comments

Please see Master Response 2, above.

38. Melissa Jenkins Comments

Mill Valley Middle School Modernization Project

Draft Environmental Impact Report (Draft EIR) – Public Comment

Instructions: Please print clearly. Attach additional pages if needed. Comments become part of the public record.

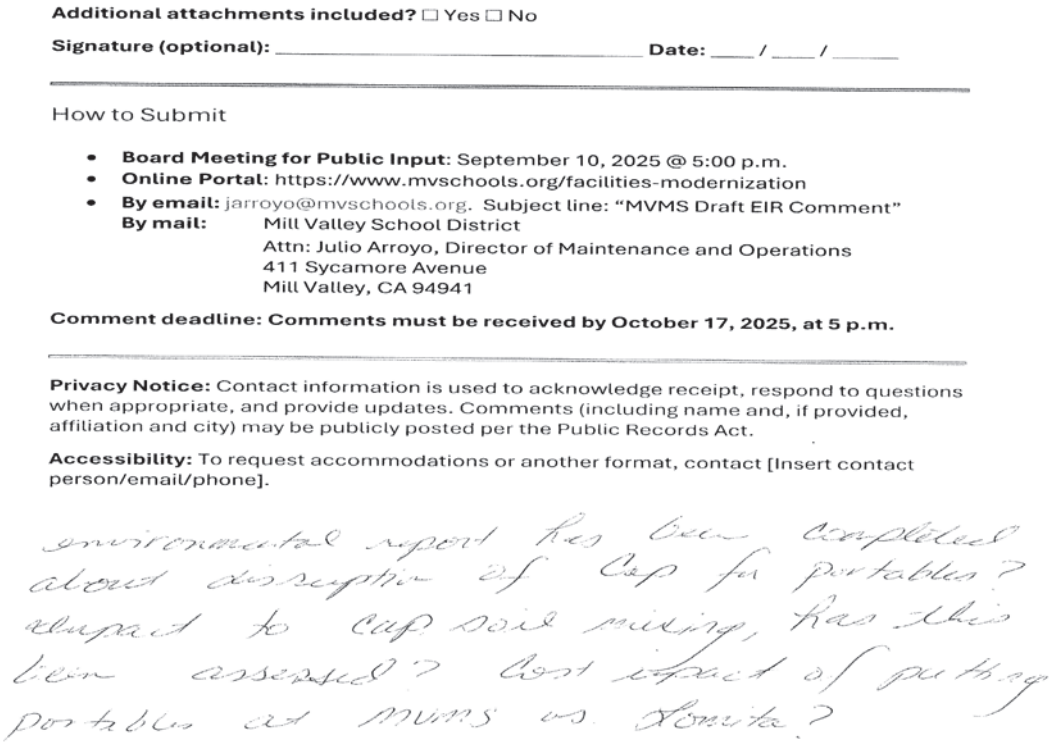
Commenter Information

- **Name:** MELISSA JENKINS
- **Organization/Affiliation (optional):**
- **Mailing Address:** 165 HELENS LN.
  City/State/ZIP: MILL VALLEY, CA 94941
- **Email:** melissa.anrig.jenkins@gmail.com
- **Phone:** (415) 215 - 2225
- **Preferred contact method:** ☑ Email ☐ Phone ☐ Mail
- **I would like to:** ☑ Submit a comment ☑ Receive project updates

Comment(s) on the Draft EIR
(Please reference section/page if possible. Attach additional pages if needed.)

→ For the schedule, children will be moved winter break from the existing MVMS site to the interim site. This will be very disruptive, particularly for 6th graders & their teachers. How has this been assessed. What resources will be available to aid the children.

→ If permanent foundations are needed for portables at MVMS site what →



Additional attachments included? ☐ Yes ☐ No

Signature (optional): _____ **Date:** ____ / ____ / _____

How to Submit

- **Board Meeting for Public Input:** September 10, 2025 @ 5:00 p.m.
- **Online Portal:** https://www.mvschools.org/facilities-modernization
- **By email:** jarroyo@mvschools.org. Subject line: "MVMS Draft EIR Comment"
- **By mail:** Mill Valley School District
  Attn: Julio Arroyo, Director of Maintenance and Operations
  411 Sycamore Avenue
  Mill Valley, CA 94941

Comment deadline: Comments must be received by October 17, 2025, at 5 p.m.

Privacy Notice: Contact information is used to acknowledge receipt, respond to questions when appropriate, and provide updates. Comments (including name and, if provided, affiliation and city) may be publicly posted per the Public Records Act.

Accessibility: To request accommodations or another format, contact [Insert contact person/email/phone].

environmental report has been completed about disruption of cap for portables? Related to cap soil mixing, has this been assessed? Cost impact of putting portables at MVMS vs. Remote?

Responses to Melissa Jenkins Comments

Please see Master Response 1 for a discussion regarding the comments on the project and alternative preferences included within this comment.

This comment also raises a question as to whether permanent foundations are needed for portables at the Project site and whether an environmental report has been completed regarding the disruption of the cap for portables.

The Project would be subject to the mitigation measures set forth in the Mitigation Monitoring and Reporting Plan, including Mitigation Measure 3.7-1, which requires the preparation of a Post Closure Land Use Plan that in part "will also specify foundation design for the Interim Campus." The preparation of a foundation and the potential disruption of the cap by the Interim Campus will therefore be analyzed and adequately addressed in the Post Closure Land Use Plan that will be incorporated into the Project. The preparation of a Post Closure Land Use Plan and the specification of a foundation design for the Interim Campus is further discussed in Mitigation Measure 3.7-2.

39. Sophia Harkins Comments

Dear Mr. Arroyo,

I hope you're well! I'm a Mill Valley Middle School and Tam High graduate and current UC Berkeley student. **I want to encourage MVSD not to use the Edna Maguire campus for the middle school project.** This option has several issues, including displacing current tenants. The project would displace West America Tae Kwon Do studio and aftercare, a **central part of the Edna and Mill Valley community.**

I was a student and coach at West America TKD for over 8 years. Through the mentorship I received at this program, I learned **discipline, respect, and perseverance** that have enabled me to excel academically and professionally in middle school, high school, and now in university. The dojo has been a **core part of the Mill Valley community since 1983** and has made a lasting impact on many students. The studio also provides key after school services for parents at MVSD.

Displacing the studio would be extremely disruptive and harmful to a key local family business that is very important to the Edna and Mill Valley communities. There are also **several issues**with using the site (below):

- Acreage doesn't meet CA. Dept. of Education guidelines
- Cannot handle projected enrollment increase
- Loss of centralized campus location
- Increased city-wide traffic congestion
- Impacts Edna Maguire community
- Displaces current tenants
- May impact the archaeologically sensitive Native American site at Lomita
- Loss of the Lomita soccer field
- Inadequate to accommodate exit in case of emergency or disaster for an increased student body and the surrounding community
- There are 138isturb 757 students enrolled at MVMS and 428 at Edna as of 2023-2024. Combining campuses would potentially bring the new total to be 1,185, an 176.9% increase, nearly tripling the student body at the Edna/Lomita location.

Thank you for your consideration!

Best,
Sophia Harkins

Responses to Sophia Harkins Comments

The comment's concerns are noted. Please see Master Response 1, above regarding preferences of alternatives. Traffic and parking issues associated with potential alternatives involving the Edna Maguire/Terra Marin campus are described in the Alternatives chapter of the EIR and addressed in Master Response 3, above. Archeological and tribal cultural resources issues associated with the Edna Maguire/ Terra Marin site are addressed on pp. 5-12 and 13 of the EIR, which includes a mitigation measure for potential impacts to archaeological resources. That mitigation has been modified based on input from the Tribe.

40. Ruth Lehmann Comments

From: **Ruth Lehmann** <ruth.lehmann@yahoo.com>
Date: Thu, Sep 11, 2025 at 7:33 AM
Subject: Westamerica Taekwondo
To: <jarroyo@mvschools.org>

Dear Mr. Julio Arroyo

I am writing this mail to you from Switzerland with the hope that you might read it.

I used to live in California, and visited the America Taekwondo school for many years, because the Carlon family, Roger sen., Roger jun., and Chantal were, and still are, very close to me.

I have witnessed their dedication, hard work, patience and love for their students for a long time. Their school is an extraordinary place that is an integral part of Mill Valley. To find another location in Mill Valley, with enough parking, etc., would be impossible. For the students and their parents, this wonderful place is like a second home.

Please find a way to get necessary renovations done without shutting down Westamerica Taekwondo.

It has been a very successful place for
42 years that gave meaning and joy to all students who love being members of this unique Mill Valley community.

Please let them continue their inspiring work at the Lomita/Edna campus.
Thanks so much for your time and consideration.

Sincerely,

Ruth Lehmann

Responses to Ruth Lehmann Comments

Please see Master Response 2, above.

41. Judith Harkins Comments

From: **141istur harkins** <judith_harkins@yahoo.com>
Date: Thu, Sep 11, 2025 at 7:16 AM
Subject: Lomita is not the place for new MVMS
To: jarroyo@mvschools.org <jarroyo@mvschools.org>

Hello,
I am writing to inform you that as a Mill Valley parent and resident, I am against moving MVMS to the Lomita location. I am very I with the issues as my kids attended Edna, MVMS and Tam.

Moving to the Lomita campus is an ill-conceived idea that makes no sense for the community of Mill Valley or the school system. That area is not appropriate for another public school. Kids will loose their ability to bike to school. It will further burden the neighborhood with traffic. Additionally, it will destroy Westamerica, which is a decades old community program that has helped hundreds of children, including my own, stay safe after school and grow and prosper.
I encourage the board to continue with the plan of keeping MVMS in its original location.
Best,
Judith Harkins

Responses to Judith Harkins Comments

Please see Master Responses 1, 2, and 3, above.

42. Jane Colwell Comments

From: **jane colwell** <janekcolwell@gmail.com>
Date: Wed, Sep 10, 2025 at 12:18 PM
Subject: Lomita (& Edna) campus for the middle school project
To: <jarroyo@mvschools.org>

Hello Julio.
I am writing in opposition to the potential move of the Middle School to the Edna McGuire campus.
It is my understanding that there are 2 options the board is considering.
1 being portables at the MS while renovations go on
2 moving the MS to the EM campus
Fiscally it makes no sense that option 2 is even on the table. Option 1 is clearly the most financially responsible and causes the least amount of disruption.
If the cost is not enough to consider then how about the congestion of an extra 757 students on 4 acres as opposed to 14 at the current middle school location. With Edna's enrollment that is over 1100 hundred kids in 1/3 the area. Not to mention staff, parking, ingress/ egress for emergency vehicles. None of this would work.
Another point to consider is there's a reason schools separate elementary and middle school kids. The social impact with that many in a small space would be impossible to adequately monitor.
Again with the property size, where would all these portables go? The loss of field, activity space would be detrimental to the well being of all the students.
Honestly I could go on and on with the cons of such a move. The obvious logical solution is to keep the middle school kids at the middle school while renovations go on at that site. There are 14 acres to accommodate this without impacting a whole other neighborhood and elementary site.

Thank you,
Jane Colwell

Responses to Jane Colwell Comments

Please see Master Responses 1 and 3. A conceptual siting plan for portables at the Edna Maguire School/Terra Marin site is shown on Figure 19 on p. 5-9 of the EIR. Issues associated with the alternative site's acreage are addressed in Master Response 4.

43. Adrielle Sorano Comments

From: **Adrielle Serrano** <adrielleserrano@gmail.com>
Date: Wed, Sep 10, 2025 at 11:42 AM
Subject: Opposition to Using Lomita & Edna Campus for Middle School Project
To: <jarroyo@mvschools.org>

Dear Julio Arroyo,

I am writing to oppose the option of using the Lomita (and Edna) campus for the middle school renovation project. Relocating West America TKD & After Care program would displace a program that has been serving families and strengthening this community for over 40 years. Please consider solutions that protect this vital resource while moving forward with the renovation.

For 42 years, this dojo has been much more than just a building. It has been a safe space where children, families, and community members come together to learn, grow, and support one another. **It has built confidence in kids, instilled discipline, and fostered lifelong friendships and community bonds. Displacing this program would mean far more than just moving an activity, it would disrupt a cornerstone of the community that has shaped generations.**

I respectfully urge the district to consider solutions that allow the middle school renovation project to move forward without forcing the closure or relocation of this deeply valued program.

Thank you for your time and consideration.

Sincerely,

Adrielle Serrano, Student and +10 year West America Tae Keon Do Studio Member

Responses to Adrielle Sorano Comments

Please see Master Response 2, above.

44. Amaris Vicari Comments

From: **Amaris** <amarimeyer@gmail.com>
Date: Thu, Sep 11, 2025 at 12:07 PM
Subject: MVMS EIR comment
To: <jarroyo@mvschools.org>

Hi,

I'm sending this as public comment regarding the new potential location of the Mill Valley Middle School. I strongly oppose the school being built on the same site. Keeping a middle school next to a sewage plant and on top of a toxic dump, and on a flood zone area where the kids already have trouble getting to school due to flooding, is the worst option. Building at Edna / Terra Marin, while has its own impact on the community, is much more safe and reliable for the long term. Nothing is higher priority than health and safety of the kids- this trumps traffic and community displacement. There is no site without negative consequences, but building near and on areas that affect the health of our students is a consequence that should not be entertained.
I also wanted to comment that my daughter would get regular headaches on burn days at MVMS inside the main building (not portables), so much so that she would wear a mask. I would hope the EIR addresses air quality in all areas of the school.

Thank you so much for your help collecting the comments!

Amaris Vicari
Parent of 2 current MVMS students

Response to Amaris Vicari Comments

Please see Master Response 1, above. This comment also raises general concerns regarding Air Quality, which is a topic analyzed within the EIR.

45. Zoe Kessler Comments

From: **Zoe Kessler** <glas.zoe@gmail.com>
Date: Wed, Sep 10, 2025 at 11:23 AM
Subject: Writing in support of West American TKD
To: <jarroyo@mvschools.org>

Hello Julio,
I am writing in support of keeping West America TKD in its home. West America has been a fixture of our community for generations. My brother and I studied at the dojo, and my daughter, your office permitting, will study there in a few short years.

West America TKD is not simply a martial arts studio–it is a hub for Mill Valley life. From its beautiful presence at Mill Valley's parades, to hosting summer camps that keep our kids active, to providing vital afterschool care otherwise missing in our district–West America does it all. On top of that, it creates confident, strong, empowered adults in our community, myself included.

While I understand that it's imperative that the middle school be updated and I fully support that effort, doing so at the cost of long-standing family businesses is not ok, and does not reflect Mill Valley's values.

Please revisit this consideration, and help preserve one of the very few family owned businesses we have left for generations to come.

Thank you
Zoe Kessler
243 Flamingo Dr, Mill Valley

Responses to Zoe Kessler Comments

Please see Master Response 2, above.

46. Courtney DiCarlo Comments

From: **Courtney DiCarlo** <csdicarlo@gmail.com>
Date: Wed, Sep 10, 2025 at 11:15 AM
Subject: Letter Supporting Current Location for MVMS Renovation and Temporary Housing
To: <jarroyo@mvschools.org>, <letterstotheboardoftrustees@mvschools.org>, Elizabeth Kaufman <ekaufman@mvschools.org>
Cc: Paul Grana ICE <paul.grana@gmail.com>

Dear MVSD Board of Trustees, Superintendent Kauffman, Mr. Arroyo,

To start, I want to thank you for your continued diligence and attention to all the active issues you're handling within the district. I know it hasn't been easy. We have two children enrolled in the District, attending Edna Maguire Elementary School. One child who soon will be "disrupted" by the middle school construction and the other who stands to benefit greatly from the end result. Like many parents in the community we supported Measure G and we support updating our old facilities which will make the learning environment better for students, and the teaching environment better for teachers.

After three years, these are the things the community has to show for this vote:

- a reduced amount of available funds due to litigation;
- in-fighting in our community with a faceless entity constantly threatening litigation and moving their goal post for compromise (Is it environmental? Is it the portable structures? WHAT IS IT?!);
- A District deeply overwhelmed with damage control instead of education modernization

We are at a critical juncture. If we are expected to break ground in a reasonable time frame:

- ***having portables & materials ordered and delivered for the 2026 school year (~8-9 months);***
- starting work over summer break to keep school time disruption as minimal as possible;
- keeping the Edna Maguire community intact;
- keeping the MVMS community of students and staff intact;
- ***without disturbing the Native American Archaeological Site at 70 Lomita;***
- ***without squeezing the current middle school footprint (~14 acres) into the 70 Lomita site of ~4 acres;***
- AND SO MANY OTHER DATA-DRIVEN REASONS;

THE MOST RATIONAL, SAFE, AND RESPONSIBLE OPTION IS RENOVATING THE EXISTING MIDDLE SCHOOL WITH TEMPORARY 6th-8th GRADE HOUSING IN PORTABLES ON-SITE. (sorry to yell!)

To move forward with any other solution is to put a square peg into a round hole.

The recent EIR data, in combination with the state's highly-regulated building requirements for schools, ensures that appropriate steps are being taken to mitigate any potential hazards during construction. Developmentally, it is best for these different age groups to have their own separate learning and play spaces. The student experience will be negatively affected if we try these piecemeal approaches just to avoid the potential threats of litigation. What more can we test? What more can we mitigate? What more can we do to convince a minority to call off the dogs so we can move forward?

We all want what's best for our children. You have a large group supporting you in this endeavor. PLEASE go the sensible route. Thank you for your perseverance.

Courtney DiCarlo
csdicarlo@gmail.com

Responses to Courtney DiCarlo Comments

The comment's concerns are noted. Please see Master Response 1, above regarding preferences of alternatives. Traffic and parking issues associated with potential alternatives involving the Edna Maguire/Terra Marin campus are described in the Alternatives chapter of the EIR and addressed in Master Response 3, above. Archeological and tribal cultural resources issues associated with the Edna Maguire/ Terra Marin site are addressed on pp. 5-12 and 13 of the EIR, which includes a mitigation measure for potential impacts to archaeological resources. The mitigation has been modified based on input from the Tribe. Issues associated with the alternative site's acreage are addressed in Master Response 4.

47. Kevin Malone Comments

From: **Kevin Malone** <kmalone2009@gmail.com>
Date: Wed, Sep 10, 2025 at 9:34 AM
Subject: new MS location
To: jarroyo@mvschools.org <jarroyo@mvschools.org>

Hello julio, I just wanted to share my opinion during open comment period for new middle school. Although the idea of an ongoing renovation to the current site doesn't sound great for my son (who will be entering MS next year), I do NOT think the Edna location makes sense for a number of reasons, including the fact that the site does not seem appropriate for over 1,000 total combined students. It also seems like a potential nightmare from a traffic standpoint, and we don't even live in that neighborhood.
I prefer the plan to renovate the existing site.
Thank you,
Kevin Malone

Responses to Kevin Malone Comments

Please see Master Responses 1 and 3, above.

48. Javier Ordonez Comments

From: **Javier Ordonez** <sfordonez5@gmail.com>
Date: Thu, Sep 11, 2025 at 12:18 PM
Subject: Public Comment Regarding MVMS: Opposition to Lomita/Edna Option
To: <jarroyo@mvschools.org>

Dear Mr. Arroyo,

My family and I strongly oppose the option of relocating the Middle School to the Lomita/Edna campus. As a parent of three children who attended West America Tae Kwon Do and who currently attend Edna and MVMS, as the husband of an Edna school teacher, a volunteer manager for Mill Valley Soccer Club, and a TUHSD High School teacher myself, I see firsthand how this move would negatively impact our community:

- **Parent perspective:** Displacing long-standing programs like West America TKD would erase an important anchor for families and students, while also eliminating the Lomita soccer fields that serve hundreds of children in our community, including our three children who play competitive soccer. We depend on this afterschool care so that we can serve other children as teachers. West America is lead by caring
- **Teacher perspective:** Tripling enrollment at this site raises major concerns about traffic congestion, emergency evacuation, and the risks of concentrating so many students on an open campus without adequate capacity. My brother's children had to endure the school shooting at Annunciation Church in Minneapolis just last week. As a Kindergarten teacher in Berkeley, on my first year of teaching, we were involved in school shooting, and TUHSD campuses have been closed due multiple times to bomb and gun threats. This is a nightmare for every teacher and emergency scenarios need to be considered during this difficult time.
- **Husband of an Edna teacher:** Consolidating so many students on a campus that does not meet state acreage guidelines would undermine teaching, and learning conditions for both staff and students. The traffic is already difficult around the area and would impact and staff in a negative way.
- **Parent of children who walk/bike to school:** There are no usable sidewalks on many portions of Lomita. Adding hundreds more cars and buses would make it unsafe for my own kids and hundreds of school children who walk or bike to school. This would cause more parents to drive to school, causing more traffic in a positive feedback loop.
- **Volunteer manager for Mill Valley Soccer Club:** Losing the Lomita fields would remove one of the few available spaces for youth sports, further straining field access for the community. Mill Valley Soccer is a gem in our community, all three of our children use Alto field for training. Hundreds of many players, and coaches depend on access to a safe training ground that is accessible to children..

For these reasons, I urge the district to remove the Lomita/Edna campus from consideration and pursue safer, more sustainable alternatives.

Sincerely,

Javier Ordonez

San Andreas High School Science Teacher

Responses to Javier Ordonez Comments

Please see Master Responses 1, 2, and 3, above. The comment's concerns regarding the use of the Lomita fields also are acknowledged.

49. Juliette Lachica Comments

From: **Juliette Lachica** <julietterocks1900@gmail.com>
Date: Wed, Sep 10, 2025 at 10:17 AM
Subject: West America TKD
To: <jarroyo@mvschools.org>

Hi there,

I read that the school district is floating the idea of using the space currently used by West America Tae Kwon Do for renovations. I strongly urge you not to use this building as WATKD has been a strong part of the Mill Valley community for over forty years. My family has been taking their classes for the past 15 years. The owners are incredibly people that give back to their community. They have an after school care program as well as multiple tae kwon do classes offered almost every day of the week. They take part in the yearly memorial parade and have become like family to many.

To see this taken down would sadden thousands of current and past attendees.

Thank you,
Juliet Lachica

Responses to Juliette Lachica Comments

Please see Master Response 2, above.

50. Deepa Ramachandran Comments

From: **Deepa Ramchandran** <dramchan@gmail.com>
Date: Wed, Sep 10, 2025 at 10:06 AM
Subject: Please Protect the West America TKD & After Care Community
To: <jarroyo@mvschools.org>
Dear Mill Valley School District,

I am writing to respectfully request that the district reconsider displacing West America TKD & After Care from its Lomita Dr. location as part of the middle school renovation project.

For 42 years, this dojo has been so much more than a building. It has been a place where children, families, and community members have found discipline, confidence, support, and belonging. My own daughter began training there when she was just 6 years old, and through the guidance and encouragement of Sensei Carlon, Sensei Chantal, Sensei Roger and the dojo community, she earned her first-degree black belt. This achievement represents not only her hard work but also the safe, nurturing, and inspiring environment that West America TKD has created for decades.

Losing this home would mean more than losing a space—it would mean disrupting a legacy of teaching, mentorship, and community that has positively shaped generations of children and families.

I urge the district to seek alternative solutions that allow the middle school renovation to move forward while keeping West America TKD & After Care in its current location. The values taught within these walls—respect, perseverance, and integrity—align deeply with the goals of education, and the Mill Valley community cannot afford to lose such a vital resource.

Thank you for your consideration and for recognizing the importance of protecting programs that have been at the heart of our community for over four decades.

Sincerely,

Deepa Ramchandran

Responses to Deepa Ramachandran Comments

Please see Master Responses 1 and 2, above.

51. Todd Dunphey Comments

From: **Todd Dunphy** <todddunphy60@gmail.com>
Date: Wed, Sep 10, 2025 at 9:44 AM
Subject: West America TKD
To: jarroyo@mvschools.org <jarroyo@mvschools.org>

I have been a student at this school with the West America for 40 years.And please don't move it.The community will loves these programs that are being held there and it would be a travesty if something happened.4 1 5 8 7 5 0 3 6 6.Call me if you need, but please.We want to save our western 153isturb type one though.([Tai Quan Do]

Responses to Todd Dunphey Comments

Please see Master Responses 1 and 2, above.

52. Catherine Tai Comments

From: **Catherine Tai** <catherinetaylortai@gmail.com>
Date: Wed, Sep 10, 2025 at 9:30 AM
Subject: MVSD Project Proposal for Lomita Location
To: <jarroyo@mvschools.org>
Hi Julio,
Thank you for the time and work you are putting into finding the right location for the new Mill Valley Middle School. I realize it is a challenging task for our community and for all those involved in the process.

I am a mom of 3 kids living in the Alto neighborhood. My children attend the West America Tae Kwon Do dojo after school, our kids play on the soccer and baseball fields all year long, and I hike horse hill almost every day. When we moved to Mill Valley 5 years ago, we landed in this neighborhood and I'm immensely grateful that we did. Currently, the community culture is beautifully interwoven between Edna, the dojo and its afterschool programs, kids playing sports afterschool, and families walking dogs and babies. We have lived in many places (VA, NYC, Westchester, Singapore...) and there is something special about the pulse of this neighborhood.

I don't think that a Lomita location would best serve the neighborhood or the Mill Valley Middle School students. Right now, the traffic in the morning to get to Edna is overwhelming. As we all know, parents trying to get to school on time are distracted and often speed. Additionally, the congestion getting in and out of the neighborhood is a lot – more than doubling that number of cars coming into a local neighborhood would cause extreme backups and create safety concerns for neighbors walking their dogs and/or families walking their kids to school (not all areas have sidewalks). And families trying to get to Edna (or a new middle school location) are always competing with commuter traffic trying to get on the highway.

For the middle schoolers, having a more central location (not in the Lomita neighborhood) gives them more independence to walk to the rec center, to starbucks, the juice shop, etc. And, as a parent of a middle schooler, I'd prefer that they were walking to those locations vs. the overpass to strawberry village which is connected to highway traffic/highway speeds. I'd also like to add that I think it's immensely valuable that they are nested between a rec center, a church and the Redwoods community. The middle school years are some of the hardest and having the constant anchor points of positive community connections helps, even if it's in passing.
I know this is a challenging decision to make and I hope my input helps as you help determine the right location for the school.

Thanks so much.

Best,
Catherine

Responses to Catherine Tai Comments

Please see Master Responses 1, 2, and 3, above.

53. Maria Sil Comments

From: **Maria Sil** <martinezot@gmail.com>
Date: Wed, Sep 10, 2025 at 9:22 AM
Subject: Opposition to the option of using the Lomita (& Edna) campus for the middle school project.
To: <jarroyo@mvschools.org>

Hello Mr. Julio Arroyo,
On behalf of myself, my husband, and my son, we are opposed to the use of the Lomita Campus for the Middle School Project. As working parents, we are dependent on the West America Aftercare and Tae Kwon Do programs. This program has made our son thrive in school with new friendships, assisted him in homework, and has provided him a nurturing and inclusive environment. In addition, this Tae Kwon Do program established an atmosphere that gave our son time for focus, stress relief, increased physical strength, and amazing new confidence.

Furthermore, we are also concerned about the impact that this program will have on our neighborhood. We worry that the increased traffic congestion and inadequate space to safely accommodate the high volume of enrollment will have a disastrous effect on our community. Currently, there is already high traffic that makes it difficult to enter and exit Mill Valley in a timely manner. In case of a disaster it will be chaotic and potentially dangerous for the students. Lastly, we are concerned that there is simply not enough acreage to accommodate both a high student census and preserve Lomita as the historical Native American site that has been fundamental to our community.
Please do not displace these after school programs in their current location. As working parents dealing with an already high cost of living, this program gives us a sense of peace that our son is near our home and entrusted with an amazing community team.

Sincerely,
Maria Martinez Sil, Nitin Sil, Siddhartha Sil

Responses to Maria Sil Comments

The comment's concerns are noted. Please see Master Response 1, above regarding preferences of alternatives, and Master response 2, addressing impacts from loss of the dojo. Traffic and parking issues associated with potential alternatives involving the Edna Maguire/Terra Marin campus are described in the Alternatives chapter of the EIR and addressed in Master Response 3, above. Archeological and tribal cultural resources issues associated with the Edna Maguire/Terra Marin site are addressed on pp. 5-12 and 13 of the EIR, which includes a mitigation measure for potential impacts to archaeological resources. The mitigation has been modified based on input from the Tribe.

54. Nancy Sigerman Comments

From: **Nancy Sigerman** <nance24cat@yahoo.com>
Date: Thu, Sep 11, 2025 at 12:29 PM
Subject: Fwd: MVMS Sycamore site suggestions
To: <jarroyo@mvschools.org>

Hi Mr. Arroyo,
Please find below my suggestions for the MVMS Sycamore remodel, if it is selected as the site for a MVMS remodel.
Thank you for your work on this project!
Sincerely,
Nancy Sigerman
Sent from my iPhone

Begin forwarded message:

From: Nancy Sigerman <nance24cat@yahoo.com>
Date: September 9, 2025 at 6:36:01 PM PDT
To: Elizabeth Kaufman <ekaufman@mvschools.org>, Sharon Nakatani <snakatani@mvschools.org>, nkatz@mvschools.org, eabdoli@mvschools.org, mcrncichhodge@mvschools.org, yyoo@mvschools.org
Cc: jon sigerman <jbsige@gmail.com>, Nancy Sigerman <nance24cat@yahoo.com>
Subject: MVMS Sycamore site suggestions

Hi Superintendent Kaufman and MV Board of Trustees,

I have no EIR comments, and trust you to evaluate the best site for MVMS. Below please find my suggestions for MVMS Sycamore site:

1. Aerial view of MVMS-loved the colors selected by Architects on original building plan. Also loved the idea of wood element exterior on the remodel. This pic places vibrant (perhaps cedar stain?) wood in each corner of the School perimeter, not sure if wood placement should be vertical or horizontal. Body of exterior in shade of green selected on original building. Above the green perhaps a narrow strip of blue. (The black exterior with wood is beautiful in the Lionakis office of the future, but is terrible for MVMS. We do not want persons dressed in black hiding in the corners, also encourages bullying where no one can see the mischief.)

2.&3.White eaves-please add white eaves to the entire perimeter of MVMS, see pics 2&3 illustrating huge (too big)and tiny white eaves. The Architects will know the appropriate sizing.

4.Terraced Entry to MVMS-See pic 4, my very rough draft of. 3tier terrace entry to

MVMS (intended to be symmetrical)Instead of grass, plant short native plants selected by the Science Classes for narrow margins of each terrace. The remainder of the tiers would be topped by tiny smooth or crushed pebbles in possibly a sandy color. A couple of benches or picnic tables could be placed near the entrance for use before/after school by students. Parents could bring lawn chairs here for informal meetings, performances etc. (The tall white canopy worked well with the original plan but fails both aesthetically and functionally in the remodel. Lose it. Also lose the silver fencing here, looks like a prison yard. Utilize the current modern simple fencing frame and color it to blend in surroundings.)

5.Tree placement on south and west side of Auditorium-See pic 5-Place about three trees on south side of Auditorium on Sycamore. Place two trees southwest of Auditorium and two trees west of Auditorium. It would be nice to have evergreens here to block occasional fumes, but might be better to go with trees that lose leaves to improve safety so less chance of person or coyote hiding. Just a thought. (The paper squares were not correct size, just stuck squares on my computer screen)

6. Sun/rain canopy-see pic 6 of successful canopy at the elementary school over many tables. This doubles as a lunch spot and outdoor education spot. Potentially located in three spots around the basketball courts. 8th graders could be south of the courts in the corner where you can view the water to the south. 7th grade west of courts and just south of home plate. 6th grade wet of 7th grade. You may have better ideas for locations. These are just suggestions.

7.MVMS entryway safety suggestions—see pic 7 where Reception is located beside front door with direct window & door view of those entering. Receptionist could buzz lock the door if concerned about person approaching building and address them by intercom. Receptionist would control door lock and admit one at a time when appropriate. Occasionally,4-6 doors could be available for one wide opening for entertainment, or to quickly allow a maximum number of students to escape Library fire.

Relocate the mailroom. Move the (380 square foot) Conference Room to Mailroom location. Move the Receptionist desk to the (380 square foot) Conference Room by the front door)

Also consider having 2doors for offices were an escape door might be warranted (could escape into the next office or hallway, for instance): Principal, Receptionist, Nurse, Superintendent etc.

Also consider marking above persons' parking places as Staff Reserved vs. their title so they are less likely to be target by an outsider etc.

8. First floor Library exit sample floorplan-See pic 8 of Library north exit doors. These doors should be setup like entrance to school, where opening can be one door or a

multiple door opening to the north Commons.

Also see pic 5 (excuse my messy post-it) where the post-it marks the Commons Lawn extending to the Lab building and wrapping around it on the sides. Ideally trees would line the west and east margins of the Commons. (Lose the tall white canopy here. Not only will it darken the beautiful Library, it will block Mt Tam. Canopies this tall function poorly for rain and sun. The current large canopy (pic #6) used at the elementary school is the correct height to maximize retreat from rain and sun.

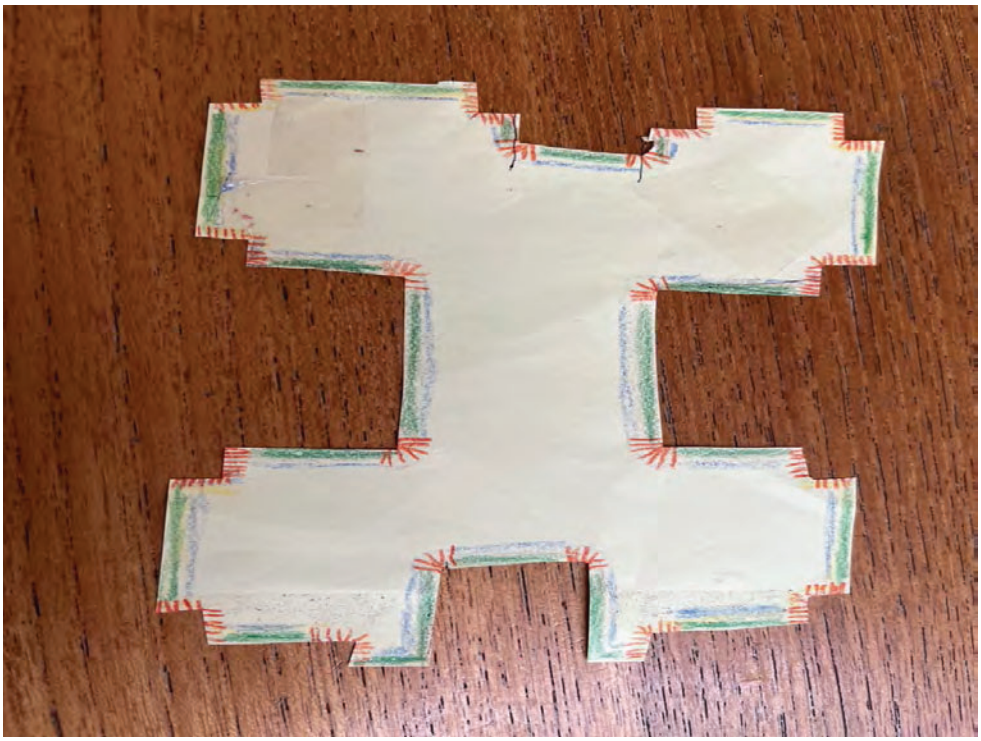
The doors to both Lab rooms should have ability to open wide so they can be used for occasional music and choral performances on the Commons.

There is no need to build benches and chairs on the Commons, a gradual slope is perfect for multiple uses. (Great memories Of Mississippi River Festival at SIUE in the 70's)

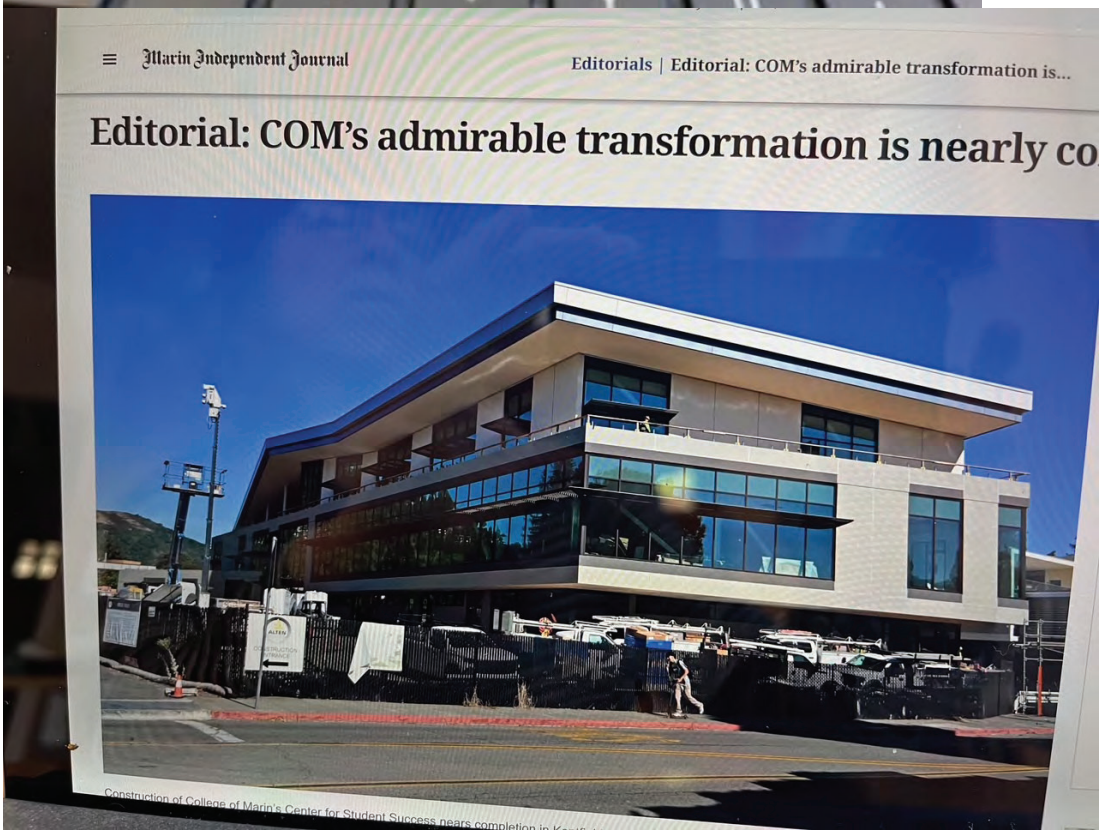
9. Just a pic of a white eaves outlining a mountain ☺.

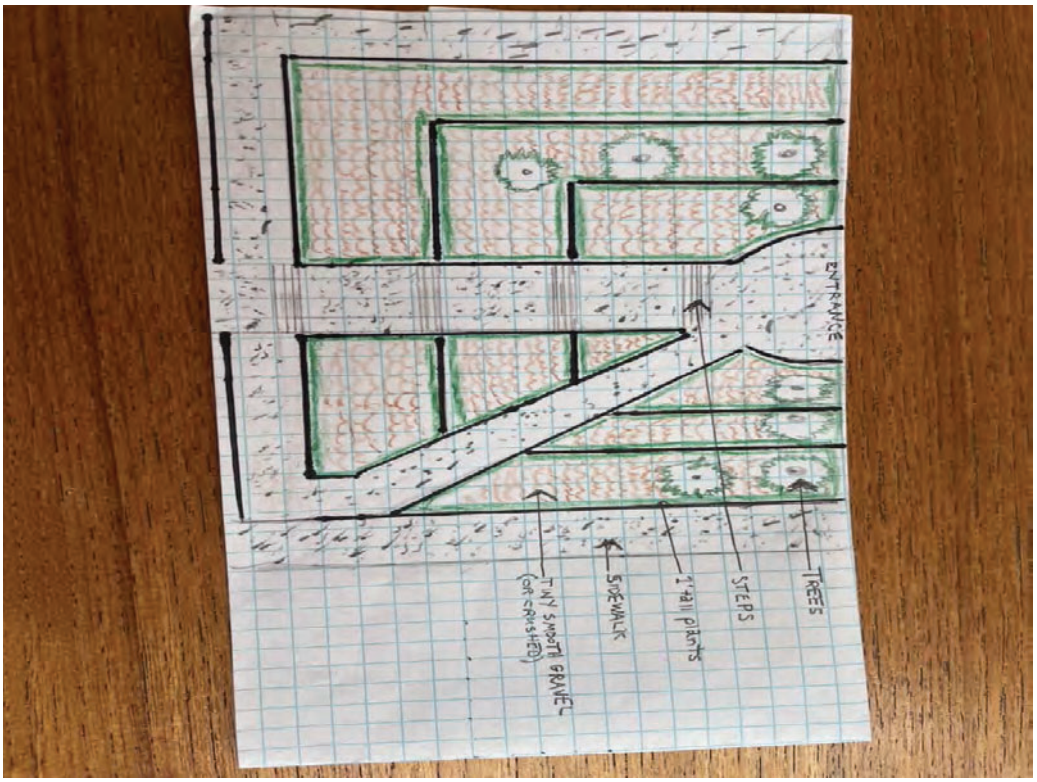
Thank you so much for considering this lengthy email. And Thank You for being such a great Team!!!

Sincerely,
Nancy Sigerman

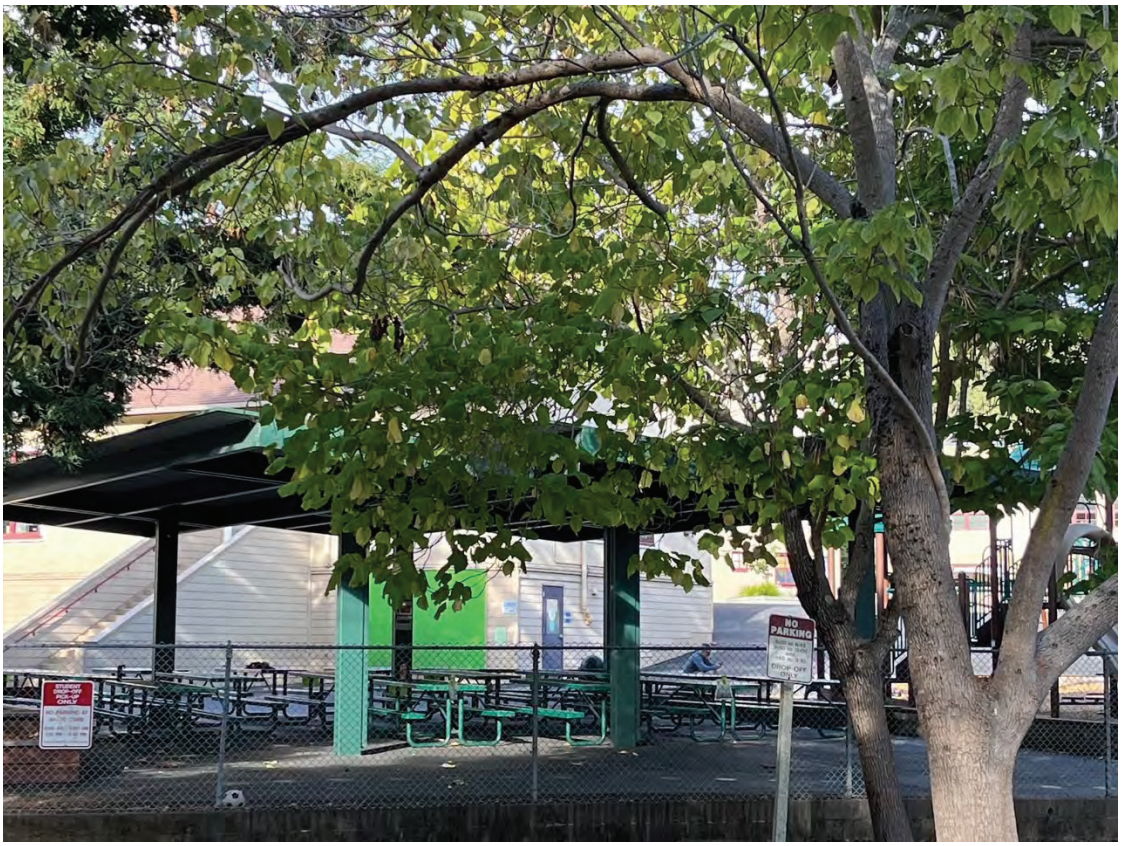


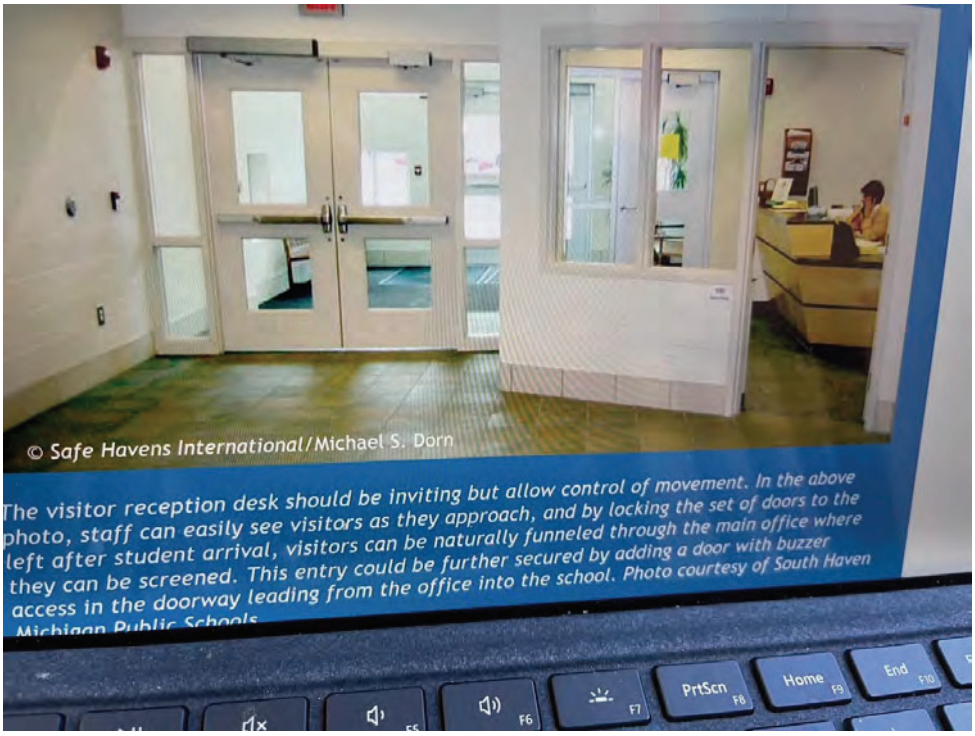

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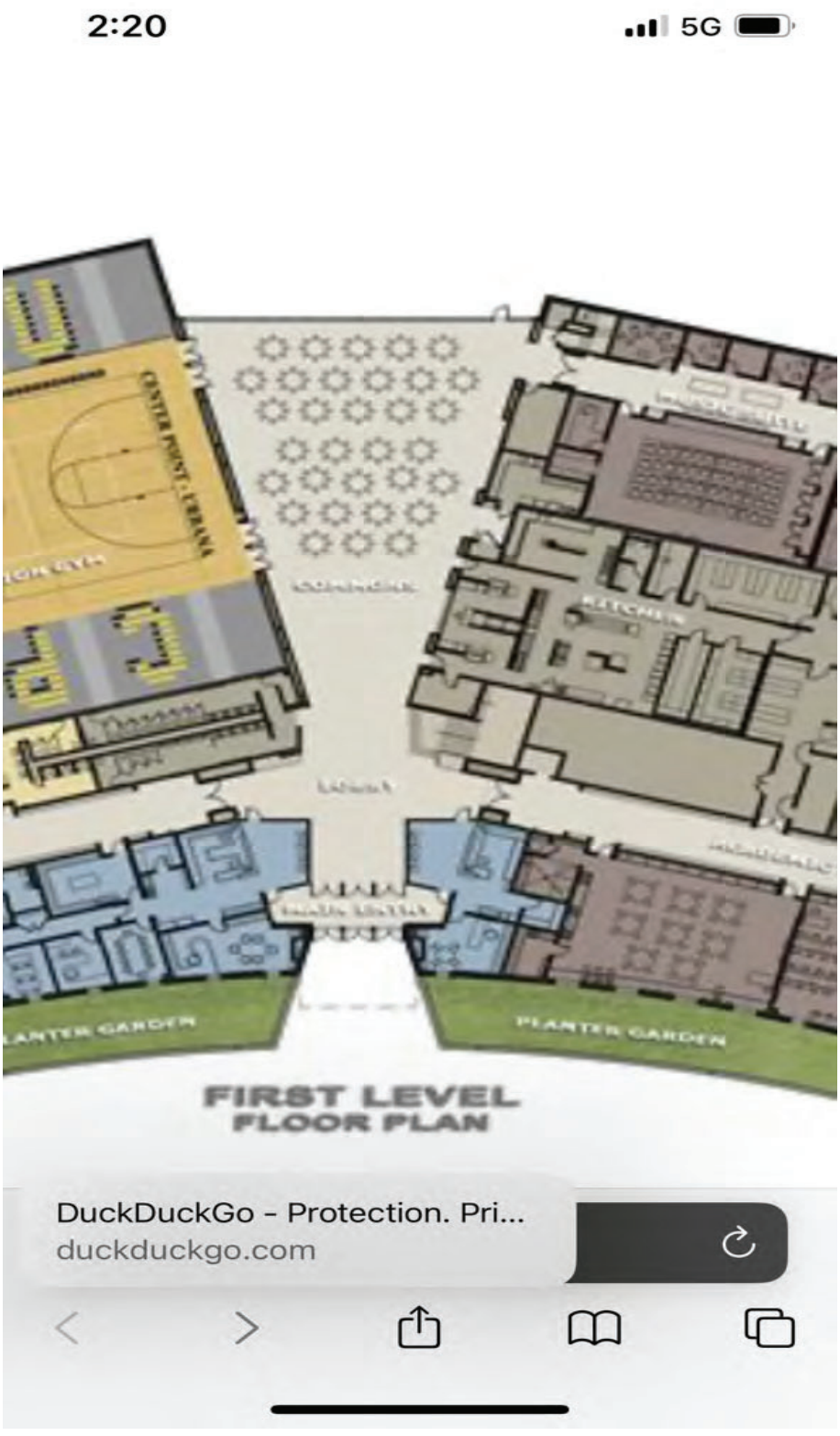

Marin Independent Journal
Editorials | Editorial: COM's admirable transformation is...
Editorial: COM's admirable transformation is nearly co


ENTRANCE
TREES
STEPS
1'-4" PLANTS
SIDEWALK
TINY SMOOTH GRAVEL
(OR CRUSHED)


BLDG C
4,000 SF
1 STORY
NOVATED PLAZA
NEW BAND PATIO
(E) BAND
(E) MAIN CLASSROOM BLDG
EXISTING ENTRY RAMPS
AND STAIRS TO REMAIN
SURROUNDING RAMPS AND
STAIRS TO BE REMOVED
(E) MP BLDG
18 (E) PARKING SPACES
NEW ENTRY
GREENERY


NO PARKING


© Safe Havens International/Michael S. Dorn
The visitor reception desk should be inviting but allow control of movement. In the above photo, staff can easily see visitors as they approach, and by locking the set of doors to the left after student arrival, visitors can be naturally funneled through the main office where they can be screened. This entry could be further secured by adding a door with buzzer access in the doorway leading from the office into the school. Photo courtesy of South Haven Michigan Public Schools
F6
F7
PrtScn
F8
Home
F9
End
F10


2:20
5G
CENTER POINT - URBANA
KITCHEN
PLANTER GARDEN
PLANTER GARDEN
FIRST LEVEL
FLOOR PLAN
DuckDuckGo - Protection. Pri...
duckduckgo.com



Responses to Nancy Sigerman Comments

Please see Master Response 1, above. The suggested design changes will be forwarded to the Project architects and decision-makers for their consideration.

55. Susan Wu Comments

From: **Susan Wu** <mail2susan413@gmail.com>
Date: Wed, Sep 10, 2025 at 9:17 AM
Subject: Please keep west America TKD at where it is now
To: <jarroyo@mvschools.org>

Our kid has been going to WATKD for years, they have taught my kid confidence and respectful of others. It's so close to the school that the kids are able to just walk there. It also offers a much affordable option for the family that can't pay bright horizon and still get an appropriate care + taekwondo. This place is so important and brought so much value to the community. They should stay. I've seen kids that were "out of control" (hitting or not listening) learned their manor in this place. Thousands of good thing about TKD. Please keep them in our mill valley, preferably next to the school.

Thank you.
Susan
Mom to 3 year old and 6 year old

Responses to Susan Wu Comments

Please see Master Response 2, above.

56. Todd Lieman Comments

From: **Todd Lieman** <todd@toddlieman.com>
Date: Wed, Sep 10, 2025 at 8:20 AM
Subject: West America TKD
To: jarroyo@mvschools.org <jarroyo@mvschools.org>

Good morning...

As the Mill Valley School District considers new locations for the Middle School renovation project, I would like to strongly suggest that displacing West America would be a massive mistake. This is a core organization to our community. It has been integral to the health and wellness of thousands upon thousands of kids (and adults) over its 40+ years. The lessons of confidence, discipline, love, ability, etc... are woven into whole lives. This is the kind of decision that could have lasting negative effects on the community in unimaginable ways. Perhaps that feels dramatic. I don't think it is. West America IS a key part of our kids' education.

Be Well,

T

Todd Lieman

Responses to Todd Lieman Comments

Please see Master Response 2, above.

57. Ava Tomnay Comments

From: **Ava Tomnay** <avatomnay272@gmail.com>
Date: Wed, Sep 10, 2025 at 7:50 AM
Subject: Re: West America
To: <jarroyo@mvschools.org>

Hi, was just informed that you are not the problem cause of this, please let the men on the pta who want it gone that this email is for them.
On Wed, Sep 10, 2025 at 7:48 AM Ava Tomnay <avatomnay272@gmail.com> wrote:
Hi Mr. Arroyo, my name is Ava Tomnay i'm 17 and I have been training ant West America Taekwondo for almost 11 years. It's appalling that you seriously think you can use that building for ur dumb school project, ur wrong. That building has history, a family, and an entire community who will support it. It's so sad to see you and the rest of your team be slaves to entitlement and capitalism. If you take that building down, u take down a huge chunk of parents who donate to kiddo and support YOUR fuck ass business. Middle school sucks, no one needs it renovated anyway. If you want to fix it, get rid of that sewer and if you have the chance, you should also probably leave Mr. Arroyo, because it seems like your super ego is is making your have a big head. Stop your projection, I know I very small man inside to even think about doing something like this. Disgraceful, absolutely ignorant and disgusting.

I hope you have the day you deserve, pig.- Ava Tomnay

Response to Ava Tomnay Comments

Please see Master Response 2, above.

58. Tajiha Dubin Comments

From: **Tajjah Dubin** <tajjahblueocean@gmail.com>
Date: Wed, Sep 10, 2025 at 7:47 AM
Subject: KEEP THE DOJO (please)
To: <jarroyo@mvschools.org>

Hi Julio!

Tajjah here from WATKD.

I'm emailing you to request the dojo stays. The community built at 70 Lomita Dr is stronger than any middle school can replace. Please move the middle school some where else. Thank you 🙏

Response to Tajiha Dubin Comments

Please see Master Response 2, above.

59. Sean Dumlao Comments

From: **Sean D** <theleaguema@gmail.com>
Date: Wed, Sep 10, 2025 at 7:25 AM
Subject: Please Keep West America TKD & After Care at Lomita Dr.
To: jarroyo@mvschools.org <jarroyo@mvschools.org>
Cc: Chantal and Roger Carlon <team@westamericatkd.com>

Dear Mr. Arroyo and Mill Valley School District Board,

My name is Sean Dumlao, and I am part of Dumlao's Academy in Pinole, the President of The League Sport Karate Circuit, and have been an associate of the instructors and dojo at West America TKD for many years.

I am writing to express my strong concern regarding the proposal to use the Lomita Dr. location for the middle school renovation project, which would displace West America TKD & After Care from the home it has built with this community for 42 years.

Since its founding in 1983 by Sensei, West America has been more than just a dojo—it has been a cornerstone of Mill Valley. The academy and after-care programs provide mentorship, structure, and a safe environment for children while fostering values of discipline, respect, and resilience. Families across generations have benefited from this unique community hub, and its impact extends far beyond martial arts instruction.

To lose this space would not only disrupt current students and families but also erase a legacy that has enriched Mill Valley for four decades. I respectfully urge the district to pursue a renovation plan that does not come at the expense of such an essential community institution.

Please keep West America TKD & After Care right where it is—continuing to serve families for generations to come.

Thank you for your time and consideration.

Sincerely,

Sean Dumlao
Dumlao's Academy, Pinole

President, The League Sport Karate Circuit

Responses to Sean Dumlao Comments

Please see Master Response 2, above.

60. Krupa Antani Comments

From: **Krupa Antani** <krupapantani@gmail.com>
Date: Wed, Sep 10, 2025 at 7:12 AM
Subject: West America TKD
To: <jarroyo@mvschools.org>

Hello,

I wanted to send a letter of support to keep West America TKD in its existing location. My daughter attends summer camp here and is enrolled in a full year Martial Arts Program. This is not just a place to learn Tae Kwon Do, it is a community space that has enriched the lives of children and their families for decades. The program builds confidence, grit and pride in the young people that attend. It would be a huge disservice to no longer have this school on MV Schools property.

Thank you for your consideration.

All my best,
Krupa Antani

Responses to Krupa Antani Comments

Please see Master Response 2, above.

61. Caiden Barteau Comments

From: **Caiden Barteau** <cibarteau@gmail.com>
Date: Wed, Sep 10, 2025 at 7:02 AM
Subject: West America Tae Kwon Do
To: jarroyo@mvschools.org <jarroyo@mvschools.org>

Hi there, I hope you're doing well.

It has recently come to my attention that the school district is considering using this space as part of the school renovation project. West America Tae Kwon Do is like a second home to me. It has been a place I trained at for over 8 years and built long lasting connections. I have trained there with Sensei learned off of him and the rest of the instructors and now continue to learn from Teacher Roger and Chantal! They have worked hard to create this space and it is an area full of memory's of what Sensei dedicated his life to building. This dojo has been there for 42 years and is a dojo built off the senseis love and hopes to teach others his passion. It has since then became a place of community and the legacy of sensei! I believe that this dojo is a home to many and would bring devastation to many if anything were to happen.

Thank you for giving me a moment of your time and I hope you realize how much this dojo and its location means to me and so many others within its community.

Thank you

Response to Caiden Barteau Comments

Please see Master Response 2, above.

62. Phillip Peng Comments

From: **Philip Pang** <ppang519@gmail.com>
Date: Wed, Sep 10, 2025 at 12:11 AM
Subject: Please Keep West America TKD in Our Community
To: jarroyo@mvschools.org <jarroyo@mvschools.org>

Dear Mill Valley School District,

I'm writing to ask that you please keep West America TKD & After Care at their Lomita Dr. location.

This dojo has been part of Mill Valley for over 40 years. It's not just a building — it's a place where kids learn discipline, confidence, and respect. For many families, it's also a safe and supportive after-school space.

Displacing West America TKD would mean losing a cornerstone of our community. I hope the district can find a way to move forward with renovations without forcing out a program that has given so much to Mill Valley for decades.

Thank you for listening.

Responses to Phillip Peng Comments

Please see Master Response 2, above.

63. Arjun Gupta Comments

From: **Arjun Gupta** <aguptus@yahoo.com>
Date: Thu, Sep 11, 2025 at 12:59 PM
Subject: My opposition to the MVSD Middle School Renovation Project
To: jarroyo@mvschools.org <jarroyo@mvschools.org>

Dear Mr. Arroyo,

I am writing to express my opposition to the MVSD Middle School Renovation Project. At just over 400 students, the Edna Maguire Community cannot bear a near 200% increase through the combination of campuses and would adversely change the character of the neighborhood so it would be virtually unrecognizable. The current campus, along with the broader community that includes West America Tae Kwon Do Dojo and After-care facility, would be destroyed. For what? To make way for the increase in enrollment, to bring greater traffic congestion, and to displace tenants like the Dojo which, along with the school, is a pillar of the community and has been there for over four decades. In short, the changes proposed by the MVSD Middle School Renovation Project would be a terrible blow to families all over Southern Marin County.

As the co-founder of a business in Mill Valley and a parent, I am firmly in opposition to the MVSD Middle School Renovation Project.

Thank you for your consideration.

Best regards,

Arjun Gupta
415.342.5324
Worthound

Responses to Arjun Gupta Comments

Please see Master Responses 1 and 2, above. Please also see Master Response 3 for a discussion of potential traffic impacts.

64. Jana Stryker Comments

From: **Jana Strycker** <jana@grifiti.com>
Date: Tue, Sep 9, 2025 at 7:04 PM
Subject: MVMS Renovation
To: <jarroyo@mvschools.org>

I am writing to strongly oppose the plan of moving MVMS next to Edna McGuire. As Edna is already overcrowded and parents park on Azalea to drop off their kids at school, I have witnessed, almost daily, children nearly missing get hit by passing cars as they exit /cross the street. I cant' imagine a more dangerous and unsafe idea than putting more children at risk in an already congested area that does not have proper drop off safety points surrounding the entire area.

We strongly encourage the Mill Valley School Board of Trustees to choose the current location at 425 Sycamore Avenue because this is the safest choice when compared to any other choice.

The alternative choice next to Edna Maguire on Lomita is extremely problematic.
~~**Traffic and parking**: This is already terrible at Edna. The current student population at MVMS is approximately 756 students, and the current student population at Edna is approximately 428 students. This would result in almost 1200 students and far more teachers and staff driving and parking in an already terribly congested area. This would gravely exasperate the already severe current traffic and parking problems on single lane streets as opposed to the current location with two lane streets going each direction. Parents are already causing problems at Edna by parking in driveways and blocking traffic. It would also greatly worsen the traffic on East Blithedale and the peripheral neighborhoods which is already bad.
~~**Safety:** Edna parents are already parking on Azalea and Underhill. Many of these parents are not safety conscious and are oblivious to passing traffic. We have witnessed several near miss accidents in these areas. Traffic, parking and safety would be dangerously problematic for night time school events at a Lomita campus.
~~**Size:** The Lomita location would be too small an area to properly and adequately fit in the MVMS.
~~**Cost:** We feel that the cost for this location would be more expensive than the current location. Much of the current MVMS campus can be salvaged and repurposed which would result in cost savings.

Sincerely,
Jana & Phil Wessells
13 Middle Court
Mill Valley, CA

Responses to Jana Stryker Comments

Please see Responses to Comments 1 and 3, above with respect to site preferences and traffic. Issues associated with the alternative site's acreage are addressed in Master Response 4.

65. Michael Goodwin Comments

From: **Michael Goodwin** <michaelgdwn@gmail.com>
Date: Tue, Sep 9, 2025 at 7:02 PM
Subject: Strong Support for Moving Forward with the MVMS Renovation Project
To: <jarroyo@mvschools.org>, <letterstotheboardoftrustees@mvschools.org>, <snakatani@mvschools.org>, <nkatz@mvschools.org>, <eabdoli@mvschools.org>, <mcrncichhodge@mvschools.org>, <yyoo@mvschools.org>
Cc: Basma Al-Yahya <Basma.alyahya@gmail.com>

Dear Mr. Arroyo and Members of the MVSD Board of Trustees,

I am writing to express my strong and unequivocal support for the plan to renovate the existing Mill Valley Middle School at the Sycamore Avenue campus, with temporary student housing in portables on-site. This project is essential for the future of our children's education and the well-being of our community.

It has become deeply concerning to watch this vital project be repeatedly delayed. These hold-ups, often driven by the threat of litigation from a small minority, appear to serve narrow self-interests rather than the collective good of our community and, most importantly, our students. Each delay represents a significant waste of taxpayer dollars from Measure G funds and, more critically, **postpones providing our children with the safe, modern educational facility they deserve**.

The recently released Draft Environmental Impact Report (EIR) clearly confirms that renovating the current campus with on-site temporary housing is a safe and viable option. This plan is the most rational and responsible path forward. It keeps the student body together, utilizes a campus with adequate space, and avoids the significant traffic, parking, and community disruption issues that would be created by attempting to build at the 70 Lomita site.

We elected you to make sound decisions for our schools and our children. I urge you to stand firm against the pressures that seek to derail this project. Please move forward decisively with the renovation of the existing middle school. **Let's stop wasting time and resources and start building the future for our students.**

Thank you for your time and your service to our community.

Sincerely,
Michael Goodwin and Basma Al-Yahya
Homestead Valley Residents and Parents of two MVSD Children

Responses to Michael Goodwin Comments

Please see Master Responses 1 and 3, above.

66. Bob and Regina Canepa Comments

To Whom It May Concern,
We strongly encourage the Mill Valley School Board of Trustees to choose the current location at 425 Sycamore Avenue because this is the logical choice when compared to any other choice.

The alternative choice next to Edna Maguire on Lomita is extremely problematic.
~~**Traffic and parking**: This is already terrible at Edna. The current student population at MVMS is approximately 756 students, and the current student population at Edna is approximately 428 students. This would result in almost 1200 students and far more teachers and staff driving and parking in an already terribly congested area. This would gravely exasperate the already severe current traffic and parking problems on single lane streets as opposed to the current location with two lane streets going each direction. Parents are already causing problems at Edna by parking in driveways and blocking traffic. It would also greatly worsen the traffic on East Blithedale and the peripheral neighborhoods which is already bad.
~~**Safety:** Edna parents are already parking on Azalea and Underhill. Many of these parents are not safety conscious and are oblivious to passing traffic. We have witnessed several near miss accidents in these areas. Traffic, parking and safety would be dangerously problematic for night time school events at a Lomita campus.
~~**Size:** The Lomita location would be too small an area to properly and adequately fit in the MVMS.
~~**Cost:** We feel that the cost for this location would be more expensive than the current location. Much of the current MVMS campus can be salvaged and repurposed which would result in cost savings.

Sincerely,
Bob & Regina Canepa

Responses to Bob and Regina Canepa Comments

Please see Responses to Comments 1 and 3, above with respect to site preferences and traffic. Issues associated with the alternative site's acreage are addressed in Master Response 4.

67. Courtney Gaiman Comments

From: **Courtney Gaiman** <courtneygaiman@gmail.com>
Date: Tue, Sep 9, 2025 at 4:34 PM
Subject: Middle School Modernization: EIR Comments
To: jarroyo@mvschools.org <jarroyo@mvschools.org>, <letterstotheboardoftrustees@mvschools.org>, Elizabeth Kaufman <ekaufman@mvschools.org>

Dear Julio, Superintendent Kaufman, and MVSD Board Members,

Thank you all for your extraordinary efforts to get us to this point in the Mill Valley Modernization project.

I have reviewed the EIR report and would like to officially submit the following comments:

I strongly support the modernization of Mill Valley Middle School by renovating the existing building at Sycamore Avenue and utilizing portables to house all middle school students (6th – 8th grade) on site at the existing campus during construction.

I urge you to vote on renovating the existing campus and discard the possibility of building a new middle school or temporary housing at 70 Lomita for the following reasons:

- I am confident that the EIR demonstrates that students and staff will be **safe** both during renovation construction and following completion of the project. Further, I am confident that all middle-schoolers 6th through 8th grade will be safe to remain in portables on-site at Sycamore Avenue during the renovation process. I trust that the highly-regulated rules that govern school construction in our state will be followed and that all required mitigation techniques and strategies will be closely followed.

- I feel that renovating the existing middle school is the best use of our Measure G funds and is the most **fiscally-responsible** choice between our remaining options.

- Constructing a new middle school or building temporary housing for any portion of middle school students at 70 Lomita would cause considerable upheaval and **significant disruption for Edna** students, teachers and staff. This school community deserves to continue to thrive and flourish without being negatively impacted by middle school modernization.

- Building a new middle school at 70 Lomita OR building temporary student housing at this site would cause Lomita Drive and the surrounding neighborhoods to be flooded with excessive traffic. This would place a **significant traffic burden** on the Alto-Sutton neighborhood and surrounding community. I feel that the proposed staggered drop-off/pick-up times would only prolong the duration of the day that this small neighborhood community is inundated with heavy traffic. Additionally, I feel that the proposed bus service would be a terrible $750k yearly waste of district funds.

- There is **not sufficient parking** available for faculty/staff or special events for a new middle school OR temporary housing at 70 Lomita. This location already suffers from lack of parking as it is. Let's avoid a constant parking disaster by keeping the middle school and all temporary housing at Sycamore Avenue.

- In terms of acreage: the math is not math-ing! I believe it is a terrible idea to try to fit a middle school population and facility that currently sits on a 14 acre campus into a building envelope that is approximately 4 acres. Renovating the existing site allows us to leverage the **largest acreage available.** Let's not build a new middle school on a site with insufficient acreage where middle-schoolers will feel cramped. Let's renovate so that we retain space for future increases in enrollment.

- We cannot risk digging nearby Edna Maguire and building a new middle school or foundations for portables and potentially uncover additional **historically or culturally significant artifacts or remains**. I don't believe it is responsible to initiate such a project at 70 Lomita while knowing that there is a chance of disrupting or interfering with remains that are sacred to our indigenous neighbors. Let's be good stewards of the land and respectful to those who came before us.

- It would be such a **shame to disrupt and displace West America Taekwondo and their beloved Aftercare Program**. My two sons both attend this special place that has served as a community strong-hold since 1983. There is already a dearth of aftercare options in our area, and many district families rely on West America for after school care, especially given its nextdoor proximity to Edna. Please renovate the existing middle school and do not destroy the future of this community gem.

- Please make a decision that allows middle-schoolers 6th through 8th grade to remain together, building community and connection, on one campus. Let's keep **middle-schoolers together** (along with the teachers, counselors, and staff that support them!) Additionally, let's keep middle-schoolers separate from elementary kids. I feel strongly that all of MVSD students will have the best developmental outcomes if all middle school students remain on-site at Sycamore Ave during middle school renovations.

Thank you so very much for your time. Wishing you all the very best – especially during these next couple of months.

Kindly,

Courtney Gaiman
Edna Parent

Responses to Courtney Gaiman Comments

The comment's concerns are noted. Please see Master Response 1, above regarding preferences of alternatives, and Master Response 2, addressing impacts from the potential loss of the dojo. Traffic and parking issues associated with potential alternatives involving the Edna Maguire/Terra Marin campus are described in the Alternatives chapter of the EIR and addressed in Master Response 3, above. Archeological and tribal cultural resources issues associated with the Edna Maguire/Terra Marin site are addressed on pp. 5-12 and 13 of the EIR, which includes a mitigation measure for potential impacts to archaeological resources. Issues associated with the alternative site's acreage are addressed in Master Response 4.

68. Julia Gottleib Comments

From: Julia Gottlieb <juliascahill@gmail.com>
Date: Thu, Sep 11, 2025 at 2:36 PM
Subject: Public Comment on Draft EIR – Support for Rebuilding at Edna/Terra Marin
To: <jarroyo@mvschools.org>

Dear Mr. Arroyo,

I am writing to firmly register my support for the option to rebuild MVMS at the Edna site.

Renovating the current site feels like kicking the can down the road. The problems there are already numerous, and with climate change and increasing flood risks, they will only continue to compound.

Rebuilding at Edna is the only responsible and sustainable solution. It prioritizes the well-being of our students now and into the future, and ensures that we do not continue to expose them to unsafe and unhealthy conditions.

I urge the district to move forward with the Edna site option.

Sincerely,
Julia Gottlieb

Responses to Julia Gottleib Comments

Please see Master Response 1.

69. Greg Etemad Comments

From: Greg Etemad <getemad@gmail.com>
Date: Fri, Sep 12, 2025 at 1:31 AM
Subject: Please Keep West America TKD in Its Home
To: <jarroyo@mvschools.org>

Dear Mill Valley School District Board,

I strongly urge you not to displace West America TKD & After Care from its Lomita Dr. location. For 42 years, this dojo has been more than a building—it's been a safe, supportive community where children and families learn discipline, confidence, and respect.

Losing this space would disrupt a legacy that has shaped generations. Please find a solution that allows the middle school renovation to move forward without forcing West America from the home it has built with this community.

The school district has listed some cons about using Lomita (our location) as a campus for the middle school:
- Acreage doesn't meet CA. Dept. of Education guidelines
- Cannot handle projected enrollment increase
- Loss of centralized campus location
- Increased city-wide traffic congestion
- Impacts Edna Maguire community
- Displaces current tenants

In addition, I want to highlight further consequences on the community:
- May impact the archaeologically sensitive Native American site at Lomita
- Loss of the Lomita soccer field
- Inadequate to accommodate exit in case of emergency or disaster for an increased student body and the surrounding community
- There are 182isturb 757 students enrolled at MVMS and 428 at Edna as of 2023-2024. Combining campuses would potentially bring the new total to be 1,185, an 176.9% increase, nearly tripling the student body at the Edna/Lomita location.

Roger Carlon established this dojo in 1983. He was a pillar to this community and had a profound impact on many lives. Our dojo has been a long standing district and classroom partner with Kiddo! We believe deeply in this community and in continuing the vision that Sensei Roger Carlon built.
My son has trained at West America for over 7 years and in addition to learning a lot about taekwondo, he has also learned a lot of important life
lessons

Thank you for your consideration.
Sincerely, Greg

Gregory K Etemad

Responses to Greg Etemad Comments

The comment's concerns are noted. Please see Master Response 1, above regarding preferences of alternatives, and Master response 2, addressing impacts from loss of the dojo. Traffic and parking issues associated with potential alternatives involving the Edna Maguire/Terra Marin campus are described in the Alternatives chapter of the EIR and addressed in Master Response 3, above. Archeological and tribal cultural resources issues associated with the Edna Maguire/Terra Marin site are addressed on pp. 5-12 and 13 of the EIR, which includes a mitigation measure for potential impacts to archaeological resources. Issues associated with the alternative site's acreage are addressed in Master Response 4.

70. Francesca Malek Comments

Hi Julio Arroyo(or Mr. Arroyo if that's what you prefer.),

My name is Francesca Malek, I grew up and went to school in Mill Valley my whole childhood, I actually only just moved this fall to San Francisco to transfer to SFSU as I just finished with my AA at College of Marin in the Spring. My younger sister and I went to Strawberry Point Elementary, Mill Valley Middle School, and Tamalpais High School from 2009 to 2022(her 2022, me till 2021, but then I went to College of Marin so I was still living in Mill Valley with my family), when my family and I moved to Mill Valley in 2009 from San Francisco my dad decided to look for a martial arts studio for my sister and I to start at(him being a black belt in Kenpo Karate himself already), and he found West America Tae Kwon Do, he spoke with both Patrick Siu and World Champion and owner of the studio Roger Carlon Senior(now his son Roger Carlon Junior is one of the owners of the studio so just clarifying as to not confuse you). And my dad signed my sister and I up, we were hesitant at first but with a little convincing we agreed to start training there, my sister and I very quickly fell in love with West America Tae Kwon Do studio and the family we had created there, my sister and I proudly(and not easily!!) got our black belts in December of 2014. But in early 2016 I myself found out I had a brain tumor and had to get Brain Surgery, both Patrick Siu and Roger(better known as Sensei) visited me all the way in Oakland while I was in the hospital, I kept my black belt tied next to my hospital bed to help inspire me to get better as quickly as I could. I was in the hospital for 8 weeks and when I was finally allowed to go home my insurance only provided me with a few weeks of out of hospital physical and occupational therapy, even though I needed more than that. My dad mentioned this to Sensei and he told my dad to just bring me to see him and that he would make sure I did whatever I needed. So my dad did, and I was able to see Sensei every Saturday and it started with focusing on my therapy but turned into training again, and Sensei even with my destroyed memory from my surgery was the most patient man to work with me to try and teach me all the new forms to work towards getting my second degree black belt. Even when I started at College of Marin there was a class I took and I had to write an essay to teach someone something of my choosing, so I chose Tae Kwon Do, I had to interview Sensei and write a whole speech and everything, and he helped me with all of it. When Sensei passed away in 2022, it was one of the most heartbreaking losses of my life, I don't go a day without thinking about and missing him. Sensei opened his studio in 1983, 42 years ago, what started with him and has now been passed down to his 2 also world champion children(Chantal and Roger) and the community he built his studio lives on past him, training the next world champions and teaching the next

generation, respect, kindness, community, and how to protect themselves and others. I BEG of you Julio Arroyo to not dismantle or halt or infringe upon what a legacy West America has built here for the Mill Valley and Marin County community, please find another option for MVMS' rebuild as this is not the right one.

Thank you,

Francesca Malek

Responses to Francesca Malek Comments

Please see Master Response 2, above.

71. Cortney Oldt Comments

From: **Cortney Oldt** <cortney@oldt.com>
Date: Thu, Sep 11, 2025 at 10:15 PM
Subject: MVMS School Location
To: <jarroyo@mvschools.org>

I'm a parent who has a 9th grader and a 4th grader. My 9th grader started at Edna in TK so I have had kids in the district for 10 years. I have lived in the Sycamore Park and Horse Hill neighborhoods for a total of 15 years.

I'd like to comment on the middle school location being on Lomita Avenue. The first thing that comes to my mind is the traffic. The roads heading to Edna cannot handle Edna traffic and middle school traffic. That location can't handle the traffic for a school as large as the middle school and Edna traffic. The idea of having to evacuate the schools for an emergency needs to be checked against any regulations about access. It would be a nightmare.

Edna Maguire is currently a nice atmosphere of grade school kids, families that live nearby, kids that walk to school, and a treasured program and afterschool care at West America that has been part of the community for so many years. If West America had to move location from Terra Marin (or close) it would be a big loss for the parents who depend on their kids being able to walk there from Edna and be picked up locally. My daughter uses West America aftercare occasionally and it's a great place. I could see how passionate West America and the kids who go there are at the School Board meeting. It is truly a rare treasure to still have a small privately owned family business providing such care and instruction to our kids.

The direct neighbors of Edna did not buy their houses with any expectation that a middle school would be built there. The people living in Horse Hill did not sign up for cars and electric bikes cutting through their small streets to get to and from school.

The current middle school is on a location with a stoplight and main arteries. It is easily accessible for kids from all parts of Mill Valley to reach. Using Lomita as a location would increase traffic all over MV because of the increase in kids needing rides or bussing if their school was no longer accessible by foot or bike.

The middle school has been determined to be a safe site for a school and for renovation to a school. I believe the best decision for the community is to renovate the middle school on site with portables on site.

Cortney Oldt, resident and mom of Mara and Ezra Oldt

Responses to Cortney Oldt Comments

Please see Master Responses 1, 2, and 3, above.

72. Diana Guo Comments

From: **Diana Guo** <dianaguo@outlook.com>
Date: Thu, Sep 11, 2025 at 8:49 PM
Subject: Please Keep West America TKD in Its Home
To: jarroyo@mvschools.org <jarroyo@mvschools.org>

Dear Mill Valley School District Board,

I strongly urge you not to displace West America TKD & After Care from its Lomita Dr. location. For 42 years, this dojo has been more than a building—it's been a safe, supportive community where children and families learn discipline, confidence, and respect.

I have two Edna students who currently attend their after care program 5 days a week and take TKD lessons. My daughter has enjoyed their summer programs too. They are a vital part of our community.

Losing this space would disrupt a legacy that has shaped generations. Please find a solution that allows the middle school renovation to move forward without forcing West America from the home it has built with this community.

Thank you for your consideration.

Sincerely,
Diana

Responses to Diana Guo Comments

Please see Master Response 2, above.

73. Mary Toth Comments

From: **Marty Toth** <mvtoth@gmail.com>
Date: Thu, Sep 11, 2025 at 8:35 PM
Subject: Please Keep West America TKD and After Care in its Home
To: <jarroyo@mvschools.org>
Cc: Liz Davis <lizmariedavis@gmail.com>

Dear Mill Valley School District Board,

I strongly urge you not to displace West America TKD & After Care from its Lomita Dr. location. Our family has relied on both TKD and After Care for years and would be devastated and highly disrupted if it were to move. This dojo has been more than a building—it's been a safe, supportive community where children and families learn discipline, confidence, and respect.

Losing this space would disrupt a legacy that has shaped generations. Please find a solution that allows the middle school renovation to move forward without forcing West America from the home it has built with this community.

Please find another way.

Regards,

Marty Toth

Responses to Mary Toth Comments

Please see Master Response 2, above.

74. Fia Modrich Comments

From: **Fia Modrich** <fiamdln13@icloud.com>
Date: Thu, Sep 11, 2025 at 7:12 PM
Subject: Comments Against Displacing West American Taekwondo
To: <jarroyo@mvschools.org>

Dear Mill Valley School District Board,

I strongly urge you not to displace West America TKD & After Care from its Lomita Dr. location. For 42 years, this dojo has been more than a building—it's been a safe, supportive community where children and families learn discipline, confidence, and respect.

Losing this space would disrupt a legacy that has shaped generations. Please find a solution that allows the middle school renovation to move forward without forcing West America from the home it has built with this community.

Thank you for your consideration.
Sincerely, Fia Modrich

Responses to Fia Modrich Comments

Please see Master Response 2, above.

75. April Green Comments

From: **April Green** <aprilgreen49@gmail.com>
Date: Thu, Sep 11, 2025 at 5:18 PM
Subject: Middle school location
To: <jarroyo@mvschools.org>

Please keep the MVMS on it's current campus with renovations. As a resident of Greenfield Ct. Our street and neighborhood can't take more cars and kids than it already has!
April Green
6 Greenfield Ct

Responses to April Green Comments

Please see Master Responses 1 and 3, above

76. Sita Ryan Comments

From: **Sita Ryan** <sitaryan1@gmail.com>
Date: Thu, Sep 11, 2025 at 4:18 PM
Subject: Draft EIR Public Comment
To: <jarroyo@mvschools.org>

Hello.

I am writing to express my strong support for the MVMS project to go forward with a renovation at its current location on Sycamore Drive.

I DO NOT agree with building a new school on the 70 Lomita property. It's too small. Too much traffic. Not enough parking. Too many students and faculty in one place at a time. My backyard is the current soccer field at 70 Lomita. I do not want the construction and building to happen in my backyard. It makes no sense to put the school there. I trust that it is safe and healthy to renovate the Sycamore building.

Thank you,

Sita Ryan
2 Greenfield Ct.
Mill Valley, CA. 94941
415-810-5120

Responses to Sita Ryan Comments

Please see Master Responses 1 and 3, above.

77. Meenal Balar Comments

From: **Meenal Balar** <meenal.balar@gmail.com>
Date: Thu, Sep 11, 2025 at 3:49 PM
Subject: Please keep West America TKD!
To: <jarroyo@mvschools.org>

Dear Mill Valley School District Board,

I strongly urge you not to displace West America TKD & After Care from its Lomita Dr. location. For 42 years, this dojo has been more than a building—it's been a safe, supportive community where children and families learn discipline, confidence, and respect.

Losing this space would disrupt a legacy that has shaped generations. Please find a solution that allows the middle school renovation to move forward without forcing West America from the home it has built with this community.

Thank you for your consideration.
Sincerely,
Meenal

Responses to Meenal Balar Comments

Please see Master Response 2, above.

78. Eliza and Kevin Lochner Comments

From: **Eliza Lochner** <elizalochner@gmail.com>
Date: Thu, Sep 11, 2025 at 3:44 PM
Subject: Renovate MVMS + Build the Temporary Campus on Sycamore Ave
To: <jarroyo@mvschools.org>

Julio and MVSD Board Members,

We are homeowners in Homestead Valley. We have a 6th grader at MVMS and a 5th grader at Edna. This means both of our kids will be in Middle School during the construction if it were to go through. We are satisfied with the safety report and are strongly in favor of the renovation of the existing campus and temporary classrooms on that campus.

It is not safe, practical, or financially wise to do ANYTHING at the Edna campus. One point from the school board meeting that really struck me was the depreciation of home values in that area should there be an increase in traffic. We rely on parcel tax for our school budgets. We need to ensure home values are not negatively impacted by this decision.

Another excellent point, reinforcing that the rational choice is to renovate and temporarily house at Sycamore, was that choosing the Edna campus would dislocate a beloved, 42 year institution–West America Tae Kwon Do. My son has trained there for 5 years and my daughter attended aftercare there for 5 years. Both have also done summer camps. It is really an extension of our family. Losing that business would be like losing the heart of Mill Valley.

The last point that made it so clear to me that the Edna campus is not a viable option at all is safety. It is not safe to cram that many people into that campus. Emergency evacuation times, the increase of parked cars on the road, plus the number of whizzing e-bikes, buses, horses, and 1100 five through fourteen year olds, staff and parents? NOPE. It defies logic.

Do the safe thing. The sane thing. The best thing. For our community. Our kids. And our future. Renovate the middle school and locate temporary housing at Sycamore Ave.

Thanks for all you do,
Eliza & Kevin Lochner

Responses to Eliza and Kevin Lochner Comments

Please see Master Responses 1, 2, and 3, above.

79. Natalie Schaffer Comments

From: **Natalie Schaffer** <natkat615@gmail.com>
Date: Thu, Sep 11, 2025 at 3:42 PM
Subject: Please Keep West America TKD in Its Home
To: <jarroyo@mvschools.org>

Dear Mill Valley School District Board,

I strongly urge you not to displace West America TKD & After Care from its Lomita Dr. location. For 42 years, this dojo has been more than a building—it's been a safe, supportive community where children and families learn discipline, confidence, and respect.

Losing this space would disrupt a legacy that has shaped generations. Please find a solution that allows the middle school renovation to move forward without forcing West America from the home it has built with this community.

Thank you for your consideration.
Sincerely,
Natalie Schaffer

Responses to Natalie Schaffer Comments

Please see Master Response 2, above.

80. Lauren Gebert Comments

From: **Lauren Gebert** <laurenbvance@gmail.com>
Date: Thu, Sep 11, 2025 at 2:35 PM
Subject: Opposition to building MVMS on Lomita campus
To: <jarroyo@mvschools.org>

Dear Mill Valley School District Board,

I am writing to express my opposition to building the MVMS campus on Lomita next to Edna Maguire.

Constructing at the Lomita address would displace West America Aftercare & Tae Kwon Do. As two full time working parents, our daughter (now a 4th grader at Edna Maguire) has attended West America Aftercare for the last three years. It is an affordable, on campus childcare option that does not require one of us to drive her. She has also participated in TKD classes for the last three years, a program that fosters respect and confidence in our youth in a positive, fun environment.

Traffic and parking are also serious concerns. During morning drop off, there's a lack of parking as is for the number of elementary students & family. The neighborhood is simply not built to sustain an additional 750+ students (+ staff) coming in & out of the narrow streets on a daily basis.

MVMS should remain in its current location, which is central to the five elementary school schools that feed into it and offers multiple access routers to distribute traffic more safely and efficiently.

Thank you for your consideration.
Sincerely,
Lauren Gebert

Responses to Lauren Gebert Comments

Please see Master Responses 1, 2, and 3, above.

81. Justin Dolly Comments

From: **Justin Dolly** <dollyjus@gmail.com>
Date: Thu, Sep 11, 2025 at 2:51 PM
Subject: Please Keep West America TKD in Its Home
To: <jarroyo@mvschools.org>

Dear Mill Valley School District Board,

I strongly urge you not to displace West America TKD & After Care from its Lomita Dr. location. For 42 years, this dojo has been more than a building—it's been a safe, supportive community where children and families learn discipline, confidence, and respect.

Losing this space would disrupt a legacy that has shaped generations. Please find a solution that allows the middle school renovation to move forward without forcing West America from the home it has built with this community.

Thank you for your consideration.
Sincerely,
Justin Dolly

Responses to Justin Dolly Comments

Please see Master Response 2, above.

82. Jaki Chaparro Comments

From: **jaki chaparro** <jakichaparro@gmail.com>
Date: Thu, Sep 11, 2025 at 2:45 PM
Subject: Please Keep West America TKD in Its Home
To: <jarroyo@mvschools.org>

Dear Mill Valley School District Board,

I strongly urge you not to displace West America TKD & After Care from its Lomita Dr. location. For 42 years, this dojo has been more than a building—it's been a safe, supportive community where children and families learn discipline, confidence, and respect.

Losing this space would disrupt a legacy that has shaped generations. Please find a solution that allows the middle school renovation to move forward without forcing West America from the home it has built with this community.

Thank you for your consideration.
Sincerely,

Jaki Chaparro

Responses to Jaki Chaparro Comments

Please see Master Responses 1 and 2, above.

83. Matt Barkovich Comments

From: Matt Barkovich <matt@barkovich.com>
Date: Tue, Sep 16, 2025 at 9:01 AM
Subject: Public Comment on Mill Valley Middle School Modernization Draft EIR
To: <jarroyo@mvschools.org>

Hi Julio,
I am a Mill Valley School District parent (with two children likely to be impacted by this) commenting on the Mill Valley Middle School Modernization Draft EIR. I support renovating the existing middle school building rather than building new facilities at 70 Lomita.

I attended the existing MVMS when I was a child and think the outstanding accessibility (by bike, foot, or car) of the current location cannot be matched at any other site, particularly at 70 Lomita. In addition, the odor from the sewage plant is not particularly bothersome and is rarely stronger than the naturally occurring odor from the bay mud.

Key Concerns with 70 Lomita:

Traffic & Parking: Building at 70 Lomita would flood Lomita Drive with excessive traffic, burdening surrounding neighborhoods. The site lacks sufficient parking for the population increase from 500 to 1,350 students/staff, especially with plans to remove 43 existing parking spaces.

Site Inadequacy: At only 4 acres, 70 Lomita cannot adequately house a middle school compared to the current 14-acre site. Elementary and middle schoolers would be forced to share play spaces and gyms, which is developmentally inappropriate.

Community Disruption: Edna Maguire was just renovated in 2014 and shouldn't face another major disruption. The beloved taekwondo studio and aftercare program would be displaced, removing an important community resource families rely on.

Educational Impact: Middle schoolers should remain together in one location to build community before high school, not be split between sites.

Benefits of Renovation:

- The EIR confirms renovation with on-site portables is safe
- New HVAC systems can address any odor concerns
- Maintains central location supporting walking/biking to school (as I, and many of my classmates, did)
- Leverages the most appropriate site size per state guidelines

Please include these comments in the Draft EIR under my name.

Thank you,
Matt Barkovich

Responses to Matt Barkovich Comments

Please see Master Responses 1- 4, above.

84. Karie Brown Comments

From: <klbklb@mac.com>
Date: Tue, Sep 16, 2025 at 6:27 AM
Subject: Public Comment MVMS modernization draft EIR
To: <jarroyo@mvschools.org>

Dear Julio,

I am a Mill Valley School District parent commenting on the Mill Valley Middle School Modernization Draft EIR. I support renovating the existing middle school building rather than building new facilities at 70 Lomita.

Please consider the environmental and cultural impacts when making this decision. Below are just a few of the concerns that I hope you will take into consideration.

Key Concerns with 70 Lomita:

Traffic & Parking: Building at 70 Lomita would flood Lomita Drive with excessive traffic, burdening surrounding neighborhoods. The site lacks sufficient parking for the population increase from 500 to 1,350 students/staff, especially with plans to remove 43 existing parking spaces.

Site Inadequacy: At only 4 acres, 70 Lomita cannot adequately house a middle school compared to the current 14-acre site. Elementary and middle schoolers would be forced to share play spaces and gyms, which is developmentally inappropriate.

Community Disruption: Edna Maguire was just renovated in 2014 and shouldn't face another major disruption. The beloved taekwondo studio and aftercare program would be displaced, removing an important community resource families rely on.

Educational Impact: Middle schoolers should remain together in one location to build community before high school, not be split between sites.

Benefits of Renovation:

- The EIR confirms renovation with on-site portables is safe
- New HVAC systems can address any odor concerns
- Maintains central location supporting walking/biking to school
- Leverages the most appropriate site size per state guidelines

Please include these comments in the Draft EIR under my name.

Thank you,
Karie Brown

Responses to Karie Brown Comments

Please see Master Responses 1-4, above.

85. Diane Goldman Comments

From: **Diane Goldman** <dianegoldman@icloud.com>
Date: Mon, Sep 15, 2025 at 10:56 PM
Subject: Public Comment on Mill Valley Middle School Modernization Draft EIR
To: <jarroyo@mvschools.org>

Hi Julio,

I live in the Mill Valley School Distriict commenting on the Mill Valley Middle School Modernization Draft EIR. I support renovating the existing middle school building rather than building new facilities at 70 Lomita.
Key Concerns with 70 Lomita:

Traffic & Parking: Building at 70 Lomita would flood Lomita Drive with excessive traffic, burdening surrounding neighborhoods. The site lacks sufficient parking for the population increase from 500 to 1,350 students/staff, especially with plans to remove 43 existing parking spaces.

Site Inadequacy: At only 4 acres, 70 Lomita cannot adequately house a middle school compared to the current 14-acre site. Elementary and middle schoolers would be forced to share play spaces and gyms, which is developmentally inappropriate.

Community Disruption: Edna Maguire was just renovated in 2014 and shouldn't face another major disruption. The beloved taekwondo studio and aftercare program would be displaced, removing an important community resource families rely on.

Educational Impact: Middle schoolers should remain together in one location to build community before high school, not be split between sites.

Benefits of Renovation:
1. The EIR confirms renovation with on-site portables is safe
2. New HVAC systems can address any odor concerns
3. Maintains central location supporting walking/biking to school
4. Leverages the most appropriate site size per state guidelines

Please include these comments in the Draft EIR under my name.

Thank you,
Diane Goldman

Responses to Diane Goldman Comments

Please see Master Responses 1-4, above.

86. Jenna Freil Comments

From: Jenna Powers <jenna.powers@gmail.com>
Date: Mon, Sep 15, 2025 at 9:55 PM
Subject: Public Comment on Mill Valley Middle School Modernization Draft EIR
To: <jarroyo@mvschools.org>

Hi Julio,

I am a Mill Valley School District parent commenting on the Mill Valley Middle School Modernization Draft EIR. I support renovating the existing middle school building rather than building new facilities at 70 Lomita.

Key Concerns with 70 Lomita:

Traffic & Parking: Building at 70 Lomita would flood Lomita Drive with excessive traffic, burdening surrounding neighborhoods. The site lacks sufficient parking for the population increase from 500 to 1,350 students/staff, especially with plans to remove 43 existing parking spaces.

Site Inadequacy: At only 4 acres, 70 Lomita cannot adequately house a middle school compared to the current 14-acre site. Elementary and middle schoolers would be forced to share play spaces and gyms, which is developmentally inappropriate.

Community Disruption: Edna Maguire was just renovated in 2014 and shouldn't face another major disruption. The beloved taekwondo studio and aftercare program would be displaced, removing an important community resource families rely on.

Educational Impact: Middle schoolers should remain together in one location to build community before high school, not be split between sites.

Benefits of Renovation:
1. The EIR confirms renovation with on-site portables is safe
2. New HVAC systems can address any odor concerns
3. Maintains central location supporting walking/biking to school
4. Leverages the most appropriate site size per state guidelines

Please include these comments in the Draft EIR under my name.

Thank you,
Jenna Friel

Responses to Jenna Freil Comments

Please see Master Responses 1-4, above.

87. Stephanie Ryder Comments

From: **Stephanie Ryder** <stephryder1@gmail.com>
Date: Mon, Sep 15, 2025 at 9:00 PM
Subject: Public Comment on Mill Valley Middle School Modernization Draft EIR
To: <jarroyo@mvschools.org>

Dear Julio,

I am a former Mill Valley School District/Edna Maguire/MVMS parent commenting on the Mill Valley Middle School Modernization Draft EIR. I support renovating the existing middle school building rather than building new facilities at 70 Lomita.

Key Concerns with 70 Lomita:

Traffic & Parking: Building at 70 Lomita would flood Lomita Drive with excessive traffic, burdening surrounding neighborhoods. The site lacks sufficient parking for the population increase from 500 to 1,350 students/staff, especially with plans to remove 43 existing parking spaces.

Site Inadequacy: At only 4 acres, 70 Lomita cannot adequately house a middle school compared to the current 14-acre site. Elementary and middle schoolers would be forced to share play spaces and gyms, which is developmentally inappropriate.

Community Disruption: Edna Maguire was just renovated in 2014 and shouldn't face another major disruption. The beloved taekwondo studio and aftercare program would be displaced, removing an important community resource families rely on.

Educational Impact: Middle schoolers should remain together in one location to build community before high school, not be split between sites.

Benefits of Renovation:
1. The EIR confirms renovation with on-site portables is safe
2. New HVAC systems can address any odor concerns
3. Maintains central location supporting walking/biking to school
4. Leverages the most appropriate site size per state guidelines

Please include these comments in the Draft EIR under my name.

Thank you,
Stephanie Ryder

Responses to Stephanie Ryder Comments

Please see Master Responses 1-4, above.

88. Jayli Miller Comments

From: **Jayli Miller** <jaylimiller@gmail.com>
Date: Mon, Sep 15, 2025 at 7:40 PM
Subject: MVMS at Edna
To: <jarroyo@mvschools.org>

Hello,
I'm a parent whose child attends west 209isturb aftercare and taekwondo lessons. I am concerned about the plans to build the middle school at that location and the disruption that would cause to the facilities.

I am also concerned more generally with the board's continued delays in making a decision on what to do about the middle school. I know that the decision is probably much more complicated than I could ever imagine. I am an arbitrator and have to make challenging decisions every week and know that it is extremely stressful. One piece of advice that a judge once gave me years ago is: they don't need you to be right, they just need you to make a decision.

I feel the school board needs to make a decision as the issue of where to build the school has been lingering for a long time. I think the best decision is to renovate the existing school and not impact Edna and surrounding businesses/homes. However, whatever decision the board makes, someone will be unhappy. That dilemma cannot be solved by delay.

Regards,
Jayli Miller

Responses to Jayli Miller Comments

Please see Master Responses 1 and 2.

89. Catherine Moreno Comments

From: **Catherine Moreno** <cathmoreno8@gmail.com>
Date: Mon, Sep 15, 2025 at 5:37 PM
Subject: Please do NOT move the MVMS campus to 70 Lomita (even temporarily)
To: <jarroyo@mvschools.org>, <letterstotheboardoftrustees@mvschools.org>, <ekaufman@mvschools.org>, eabdoli@mvschools.org <eabdoli@mvschools.org>, nkatz@mvschools.org<nkatz@mvschools.org>, snakatani@mvschools.org <snakatani@mvschools.org>, yyoo@mvschools.org <yyoo@mvschools.org>, mcrncichhodge@mvschools.org <mcrncichhodge@mvschools.org>

Hello, Superintendent Kaufman, MVSD board members and Mr. Arroyo.

I have lived at 23 Lomita Drive and on Patricia Lane with my family for more than 60 years. I am writing to urge you to renovate the MVMS campus in its current location and not move it to 70 Lomita, which seems conspicuously impractical and highly objectionable for multiple reasons. I know you're receiving lists of those reasons from many concerned local families, so I will list only my most serious concerns, regarding safety, below:

Human Safety

This neighborhood was never designed or built to accommodate a large population of children, cars, recreation areas and parking lots. For one thing, we lack sidewalks—which means that bicyclists, pedestrians and people walking their dogs are not safe if drivers are not being conscientious (which they so often are not). The addition of a large population of children, coming and going, would be a great safety hazard for them and for those who live in the area. There are *already* times of day when I (who am elderly and disabled) cannot safely cross the street from my driveway because parents speed and drive recklessly to drop off and pick up their kids from Edna Maguire. Children in the area are also already riding electric bikes at dangerous speeds, as well. I urge you to come here and experience this for yourselves, especially on weekdays in the early morning and mid-afternoon.

The current middle school site has sidewalk access, is accessible, central and safe, with a certain amount of room to expand. Not only that, it is a short walk to the Mill Valley Rec Center and bike path, so kids can get to after-school activities and home relatively easily and securely.

Animal Safety

The other safety issue that many people care about but may forget to mention at this point in the process is a concern for the safety of animals and wildlife who also inhabit Lomita Drive and its peripheries. There are horses stabled on Horse Hill who are walked

for small stretches in the street by their owners but there are also wild animals (possums, raccoons, skunks, coyote, deer, foxes, domestic cats who think they're wild, and at least one bobcat) who come down into the neighborhood from the open space on the hill. It seems inevitable that increased traffic would have a harmful eff'ct on the wildlife beside which we are so privileged to live.

I have been gratified to live in Mill Valley as a place where urban planning has been pretty carefully considered and debated in order to accommodate both neighborhood residents and those passing through. Edna Maguire is a fine school where successful improvements have finally been completed, but only recently. Please don't try to squeeze two of the city's largest schools onto a single street, where residents and students will pay a very high price indeed. Meanwhile a large swath of more green, more open space where the existing campus is would become dormant.

Thank you for your consideration. I trust you will make the right decision.

Respectfully,
Catherine Moreno
--
Catherine Moreno
Oil paintings
www.cathmoreno.com

Responses to Catherine Moreno Comments

Please see Master Responses 1 and 3. Potential impacts from traffic to common wildlife are acknowledged.

90. Ben Wright Comments

> On Sep 13, 2025, at 11:59 AM, Ben Wright <wwright38@gmail.com> wrote:
>
>
> Dear Superintendent and Board Members:
>
> I am writing to you in support of and to advocate renovation of the existing Mill Valley Middle School Campus.
>
> Renovating and modernizing the existing Mill Valley Middle School campus represents the most practical and lowest-risk solution to achieve the community's goals to improve the Middle School. My perspective is informed by over 20 years of experience as a Professional Engineer in construction management for public and healthcare facilities, as well as my perspective as a parent with two children in the district—one in transitional kindergarten and one in second grade. The current Sycamore Avenue site offers established infrastructure and the ability to deliver state-of-the-art learning spaces while minimizing unforeseen challenges that frequently accompany new construction on unfamiliar parcels. Choosing renovation aligns with industry best practices for public stewardship by leveraging thorough site assessment, risk management strategies, and community engagement to preserve and maximize taxpayer value. Fiscal responsibility and operational reliability are paramount, and renovation enables the District to safeguard public funds, avoid unnecessary financial and schedule risks, and maintain continuity for Mill Valley families. Thank you for considering this perspective.
>
> Verily,
>
> Ben Wright
> 15 Loring Ave
> Mill Valley, CA 94941

Responses to Ben Wright Comments

Please see Master Response 1.

91. Stella Perone Comments

From: **stella perone** <smperone@yahoo.com>
Date: Mon, Sep 15, 2025 at 1:39 PM
Subject: MVMS should be renovated at existing site, NOT on Lomita
To: jarroyo@mvschools.org <jarroyo@mvschools.org>

Reasons are obvious- traffic and emergency safety.

Responses to Stella Perone Comments

Please see Master Response 3.

92. Evelyn Fung Carlon Comments

Hello. This is Evelyn Fung Carlon. Today is Mon 9.15.25.

I would like to propose that West America TKD & Edna McGuire not be displace because of their long standing history.

Know u need to use space. Can u place in the table to transfer the school administration to 70 lomita where it is unoccupied & make more use of current mv middle site.

Pls consider for safety measures.

Responses to Evelyn Fung Carlon Comments

Please see Master Response 2 regarding displacement of the dojo.

93. Sarah Coan Comments

From: **Sarah Coan** <sarahjanecoan2005@gmail.com>
Date: Mon, Sep 15, 2025 at 1:04 PM
Subject: West America Tae Kwon Do
To: jarroyo@mvschools.org <jarroyo@mvschools.org>

Hello,
I'm sending this email regarding West America Tae Kwon Do. I'm sure you've received many, but please take the time to read this one.

My name is Sarah Coan, and I'm currently a sophomore in college at Southern Methodist University. I'm 19 years old, and West America has been a part of my life since I was 4. Chantal, Roger, and their late father, Sensei, were the first role models I had that weren't my parents. They preach respect, discipline, and greatness. I know my life and all my West America friends wouldn't be the same if it weren't for them.

Chantal helped me with my college applications, gave me a place to volunteer and work, and showed me a side of my Korean culture I couldn't get anywhere else in a place like Mill Valley. I also went to MVMS, and I know you're trying to do what's best for you, but please consider Sensei has built the West America community for 42 years. This place is extremely special to me and so many others.

Sincerely,
Sarah Coan

Responses to Sarah Coan Comments

Please see Master Response 2 regarding displacement of the dojo.

94. Kerry Evdokimoff Comments

From: **Kerry Evdokimoff** <kerryevdo@yahoo.com>
Date: Tue, Sep 16, 2025 at 12:01 PM
Subject: Public Comment on Mill Valley Middle School Modernization
To: <jarroyo@mvschools.org>

Hi Julio,
I support improving school facilities, but placing a large middle school next to Edna Maguire in Horse Hill raises serious concerns. Lomita cannot safely handle the added traffic from drop-offs, pickups, service vehicles, and staff, especially given that the road condition is already poor and the city and county can't agree on who is responsible for paving it.

This neighborhood already carries the only Whole Foods, pharmacy, and post office in Mill Valley. Adding hundreds more daily car trips will create significant congestion for residents and people trying to access those essential services. As a resident of Horse Hill neighborhood, I urge the school district to consider alternative sites.

Kerry Evdokimoff
37 Meadow Drive, Mill Valley

Response to Kerry Evdokimoff Comments

Please see Master Responses 1 and 3.

95. Kim Obrien Comments

From: **kim 217istur** <kimobrienbangkok@yahoo.com>
Date: Tue, Sep 16, 2025 at 1:47 PM
Subject: MV Middle School Renovation
To: <jarroyo@mvschools.org>

Dear MV Schools,

The middle school portables should be placed on the current campus during the renovation period. This campus is in a central location. It is accessible via several main roads.

The location on Lomita does not have the capacity to handle the traffic and additional parking. Lomita, Tower, Meadow and Shell streets are already strained with the traffic from Edna Maguire drop off and pick up. These streets are also difficult to navigate mid day on Fridays from the traffic for services at the mosque on Shell Rd. The Lomita site is not as central, which will add more private cars delivering students than the current status quo.

The Lomita site can be rented to small private schools. This opportunity for future income should not be abandoned. Attracting a private school with portables in the future is unlikely. What about the added cost of demolishing this building itself?

There is the very real problem of disturbing a Miwok archeological site. This is not to be ignored.

To put the middle school at 70 Lomita Drive for three years would be a huge mistake. The congestion will be unmanageable. The current middle school site will be more inconvenient to most of the teachers and students. You will dismantle a future source of passive income for our district.

The portables should be placed on the current middle school site during renovation.

Sincerely,

Kim Obrien

Response to Kim Obrien Comments

The comment's concerns are noted. Please see Master Response 1, above regarding preferences of alternatives. Traffic and parking issues associated with potential alternatives involving the Edna Maguire/Terra Marin campus are described in the Alternatives chapter of the EIR and addressed in Master Response 3, above.

Archeological and tribal cultural resources issues associated with the Edna Maguire/Terra Marin site are addressed on pp. 5-12 and 13 of the EIR, which includes a mitigation measure for potential impacts to archaeological resources.

96. Clifford McGuire Comments

From: **219isturbe mcguire** <cliffordmcguire48@gmail.com>
Date: Tue, Sep 16, 2025 at 1:19 PM
Subject: MVMS Modernization
To: <jarroyo@mvschools.org>

To whom it may concern,

I am a long term resident of Mill Valley (43 years)
and home owner (42 years).

I feel strongly that the improvements of MVMS should be done at the existing location (Sycamore)
Why?

(1) the negative traffic impact on E. Blithedale will be huge, and unwarranted beyond any projections.

(2) there simply is not enough average at the second site.

(3) the existing site is very manageable to reach by the bike path.

Thank you

Clifford McGuire
1 Underhill Rd
Mill Valley, CA 94941
Sent from my iPhone

Responses to Clifford McGuire Comments

Pease see Master Response 3 regarding traffic issues at the Alternative site.

97. Joan Pata Comments

From: Joan Pata <jmpmoreau@gmail.com>
Date: September 15, 2025 at 11:48:23 AM PDT
To: undisclosed-recipients:;
Subject: Feedback on MVMS renovation proposal

Hello Mill Valley School District Board,

I am a resident of the Alto neighborhood in Mill Valley and a parent of three school children. I am writing to express my objection to the proposal to relocate Mill Valley Middle School (MVMS) to the current site of Terra Marin school on Lomita Drive.

The proposal to move the school, both temporarily or permanently, is absurd and not well thought out. Adding over 800 students, plus faculty, staff, visitors, and more to the small neighborhood would be a major disruption for Alto.

The neighborhood is not set up to support the amount of traffic this would bring. The morning and afternoon drop off and pick up from Edna Maguire already cause a major backup of traffic, specifically on Lomita, Ashford, and Meadow Drive. Adding a middle school to the neighborhood would add huge problems to an already existing traffic issue. I cannot get out of my driveway between 2:30 – 3:15pm most Fridays due to the backup of traffic. The current plan would include Edna Maguire losing some of its current parking and drop off/ pick up space. The current space is already tight and losing it would cause a parking disruption all throughout the neighborhood.

The number of disruptive middle schoolers who will descend to the neighborhood each day will be untenable. I say this with love as I have a child in middle school, and more to go through middle school. I fear the amount of trash this will add to the neighborhood as there are no public trash cans, except a very few for dog waste. Will the city increase the sanitation and clean up in the neighborhood if there are over 800 additional 11 – 14 year olds walking around the neighborhood and bike path? Will there be any repercussions for students who are disrespectful to Horse Hill, and any extra security for the horses that live there? How will it be handled if these students walk around the Edna Maguire campus, will any security be added to Edna's campus to ensure the 5 – 11 year olds are not being disrupted by middle schoolers? In addition, there is a preschool on site as well. What will the school district do to ensure the safety of preschoolers against disruption of over 800 middle school students?

The area where it is proposed to house the students is a cellular dead zone. How will the city and school support the cellular and wifi needs of all these students, and of the school without disrupting service for those who live in the neighborhood and work from home and need a guarantee of reliable wifi and cellular service.

How will the city manage the issue of the land being recognized by the Miwok Coastal tribe as a significant Native archaeological site? Will the land be properly handled with the respect required and owed to the tribe?

With the proposal of moving the Middle School it would cause West America Tae Kwon Do to have to move from its current home. This is a family-run, local business that supports an afterschool program for Edna Maguire students, and has been part of the Mill Valley community for decades. It would be a great loss for the full community if America West is no longer an available resource for the community. In addition, what after care will be put in place to continue to support the children and families who rely on America West TKD? Bright Horizons has limited space for students and is very costly.

I believe there is a proposal for the elementary school and middle school to share playing fields and gymnasium space. That fact alone explains why this plan has not been well thought out. There is not enough physical space to support the moving of part or all of MVMS to 70 Lomita Drive.

The current site of MVMS is large enough to support the school and its renovation needs. I understand parents do not want a school next to a sewer plant, but the Alto neighborhood cannot bear the brunt of a bad idea by a small and vocal group due to poor city planning many years ago.

I urge the Board to stop wasting funds, to move forward and honor the commitment of Measure G as it was passed by local citizens. Mill Valley schools have already failed my family once, please don't do it again.

Regards,
Joan

Responses to Joan Pata Comments

The comment's concerns are noted. Please see Master Response 1, above regarding preferences of alternatives. Please also see Master Response 2 regarding the potential displacement of the dojo. Traffic and parking issues associated with potential alternatives involving the Edna Maguire/Terra Marin campus are described in the Alternatives chapter of the EIR and addressed in Master Response 3, above. Archeological and tribal cultural resources issues associated with the Edna Maguire/Terra Marin site are addressed on pp. 5-12 and 13 of the EIR, which includes a mitigation measure for potential impacts to archaeological resources. Master Response 4 addresses concerns with the alternative site's acreage. Potential conflicts between middle school and elementary school students and issues with conceptual design of the alternatives are noted; these are not physical environmental issues addressed in CEQA. Wifi availability in the school is not an

environmental issue. Potential annoying behavior by middle school students in the Horse Hill neighborhood also is not an environmental impact under CEQA, but can be reported to the District.

98. Mythili and Krishna Devineni Comments

From: **Mythili Devineni** <mythilidevineni@gmail.com>
Date: Mon, Sep 15, 2025 at 11:04 AM
Subject: Public comment for MVSD middle school project
To: Julio Arroyo <jarroyo@mvschools.org>
Cc: Krishna Kosuri <kkosuri@gmail.com>

Julio

Thank you for taking public comments regarding the MVSD new middle school project.

We are Mythili Devineni and Krishna Kosuri, residents at 377 Molino Avenue, Mill Valley and parents to Mila Kosuri, who is in 1st grade at Old Mill Elementary School. We also have another daughter who will be entering Kindergarten next year.

We would like to register our deep concern for our children's and all the other students in Mill Valley School District's health and safety. We agree with the environmental study's concerns that the existing middle school is NOT SAFE given its prior use as a dump facility, the adjacent waste treatment plant that burns toxic gases and releases it into the air, and the rising flood and fire risks that put that facility and therefore our children at high risk.

We want to express our support for moving forward with building the middle school in the proposed area next to Edna MacGuire Elementary. We believe the environmental benefits outweigh the traffic inconvenience.

Even though it would be more inconvenient for us to go to the middle school if it were relocated to the new proposed location than if it were left at the existing site, given the relative distances and the traffic on Blithedale, we feel strongly that the middle school should not endanger our children's lives with extreme health risks.

Thank you for collecting public comments and taking ours into your consideration,
Mythili and Krishna

Responses to Mythili and Krishna Devineni Comments

The comments are acknowledged. Health Risk issues are discussed extensively in the EIR Hazards and Hazardous materials, and Air Quality chapters. Please also see Master Response 1 as well as Master Response 7 for an additional discussion of several items related to potential risks from existing environmental conditions..

99. Larry French Comments

From: Larry French <larrylfrench@gmail.com>
Date: Tue, Sep 16, 2025 at 3:23 pm
Subject: Mill Valley Middle School
To: <jarroyo@mvschools.org>

To whom it may concern:

I think most of the issues regarding using the site on lomita drive have been addressed. Regardless, I think the proposal has not been thought out well. I have lived here on Lomita Drive for well over 30 years. Construction of the Edna Maguire school was very difficult for us, the local residents. One might describe it as a disaster as the local school district lost control of the project and their General Contractor. In addition there was not a single individual on the District's "Design Review Board" who was in the business or had any knowledge of the design process. Please don't make the same mistakes again.

Larry French
owner of 77 Lomita Drive

Responses to Larry French Comments

The comments are acknowledged. Please see Master Response 1.

100. Julie Duryea Comments

From: Julie Duryea <julie.duryea@me.com>
Date: Mon, Sep 15, 2025 at 9:07 AM
Subject: MVMS Vote
To: <jarroyo@mvschools.org>

I have two boys who went to Edna. One is currently at the middle school now and the other is at Tam. I have been in Mill Valley for over 10 years. I strongly urge the middle school to be built at the Edna Maguire site. It makes sense on every front. It's disgusting to have our kids near the sewage plant. Flooding and other environmental issues at the current site should make it a no-brainer to build this new school at Edna.

Julie Duryea

Responses to Julie Duryea Comments

The comments are acknowledged. Please see Master Response 1. Flood hazards are addresses in the Hydrology and Water Quality Chapter of the EIR.

101. Teresa McGlashan Comments

From: **Teresa McGlashan** <teresamcglashan@gmail.com>
Date: Sun, Sep 14, 2025 at 9:54 PM
Subject: Move the middle school to 70 Lomita Ave.
To: <jarroyo@mvschools.org>

To whom it may concern,

I'm writing to express support for moving the middle school to the 70 Lomita Ave. location. I am a long time Mill Valley resident and both of my children graduated from Tam high school.

For as long as I can remember, the Mill Valley middle school has seemed "cursed" by terrible smells, ugly architecture, and a kind of malaise that speaks to its unfortunate feng shui. I sent my kids to a private middle school rather than send them to Mill Valley middle school. I feel badly for the kids that have to go to school there.

Let's give our middle schoolers a fresh start. Let's build a middle school that's beautiful, healthy, away from the sewage treatment plant and not built on a former dump. They deserve something better.

Warmly,
Teresa McGlashan
Mill Valley

Responses to Teresa McGlashan Comments

The comments are acknowledged. Please see Master Response 1. Please also see the EIR's Air Quality section as well as the discussion of Air Quality in the Alternatives section for an analysis of potential impacts from odors.

102. Helen Maguire Comments

From: **helleleo@aol.com** <helleleo@aol.com>
Date: Sun, Sep 14, 2025 at 9:30 PM
Subject: Public comment: West America Tae Kwon Do location
To: <jarroyo@mvschools.org>

For years West America Tae Kwon Do has operated out of a sliver of an almost forgotten small building at 70 Lomita Dr. Sensei Roger Carlon and now his daughter and son have made a huge impact on the kids and families of Mill Valley. They are a black belt school and have trained numerous accomplished martial artists. Most importantly though, they have provided a home for many young people who needed support and discipline at vulnerable stages of their lives. The return to our community from your rental of this small space is unsurpassed. Mill Valley would be a different less welcoming place for the young if West America TKd were evicted from their home at 70 Lomita Dr.

Leave them there please, for the sake of future generations of Mill Valleyites!!!!

Helle McGuire

Responses to Helen Maguire Comments

Please see Master Response 2.

103. Ted Lee Comments

From: **T. Lee** <theodorejlee@yahoo.com>
Date: Sun, Sep 14, 2025 at 9:11 PM
Subject: Opposed to relocating MVMS
To: jarroyo@mvschools.org <jarroyo@mvschools.org>

Hello Mr. Arroyo,

I am writing to express my strong opposition to moving the middle school. The central location provides easy access from across the community, with good roads, proximity to the nearby community center and sports fields, and adequate space for parking for staff and visitors.

The proposed relocation to the site adjacent to Edna Maguire is faulty. It makes a school that can be reached by walking by most of Mill Valley into a school that is much harder to access by foot. There is limited space for parking. And the road access is terrible. Lomita Drive is effectively a one lane street during the morning due to parked cars or stopped cars coming from the direction of the Whole Foods Market, and in the other direction Lomita Drive is in face a one lane road with a shared lane by Horse Hill.

I understand you probably are being forced to consider this suboptimal substitution, but please realize it is not a suitable site for a new middle school and I strongly oppose it.

With regards,

Ted Lee

Responses to Ted Lee Comments

Please see Master Responses 1 and 3.

104. Thais Nye Derich Comments

From: **Thais Nye Derich** <tderich@gmail.com>
Date: Sun, Sep 14, 2025 at 5:35 PM
Subject: Public comment
To: jarroyo@mvschools.org <jarroyo@mvschools.org>

Dear Mr. Arroyo,

I'm in support of MVMS at its current location and against the Terra Marin location.

I live at 55 Lomita Dr, Mill Valley, CA 94941 and have two kids who went to MVMS as well as my husband.

It's the better location option.

Thank you,

Thais

Responses to Thais Nye Derich Comments

Please see Master Response 1.

105. Brad and Emma Tewksbury Comments

From: **Brad Tewksbury** <btewks@gmail.com>
Date: Sun, Sep 14, 2025 at 1:16 PM
Subject: Against MVMS Option at Edna/Terra Marin
To: <jarroyo@mvschools.org>
Cc: Emmeline Yu Tewksbury <emmeline.yu@gmail.com>

School Board for MVMS:

Why Option 1 is the Only Viable Path Forward

In June 2022, the citizens of Mill Valley overwhelmingly approved **Measure G**—a $194 million bond with **$134 million earmarked specifically for Mill Valley Middle School**. This was not a close call: 68.4% voted "yes," including the 80% of residents who don't even have children attending schools in the district. That vote was a rare mandate, a promise that the town believes in providing state-of-the-art schools for its kids.

Three years later, not one brick has been laid. The budget for MVMS has already slipped from $134 million to **$95 million**, eroded by delays, legal fees, and studies commissioned to answer every concern raised. Each year of delay costs taxpayers **another $8 million** in lost purchasing power. The risk now is not just financial it is reputational. Voters will not support future bonds if their faith in this one is squandered.

Like every new proposal for a project this large and vital to our community, there will always be reasonable concerns that need to be addressed. But we all have to remember we live in an overregulated state that often kills large projects like this if we let great get in the way of good. Good is achievable and moves the ball forward. Great is often theoretical, expensive, or forever out of reach. And recall the goal of the school board is to deliver a new school that the Majority of voters would approve.

The school board has bent over backwards to try and respond to every objection to rebuilding on the current **13.75-acre Sycamore site**. The exhaustive environmental report confirmed the site is safe: no toxins, no leaks, no health issues in 53 years of continuous use. And reviewing MarinMaps' sea level rise projections that look 100 years out, one finds both MVMS and Edna would not directly be affected by sea level rise, but the ingress and egress paths would be for both sites, so neither would make a good option to build on given this information. However, per my comment above about great getting in the way of good. We can forge ahead with remodel on the current Sycamore site NOW and the county, town of MV has 50 years to plan for dealing with sea level rise across the entire county, much less MVMS.

The plan on the table for **Option 1**, remodels on the existing footprint, no soil disruption, no excavation. It delivers on most all the middle school upgrades promised, while keeping the campus central, walkable, and large enough to meet state guidelines and future enrollment. Students would be placed in temporary portable classrooms adjacent to the current MVMS buildings, similar to the Edna Maguire rebuild that completed in Jan of 2014 as part of Measure C. in the Lomita, Alto, neighborhood.

Unfortunately, there is a small group of opponents (obstructionists) who have shifted tactics to stall the plans, yet again, for option 1, a remodel at the current Sycamore location. Their latest proposal eferred to as **Option 2** would have the school board look into new middle school at the combined **Edna Maguire/Terra Marin site**, which according to Marin county APN# 030-161-13 states that 70/80 Lomita Drive is comprised of 511,830 SQ/FT of land. This sq/ft translates to 11.75 acres of which Edna Maguire takes up 6+ acres leaving 5+ acres for a new middle school at the Terra Marin property. Really? That is an 6**0% reduction** in campus size from Sycamore site and far below California's recommended standards.

Edna currently houses 430 elementary students on 6+ acres and it almost feels full. Add another 760+ students, a 177% increase in students, to a smaller lot of 5+ acres where Terra Marin resides and some think that is a sensible and viable option? One doesn't need to conduct a traffic study to understand the residential neighborhood would be at a breaking point. And to compound matters, Lomita Drive is about to undergo a multi-year road rehabilitation. The result would be chaos for families, commuters, and neighbors alike. And frankly is irresponsible. Finally, in 2012 there was a lawsuit settlement related to parking matters around Edna Maguire, which shows it is an issue with only 430 students.

Option 2 also requires demolishing Terra Marin buildings, displaces long-standing community tenants who play a vital role in aftercare programs for Edna families who have two working parents and require an aftercare program to make ends meet. Furthermore, Edna Maguire would be disrupted for a second time in a decade, not to mention it overlays new construction on Coast Miwok archaeological sites. Add in an annual **$750,000 busing bill** to mitigate traffic, and the numbers only get worse.

The law is clear: elected boards must act in the best interest of the entire community, not just respond to the shifting objections of a small minority. The voters approved Measure G to **modernize Mill Valley Middle School at its existing location**. Option 1 honors that mandate and while not perfect for all, it meets the overwhelming number of goals for the majority to deliver a modern, up-to-date school our kids can thrive in. Option 2 defies it, wastes scarce funds, proposes completely unresponsible options that would

overwhelm an already stressed neighborhood, and risks collapsing public trust for years to come.

Finally, there is one $24M question that hovers over any plan to green light option 1 and that is will we be required to use DSM from the state for the temporary portable school classrooms that students would use during the remodel process? It was not required for the Edna rebuild, not sure why these temporary structures that stand 10 feet high would need DSM.

The board's fiduciary duty is not complicated here. Option 1 is the only viable path forward.

Kind regards,

Brad and Emma Tewksbury

Parents of one kid MVMS and one kid at Edna

Responses to Brad and Emma Tewksbury Comments

Please see Master Responses 1-4.

106. Michael Cummins Comments

September 14, 2025

Sent Via U.S. Mail and Email

Mill Valley School District
Attn: Julio Arroyo, Director of Maintenance and Operations
411 Sycamore Avenue
Mill Valley, CA 94941

jarroyo@mvschools.org

Re MVMS Modernization EIR

Opposition to Relocation

In 2022, my wife and I voted for measure G even though our children no longer attend schools in the Mill Valley School District ("District") and our taxes would increase. As our boys previously attended Edna Maguire (one before modernization and one after) and the Middle School, we did so because we believed that modernizing and upgrading the Middle School and other elementary schools in the district was best for the community.

In voting for measure G, however, we understood that bond funds directed to the Middle School would only be used to upgrade, reconstruct, reconfigure and rebuild the facilities at its current location, as was done previously with Edna Maguire. This understanding was based on the ballot proposal, language of the text and the other pro-G literature (online and print) circulated. Had there been any representation, disclosure or warning that the funds could be used for the purpose of relocating the Middle School and constructing a new one at Edna Maguire, as currently being considered, we would have voted NO, and we are confident that most other residents would have voted the same way.

Putting aside the fact that relocating the Middle School to the Edna campus is simply a bad and untenable option that would cause numerous adverse effects to the students at Edna and the residents who live near that school as a result of the construction and an additional 750+ students being located at that site, which necessarily includes significant traffic issues, I am most concerned about the fact that the proposed relocation option is directly at odds with what we understood the funds would be used for when we voted for Measure G.

Responses to Michael Cummins Comments

Please see Master Response 1.

107. Wendy Dalia Comments

From: **W Dalia** <wendyedalia@gmail.com>
Date: Sun, Sep 14, 2025 at 6:47 AM
Subject: Fwd: Protect West America Tae Kwon Do
To: jarroyo@mvschools.org <jarroyo@mvschools.org>

To Whom it May Concern,

Leave West America Tae Kwon Do alone! They are a part of the Mill Valley fabric and an incredible family owned business that creates community and family for young children through adults way beyond teaching martial arts. Mill Valley has already lost so much of what has made it special with development and out pricing. This dojo is part of so many Mill Valley families' hearts and has been for their entire 42 years!

Work with them. Support them. Protect them.

—Wendy Dalia

Mill Valley resident and tax payer since 2005

Responses to Wendy Dalia Comments

Please see Master Response 2.

108. Anthony Dailley Comments

From: **Tony Dailley DDS** <tonydailley@gmail.com>
Date: Sat, Sep 13, 2025 at 11:19 PM
Subject: Middle school decision
To: <jarroyo@mvschools.org>

Dear Mr. Arroyo,

I am writing you regarding the impending decision on whether to build a new Middle School next to Edna McGuire School or to renovate the existing middle school at its present location. I have been living in Mill Valley for 40 years and I live in the neighborhood near the Edna McGuire School, and I am keenly aware of the what takes place in the surrounding neighborhood. During that time, I have seen the evolution of Mill Valley and we clearly have a congestion problem in the city that has done nothing but worsen.

The most logical location for the middle school is its present location. It presents easy access for the students and the throng of parent who drop their kids off at school. It also has plenty of space to accommodate the needs of the middle school. The environmental impact report has shown the location is safe, and this fact cannot be denied. I am aware that there are some parents that are voicing concerns that the present location is unsafe but this is an emotional concern that is not based on hard science and facts. The decision on where the middle school should be must be based on hard facts, not emotions, and it is the job of the Mill Valley school board and others involved in the decision process to follow the facts. Unfortunately, today we live in a world where people are increasingly ignoring real science and facts, and decisions are being increasingly made based on emotions. These never play out well.

The proposal to move the school to the, as I understand it, the 4 acre plot adjacent to Edna McGuire School doesn't make any sense for a number the following reasons:

1. The space is inadequate to handle the middle school, and there would likely be numerous compromises that would have to be made and the children would suffer for it.

2. There is inadequate space for parking for staff and parents in the small space.

3. There would not be sufficient space for the athletic fields the kids would need for sports.

4. The traffic congestion would become an intolerable situation to both the residents of the area and for the parents taking their kids to and from school, and safety risks would rise.

Regarding the congestion problem, I have witnessed the increase in congestion in the Alto District for many years due to the school. At the present time the congestion gets pretty severe during drop-off and pick-up times and often makes it very difficult for residents to drive in their own neighborhood. It is not uncommon for the traffic becomes gridlocked and I have been late to appointments on a number of occasions because of this. Very importantly I have witnessed a significant rise in risk of injury to students and residents from this congestion. Seeing a parent rushing their kids to school is a common thing to see and gets to be bit maddening at time because parents will sometimes drive up to 45 mph in the 25 mph zones. Even today the risk of accidents jumps up significantly during pick-up and drop-off times. Moving the middle school next to Edna McGuire would make the congestion intolerable and increase the safety risks for both the residents of the area and the parents.

There are also some private businesses and schools presently operating in the proposed space that would likely have to close, or at best be relocated. Their options for a new location would not be good. Presently their impact to the neighborhood is insignificant.

In conclusion, moving the middle school next to Edna McGuire has many downsides and pitfalls, whereas keeping the school where it is does not. I implore you to not move the school but instead renovate the school and keep it at its existing site. There are no logical reasons to not keep it there.

Sincerely,

Dr. Anthony Dailley

Responses to Anthony Dailley Comments

Please see Master Responses 1-4.

109. Richard Davis Comments

From: **Richard Davis** <richardedavisii@gmail.com>
Date: Sat, Sep 13, 2025 at 8:20 PM
Subject: Please Keep West America TKD in Its Home
To: <jarroyo@mvschools.org>
Dear Mill Valley School District Board,

I strongly urge you not to displace West America TKD & After Care from its Lomita Dr. location. For 42 years, this dojo has been more than a building—it's been a safe, supportive community where children and families learn discipline, confidence, and respect.

Losing this space would disrupt a legacy that has shaped generations. Please find a solution that allows the middle school renovation to move forward without forcing West America from the home it has built with this community.

Thank you for your consideration.
Sincerely,

Responses to Richard Davis Comments

Please see Master Response 2.

110. Lee Wilson Comments

From: **Lee Wilson** <theleewilson@gmail.com>
Date: Wed, Sep 17, 2025 at 12:44 PM
Subject: Re: Mill Valley Middle School Modernization Update Meeting
To: Julio Arroyo <jarroyo@mvschools.org>

Okay, feel free to use this.

After reviewing the EIR, it shows that the construction impacts are manageable through proper mitigation and I think the project should move forward. The district's goal is to provide a modern, safe school for our children, and this project achieves that while addressing the site's environmental constraints. The analysis shows risks can be effectively managed with identified measures. While I understand community concerns about construction disruption, we must consider the long-term benefits of a seismically safe, modern facility that will serve thousands of Mill Valley families for decades to come.

Responses to Lee Wilson Comments

The comment is acknowledged. Please see Master Response 1.

111. Corey Lydstone Comments

From: **Corey Lydstone** <clydstone@gmail.com>
Date: Thu, Sep 18, 2025 at 9:42 AM
Subject: Support for Moving Forward with MVMS Renovation at the Existing Site
To: <jarroyo@mvschools.org>
Cc: Elizabeth Kaufman <ekaufman@mvschools.org>

Hi Julio,

I am writing as a parent of two children at Strawberry Point Elementary, Javi and Rafa, and as a member of the district's Budget Advisory Committee. I want to express my strong support for moving forward with the plan to renovate Mill Valley Middle School at its existing Sycamore Drive site.

Having seen firsthand the financial strain this project's uncertainty has placed on our schools and community, I believe it is critical that we move ahead without further delay. The decision has already been made to proceed with the existing campus, and every additional year of delay reduces the project's scope and budget while eroding credibility with the community.

Renovating the current site offers several clear advantages:

- It is fiscally responsible, aligning with the $95 million budget and avoiding the additional costs of a full rebuild.
- It keeps 6th–8th grade students together on one central, 18.5-acre campus, supporting both community cohesion and capacity for future enrollment growth.
- Extensive testing and the Environmental Impact Report confirm renovations can be done safely with appropriate mitigations.
- It minimizes disruption to neighborhoods, traffic patterns, and community services compared to the alternative site.

Most importantly, this path reflects the will of the community. Families across the district have expressed strong preference for renovating the existing site, and I trust our district leadership to deliver a safe, modern campus that will serve Mill Valley students for the next 50 years.

Thank you for your leadership on this critical project and for ensuring that the Measure

G bond funds are put to work as our community intended.

Sincerely,
Corey Lydstone

Responses to Corey Lydstone Comments

Please see Master Response 1.

112. Matt Coan Comments

From: **Coan, Matt (MMA)** <Matt.Coan@marshmma.com>
Date: Wed, Sep 17, 2025 at 1:29 PM
Subject: West America TKD
To: jarroyo@mvschools.org <jarroyo@mvschools.org>

Hello Julio.

It has come to my attention that West America TKD is at risk for being displaced from their current location.

Our family has had a very long and strong connection to that dojo and to the Carlon family. They are vital to the health of the MV community and have been for many, many years. We support them unequivocally and I urge you to allow them to keep their current location and physical space. Removing them will jeopardize their ability to serve our community and would result in a big loss, both for their family, its legacy, and the community at large.

Please enable them to continue to operate at their current dojo- they are a special family and our community needs them.

Matt Coan

Responses to Matt Coan Comments

Please see Master Response 2.

113. Ben O'Brien Comments

From: **ben o'brien** <ben_sfx1@mac.com>
Date: Thu, Sep 18, 2025 at 10:11 AM
Subject: Please Keep West America TKD in Its Home
To: <jarroyo@mvschools.org>

Dear Mill Valley School District Board,

I strongly urge you not to displace West America TKD & After Care from its Lomita Dr. location. For 42 years, this dojo has been more than a building—it's been a safe, supportive community where children and families learn discipline, confidence, and respect.

Our daughter, soon to be 16 years old has been going at the Dojo for almost a decade. It is a safe place for her and all of her fellow taekwondo students & friends.

Losing this space would disrupt a legacy that has shaped generations. Please find a solution that allows the middle school renovation to move forward without forcing West America from the home it has built with this community.

Thank you for your consideration.
Sincerely,
Ben O'Brien

Responses to Ben O'Brien Comments

Please see Master Responses 1 and 2.

114. Alexandra Mortenson Comments

From: **Alexandra Mitchell** <alexpachnermitchell@gmail.com>
Date: Thu, Sep 18, 2025 at 8:56 AM
Subject: Middle School
To: <jarroyo@mvschools.org>

Hi,

I'm a parent of 3 boys (2 in the district, 1 incoming) and I wanted to write to voice my support of keeping the middle school at its current location, having children in portables on site during the construction and breaking ground ASAP.

Thanks,
Alex

—
Alexandra Mortenson

Responses to Alexandra Mortenson Comments

Please see Master Response 1.

115. Catherine Provencal Comments

From: **Catherine Provencal** <catherineprovencal@gmail.com>
Date: Thu, Sep 18, 2025 at 10:20 AM
Subject: Please Keep West America TKD in Its Home
To: jarroyo@mvschools.org <jarroyo@mvschools.org>

Dear Mill Valley School District Board,

I strongly urge you not to displace West America TKD & After Care from its Lomita Dr. location. For 42 years, this dojo has been more than a building—it's been a safe, supportive community where children and families learn discipline, confidence, and respect.

Our daughter has been going to the Dojo for over 8 years. This is a safe place for her and her fellow students & friends of the Dojo.

Losing this space would disrupt a legacy that has shaped generations. Please find a solution that allows the middle school renovation to move forward without forcing West America from the home it has built with this community.

Thank you for your consideration.
Sincerely,

Catherine Provencal (Mother)

Responses to Catherine Provencal Comments

Please see Master Responses 1 and 2.

116. Penni Gladstone Comments

From: **Penni Gladstone** <penni@pennigladstone.com>
Date: Wed, Sep 17, 2025 at 6:20 PM
Subject: Letter about proposed middle school on Lomita
To: jarroyo@mvschools.org <jarroyo@mvschools.org>

The Mill Valley School District is considering building a new 950 student middle school at 70 Lomita Drive, next to Edna Maguire Elementary, due to rising costs and legal issues at the current site. But this move would bring serious impacts to our quiet neighborhood. The District's own report says traffic would exceed capacity causing backups, blocked driveways, and unsafe conditions for kids walking or biking. Parking is already limited, and adding hundreds more students and staff would make it worse.

Construction noise, dust, and poor air quality for 2 to 3 years would disrupt learning for our youngest students. In emergencies like wildfires, extra traffic could block evacuations and delay emergency response. The site will disturb Native American cultural resources, and wildlife, risking major delays. Our neighborhood already manages the burden of Edna Maguire. Adding a middle school just increases the strain. A better solution is to renovate the existing middle school campus, which is larger, centrally located, and safer for everyone. We are speaking up and make sure the district makes the right choice for everyone.

Penni Gladstone & Peter Graumann

111 Cornelia Avenue, Mill Valley

Response to Penni Gladstone Comments

Please see Master Response 3 regarding traffic and parking, including emergency response. Construction dust and noise impacts are addressed in the Air Quality and Noise chapters of the EIR, respectively.

As with the MVMS Replacement Campus Project, **Mitigation Measure 3.2-1 through 3.2-8** would also be required to reduce fugitive dust and combustion emission impacts for the Edna Maguire Alternatives. These mitigation measures would likely reduce air quality impacts for students/staff at the existing elementary school and nearby residence to **less than significant**. Although the air quality impacts at nearby residence associated with Edna Maguire Alternatives may be higher than the air quality impacts at nearby residence associated with the MVMS Replacement Campus Project, it would be expected to be **less than significant with mitigation measures.**

Temporary construction noise impacts from the Edna Maguire Alternatives would likely result in a **significant and unavoidable impact** to students and staff at the Edna Maguire campus (similar to the MVMS Replacement Campus Project).

Temporary construction noise impacts from the Edna Maguire Alternatives would likely result in a **significant and unavoidable impact** to nearby noise-sensitive receptors (compared to a **less than significant impact** for the MVMS Replacement Campus Project). This is because the noise-sensitive receptors along Lomita Drive would be much closer to the construction activities occurring at the Edna Maguire campus compared to the noise-sensitive receptors nearby the MVMS Replacement Campus Project.

For the two previous noise impacts, **Mitigation Measures 3.9-1, 3.9-3, and 3.9-4** would be applicable to construction activities for the Edna Maguire Alternatives. However, any type of construction noise barrier (as detailed in **Mitigation Measure 3.9-2**) would not be feasible due to potential circulation and vehicle access issues at the Edna Maguire campus.

The increase in traffic noise levels at noise-sensitive receptors nearby the Edna Maguire campus would likely result in a **significant and unavoidable impact** to nearby noise-sensitive receptors (compared to a **less than significant impact** for the MVMS Replacement Campus Project). This is because Lomita Drive (a two-lane road) would be the main road used to access the school and the Edna Maguire Alternatives would likely result in a significant increase in vehicle trips on this roadway. In addition, noise-sensitive receptors along Lomita Drive would be closer to traffic noise compared to the noise-sensitive receptors nearby the MVMS Replacement Campus Project access roadways. There would be no feasible mitigation measures to reduce traffic noise level increases for the Edna Maguire Alternatives.

Thus, the Edna Maguire Alternatives would likely result in greater construction noise and traffic noise impacts compared to the MVMS Replacement Campus Project.

Tribal Cultural Resources at the alternative site are addressed in Chapter 5, Alternatives, which includes a mitigation measure for that site. Wildlife resources at that site also are addressed in Chapter 5. The comment's preferences are noted and addressed in Master Response 1.

117. Alexa Shively Comments

From: **Alexa Shively** <alexashively@gmail.com>
Date: Thu, Sep 18, 2025 at 2:18 PM
Subject: Support for MVMS Renovation
To: Julio Arroyo <jarroyo@mvschools.org>, <harlan.reymont@dgs.ca.gov>, <stephen.ito@dgs.ca.gov>
Cc: Natalie Katz <nkatz@mvschools.org>, <eabdoli@mvschools.org>, Sharon Nakatani <snakatani@mvschools.org>, <mcrncichhodge@mvschools.org>, <yyoo@mvschools.org>, Elizabeth Kaufman <ekaufman@mvschools.org>, Jordan Shively <jpshive@gmail.com>

I'm reaching out as a parent with 3 (soon to be four!) children in the MVSD

Like most parents in the district, we support renovating the middle school at the current 14-acre site and keeping grades 6–8 together in portables there during construction. This is the most practical and popular solution among parents we've spoken with.

Our concern is simple: every delay, extra study, or detour wastes millions. With costs rising, each year of waiting cuts the budget by nearly $10M, putting the entire project at risk. Voters approved these funds to build a school for the next 50+ years — not to watch money disappear.

The site is central, bikeable, and already part of our kids' lives. Teachers and staff are doing incredible work despite limited facilities; it's time to give them the campus they deserve.

We trust district leaders to ensure safety and use funds wisely — but now is the moment to act. Please move forward and break ground in June 2026.

Thank you,

Alexa Shively

Responses to Alexa Shively Comments

Pease see Master Response 1.

118. Ian Kenney Comments

From: **Ian Kenny** <ianmichaelkenny@gmail.com>
Date: Thu, Sep 18, 2025 at 2:26 PM
Subject: Public Comment on Mill Valley Middle School Modernization Draft EIR
To: <jarroyo@mvschools.org>

Hi Julio,

I am a Mill Valley School District parent commenting on the Mill Valley Middle School Modernization Draft EIR. I support renovating the existing middle school building rather than building new facilities at 70 Lomita.

Key Concerns with 70 Lomita:

Traffic & Parking: Building at 70 Lomita would flood Lomita Drive with excessive traffic, burdening surrounding neighborhoods. The site lacks sufficient parking for the population increase from 500 to 1,350 students/staff, especially with plans to remove 43 existing parking spaces.

Site Inadequacy: At only 4 acres, 70 Lomita cannot adequately house a middle school compared to the current 14-acre site. Elementary and middle schoolers would be forced to share play spaces and gyms, which is developmentally inappropriate.

Community Disruption: Edna Maguire was just renovated in 2014 and shouldn't face another major disruption. The beloved taekwondo studio and aftercare program would be displaced, removing an important community resource families rely on.

Educational Impact: Middle schoolers should remain together in one location to build community before high school, not be split between sites.

Benefits of Renovation:

- The EIR confirms renovation with on-site portables is safe
- New HVAC systems can address any odor concerns
- Maintains central location supporting walking/biking to school
- Leverages the most appropriate site size per state guidelines

Please include these comments in the Draft EIR under my name.

Thank you,

Ian Kenny

Responses to Ian Kenney Comments

Please see Master Responses 1, 2, 3, and 4.

119. Brooke Simmons Comments

From: **Brooke Simmons** <brooke.ld.simmons@gmail.com>
Date: Thu, Sep 18, 2025 at 3:30 PM
Subject: Commentary on Draft EIR and MVMS options
To: jarroyo@mvschools.org <jarroyo@mvschools.org>

Dear Mr. Arroyo and the MVSD board,

My name is Brooke Simmons and I am a parent of a current 1st grader at Edna Maguire and 3 year old that currently attends Tamalpais Preschool (across from the middle school) and a future Edna student.

I am also a Certified Industrial Hygienist (CIH) and Environmental Health Scientist. Therefore, I am very familiar with the types of exposure considerations that go into the decisions being made regarding potential impact to students, staff, and surrounding community members.

Based on my review of the draft EIR, it is clear to me that the best decision, both environmentally and financially, is to renovate the middle school at the current site with temporary housing also on site. As the EIR states, the exposure and human health risk assessments used worst-case scenario data and likely GREATLY overstate any potential exposures or risk. This project has been delayed for far too long and it is time to take action!

With regard to alternatives involving the Edna Maguire campus, that I visit essentially every day as a parent and neighbor, it is clear that the following are true:

- The available space is inadequate. The 4-acre Lomita site is not sufficient for co-locating an elementary and middle school. Clearly, co-mixing of middle and elementary students would be necessary on fields and facilities. This does not make sense for the educational and safety needs of all.

- Traffic congestion in the area is already a problem. I cannot fathom the issues that this would introduce by co-locating a middle school in the area. I live on a street not traditionally thought to be impacted by traffic (Vasco Drive), but every day, we have parents parking here and walking in on paths due to the traffic congestion already in place as we already house the largest elementary school in town.

- Displacement of West America – the vibrant community at West America would be displaced. This is a resource not only for our children, but many in the community. They are also an after school care option for families, which is already difficult to come by for working parents, such as myself.

- Cultural impact – the potential to disturb Native American artifacts has already been demonstrated through the recent Edna Maguire construction.

It is clear to me that the most rational, safe, and responsible option is renovating the existing middle school with temporary 6-8th grade housing in portables on site. This option seems to be the most supported throughout the broader community.

Thank you so much,

Brooke Simmons

Responses to Brooke Simmons Comments

The comment's concerns are noted. Please see Master Response 1, above regarding preferences of alternatives. Traffic and parking issues associated with potential alternatives involving the Edna Maguire/Terra Marin campus are described in the Alternatives chapter of the EIR and addressed in Master Response 3, above. Archeological and tribal cultural resources issues associated with the Edna Maguire/ Terra Marin site are addressed on pp. 5-12 and 13 of the EIR, which includes a mitigation measure for potential impacts to archaeological resources. Master Response 4 addresses concerns with the alternative site's acreage.

120. Lois Campton Comments

From: **lois campton** <lois.campton.misc@gmail.com>
Date: Fri, Sep 19, 2025 at 8:20 AM
Subject: MV Middle school
To: <jarroyo@mvschools.org>

Mr Arroyo and School Board Members,

I am writing to express my strong support for keeping our middle school at its current location rather than moving it across town.

Relocating the middle school to the site of the current elementary school would create unnecessary disruptions for families, students, and the community. The current location is central, accessible, and already established as the home of our middle school. For many families, moving the school would increase travel times, complicate daily routines, and create transportation challenges and increase traffic throughout our town.

Beyond logistics, the current site carries important community value. It is part of the identity of our town, and generations of students have attended school there. Remodeling and reinvesting in the existing location preserves that history while modernizing the facilities to meet today's needs.

I recognize that the board is considering this decision carefully, but I strongly urge you to prioritize renovating the middle school where it stands. This option respects our community, minimizes disruption, and ensures that resources are used to improve what we already have rather than relocating an entire school.

Thank you for your time and consideration.

Sincerely,

Lois Campton
921 Alturas way, MV

Responses to Lois Campton Comments

Please see Master Response 1.

121. Lisa Barnes Comments

from: **Lisa Barnes** <lisa_barnes@yahoo.com>
Date: Thu, Sep 18, 2025 at 8:24 PM
Subject: EIR MVMS
To: <jarroyo@mvschools.org>

The added costs of building the middle school at its current location does not seem feasible. Plus everyone has always complained about the proximity of sewage treatment plant next to a school.

However the alternative at Terra doesn't seem feasible either. Having Edna and MVMS in such close proximity will be a nightmare for traffic and the neighborhood (no I don't live near there)

Why not just take over Edna Maguire and convert it to MVMS? With the reduction of elementary enrollment the Edna students could be absorbed in the other Mill Valley elementary schools. A town of Mill Valley size does not need 5 elementary schools. Mill Valley needs a nice new middle school and Edna is the largest and most modern. It seems to convert and possibly do some remodeling would be much less expensive than building a new school.

Thank you for reading.

Lisa Barnes
MV resident
Raised 2 kids who attended both Edna and MVMS

Responses to Lisa Barnes Comments

Please see Master Response 1. The alternative of converting the existing Edna Maguire School to a middle school is addressed as Alternative 4, in Chapter 5, Alternatives, in the EIR.

122. Dana McQueen Comments

From: **Dana McQueen** <dana.b.mcqueen@gmail.com>
Date: Thu, Sep 18, 2025 at 10:55 AM
Subject: Mill valley middle school
To: <jarroyo@mvschools.org>

Hi,

I understand there is a big push to renovate the middle school and keep it in the current location. As a physician and mother of a kindergarten and 2nd grader, I have concerns over the soil report and potential toxin exposure. Knowing that there are higher rates of cancer in our area, I think this is especially important to recognize.

Thank you for carefully looking at environmental safety.

Dana McQueen, MD
Mother of Claire and James (2nd and K at Strawberry point)

Responses to Dana McQueen Comments

Please see Master Response 1. Soil toxicity and associated health risks are addressed in the Air Quality and Hazards and Hazardous Materials sections of the EIR.

123. Patricia Kittredge Comments

From: **Patricia Kittredge** <patricia.kittredge@gmail.com>
Date: Wed, Sep 17, 2025 at 4:10 PM
Subject: mill valley middle school modernization project
To: <jarroyo@mvschools.org>

Dear Members of the Mill Valley School District Board,

I am writing as a resident of the neighborhood and a supporter of the Mill Valley Middle School modernization project. I strongly support moving forward with the project at the existing middle school site on Sycamore Drive, as approved by voters through Measure G. Renovating the current campus provides a fiscally responsible, environmentally sustainable, and educationally sound path that will ensure safe and inspiring facilities for our students for decades to come.

I am, however, firmly opposed to using 70 Lomita Drive—either temporarily or permanently—as a middle school site. There are several compelling reasons why this location is not appropriate:

Traffic and Parking Impacts

Locating nearly 800 middle school students and staff at 70 Lomita would overwhelm an already overburdened traffic loop around Edna Maguire Elementary. The District's own environmental analysis indicates traffic congestion would significantly increase, creating unsafe conditions for walkers, cyclists, horseback riders (Horse Hill) and drivers. Parking spillover would further strain an area already struggling during Edna Maguire drop-off and pick-up.

Traffic on Lomita is already a serious issue and at times extremely dangerous for children, with congestion from the only remaining Whole Foods, the post office, the Islamic Center, the busy bike path connecting Mill Valley and Corte Madera, horses sharing the road, and the heavy traffic from Edna Maguire—adding hundreds of middle schoolers would make this corridor far too dangerous.

Safety Risks

If the district were to use the Lomita site (even temporarily), in the event of an emergency such as wildfire or any threat to the kids at school, the concentration of families and vehicles in this small residential area could create dangerous evacuation gridlock. While you have stated that staggering start times could help alleviate some traffic burden during normal operations, this would not be possible in the case of an emergency, when the need to evacuate all students and staff at once would create

gridlock and make it impossible to move people safely, putting the lives of the entire neighborhood at risk if congestion prevented residents from evacuating.

Cultural and Environmental Concerns

The Draft Environmental Impact Report highlights that the Lomita site overlays a significant Native American cultural area. Construction risks disturbing this resource, which could cause costly delays and potentially halt progress indefinitely. Unlike the current campus—which has already been studied and mitigated for such risks—the Lomita site adds uncertainty and potential legal complications.

Community Service and Financial Implications

Relocating the middle school to 70 Lomita would displace valuable community services, including West America Taekwondo and Aftercare. In addition, the costs of busing and infrastructure needed to support this site would draw heavily from the District's general fund, taking resources away from classrooms.

In contrast, the current Sycamore Drive site is larger, centrally located, environmentally vetted, and designed to accommodate long-term growth while minimizing impacts to neighborhoods and services. Renovating there is both the prudent and community-oriented choice. It is also adjacent to the Mill Valley Community Center and parks where many of the after school activities take place.

I urge you to honor the intent of Measure G voters, prioritize student and community safety, and move forward with modernization at the existing Mill Valley Middle School site.

Thank you for your consideration and for your service to our community.

Sincerely,

Patricia Kittredge

Horse Hill Resident

Responses to Patricia Kittredge Comments

The comment's concerns are noted. Please see Master Response 1, above regarding preferences of alternatives. Community and financial impacts are addressed in Master Response 2. Traffic and parking issues associated with potential alternatives involving the Edna Maguire/Terra Marin campus are described in the Alternatives chapter of the EIR and addressed in Master Response 3, above. Archeological and tribal cultural resources issues associated with the Edna Maguire/ Terra Marin site are addressed on pp. 5-12 and 13 of the EIR, which includes a mitigation measure for potential impacts to

archaeological resources. Master Response 4 addresses concerns with the alternative site's acreage.

124. Alia Al-Zand Comments

From: Alia Al-Zand <alia.alzand@gmail.com>
Date: Tue, Sep 16, 2025 at 4:17 PM
Subject: MVSD Project Impact on West America TKD & After Care
To: <Jarroyo@mvschools.org>

Dear Mr. Arroyo,

My name is Alia Al-Zand and I live in Mill Valley with my family. My children have been attending West America Tae Kwon Do for about 12 years.

I am writing to voice my opposition to the proposed moving of MVMS to the Lomita (& Edna) campus. The logistical concerns are well known: 1) increase traffic congestion in an already busy area; 2) difficulty for MVMS students to access community center benefits; 3) cost; 4) loss of a much needed soccer field; and 5) environmental impacts related to horse hill.

In addition to these important concerns, I wanted to also mention the character of this place. WATKD is an important part of Mill Valley's history and culture. WATKD has trained thousands of Mill Valley children for over 40 years, incorporating exercise, respect and leadership within their curriculum; training children to be hard working and empathic adults. This gem is well known in not only the Bay area...whenever I meet someone from Mill Valley while travelling, WATKD inevitably comes up. I always hear positive words about the sense of community it fosters and feel this community first hand.

Please consider these comments as you deliberate the merits of this project.

Kind Regards,

Alia

Responses to Alia Al-Zand Comments

Please see Master Responses 1, 2, and 3.

125. Lois Ashley Comments

From: **Lois Ashley** <loiskellyashley@gmail.com>
Date: Sat, Sep 13, 2025 at 4:10 PM
Subject: Rebuilding the middle school
To: <jarroyo@mvschools.org>

Dear Members of the Mill Valley School Board,

I strongly support rebuilding the Mill Valley middle school on the site where it currently stands. I would think the bottom floor could be raised high enough to mitigate any concerns about flooding in the future.

I feel that building a new middle school next to the Edna Maguire grade school would result in a cramped middle school with very little separate area for the middle schoolers to have
P. E. and also might cramp the Edna Maguire facility at the same time. Also, the traffic jam on Lomita and on East Blithedale with parents trying to get to Lomita would be horrendous at drop off and pick up time.

I have voted yes on every school bond that has been proposed ever since I've lived in Mill Valley for the past 43 years and will continue to do so as long as the money is used for something that makes sense to me. Thank you for taking my opinion in to consideration.

Sincerely,

Lois Ashley

Responses to Lois Ashley Comments

Please see Master Response 1. Flood hazards to the existing buildings are described in the Hydrology and Water Quality chapter of the EIR. Master Response 3 addresses traffic and congestion issues.

126. Tiiu McGuire Comments

From: **Tiiu McGuire** <tiiucm@gmail.com>
Date: Sat, Sep 13, 2025 at 11:53 AM
Subject: Opposition to location middle school!
To: <jarroyo@mvschools.org>

Dear Julio Arroyo,
As a Mill Valley taxpayer & parent I'm writing to express my strong opposition to the option of using the Lomita & Edna Maguire campus for the middle school project.
So many families depend upon West American Tae Kwon Do and the invaluable after school program.
As a single mom, the aftercare program is the only way my son would be able to participate in tae kwon do… and he does so 5 days per week.

There is a direct correlation between West American TKD & my son Liam's improved physical, mental health and social skills…and the intangible value of a vibrant community.

This is also a small business run by a highly respected family in our community & this would likely be a fatal blow to their business- which is not acceptable.

I sincerely appreciate your consideration & look forward to your response.

Tiiu McGuire

Responses to Tiiu McGuire Comments

Please see Master Response 2.

127. Zara Forzley Comments

From: **Zara Forzley** <zara.forzley@gmail.com>
Date: Sat, Sep 13, 2025 at 11:32 AM
Subject: Please Keep West America TKD in Its Home
To: <jarroyo@mvschools.org>

Dear Mill Valley School District board,

My name is Zara Forzley. I am 19 years old and have been training under West America Tae Kwon Do for 13 (almost 14 years). Training has been a vital aspect of my life teaching me physical (coordination, flexibility and strength) as well as emotional (power, self-control and determination) skills. Moreover, the dojo has reinforced indispensable life-lessons such asrespect, discipline, perspective-taking, gratitude, solidarity and enthusiasm. I have grown a great deal from the community, forming meaningful long-lasting friendships with martial artists from different generations and walks of life, people I probably wouldn't have met otherwise.These ideas and abilities have trickled down into everything I do to my novel pursuit of dance to the way I approach my academics or interact socially with others.

This is not only the result of dedication to a beautiful martial art, but a dedication to the beautiful people and place. The Lomita location, founded by Sensei Roger Carlton Sr in 1983, is essential to the Mill Valley community. As I walk through the street in my gi or tkd hoodie, from Mill Valley to San Francisco, I have often gotten comments from strangers who stop me to announce they had gone to the dojo too. Over 42 years, our teachers have fostered a caring and generous third-space, encouraging the athletic and artistic development of hundreds of students.

Displacing West America TKD would be devastating to all those who have years of memories there. It would disrupt a community we have all worked so hard to build, a community of respect so urgent in these times. I have additionally had the opportunity to work with West America Aftercare in the summer. I have seen first hand the flourishing of some of these children, even in a short period of time. Finally, the displacement would not only impact the dojo, but the Edma Maguire kids and the overall neighborhood who are not adapted to the 176.9% student body increase with the addition of MVMS. Given the communal risks, and the fact that there is simply not enough space, I find the proposed renovation of MVMS on Lomita Dr nonsensical. I implore you to consider other alternatives.

As I have written this email I struggle to translate the importance the Lomita location, and the people that populate it, have had on my life and countless lives of others. I am

sure that through collaborative thinking we can find a less destructive renovation plan, one that supports both the middle schoolers and the community as a whole.

Thanks for your time and consideration,

Zara Al-Zand Forzley

Responses to Zara Forzley Comments

Please see Master Responses 1 and 2.

128. Anne Deucher Comments

From: **Deucher, Anne** <Anne.Deucher@ucsf.edu>
Date: Sat, Sep 13, 2025 at 10:08 AM
Subject: Support for renovation of middle school at existing site
To: jarroyo@mvschools.org <jarroyo@mvschools.org>

Of the alternatives available for the Mill Valley middle school project I support renovation of the middle school at its present site. It is most financially responsible and also most environmentally conscientious.

Anne Deucher
Mill valley resident

Responses to Anne Deucher Comments

Please see Master Response 1.

129. Emmalee Schlager Comments

From: **Emma Schlager** <em.n.em272@gmail.com>
Date: Sun, Sep 21, 2025 at 6:47 PM
Subject: Please Keep West America TKD in Its Home
To: <jarroyo@mvschools.org>

Dear Mill Valley School District Board,

I am writing this to add my voice in the conversation on the importance of keeping West America Taekwondo and After Care in its current location.

I grew up in Mill Valley, originally attending Edna Maguire, Marin Primary and then Tam High. In Middle School I really wanted to begin Martial Art. I begged my parents and we agreed on joining West America Taekwondo since it was in an area that we were familiar with. Joining Taekwondo was one of the greatest decisions I made. Almost instantly West America Taekwondo became one of my favorite places and I was eager to go to classes whenever I could. Even when I went off to college, any vacation I came home for, I would return to the dojo, it was my 2nd home.

I am currently away in Georgia again for Veterinary school, an achievement I wouldn't have been able to accomplish without their support and the values they have all taught me. Even still, when I think of my community back home, I think of West America Taekwondo. The only thing keeping me away is distance, and even then, I would still like to have a home to return to. West America Taekwondo, is a supportive, inclusive and spectacular community, one who supports its members and gives so many people a place to feel connected to and help them grow into a smart, caring person capable of fantastic things. It would be a shame to displace such a valuable community and. Staple of Mill Valley.

While this was my personal experience, I know many others who share similar sentiments. Therefore, in order to keep a valuable community within Mill Valley strong, I urge you to find a solution for the Middle School renovation which would not need to displace West America Taekwondo, and the community it has helped create.

Thank you for your consideration.
Sincerely,

Emmalee Schlager

Response to Emmalee Schlager Comments

Please see Master Response 2.

130. Frances Engstrom Comments

From: Fran Engstrom <franpt123@comcast.net>
Date: Mon, Sep 22, 2025 at 12:48 PM
Subject: Proposed Middle School at 70 Lomita Drive
To: <jarroyo@mvschools.org>

Dear Mr. Arroyo,

The proposal to place the Middle School on Lomita Drive is a complete over burden and disregard for both residents of the neighborhood and for families and students coming from other neighborhoods. I live on Lomita and we already have gridlock at school times, after school extended day pick up, sports activities, the private school /activities already in place at 70 Lomita. Add to that, heavy traffic and overflow parking from the nearby Islamic Center on Shell Road.

Our road is already in disrepair, the sidewalks are inadequate, there is no bike lane on Lomita, south of Edna.

I remember that there was a short-lived experiment with buses for Edna students that did not succeed.

So, we have multiple “rush hours” already on a daily basis. I can only imagine how long the drop off and pick up times for the parents. The e bike onslaught will be scary.

My children went to MVMS at it’s current location and were not adversely affected by the266isturben at all. They adapted to the
aroma and have done quite well in life.

70 Lomita is simply not the place for another school. Repair or rebuild where it is now.

Thank you,
Frances Engstrom
110 Lomita Drive

Response to Frances Engstrom Letter

Please see Master Responses 1 and 3.

131. Nicole Palmer Comments

From: Nicole Palmer <NicolePalmer@comcast.net>
Date: Sun, Sep 21, 2025 at 3:25 PM
Subject: Measure G – Modernizing Mill Valley Middle School – Resident Feedback
To: <jarroyo@mvschools.org>

Dear Julio,

As a Mill Valley resident, I, along with many others, strongly support modernizing Mill Valley Middle School at its existing Sycamore Drive site, as voters understood and approved through Measure G. However, many of us are deeply concerned by discussions of relocating the school to 70 Lomita Drive.

Our key concerns:

- Accountability and Transparency
  - Voters were led to believe the middle school would be rebuilt at Sycamore; moving it elsewhere is misleading and undermines trust.
  - Millions have already been spent on consultants and studies, with little physical work completed.
  - Shouldn't the true soil and foundation costs have been known and understood earlier when we voted for the measure? I would like a full accounting of where Measure G funds have gone and what each vendor has been paid.

- Sycamore Site Is the Right Site
  - The existing middle school campus is centrally located, already environmentally vetted, and designed for long-term growth.
  - It is open land in the heart of the district, not pressed against residential neighborhoods.
  - Abandoning this site would leave a large, central property empty while creating chaos elsewhere.

- 70 Lomita Is the Wrong Site
  - Too Small: At only 4 acres, the site is far below Department of Education guidelines of 15–25 acres for middle schools.

- Shared Spaces: Mixing elementary and middle schoolers in fields and drop-off loops raises safety and developmental concerns.
- Cultural Resources: Portions of the property overlay a Native American burial ground, risking costly disruption.
- Traffic Congestion: Hundreds of additional cars would overwhelm an already unsafe corridor serving Edna Maguire, Whole Foods, the post office, and the bike path.
- Community Displacement: Would force out valuable services like West America Taekwondo and Aftercare.
- Financial Strain: Could require unbudgeted busing and infrastructure costs, drawing from the general fund.

We need transparency and accountability. Measure G was clear: rebuild and modernize Mill Valley Middle School at its current site, not relocate it to 70 Lomita.

- Can you please send me a full accounting of where Measure G funds have gone and what each vendor has been paid?
- And Zoom links and details for your next meetings?

Sincerely,

Nicole Palmer
4 Meadow Drive

Responses to Nicole Palmer Comments

The comment's concerns are noted. Please see Master Response 1, above regarding preferences of alternatives. Community and financial impacts are addressed in Master Response 2. Traffic and parking issues associated with potential alternatives involving the Edna Maguire/Terra Marin campus are described in the Alternatives chapter of the EIR and addressed in Master Response 3, above. Archeological and tribal cultural resources issues associated with the Edna Maguire/ Terra Marin site are addressed on pp. 5-12 and 13 of the EIR, which includes a mitigation measure for potential impacts to archaeological resources. Master Response 4 addresses concerns with the alternative site's acreage. The comment's concerns regarding shared spaces between the middle school and elementary school, and financial management issues are noted, but are not CEQA concerns.

132. Sarah Kelley Comments

From: **Sarah Kelley** <kelley.sarahc@gmail.com>
Date: Sat, Sep 20, 2025 at 8:51 PM
Subject: MVSD Modernization – Please Renovate the Existing Campus
To: <jarroyo@mvschools.org>

Hi there,

I'm a parent of two (one in TK at Edna and an upcoming toddler), and live in close proximity to Edna Maguire. I'm also the daughter of a retired school teacher and a retired city planner, so have a lot of sympathy for the pressures this administration is facing. I also have a long standing personal policy to never be a NIMBY-type, so it pains me a bit to write this note:

I've been keeping up to the extent possible on all of the middle school progress/drama to-date, and strongly urge the renovation of the existing middle school over the joint campus proposal at the Lomita/Edna site. Part of me is selfishly thinking it would be nice to have my kids in such close proximity for three extra years, but reality is, the neighborhood crowding in the mornings is already quite miserable, I can't imagine the additional load coming in. Not to mention, I imagine the strain on parents that live in other parts of the city to get up to Edna is much less central than the Sycamore campus.

We also use West America for After Care and TKD, it would be a shame to lose this community resource when I don't believe the renovation scenario would cause any displacement?

My sense is that this is the preferred route for the district anyway, I urge you to follow your instincts!

Thank you
Sarah Kelley
24 Somerset Lane, Mill Valley

Responses to Sarah Kelley Comments

Please see Master Responses 1 and 2

133. Shannon Gotham Comments

From: Shannon Gotham <gothamfs@outlook.com>
Date: Sat, Sep 20, 2025 at 12:07 PM
Subject: Proposed Middle School at 70 Lomita Drive
To: jarroyo@mvschools.org <jarroyo@mvschools.org>

To whom it may concern:

Our small residential neighborhood is already overwhelmed with traffic caused by the elementary schools here. Noise, traffic, air pollution, people dropping their trash along our streets and homes are just some of the things we have to deal with. Moving the middle school here doesn't solve a problem and makes our neighborhood suffer even further.

Renovating the current Mill Valley Middle School campus is the right thing to do for the community. It is centrally located and easily accessible by major roads, keeping traffic away from small residential streets while maintaining a safe, stable learning environment for all of our students. It is a proven, cost effective plan, on a much larger site that avoids all of the following problems.

- Traffic overload. The District's own environmental report says traffic on our small residential loop would be pushed beyond capacity, creating long backups, blocked driveways, and unsafe conditions for walkers, cyclists, and elementary families.
- Parking spillover. Existing streets already struggle during Edna Maguire pick-up and drop-off. Adding nearly 800 middle schoolers (to start), plus staff would triple enrollment density without the parking or road infrastructure to support it and cause significant parking and traffic issues throughout the day.
- Noise and air quality. We already deal with a LOT of noise from Edna Maguire! 2-3 years of demo and construction would mean constant noise, dust, and compromised air quality for neighbors and elementary students, our most sensitive age group of learners. Permanent operations would bring a significant increase in daily noise.
- Emergency and safety. In a wildfire or other disaster, more than a thousand panicked parents could flood into our small residential loop to reach their children while neighboring families are simultaneously trying to evacuate. This gridlock could block emergency vehicles and trap residents and children in harm's way.

- Cultural impact. The Draft EIR notes the site risks disturbing a significant Native American cultural area, a risk absent at the current MVMS location. Additional discoveries made during construction could cause costly delays and halt construction indefinitely.

Having a middle school in our tiny neighborhood loop will create an absolute nightmare for all of these reasons and more. This community will not support building a school in this neighborhood.

Sincerely,

Shannon Gotham

Responses to Shannon Gotham Comments

The comment's concerns are noted. Please see Master Response 1, above regarding preferences of alternatives. Traffic and parking issues associated with potential alternatives involving the Edna Maguire/Terra Marin campus are described in the Alternatives chapter of the EIR and addressed in Master Response 3, above. Noise and Air Quality issues associated with alternatives using the Edna Maguire/Terra Marin site also are addressed in Chapter 5 of the EIR.

As with the MVMS Replacement Campus Project, **Mitigation Measure 3.2-1 through 3.2-8** would also be required to reduce fugitive dust and combustion emission impacts for the Edna Maguire Alternatives. These mitigation measures would likely reduce air quality impacts for students/staff at the existing elementary school and nearby residence to **less than significant**. Although the air quality impacts at nearby residence associated with Edna Maguire Alternatives may be higher than the air quality impacts at nearby residence associated with the MVMS Replacement Campus Project, it would be expected to be **less than significant with mitigation measures.**

Temporary construction noise impacts from the Edna Maguire Alternatives would likely result in a **significant and unavoidable impact** to students and staff at the Edna Maguire campus (similar to the MVMS Replacement Campus Project).

Temporary construction noise impacts from the Edna Maguire Alternatives would likely result in a **significant and unavoidable impact** to nearby noise-sensitive receptors (compared to a **less than significant impact** for the MVMS Replacement Campus Project). This is because the noise-sensitive receptors along Lomita Drive would be much closer to the construction activities occurring at the Edna Maguire campus

compared to the noise-sensitive receptors nearby the MVMS Replacement Campus Project.

For the two previous noise impacts, **Mitigation Measures 3.9-1, 3.9-3, and 3.9-4** would be applicable to construction activities for the Edna Maguire Alternatives. However, any type of construction noise barrier (as detailed in **Mitigation Measure 3.9-2**) would not be feasible due to potential circulation and vehicle access issues at the Edna Maguire campus.

The increase in traffic noise levels at noise-sensitive receptors nearby the Edna Maguire campus would likely result in a **significant and unavoidable impact** to nearby noise-sensitive receptors (compared to a **less than significant impact** for the MVMS Replacement Campus Project). This is because Lomita Drive (a two-lane road) would be the main road used to access the school and the Edna Maguire Alternatives would likely result in a significant increase in vehicle trips on this roadway. In addition, noise-sensitive receptors along Lomita Drive would be closer to traffic noise compared to the noise-sensitive receptors nearby the MVMS Replacement Campus Project access roadways. There would be no feasible mitigation measures to reduce traffic noise level increases for the Edna Maguire Alternatives.

Thus, the Edna Maguire Alternatives would likely result in greater construction noise and traffic noise impacts compared to the MVMS Replacement Campus Project.

Archeological and tribal cultural resources issues associated with the Edna Maguire/Terra Marin site are addressed on pp. 5-12 and 13 of the EIR, which includes a mitigation measure for potential impacts to archaeological resources.

134. Timothy Lema Comments

From: **Timothy Lemma** <tim@lemmaconstruction.com>
Date: Sat, Sep 20, 2025 at 11:36 AM
Subject: Proposed Middle School at 70 Lomita Drive
To: jarroyo@mvschools.org <jarroyo@mvschools.org>

Our small residential neighborhood is already overwhelmed with traffic caused by the elementary schools here. Noise, traffic, air pollution, people dropping their trash along our streets and homes are just some of the things we have to deal with. Moving the middle school here doesn't solve a problem and makes our neighborhood suffer even further. As a General Contractor I can guarantee that this will have a terrible and lasting impact on this tiny neighborhood. If you think it is such a great idea why don't you think about what it would be like to do this next to your own house.

Renovating the current Mill Valley Middle School campus is the right thing to do for the community. It is centrally located and easily accessible by major roads, keeping traffic away from small residential streets while maintaining a safe, stable learning environment for all of our students. It is a proven, cost effective plan, on a much larger site that avoids all of the following problems.

- Traffic overload! The District's own environmental report says traffic on our small residential loop would be pushed beyond capacity, creating long backups, blocked driveways, and unsafe conditions for walkers, cyclists, and elementary families.
- Parking spillover! Existing streets already struggle during Edna Maguire pick-up and drop-off. Adding nearly 800 middle schoolers (to start), plus staff would triple enrollment density without the parking or road infrastructure to support it and cause significant parking and traffic issues throughout the day.
- Noise and air quality! We already deal with a LOT of noise from Edna Maguire! 2-3 years of demo and construction would mean constant noise, dust, and compromised air quality for neighbors and elementary students, our most sensitive age group of learners. Permanent operations would bring a significant increase in daily noise.
- Emergency and safety! In a wildfire or other disaster, more than a thousand panicked parents could flood into our small residential loop to reach their children while neighboring families are simultaneously trying to evacuate. This gridlock could block emergency vehicles and trap residents and children in harm's way.

- Cultural impact! The Draft EIR notes the site risks disturbing a significant Native American cultural area, a risk absent at the current MVMS location. Additional discoveries made during construction could cause costly delays and halt construction indefinitely.

Having a middle school in our tiny neighborhood loop will create an absolute nightmare for all of these reasons and more. The community will not support this idea.
--
Tim Lemma
Owner
Lemma Construction Incorporated

Responses to Timothy Lema Comments

The comment's concerns are noted. Please see Master Response 1, above regarding preferences of alternatives. Traffic and parking issues associated with potential alternatives involving the Edna Maguire/Terra Marin campus are described in the Alternatives chapter of the EIR and addressed in Master Response 3, above. Noise and Air Quality issues associated with alternatives using the Edna Maguire/Terra Marin site also are addressed in Chapter 5 of the EIR.

As with the MVMS Replacement Campus Project, **Mitigation Measure 3.2-1 through 3.2-8** would also be required to reduce fugitive dust and combustion emission impacts for the Edna Maguire Alternatives. These mitigation measures would likely reduce air quality impacts for students/staff at the existing elementary school and nearby residence to **less than significant**. Although the air quality impacts at nearby residence associated with Edna Maguire Alternatives may be higher than the air quality impacts at nearby residence associated with the MVMS Replacement Campus Project, it would be expected to be **less than significant with mitigation measures.**

Temporary construction noise impacts from the Edna Maguire Alternatives would likely result in a **significant and unavoidable impact** to students and staff at the Edna Maguire campus (similar to the MVMS Replacement Campus Project).

Temporary construction noise impacts from the Edna Maguire Alternatives would likely result in a **significant and unavoidable impact** to nearby noise-sensitive receptors (compared to a **less than significant impact** for the MVMS Replacement Campus Project). This is because the noise-sensitive receptors along Lomita Drive would be much closer to the construction activities occurring at the Edna Maguire campus

compared to the noise-sensitive receptors nearby the MVMS Replacement Campus Project.

For the two previous noise impacts, **Mitigation Measures 3.9-1, 3.9-3, and 3.9-4** would be applicable to construction activities for the Edna Maguire Alternatives. However, any type of construction noise barrier (as detailed in **Mitigation Measure 3.9-2**) would not be feasible due to potential circulation and vehicle access issues at the Edna Maguire campus.

The increase in traffic noise levels at noise-sensitive receptors nearby the Edna Maguire campus would likely result in a **significant and unavoidable impact** to nearby noise-sensitive receptors (compared to a **less than significant impact** for the MVMS Replacement Campus Project). This is because Lomita Drive (a two-lane road) would be the main road used to access the school and the Edna Maguire Alternatives would likely result in a significant increase in vehicle trips on this roadway. In addition, noise-sensitive receptors along Lomita Drive would be closer to traffic noise compared to the noise-sensitive receptors nearby the MVMS Replacement Campus Project access roadways. There would be no feasible mitigation measures to reduce traffic noise level increases for the Edna Maguire Alternatives.

Thus, the Edna Maguire Alternatives would likely result in greater construction noise and traffic noise impacts compared to the MVMS Replacement Campus Project.

Archeological and tribal cultural resources issues associated with the Edna Maguire/ Terra Marin site are addressed on pp. 5-12 and 13 of the EIR, which includes a mitigation measure for potential impacts to archaeological resources.

135. Maralee Burgard and Ernie Lafky Comments

From: **Maralee Burgard** <mburgard@gmail.com>
Date: Tue, Sep 23, 2025 at 2:54 PM
Subject: MVMS – Parent Response to the EIR – Relocate Permanently
To: <jarroyo@mvschools.org>

Hello,

My daughter is a current eighth grade student at MVMS.

After two years of my daughter having headaches and also vomiting on days when the sewage smells are blowing directly across the street into the school, it is incredulous that the district is not adamant about correcting a massive mistake made years ago: locating the middle school away from the sewage plant. Why is this not front and center? There should not be any school next to a sewage plant. Period.

Tear down the middle school and add onto the rec center – all enclosed, of course. Move the middle school to the Terra Marin campus and figure the rest out from there.

Kind regards,

Maralee Burgard

Ernie Lafky

412 Throckmorton Ave, Mill Valley, CA 94941

Responses to Maralee Burgard and Ernie Lafky Comments

Please see Master Response 1. Odors at the existing MVMS are described and addressed in the Air Quality chapter of the EIR.

136. Bill Ryder Comments

From: **Bill** <bryder61@gmail.com>
Date: Tue, Sep 23, 2025 at 7:47 AM
Subject: Public Comment on Mill Valley Middle School Modernization Draft EIR
To: <jarroyo@mvschools.org>

Dear Julio,

I am a former Mill Valley School District parent commenting on the Mill Valley Middle School Modernization Draft EIR. I support renovating the existing middle school building rather than building new facilities at 70 Lomita.
Key Concerns with 70 Lomita:

Traffic & Parking: Building at 70 Lomita would flood Lomita Drive with excessive traffic, burdening surrounding neighborhoods. The site lacks sufficient parking for the population increase from 500 to 1,350 students/staff, especially with plans to remove 43 existing parking spaces.

Site Inadequacy: At only 4 acres, 70 Lomita cannot adequately house a middle school compared to the current 14-acre site. Elementary and middle schoolers would be forced to share play spaces and gyms, which is developmentally inappropriate.

Community Disruption: Edna Maguire was just renovated in 2014 and shouldn't face another major disruption. The beloved taekwondo studio and aftercare program would be displaced, removing an important community resource families rely on.

Educational Impact: Middle schoolers should remain together in one location to build community before high school, not be split between sites.

Benefits of Renovation:
1. The EIR confirms renovation with on-site portables is safe
2. New HVAC systems can address any odor concerns
3. Maintains central location supporting walking/biking to school
4. Leverages the most appropriate site size per state guidelines

Please include these comments in the Draft EIR under my name.

Thank you,
Bill Ryder

Responses to Bill Ryder Comments

Please see Master Responses 1-4.

137. Pamela Keon Comments

From: **PAMELA KEON** <keonvitale@aol.com>
Date: Mon, Sep 22, 2025 at 10:59 PM
Subject: MVMS Draft EIR
To: <jarroyo@mvschools.org>

To Whom It May Concern:

I've been a Mill Valley resident for almost 50 years, and currently live in unincorporated 94941. I am writing to comment on the MVMS Draft EIR.

Recognizing that MVSD is faced with difficult choices, the option to co-locate a new middle school campus with the current Edna Maguire elementary school campus raises significant concerns about the impact of traffic on the Alto neighborhood as well as the resulting traffic concerns that would ripple across Mill Valley.

Mill Valley's population is forced to navigate streets that were originally constructed to serve a much smaller community, with no options to add roads. Not only was the community for which the roads were designed smaller, but the culture was different. Children were expected to walk to wherever they needed to go, and families often had only one car or none at all. When I moved to Mill Valley, the school district used school buses to transport those children who lived too far to walk to school and families that drove children to school did so in carpools that had multiple children in any car.

In 1952, when MVSD opened Alto School at 70 Lomita Drive to 7th and 8th graders, and in 1956, when Edna Maguire School at 80 Lomita opened to 7th and 8th graders and Alto School became an elementary school, the Alto neighborhood had not yet been fully developed, and it would be another 20 years before the current Alto Plaza Shopping Center, home to Whole Foods and the Mill Valley Post Office, would be developed. Today's Lomita was not open to cars, and students either walked along the train tracks – today's Multi—Use Path, or took the school bus which accessed the neighborhood from Tower Drive. The shopping center, a vibrant hub of activity today, only became so in 2010, when Whole Foods opened in that location. Prior to that, empty storefronts were the norm, depending on whether there was a viable grocery store operating there at any given time, and there were usually more empty parking spots than cars in the lot.

Today's situation is very different from when the current Edna Maguire and Alto,

sometimes referred to as Terra Marin, campuses were established. The Alto Shopping Center is not only quite busy, but generates a great deal of traffic that is not optimally served by the existing entrances and exits, with the majority of inbound and outbound traffic using Lomita Drive to access or exit the center. Our local traffic culture is also quite different, and has been influenced by many factors. Among those are personal choices, such as widespread offsite afterschool activities that require parents to pick their children up at the end of the school day and drive them to another location.

Traffic has also been influenced by the school district's 1980's decisions to eliminate school buses and to close Marin Terrace and Homestead Schools, as well as the early 1990's decision to no longer guarantee that a child can go to his or her local school. The closure of two campuses has forced children to travel further to school, in some cases attending campuses that never anticipated any vehicular traffic. The decision to eliminate guaranteed attendance at a child's "neighborhood" school also forces children into cars, and in some cases results in situations where the cars must pass by the closest campus to the homes of these children in order to go to a much more distant school. One example of this occurs in Tam Valley, where children get assigned to attend school at Strawberry, 4.5 miles away and across the freeway, creating long commutes and adding to traffic.

Each of the above MVSD decisions made a generation ago, may have seemed benign at the time and in isolation, yet when considered in hindsight and collectively, the negative impact is inarguable. It is imperative that, in analyzing the options and very challenging decision regarding the future of the Mill Valley Middle School campus, the District ensure that its impact on our community of approximately 30,000 receives the consideration it deserves.

Should MVSD conclude that it is forced to co-locate Edna Maguire Elementary School and Mill Valley Middle School at 70 and 80 Lomita Drive, alternative modes of transportation will be essential. Forcing the Alto neighborhood to endure 1,000 cars or more coming up and down Lomita Drive each school day is unacceptable and likely not realistically managed by our current infrastructure. MVSD should integrate the cost of school buses to any plan to co-locate the Middle School in this neighborhood, and a robust and sustained campaign to get children out of private cars would need to be implemented. A school bus program would need to include enough "stops" to make it easy for children to walk to and from their bus stops, and be located in areas that offer any parent or caregiver who drives to meet the bus a safe place to park. Pre-COVID pilot programs for subsidized bus programs that made very few stops were not successful. A fully funded bus program with practical routes that is accessible to every

MVSD student needs to be a component of any co-location of campuses.

The Alto neighborhood should not have to carry the burden for the rest of 94941 of poor planning decisions made a generation ago. Significant mitigation of the impact of any decision to co-locate the Middle School with Edna Maguire elementary school must be one of the highest priorities. Again, there is no question that MVSD faces a difficult situation with few attractive solutions. Nevertheless, unfair burdening of any one neighborhood needs to be avoided at all costs.

Thank you for your consideration,

Pam Keon

Responses to Pamela Keon Comments

Please see Master Responses 1 and 3, above. The alternatives involving locating the middle school at the Edna Maguire/Terra Marin campus would include a bus service, as suggested in the comment and as referenced in the analysis of Alternatives within the EIR.

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138. Pierce Bruxton Comments

From: **Pierce Buxton** <piercebuxton@gmail.com>
Date: Mon, Sep 22, 2025 at 10:14 PM
Subject: Recommend 282isturbed282 the MVMS in place
To: <jarroyo@mvschools.org>

Hi Julio,

I'm a Mill Valley resident at 1 Upperhill Rd in Scott Valley. My two kids go to Edna in TK and 1st grade. I've been following the discussions regarding where the new middle school should be located. I support the general consensus that you should renovate in place for the many reasons stated before including:l traffic issues across the city, but especially in the Alto area, parking, not enough space, middle school kids being too close to elementary school kids, and so on.

One additional issue that I hadn't heard brought up is if you close down the two aftercare facilities West America and Bright Horizons, you'll incur even more traffic at the end of the school day: The current Edna traffic, the new middle school traffic, and the additional traffic to take kids to another off-site day care.

Another concern I have is that I'd like to make sure that our kids can continue to go to the Edna facility for their entire elementary school experience. We moved to this neighborhood for the schools, and Edna in particular. We would be gutted if the middle school kids took over Edna and the elementary kids had to go to another facility during the renovation.

Hopefully you can find a solution where you renovate the MVMS in place, and are able to support the kids nearby the current site during the renovation to minimize disruption for everyone involved.

Thank You,

Pierce Buxton

1 Upperhill Rd

Mill Valley, CA 94941

Responses to Pierce Bruxton Comments

Please see Master Responses 1, 2, and 3. Bright Horizons would not be displaced by any of the project alternatives.

139. Bria Martin Comments

From: **Bria Martin** <bria@martin-tribe.com>
Date: Sat, Sep 20, 2025 at 7:14 AM
Subject: MVMS Plan – please break ground on 5/2026 at current location and keep kids together
To: jarroyo@mvschools.org <jarroyo@mvschools.org>

hello,

I am a mom of a 4th grader and 5th grader at Strawberry point and my family and I are Urging our community to break ground on 6/2026 for a new middle school renovation at the 14-acre current location. We'd like the temp portables to keep 6-8th together at the current site during renovation.

Each year of delay the budget is reduced by close to $10M and the scope and viability of the project is jeopardized.

We are grateful for the funds approved by voters to ensure students of Mill Valley for the next 50+ years have an updated Middle School to learn and thrive.

In speaking with many other parents at MVSD elementary schools and MVMS this seems like the most popular option.

We trust the process to ensure safety of our students and trust our district leaders and school board to make the best decisions for our community and use the bond funds wisely — adapting as information comes up.

Thank you,

Bria Martin

Bria Martin Comments

Please see Master Response 1.

140. Tanya Yatsuneko Comments

From: **Tanya Yatsunenko** <tyatsun@gmail.com>
Date: Fri, Sep 19, 2025 at 3:31 PM
Subject: Comment on MVMS: option #2 is the best
To: <jarroyo@mvschools.org>

Hello Dear Mr. Arroyo,

I'd like to voice an opinion in support of the option #2 on constructing a school next to Edna McGuire. The current site is not acceptable due to its location in the flood zone, and abominable smell from the wastewater treatment plant.

The report stated that the odor is "annoying" – but it's more than annoying. How can a child focus on studying (especially if it's in a trailer) in a stinky environment?

It's not simply annoying, but dangerous.

Please consider Edna McGuire site and do the right and responsible thing – there's a big space not used for anything currently.

Thank you.

Tanya

Responses to Tanya Yatsuneko Comments

Please see Master Response 1. The comment's concerns regarding odors at the MVMS site are acknowledged. Odor issues are addressed in the Air Quality chapter of the EIR.

141. Sarah Macdonald Comments

From: **Sarah McDonald** <sarahmcbru@gmail.com>
Date: Fri, Sep 19, 2025 at 3:21 PM
Subject: MVMS renovation – we are in support!
To: <jarroyo@mvschools.org>
Hi Julio.
I'm writing in support of the renovation of MVMS. My family would urge the school board (and our district leaders) to break ground on the new middle school renovation at the current location as soon as possible. We understand it will be possible to house the 6-8th graders in temporary portables on site during the renovation in order to keep those classes together. We support this.

Each week/month/year of delay on this project impacts the scope and viability of the project so we would urge the school board to break ground on this renovation promptly. We are so grateful to the voters of Mill Valley who approved the bond for this renovation to ensure students of Mill Valley for the next 50+ years can learn and thrive in an updated middle school.

We trust our district leaders and school board to make the best decisions for our community and use the bond funds wisely. Thank you so much to the school board for their unwavering leadership on this project. We support YOU.

Best, Sarah and Geoff McDonald
Strawberry Point School parents

Responses to Sarah Macdonald Comments

Please see Master Response 1.

142. Jessica Neil Comments

From: **Jessica Neil** <jessharris1@gmail.com>
Date: Wed, Sep 24, 2025 at 9:36 PM
Subject: Please renovate MVMS
To: <jarroyo@mvschools.org>
Hi,
I am a parent in the school district, and I have three children who will be future students at MVMS. I would strongly prefer for the school to stay in its current central location. Please let me know if there's anything else I can do to advocate for this outcome!

Thank you,
Jessica Neil

Response to Jessica Neil Comments

Please see Master Response 1.

143. Roger Carlon Comments

From: Roger Carlon <rcarlon111@gmail.com>
Date: Wed, Sep 24, 2025 at 6:06 PM
Subject: Comments for MVMS Renovation Project
To: <jarroyo@mvschools.org>

Hi, my name is Roger, I am a Teacher. And co-owner of both West America taekwondo and West America aftercare located on the Lomita Edna campus.

I have a few issues to bring up in regards to being in opposition of modernizing MVMS at the Edna Lomita campus.

One of such concerns is the severe traffic congestion in this area.

Anyone who's been down Lomita knows how scarce and narrow the roadway is, even not at peak traffic congestion hours. It's already busy enough with children, animals, and blind inclines. Entry and exit routes at this site, being as limited as they already are, and adding any further congestion could delay critical response times in the event of medical emergencies, natural disaster, fires, or any emergency responders response times.

Adding a middle school, with its significant increase in student population, would intensify an already problematic situation.

Equally concerning is the geographic imbalance this would create. Locating the middle school at Edna/Lomita, which sits at the far edge of Mill Valley rather than in a central location, would make access significantly more difficult for families. I would argue burdening families with additional commuting challenges for both education and extracurricular activities isn't very favorable.

Lastly, as far as construction concerns go, we've been open and running when reconstruction of Edna McGuire was ongoing less than 10 feet from our doorstep. In my emailed comment, I will attach photo proof.

Edna was open, redwood has been open, San Rafael high, which has had the biggest reconstruction, a giant gym complex and a pool amongst other things, and all have been open and none have ever had to relocate as a result of reconstruction.

Moving students AND going under construction are both disruptive, why compound these issues.














OVERA





Responses to Roger Carlon Comments

The construction disruption and displacement concerns regarding Edna Maguire/Terra Marin site project alternatives, expressed in the comment are acknowledged. Please see Master Responses 1, 2, and 3.

144. Katy Sheppard Comments

From: **Katy Sheppard** <pearcesheppard@gmail.com>
Date: Fri, Sep 12, 2025 at 12:10 PM
Subject: MV Middle School
To: Julio Arroyo <jarroyo@mvschools.org>

Hi Julio,

We've met several times as I am the parent that has helped with the Old Mill landscaping. Between the Terra Marin and current middle school sites I would prefer Terra Marin. With rising sea levels and the continued smell of the treatment plant next door, it would be great to have the new school be part of a new, beautiful complex over at Edna.

That said, I just want something to happen. I am fine with strong leadership that actually makes the project happen, and am worried that all this infighting will tank the project and we will have wasted a bunch of money on nothing. Thank you for your work on this project.

Best,

Katy Sheppard

Response to Katy Sheppard Comments

Please see Master Response 1.

145. Alice Stolte Comments

From: **Alice Stolte** <alicepwu@gmail.com>
Date: Fri, Sep 26, 2025 at 11:44 AM
Subject: Support for Relocating MVMS to the Terra Marin Campus
To: <jarroyo@mvschools.org>

Dear Mill Valley leaders and MVSD Board,

I am writing as a Mill Valley parent to strongly support relocating Mill Valley Middle School from its current site to the unused Terra Marin campus.

As you know, MVMS sits on a former city burn dump, which raises environmental concerns such as lead in the soil and methane gas. On top of that, its proximity to the Sewerage Agency of Southern Marin plant subjects students and staff to frequent sewage odors that impact the learning environment. These are not conditions we should ask our children or educators to endure.

Moving to the Terra Marin site provides a healthier, safer, and more suitable environment. It is a proactive step that avoids prolonged exposure to known risks and offers a timely, more cost-effective solution compared to complex remediation at the current campus.

I urge you to prioritize student and staff health by advancing a plan to relocate MVMS to Terra Marin. Thank you for your leadership and for keeping the well-being of our community at the forefront of this decision.

Sincerely,

Alice Stolte
Mill Valley

Response to Alice Stolte Comments

Please see Master Response 1.

146. Lochlan McHale Comments

From: **Lochlan McHale** <loch@lochlanmchale.com>
Date: Mon, Sep 29, 2025 at 1:33 PM
Subject: Please Keep West America TKD in Its Home
To: <jarroyo@mvschools.org>

Dear Mill Valley School District Board,

I strongly urge you not to displace West America TKD & After Care from its Lomita Dr. location. For 42 years, this dojo has been more than a building—it's been a safe, supportive community where children and families learn discipline, confidence, and respect.

This organization is a pillar in the community. If you walk into their space and look at all the black belts you will see the decades of investments they have made in building better humans in our community. I have volunteer coached at a local high school for a decade. In this time I have had several wrestlers who came through West America. Ironically these individuals were most of my best student-athletes. They teach life skills that are not taught by other local services. I am happy my daughter has opted to learn from this amazing resource in our community.

Losing this space would disrupt a legacy that has shaped generations. Please find a solution that allows the middle school renovation to move forward without forcing West America from the home it has built with this community.

Thank you for your consideration.
Sincerely,

- Lochlan

loch@lochlanmchale.com

Responses to Lochlan McHale Comments

Please see Master Responses 1 and 2.

147. Barbara Strick Comments

From: **Barbara Strick** <barbstrick@gmail.com>
Date: Mon, Sep 29, 2025 at 3:50 PM
Subject: Proposed middle school
To: <jarroyo@mvschools.org>

Dear Mr. Arroyo,

I'm writing to you as a 41 year resident of 91 Lomita Drive in Mill Valley. I am deeply concerned about the prospect of rebuilding/moving the Middle School to Lomita Dr.

Several years ago, our neighborhood suffered through the remodel of Edna McGuire school. During that period, which lasted a very long time, the disruption was overwhelming for many neighbors. The amount of dirt and dust in the air was a health hazard. One neighbor needed an emergency room visit due to the pollution. Despite repeated assurances that every precaution was being taken to keep the dust and dirt controlled, it was never done. The construction trucks arrived before dawn, parked in front of our homes, and kept their engines running. The noise and pollution kept many of us awake. Our homes and cars were constantly covered in dust and dirt.

But the biggest issue is that our narrow roads simply cannot handle that level of traffic congestion during construction and will certainly not be able to handle the daily dropoff/pickup of middle school students. The amount of traffic generated from Edna McGuire already prohibits me from entering/exiting my driveway during those hours. We already have the largest elementary school in MV in our neighborhood. Tripling the amount of cars would truly be a nightmare.

Lomita Drive is simply not equipped to handle that massive increase in traffic.

Additionally, there are the safety issues. There is no way any emergency vehicle would be able to navigate our streets should there be a fire or health emergency.

I urge you to make the right decision to renovate the school at it's present location

Sincerely,
Barbara Strick

Responses to Barbara Strick Comments

Please see Master Response 3.

148. Greg Moreau Comments

From: Greg Moreau <gregorymoreau@gmail.com>
Date: September 27, 2025 at 8:37:23 AM PDT
To: LetterstotheBoardofTrustees@mvschools.org
Cc: Greg Moreau <gregorymoreau@gmail.com>
Subject: MVMS Proposal Feedback

Hello,

I am a resident of the Alto neighborhood in Mill Valley and the parent of three school-age children. I am writing to express my objection to the proposal to relocate Mill Valley Middle School (MVMS) to the current site of Terra Marin School on Lomita Drive.

The proposal to move the school, either temporarily or permanently, is absurd and poorly thought out. Adding over 800 students, plus faculty, staff, visitors, and more, to the small neighborhood would be a major disruption for Alto.

The neighborhood is not set up to support the amount of traffic this would bring. The morning and afternoon drop-off and pick-up from Edna Maguire already causes a major backup of traffic, specifically on Lomita, Ashford, and Meadow Drive. Adding a middle school to the neighborhood would add huge problems to an already existing traffic issue. I cannot get out of my driveway between 2:30 – 3:15pm most Fridays due to the backup of traffic. The current plan would include Edna Maguire losing some of its current parking and drop off/ pick up space. The current space is already tight and losing it would cause a parking disruption all throughout the neighborhood.

The number of disruptive middle schoolers who will descend to the neighborhood each day will be untenable. I say this with love as I have a child in middle school, and more to go through middle school. I fear the amount of trash this will add to the neighborhood as there are no public trash cans, except a very few for dog waste. Will the city increase the sanitation and clean up in the neighborhood if there are over 800 additional 11 – 14 year olds walking around the neighborhood and bike path? Will there be any repercussions for students who are disrespectful to Horse Hill, and any extra security for the horses that live there? How will it be handled if these students walk around the Edna Maguire campus? Will any security be added to Edna's campus to ensure the 5 – 11-year-olds are not being disrupted by middle schoolers? In addition, there is a preschool on site as well. What will the school district do to ensure the safety of preschoolers against the disruption of over 800 middle school students?

The area where it is proposed to house the students is a cellular dead zone. How will the city and school support the cellular and wifi needs of all these students, and of the school without disrupting service for those who live in the neighborhood and work from home and need a guarantee of reliable wifi and cellular service?

How will the city manage the issue of the land being recognized by the Miwok Coastal tribe as a significant Native American archaeological site? Will the land be properly handled with the respect required and owed to the tribe?

With the proposal of moving the Middle School, it would cause West America Taekwondo to have to move from its current home. This is a family-run, local business that supports an afterschool program for Edna Maguire students, and has been part of the Mill Valley community for decades. It would be a great loss for the full community if America West is no longer an available resource for the community. In addition, what after-care will be put in place to continue to support the children and families who rely on America West TKD? Bright Horizons has limited space for students and is very costly.

I believe there is a proposal for the elementary school and middle school to share playing fields and gymnasium space. That fact alone explains why this plan has not been well thought out. There is not enough physical space to support the moving of part or all of MVMS to 70 Lomita Drive.

The current site of MVMS is large enough to support the school and its renovation needs. I understand parents do not want a school next to a sewer plant, but the Alto neighborhood cannot bear the brunt of a bad idea by a small and vocal group due to poor city planning many years ago.

I urge the Board to stop wasting funds, to move forward and honor the commitment of Measure G as it was passed by local citizens

Respectfully,

Greg

Response to Greg Moreau Comments

Please see Master Response 1, 2, and 3. Consultation with the tribes are ongoing with respect to both potential school sites. Cellular service and potential littering are not CEQA environmental issues. The schools would have normal security services as provided to all schools in the District.

149. Jill Bartok Comments

From: **Jill Bartok** <jdebarto@gmail.com>
Date: Fri, Sep 26, 2025 at 8:13 PM
Subject: Comments on MVSD modernization
To: <jarroyo@mvschools.org>
Cc: Dave Steiner <dfsteiner@gmail.com>

Hello,

I am in full support of the plans and research completed for moving forward on renovating the current MVSD site.

Thank you,
Jill de Bartok

Responses to Jill Bartok Comments

Please see Master Response 1.

150. Christina Meuller Comments

From: **Christina Mueller** <cmw@christinamueller.com>
Date: Tue, Sep 30, 2025 at 1:29 PM
Subject: about putting the Middle School next to Edna...
To: jarroyo@mvschools.org <jarroyo@mvschools.org>
Cc: Stefan Welter <stefan@welterventures.com>

Julio,

I am a former MVMS mom and PTA member and current Tam mom and Alto/Horse Hill resident. I strongly oppose putting a permanent middle school on the campus next to Edna Maguire Elementary School.

The traffic load in the neighborhood is already overwhelming — and was even more so when Edna was at peak enrollment of over 750 kids. There are — and were – lines of cars down the block all day to drop-off, pick-up and manage on-site activities. Cars would park for blocks when activities happened at school, overwhelming the neighborhood. Parking was impossible for my neighbors. And forget it during Ramadan when the local Muslim Center hosts non-stop events for a month, overlapping with the school. You could not find a space anywhere close to school.

A better solution already exists — renovating the current middle school campus. The site is much larger and thus better suited to a citywide school. Plus, it is centrally located, keeping traffic out of the neighborhoods and accessible by major roads.

Please keep Alto community streets safe by rebuilding the middle school at the current site. Renovating at the current site is the best option not just for Alto but for all of Mill Valley.

Cheers,

Christina

Responses to Christina Meuller Comments

Please see Master Responses 1 and 3.

151. Aaron Pribble Comments

From: Aaron Pribble <aaron.pribble@gmail.com>
Date: Fri, Sep 26, 2025 at 3:52 PM
Subject: Let's Build!
To: <jarroyo@mvschools.org>
Cc: Michelle Paitich <mpaitich@gmail.com>

Hello,

My wife Michelle and I really feel like the district has done its due diligence and it's time to rebuild the middle school at its current location. The time has come! Let's not waste more taxpayer money on consultants and lawyers. Let's save the money for the kids.

Thanks,
Aaron

Response to Aaron Pribble Comments

Please see Master Response 1.

152. Ben Zelazny Comments

From: **Ben Zelazny** <bzelazny@mac.com>
Date: Wed, Sep 24, 2025 at 5:03 PM
Subject: Re: PLEASE Proceed With Renovating the Current Middle School Campus!
To: <jarroyo@mvschools.org>
Cc: Justine Descollonges <justine@hdsf.com>

Julio,

Further to my email below, I'm a Mill Valley School District parent commenting on the Mill Valley Middle School Modernization Draft EIR. I support renovating the existing middle school building rather than building new facilities at 70 Lomita.

Key Concerns with 70 Lomita:

Traffic & Parking: Building at 70 Lomita would flood Lomita Drive with excessive traffic, burdening surrounding neighborhoods. The site lacks sufficient parking for the population increase from 500 to 1,350 students/staff, especially with plans to remove 43 existing parking spaces.

Site Inadequacy: At only 4 acres, 70 Lomita cannot adequately house a middle school compared to the current 14-acre site. Elementary and middle schoolers would be forced to share play spaces and gyms, which is developmentally inappropriate.

Community Disruption: Edna Maguire was just renovated in 2014 and shouldn't face another major disruption. The beloved taekwondo studio and aftercare program would be displaced, removing an important community resource families rely on.

Educational Impact: Middle schoolers should remain together in one location to build community before high school, not be split between sites.

Benefits of Renovation:

- The EIR confirms renovation with on-site portables is safe
- New HVAC systems can address any odor concerns
- Maintains central location supporting walking/biking to school
- Leverages the most appropriate site size per state guidelines

Please include these comments in the Draft EIR under my name.

Thank you and best regards,

Ben A Zelazny

Responses to Ben Zelazny Comments

Please see Master Responses 1, 3, and 4.

153. Matthew Walker Comments

From: **Matthew Walker** <matthew.m.walker@gmail.com>
Date: Sat, Sep 13, 2025 at 9:18 AM
Subject: Support for West America Tae Kwon Do
To: jarroyo@mvschools.org <jarroyo@mvschools.org>

Dear Mr. Arroyo,
I'm writing to inform you that I stand strongly in opposition to the proposed relocation of West America Tae Kwon Do (WATKD). WATKD not only played a central role in helping my daughter Liv develop key life skills like critical thinking, teamwork, respect, confidence, and kindness, it provided a framework for success in key parts of her life and a family for her away from home where she felt supported – one in which she flourished and which helped her become someone who wants to give back to the public and the Mill Valley Community. She continues as a high school senior to volunteer at the Mill Valley Library. The ability for her (and generations of students moving forward) to go directly to the dojo after school was and is terrific, and as a hard-working single parent, I felt secure knowing Chantal and Roger and Sensei always made and continue to make her and all of their students feel safe in a nurturing environment.

At a time when this country desperately needs citizens with the ability and the training to think independently, stand up for what is right, and to build bridges, Chantal and Roger train students to develop the skills they need to support honesty, equality, fairness, and sticking up for those who may not be able to – or feel safe to – speak up for themselves without fear or retribution.

On top of my feelings about West America, I think this is terrible site selection by the school district, but mostly, I care about preserving WATKD's ability to positively influence the youth of Mill Valley for years to come.

Matthew Walker

Responses to Matthew Walker Comments

Please see Master Responses 1 and 2.

154. Shaterra Davis Comments

From: **Shaterra Davis** <shaterradavis@yahoo.com>
Date: Fri, Sep 12, 2025 at 7:26 PM
Subject: Comment on EIR
To: jarroyo@mvschools.org <jarroyo@mvschools.org>

Dear Mill Valley School District Board,

I strongly urge you not to displace West America TKD & After Care from its Lomita Dr. location. For 42 years, this dojo has been more than a building—it's been a safe, supportive community where children and families learn discipline, confidence, and respect.

Losing this space would disrupt a legacy that has shaped generations. Please find a solution that allows the middle school renovation to move forward without forcing West America from the home it has built with this community.

Thank you for your consideration.

Sincerely,

Shaterra Davis

Responses to Shaterra Davis Comments

Please see Master Response 2.

155. Shonquis Moreno Comments

From: **shonquis** <shonquis@gmail.com>
Date: Fri, Sep 12, 2025 at 5:54 PM
Subject: Please keep the MVMS campus where it is
To: <jarroyo@mvschools.org>, <letterstotheboardoftrustees@mvschools.org>, <ekaufman@mvschools.org>, eabdoli@mvschools.org <eabdoli@mvschools.org>, nkatz@mvschools.org<nkatz@mvschools.org>, snakatani@mvschools.org <snakatani@mvschools.org>, yyoo@mvschools.org <yyoo@mvschools.org>, mcrncichhodge@mvschools.org <mcrncichhodge@mvschools.org>

Re: Plan to Move the MVMS Campus to 70 Lomita

Hello, Mr. Arroyo, Superintendent Kaufman, and MVSD board members.

My family and I have lived at 23 Lomita Drive for more than 50 years. My mother lived on Patricia Lane long before that. I am writing to urge you to maintain the MVMS campus in its current location and not move it to the already overburdened 70 Lomita site.

Our small residential neighborhood—with roads very poorly maintained by the county—already shoulders the brunt of the traffic, parking and noise of the largest elementary school in Mill Valley. Moving the middle school here doesn't solve a problem, it simply displaces a massive burden onto Edna Maguire families and our neighborhood, generating new safety, traffic, and environmental risks.

How This Would Impact Our Neighborhood and Edna Maguire Students

Traffic Overload: The District's own environmental report says traffic on our small residential loop would be pushed beyond capacity, creating long backups, blocked driveways, and unsafe conditions for walkers, cyclists and elementary families, along with elderly pedestrians like my 90-year-old mother who is already facing off against frantic parents speeding down our street to make drop-offs and pick-ups on time.

Parking Spillover: Existing streets already struggle during Edna Maguire pick-up and drop-off. Adding, at minimum, 850 middle schoolers, plus staff, would triple enrollment density without the parking infrastructure to support it and cause significant parking issues throughout the day.

Noise and Air Quality: 2-3 years of demolition and construction would mean constant noise, dust, and compromised air quality for neighbors and elementary students, our

most sensitive age group of learners. Permanent operations would bring a significant increase in daily noise.

Emergency Safety: In a wildfire or other disaster, more than 1,200 panicked parents could flood into our small residential loop to reach their children while neighboring families are simultaneously trying to evacuate. This gridlock could block emergency vehicles and trap residents and children in harm's way.

Cultural Impact: The Draft EIR notes the site risks disturbing a significant Native American cultural area, a risk absent at the current middle school location. Discoveries made during construction could cause costly delays and halt construction indefinitely.

We Know That A Better Solution Already Exists

Renovating the current Mill Valley Middle School campus is a proven, cost-effective plan that avoids these problems. The site is centrally located and easily accessible by major roads, keeping traffic away from small residential streets while maintaining safe, stable learning environments for all our students.

Please help us protect the quality and safety of our community and our childrens' learning environment.

Respectfully,

Shonquis Moreno

Responses to Shonquis Moreno Comments

Please see Master Responses 1 and 3. Cultural Resources impacts would be mitigated by the mitigation measure included in the Alternatives Chapter.

Noise and air quality impacts are addressed in the Alternatives Chapter of the DEIR. As with the MVMS Replacement Campus Project, **Mitigation Measure 3.2-1 through 3.2-8** would also be required to reduce fugitive dust and combustion emission impacts for the Edna Maguire Alternatives. These mitigation measures would likely reduce air quality impacts for students/staff at the existing elementary school and nearby residence to **less than significant**. Although the air quality impacts at nearby residence associated with Edna Maguire Alternatives may be higher than the air quality impacts at nearby residence associated with the MVMS Replacement Campus Project, it would be expected to be **less than significant with mitigation measures.**

Temporary construction noise impacts from the Edna Maguire Alternatives would likely result in a **significant and unavoidable impact** to students and staff at the Edna Maguire campus (similar to the MVMS Replacement Campus Project).

Temporary construction noise impacts from the Edna Maguire Alternatives would likely result in a **significant and unavoidable impact** to nearby noise-sensitive receptors (compared to a **less than significant impact** for the MVMS Replacement Campus Project). This is because the noise-sensitive receptors along Lomita Drive would be much closer to the construction activities occurring at the Edna Maguire campus compared to the noise-sensitive receptors nearby the MVMS Replacement Campus Project.

For the two previous noise impacts, **Mitigation Measures 3.9-1, 3.9-3, and 3.9-4** would be applicable to construction activities for the Edna Maguire Alternatives. However, any type of construction noise barrier (as detailed in **Mitigation Measure 3.9-2**) would not be feasible due to potential circulation and vehicle access issues at the Edna Maguire campus.

The increase in traffic noise levels at noise-sensitive receptors nearby the Edna Maguire campus would likely result in a **significant and unavoidable impact** to nearby noise-sensitive receptors (compared to a **less than significant impact** for the MVMS Replacement Campus Project). This is because Lomita Drive (a two-lane road) would be the main road used to access the school and the Edna Maguire Alternatives would likely result in a significant increase in vehicle trips on this roadway. In addition, noise-sensitive receptors along Lomita Drive would be closer to traffic noise compared to the noise-sensitive receptors nearby the MVMS Replacement Campus Project access roadways. There would be no feasible mitigation measures to reduce traffic noise level increases for the Edna Maguire Alternatives.

Thus, the Edna Maguire Alternatives would likely result in greater construction noise and traffic noise impacts compared to the MVMS Replacement Campus Project.

156. Jessica Le Comments

From: **Jessica Le** <jessica.le@yale.edu>
Date: Fri, Sep 12, 2025 at 2:08 PM
Subject: West America Tae Kwon Do Relocation
To: <jarroyo@mvschools.org>
Cc: <team@westamericatkd.com>

Dear Julio Arroyo,

My name is Jessica Le, and I was a student at West America Tae Kwon Do from 2007 to 2019.

This dojo has been foundational to countless families for over 40 years. More than just a physical space for martial arts training, West America TKD has been instrumental in cultivating a uniquely intergenerational community across Marin. It is one of the rare places where children, teenagers, and parents all learn side by side. Generations of Marin families have found in this dojo not just instruction, but mentorship, belonging, and safety.

I implore you to carefully consider the impact of displacing this community to make way for a middle school. While schools are undeniably important, eliminating a decades-long community hub erases something equally vital: a space where people of all ages come together, learn from each other, and grow stronger.

On behalf of myself and many others who hold West America TKD close to our hearts, I respectfully urge you to preserve this dojo and the invaluable community it sustains.

Thank you for your time and thoughtful consideration.

Sincerely,
Jessica Le

Responses to Jessica Le Comments

Please see Master Responses 1 and 2.

157. Melissa Quigg Comments

From: **Melissa Quigg** <melissa.quigg@gmail.com>
Date: Mon, Oct 6, 2025 at 2:18 PM
Subject: Draft EIR
To: <jarroyo@mvschools.org>
Hello there!

I have reviewed the draft EIR and approve moving forward on the plan of renovating the existing middle school campus. I have a 3rd grader and Tker at Park school.

Thanks, Melissa
Melissa Quigg

Responses to Melissa Quigg Comments

See Master Response 1.

158. Tori Kaleta Comments

From: **Tori Kaleta** <tori.kaleta@gmail.com>
Date: Mon, Oct 6, 2025 at 9:53 PM
Subject: Urgent Concern: MV Middle School Modernization Project
To: <Jarroyo@mvschools.org>

Hello Mr. Arroyo,

I am writing to express deep concern over the proposed plan to tear down the structures adjacent to Edna Maguire Elementary School. This plan poses serious and far-reaching consequences for our schools, our students, and our broader Mill Valley community.

First and foremost, the acreage at the proposed site does not meet California Department of Education guidelines for school facilities. This is not a minor oversight—it's a fundamental issue that should disqualify this location from further consideration. Schools must be designed with adequate space to ensure safety, access to outdoor areas, and an enriching learning environment.

More urgently, the site cannot support projected enrollment increases. According to 2023–2024 data, Edna Maguire currently has 428 students enrolled, and Mill Valley Middle School (MVMS) has 757 students. Combining these populations at the Edna/Lomita location would result in a staggering 176.9% increase, ballooning the student body to 1,185 children on a campus never intended to hold such a number. This nearly triples the current capacity, creating dangerous overcrowding, increased safety risks, and an environment that undermines both education and well-being.

We are also deeply concerned about the loss of a centralized campus location. MVMS currently serves as a hub that's accessible to families across Mill Valley. Moving the middle school population to Edna/Lomita will increase city-wide traffic congestion, strain infrastructure, and make commutes more difficult and less sustainable. For many families, this will mean longer drives, more time on the road, and greater environmental impact—not to mention safety issues with school traffic mixing with residential and commuter flows.

Furthermore, this proposal impacts the existing Edna Maguire community. The quiet, nurturing environment that families rely on for their elementary-aged children will be disrupted by the influx of nearly 760 older students. This is not a cohesive educational strategy—it's a forced overcrowding that disrespects both student populations.

Let us not overlook the human impact: this plan would also displace current tenants who serve important community functions. These are neighbors, nonprofits, and local partners who deserve better than being abruptly removed without clear solutions.

Beyond these immediate concerns, the long-term consequences for the broader community are even more alarming:

- The proposed site borders an archaeologically sensitive Native American site at Lomita, which must be protected as a matter of legal, cultural, and moral responsibility.
- The plan would result in the loss of the Lomita soccer field, a vital recreational space used by children, families, and local teams.
- In the event of an emergency or natural disaster, the site is inadequate to safely evacuate such a large student body—let alone protect the surrounding neighborhoods.

This proposal represents a short-sighted solution to a complex problem. It sacrifices student safety, community resources, historical sites, and quality education in the name of expedience. We ask that our leaders listen to the families, educators, and community members who are raising valid, research-based, and deeply human concerns.

We urge you to reconsider this plan immediately and instead pursue alternative solutions that truly reflect our community's values—safety, sustainability, equity, and educational excellence.

Sincerely,

Tori Kaleta

A Concerned Member of the Mill Valley Community

Responses to Tori Kaleta Comments

The comment's concerns are noted. Master Response 4 addresses concerns with the alternative site's acreage. Please see Master Response 1, above regarding preferences of alternatives. Community and financial impacts are addressed in Master Response 2. Traffic congestion and emergency access issues associated with potential alternatives involving the Edna Maguire/Terra Marin campus are described in Traffic section of the Alternatives chapter of the EIR and addressed in Master Response 3, above. Archeological and tribal cultural resources issues associated with the Edna

Maguire/ Terra Marin site are addressed on pp. 5-12 and 13 of the EIR, which includes a mitigation measure for potential impacts to archaeological resources. The comment's concerns regarding shared spaces between the middle school and elementary school, and the total number of students, are noted, but are not CEQA concerns. The soccer field would not be lost due to the Interim Housing at Edna Maguire/Terra Marin Site Alternative, however it would be shared by both schools so community use would be more limited than at present.

159. Steve Richmond Comments

From: **Steve Richmond** <wsrichmond@gmail.com>
Date: Sun, Oct 5, 2025 at 7:01 PM
Subject: Public Comment – Opposition to 70 Lomita Middle School Proposal
To: <jarroyo@mvschools.org>

Dear Nukk Valley School District,

I am a resident of 112 Grace Lane, just off Lomita, and **I strongly oppose locating the new middle school at 70 Lomita next to Edna Maguire**.

Traffic & Location: 70 Lomita is not centrally located. Bringing students from across Mill Valley would funnel heavy traffic into a constrained neighborhood already congested by Edna Maguire pick-up and drop-off.

Millions spent to make sure the existing site MVMS site is safe. The school district already spent millions at the request of a small well-funded group of parents to test the existing site. It is safe. So why consider another site?

Emergency & Fire Risk: The site lies near the Horse Hill Open Space, a place with known fire risk with limited evacuation routes and high-wind fire exposure similar to the Palisades area—unsafe for large student populations. Has anyone mapped this risk? It is extensive and a fire in our area is (sadly) inevitable with **insurance companies already refusing to cover those near open spaces in Marin.**

Community Impacts: Our area already bears major traffic, noise, and safety burdens from Edna Maguire; adding a second large campus here would further erode livability and fairness for nearby residents. It is already hazardous to leave driveways or walk across the street during drop off and pick up hours. The traffic extends well into the evening with different events at the school.

Better Alternative: Renovating or rebuilding the existing, centrally located MVMS campus is safer, more logical, and far less disruptive to residents and citywide circulation.

Please remove 70 Lomita from further consideration and focus District resources on improving the existing middle-school site.

Thank you for your attention and for considering community safety and practicality in this decision.

Sincerely,
Steve Richmond
112 Grace Lane
Mill Valley, CA 94941

Responses to Steve Richmond Comments

The comment's concerns are noted. Master Response 4 addresses concerns with the alternative site's acreage. Please see Master Response 1, above regarding preferences of alternatives. Community and financial impacts are addressed in Master Response 2. Traffic congestion and emergency access issues associated with potential alternatives involving the Edna Maguire/Terra Marin campus are described in Traffic section of the Alternatives chapter of the EIR and addressed in Master Response 3, above. Archeological and tribal cultural resources issues associated with the Edna Maguire/ Terra Marin site are addressed on pp. 5-12 and 13 of the EIR, which includes a mitigation measure for potential impacts to archaeological resources.

160. Wilhelmina Peragine Comments

From: **Wilhelmina Peragine** <wilhelmina.peragine@gmail.com>
Date: Tue, Oct 7, 2025 at 7:27 PM
Subject: MVMS commentary
To: <jarroyo@mvschools.org>

To whom it may concern:

I want to urge our community to break ground on 6/2026 for a new middle school renovation at the 14-acre current location. We are in favor of keeping 6-8th together at the current site during renovation.

Each year of delay the budget is reduced by close to $10M — jeopardizing the scope and viability of the new middle school project.

We are grateful for the funds approved by voters to ensure students of Mill Valley for the next 50+ years have an updated Middle School to learn and thrive.

In speaking with many other parents at MVSD elementary schools and MVMS this seems like the most popular option.

We trust the process to ensure safety of our students and trust our district leaders and school board to make the best decisions for our community and use the bond funds wisely — adapting as information comes up.

Thank you,

Wilhelmina Peragine

Strawberry parent

Responses to Wilhelmina Peragine Comments

Please see Master Response 1.

161. Kathy Bush Comments

From: **Kathy Hwang** <kathyhwang@gmail.com>
Date: Wed, Oct 8, 2025 at 2:43 PM
Subject: Public Comment on Mill Valley Middle School Modernization Draft EIR
To: <jarroyo@mvschools.org>

Hi, I'm a Mill Valley school district parent (my kid goes to Tam Valley elementary). I support moving the middle school campus to 70 Lomita.

Looking at the draft EIR and environmental safety report, it does not give me high confidence that the current middle school location will be safe in the event of an earthquake, fire or flooding. It's in an area is that prone to all of the above, so it doesn't seem far fetched. And since it's in a liquefaction zone, it's not uncommon for earthquakes to crack caps, have more pathways for vapors to escape and increase the risk of fire and explosions (with methane). What happens to 600+ kids in the event that one or more of these things happen? Where will they all go if they are displaced indefinitely while the city tries to remedy it?

While I agree that the Lomita location is less than ideal related to traffic and space issues, I think it's paramount to put our kids safety first.

Please include these comments in the Draft EIR under my name.

-Kathy Bush

Responses to Kathy Bush Comments

Please see Master Response 1.

With respect to Alternative 5, the Mill Valley Middle School campus was built in 1972 under the Field Act, one of California's strongest and most successful school safety laws. The Field Act requires all public school buildings to be designed by licensed architects and structural engineers, reviewed and approved by the Division of the State Architect (DSA), and inspected during construction to verify compliance with rigorous seismic standards. Since its adoption in 1933, no Field Act–compliant school building has collapsed or caused student injury in an earthquake.

Under the California Administrative Code, state regulations establish a 50% replacement cost threshold when a district modernizes an existing school building. If modernization costs remain below 50% of the cost to completely rebuild the building,

then the existing building is not required to be retro-fitted as part of a full building rehabilitation unless the work increases seismic or wind loads or alters the building's lateral-force-resisting system by more than 10%. This approach is common across California and allows districts to perform smaller scale modernizations while maintaining full compliance with DSA oversight.

If the District selects the renovation alternative identified in the EIR, the next step will be to meet with DSA during the design development phase to review and confirm that the planned improvements do not exceed the thresholds of cost, strength, or loading that will trigger a full building evaluation and rehabilitation. While DSA will not require a full seismic rehabilitation if the project remains below the thresholds mentioned above, they will review the construction documents to confirm that any new structural elements added or alterations to existing elements are designed to meet current codes and standards.

With respect to the seismic safety of the Interim Campus at the MVMS site, the proposed foundation design has been reviewed by the California Geological Survey on behalf of the State Architect and determined to be appropriate to address seismic hazards including settlement and liquefaction[10].

Soil borne hazardous materials risks and impacts are addressed in the Hazards and Hazardous Materials chapter of the EIR. The Renovation Alternative would include a soil vapor control system. The School District would remedy any hazards resulting from seismic events; if the building were to be damaged, it would remain unoccupied until appropriately repaired.

[10] California Department of Conservation, California Geological Survey, Letter to Elizabeth Kaufman, Superintendent, Mill Valley School District, November 12, 2025, *Second Engineering Geology and Seismology Review for Mill Valley Middle School - Proposed Interim Campus. 425 Sycamore Street, Mill Valley, CA*. CGS Application No. 01-CGS6942.

162. Edward Rusky Comments

From: **Edward Rusky** <esr.rusky@gmail.com>
Date: Wed, Oct 8, 2025 at 3:02 PM
Subject: MVMS Renovation Project
To:
<communications@mvschools.org>, jarroyo@mvschools.org <jarroyo@mvschools.org>

I want to express my **opposition** to Mill Valley Middle School being relocated to the site at 70 Lomita Drive, for any period of time whatsoever.

I live at 10 Greenfield Court, about 1/8-1/4 a mile east of Edna Maguire School.

The bend in Lomita, where Edna Maguire and 70 Lomita sit, was very poorly designed in the first place. Lomita is one lane in each direction, heading both East and South, with very little bike-lane safety and only one side with a sidewalk. Children are often walking in the street to and from Edna. There are only three outlets from the entire Alto Bowl neighborhood: Lomita at East Blithedale, Tower at E Blithedale, and an uncontrolled intersection into E Blithedale at the Chevron Station.

Edna Maguire currently has around 425 students; MVMS has 757 of which just shy of 250 are sixth graders. So,

1. Traffic during start and end of school is now bad, backups at all three outlets; if all of MVMS moves to 70 Lomita, the numbers will almost triple at that corner, for either two years or indefinitely.

2. If only sixth grade moves to 70 Lomita, there will be 675 students at the bend in Lomita

3. If the entire MVMS moves to 70 Lomita, 1202 students at the bend in Lomita, almost triple the current number of students.

I would like to set forth only some of the negative impacts of a move of any kind to 70 Lomita, as follows.

Currently, portions of Lomita have no sidewalk; portions have no bike lane (cars park in some of the bike lanes). So there is currently a danger to pedestrians, especially children, the elderly, pets and wildlife. And there is a danger to bicyclists, particularly when they're forced into the street by parked cars. We have been told that the County intends to improve Lomita to the freeway, but unless this construction is completed by the time the MVMS students move, it will make the situation worse, not better.

Fortunately, we have not had to experience a large-scale evacuation or emergency from the Alto Bowl. But if such an event happened currently, then evacuation and the job of first responders would be very challenging and, if more students were added to the Lomita bend, (no less than 250 more and as many as 675 more) such efforts would be dangerous indeed.

Finally, it's bad enough that the renewal of Edna Maguire back in the late 1980s happened on Coast Miwok sacred lands. Building on the remaining available space will exacerbate the cultural impact upon our local heritage native American.

I honestly don't understand why remaining at the present MVMS site, avoiding the cost of building at 70 Lomita and avoiding the negative impacts mentioned above.

Please do not move any of the MVMS students to 70 Lomita.

Thank you very much for your consideration.

E

Responses to Edward S Rusky Comments

Please see Master Response 1, above regarding preferences of alternatives. Community and financial impacts are addressed in Master Response 2. Traffic congestion and emergency access issues associated with potential alternatives involving the Edna Maguire/Terra Marin campus are described in Traffic section of the Alternatives chapter of the EIR and addressed in Master Response 3, above. Archeological and tribal cultural resources issues associated with the Edna Maguire/ Terra Marin site are addressed on pp. 5-12 and 13 of the EIR, which includes a mitigation measure for potential impacts to archaeological resources. Tribal Cultural Resources are addressed in a new Chapter 3.11, which is provided in the Staff-Initiated text Changes section of this Final EIR document, and in the updated Chapter 5, which also is provided in that section of this document.

163. Erica Potter Edelson Comments

From: **Erika Potter Edelson** <erika.potter@gmail.com>
Date: Tue, Oct 7, 2025 at 2:01 PM
Subject: Public Comment for MVMS Rebuild
To: Julio Arroyo <jarroyo@mvschools.org>

Hello,

I am writing to express my strong position that the Mill Valley School District take steps to create a Middle School for all students in Mill Valley that aligns with the district's long term goals. The only plan that does this is

Create a permanent middle school at the current Edna Maguire site and relocate Edna students to the existing elementary schools (and adjacent Terra Marin if needed).

I am very concerned that the district is being incredibly **short sighted** and **biased** in the decision to rebuild the middle school at its current location.

28) **Short sighted: Rebuilding on the existing site is a very expensive, short sighted decision that will likely have to be remediated in more ways than one by future generations. We should use the Measure G investment for a building that will last for generations.** *I am also concerned that the the district is not being transparent about the current and future enrollment numbers in our district. Actual enrollment data needs to be used to build a lasting, long term facilities plan for the district. We lived through the population decline years. I saw with my own eyes classroom numbers by grade drop from 4, to 3, to 2, and class sizes decrease from 25 to 18-19 students. There are empty classrooms that could house additional students, teachers, and entire classrooms. The end of TK will make this even more apparent.*

Do we really want Mill Valley kids to be educated in a school that:

- Is seismically unsafe?
- Poses toxic soil exposures, explosive methane, other health risks?
- Will be impacted in the near future by sea level rise and potential leaching contamination?

- Is too big and expensive for the actual population size?

2. Biased: Every reason why the current Edna Maguire is not a viable site option is biased toward the families who attend that school and the people who live in that neighborhood. This is a fraction of our community. Mill Valley Middle school is the only school in our district that serves all kids, and all families. We should be making decisions that benefit as many kids in our district as possible, not just the ones who go to Edna or live in its vicinity.

Do we really want to rule out the current Edna site (which used to be a junior high) for the middle school because:

- The Edna community experienced disruption from a remodel 10-15 years ago?
- The Edna neighborhood is worried about traffic implications?
- The current site, albeit dangerous, is more “convenient”?

In summary, the district and board goals and objectives are clear, and moving Mill Valley Middle School to the current Edna Maguire site is the only option that addresses our district goals. Rebuilding the middle school on its current site is in direct opposition to these goals. I hope we can do the right thing for all students in Mill Valley, today and in the future.

*** Developing EQUITABLE Access to Excellence Educational Opportunities for All Learners.**

Let’s make decisions for all current and future middle school students, not just those at Edna McGuire.

*** Monitoring Practices, Policies, and Plans for Ensuring Positive School Climates, SAFETY and Security**

It is unsafe and uncertain to educate students at the current MVMS site.

*** Creating TRANSPARENCY for the Budget and Facilities Planning**

Please create transparency around the current and future enrollment numbers and how this impacts current and future decision making.

Thank you.

Responses to Erica Potter Edelson Comments

The commenter's concerns regarding Alternative 5 are noted. Health risks would be reduced from existing conditions because the renovated school would include a vapor intrusion mitigation system. With respect to seismic hazards, the school would be similar to existing conditions. The Field Act was introduced in 1933 along with other laws that banned the construction of unreinforced masonry buildings, and required that earthquake forces be taken into account in structural design. The Act also established the Office of the State Architect (now Division of the State Architect or DSA) which developed design standards, quality control procedures, and required that schools be designed by registered architects and engineers. These professionals must submit their plans and specifications to the State Architect for review and approval prior to construction. The same professionals were also required by the Act to periodically inspect the construction while underway and verify that the actual work completed is in compliance with the approved drawings. Peer review and inspection requirements were also introduced as another quality control procedure.

Since 1940, no building constructed under the Field Act has either partially or completely collapsed, and no students have been killed or injured in a Field Act compliant building. As such, to guide renovation of the buildings designed under Field Act requirements, the California Administrative Code establishes the 50% replacement cost threshold for the evaluation and retrofitting of structural systems as noted below. Additionally, this requirement can be triggered when seismic weight or wind loads are increased by more than 10% from the original construction and/or impacts on the lateral force resistance of more than 10% due to modifications to the structure. The renovation proposal for Mill Valley Middle School would not exceed that 10%.

With respect to the seismic safety of the Interim Campus at the MVMS site, the proposed foundation design has been reviewed by the California Geological Survey on behalf of the State Architect and determined to be appropriate to address seismic hazards including settlement and liquefaction[11].

[11] California Department of Conservation, California Geological Survey, Letter to Elizabeth Kaufman, Superintendent, Mill Valley School District, November 12, 2025, *Second Engineering Geology and Seismology Review for Mill Valley Middle School - Proposed Interim Campus. 425 Sycamore Street, Mill Valley, CA*. CGS Application No. 01-CGS6942.

164. Todd Gates Comments

From: Todd Gates <gatestodd@yahoo.com>

To: jarroy@mvschools.org <jarroy@mvschools.org>

Sent: Tuesday, October 7, 2025 at 07:36:34 AM PDT

Subject: Response to September Draft EIR for MVMS

Mr. Arroyo-

Please find attached my correspondence regarding the Draft EIR for MVMS. I have also copied the Board members on this email, and I have copied the body of my letter in the rest of the email below. Please do not hesitate to contact me at this email (gatestodd@yahoo.com) or my cell, 650-280-0012, if you wish to discuss further.

Todd Gates

75 Lomita Drive

I believe the EIR reaches a reasonable conclusion by identifying Rehabilitation as the Environmentally Superior Alternative to the base Project to reconstruct the Middle School. However, the subsequent statement in the concluding paragraph of Chapter 5 that the Dual Schools at the Edna Maguire site would also reduce impacts and achieve more of the project's goals is without sufficient information or analysis, and it invites controversy.

Nearly three quarters of this report from Chapter 2 through Chapter 4 addresses environmental risks, impacts, and mitigations in great detail at the existing middle school site. There are only several pages in Chapter 5, however, that mention impacts to the Alto neighborhood surrounding Lomita Drive and the Edna Maguire School.

Many considerations are missing in the EIR to justify moving the middle school to the Edna Maguire/Terra area. Mill Valley School District Board should evaluate all the environmental and civic impacts to the Alto neighborhood before making such a decision. I think they will find the decision is wrong.

Some of these other considerations include the following:

A. The Edna / Terra location involves a different history that include native American communities and dairy farms. The underlying strata has changed over the period. The location, at the base of Horse Hill, is near forest land in which different wildlife exists

than that of the existing middle school site. The EIR addresses neither of these different conditions.

B. The geology and the drainage patterns are also different at the base of Horse Hill. Not only is there a contained stream that runs under the existing school, but stormwater runoff from adjacent hillsides causes soil erosion and flooding that already overwhelms the Lomita drive drainage system and sends water and debris on to nearby properties. Any additional excavation for new construction at the east end of the Terra Linda property where the Horse Hill is very steep would exacerbate the problem.

C. At the base of Horse Hill, The Edna/Terra site is a few blocks away from a Moderate Fire Hazard Severity Zone, while the middle school site is much farther away from any Fire Hazard Severity Zone.

D. A high-pressure gas main runs under “north-south” Lomita Drive and directly under the existing Mill Valley Middle School.

E. The area surrounding the Edna/Terra site is much more residential than the area surrounding the middle school site. Noise, air quality, and dust impacts have only a cursory mention in this EIR for this area compared to the substantial analysis around the middle school site.

F. While the EIR acknowledges that the increased student, teacher and administration population would create traffic and parking problems in the residential Alto neighborhood around Lomita Drive, it largely dismisses the issue saying that traffic problems are not considered as impacts under CEQA. The conditions in Alto are very different from the roads and sidewalk at the middle school, which have two lanes each way and traffic lights. The increased impacts on Lomita Drive are real.

The suggestion that staggered start times would help ease congestion is insufficient. The commuting population would increase by three times, and probably more if either of the two schools’ populations reached capacity. The proposed reduction of the Edna Maguire parking and circulation loop for drop-off/pick-up will back traffic onto Lomita more than it already does. A new parking area east of the Terra site for the additional school population will make Lomita congestion even worse since the two entries would be so close together. Additionally, the recent closure of Miller Ave Whole Foods is already bringing more traffic to the Whole Foods on the Lomita corridor.

G. From a safety standpoint, emergency services to the school and the neighborhood would be compromised. More importantly, emergency egress from the Alto/Terra site

would become severely limited in the case of fire, gas explosion, campus terrorism, flooding, or earthquake.

Also from a safety standpoint, while many students can walk to school on the "north-south" bike/pedestrian path, many neighborhood students use the sidewalks on Lomita Drive which are old and narrow like Lomita Drive itself. On "east-west" Lomita Drive, there is also a bike lane parallel to residential parking. Cars often cannot pass each other at the same time without swerving into parts of the road that students spill onto from narrow sidewalks or the "east-west" bike lane.

H. Complicating this insufficient surface infrastructure is the fact that alternating segments of Lomita Drive and sidewalks are managed by different jurisdictions- the City of Mill Valley and the County. Resurfacing of Lomita (North South) was last performed in 1997. Lomita Drive from Ashford Ave up and past the Edna/Terra site has been neglected for decades because the County and the City do not coordinate very well together. County Supervisor Moulton Peters has observed this breakdown while serving on City Council and now on the County Board. She has intervened with only marginal impact.

The County, at least, is now nearing completion of a long-planned improvement to the drainage system and road/sidewalk surfaces on "east-west" Lomita Drive. The reconstruction of the Terra site would interfere with that work, and history suggests that the School District will not coordinate with those efforts very well.

The School District is part of this jurisdictional puzzle and has not been responsive to road improvements in front of the Edna Maguire that were promised over a decade ago at the new entry way to Edna Maguire. See Item 2.J of the January 2012 Agreement, of which I was a part.

The notion of building the middle school at the Edna/Terra site in place of or adjacent to the existing elementary school is a significant departure from voter approved Measure G which advertised using the existing middle school site for Mill Valley Middle School reconstruction. I do not believe the measure would have been passed if a move to the Alto neighborhood was presented in the original plan. It certainly would have created controversy if for no other reason than the Terra site adjacent to the Edan Maguire school is half the size of the existing middle school site.

While I am somewhat sympathetic to some people's concerns about the nearby wastewater plant or the historic dump, I think there are very reasonable responses that should assuage any worry. First, both wastewater plants and old landfills are well regulated and constantly evaluated under state and federal laws. These kinds of

facilities exist and operate safely near populations all over the country. The potential risks are well understood and managed. There are proven construction methods regularly performed that protect the well-being of people when building atop landfills. At the wastewater plant, tens of millions of dollars have been spent very recently to upgrade the facility. Many of the improvements were to reduce odors, and they continue to invest in odor reducing measures.

Furthermore, history does not suggest that there have been health problems associated with the current location of the middle school. I have not heard of any health impacts to students, teachers, or administrators during its existence. My children attended the existing middle school fifteen years ago and did not suffer from sewage odor or existence of garbage below them. I know teachers who worked there for years and speak of neither as a lasting concern.

By identifying Rehabilitation on the middle school site as the Environmentally Superior Alternative to the base Project, the EIR also better provides for one of the Project objectives which is green building practices. Renovation of the existing middle school building is a far superior green practice than demolition, disposal and subsequent construction of a new building which is what the Dual Schools alternative would require of the Terra building. The EIR is plainly wrong at the end of Chapter 5 when it says this Dual School alternative would reduce impacts to air quality, biological resources, hazards, hydrology and geology compared to the proposed Project. It has simply neglected to evaluate those issues and many others at the Edna/Terra site.

The Dual Schools alternative at Edna/Terra also begs the question as to what the District would intend to do with existing middle school site.

I ask the Mill Valley School District Board to refocus effort on using the existing middle school site for new construction or rehabilitation of the Mill Valley Middle School as was originally presented under voter approved Measure G. To do otherwise invites controversy, creates resentment, and leads to dispute.

I appreciate your consideration of my opinions and invite you or any of the Board Members to discuss matters more if you are willing.

Sincerely,

Todd Gates

cc: MVSD Board Members by email

Responses to Todd Gates Comments

Responses to comments are provided below, following the same letter designations as used in the comment.

A. The potential alternatives that would involve use of the Edna Maguire/Terra Marin site would be located on developed school facility sites, and would therefore not have the potential to significantly affect wildlife.

B. None of the Edna Maguire/Terra Marin site alternatives would involve excavation into the hillside. All potential facilities would be constructed on already developed areas of that site.

C. Fire severity zones are described in the Hazards and Hazardous Materials chapter of the EIR. Please also see Master response 3 with respect to emergency access issues.

D. The comment's stated location of the gas main at the MVMS is noted. Any subsurface work at that site would require determining the locations of all underground infrastructure prior to any excavations.

E. Noise and air quality impacts at the proposed Project site are addressed in those respective chapters of the EIR, while potential impacts at the alternative sites are addressed in Chapter V, Alternatives. As with the MVMS Replacement Campus Project, **Mitigation Measure 3.2-1 through 3.2-8** would also be required to reduce fugitive dust and combustion emission impacts for the Edna Maguire Alternatives. These mitigation measures would likely reduce air quality impacts for students/staff at the existing elementary school and nearby residence to **less than significant**. Although the air quality impacts at nearby residence associated with Edna Maguire Alternatives may be higher than the air quality impacts at nearby residence associated with the MVMS Replacement Campus Project, it would be expected to be **less than significant with mitigation measures.**

   Temporary construction noise impacts from the Edna Maguire Alternatives would likely result in a **significant and unavoidable impact** to students and staff at the Edna Maguire campus (similar to the MVMS Replacement Campus Project).

   Temporary construction noise impacts from the Edna Maguire Alternatives would likely result in a **significant and unavoidable impact** to nearby noise-sensitive receptors (compared to a **less than significant impact** for the MVMS Replacement Campus Project). This is because the noise-sensitive receptors along Lomita Drive

would be much closer to the construction activities occurring at the Edna Maguire campus compared to the noise-sensitive receptors nearby the MVMS Replacement Campus Project.

For the two previous noise impacts, **Mitigation Measures 3.9-1, 3.9-3, and 3.9-4** would be applicable to construction activities for the Edna Maguire Alternatives. However, any type of construction noise barrier (as detailed in **Mitigation Measure 3.9-2**) would not be feasible due to potential circulation and vehicle access issues at the Edna Maguire campus.

The increase in traffic noise levels at noise-sensitive receptors nearby the Edna Maguire campus would likely result in a **significant and unavoidable impact** to nearby noise-sensitive receptors (compared to a **less than significant impact** for the MVMS Replacement Campus Project). This is because Lomita Drive (a two-lane road) would be the main road used to access the school and the Edna Maguire Alternatives would likely result in a significant increase in vehicle trips on this roadway. In addition, noise-sensitive receptors along Lomita Drive would be closer to traffic noise compared to the noise-sensitive receptors nearby the MVMS Replacement Campus Project access roadways. There would be no feasible mitigation measures to reduce traffic noise level increases for the Edna Maguire Alternatives.

Thus, the Edna Maguire Alternatives would likely result in greater construction noise and traffic noise impacts compared to the MVMS Replacement Campus Project.

F. Traffic impacts along Lomita Drive near the school, including queuing at the access driveways, are addressed in the Alternatives chapter of the EIR. Please note that congestion and queuing are not CEQA impacts except as they may affect emergency access. Any alternative at the Lomita site would include staggered school hours and a Traffic Management Plan to minimize traffic congestion. Please see Master Response 3 for a discussion of emergency access at that site.

G. The Commenter expresses concerns regarding existing student pedestrian safety, which are noted. Please also see Master Response 3.

H. The MVSD would coordinate with the County regarding improvements improvement to the drainage system and road/sidewalk surfaces on “east-west” Lomita Drive to avoid construction conflicts.

The legal history of the Edna Maguire School, and any constraints that legal settlements may have on other site uses are not CEQA issues.

The comment's preference for renovation of the existing school is acknowledged. See also Master Response 1.

165. Anita Forbes Comments

From: **Anita Forbes** <anitaforbes@gmail.com>
Date: Mon, Oct 6, 2025 at 4:22 PM
Subject: feedback on MVMS Modernization project
To: <jarroyo@mvschools.org>
Hi,
I would like to give some additional feedback on the superintendent's recommendation to rebuild the current middle school, and have students stay in temporary classrooms at the MVMS site during construction. Having students stay in temporary classrooms near the construction site (and closer to the sewage treatment plant) is not a proper learning environment for students. Excess noise, dust, smells from construction equipment nearby will create too many distractions for students, as will the se age smell. It will be much more disruptive for students than having the temporary classrooms at the Edna Maguire campus. Also, although it may create less health hazards than the previous plan of building a new middle school on the site, it is still difficult to predict with certainty what health hazards could arise from being near an active construction site for 2 years.

I believe the plan to rebuild the middle school on the current site is also a poor choice because it does not adequately address the liquefaction and earthquake risks (and sea-level rise). Spending so much money to rebuild the current school without fully addressing those risks is a poor use of taxpayer money, and will likely result in a need for more costly repairs and upgrades (or the need to build a new middle school) in the not too distant future. It is also a risk to student safety in the event of an earthquake.

The alternatives of building a new middle school at the Edna Maguire site, or at least locating the temporary classrooms at Edna Maguire during construction are by far better alternatives.

Responses to Anita Forbes Comments

Please see Master Response 1 regarding preferences among the Project and alternatives. Noise and dust associated with a temporary campus at the MVMS site are addressed in those respective sections of the EIR.

As with the MVMS Replacement Campus Project, **Mitigation Measure 3.2-1 through 3.2-8** would also be required to reduce fugitive dust and combustion emission impacts for the Edna Maguire Alternatives. These mitigation measures would likely reduce air quality impacts for students/staff at the existing elementary school and nearby residence to **less than significant**. Although the air quality impacts at nearby residence

associated with Edna Maguire Alternatives may be higher than the air quality impacts at nearby residence associated with the MVMS Replacement Campus Project, it would be expected to be **less than significant with mitigation measures.**

Temporary construction noise impacts from the Edna Maguire Alternatives would likely result in a **significant and unavoidable impact** to students and staff at the Edna Maguire campus (similar to the MVMS Replacement Campus Project).

Temporary construction noise impacts from the Edna Maguire Alternatives would likely result in a **significant and unavoidable impact** to nearby noise-sensitive receptors (compared to a **less than significant impact** for the MVMS Replacement Campus Project). This is because the noise-sensitive receptors along Lomita Drive would be much closer to the construction activities occurring at the Edna Maguire campus compared to the noise-sensitive receptors nearby the MVMS Replacement Campus Project.

For the two previous noise impacts, **Mitigation Measures 3.9-1, 3.9-3, and 3.9-4** would be applicable to construction activities for the Edna Maguire Alternatives. However, any type of construction noise barrier (as detailed in **Mitigation Measure 3.9-2**) would not be feasible due to potential circulation and vehicle access issues at the Edna Maguire campus.

The increase in traffic noise levels at noise-sensitive receptors nearby the Edna Maguire campus would likely result in a **significant and unavoidable impact** to nearby noise-sensitive receptors (compared to a **less than significant impact** for the MVMS Replacement Campus Project). This is because Lomita Drive (a two-lane road) would be the main road used to access the school and the Edna Maguire Alternatives would likely result in a significant increase in vehicle trips on this roadway. In addition, noise-sensitive receptors along Lomita Drive would be closer to traffic noise compared to the noise-sensitive receptors nearby the MVMS Replacement Campus Project access roadways. There would be no feasible mitigation measures to reduce traffic noise level increases for the Edna Maguire Alternatives.

Thus, the Edna Maguire Alternatives would likely result in greater construction noise and traffic noise impacts compared to the MVMS Replacement Campus Project.

166. Jasmine Bean Comments

From: **Jasmine Bean** <jasminefsears@gmail.com>
Date: Sun, Oct 5, 2025 at 5:48 PM
Subject: Draft EIR comments
To: <jarroyo@mvschools.org>

Hello,

I have reviewed the Draft EIR and would like to express my strong support for **Option 1: renovating the existing MVMS campus on Sycamore Drive**. It is imperative that this project move forward without further delay.

As a parent of two current MVMS students (6th and 8th grade) and one fourth grader, I urge the district to begin construction as soon as possible. Our students and community have waited long enough. The information and analysis are clear—**Option 1 is what's best for our students, families, and the future of Mill Valley.**

Thank you for your time and dedication to our schools.

Kind regards,
Jasmine Bean

Responses to Jasmine Bean Comments

Please see Master Response 1.

167. Robert Mithun Comments

From: **ROBERT MITHUN** <rmithun@comcast.net>
Date: Sat, Oct 4, 2025 at 12:12 PM
Subject: MVMS Improvement Options and the DEIR
To: jarroyo@mvschools.org <jarroyo@mvschools.org>

Dear Julio Arroyo,

I have reviewed the DEIR and understand the tradeoffs discussed and the options for the improvements recommended for our MVMS. I believe that the options for keeping the MVMS at its current location is in the best interest for our MV students, MV residents and the city of MV. I believe the most important criteria are:

- That it is best for our students, both in middle school and elementary school, to have enough classroom, cafeteria, and recreational fields and space for their educational experience.
- That it is best for these two schools to be in separate locations for the benefit of the students.
- That it is far, far better for traffic and transportation to have these two schools to be separated geographically and not to be located on a small, residential street that was not planned for this much traffic.
- That the environmental concerns developed in the DEIR can be managed adequately and do NOT require that the MVMS be permanently moved.

Our three children attended both Edna Maguire and MVMS schools and had a very good experience.

Thank you for permitting MV residents to review the DEIR and participate in this important decision.

Sincerely,

Robert Mithun, MD
9 Stanton Way
Mill Valley

Responses to Robert Mithun Comments

Please see Master Response 1.

168. Conan Putnam Comments

From: Conan Putnam <conanoonaz@sbcglobal.net>
Date: Fri, Oct 3, 2025 at 3:35 PM
Subject: PROPOSED MIDDLE SCHOOL AT 70 LOMITA DRIVE-VOTE NO
To: jarroyo@mvschools.org <jarroyo@mvschools.org>

TO: MILL VALLEY SCHOOL DISTRICT

MVSD is committed to modernizing its middle school facilities. Renovating the existing MVMS campus, is identified as the Environmentally Superior Alternative and also presents significant academic and programmatic advantages for middle school students. This option leverages the current site's advantageous size and central location, which is crucial for fostering a cohesive 6th through 8th grade community.

Maintaining a unified campus ensures that students from various elementary schools come together in a dedicated middle school environment, supporting their developmental and social needs before transitioning to high school. The renovation plan also maintains 12 classrooms per grade level and has the capacity to accommodate future enrollment increases.

Conversely, building a new middle school at the Edna Maguire/Terra Marin site, presents substantial challenges. The site's limited acreage is a significant concern for accommodating both elementary and middle school populations, potentially leading to cramped conditions and developmental and safety issues with shared spaces.

The co-location of elementary and middle school students is generally not considered ideal for their age-appropriate programmatic needs. This alternative also carries a high risk of disrupting a culturally significant Native American burial site and would inevitably exacerbate traffic congestion in an already impacted neighborhood, affecting accessibility for families from across the district.

For these reasons, please VOTE NO on locating the Mill Valley Middle School at 70 Lomita Drive.

Sincerely,

Conan Putnam, Homeowner
102 Lomita Drive
Mill Valley, CA 94941

Responses to Conan Putnam Comments

Please see Master Responses 1 and 3, above, regarding preferences for the Project and alternatives, and traffic impacts, respectively. Cultural resources for the Project site are addressed in Chapter 3.1, and in Chapter 5 for the alternatives. A new Tribal Cultural Resources chapter and alternatives discussions are included in the Staff-Initiated Text Changes section of this Final EIR.

169. Tina Humphrey Comments

From: **Buildergirl** <tina@buildergirl.com>
Date: Wed, Oct 1, 2025 at 7:11 PM
Subject: Moving the middle school to Lomita
To: jarroyo@mvschools.org <jarroyo@mvschools.org>

Hi Julie,

Please consider this letter my strong statement that there seems to be no valid reason for moving the middle school from an open area of 4 acres with several lanes of traffic flow for ingress and egress (and at an intersection!), to a very small site on a single lane road.

I've read the arguments by a vocal few who seem not to understand the horrible impact of moving the school vs rebuilding in the location it now is. All of the comments I've read are weak and selfish, not to mention completely ignoring the impact on the Lomita neighborhood.

I'm sad that this small but loud group has impeded the original intent to rebuild earlier and hope the resolution to get started now moves forward.

Thank you for taking in all of our letters.

Tina

Tina Marie Humphrey

Response to Tina Humphrey Comments

Please see Master Response 1.

170. Marti Grimminck Comments

From: **Marti Grimminck** <mwgrimminck@gmail.com>
Date: Wed, Oct 1, 2025 at 5:12 PM
Subject: Objection to Proposed Middle School at 70 Lomita Drive
To: <jarroyo@mvschools.org>

Attn: Julio Arroyo, Dir. Of Maintenance and Operations

I am writing to express my strong objection to the proposed location of a new middle school at **70 Lomita Drive**. As a long-time community member and parent, I have firsthand experience with this site and the surrounding neighborhood, and I believe this proposal poses serious challenges to both residents and students.

When my son attended Terra Marin at this location, his class of 14 students was considered the *largest* class there. Most of the students came from outside Mill Valley. Even with such small enrollment, the site was never designed to accommodate the volume of traffic and activity that a full middle school would generate. Placing hundreds of local children there would create unmanageable congestion and safety hazards.

Our block in Scott Valley—**Azalea Drive**—is already overwhelmed each morning and afternoon with traffic spillover from **Edna Maguire Elementary**. Parents routinely bypass the intended access routes because they are already congested, cutting through our once-quiet (pre-Edna construction) neighborhood instead. With no effective district oversight or traffic management currently in place, the situation has *deteriorated* to unsafe and disruptive levels. It is inconceivable to add another school with an even greater traffic load when **existing problems remain unaddressed**.

Furthermore, this site is home to the long-standing **Tae Kwon Do program**, a beloved institution that has served our community for decades. It would be a loss to our town to displace such a valued resource for children and families.

The district must consider the cumulative and long-term impacts of its facilities planning. Placing a middle school at 70 Lomita Drive is not a sustainable or responsible choice. I urge you to reject this proposal and renovate the existing location – this better serves both the educational mission of the district and the well-being of our community.

Thank you for your attention to this matter.

Best,

Marti Grimminck

19 Azalea Drive, Mill Valley

Responses to Marti Grimminck Comments

Please see Master Responses 1-3 with respect to project/alternative preferences, traffic issues, and the Tae Kwon Do dojo. Cumulative and long-term impacts are addressed in the EIR. Please note that the Interim Housing at Edna Maguire/Terra Marin would be for a two-year duration only.

171. Tony Grimminck Comments

From: **Tony Grimminck** <ferdi7308@gmail.com>
Date: Wed, Oct 1, 2025 at 2:32 PM
Subject: Objection to Proposed Rebuild of Mill Valley Middle School at 70 Lomita Drive
To: jarroyo@mvschools.org <jarroyo@mvschools.org>

To the Tam Valley School District Board of Trustees

Attn: Julio Arroyo, Dir of Maintenance and Operations

Dear Members of the Board,

I am writing as a longtime Mill Valley resident and homeowner in the Scott Valley neighborhood on Azalea Drive to express my strong objection to the proposal to rebuild Mill Valley Middle School at 70 Lomita Drive.

Traffic and Congestion Concerns

Our neighborhood already suffers from significant traffic congestion due to drop-off and pick-up activity at Edna Maguire Elementary. Despite the school providing adequate on-site facilities and posting signage to discourage off-site parking, many parents regularly park on Azalea Drive and walk their children into the school. This has caused unsafe congestion, increased noise, and ongoing disruption to the Scott Valley community. The addition of a middle school at 70 Lomita Drive would only amplify these traffic and parking issues, compounding an already problematic situation.

Environmental and Health Impacts

The demolition and construction required for a new middle school would extend over several years. This will bring elevated dust, noise, and air quality concerns to our neighborhood, directly impacting the health and wellbeing of nearby residents. Given the site's location, the ripple effects of construction traffic and disruption would not be confined to Lomita Drive but would spread across the Scott Valley area.

Safety Risks

The proposed site lies in an area that has already experienced flooding and is at risk from wildfires, with two recent incidents underscoring that danger. Concentrating hundreds more students in such a constrained, high-risk zone is not only ill-advised but irresponsible from a safety standpoint.

Suitability of Existing Location

The current Mill Valley Middle School site is ideally located. It is adjacent to the bike path, near (but not directly next to) Tamalpais High School, and offers ample space for academic facilities, playing fields, and future expansion. It remains the best-suited and most responsible location for reconstruction. The community would be far better served by reinvesting in and upgrading the existing site, rather than forcing an ill-fitting project into Lomita Drive.

Conclusion

On behalf of myself and my neighbors, I strongly urge the District to abandon the Lomita Drive proposal and to prioritize rebuilding the middle school at its current, well-situated location. The proposed relocation threatens to compromise traffic safety, environmental quality, and public health, while ignoring the proven strengths of the existing campus.

Thank you for your consideration.

Sincerely,
Tony Grimminck

19 Azalea Drive
Mill Valley, CA 94941

Responses to Tony Grimmnick Comments

Traffic and congestion issues are addressed in Chapter 5 of the EIR and further addressed in Master Response 3. Environmental Health impacts and risks are addressed in the Air Quality and hazards and Hazardous Materials chapters of the EIR. The comment's concerns regarding the suitability of the existing location are noted.

As with the MVMS Replacement Campus Project, **Mitigation Measure 3.2-1 through 3.2-8** would also be required to reduce fugitive dust and combustion emission impacts for the Edna Maguire Alternatives. These mitigation measures would likely reduce air quality impacts for students/staff at the existing elementary school and nearby residence to **less than significant**. Although the air quality impacts at nearby residence associated with Edna Maguire Alternatives may be higher than the air quality impacts at nearby residence associated with the MVMS Replacement Campus Project, it would be expected to be **less than significant with mitigation measures.**

Temporary construction noise impacts from the Edna Maguire Alternatives would likely result in a **significant and unavoidable impact** to students and staff at the Edna Maguire campus (similar to the MVMS Replacement Campus Project).

Temporary construction noise impacts from the Edna Maguire Alternatives would likely result in a **significant and unavoidable impact** to nearby noise-sensitive receptors (compared to a **less than significant impact** for the MVMS Replacement Campus Project). This is because the noise-sensitive receptors along Lomita Drive would be much closer to the construction activities occurring at the Edna Maguire campus compared to the noise-sensitive receptors nearby the MVMS Replacement Campus Project.

For the two previous noise impacts, **Mitigation Measures 3.9-1, 3.9-3, and 3.9-4** would be applicable to construction activities for the Edna Maguire Alternatives. However, any type of construction noise barrier (as detailed in **Mitigation Measure 3.9-2**) would not be feasible due to potential circulation and vehicle access issues at the Edna Maguire campus.

The increase in traffic noise levels at noise-sensitive receptors nearby the Edna Maguire campus would likely result in a **significant and unavoidable impact** to nearby noise-sensitive receptors (compared to a **less than significant impact** for the MVMS Replacement Campus Project). This is because Lomita Drive (a two-lane road) would be the main road used to access the school and the Edna Maguire Alternatives would likely result in a significant increase in vehicle trips on this roadway. In addition, noise-sensitive receptors along Lomita Drive would be closer to traffic noise compared to the noise-sensitive receptors nearby the MVMS Replacement Campus Project access roadways. There would be no feasible mitigation measures to reduce traffic noise level increases for the Edna Maguire Alternatives.

Thus, the Edna Maguire Alternatives would likely result in greater construction noise and traffic noise impacts compared to the MVMS Replacement Campus Project.

172. Alex Johnson Comments

From: **Alex Johnson** <alexanderjohnson@gmail.com>
Date: Wed, Oct 1, 2025 at 12:46 PM
Subject: MVMS DRAFT EIR public comment – Alex Johnson
To: <jarroyo@mvschools.org>
To: Mill Valley School District Board of Trustees
Attn: Julio Arroyo, Director of Maintenance and Operations
411 Sycamore Avenue
Mill Valley, CA 94941
jarroyo@mvschools.org
October 1, 2025

Dear Board of Trustees,

As a homeowner in the district and as the parent of two children in public Mill Valley schools—one at Strawberry Point Elementary and one at Mill Valley Middle School—I urge you to select Option 1 and renovate the existing middle school campus. This fiscally responsible path will deliver vital facility upgrades, support student safety and learning, with the least amount of community/ E blythdale disruption.

It is the Board's duty and responsibility to expediently move these modernization projects forward for the benefit of all Mill Valley families, and not allow this critical, voter funded project to be delayed and denied by a small minority whose views do not reflect the values of the larger Mill Valley and Strawberry community.

Our children deserve a modern, safe, and inspiring school environment Mill Valley citizens have voted for the project and funded it.

It is time to act on this shared commitment.

Sincerely,

Alex Johnson

Mill Valley, CA

Response to Alex Johnson Comments

Please see Master Response 1.

173. Michael Scurich Comments

From: **Mscurich** <mscurich@aol.com>
Date: Wed, Oct 1, 2025 at 12:00 PM
Subject: Mill Valley Middle School Construction
To: jarroyo@mvschools.org <jarroyo@mvschools.org>

School Board Members:

As a resident for over 47 years, I am very disturbed about the construction process of the Mill Valley Middle School. Voting for the bond issue was a big mistake. I can' t believe there is now an environmental study being done after the bond issue was funded, not knowing all of the costs and concerns for this project. The board has been very irresponsible with the funds from this bond issue. As inflation continues to be a large factor for increased labor and material costs and the delays for this project, this project must STOP! This project must STOP rather trying to fix it by a "band-aid" approach and not addressing the serious issues concerning this site, for example a sinking dump site and increased tidal rise which is affecting the foundation of the current school. With all the problems being discovered at the Mill Valley Middle school site, this construction project must STOP!

It seems everyone has forgot the floods we had in 1982/1983. If we have a similar rain event in the future, the Mill Valley Middle School will be under water with increase chances of rising tides.

With student population projected to drop over the coming years, the Edna Maguire Elementary School School should be partitioned into an elementary and middle school. A combined school solution would save the tax payers a lot of money and mitigate all the problems that have been discovered.

The Mill Valley Middle School site is not an environmentally safe site for a school and should be demolished and provide an additional recreation/field area.

I hope you take my comments seriously.

Sincerely,

Michael Scurich
207 LaVerne Avenue
Mill Valley, CA 94941

Responses to Michael Scurich Comments

Please see Master Response 1 regarding project/alternative preferences. Flood hazards associated with the proposed Project site are addressed in the Hydrology and Water Quality Chapter in the EIR. Other environmental hazards are addressed in the Soils and Geology, Air Quality, Noise, and Hazards and Hazardous Materials chapters in the EIR.

174. Nicole Fitzpatrick Comments

From: **Nicole Fitzpatrick** <nicolefitz211@gmail.com>
Date: Fri, Sep 12, 2025 at 1:58 PM
Subject: Please Keep West America TKD in Its Home
To: <jarroyo@mvschools.org>

Dear Mill Valley School District Board,

I strongly urge you not to displace West America TKD & After Care from its Lomita Dr. location. For 42 years, this dojo has been more than a building—it's been a safe, supportive community where children and families learn discipline, confidence, and respect.

Losing this space would disrupt a legacy that has shaped generations. Please find a solution that allows the middle school renovation to move forward without forcing West America from the home it has built with this community.

Thank you for your consideration.

Sincerely,

Nicole

(a local Southern Marin Mom, community member and proud supporter of West America TKD)

Nicole Fitzpatrick

Responses to Nicole Fitzpatrick Comments

Please see Master Responses 1 and 2, above.

175. Julia Winn Comments

From: **Julia Winn** <jwinn@mvschools.org>
Date: Fri, Sep 12, 2025 at 1:03 PM
Subject: Modernization comment
To: <jarroyo@mvschools.org>
Hello Julio,

I am a new TK instructional aid at Edna Maguire and wanted to share my thoughts on the potential move of the 6th grade MVMS class to the West America building. As a TK teacher this year I have seen firsthand how families need to the affordable aftercare options that West America provides it is significantly more affordable than the other aftercare options at the community center and at the early enrichment center. Removing this would remove vital infrastructure from the community and put many parents and children in limbo. I would also like to address the fact that the traffic going in and out of Edna Maguire is already significant adding an entire class of six graders to this area would completely clog the traffic on this road and force people to make less safe driving decisions when there are small children, walking and biking along the road to school. I am Almost constantly unable to get into my staff parking spot first thing in the morning, because frustrated parents and caregivers cannot find any other spots and decide to go in the staff lot which sets me back and makes me have to leave earlier for my role. Thanks for sharing some of these thoughts.

Julia Winn
Edna Maguire TK instructional aid

Responses to Julia Winn Comments

Please see Master Responses 1, 2, and 3, above.

176. Marci Furutani and Adrian Fernandez Comments

To: MVSD School Board
From: Marci Furutani & Adrian Fernandez
Address: 126 Lomita Dr. Mill Valley, CA 94941
Re: Public Comment Regarding Middle School Site Selection

Dear Members of the Board,

Our names are **Marci Furutani and Adrian Fernandez**, and we live at **126 Lomita Drive** with our two children—a kindergartner at Edna Maguire and a 10-year-old son who will soon be entering his middle school years. As both parents and neighbors directly impacted by this proposal, we feel strongly that the middle school should **not** be built at the 70 Lomita site.

When we think about our children's school years ahead, what we want most is stability, safety, and a strong sense of community. Renovating the existing middle school provides that. Building at Lomita would not.

Here's why:

- **Safety of Renovations & Temporary Housing:** The Environmental Impact Report shows it is safe to renovate the existing school and use temporary portables. California's strict school construction requirements give us confidence that our children—and all students—would be protected during the process.
- **Disruption to Edna Maguire:** Edna just finished a major renovation in 2014. Asking this community to undergo another upheaval is unfair. Our youngest is just beginning her school journey at Edna, and stability during these foundational years is essential.
- **Traffic & Parking:** Living on Lomita Drive, we already experience daily congestion. Adding hundreds more cars would create dangerous bottlenecks, extend drop-off and pick-up chaos, and overwhelm limited parking. Removing spaces without replacements is simply not workable.
- **Space Limitations:** The current MVMS campus is 14 acres. The Lomita site is only 4 acres—far too small to reasonably or safely house a middle school under California Department of Education guidelines.
- **Archaeological Concerns:** The Edna site holds Coast Miwok cultural remains. New construction risks disturbing sacred ground, leading to delays and unnecessary expense.

Responses to Marci Furutani and Adrian Fernandez Comments

Please see Master Responses 1, 3, and 4. Cultural Resources impacts associated with the Edna Maguire/Terra Marin site alternatives are discussed in Chapter 5 in the EIR. Additional

177. Emily Maynard Comments

From: **Emily Maynard** <ezmaynard@gmail.com>
Date: Fri, Sep 12, 2025 at 11:17 AM
Subject: Comment on MVMS renovation
To: <jarroyo@mvschools.org>

Dear Renovation Committee, thank you for your now tireless work on this proposed renovation. I continue to believe that a renovated middle school would be an incredible opportunity and improvement for our students and our community. I wish that our community members would put as much effort into ensuring and enforcing their child's proficiency in grade-appropriate math and science skills, as these are much more threatening issues in my opinion. I am saddened that certain community members have taken it upon themselves to override a city-wide approved measure and cost the community time and unbelievable expense.

As for the path forward; it would be a deeply unforgivable offense to desecrate the Edna Maguire elementary school in its current form as an elementary school. As we know from this current planning process, unbelievable effort and resources went into building that school in its current form and that should be revered and respected.

I am however supportive of the use of Edna/terra Marin as temporary spaces to house students while the existing middle school is being remodeled. I am also supportive of portables being built on the current MVMS lot although I think this creates more expense and waste.

Please renovate the MVMs gym in conjunction with the school building renovation. We have incredible home-grown Athletic talent to nurture and support in this community!

Many thanks for your consideration. Best, Emily Maynard from Nelson Ave

Emily Maynard

Responses to Emily Maynard Comments

Please see Master Response 1.

178. Sasha Noller Comments

From: Sasha Noller <sasharodionoff@yahoo.com>
Date: Fri, Sep 12, 2025 at 10:18 AM
Subject: Public Comment on Middle School Modernization EIR and Support for MVMS Remodel
To: <jarroyo@mvschools.org>

Dear Board of Trustees,

I am writing as a concerned parent of 8th and 4th grade students in MVSD as well as an MVMS alumi myself to provide my public comment on the draft EIR for MVMS Modernization Project. I urge the board to select the option to remodel and modernize the existing MVMS campus rather than proceeding with a new build at the Lomita Avenue site.

While I appreciate the district's goal to provide an updated learning environment, the costs and community impacts associated with building a new facility at Lomita are simply not justifiable. As we have seen, the soil mitigation costs for the existing site were significantly underestimated, raising serious concerns about the financial feasibility of the new construction. Opting for a remodel is a more fiscally responsible approach and protects our community from potential cost overruns.

Furthermore, a new middle school at Lomita Avenue, co-located with Edna Maguire Elementary, would create substantial and disruptive neighborhood impacts. Increased traffic congestion, reduced student safety due to heavier vehicle flow, and a general decline in the quality of life for residents near Lomita are serious concerns that a remodel of the existing campus would largely avoid. The displacement of West America Tae Kwon Do &

Aftercare which has served as a longstanding gem for our community is at risk and will impact both children and parents who rely on the aftercare which is scare resource in Mill Valley.

The draft EIR notes that a renovation might not meet all project objectives. However, a thoughtful, comprehensive remodel that is fiscally responsible and less impactful on our neighborhoods is a more prudent choice for the community as a whole. I trust that the board can work with the district to find a scope of work that provides students with a modern and safe learning environment without the significant drawbacks of the Lomita proposal.

Thank you for your time and consideration of my comments. I respectfully ask that you prioritize remodeling the existing MVMS campus as the best path forward for our students and community both in the near- and long-term.

Sincerely,

Sasha Noller

Parent to 8th grade (MVMS) and 4th grade (Tam Valley) students

Mill Valley Resident since 1980

Responses to Sasha Noller Comments

Please see Master Responses 1 and 2, above.

179. Max Perkoff Comments

From: **Max Perkoff** <perkoff.max@gmail.com>
Date: Fri, Sep 12, 2025 at 9:54 AM
Subject: Please don't displace West America Taekwondo
To: <jarroyo@mvschools.org>

Dear Mr. Arroyo,

I am writing to urge you not to require West America Taekwondo to move from their location next to Edna Maguire School during the District renovations – or any other time.

For 42 years WATKD has been a true pillar of the Mill Valley community. They have provided world class training of both mind and body for thousands of local students and adults, including me and our son Avi Perkoff, a graduate of the Mill Valley School District and Tam High. As a retired school teacher (MVSD & other Marin schools) and a 57 year Mill Valley resident, I can attest to the fabulous work and service WATKD provides our community.

Roger and Chantal Carlon (like their father before them) are internationally renowned teachers. Their dedication to a positive impact on the community is unparalleled.

I am also a 2011 Milly Award recipient. WATKD and their after school program are simply irreplaceable parts of the best of Mill Valley life. Please find an alternative to displacing them. Work with them and together I'm sure you can find an acceptable solution.

Thank you so much for your attention to this issue.

Very Sincerely Yours,

Max Perkoff

1972 Tam Valley School Graduate
1976 MVMS Graduate
1980 Tam High School Graduation
2nd degree black belt at WATKD

Responses to Max Perkoff Comments

Please see Master Response 2.

180. Susan Mumford Comments

From: **Susan Mumford** <susanamumford@gmail.com>
Date: Fri, Sep 12, 2025 at 9:16 AM
Subject: Please to keep the Taekwando space
To: <jarroyo@mvschools.org>
Please work wholeheartedly to keep the Tailwando space at its current location.
So many children have benefited from this wholesome program – the location is perfect as it is -
My grandchildren have been attending classes for several years-
My family would be so disappointed if it closed and relocated-
Susie Mumford

Response to Susan Mumford Comments

Please see Master Response 2.

181. Seneca Gupta Comments

From: **Seneca Gupta** <seneca.mg@gmail.com>
Date: Fri, Sep 12, 2025 at 7:35 AM
Subject:
To: <jarroyo@mvschools.org>

Dear Mill Valley School District Board,

I strongly urge you not to displace West America TKD & After Care from its Lomita Dr. location. For 42 years, this dojo has been more than a building—it's been a safe, supportive community where children and families learn discipline, confidence, and respect.

Losing this space would disrupt a legacy that has shaped generations. Please find a solution that allows the middle school renovation to move forward without forcing West America from the home it has built with this community.

Thank you for your consideration.
Sincerely,

Seneca Gupta

Response to Seneca Gupta Comments

Please see Master Response 2.

182. Heidi Arkinstall Comments

From: **Heidi Arkinstall** <heidi.arkinstall@gmail.com>
Date: Thu, Sep 11, 2025 at 2:18 PM
Subject: Please Keep West America TKD in Its Home
To: <jarroyo@mvschools.org>

Dear Mill Valley School District Board,

I strongly urge you not to displace West America TKD & After Care from its Lomita Dr. location. For 42 years, this dojo has been more than a building—it's been a safe, supportive community where children and families learn discipline, confidence, and respect.

Losing this space would disrupt a legacy that has shaped generations. Please find a solution that allows the middle school renovation to move forward without forcing West America from the home it has built with this community.

Thank you for your consideration.
Sincerely,

Heidi Arkinstall

Parent of MVMS Student who is also a student at West American TKD

Responses to Heidi Arkintall Comments

Please see Master Response 2.

183. Erica Desai Comments

From: **Erica Desai** <erich611@gmail.com>
Date: Thu, Sep 11, 2025 at 2:12 PM
Subject: Opposition to Building a New Middle School at Edna Maguire
To: <jarroyo@mvschools.org>

Dear Trustees and Julio,

I am writing to respectfully share my strong opposition to the proposed alternative of building a new middle school at the Edna Maguire Elementary site.

The district itself has already identified a number of critical challenges associated with using 70 Lomita as the site, including:

- **Displacement of current tenants**: I am putting this at the top of the list because, frankly, this is where it belongs. West America Tae Kwon Do is not just another tenant leasing space—it is a cornerstone of our community. Since 1983, it has provided a safe, supportive environment where children learn discipline, confidence, and respect, while parents watch in amazement as their kids transform before their very eyes. Its outstanding aftercare program has been a lifeline for working parents, offering a trusted blend of structure, enrichment, and care. Losing this space would not only disrupt daily routines for countless families, including mine, but also dismantle a legacy that has shaped generations in Mill Valley. On a personal note, I consider our relationship with West America to be one of my family's greatest blessings.

- **Insufficient acreage**: The site does not meet California Department of Education guidelines for a middle school campus, raising serious concerns about safety, facilities, and long-term adequacy.

- **Inability to handle projected enrollment increases**: If the campus cannot scale with anticipated growth, this solution risks being both short-sighted and costly.

- **Loss of a centralized campus location**: Locating the middle school at the edge of the district will make access more difficult for many families, increasing inequities in commute times and access.

- **Increased city-wide traffic congestion**: The addition of middle school drop-offs and pick-ups to an already busy corridor will exacerbate traffic and safety risks for students, families, and neighbors.
- **Negative impacts on the Edna Maguire community**: Adding a middle school would significantly disrupt the existing elementary school environment, crowding facilities and diminishing the experience for younger students.

These are not minor drawbacks; they represent fundamental flaws that could compromise the safety, accessibility, and quality of education and care for both middle and elementary students, as well as the broader Mill Valley community.

Thank you for your consideration and your ongoing commitment to our schools.

Sincerely,

Erica Desai

9 Azalea Dr.
Parent to students in TK and 1st grade at Edna Maguire

Responses to Erica Desai Comments

Please see Master Responses 1, 2, 3, and 4.

184. Kate Ellison Comments

From: **Kate Ellison** <katemellison@gmail.com>
Date: Thu, Oct 9, 2025 at 10:13 AM
Subject: MVMS Modernization project
To: <jarroyo@mvschools.org>

Dear Julio,

I hope you're doing well. My name is Kate Ellison, and I'm the parent of a current 3rd grader and Kindergartener at Edna Maguire. I know that the Board will be making a decision soon in regards to the MVMS modernization, and I'm writing to express my opinion not only as a parent of children that will be affected by this project, but also as a member of the greater Mill Valley community.

The most rational, safe, and responsible option is to renovate MVMS at the existing site AND to temporarily house the entire 6th-8th grade student population in portable classrooms at the existing Sycamore location.

I feel confident that the results of the EIR clearly demonstrate that renovating the existing middle school and placing temporary student housing in portables on site is SAFE and that appropriate steps will be taken to mitigate any potential hazards to the students during construction.

I am VERY concerned about and opposed to the proposed alternative options that include either a) building a new middle school at or next to the existing Edna Maguire campus and b) temporarily housing all or some of the 6th-8th graders at or next to the Edna campus during the years-long construction. Either of these proposed options would cause significant upheaval and disruption for the students, teachers, and staff of Edna Maguire. Edna underwent a major renovation that was just completed in 2014, and our school community should not have to undergo another major disruption.

In addition to being an Edna parent, I also live in the Alto-Sutton neighborhood. Building a new middle school at 70 Lomita or building temporary student housing at this site would cause Lomita Drive and the surrounding neighborhood to be flooded with excessive traffic. Adding hundreds of students to the site would further exacerbate the bottleneck traffic that already occurs on Lomita daily. Renovating the existing middle school building maintains a central location that continues to support students walking and biking to school.

The current middle school sits on a ~14 acre site. The 70 Lomita site is ~4 acres, which is simply not enough space to house a new middle school. Renovating the existing school leverages the largest acreage available, and is the most appropriate site for a middle school design. Additionally, during Edna Maguire's previous renovation, cultural remains of the Coast Miwok tribe were discovered, and a 2025 study confirmed the archaeological significance of this site. Beginning new construction near Edna risks further discoveries that could halt the project and cause further significant delays.

I am strongly urging you to renovate the existing MVMS site and to temporarily house all middle school students in temporary classrooms at the Sycamore site during construction. This is the most rational choice for our students and for the Mill Valley community as a whole.

Thank you,

Kate Ellison

Responses to Kate Ellison Comments

Please see Master Responses 1, 3, and 4.

185. David Toomey Comments

From: **David Toomey** <dtoomey70@gmail.com>
Date: Thu, Oct 9, 2025 at 1:01 PM
Subject: Formal Objection to the Selection of 70 Lomita Drive for the Mill Valley Middle School Modernization Project and Notice of Unsafe Conditions
To: <jarroyo@mvschools.org>, <ekaufman@mvschools.org>, <snakatani@mvschools.org>, <nkatz@mvschools.org>, <eabdoli@mvschools.org>, <mcrncichhodge@mvschools.org>, <yyoo@mvschools.org>, <sburke@cityofmillvalley.gov>, <ucarmel@cityofmillvalley.gov>, <cityclerk@cityofmillvalley.gov>, <planning@cityofmillvalley.gov>, <pkelly@cityofmillvalley.gov>, <Mary.Sackett@marincounty.gov>, <Eric.Lucan@marincounty.gov>, <BOS@marincounty.org>, <bcrawford@marincounty.org>, <tlai@marincounty.org>, <CDA_Planning_Counter@marincounty.org>, <planningcommission@marincounty.gov>

Dear Mayor Burke, Councilmembers, President Sackett, Superintendent Kaufman, Supervisors, President Nakatani, Director Arroyo, and Trustees,

My name is David Toomey, and I am a resident of Lomita Drive. I am writing on behalf of myself and a growing number of concerned residents in the Alto neighborhood to formally and strenuously object to the consideration of the 70 Lomita Drive site for either a temporary or permanent Mill Valley Middle School campus.

This email, with the attached signed letter to follow via mail, serves as a formal comment on the Draft Environmental Impact Report (EIR) for the Mill Valley Middle School Modernization Project. It also provides actual notice to the Mill Valley School District, the City of Mill Valley, and the County of Marin of the unsafe conditions this project would create and our intent to pursue all available legal remedies, including injunctive action, should it proceed.

While we fully support providing students with a safe, modern learning environment, the selection of the 70 Lomita Drive site is untenable. The project, as proposed, is inconsistent with the governing City and County General Plans and would knowingly create a dangerous condition of public property that endangers students, residents, and the public.

- **The Project Conflicts with City and County General Plans**

Under California law, a city's General Plan is the "constitution for all future development." (Lesher Communications, Inc. v. City of Walnut Creek (1990) 52 Cal.3d 531.) Every public project must be consistent with its adopted policies. This project violates foundational principles in both the Mill Valley MV2040 General Plan and the Marin Countywide/Transportation Plans.

Mill Valley MV2040 General Plan:
A core community value of the Plan is to *"Minimize traffic congestion and encourage safe and convenient mobility alternatives."* (MV2040 Plan, Community Values, City of Mill Valley.) Its Mobility Element is grounded in this principle. Introducing the traffic equivalent of a 1,100-student campus twice daily into a geographically constrained neighborhood, already a bicycle transitway with limited egress, directly contravenes this objective.

Marin Countywide/Transportation Plan:
The County recognizes the limited potential to expand roadway capacity and emphasizes multi-modal travel and connectivity instead. (*Transportation Authority of Marin, Countywide Transportation Plan 2050*.) Funneling thousands of daily vehicle trips into a two-outlet residential network that feeds the congested East Blithedale corridor contradicts that strategy and undermines regional mobility goals.

- **The Project Would Create a Foreseeable "Dangerous Condition"**

The Draft EIR acknowledges that the project will increase traffic volumes and delay but concludes that Vehicle Miles Traveled (VMT) and geometric design impacts are "less than significant" under CEQA (Draft EIR §§ 3.10.1–3.10.3). This finding is significant for environmental legal purposes, but it is not dispositive regarding safety concerns and the creation of a dangerous condition on public property. By certifying this EIR and moving forward with the proposal, the District, City, and County would be on actual notice of the increase in traffic volumes caused by the project and the correlated creation of serious safety risks and anticipated harms. By proceeding without adequate remediation, it would amount to knowingly creating a dangerous condition of public property under the California Tort Claims Act (Gov. Code § 830 et seq.), potentially exposing all public entities to liability.

The danger is magnified by the Alto neighborhood's physical and infrastructure constraints:

- **Limited Ingress/Egress:** The Alto neighborhood functions effectively as a large cul-de-sac, with only two exits onto the gridlocked East Blithedale corridor, creating a traffic trap during peak or emergency conditions.

Inadequate Emergency Access: The Mill Valley Municipal Code (Title 21.08 – Streets and Blocks) discourages long cul-de-sacs without adequate emergency access provisions. Adding over 1,500 new daily trips would immobilize this network, impeding fire and evacuation routes during wildfires or disasters.

Existing Infrastructure Deficiencies: The neighborhood lacks continuous sidewalks, ADA ramps, adequate crosswalks, and sufficient lighting or parking. The County's own CEQA filing (2025) Identifies "sidewalk gaps along Lomita Drive," confirming the area's current inadequacy for additional pedestrian or vehicular load.

- **Degradation of a Regional Active Transportation Corridor**

Lomita Drive connects directly to the Mill Valley Sausalito Pathway at East Blithedale and forms part of an established regional bicycle and pedestrian corridor between Mill Valley and Corte Madera. The Transportation Authority of Marin's Countywide Bicycle Network Map designates this corridor for active transportation use.

Placing a major traffic generator directly on this route contradicts the City's and County's mobility policies and endangers non-motorized users. The East Blithedale/Lomita intersection already experiences high bicycle and pedestrian volumes and operational strain documented in the City's East Blithedale Avenue Corridor Improvement materials, conditions that this project would exacerbate.

- **Community Frustration and Procedural Failures**

Residents who attended the District's information sessions have been frustrated by the lack of transparency and meaningful engagement. At one such meeting at Edna Maguire School, a Board member reportedly responded to traffic-safety questions with, *"That's something we're aware of and would have to solve,"* without offering residents a remediation plan that ensures public safety levels would remain at their current threshold. This is unquestionably an inadequate public-process response to foreseeable safety risks.

Moreover, notice to affected residents has been deficient. Many neighbors without school-aged children remain unaware of the proposal, often responding with, "Why weren't we told?" or "This isn't what we voted for."

A material change in circumstances has also arisen: the closure of the Whole Foods Market on Miller Avenue (September 2025) has redirected its traffic to the remaining

store at 731 East Blithedale Ave (Alto Center, at East Blithedale & Lomita). This shift increases peak-hour congestion precisely where school traffic will converge, rendering the Draft EIR's baseline data outdated and legally inadequate. A Supplemental EIR is therefore required.

- **Conclusion and Request for Action**

We respectfully urge the Mill Valley School Board to reject the 70 Lomita Drive alternative for the Middle School Modernization Project. We further urge the City of Mill Valley and the Marin County Board of Supervisors to oppose any permits or approvals facilitating it, based on its inconsistency with adopted General Plans and the unacceptable public-safety risks it presents.

Please include this letter in the official administrative record. If the Board nevertheless approves the 70 Lomita site despite these deficiencies, we are prepared to pursue all available legal remedies to protect our community. A signature-collection effort is underway to demonstrate broad neighborhood opposition to this unsafe and ill-conceived proposal.

Sincerely,

David Toomey

Responses to David Toomey Comments

There are existing schools on both the Project and Edna Maguire/Terra Marin sites, and both sites are zoned and designated in the applicable General Plans for schools. The comment's concern with respect to the alternative's general plan policy consistency is noted. Please note that as an independent government agency, the MVSD is not bound by local agency general Plan policies. Existing infrastructure deficiencies at the Edna Maguire School are part of the existing conditions, and not Project impacts. Traffic congestion on local roads and transit corridors is not a CEQA issue other than with respect to emergency access. Queuing at the access points on Lomita drive is addressed in Chapter 5 of the EIR. Please see Master Response 3 with respect to emergency access. The comments regarding community frustration with the site selection process is noted.

186. Peter Moeck Comments

From: **peter moeck** <pmoeck@yahoo.com>
Date: Fri, Oct 10, 2025 at 4:09 AM
Subject: Draft EIR Comment
To: ekaufman@mvschools.org <ekaufman@mvschools.org>, jarroyo@mvschools.org <jarroyo@mvschools.org>
Cc: cboc@mvschools.org <cboc@mvschools.org>, jarroyo@mvschools.org <jarroyo@mvschools.org>

To Whom it may concern,

I am Mill Valley parent and local profession Civil Engineer. I am concerned about the health and safety of students and teachers given the site's documented contamination.

Please complete the soil tests and mitigation plans before finalizing a decision. At a minimum the Edna Maguire site should be further explored as a safter and more cost-effective and long term solution.

The district should not approve a project before evaluation by professionals to check what would be involved to bring the site up to seismic and environmental safety standards and meet current building code requirements. There will likely still concrete work for seismic which would involve soil drilling and/or excavation that will potential disturb and expose contaminated soil.

As a local professional Civil Engineer, parent, and taxpayer, I want to see the money used wisely on a lasting safe facility.

Declining enrollment numbers do no support the 2021 master plan analysis that eliminates the consideration of the Edna Maguire site for a middle school.

Thank you,

Peter Moeck, P.E.

Responses to Peter Moeck Comments

Extensive soils testing at the Project site has been conducted and is under review by the California Geological Survey on behalf of the Division of the State Architect, which is responsible for review and approval of all school construction projects. Issues associated with handling of contaminated soil are addressed in the hazards and Hazardous Materials chapter of the EIR.

With respect to Alternative 5, the renovations would include a vapor intrusion mitigation system (VIMS) to prevent soil vapor hazards inside the building. Seismic hazards would be similar to existing conditions. The Field Act was introduced in 1933 along with other laws that banned the construction of unreinforced masonry buildings, and required that earthquake forces be taken into account in structural design. The Act also established the Office of the State Architect (now Division of the State Architect or DSA) which developed design standards, quality control procedures, and required that schools be designed by registered architects and engineers. These professionals must submit their plans and specifications to the State Architect for review and approval prior to construction. The same professionals were also required by the Act to periodically inspect the construction while underway and verify that the actual work completed is in compliance with the approved drawings. Peer review and inspection requirements were also introduced as another quality control procedure.

Since 1940, no building constructed under the Field Act has either partially or completely collapsed, and no students have been killed or injured in a Field Act compliant building. As such, to guide renovation of the buildings designed under Field Act requirements, the California Administrative Code establishes the 50% replacement cost threshold for the evaluation and retrofitting of structural systems as noted below. Additionally, this requirement can be triggered when seismic weight or wind loads are increased by more than 10% from the original construction and/or impacts on the lateral force resistance of more than 10% due to modifications to the structure. The renovation proposal for Mill Valley Middle School would not exceed that 10%.

With respect to the seismic safety of the Interim Campus at the MVMS site, the proposed foundation design has been reviewed by the California Geological Survey on behalf of the State Architect and determined to be appropriate to address seismic hazards including settlement and liquefaction[12].

[12] California Department of Conservation, California Geological Survey, Letter to Elizabeth Kaufman, Superintendent, Mill Valley School District, November 12, 2025, *Second Engineering Geology and Seismology Review for Mill Valley Middle School - Proposed Interim Campus. 425 Sycamore Street, Mill Valley, CA*. CGS Application No. 01-CGS6942.

187. Mill Valley Middle School Modernization Mess Comments

(Comment letter begins on the following page)

MVMS Modernization Mess
an association of concerned parents
mvmsmodernizationmess.com | mvmsmodernizationmess@gmail.com

Public Comment on the Mill Valley Middle School Environmental Impact Report

October 9, 2025

VIA EMAIL

To:

Elizabeth Kaufman, Superintendent
ekaufman@mvschools.org
Julio Arroyo, Director of Maintenance and Operations
jarroyo@mvschools.org
Mill Valley School District
411 Sycamore Avenue
Mill Valley, CA 9494

Cc:

- John A. Carroll, Marin County Superintendent of Schools, superintendentsoffice@marinschools.org
- Citizen's Bond Oversight Committee, cboc@mvschools.org
- Lee Bryant, Greg Pirie, and Tara Efrain, County Environmental Health Services, lbryant@marincounty.org; gpirie@marincounty.org; tefrain@marincounty.org
- Peter Ruttan and Tim Crick, Department of Toxic Substances Control, School Site Mitigation and Restoration Program, Peter.Ruttan@dtsc.ca.gov; Tim.Crick@dtsc.ca.gov
- Juan Mireles, California Department of Education, juan.mireles@cde.ca.gov
- Yana Garcia, California Environmental Protection Agency, Yana.garcia@calepa.ca.gov
- Ida Clair, California State Architect, ida.clair@dgs.ca.gov
- Arlene Nuñez, California Geological Survey, cgs_review@conservation.ca.gov
- Stephanie Young and Dawn Laing, CalRecycle, stephanie.young@calrecycle.ca.gov; dawn.laing@calrecycle.ca.gov
- Sara Jones and Chris Choo, Community Development Agency, sjones@marincounty.org; CChoo@marincounty.org
- Larry Goldzband, San Francisco Bay Commission and Development Commission, larry.goldzband@bcdc.ca.gov
- Keith Robertson and Alan Friedman, SF Bay Regional Water Quality Control Board, keith.robertson@waterboards.ca.gov; alan.friedman@waterboards.ca.gov
- PTA Council, ptacouncil@mvschools.org
- Community Financial Advisory Committee (CFAC), cfac@mvschools.org
- Jessica Newman, Executive Director, Kiddo, jnewman@kiddo.org

MVMS Modernization Mess
an association of concerned parents
mvmsmodernizationmess.com | mvmsmodernizationmess@gmail.com

Dear Dr. Kaufman and Mr. Arroyo:

I. Executive Summary

This letter provides detailed comments regarding the Draft Environmental Impact Report ("Draft EIR") for the Mill Valley Middle School ("MVMS") Modernization Project. The community remains deeply concerned about the project's environmental, fiscal, and safety implications. In summary:

- The original, now discarded, rebuild project analyzed in the Draft EIR is no longer financially feasible because of well-documented issues with soil toxicity at the site. Instead of conducting an initial feasibility analysis for a few hundred thousand dollars, the District spent more than 3 years and approximately $6 million dollars planning for a project that was not realistic considering expected mitigation needs.
- The Draft EIR fails to provide an accurate project description or meaningful analysis of the renovation option now under consideration with only three-and-a-half pages of analysis, one of which is a picture.
- Proceeding before completion of the Preliminary Endangerment Analysis ("PEA") process violates CEQA requirements and frustrates informed public review. (1)
- The EIR improperly rejects and never seriously studies feasible alternatives, such as relocating MVMS to the Edna Maguire site, based on outdated student enrollment data. There are 377 Edna students that could be redistributed to the four existing elementary schools. The traffic at Edna was originally studied, and approved, for 679 students. MVMS currently has 697 students, so that is comparable and feasible. This is worth exploring because the Edna site would be (1) **safer**: free from the liquefaction zone, flooding, contamination, and smell, (2) **less disruptive**: no students would have to move mid-year or learn amid construction noise, and (3) **more sustainable**: no sea level rise "island" effect and no concern about the waning useful life of a 1970s building.
- The District is proposing to spend $130 million, or $1,406 per square foot, for a remodel with a limited useful life by not addressing known flooding and seismic issues, since $38 million – or 29% of the budget! – is being dedicated to toxic soil removal ($19.2 million) and temporary housing ($18.7 million), all of which could be expended on more durable enhancements at the Edna site, making that option far **more cost-effective.**
- The District's timeline is unrealistic and risks fiscal mismanagement.

We respectfully urge the District to withdraw and revise the Draft EIR to ensure compliance with CEQA, promote transparency in project planning, and secure the long-term safety and sustainability of Mill Valley schools.

II. Introduction

The Draft EIR fails to address community concerns related to the environmental, financial, and safety implications of the MVMS modernization project. It also fails to meet the basic requirements of the California Environmental Quality Act ("CEQA"), Pub. Res. Code § 21000 et seq.

As discussed in detail below, the Mill Valley School District has acknowledged that the "proposed project" analyzed in the Draft EIR – a complete rebuild of the MVMS campus – is no longer financially feasible. It is confusing, even within this letter, to discuss the EIR's "proposed project" because that is now a discarded project that is no longer proposed at all. To ensure this letter is not as confusing as the EIR, we will refer to that erstwhile rebuild project as the "Discarded Rebuild Project."

2 The District must now, of necessity, turn to the alternatives identified in the EIR. However, the District cannot lawfully pursue the alternative it appears to favor – a renovation of the current building – on the basis of this Draft EIR. The Draft EIR is fundamentally misleading because it does not clearly identify or adequately analyze the version of the project the District apparently wants to build. The EIR is also inadequate because the District is rushing to approve the project before it has sufficient information about the health and safety risks associated with the existing site and the scope and cost of the mitigation necessary to reduce those risks. Thus, the District's currently favored renovation alternative, like the Discarded Rebuild Project misleadingly analyzed in the Draft EIR, may well turn out to be environmentally and financially infeasible. Unfortunately, the District may not even know that until after it has approved the project.

This rush to approval, before critical information is available, violates CEQA. It is also both fiscally and environmentally irresponsible. The District needs to consider all of the relevant facts and seriously look at alternatives that will not risk the health and safety of students and staff or the District's own fiscal viability. Once it has done so, the District must revise and recirculate the Draft EIR so that the community can understand and provide meaningful input on the environmental and financial impacts of the project that the District is actually proposing to approve and build.

III. Infeasibility of the Discarded Rebuild Project

The District has acknowledged that the Discarded Rebuild Project is no longer financially feasible. At the August 14, 2025 School Board meeting, the District presented the following budget trajectory, which we are attaching as Exhibit A:[1]

- **Sept. 2023:** Board set a $130 million target budget.
- **Sept. 2024:** Cost estimate increased by $22.6 million when pier foundations were replaced with deep soil mixing to address lateral spread and liquefaction.
- **Sept. 2024:** "Value engineering" reduced project size to $134 million.
- **June 2025:** Additional $23 million in projected toxic soil removal costs identified.
- **July 2025:** Budget ballooned to $156 million and project declared infeasible.
- **Aug. 2025:** District began considering alternatives with a target budget for hard costs of $95 million and an estimated $130 million [2] including soft costs and contingency (including $19.2 million for soil removal[3] and $18.7 million for temporary housing[4]).

3

In total, toxic soil removal and geotechnical mitigation with the rebuild was projected at $32.4 million, nearly one-quarter of the entire budget and far above the $7.8 million originally set aside.[5] We repeatedly cautioned the District that costs would approach $33 million based on comparable San Diego projects. Our warnings proved accurate, but went unheeded.

The Discarded Rebuild Project collapsed because the District rushed ahead without methodically considering the threshold issues that would make or break that plan. The District knew that the soil was toxic before the Measure G Bonds were even passed and that soil *mixing* would be required as early as 2024, so why did it not ask the Department of Toxic Substances Control ("DTSC") or even its own consultants earlier, first thing even, if soil *removal* might also be

[1] Mill Valley School District, School Board meeting deck, August 14, 2025, *available at* https://www.mvschools.org/89534_3 [as of Oct. 9, 2025]. The District is now only posting very abbreviated School Board meeting "highlights", along with full-length meeting videos, which require a viewer to wade through hours of footage, making it difficult to access this public information. To facilitate review, we are thus attaching the August 14, 2025 Board deck to this letter as Exhibit A. We downloaded this before the District revamped its website making the information harder to locate.
[2] *Id.* at p. 4.
[3] *Id.* at p. 5.
[4] *Id.* at p. 9.
[5] Measure G Board of Trustees Meeting, AECOM presentation deck, January 11, 2024, p. 32, *available at* https://static1.squarespace.com/static/668c4a0dd9348c745c994ccf/t/67106852d096722216bbc134/1729128536194/Measure+G+January.pdf [as of Oct. 9, 2025].

required? That shoe finally dropped in the Summer of 2025. In a report titled, "Mill Valley Middle School Reconstruction Hazardous Soil Volumetric Analysis" prepared by Flint on June 6, 2025, attached hereto as Exhibit B, the District's consultants explained that soil removal would indeed be required, defining a term called the *3' Clean Cap Requirement*, which is "a minimum 3-foot vertical buffer of clean soil between finished grade and any underlying contaminated material…***consistent with standard* DTSC mitigation guidance for school sites**" (emphasis added). If this is a known DTSC standard, it is baffling that it took so long to prepare this report, which finally "quantifies the anticipated scope, cost, and environmental compliance implications of hazardous soil removal at Mill Valley Middle School," something we had been requesting for over a year. The report explains that the new analysis was "initiated in response to updated PEA findings" (page 9).

3 (cont.)

While questions about soil removal lingered, the District could have held off on the detailed architectural drawings, the tense community meetings, and even the EIR until it had an answer to that essential question. Breezing past this crucial threshold issue had serious financial implications. As of March 2025, the District has spent approximately $6,014,866.80 on the Discarded Rebuild Project, comprised of $2,902,181.00 for MVMS site planning (including $1,944,489.88 on architect fees),[6] plus another $325,000.00 on architect fees for the interim campus,[7] plus $2,787,685.80 for AECOM's construction management services,[8] some of which is allocable to the elementary sites, but most of which is allocable to MVMS.

Unfortunately, the District proceeded before it had all the relevant information. Chaos and confusion resulted, and it is about to repeat this same mistake. Given that the District has already had to make a major project shift due to new PEA findings, it would certainly be wise to actually finish the PEA process before rushing to approve the next alternative.

IV. The Draft EIR's Inaccurate Project Description Renders the Entire Document Fundamentally Misleading and Inadequate.

4

An EIR must contain an accurate, stable, and finite project description.[9] Such a project description "is the sine qua non of an informative and legally sufficient EIR."[10] A project description that gives "conflicting signals to decisionmakers and the public about the nature and

[6] Citizens Bond Oversight Committee Meeting, Fiscal Year 2024-25 Financial Update, "Expenditure by Category and PO March 2025 (1)," April 23, 2025, *available at* https://simbli.eboardsolutions.com/SB_Meetings/ViewMeeting.aspx?S=36030331&MID=38805&Tab=Agenda&enIID=FG86plusHyU72fPNlrrCkGUXw%3D%3D, p. 2 [as of Oct. 9, 2025].
[7] *Id.*
[8] *Id.* at p. 5.
[9] *County of Inyo v. City of Los Angeles (1977)*, 71 Cal. App. 3d 185, 199.
[10] *Id.* at p. 193.

scope of the activity being proposed . . . [is] fundamentally inadequate and misleading."[11] In other words, "A curtailed, enigmatic or unstable project description draws a red herring across the path of public input."[12]

Unable to advance the Discarded Rebuild Project, the District has now shifted focus to two alternatives: (1) renovation of the existing MVMS campus, including upgrades and a new STEM building, as described in the EIR (the "Renovation Option"); and (2) construction of a new middle school at 70 Lomita Avenue (the former Terra Marin site), co-located with Edna Maguire Elementary (the "Dual-Schools Option"). The Draft EIR devotes hundreds of pages to the Discarded Rebuild Project, while allocating only a few cursory pages to the alternatives now under consideration. The Renovation Option that the District wants to approve, based on the analysis in this EIR, is discussed over the course of a mere three-and-a-half pages, one of which is a full-page picture that hardly counts. That is patently absurd and wholly inadequate given the scale and complexity of this project. Moreover, the District is, once again, rushing ahead before answering the next set of crucial threshold questions.

4 (cont.)

In the *Washoe Meadows* case, the Court of Appeal found that an EIR that discussed a range of alternatives – each of which had distinct impacts and would require different mitigation measures – without clearly identifying and analyzing a single proposed project is inherently misleading and unstable.[13] Here, the District has already rejected the proposed project identified in the Draft EIR. What remains of the Draft EIR therefore suffers from the same flaw as the EIR in *Washoe Meadows*. Absent a clearly identified proposed project, the EIR effectively examines only a range of inadequately defined alternatives. The EIR thus does not provide sufficient analysis of environmental impacts, mitigation measures, or feasibility to support informed decision-making and public review regarding *any* of the remaining alternatives, each of which is described in only a few cursory pages. If anything, this Draft EIR's project description is even more misleading than the description in *Washoe Meadows* because it fails to disclose that the proposed project it *does* identify is no longer the project the District proposes to build.

The District cannot rely on the Draft EIR to approve the Renovation Option because it is not described in sufficient detail or with sufficient certainty to meet CEQA's standards. The exact contours of the Renovation Option remain ill-defined and seem to be continuously shifting. For instance, we recently learned at a community meeting that the proposed STEM building has now been abandoned due to the same soil mitigation issues that doomed the Discarded Rebuild Project.

[11] *San Joaquin Raptor Rescue Center v. County of Merced* (2007) 149 Cal.App.4th 645, 655–656
[12] *County of Inyo*, *supra*, 71 Cal.App.3d at p. 198.
[13] *Washoe Meadows Community v. Dept. of Parks and Recreation* (2017) 17 Cal.App.5th 277, 288-289.

In the three-and-a-half pages about the Renovation Option, the EIR does not say what will happen to the current building's foundation, whether any upgrades are advisable, required, or financially feasible. The EIR goes on at some length about the severe seismic liquefaction risk at the site,[14] but it then punts on the implications for the Renovation Option. The EIR says only, "This alternative would renovate the existing building *and possibly the foundations* to meet current building code seismic requirements."[15] We have heard conflicting things at subsequent community meetings. At one, the Superintendent said the 1970s foundation would be left as-is, meaning the project would not meet current building code seismic requirements at all. At another, she said that of course seismic safety would be taken seriously, but she stopped short of saying what that would actually involve or how much it would cost. The District's FAQs, posted on its website after the release of the Draft EIR, say that "Ultimately, California Geological Services and the Department of the State Architect will decide whether deep soil mixing is required [for seismic stabilization], using the best available science and applicable regulations to ensure the safety of students and staff."[16] Those agencies have not yet reviewed the renovation plan, so the District does not know what those agencies might require. Seismic safety is an important planning consideration for a school, both for safety and fiscal feasibility, and the public deserves to know the plan, or the extent to which there is actually no seismic strengthening plan at all, as the case may be.

5

Similarly, the three-and-a-half pages about the Renovation Option also fail to describe whether and to what extent the Renovation Option would disrupt the soil cap that currently protects students and staff from the hazardous contaminants in the burn dump underlying the current site. The EIR does not say what the implications would be for the anticipated level of disruption. The EIR offers only vague, conclusory assertions, such as, "This alternative would involve some construction within the former landfill underlying portions of the existing school, although less disturbance would occur than under the Proposed Project. The interim campus would be exposed to some potential dust and emissions hazards, but these would be reduced compared with the proposed Project due to the substantial reduction in earth disturbing activities."[17] The qualitative description "some" is not sufficiently precise to inform parents or the District itself of the extent of possible hazards under this option, particularly for students and staff at the proposed temporary campus next door. What soil cap disruption would be necessary? Would the new

6

[14] The EIR describes the severity of the seismic hazards: "Results of the geotechnical investigation performed by Ninyo & Moore in 2024 indicate that settlement under new loads is a consideration due to the undocumented fill and soft bay mud encountered at the Site. Portions of the Site are susceptible to liquefaction, lateral spreading, and settlement under new loads." (EIR, p. 52 [PDF pagination]).
[15] *Id.* at p. 266 [PDF pagination].
[16] District FAQs, *available at* https://files.smartsites.parentsquare.com/5178/mvms_faqs_9262025.pdf [as of Oct. 9, 2025].
[17] EIR p. 267 [PDF pagination].

shade structures require soil cap disruption? Simply stating that the Renovation Option's impacts might be "reduced" in comparison to those of a project the District now has no intention of pursuing does not adequately inform the public or the District as to what the actual project's impacts might be. Indeed, it appears the District does not even know, because the characteristics of the Renovation Option itself keep shifting.

6 (cont.)

V. The Draft EIR Fails to Disclose, and Propose Adequate Mitigation for, Hazards Related to the Existing School Site

The Draft EIR's analysis of and proposed mitigation for hazards associated with the current site are inadequate because the District is rushing the process before it has the information necessary to comply with CEQA and make informed environmental and financial decisions.

The EIR is quite unusually proceeding *before* DTSC has completed its independent environmental analysis, as part of the required 3-Step Preliminary Endangerment Analysis ("PEA") process.[18] The District is only on Step 2 of that process. In Step 1, it stipulated that the current site contains contaminants, so it moved to Step 2, which is to complete soil and soil vapor testing, which will then be documented in the final PEA. The sampling is still underway, and the PEA is still in draft form. The EIR projects confidence about soil results and mitigation, but it misses the mark by citing an earlier version of the PEA, which does not reflect the results of subsequent sampling or an updated risk assessment based on that new data, as that entire process is still underway. Since the PEA is not yet final, the District has not even begun Step 3, which is to develop a Removal Action Work Plan or Remedial Action Plan, the details and costs of which are as-yet wholly unknowable.

7

Rather than wait until it has sufficient information to disclose and formulate mitigation for these impacts, the District is punting the entire analysis and mitigation process until *after* approval of the project. This is unlawful. An EIR is inadequate as an informational document if its suggested mitigation measures fail to meet CEQA standards or are so undefined that it is impossible to evaluate their effectiveness.[19] The District may not use the inadequacy of its impacts review to avoid mitigation: "The agency should not be allowed to hide behind its own failure to collect data."[20] Moreover, "[m]itigation measures must be fully enforceable through permit conditions, agreements, or legally binding instruments."[21] The formulation of mitigation measures may not be improperly deferred until after Project approval absent specific performance standards and

[18] DTSC, Site Mitigation & Restoration Program: 3-Step Process", *available at* https://dtsc.ca.gov/3-step-process/ [as of Oct. 9, 2025].
[19] *See King and Gardiner Farms, LLC v. County of Kern* (2020) 45 Cal.App.5th 814, 866; *San Franciscans for Reasonable Growth v. City and County of San Francisco* (1984) 151 Cal.App.3d 61, 79.
[20] *Sundstrom v. County of Mendocino* (1988) 202 Cal.App.3d 296, 306.
[21] CEQA Guidelines § 15126.4(a)(2).

concrete commitments to defined mitigation actions.[22] A conclusion that mitigation will reduce impacts to a less-than-significant level must be supported by substantial evidence.[23]

Here, the District proposes to select and approve its favored alternative *before* the PEA and accompanying Mitigation Plan are finalized. A proposed schedule on the District's website states that the Final EIR will be certified and the project approved in December 2025. The District also anticipates a "Final PEA" in December 2025. But the Final Mitigation Plan for whatever project the District intends to pursue will not be ready until April 2026.[24]

7 (cont.)

This schedule is both unrealistic and inadequate. As discussed above, the District has released only a draft PEA, and DTSC is requiring additional soil vapor samples, as shown in the correspondence between the District and DTSC, attached hereto as Exhibit C.[25] The EIR incorporates soil measurements from a prior version of the PEA, so it does not reflect the current data or health hazard information. In addition, the Health Risk Assessment attached as Appendix E to the Draft EIR has not yet been updated to include the most recent soil sampling results and has not yet been approved by DTSC.[26] The Health Risk Assessment included with the Draft EIR for public comment is therefore already out of date and insufficient to inform either the community or the District as to the project's real risks to students, teachers, and families.[27] Moreover, the DTSC-supervised Phase 3 Removal Action Work Plan or Remedial Action Plan

[22] *See King and Gardiner Farms*, *supra*, 45 Cal.App.5th at 857-60.
[23] *See id.* at 878-79.
[24] "Modernization Project Schedule," *available at* https://www.mvschools.org/facilities-modernization [as of Oct. 9, 2025].
[25] The District's consultant, Ninyo & Moore, submitted a Draft PEA Report to DTSC on April 8, 2025. On July 3, 2025, DTSC provided extensive – and highly critical – comments on the Draft PEA identifying significant problems with both sample collection and the overall health risk assessment in the Draft PEA Report. DTSC, Letter to Mr. Julio Arroyo, Mill Valley School District, Re: DTSC Review of Draft Preliminary Endangerment Assessment Report (July 3, 2025). Among other things, DTSC's letter identified concentrations of multiple toxic materials above significance thresholds and methane gas at "explosive" levels on the site. DTSC recommended additional soil gas sampling. Ninyo & Moore provided an "Addendum 2" to the Draft PEA Work Plan on August 22, 2025, outlining additional soil gas and indoor air sampling. On September 9, 2025, DTSC provided additional comments, identifying additional deficiencies in Ninyo & Moore's revised approach. DTSC, Letter to Mr. Julio Arroyo, Mill Valley School District, Re: DTSC Comments – Preliminary Endangerment Assessment Work Plan, Revision 2, Addendum 2 (Sept. 9, 2025). However, Ninyo & Moore apparently proceeded with additional sample collection on August 30 and 31, 2025, before receiving DTSC's comments. Letter from Ninyo & Moore to DTSC, Re: Response to Department of Toxic Substance Control's September 9, 2025 Comment Letter on Preliminary Endangerment Assessment Work Plan, Revision 2 Addendum 2 (Sept. 23, 2025). Copies of this correspondence are attached as Exhibit C.
[26] Ninyo & Moore, letter to DTSC, Sept. 23, 2025, at pp. 2-3 (describing Ninyo & Moore's proposal to revise the Draft PEA Report to include additional soil sampling and an "updated" Health Risk Assessment "and submit to the DTSC for review.").
[27] Perhaps the District is intending to include an updated Health Risk Assessment in a Final EIR. But at least one court has found that failure to circulate a Health Risk Assessment for public comment in a timely manner is a violation of CEQA. *King & Gardiner Farms*, *supra*, 45 Cal.App.5th at 895.

have not even begun. The District is thus asking for EIR review and approval before the scope of the project's environmental impacts are known or the scope of the required mitigation is discernable.

An EIR "should be prepared as early as feasible in the planning process to enable environmental considerations to influence project program and design and yet late enough to provide meaningful information for environmental assessment."[28] Here, the District does not yet have critical information that will determine the scope of the project and required mitigation. Proceeding on the basis of this premature EIR will have the effect of further locking the District into a plan of unknown scope, consequence, and feasibility. It is tantamount to "a study conducted after approval of a project" which meaningfully diminishes responsible decision-making and frustrates public input. Moreover, without knowing the cost of mitigation associated with the remaining on-site alternatives, the District cannot determine whether those alternatives are feasible, and thus cannot lawfully make the findings necessary under CEQA to approve one of those alternatives.

7 (cont.)

In addition to violating CEQA, the District is being fiscally reckless. It is proposing to spend $130 million (including hard and soft costs) on a 96,000 sq. ft. renovation, which amounts to $1,406 per square foot. Under normal circumstances, with a less challenging site, that price per square foot would yield high-end finishes and a seismically modern building. Unfortunately, what is being proposed here, at this same great expense, is a basic remodel with potentially no seismic retrofit. This is because this has always been the wrong site. The Renovation Option would be expensive, yet underwhelming, because the District would have to dedicate a projected $38 million – or 29% of the budget! – to toxic soil removal ($19.2 million) and temporary housing ($18.7 million),[29] all of which could be saved and spent on something more impactful and durable at another, safer, site. This is an expensive lipstick-on-a-pig proposal that leaves serious problems unaddressed.[30] The District cannot just sweep all of the project's environmental and financial problems under the rug in order to adhere to an unrealistic schedule.

8

VI. The EIR Improperly Rejects Reasonable Alternatives Based on Insufficient Evidence, Including Outdated Enrollment Projections

9

An EIR must "describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid

[28] CEQA Guidelines § 15004(a).
[29] Mill Valley School District, School Board meeting deck, August 14, 2025, attached hereto as Exhibit A.
[30] This adage is particularly apt, as this site regularly smells like a pigsty due to the sewage treatment plant, and what the District calls "smell days." In September 2025, the campus experienced what several students called "complete pandemonium" in their classrooms, when thousands of flies swarmed in after an uncapped waste incident at the sewer plant. The EIR concedes that the odor issue is "significant and unavoidable." (EIR, p. 19 [PDF pagination]).

or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. . . .[I]t must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation."[31] An EIR must therefore "include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project."[32]An EIR should also address whether "any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location," and if the agency concludes "no feasible alternative locations exist, it must disclose the reasons for this conclusion."[33] A finding that a particular alternative is infeasible must be supported by substantial evidence.[34]

9 (cont.)

The EIR rejects the idea of relocating the Middle School to the Edna Maguire site and dispersing the current Edna students to the District's four other elementary schools. However, in discarding this option as infeasible, the EIR relies on the 2024-25 enrollment *projections* set forth in the *2021* Master Facilities Plan (see footnote to EIR Appendix pdf page 307, which says "Note: student count from FMP projections for 24-25"). So, rather than looking at *actual* 2025 enrollment numbers or recent trends, the EIR travels back in time to 2021 to determine what people back then *thought* enrollment in 2025 *might* be. That is not a sound basis for analysis. The EIR's decision to reject this alternative based on outdated projections, rather than actual or updated enrollment data, is not supported by the evidence.

If we look at the actual enrollment numbers, and even other figures elsewhere in the EIR, the Edna Maguire option becomes easily feasible, as explained in detail in the materials from our website attached as Exhibit D to this letter and incorporated by reference.[35]

Briefly, the old 2021 projection indicates 617 Edna students.[36] The EIR then takes that outdated figure and uses it to say there would be about 150 Edna students added to the 4 other elementary sites under this option (for a total of 600 Edna students dispersed). That dramatically overstates how many students would actually need to be dispersed, as the actual Edna enrollment is 377 according to the District's latest enrollment update report.[37] Elsewhere, on its FAQ page, the District says there would be 428 students to disperse, with Old Mill taking 61, Park taking 79, Strawberry taking 104, and Tam Valley taking 154, at which point the District concludes this is

[31] CEQA Guidelines § 15126.6(a).
[32] CEQA Guidelines § 15126.6(d)
[33] CEQA Guidelines § 15126.6(f)(2)(A), (B).
[34] CEQA Guidelines § 15091(a)(3), (b).
[35] These materials are also *available at* https://www.mvmsmodernizationmess.com/other-ideas [as of Oct. 9, 2025].
[36] EIR Appendix, p. 307 [PDF pagination].
[37] Board Enrollment Update 2025-2026, dated August 28, 2025, *available at* https://static1.squarespace.com/static/668c4a0dd9348c745c994ccf/t/68c89998da9aa25603d52164/1757976984424/enrollment+25-26.pdf [as of Oct. 9, 2025].

9 (cont.) infeasible because that leaves 30 students undispersed.[38] That is a really small delta, and it is easily closed by using the latest and correct enrollment figure, which is 377, not 428, and certainly not 617. Elsewhere, the EIR even stipulates that the current Edna enrollment is "under 400,"[39] yet the EIR ignores this reality in rejecting this otherwise promising alternative. The EIR needs to use consistent and correct enrollment data.

10 The enrollment data also impacts the traffic analysis. The "Mill Valley Middle School Reconstruction Project Traffic Study" from August 2024, says the "current Edna Maguire student enrollment is 436" but it then says that its "Alternative A" (to move MVMS to Edna and disperse the Edna students) would "replace Edna Maguire School permanently with the 1,100-student middle school."[40] That is not an apples-to-apples comparison, as it compares ostensible-but-outdated *actual* Edna enrollment to the MVMS *max capacity* enrollment, which is nowhere near its actual enrollment of 697. If instead, we compare the MVMS actual enrollment of 697[41] to the *max capacity* enrollment for Edna – 679 students according to the 2021 Master Plan[42] – that means moving MVMS to Edna would add only about 18 more students than Edna is currently designed to accommodate. That number was already approved for the Edna site long ago, with all relevant traffic studies and neighborhood settlements, and that was before any new traffic mitigation plans, which would further mitigate the traffic. The traffic analysis should also look at the percentage of middle school vs. elementary school students that actually bike or walk to school.

11 In analyzing and approving the feasibility of the Dual-Schools Option, the EIR says "hours of classes for the two schools would be staggered by half an hour or 45 minutes to reduce traffic congestion. This would eliminate most of the [traffic level of service] degradation. It should be noted that the Marin County Department of Public Works is currently proposing a Renovation program for Lomita Drive that includes sidewalk extension and other roadway improvements that would improve the situation."[43] If the District believes, and the EIR concurs, that the traffic situation is thus viable with the *Dual-Schools* Option, then it is certainly viable with only MVMS at that Lomita site, particularly when the number of MVMS students is only slightly above the

[38] District Bond FAQs, *available at* https://www.mvschools.org/135135_3 [as of Oct. 9, 2025].
[39] EIR, p. 259 [PDF pagination]..
[40] "Mill Valley Middle School Reconstruction Project Traffic Study", PHA Transportation Consultants, August 2024, EIR Appendix, pp. 219 and 222 [PDF pagination].
[41] Board Enrollment Update 2025-2026, dated August 28, 2025, *available at* https://static1.squarespace.com/static/668c4a0dd9348c745c994ccf/t/68c89998da9aa25603d52164/1757976984424/enrollment+25-26.pdf [as of Oct. 9, 2025].
[42] Mill Valley School District Facilities Master Plan, 2021, p. 33, *available at* https://static1.squarespace.com/static/668c4a0dd9348c745c994ccf/t/68c89b2dafe8454dd8037224/1757977389049/2021+Facility+Master+Plan+.pdf [as of Oct. 9, 2025].
[43] Mill Valley Middle School Reconstruction Project Traffic Study", PHA Transportation Consultants, August 2024, EIR Appendix, p. 263 [PDF pagination].

11 (cont.)

existing max capacity for Edna. Traffic and emergency ingress/egress are important issues, but they are being exaggerated at community meetings beyond what the data supports. The EIR needs to clarify the traffic and enrollment figures and discuss the extent to which sensible mitigation could address this community concern.

This alternative, for MVMS to reside at Edna, is compelling and worth careful, accurate analysis in the EIR because:

- It would meet all of the District's goals, as set forth in the EIR, and would actually do a better job of achieving objectives 5 and 6 (addressing concerns related to sea level rise odors, and site conditions, and constructing climate resilient facilities) than any of the alternatives on the current site.[44]
- The site is seismically much safer, with a modern foundation and no liquefaction zone.
- There are no toxic soils, explosive methane, or other health risks, which would enhance safety for students and teachers, while also reducing the District's toxic tort liability exposure.

12

- No students would have to endure construction noise. The Middle School students would remain at the current site until Edna is ready. Edna students could join their new schools before construction begins at the Edna site.
- It would result in a sustainable building that avoids the sea level rise "island" effect and leaching contamination.
- There would be no more sewer smell for any students.
- There would be no need to spend money on a temporary campus and toxic soil removal, thus permitting a more efficient and durable use of taxpayer dollars.
- There would be no need for students to move mid-year.
- Compared to the Dual-School Option, this would significantly mitigate traffic impacts in the neighborhood and promote public safety during emergencies.

[44] EIR p. 43 [PDF pagination].

- The current Middle School and Edna have comparable acreages. Per the EIR, MVMS is on 8 acres,[45] (though the 2021 Master Plan lists it at 10.3 acres)[46] while Edna is listed at 9.1 acres in the 2021 Master Plan.[47]

- With its 9.1 acres, Edna Maguire serves 366 students (16% of the District's student population). For comparison, Park has 308 students on 3.1 acres[48] and MVMS has 698 on somewhere between 8 and 10.3 acres.

12 (cont.)

- This would keep Grades 6-8th together.

- This would hopefully allow the District to retain their current tenant, West America Tae Kwon Do, as middle school students also enjoy this after-school activity.

As a variation on that theme, the District should also explore adding a smaller elementary school to the Terra Marin location, so that children in that area still have a neighborhood elementary school, while mitigating the traffic and crowding concerns that are causing such dissatisfaction with the Dual-Schools Option. The Draft EIR improperly rejects these and similar options based on cursory, inadequate description and analysis, without proper supporting evidence.

VII. The District's Timeline Is Unrealistic

Given the deficiencies in the EIR, the District's published schedule is unrealistic. As discussed above, the District proposes to certify the Final EIR in December 2025, before DTSC concurrence on the PEA (or, potentially, the revised Health Risk Assessment), and without preparing a revised Draft EIR that identifies, adequately analyzes, and provides mitigation for the version of the project the District actually intends to consider. The schedule then assumes construction could begin in June 2026 and finish in December 2028.

13 Promising a 2026 construction start creates false expectations and undermines public trust, particularly as other aggressive targets have already been repeatedly pushed back. Asking the school board, and the public, to choose between competing alternatives without final scope and cost information could again yield wasted efforts and pointless community discord. Rather than trying to project false confidence, the District should honestly disclose to the public where information gaps remain, what they are doing to close them, who has to approve various aspects of the project, how long that will take, and what the District is doing to preserve bond funds in the meantime. Until the District completes all three phases of the PEA process, with DTSC

[45] EIR p. 135 [PDF pagination].
[46] 2021 Master Plan, *supra,* p. 84.
[47] *Id*. at p. 74.
[48] *Id*. at p. 78.

13 (cont.)

concurrence, prepares a new Draft EIR that actually identifies a proposed project and meaningfully analyzes feasible alternatives, and receives assurance from the Division of State Architect and California Geological Survey that whatever project it intends to build can actually be built, further steps toward approval are premature.

VIII. Requests

We therefore respectfully request that the District:

1. Withdraw the current Draft EIR and recirculate a revised Draft EIR that complies with CEQA's requirements, including requirements for an accurate project description and meaningful analysis of alternatives.

2. Complete the PEA process, address DTSC's comments, and secure DTSC's concurrence before proceeding with CEQA review. Ensure the revised Draft EIR incorporates definitive findings from the PEA regarding whether soil mixing, ground improvement, or foundation replacement will be required, and whether such measures are financially feasible.

3. Secure approval from the Division of State Architect and California Geological Survey before finalizing CEQA review and making a decision on the project.

14

4. Identify financially viable options first, and only then recommence CEQA review limited to financially feasible alternatives.

5. Ensure that the revised Draft EIR provides full project-level analysis of the viable alternatives, including geotechnical and structural requirements.

6. Refrain from expending material amounts of bond funds, entering into contracts for construction or temporary classrooms, or taking further action on the project until a revised Draft EIR has been completed and circulated.

7. Suspend discretionary spending on Measure G projects, including at the elementary sites, until the District determines whether portable classrooms or other basic facilities will be required at the elementary sites, instead of mere discretionary improvements.

8. Release a realistic project timeline that avoids moving children mid-year.

9. Expand the alternative analysis to include the potential for (i) converting Edna Maguire to serve as the middle school site, dispersing the current Edna students to the remaining

elementary sites, and (ii) same as the foregoing, but with the variation of constructing a smaller Edna elementary school at the Terra Marin site.

14 (cont.)

10. Within the alternatives related to Edna Maguire, use accurate enrollment figures and add more traffic mitigation options, such as a common drop off point with shuttles, as well as acknowledge planned street improvements that could further address this impact.

11. When evaluating the feasibility of the Edna alternatives, utilize updated and accurate enrollment data, not projections from 2021 that are artificially high.

IX. Conclusion

The District and its consultants vastly underestimated the environmental and geological problems at the current middle school site and mitigation costs required for the Discarded Rebuild Project. Now they are proposing a limited renovation done at the cost of a completely new high-end build. The proposed remodel lacks the details needed to estimate cost and safety: The necessity of soil mixing for those project components, the service life of the renovated building, or measures to address seismic risk, sea level rise and its impact on the soil cap over the dump all have yet to be addressed in a meaningful way.

The EIR improperly rejects the feasible alternative of relocating MVMS to the Edna Maguire site based on outdated student enrollment data. The option for a permanent campus on Edna's site with either student relocation or smaller elementary school at Terra Marin is a feasible solution, as indicated on page 268 of the Draft EIR, especially when buttressed with actual, not projected, enrollment numbers and realistic trends.

15

Yes, there would be challenges: transportation logistics, preservation of cultural sites, and accommodation of neighborhood services like West America Taekwondo. But these pale in comparison – in both risk and cost – to maintaining a campus on a toxic dump prone to liquefaction and near-term flooding. **This site is simply too risky and too expensive.**

Let's challenge the District's consultants to offer practical and sustainable solutions. Let's also ensure our tax dollars are wisely invested in a safe and resilient facility that can be used for decades to come and that will make the community rightly proud of our excellent public schools.

The community is entitled to an honest and thorough analysis of the true scope, costs, and environmental impacts of the project actually under consideration, not one already deemed infeasible. Until the District complies with CEQA and Education Code requirements, further action would be premature, legally vulnerable, and fiscally irresponsible.

MVMS Modernization Mess
an association of concerned parents
mvmsmodernizationmess.com | mvmsmodernizationmess@gmail.com

Thank you for considering these comments.

Respectfully submitted,

MVMS Modernization Mess,

an association of concerned parents

Responses to Mill Valley Modernization Mess Comments

The Mill Valley Modernization Mess Organization submitted a 179-page comment letter. The substantive comments are provided in the first 17 pages of the letter, with the remainder comprised of supporting documentation. The comments are provided above, with specific comments numbered and addressed according to their numbers below. The supporting information provided in the comment letter is reproduced as a whole in Appendix F to this Comments and Responses document.

Response to Comment 1. This comment summarizes the substantive comments in the MVMS letter. Each of the comments is addresses in full in the following responses.

Response to Comment 2. The comment is noted. It introduces the comments that follow, which are addressed in detail below.

Response to Comment 3. This comment summarizes the timeline of events with respect to foundation design and project costs. This comment is noted.

Response to Comment 4. Comment 4 claims that the Draft EIR contains an inaccurate project description, which renders the entire document misleading and inaccurate. Comment 4 specifically raises concerns with the the description of various alternatives to the Project, including Alternative 5. For a full discussion of these claims, see Master Response 5 and Master Response 6.

As discussed in greater detail in Master Response 5, the Project Description meets the requirements of CEQA. Further, the lead agency is not required to approve the proposed project described in the EIR and the lead agency has the flexibility to approve either a portion of the project analyzed or an alternative to the project analyzed in the EIR.

As discussed in greater detail in Master Response 6, the Draft EIR's analysis of Alternative 5 has been updated in this Final EIR, and with the inclusion of the updated analysis, the discussion of Alternative 5 facilitates an assessment of the relative merits of the Project and this alternative that is sufficient for purposes of CEQA.

Response to Comment 5. Comment 5 takes issue with the Draft EIR's description of Alternative 5 with respect to the current building's foundation. As clarified in the Final EIR, Alternative 5 would not renovate either the existing building or foundations. The potential for seismic hazards would remain low in part due to the protections afforded

under the legal framework applicable to the original construction. The Mill Valley Middle School campus was built in 1972 under the Field Act, one of California's strongest and most successful school safety laws. The Field Act requires all public school buildings to be designed by licensed architects and structural engineers, reviewed and approved by the Division of the State Architect (DSA), and inspected during construction to verify compliance with rigorous seismic standards. Since its adoption in 1933, no Field Act–compliant school building has collapsed or caused student injury in an earthquake.

To the extent there are any existing seismic hazards, CEQA generally does not require an analysis of the impact of existing environmental conditions on a proposed project. (*California Building Industry Association v. Bay Area Air Quality Management District* (2015) 62 Cal.4th 369, 377 [holding that agencies subject to CEQA are generally not required to analyze the impact of existing environmental conditions on a project's future users or residents].) To the extent there are existing seismic hazards at the site, such hazards are considered existing conditions of the site and are not project impacts requiring analysis or consideration under CEQA. In some cases, CEQA may require additional analysis where a project risks exacerbating environmental hazards or conditions that exist. (*East Sacramento Partnerships for a Livable City v. City of Sacramento* (2016) 5 Cal.App.5th 281, 296.) As discussed above however, the alternative would not exacerbate any existing conditions and therefore CEQA does not require any additional analysis of the impacts of sea level rise on the Project. (*Id*. at 296-97.)

With respect to the seismic safety of the Interim Campus at the MVMS site, the proposed foundation design has been reviewed by the California Geological Survey on behalf of the State Architect and determined to be appropriate to address seismic hazards including settlement and liquefaction[13].

Response to Comment 6. Comment 6 takes issue with the discussion of the existing soil cap for purposes of Alternative 5 in the Draft EIR. The Final EIR's discussion of Alternative 5 includes an expanded discussion of "Hazards, Hazardous Materials, and Wildfire."

Please see Master Response 7 for a discussion of these issues.

[13] California Department of Conservation, California Geological Survey, Letter to Elizabeth Kaufman, Superintendent, Mill Valley School District, November 12, 2025, *Second Engineering Geology and Seismology Review for Mill Valley Middle School - Proposed Interim Campus. 425 Sycamore Street, Mill Valley, CA*. CGS Application No. 01-CGS6942.

Response to Comment 7. Comment 7 claims that the Draft EIR fails to disclose and propose adequate mitigation for hazards related to the existing school site. Specifically, Comment 7 claims that the EIR is inadequate because a project could be approved before the PEA and accompanying Mitigation Plan are finalized.

The Final EIR includes an updated Hazards, Hazardous Materials and Wildfire section in the Staff-Initiated Text Changes chapter of this document.

Master Response 7 describes in greater detail (1) the ongoing process regarding the preparation of a PEA in relation to the approval of a project and the requirements under CEQA and (2) the proposed mitigation measures. Please refer to that Master Response for additional information.

Response to Comment 8. Comment 8 takes issue with various purported financial issues relating to the costs of Alternative 5. CEQA does not however require analysis of project financial issues except in determining feasibility of mitigations and alternatives, or if there may be indirect physical impacts from the financial impacts. Please see Master Response 1 and Master Response 5 for a discussion of financial issues and feasibility more generally.

Response to Comment 9. Comment 9 claims that the EIR improperly rejects reasonable alternatives based on insufficient evidence, including outdated enrollment projections. Specifically, Comment 9 argues that the EIR improperly relied on the 2024-2025 enrollment projects set forth in the 2021 Master Facilities Plan rather than the currently existing enrollment numbers.

For purposes of CEQA analysis however, the environmental setting to be analyzed as the "baseline" condition generally must be the conditions in existence at the time the Notice of Preparation is published. (CEQA Guidelines Section 15125(a)(1) ["Generally, the lead agency should describe physical environmental conditions as they exist at the time the notice of preparation is published…"].) Further, CEQA Guidelines Section 15125(a)(1) states that "a lead agency may also use baselines consisting of both existing conditions and projected future conditions that are supported by reliable projections based on substantial evidence in the record."

Consistent with these requirements the Draft EIR's analysis of the alternatives was properly based on the 2021 Facility Master Plan data, which was the best data available when the Notice of Preparation was issued on June 14, 2024. The decision to base the Draft EIR's analysis of the alternatives on this data is based on substantial evidence in

the record and is proper, and there is no requirement under CEQA that would require the District to update its analysis to reflect the enrollment data suggested by the commenter. In addition, the District received a new demographic study in February 2025, which contained projections that were generally similar to the 2021 Facility Master Plan, thereby indirectly supporting the original use of the 2021 Master Facilities Plan's enrollment projects.

Response to Comment 10. Comment 10 again takes issue with the enrollment data relied upon for purposes of the analysis of alternatives in the EIR. See Response to Comment 9 above for an explanation of why the EIR's reliance on the enrollment data set forth in the 2021 Facility Master Plan was proper.

Response to Comment 11. The comment regarding feasibility of alternatives discussed in the DEIR is noted. Please see response to Comment 10, above with respect to enrollment assumptions.

Response to Comment 12. This comment re-states the conclusions of the EIR with respect to the alternative that locates a permanent campus at the Edna Maguire School. The comment is noted. With respect to an additional alternative placing a smaller elementary school at the Terra Marin site, the EIR contains a broad range of feasible alternatives, and is not required to address all alternatives identified by the public. In any case, impacts of the suggested alternative would be similar to the dual-schools alternative addressed in the EIR.

Response to Comment 13. Comment 13 claims that the District's timeline for constructing the project is unrealistic and that "[p]romising a 2026 construction start creates false expectations and undermines public trust…" This comment does not however explain specifically how such timeline is unrealistic, and the District's proposed construction schedule is supported by substantial evidence in the EIR.

The proposed construction schedule for the Project is initially discussed in Section 2.5 of the Draft EIR, which indicates that "[t]he project is expected to take approximately 48 months to complete" and explains in detail the estimations regarding each of the four following phases: Construction of Temporary Campus; Demolition of Existing Main Building; Construction of Replacement Campus; Removal of Temporary Campus & Completion of Site Development. Each of these phases and the work required is described in detail in Section 2.5. The analysis contained in the discussion of the Alternatives is based on a comparison of each alternative and the work required under the alternative to the work proposed within the scope of the project analyzed.

The assumptions underlying the EIR's analysis of the project and the alternatives are supported by substantial evidence and this comment fails to show that the EIR's assumptions are not supported by substantial evidence.

Response to Comment 14. Comment 14 raises various requests for the District, which seem to relate to various claims previously made by the commenter on purported deficiencies in the EIR's analysis. The claims on which such requests are made have however been discussed individually in Responses to Comments 1 through 13, above.

More generally, such requests do not raise significant environmental issues, and therefore the District is not required to consider them. (See Master Response 1 for more information.)

In addition, such requests in and of themselves do not by themselves show that the EIR's analysis and conclusions are unsupported by substantial evidence.

Response to Comment 15. Please see responses to Comments 4-14, above. The EIR does not reject relocating the MVMS campus to the Edna Maguire site. Any rejection of alternatives would be up to the Board of Trustees after certification of the EIR.

188. Ila and Mateo Marchetta Comments

From: **Ila Panik** <ilamarchetta@gmail.com>
Date: Thu, Oct 9, 2025 at 10:57 PM
Subject: Move the middle school to the Terra Marin site
To: <ekaufman@mvschools.org>, <jarroyo@mvschools.org>
Cc: <cboc@mvschools.org>, <ptacouncil@mvschools.org>, Matteo Marchetta <marchetta.matteo@googlemail.com>

Hello Leaders tasked with hearing the voice of the community,

I am writing to express my strong support for moving the middle school to the Edna McGuire school site.

As a Mill Valley parent, I'm concerned about the health and safety of students and teachers given the existing Middle School site's documented contamination.

My support notes:

- Please complete the soil tests and mitigation plans before finalizing a decision.

- I support exploring the Edna Maguire site as a safer and more cost-effective alternative.

- The District should not approve a project before knowing if it meets seismic and environmental safety standards.

- As a taxpayer, I want to see my dollars used wisely on a lasting, safe facility.

- Declining enrollment numbers do not support the 2021 Master Plan analysis that eliminates the consideration of the Edna Magure site for a middle school.

- I agree with the concerns in the MVMS Modernization Mess public comment letter, and I'd like the District to meaningfully address the requests in that letter.

Additional considerations I would be highly supportive of:

1) transition the entire Edna McGuire School to become the middle school in addition to the additional build to accommodate the larger population at the additional land beside the school (where the Terra Marin school had been). And spread Edna students amongst the other 4 elementary schools. Eliminating the TK or moving that or 6th graders to the existing middle school when it is complete.

2) Keep students in the 5 elementary schools through 6th grade and make the middle school a junior high with 7th and 8th grades thereby fitting nicely into a new build at the Terra Marin site. Eliminating the TK in favor of the 6th graders in safe, established sites where the students are already comfortable.

Sincerely,

Ila & Matteo Marchetta
Mill Valley CA residents
2 students, 5th & 8th grades

Responses to Ila and Matteo Marchetta Comments

Please see Master Response 1. Please also see the updated Section 3.7 (Hazards, Hazardous Materials and Wildfire) of the Final EIR and Master Response 7 regarding the forthcoming finalization of a Preliminary Endangerment Assessment, as well as the mitigation measures in the EIR. Extensive soils testing at the Project site has been conducted and is under review by the California Geological Survey on behalf of the Division of the State Architect, which is responsible for review and approval of all school construction projects.

Please also see the Response to Mill Valley Modernization Mess Comments for a discussion of seismic hazards, existing soil conditions, hazards, and the enrollment data used for purposes of the EIR's analysis.

189. Charles Bush Comments

From: **KathyAndCharley Bush** <charthley@gmail.com>
Date: Thu, Oct 9, 2025 at 9:49 PM
Subject: Public Comment on Mill Valley Middle School Modernization Draft EIR
To: <jarroyo@mvschools.org>

As a district parent, I am writing to support the middle school's relocation to 70 Lomita. The safety reports for the current campus are all based on whether everything stays as is, but raise unacceptable risks related to seismic activity or anything else that might disturb the soil. The site's instability is a fundamental threat that cannot be ignored. Why should we invest this much money on a location that does not seem sustainable or durable to these risks?

Please include these comments in the Draft EIR under my name.

Regards,

Charles Bush

Response to Charles Bush Comments

Please see Master Response 1. The Renovation Alternative would not upgrade the building or foundations to meet current building code seismic design standards. The potential for seismic hazards would remain low in part due to the protections afforded under the legal framework applicable to the original construction. The Mill Valley Middle School campus was built in 1972 under the Field Act, one of California's strongest and most successful school safety laws. The Field Act requires all public school buildings to be designed by licensed architects and structural engineers, reviewed and approved by the Division of the State Architect (DSA), and inspected during construction to verify compliance with rigorous seismic standards. Since its adoption in 1933, no Field Act–compliant school building has collapsed or caused student injury in an earthquake.

190. Julie Baldocchi Comments

From: **Julie Baldocchi** <juliecbaldocchi@gmail.com>
Date: Thu, Oct 9, 2025 at 9:29 PM
Subject: Moving MV Middle School
To: <jarroyo@mvschools.org>

Dear Julie,

I am writing to express my strong support for rebuilding the new middle school on its existing site rather than relocating it to a smaller parcel on a narrow, single-lane road. The current location offers far better infrastructure, multiple access points, safer traffic flow, and sufficient space for students, staff, and emergency vehicles.

Relocating the school to a constrained site would introduce significant traffic congestion, safety risks, and disruption to the surrounding Lomita neighborhood. It's difficult to see how such a move could serve the best interests of our students or our community as a whole.

While I understand that a few voices have advocated for the move, I believe their concerns overlook the broader, long-term impact on neighborhood livability and public safety. The practical and responsible path forward is to rebuild where the school already stands, a site that has served the community well for decades.

Thank you for considering the perspective of those of us who live here and deeply value thoughtful, community-based planning.

Sincerely,

Julie Chase Baldocchi

Responses to Julie Baldocchi Comments

Please see Master Response 1. Please also see Master Response 3 for a discussion of potential impacts relating to transportation,

191. Annie Schlabs Comments

From: **Annie Schlabs** <annie_schlabs@yahoo.com>
Date: Sat, Sep 13, 2025 at 4:20 PM
Subject: MV Middle School Modernization Project
To: jarroyo@mvschools.org <jarroyo@mvschools.org>

Hello,

I want to send my strongest objection to having West America TKD studio and After Care programs displaced to have it used as project management site.

Please keep the program where they are! They are too important for the community!

Thank you!

Annie Schlabs

407 Magee Avenue

Mill Valley, CA 94941

Responses to Annie Schlabs Comments

Please see Mater Response 2.

192. Christina Cars Zbar Comments

From: **Christina Card** <chris.card@gmail.com>
Date: Fri, Sep 12, 2025 at 7:06 PM
Subject: Please keep West America TKD in its home
To: <jarroyo@mvschools.org>

Dear Mill Valley School District Board,

I strongly urge you not to displace West America TKD & After Care from its Lomita Dr. location. For 42 years, this dojo has been more than a building—it's been a safe, supportive community where children and families learn discipline, confidence, and respect.

Losing this space would disrupt a legacy that has shaped generations. Please find a solution that allows the middle school renovation to move forward without forcing West America from the home it has built with this community.

My two kids love TKD because of the community Sensei Chantal and Sensei Roger have carried on and nurtured. We would be devastated to see them displaced.

Thank you for your consideration.
Sincerely,

Chris Card Zbar

Responses to Christina Card Zbar Comments

Please see Mater Response 2.

193. Scott Valley Homeowners Association

(Comment letter begins on the following page)

SCOTT VALLEY HOMEOWNERS' ASSOCIATION

PO Box 392 ◆ MILL VALLEY, CA 94942

EMAIL: info@scottvalleyhoa.org ◆ PHONE: 415 388-5809

SCOTT VALLEY
BOARD OF DIRECTORS

John Palmer
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Francine Millman
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Steven Bodovitz
Director
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Director
Robert Mithun
Director

October 12, 2025

Superintendent Elizabeth Kaufman (ekaufman@millvalleyschools.org)
Operations Director Julio Arroyo (jarroyo@mvschools.org)

Mill Valley School District
411 Sycamore Avenue
Mill Valley, CA 94941

Re: Mill Valley Middle School Modernization

Dear Superintendent Kaufman, Director Arroyo, et al:

I am writing on behalf of the Board of Directors of the Scott Valley Homeowners Association (SVHOA) to offer our analysis of the Draft Environmental Impact Report (DEIR) and the conclusions we came to after studying it and other pertinent materials. Our Association has a long history of working to upgrade and preserve the quality of life in the neighborhood of Mill Valley which flanks and overlooks Edna Maguire School, the school many of our constituents' and other neighbors' children attend. Accordingly, we are watching the development of the Mill Valley School District's (the District) modernization plans for the Mill Valley Middle School (MVMS) very closely.

For those not intimately familiar with all the documents, in the DEIR and this paper, the word "Project" refers to the plan, no longer under consideration, to demolish and rebuild the school at the existing site. What we are considering here are the District's preferred Alternatives to the Project, Alternatives #s 4 and 5; however, we have included information and quotes for those instances where wording for those Alternatives ties back to the Project. We'll try to clarify these distinctions as we go along.

In general, the SVHOA's Board finds the DEIR to be convincing in its analysis of the impacts of the District's Alternatives regarding modernization of the Middle School. After a deep dive into the document and the arguments pro and con as set forth in various meetings, websites, written submittals to the District, and fact sheets in circulation, our Board is prepared to state the following unanimously approved conclusions for the record:

1. As to construction/reconstruction, we are pleased to join the large group of Edna parents and Superintendent Elizabeth Kaufman in support of Alternative 5, reconstructing the Middle School in situ, that is, renovating the existing building in its current physical location on Sycamore. It's the most fiscally responsible and least impactful of the considered Alternatives. ①
2. As to housing students during the construction process, we are again pleased to join the Edna parents and Dr. Kaufman in support of using portables to house all 6th-8th-grade students at the existing MVMS site for the duration of construction.
3. As a corollary to the above, we strongly oppose a) construction of a new school at the Lomita site, b) using the 70 Lomita/Terra Marin site for temporary housing classrooms during the construction process, and c) converting Edna Maguire into the new MVMS and

1 (cont.) dispersing its students as recommended by the some members of the public (see the final paragraph herein).

2 4. We request that the Marin Terra campus remain intact, and that West America Tae Kwon Do (WATKD), which many of our neighborhood children, including my own, have attended, remain open in its current location.

Reconstruction. The arguments for renovating in place are strong:

1. Renovating the school at its current Sycamore location is by far the most transportation-friendly of all the listed Alternatives, as it is central to many of its students, with multiple access routes for bicycles and pedestrians, as many middle school students walk or bike to school. As such, it is also the most environmentally friendly of the Alternatives. The DEIR confirms this statement in Section 5-25, in its discussion of Alternative 4, the other Alternative currently under consideration, constructing a new middle school at 70 Lomita, the Terra Marin site adjacent to Edna Maguire, as follows:

3 > As detailed in a traffic analysis prepared for this alternative (#4, which we oppose): With the added traffic from the middle school, traffic service levels at the school entrance and exit would drop to LOS (level of service) E and F from LOS A with Edna Maguire Elementary School. Long vehicle queues can be expected on Lomita Drive creating problems for residential access in the area and blocking driveways. The added traffic would add noticeable traffic to Lomita Drive, which is a residential street. While this would not necessarily result in hazardous conditions, it would impede neighborhood access during peak drop-off and pick-up times.
> **NOTE:** LOS E is considered unacceptable, F is basically bumper-to-bumper.

And again, on page 5-33, as follows:

> Because of the overall reduction in environmental impacts, the Rehabilitation Alternative (#5, which we support) would be considered the Environmentally Superior Alternative.

4 2. The existing site, at 18.5 acres (inclusive of the entire District property), provides adequate space for physical education, whereas the Lomita site, at 4 acres, is clearly too small; in fact, the Lomita site would be rated as inadequate by State of California educational standards, which call for 15-25 acres for a school of MVMS's size. Additionally, the existing Sycamore site is large enough to provide for growth of the student body by another 335 students.

5 3. The Lomita site is more remote, which would increase automobile trips through the most congested and lowest rated intersection in town – Camino Alto and Blithedale. The DEIR addresses this fact in the following excerpt from page 3.10-11, in discussing the (abandoned) Project, but which would have the same effect of keeping the middle school in its current Sycamore location:

> The proposed Project would continue to service the Mill Valley public middle school student population as does the existing campus and would not result in students

attending from other localities that could increase VMT. (Vehicle Miles Traveled.) Further, the Project would be at the same site as the existing school, eliminating any changes in VMT that could occur if the school were to be relocated.

In other words, there would be no impact to traffic at Sycamore, Blithedale, or Lomita, if the MVMS were to continue at the existing site, whether renovated or newly constructed, as there would be if Alternatives 3 or 4, both of which involve relocating the MVMS to the Lomita site, were selected.

5 (cont.)

4. The Lomita site's access infrastructure is already overburdened, and the streets accessing Edna Maguire are generally in poor condition. As noted, the existing MVMS site at Sycamore provides room for growth for up to an additional 335 students, while the Lomita site is already burdened at 436 students; our neighborhood suffers the consequences of this deficiency - a large group of Edna parents uses the streets in our neighborhood directly above Edna as a pick-up and drop-off sites, creating circulation issues for our constituents at those times.

6

5. Reconstructing in place eliminates the need to displace West America Tae Kwon Do (WATKD), which provides after-school activities for many Edna Maguire students.

Interim Housing.

7

We support the idea of housing MVMS students at the Sycamore site during the construction process for many reasons, among them: a) there are more recreational opportunities for them there, b) there are more services nearby, c) many MVMS students walk or bike to school and could continue to do so much more easily than at Lomita, d) it would reduce traffic impacts on Blithedale and Lomita as documented above, and e) it would allow WATKD to remain in place.

Student safety during reconstruction:

1. After reading the studies and analyses in the DEIR, we agree with the DEIR's assessment that the existing site can be renovated, using recommended mitigation measures (Alternative 5, which we support) , without creating environmental or safety issues for students temporarily housed nearby, and described in Sections 3.2-9 – 3.2-20, and Sections 5.28 and 5.29, as follows:

8

P3.2-10: As noted throughout this air quality analysis, the Project (no longer under consideration) would not exceed BAAQMD's significance threshold and all air quality impacts would be less than significant. Therefore, the Project supports the primary goals of the *2017 Clean Air Plan.*

P5.28: ***Air Quality***. Overall, the construction impacts on air quality (from Alternative 5) would be lower than the proposed Project (no longer under consideration). The operational impacts on air quality would be similar as with the proposed Project. The odor impacts would be similar or less than the proposed Project given that filtration

would be improved in the new building compared with the existing building, and the existing building is slightly more distant from the wastewater treatment plant. Odor impacts to the interim campus occupants would be similar to with the proposed Project.

P5.29: **Geology, *Soils, and Seismicity***

8 (cont.)

This alternative (#5) would renovate the existing building and possibly the foundations to meet current building code seismic requirements**. NOTE:** The renovation alternative we are backing would bring the entire MVMS up to current seismic code, thus alleviating one of the safety concerns voiced against the project.

Transportation. This alternative (#5) would use the same access facilities as with the proposed Project and would be at the same location. Therefore, levels of service, safety, parking, access, and VMT impacts would be the same as with the proposed Project.

Other points we considered.

A. Sea-level rise. The DEIR has this to say about sea-level rise (SLR) at the site, an excerpt from page 3.8-11:

...sea-level- rise impacts at the school site are part of a greater regional change in San Francisco Bay water levels, and not a school-specific issue. All low-lying areas surrounding San Francisco Bay would be affected if not protected. Richardson Bay, lower areas of Mill Valley, much of Larkspur and Corte Madera, and much of San Rafael would be flooded. The developed areas near Pickleweed Inlet are particularly vulnerable because of their low elevations and high level of development. Regional adaptation and protection strategies would need to be employed to counter this hazard.

9

I spoke with Mill Valley's City Manager Todd Cusimano and ex-mayor Urban Carmel, and was assured that City leadership will do, over time, what is necessary to protect the many City assets in the immediate vicinity of the Middle School, which include the Community Center, Friends' Fields, the SASM treatment plant, Hauke Park, the multi-use path (a County asset), the skateboard park, and City streets and utilities, from sea level rise. For example, the City of Amsterdam and approximately a third of the land mass of the Netherlands lie below sea level; as we learned in elementary school, the clever and industrious Dutch have devised a system of sea walls (dikes), stormwater management, and other pumping systems to prevent flooding. The existing Middle School site would naturally become part of any such project, should one become necessary.

B. Odors from the SASM plant: Here's an excerpt of what the DEIR has to say on this subject:

10

P 3.2- 37: Assuming new odor control systems for the headworks, belt filter press room, gravity thickener, and primary clarifiers, **the analysis indicated (sewage) plant odor emissions would rarely be detectable beyond the plant fence line (emphasis added).**

Notably, odors also result from the marsh conditions within the Pickleweed Inlet, which discharges to the west side of Richardson Bay, an arm of the San Francisco Bay, especially

> during warmer temperatures and winds from the southeast. These natural marsh gas odors are sometimes difficult to distinguish from odors from the SASM WWTP (wastewater treatment plant).

10 (cont.)

As an aside, I managed teams in the Mill Valley Little League for 15 years, both spring and fall, and at the time, the League's batting cages, which we used twice a week after school, were situated immediately adjacent to the SASM plant. There was never a time when any odor from the plant caused anyone on my teams any discomfort. In fact, I honestly can't recall even smelling the plant, though there were plenty of times we smelled the nearby marsh at low tide. That is obviously limited empirical data, but it lines up perfectly with the tests performed by experts and the resulting conclusions drawn in this section of the DEIR.

C. Contaminated soil. On page 3.7-18, we find this statement:

> The Project proposes to cap all areas of the site with paving, building foundations, and/or clean fill. Capping eliminates the potential direct exposure and ingestion pathways to future site receptors. Potential for soil vapor intrusion into the proposed new school buildings would be reduced to less-than-significant levels by incorporation of a Vapor Intrusion Mitigation System (VIMS), which may consist of required soil vapor barriers, sub-slab ventilation, and other components, which have been incorporated into the Project design. Operation, monitoring, and maintenance as directed by DTSC and the LEA would occur as part of the Project to assure that future students and staff are not exposed to COPC-impacted soil vapor indoors at levels that present health risks. **Mitigation 3.7-2 ...** would assure that this impact would be reduced to a **less-than-significant** level.

11

The fields adjacent to the MVMS site, which were also part of the earlier landfill, were capped decades ago, and have been in continuous use by MV Little League and Soccer Leagues ever since, and I managed teams on them for 15 years, and to my knowledge there were no reported environmental problems, vapors, methane gas emissions, etc. That is also empirical information, but it is in line with the tests performed by experts and resulting conclusions drawn in this section of the DEIR. Applying even more up to date mitigation methods, such as those mandated in the referenced section on page 3.7-2 in the DEIR, should eliminate this concern.

D. Regarding the modernization alternative we do not recommend: the DEIR has this (excerpt) to say on page 5-14 about building a new middle school adjacent to Edna Maguire, and/or housing the middle school students temporarily at the Terra Marin site.

> Under this Alternative option (#4), the Edna Maguire/Terra Marin site would accommodate 1,201 students (436 with Edna Maguire Elementary School and 765 with the interim middle school). (**NOTE** – not including staff)

12

That total of 1201 students plus staff would be almost triple the number at Edna currently, and thus triple the amount of traffic, etc., if the District locates MVMS students during construction at Edna or builds a new school next door. The infrastructure at Lomita/Edna barely

accommodates the current load of 436 students and staff, and parents already clog up the neighborhood streets above Edna, often thoughtlessly. The County infrastructure around Edna is out-of-date, with the streets poorly paved and inadequate traffic flow. Locating any additional students and staff at the Terra site would make a bad situation much worse.

E. The Edna Maguire campus was just rebuilt, a multi-year project that was finally completed in 2014; the project was contentious, generated litigation from other neighborhood groups (not ours), and the construction itself was disruptive to our neighborhood. We strongly oppose any more construction, permanent or temporary, on the Edna/Lomita site or the immediate vicinity.

12 (cont.)

Finally, regarding Alternative #3, relocating the middle school to the Edna site and dispersing Edna students to the other elementary schools, which is not even under consideration in the current process, but which is being pushed vociferously by certain groups: Here's an excerpt from what the DEIR has to say about this option:

> With this alternative, the traffic service levels at Lomita Drive and the school entrance and exit driveways would worsen because of the additional middle school students compared with the elementary students, and there would be more parent parking spillover onto Lomita Drive neighborhood. As described above, this alternative would need to conform to the terms of the January 17, 2012 settlement agreement regarding parking and circulation, as discussed above for the Permanent Edna Maguire alternative.

13

What backers of this alternative don't seem to appreciate is that Edna Maguire is a neighborhood school with easy bicycle and pedestrian access for local children, and the existing MVMS site is central to all the elementary schools in Mill Valley, with its own easy bicycle, pedestrian, and optimal automobile access. Alternative #3 would dramatically worsen the already miserable LOS for the Camino Alto/Blithedale intersection, cause further back-ups at Lomita/Blithedale/Roque Moraes, displace our neighborhood children, and force those who can easily walk or bike to both schools, Edna and MVMS, into cars, all of which would vastly increase VMTs at the worst-rated intersection in all of Mill Valley. That's why Alternative 5 is the DEIR's preferred environmental and most practical choice, as well as the preferred choice for Edna parents, the District's Superintendent, and our HOA.

Thank you for considering our neighborhood's wishes and concerns regarding the MVMS modernization project.

Scott Valley Homeowners' Association Board of Directors
John Palmer, President
Francine Millman, Vice President
Diana Guo-Buxton, Treasurer
Ann Dye, Secretary
Ken Campbell, Director
Steven Bodovitz, Director
Bob Mithun, Director

Responses to Scott Valley Homeowners Association Letter

Response to Comment 1. The SVHOA's position on the proposed Project and alternatives is noted. Please see Master Response 1.

Response to Comment 2. Please see Master Response 2.

Response to Comment 3. The comment regarding acceptability of increased traffic is noted. Please see Master Response 3 for a general discussion of traffic and transportation impacts.

Response to Comment 4. Please see Master Response 4.

Response to Comment 5. The comment regarding the remoteness of the site is noted. Please see Master Response 3 for a general discussion of traffic and transportation impacts.

Response to Comment 6. Please see Master Response 2.

Response to Comment 7. Please see Master Response 1.

Response to Comment 8. The comment's inclusion of EIR discussions on health and safety is noted.

Response to Comment 9. With respect to sea-level concerns specifically, please see Responses to City of Mill Valley Comments related to sea-level rise (Agency Letter No. 3, comments 7-17).

Response to Comment 10. The comments on odors are noted.

Response to Comment 11. The comments on contaminated soils are noted.

Response to Comment 12. The SVHOA's comments regarding the Edna Maguire/Terra Marin site alternatives are noted. Please see Master Responses 1 and 3.

194. Scott Ellison Comments

From: **Scott Ellison** <scottmellison@gmail.com>
Date: Sun, Oct 12, 2025 at 10:08 PM
Subject: Mill Valley Middle School Modernization Project
To: <jarroyo@mvschools.org>, <letterstotheboardoftrustees@mvschools.org>

Dear Julio and Board Members,

I hope this message finds you well. My name is Scott Ellison, and I'm the parent of a 3rd grader and a Kindergartner at Edna Maguire. I understand that the Board will soon be making an important decision regarding the MVMS modernization project, and I wanted to share my perspective both as a parent whose children will be directly impacted and as a member of the broader Mill Valley community.

I strongly believe that the most practical, responsible, and safest plan is to renovate the existing MVMS campus and temporarily house all 6th–8th grade students in portable classrooms at the Sycamore Avenue site during construction.

The Environmental Impact Report clearly supports that renovating the current campus and using temporary on-site classrooms is a safe and manageable approach, with appropriate measures in place to protect students throughout the process.

I'm very concerned about the alternative proposals, particularly those involving the construction of a new middle school at or next to the Edna Maguire campus, or temporarily relocating middle school students there during the years-long project. Either of these options would cause major disruption for the students, teachers, and staff at Edna Maguire. Our school community just completed a full renovation in 2014, and it would be deeply unfair and unnecessarily disruptive to subject the school to another major upheaval so soon.

As a resident of the Alto-Sutton neighborhood, I'm also really worried about the traffic and safety impacts that would result from bringing hundreds of additional students to the area. The surrounding streets already experience significant congestion, and this plan would only worsen the daily bottlenecks. Renovating the current MVMS site keeps the school centrally located and accessible for students who walk or bike.

For all of these reasons, I urge the Board to move forward with renovating MVMS at its current site and temporarily housing all students in portables at the Sycamore location

during the renovation. This is the most logical, equitable, and community-minded path forward for our students and for Mill Valley as a whole.

Thank you for your time and consideration.

Sincerely,
Scott Ellison

Responses to Scott Ellison Comments

Please see Master Responses 1 and 3.

195. John Whitaker Comments

From: **jtlwhitaker** <jtlwhitaker@comcast.net>
Date: Sun, Oct 12, 2025 at 8:47 PM
Subject: MVMS comment
To: <jarroyo@mvschools.org>

I am firmly opposed to the development of Terra Marin.

The neighborhood surrounding edna maguire cannot handle the additional traffic that would be associated with this development. This neighborhood is already heavily impacted by the current configuration of Edna Maguire. The streets are not improved, have no sidewalks, no lighting, and are full of pot holes. This neighborhood is already straining under the traffic associated with the current population of Edna Maguire. Most kids are driven to school and thus the existing demands on Lomita are extreme.

Plans should be focused on improving the existing middle school. It is accessible from multiple routes throughout mill valley.

John Whitaker

122 Lomia Drive

Responses to John Whitaker Comments

Please see Master Responses 1 and 3.

196. abensco@aol.com comments

From: <abensco@aol.com>
Date: Sun, Oct 12, 2025 at 6:06 PM
Subject: Middle School Public Comment
To: <jarroyo@mvschools.org>

Oct. 12, 2025

To Whom it May Concern,

We SUPPORT A REMODEL AT THE CURRENT LOCATION!
That site is/has been used for years and it provides enough space for Middle School needs. Such as a central location for ALL Mill Valley students to get to.
A large enough site to accommodate a large number of students and staff.

It is a convenient location for students to get to the Community Rec Center where there are many activities for Mill Valley students.

There would not be a large negative impact on a residential neighborhood.

We are AGAINST a Middle School at 70 Lomita Dr.
as that site is at the end of a small street in a RESIDENTIAL neighborhood.

There are already 3 campus' at the end of Lomita, which includes the largest elementary school with a large enrollment which negatively impacts traffic in the neighborhood as it is.

Cars and walking students would create noise, which, we're sure would annoy and upset the residents of that relatively quiet neighborhood.

Not to mention E-BIKES racing up and down the residential streets. A safety hazard for ALL!

And finally, the GARBAGE, I'm sure that would be dropped while walking to and from school. I worked at a school...I KNOW!

Five schools feed into the Middle School and a smaller site in a quiet residential neighborhood just DOES NOT MAKE ANY SENSE!

Responses to abensco@aol.com Comments

Please see Master Responses 1 and 3. The comments regarding garbage and e-bikes are noted.

197. Preston Richardson Comments

From: Gmail <prestonamerica@gmail.com>
Date: Sun, Oct 12, 2025 at 10:13 AM
Subject: MVMS remodel
To: <jarroyo@mvschools.org>

Hello,

I support MVMS remodel at its current location at 425 Sycamore.

Thank you,

Preston Richardson

Responses to Preston Richardson Comment

Please see Master Response 1.

198. Dan Boley Comments

From: **Dan** <danb0509@gmail.com>
Date: Sun, Oct 12, 2025 at 10:03 AM
Subject: Middle School Modernization Project Concerns
To: <ekaufman@mvschools.org>, <jarroyo@mvschools.org>
Cc: <cboc@mvschools.org>, <ptacouncil@mvschools.org>
Dear MVSD Board Members,

After reading through the letter from the Department of Toxic Substances Controls based on the soils samples done at the middle school location, I'm very concerned about the boards proposal to rebuild or renovate a school on this site. The letter cites on page 8, levels of Methane that were detected that are "in the explosive range". In addition levels of lead, mercury, petroleum hydrocarbon diesel, arsenic, chromium and dioxins that are well above residential SL levels.

Please, please complete all soil testing and environmental impacts BEFORE finalizing a decision, you owe that to the taxpayers. Also the board should not approve the project before knowing the project meets all environmental and seismic standards?

Regards,
Dan Boley

Responses to Dan Boley Comments

The Renovation Alternative would not upgrade the building or foundations to meet current building code seismic design standards. The potential for seismic hazards would remain low in part due to the protections afforded under the legal framework applicable to the original construction. The Mill Valley Middle School campus was built in 1972 under the Field Act, one of California's strongest and most successful school safety laws. The Field Act requires all public school buildings to be designed by licensed architects and structural engineers, reviewed and approved by the Division of the State Architect (DSA), and inspected during construction to verify compliance with rigorous seismic standards. Since its adoption in 1933, no Field Act–compliant school building has collapsed or caused student injury in an earthquake.

Please see the Responses to Comments from the California Department of Toxic Substances Control included herein, as well as Master Responses 6 and 7.

Regardless of which alternative is selected, the Project site hazards would be remediated to California Department of Toxic Substances Control Board requirements. If the Renovation Alternative is selected, it would include a sub-building vapor pressure system to assure that no hazardous levels of vapors are present inside the building.

199. Brooke Goodman Comments

From: **Brooke Goodman** <brooke.goodman@gmail.com>
Date: Sat, Oct 11, 2025 at 9:01 PM
Subject: MVMS modernization logical and environmental sound
To: <jarroyo@mvschools.org>
Cc: <ekaufman@mvschools.org>

To Whom It May Concern,

We strongly urge the Mill Valley School Board of Trustees to select the current Mill Valley Middle School (MVMS) location at **425 Sycamore Avenue** as the site for the future middle school. This location is clearly the **logical, fiscally responsible, and environmentally sound** choice for our community.

In contrast, the alternative proposal to relocate the middle school adjacent to Edna Maguire Elementary School, on the Terra Marin site, presents **numerous serious concerns** that we believe would negatively impact students, staff, parents, and surrounding neighborhoods.

Traffic & Parking Concerns

Traffic and parking around Edna Maguire are already extremely problematic. The current enrollment at MVMS is approximately **756 students**, and Edna Maguire has **428 students**—a combined total of nearly **1,200 students**, not including staff. The additional traffic from faculty, parents, and caregivers would **overwhelm** the area.

• The Edna campus lacks sufficient parking now, and proposed plans appear to **reduce parking further**, pushing overflow into **Scott Valley, Lomita Drive, and Horse Hill**, all of which have **limited access roads**.

• **Camino Alto is not considered a reliable evacuation route** during emergencies. Our family personally lost homeowners insurance three times this year due to this known fire access issue.

• In the event of a **fire or natural disaster**, the limited road access poses a major **safety risk**. If parents are trying to reach the campus while students are being evacuated, it could result in **catastrophic gridlock**.

• With many parents returning to in-person work, **staggered drop-off times** are not a viable solution for most families.

Safety Risks

The safety of our children must come first, and the proposed site at Edna Maguire raises **significant concerns**:

• **Traffic and pedestrian safety** is already a daily issue. Parents regularly park on **Azalea and Underhill**, often disregarding traffic flow and creating unsafe conditions.

• Our neighborhood's requests to the city for **crosswalks or traffic calming measures** have been denied. If the district pursues this new plan, will it fund and implement new traffic safety infrastructure?

• **Lighting and security** are also concerns. The Edna site currently lacks campus lighting for evening events. The area is accessible to the public and has seen **homeless encampments** nearby.

• A **bike path** connecting Corte Madera and Mill Valley is under consideration, which would create **direct, public access to the school campus**, raising questions about **campus security and access control**.

• A TK–8 shared site creates logistical and **developmental risks**, especially in emergency situations like an **active shooter event**. How will the district physically and operationally separate very young children from middle schoolers?

• There is **no reliable cell reception** in the Edna area. All major carriers are affected, and the issue is unresolved. In an emergency without power, **communication would be nearly impossible**.

Environmental and Archaeological Impact

• The current MVMS site has passed **all environmental safety studies**, and nearby agencies such as SASM have already implemented **odor control and technology upgrades**.

• The Edna site is an **archaeologically sensitive area**. During its last renovation, **Coast Miwok artifacts** were discovered, confirming the location of a historical Tamal village. A 2025 study reaffirmed the site's significance. Further construction would risk additional discoveries, which could **delay or even halt the project** entirely.

• It sends a mixed message to teach children about Miwok heritage in 3rd grade while simultaneously disturbing a known, sacred site.

Space & Infrastructure

• The current MVMS campus spans **approximately 14 acres**, while the Terra Marin/Edna site is roughly **4 acres**—far too small for a full middle school, especially one serving over 700 students.

• The Edna facilities were built for **younger children** and are not designed to support middle school needs. The gym and other infrastructure are **not suitable** for older students.

• Renovating Edna again, so soon after the 2014 upgrades, is unnecessary and disruptive to existing Edna students and staff.

Financial Responsibility

• Renovating the current MVMS site is the **most cost-effective** option. Much of the existing infrastructure can be salvaged or repurposed.

• Building at the Edna site would likely require:

o Major **grading and flood control**

o **Archaeological excavation** and mitigation

o **Infrastructure improvements** (e.g., cell towers, traffic signals, lighting, parking)

o All of which represent **unplanned and escalating costs**

• The current site was included in the **original bond measure**, and many residents, including elderly taxpayers who waived exemption rights, voted in good faith **expecting construction to occur at the current location**.

Conclusion

The district has a **duty to the community, to our children, and to taxpayers** to make a wise, responsible decision. Rebuilding on the current MVMS campus provides:

• A **safe**, accessible, and appropriate environment

• Room for **future expansion or adaptation**

• Significant **cost savings** and alignment with original funding intent

• Protection of **cultural heritage** and minimal disruption to other schools

Please make your decision based on the facts, not on the preferences of a few who may no longer have children in the district by the time this school is built. The long-term success and safety of Mill Valley's students depend on your choice.

Sincerely,

Brooke A Goodman
(Taxpayer and Parent)
15 Middle Ct
Mill Valley, CA 94941

Responses to Brooke Goodman Comments

Please see Master Responses 1 and 3 regarding preferences of alternatives and traffic hazards, respectively. Please see Master Response 4 regarding alternative site acreage issues. Financial issues are outside of the purview of CEQA. Cultural Resources issues are addressed in Chapter 5, with additional information added in this Comments and Responses document (see Staff Initiated Text Changes section).

200. Liz Richmond Comment

From: **Liz Richmond** <lhoogheem@gmail.com>
Date: Sat, Oct 11, 2025 at 10:50 AM
Subject: Draft EIR Public Comment — Mill Valley Middle School Project
To: <jarroyo@mvschools.org>
Cc: <LetterstotheBoardofTrustees@mvschools.org>, Elizabeth Kaufman <ekaufman@mvschools.org>

Dear MVSD and EIR Review Team,

I'm writing as a parent of a 3rd grader and a 6th grader in the district, and as a community member who has followed this project closely from the start. I've formed my perspective based on the Draft EIR, school board meetings, and discussions with board members and the superintendent. I strongly support modernizing the existing middle school and using interim housing on the current MVMS site as the most prudent, sustainable, and cost-effective path forward.

The EIR provides a thorough, science-based analysis that directly contradicts many of the alarming claims circulating online. Environmental and safety risks — including soils, hydrology, and seismic concerns — were evaluated and found to be "less than significant" or "less than significant with mitigation." The only significant unavoidable impacts identified are temporary construction noise and odor, not the catastrophic scenarios some have suggested.

Regarding foundation concerns, nothing in the EIR indicates that deep soil mixing would be required for the existing structure. Remodels typically do not require new foundations, and Section 3.2.2 reinforces that with mitigation, impacts remain within acceptable limits. Because the remodel alternative involves less overall site disturbance than a full rebuild, it seems reasonable to expect these issues would be reduced, not amplified. Both the EIR and Preliminary Environmental Assessment identify contamination and groundwater concerns but also provide clear mitigation strategies to ensure safety under regulatory oversight. If I have interpreted all of this correctly, please ensure that this is made clear in the final EIR.

I also want to highlight several practical considerations with the option to co-locate the middle school at the Edna Maguire/Lomita campus:

Parking: Expanding use of 70 Lomita would grow the Edna/Lomita campus population from about 500 to 1,350 students and staff while eliminating 43 parking spaces and the drop-off loop, with no replacement proposed. This is not feasible for traffic or parking.

Site Constraints: 70 Lomita is only about 4 acres — far too small for a modern middle school. The existing campus spans roughly 14 acres and is the more appropriate site for long-term educational use.

Cultural Sensitivity: Prior work at Edna Maguire revealed Coast Miwok cultural remains, and a 2025 study confirmed the site's archaeological significance. New construction near this area risks further discoveries, delays, and potential legal complications.

I share the community's desire for a safe, resilient, and future-ready middle school. Based on the evidence presented in the EIR, remodeling the existing campus — with careful mitigation and oversight — is the soundest path forward. It minimizes environmental and cultural impacts, uses resources wisely, and gets our students into improved classrooms sooner.

Thank you for the opportunity to comment.

Sincerely,

Liz Richmond

Responses to Liz Richmond Comments

The comment's reasons for preferring the Renovation Alternative are noted. Please see Master Responses 1 and 4.

201. Rachel Reid Holbrook Comments

From: **Rachel Reid Holbrook** <rrholbrook@mac.com>
Date: Fri, Oct 10, 2025 at 2:54 PM
Subject: Draft EIR Comments
To: <ekaufman@mvschools.org>, <jarroyo@mvschools.org>
Cc: <cboc@mvschools.org>, <ptacouncil@mvschools.org>
Hello,

I am a concerned parent with three children who have attended or still attend Mill Valley schools. I have read through the EIR and would like the board to publicly comment on the fact that – by its own admission – it's proposed MVSC renovation would not:

1 – "upgrade MVMS to current educational, safety, security, and accessibility standards"

2 – "address concerns related to projected future sea-level rise, odors, and site conditions."

3 – "allow the District to construct climate resilient and sustainable facilities and implement "green building" practices.

These are the district's own stated goals. How, then, can the district justify recommending this costly renovation? Especially when existing seismic concerns, liquification risks, rising sea levels and costly soil removal have all not been adequately addressed in the EIR?

On top of the health risks posed to children and staff, I am deeply concerned that if the long-term environmental risks posed by the MVMS modernization project are not thoroughly assessed and reported AND if the financial management of the budget are not transparently communicated by the district, that the community will lose faith and not vote for other school upgrade measures – something I saw happening when Measure B was on the ballot. That would be a devastating outcome that is simmering beneath this debate.

I believe that there are options that do allow the district to achieve its own stated goals as described above and I lend my full support to withdrawing the draft EIR in its current form so that the district can follow through on its own commitment to our community.

Thank you,
Rachel Holbrook

Responses to Rachel Reid Holbrook Comments

Please see Master Response 1.

With respect to Alternative 5, the renovations would include a vapor intrusion mitigation system (VIMS) to prevent soil vapor hazards inside the building.

The Renovation Alternative would not upgrade the building or foundations to meet current building code seismic design standards. The potential for seismic hazards would remain low in part due to the protections afforded under the legal framework applicable to the original construction. The Mill Valley Middle School campus was built in 1972 under the Field Act, one of California's strongest and most successful school safety laws. The Field Act requires all public school buildings to be designed by licensed architects and structural engineers, reviewed and approved by the Division of the State Architect (DSA), and inspected during construction to verify compliance with rigorous seismic standards. Since its adoption in 1933, no Field Act–compliant school building has collapsed or caused student injury in an earthquake.

With respect to the seismic safety of the Interim Campus at the MVMS site, the proposed foundation design has been reviewed by the California Geological Survey on behalf of the State Architect and determined to be appropriate to address seismic hazards including settlement and liquefaction[14].

[14] California Department of Conservation, California Geological Survey, Letter to Elizabeth Kaufman, Superintendent, Mill Valley School District, November 12, 2025, *Second Engineering Geology and Seismology Review for Mill Valley Middle School - Proposed Interim Campus. 425 Sycamore Street, Mill Valley, CA*. CGS Application No. 01-CGS6942.

202. Char and Ian Leary Comments

From: **Ian Leary** <ianleary@diamondcertified.org>
Date: Fri, Oct 10, 2025 at 2:31 PM
Subject: Support for Renovating and Improving Existing Mill Valley Middle School Campus
To: <jarroyo@mvschools.org>

We write to voice our opposition to the construction of a new middle school at the 70 Lomita Ave site and simultaneous support for renovating the existing middle school on Camino Alto. Maintaining and expanding upon the existing MVMS site makes more sense than building a new school at another site. Rather than build an entirely new school for the middle school population while displacing elementary school students in the process, Mill Valley should maintain and renovate the existing middle school campus in order to meet current and future needs.

We are also opposed to the displacement of West America Tae Kwon Do to make way for a new school that may not be the best investment of public funds. Our son has been attending tae kwon do at this location for eight years. This location enables him to go to and from training independently. If the best option for the town's school-age population was to build a new school at the 70 Lomita Ave site, we might consider the displacement of West America an unhappy but unavoidable side effect. That not being the case, the prospect of displacing West America further increases our opposition to the construction of a new school at the 70 Lomita Site. Improving the existing middle school campus makes more sense, and we support this option.

--

Char & Ian Leary
510 E Blithedale Ave
Mill Valley, CA 94941

Responses to Char and Ian Leary Comments

Please see Master Responses 1 and 2.

203. Rebecca Stone Comments

From: **Rebecca Law Stone** <ralaw33@gmail.com>
Date: Fri, Oct 10, 2025 at 2:11 PM
Subject: Support of current proposal for Middle School
To: <jarroyo@mvschools.org>

Hello

I am a parent of a current and a future MVMS student. I am writing in support of the plan to build the middle school on the current site, reducing further waste of funds and ensuring a timely conclusion to the project.

Please move forward as quickly as it is possible to do.

Thank you

Rebecca Stone

Response to Rebecca Stone Comments

Please see Master Response 1.

204. Wesley Caddell Comments

From: **Wesley Caddell** <wcaddell@gmail.com>
Date: Fri, Oct 10, 2025 at 1:36 PM
Subject: Draft EIR Comment
To: <ekaufman@mvschools.org>, <jarroyo@mvschools.org>
Cc: <boc@mvschools.org>, <ptacouncil@mvschools.org>

Dear Members of the Board,

As a Mill Valley parent and taxpayer, I am deeply concerned about the inadequacies of the Draft Environmental Impact Report (EIR) currently under review for the Mill Valley Middle School Modernization Project. The Draft EIR fails to provide an accurate and comprehensive project description or meaningful analysis of the renovation option now under consideration. The report devotes only three-and-a-half pages to this option—one of which is simply a picture—making it impossible for the public to evaluate or comment meaningfully on the proposed plans.

This EIR must be revised and resubmitted because:

- The project description is incomplete and misleading, omitting critical details about the scope and design of the renovation alternative.
- It relies on incomplete site hazard data, leaving unresolved questions about soil contamination, seismic safety, and other health and safety risks.
- It cites outdated enrollment figures to reject otherwise feasible alternatives, including the potential use of the Edna Maguire site, thereby undermining fair consideration of safer and more cost-effective options.

As a parent of a 10-year-old fifth grader who will attend MVMS next year, I am especially concerned about the health and safety of students and teachers given the site's documented contamination. Before moving forward, the District should complete comprehensive soil testing and mitigation plans and ensure that the project meets all seismic and environmental safety standards.

Moreover, I urge the Board to revisit the 2021 Master Plan assumptions. Declining enrollment trends across the District no longer support the outdated analysis that dismissed Edna Maguire as a viable middle school site. Using accurate, current data is essential to ensure responsible long-term planning and wise use of taxpayer funds.

I also wish to express my full support for the concerns outlined in the MVMS Modernization Mess public comment letter and ask that the District respond meaningfully to the requests raised there.

Thank you for your attention to this important matter. Please ensure the final EIR meets the community's expectations for transparency, safety, and fiscal responsibility before any project approval moves forward.

Sincerely,
Wesley Caddell
Mill Valley Resident & Parent of a Future MVMS Student

Responses to Wesley Caddell Comments

The comments concerns regarding the adequacy of the EIR, and resultant requests for augmentation and recirculation are noted.

Please see Master Response 5 for a general discussion regarding the adequacy of the Project Description. Please see Master Response 6 for a discussion regarding the adequacy of the description of Alternative 5 specifically. Please also see Master Response 7 for a discussion regarding the finalization of a Preliminary Endangerment Assessment.

Please also see responses to MVMS Modernization Mess (Comment 187) comments, which addresses the comments regarding enrollment data, hazards, and seismic safety.

205. Amy McCrea Comments

From: **Amy McCrea** <amymccrea98@gmail.com>
Date: Fri, Oct 10, 2025 at 1:16 PM
Subject: Draft EIR Comments
To: Julio Arroyo <jarroyo@mvschools.org>

Hello,

My name is Amy McCrea and I am a parent to a Mill Valley Middle School 6th grader and a 4th grader at Edna Maguire. I am submitting my comments to the Draft Environmental Impact Report for the Mill Valley Middle School Reconstruction Project.

I would like to state my support for the modernization of the current Middle School building and for keeping the temporary classrooms at the current Middle School site for these reasons:

1. There is simply not enough space for a Middle School at 70 Lomita Drive and the Edna Parking Lot.

2. If you take away the Edna Parking lot and add 700 more students and 100 more staff to the campus, the parking and traffic burden on the neighborhood would be untenable and unsafe. In the case of an emergency evacuation if both schools were on the Lomita campus the roads in the neighborhood would be completely grid locked. The existing roads around the Lomita campus are not designed to handle the amount of traffic that would be created should MVMS be added to the Lomita campus on a regular school day let alone in the case of an emergency.

3. The EIR states that housing the temporary classrooms at the current site during construction will be safe for our students and staff.

4. Removing West America Tae Kwon Do from 70 Lomita Drive would have a negative impact on the Mill Valley community as they provide necessary after care for working families across the school district.

5. If demolition of the building at 70 Lomita Drive is required, there will surely be additional costs incurred for abatement of hazardous materials such as asbestos.

6. The site at 80 and 70 Lomita Drive are at risk for significant delays due to the likelihood of finding archeological Coast Miwok artifacts.

Thank you,

Amy McCrea

Responses to Amy McCrae Comments

The comment's reasons for preferring the Renovation Alternative are noted. Please see Master Responses 1, 2 and 3.

206. Aaron Reuter Comments

From: <aaronreuter@yahoo.com>
Date: Sun, Oct 12, 2025 at 7:43 PM
Subject: Middle School
To: <jarroyo@mvschools.org>

Please do not build the new Middle School on Lomita Drive. I'm a resident at 127 Lomita Drive. This would create chaos on our narrow street for morning drops off and afternoon pickups.

Thank you for your consideration.

Aaron Reuter

127 Lomita Drive

Response to Aaron Reuter Comments

Please see Master Response 1.

207. Pierce Bruxton Comments

From: **Pierce Buxton** <piercebuxton@gmail.com>
Date: Mon, Oct 13, 2025 at 9:54 AM
Subject: Fwd: Action Requested – Re: MVMS Modernization Project
To: <jarroyo@mvschools.org>, Elizabeth Kaufman <ekaufman@mvschools.org>

Hi Julio and Elizabeth,

I've done my own separate research as well as spoken to many members across the broader Mill Valley community. The Scott Valley HOA statement below does a very good job of summarizing my own position on the MVMS modernization issue. I hope we resolve this quickly so we can move to implementation!

Thank you,

Pierce Buxton

1 Upperhill Rd, Mill Valley, CA 94941

---------- Forwarded message ---------
From: **info scottvalleyhoa.org** <info@scottvalleyhoa.org>
Date: Sun, Oct 12, 2025 at 7:56 PM
Subject: Action Requested – Re: MVMS Modernization Project
To:

Dear Scott Valley Neighbors:

Attached please find the letter from the Scott Valley Homeowners Association describing the HOA's position on the release of the Mill Valley School District's plan (the draft EIR) to modernize the middle school. In short, we support the positions taken by Superintendent Kaufman and a large group of Edna Maguire parents. Here are the main points of our letter:

In general, the SVHOA's Board finds the DEIR to be convincing in its analysis of the impacts of the District's Alternatives regarding modernization of the Middle School. After a deep dive into the document and the arguments pro and con as set forth in various meetings, websites, written submittals to the District, and fact sheets in circulation, our Board is prepared to state the following unanimously approved conclusions for the record:

1. As to construction/reconstruction, we are pleased to join the large group of Edna parents and Superintendent Elizabeth Kaufman in support of Alternative 5, reconstructing the Middle School in situ, that is, renovating the existing building in its current physical location on Sycamore. It's the most fiscally responsible and least impactful of the considered Alternatives.

2. As to housing students during the construction process, we are again pleased to join the Edna parents and Dr. Kaufman in support of using portables to house all 6th-8th grade students at the existing MVMS site for the duration of construction.

3. As a corollary to the above, we strongly oppose a) construction of a new school at the Lomita site, b) using the 70 Lomita/Terra Marin site for temporary housing classrooms during the construction process, and c) converting Edna Maguire into the new MVMS and dispersing its students as recommended by the some members of the public (see the final paragraph herein).

4. We request that the Marin Terra campus remain intact, and that West America Tae Kwon Do (WATKD), which many of our neighborhood children, including my own, have attended, remain open in its current location.

The full draft EIR can be found at : https://www.mvschools.org/facilities-modernization

If you agree with our positions, we strongly urge you to simply say so by email **before the comment deadline of 5:00 pm this coming Friday, October 17**, directing your email first to Operations Director Julio Arroyo (jarroyo@mvschools.org), with a copy to Superintendent Elizabeth Kaufman (ekaufman@mvschools.org).

Thank you,

Scott Valley HOA Board of Directors

Responses to Pierce Bruxton Comments

Please see Master Response 1. Please also see responses to Scott Valley HOA comments, Comment 192, above.

208. Geoffrey Knopp and Fernanda Repsold Comments

From: **Knopp Geoffrey** <g_knopper@yahoo.com>
Date: Mon, Oct 13, 2025 at 12:43 PM
Subject: Draft EIR Comment
To: ekaufman@mvschools.org <ekaufman@mvschools.org>, jarroyo@mvschools.org <jarroyo@mvschools.org>
Cc: cboc@mvschool.org <cboc@mvschool.org>, ptacouncil@mvschools.org <ptacouncil@mvschools.org>, Fernanda Repsold <f_repsold@yahoo.com>

To whom It may concern,

As taxpayers and residents of Mill Valley, and parents of two children currently in the public school system (Old Mill and MVMS), we are concerned on many levels about the district's inclusion of renovating the middle school as an option for consideration. Given the many established challenges and risks associated with the current location of the middle school, choosing this option would represent yet another misguided step of wasteful taxpayer spending, and keep our children in potential harm's way, especially when there are safer and better alternatives, such as moving the middle school to a new location at Lomita.

Safety, first and foremost. In the original plans for a new construction of the middle school at its current location, soil mixing was required to prevent liquefaction in case of earthquakes due to the fact that the site rests on landfill. Subsequently, as we recently learned, not even mobile units can be used unless soil mixing is done. By logical extension, any existing structure, i.e., the middle school, that rests on the same site is dangerous and falls short of today's safety standards. The Loma Prieta Earthquake caused complete destruction of thirty-five buildings in the Marina District (50 miles away), which also sits on landfill. Further, and equally concerning, recent soil samples have shown that the hazardous gases and contaminants present far exceed legal levels due to the site's past history as a dump. This begs the question – why we would want to subject our children to these potential hazards by keeping them at this location?

Wasteful taxpayer spending. Spending ninety-five million dollars on refurbishing existing buildings that are highly susceptible to these potential hazards, plus flooding, is not a good use of taxpayer money and places much of the investment at risk. Measure G initially called for the construction of a new middle school, which included soil mixing, as well as elevated site locations to account for rising sea levels, But now, neither

remediation measure will happen. Would taxpayers today still vote yes for Measure G if they knew it was for this option? Maybe we should go back to the ballot to decide.

Traffic concerns. When I pick my 6th grade son up from Mill Valley Middle School, typically I see 30-40 cars. It seems, at least on non-rainy days, that the vast majority of middle school students either walk, scoot, or bike to school. I actually see more cars at Old Mill when I pick up my 2nd grade daughter. Have we really looked into what the increase in traffic will be if MVMS were to move to a new location at Lomita? And as others have suggested, shouldn't we be able to come up with creative ways, such as a shuttle bus service etc., to mitigate any of these concerns? As a community, are we willing to prioritize traffic concerns over the wellbeing of our children?

Property Values.

"Whether or not you have school-age children, the quality of local schools impacts the quality of life in a community and impacts local home values. Academic research has shown that good local schools create demand for homes and help keep property values strong." -Mill Valley School District. Let's be honest, placing a school on top of a former dump and burn site, and right across from a waste water treatment plant, was never a good idea to begin with. It's hard to envision how anyone can find that appealing or additive to the community's "quality of life." Far better we think to relocate the middle school to the safe and beautiful area at Lomita. This will be far better for the safety and happiness of our community's children and for the overall quality of life for Mill Valley for many years to come.

Sincerely,
Geoff Knopp & Fernanda Repsold

Responses to Geoffrey Knopp and Fernanda Repsold Comments

Please see Master Responses 1 and 3.

The comment's concerns with safety at the existing school site are noted. As an initial matter, the Final EIR also includes an updated discussion on "Hazards, Hazardous Materials and Wildfire" at Section 3.7. This updated analysis expands further on the Draft EIR's analysis of the same topics. As discussed in that analysis, the Project would be subject to Mitigation Measure 3.7-1 and 3.7-2, which require in part that the District prepare and implement a Mitigation Plan and PCLUCP for the Project Site in consultation with DTSC and the LEA that ensures that potential risks are managed in accordance with environmental agency regulations, standards and guidance such that, with mitigation measures (if any), risks are below the benchmark thresholds. Mitigation

Measure 3.7-2 specifically requires the plans to include, at a minimum, "placement of an effective cap over the disturbed portion of the landfill, installation of a VIMS, and land use restrictions." Such plans must also include requirements for "post-closure maintenance and monitoring including monitoring and inspection specifications and frequencies, cap-integrity measures, and drainage and erosion control measures."

The Renovation Alternative would not upgrade the building or foundations to meet current building code seismic design standards. The potential for seismic hazards would remain low in part due to the protections afforded under the legal framework applicable to the original construction. The Mill Valley Middle School campus was built in 1972 under the Field Act, one of California's strongest and most successful school safety laws. The Field Act requires all public school buildings to be designed by licensed architects and structural engineers, reviewed and approved by the Division of the State Architect (DSA), and inspected during construction to verify compliance with rigorous seismic standards. Since its adoption in 1933, no Field Act–compliant school building has collapsed or caused student injury in an earthquake.

With respect to the seismic safety of the Interim Campus at the MVMS site, the proposed foundation design has been reviewed by the California Geological Survey on behalf of the State Architect and determined to be appropriate to address seismic hazards including settlement and liquefaction[15].

Taxpayer spending and property value concerns also are noted. Financial management decisions and property value impacts are not CEQA physical environmental issues.

Traffic impacts for the potential Lomita Drive alternatives have been evaluated with full Project buildout (except for the Interim Campus alternative, which uses existing student loads). They also do not address staggered school hours of the provision of school buses. Therefore traffic analyses for these alternatives represent worst-case conditions. Taxpayer spending and property value concerns also are noted. Financial management decisions and property value impacts are not CEQA physical environmental issues.

Traffic impacts for the potential Lomita Drive alternatives have been evaluated with full Project buildout (except for the Interim Campus alternative, which uses existing student

[15] California Department of Conservation, California Geological Survey, Letter to Elizabeth Kaufman, Superintendent, Mill Valley School District, November 12, 2025, *Second Engineering Geology and Seismology Review for Mill Valley Middle School - Proposed Interim Campus. 425 Sycamore Street, Mill Valley, CA*. CGS Application No. 01-CGS6942.

loads). They also do not address staggered school hours of the provision of school buses. Therefore traffic analyses for these alternatives represent worst-case conditions.

209. Sharon Callaghan Comment

From: <callaghansharon75@gmail.com>
Date: Mon, Oct 13, 2025 at 1:06 PM
Subject: I Support Remodel At Current Location Of 425 Sycamore !
To: <jarroyo@mvschools.org>

Response to Sharon Callaghan Comment

Please see Master Response 1.

210. Lauren Snell Comments

From: **Lauren Snell** <lauren@intertext.com>
Date: Mon, Oct 13, 2025 at 2:35 PM
Subject: support for MVMS at Edna Maguire site – option 3
To: <jarroyo@mvschools.org>

Hello,

I have lived as a homeowner in the Alto Sutton neighborhood for more than 25 years. My children attended Edna Maguire, MVMS and Tam High. After reading the EIR, I would like to register my support for Option 3, a permanent middle school campus at the Edna Maguire site.

This is the most fiscally responsible option, and the least disruptive to the neighborhood in terms of traffic and access. With the construction of just one building and installation of a few portables, you can solve the MVMS location problem.

Option 2 appears to be very expensive and places a large burden on the Alto Sutton neighborhood, if only temporarily. It's also a waste of resources, given declining numbers of students to use the newly built Terra Marin site after MVMS is redone.

Option 4 would place an undue burden on the Alto Sutton neighborhood and cost too much money.

Option 5 seems to push the problem down the road. MVMS needs to be completely renovated, and no piecemeal solution will solve the problems.

When I moved to Mill Valley, Strawberry Point school was inactive. Things change, and I am sure you'll hear from families in the neighborhood that will be disappointed, as the first Strawberry Point families must have been when it shut down. But Alto Sutton will remain a vibrant and family-friendly neighborhood with the middle school instead of an elementary school in place.

Thank you.

Lauren Snell

Response to Lauren Snell Comments

Please see Master Response 1.

211. Peter Imlay Comments

Peter Imlay
11 Mountain View Ave.
Mill Valley, CA 94941

October 13, 2025

Elizabeth Kaufman, Superintendent
Julio Arroyo, Director of Maintenance and Operations
Mill Valley School District
411 Sycamore Avenue
Mill Valley, CA 94941
ekaufman@mvschools.org jarroyo@mvschools.org
CC: cboc@mvschools.org ptacouncil@mvschools.org

RE: Draft Environmental Impact Report for Mill Valley Middle School Modernization Project

Dear Members of the Mill Valley School District Board of Trustees:

I am writing to comment on the Draft EIR for the Mill Valley Middle School Modernization Project. I strongly support relocating the middle school to the Edna Maguire site rather than renovating the existing Sycamore Avenue campus.

The Sycamore Avenue Site is Fundamentally Flawed

The current site sits atop a former burn dump with documented contamination including lead levels 81 times above California safety limits, methane gas, hexavalent chromium, and other carcinogens. While capped now, any construction would disturb this barrier. The Draft EIR acknowledges that “exposure to maximum concentrations of contaminants could, if not mitigated, pose a cancer risk and/or health hazard.”

Beyond contamination, the site faces sea-level rise (1.4 feet by 2070), sits adjacent to the sewage treatment plant with persistent odor issues, and is built on landfill prone to liquefaction. The EIR itself states the renovation alternative fails to meet three key project objectives: upgrading to current safety standards, addressing sea-level rise and site conditions, and constructing climate-resilient facilities.

Renovation costs escalated from $130 million to $156 million due to soil issues. A $95 million renovation that leaves the 1970s foundation on contaminated, flood-prone land while requiring decades of monitoring is not fiscal responsibility—it's deferred expense and risk.

The Traffic Argument Against Edna Maguire Doesn't Hold Up

The district claims traffic at Edna Maguire is insurmountable, but this contradicts the EIR's own analysis. The Draft EIR evaluates a dual-school scenario with both elementary and middle schools (nearly 1,400 students total) at the Lomita Drive site and concludes it would work with traffic mitigation. If 1,400 students is manageable, then 756 middle school students alone is clearly feasible.

Moreover, Edna Maguire was designed and built in 2014 to accommodate 680 students—nearly identical to MVMS's current 756 enrollment. The infrastructure was engineered for this traffic volume. Middle schoolers also walk and bike more independently than elementary students, creating less concentrated drop-off traffic.

Traffic mitigation is routine—staggered bell times, crossing guards, safe routes to school programs. These are solvable logistics, not fundamental barriers. Yet we're being asked to accept toxic contamination, flooding risk, and sewage odors because of manageable traffic concerns. This prioritization is backwards.

Enrollment Projections Are Outdated and Distort the Analysis

The EIR dismisses the stand-alone Edna Maguire option using enrollment projections from the 2021 Master Plan that haven't materialized. The district now acknowledges middle school capacity needs have dropped from 1,200 to 950 students. Using inflated projections to reject a clean site while acknowledging we need less capacity reveals analytical inconsistency. The stand-alone Edna Maguire option deserves evaluation based on current enrollment realities, not outdated assumptions.

The Choice is Clear

The Draft EIR explicitly states that Edna Maguire alternatives "would meet all project objectives" while renovation "would meet most, but not all." When combined with the facts that:

- Edna Maguire is a clean site free from contamination

- Students can stay at Sycamore during construction (no interim housing costs or exposure to construction near toxic waste)
- The site can handle the traffic (per EIR's own dual-school analysis)
- It's not vulnerable to flooding and sea-level rise
- It provides predictable costs without contamination surprises

The superior choice becomes obvious.

I urge the Board to select the Edna Maguire site, update enrollment projections to current data, and study a stand-alone middle school option there. Our children deserve a learning environment free from environmental contamination, flooding risks, and sewage odors. Traffic can be managed. Toxic waste cannot be wished away.

Sincere regards,

Peter Imlay
11 Mountain View Ave.
Mill Valley, CA 94941

Responses to Peter Imlay Comments

Please see Master Response 1 regarding preferences of alternatives. Please see Master Response 3 for a general discussion regarding the analysis of potential transportation impacts.

Please see Responses to Mill Valley Middle School Mess comments included herein for a discussion of several raised topics including the enrollment data relied upon for purposes of the EIR. With respect to sea-level concerns specifically, please see Responses to City of Mill Valley Comments related to sea-level rise (Agency Letter No. 3, comments 7-17).

212. Mark Lutzker Comments

From: **Mark Lutzker** <lutzker3@yahoo.com>
Date: Mon, Oct 13, 2025 at 11:14 PM
Subject: Public Comment on Mill Valley Middle School Modernization Draft EIR
To: jarroyo@mvschools.org <jarroyo@mvschools.org>

Hi Julio,

I am a Mill Valley School District parent commenting on the Mill Valley Middle School Modernization Draft EIR. I support renovating the existing middle school building rather than building new facilities at 70 Lomita.

Key Concerns with 70 Lomita:

Traffic & Parking: Building at 70 Lomita would flood Lomita Drive with excessive traffic, burdening surrounding neighborhoods. The site lacks sufficient parking for the population increase from 500 to 1,350 students/staff, especially with plans to remove 43 existing parking spaces.

Site Inadequacy: At only 4 acres, 70 Lomita cannot adequately house a middle school compared to the current 14-acre site. Elementary and middle schoolers would be forced to share play spaces and gyms, which is developmentally inappropriate.

Community Disruption: Edna Maguire was just renovated in 2014 and shouldn't face another major disruption. The beloved taekwondo studio and aftercare program would be displaced, removing an important community resource families rely on.

Educational Impact: Middle schoolers should remain together in one location to build community before high school, not be split between sites.

Benefits of Renovation:

- The EIR confirms renovation with on-site portables is safe
- New HVAC systems can address any odor concerns
- Maintains central location supporting walking/biking to school
- Leverages the most appropriate site size per state guidelines

Please include these comments in the Draft EIR under my name.

Thank you,
Mark Lutzker
214 Beryl Street, 94941

Responses to Mark Lutzker Comments

Please see Master Responses 1-4.

213. Karen Jernstedt Comments

From: **Karen Jernstedt** <kjernstedt@comcast.net>
Date: Mon, Oct 13, 2025 at 9:52 PM
Subject: Middle School location
To: <jarroyo@mvschools.org>

Mill Valley School District,

I urge the decision makers to choose Alternative 1: Renovation of the MVMS campus. This option seems to maximize District assets and best meet the needs of our Middle School students. The “Pros” of this alternative and the “Cons” of shoehorning a new Middle School campus into 70 Lomita clearly point to this choice.

I am sure you have received many eloquent communications going over each point in depth so I shall not offer my own redundancies. The current site has been studied and shown to be safe for students and staff, and I have confidence that $95 million will be well spent in doing a superb renovation.

I hope the Board is able to reach an amicable consensus on this issue and has the opportunity to move ahead on the project and get on to other important matters! Thank you for your diligence.

Sincerely,

Karen Jernstedt

MVMS parent, Class of 2001, 2003, 2006

MVMS grandparent, Class of 2035, 2037

Response to Karen Jernstedt Comments

Please see Master Response 1.

214. Heather and Wade Schlueter Comments

From: **Heather SCHLUETER** <waderific@aol.com>
Date: Mon, Oct 13, 2025 at 8:43 PM
Subject: MVMS
To: <jarroyo@mvschools.org>

We agree that the Middle School should be reconstructed at its current sight. Alternative 5.

Thank you
Heather and Wade Schlueter

Response to Heather and Wade Schleuter Comments

Please see Master Response 1.

215. Dorian Grillet Comments

From: **Dorian Grillet** <dgrillet6857@mycom.marin.edu>
Date: Mon, Oct 13, 2025 at 7:46 PM
Subject: Commenting on the proposed Middle School at 70 Lomita Drive
To: jarroyo@mvschools.org <jarroyo@mvschools.org>

Dear Mill Valley District School Board,

I would like to raise concerns with the proposed location at 70 Lomita Drive. West America Tae Kwon Do and After Care, currently located at 70 Lomita Drive, has been providing our community with an amazing safe space to learn, grow, and be active—especially for the children of this community—for over 40 years. If West America Tae Kwon Do and After Care is forced to move, it would be extremely disruptive for many in the community; especially our children.

Thank you for your consideration.

Sincerely,

Dorian Grillet

Response to Dorian Grillet Comments

Please see Master Response 2.

216. Brittany Ye Comments

From: **Brittanyye** <Brittanyye@proton.me>
Date: Mon, Oct 13, 2025 at 7:08 PM
Subject: Public Comment Letter on the Draft EIR – Mill Valley Middle School Modernization Project
To: Jarroyo@mvschools.org <Jarroyo@mvschools.org>

Dear Trustees and Project Team,

As a concerned member of the Mill Valley community, I am submitting this formal comment on the Draft Environmental Impact Report (DEIR) for the Mill Valley Middle School Modernization Project. My intent is to urge the District to pause advancement of the project schedule until critical legal, technical, and procedural deficiencies in the Draft EIR are fully resolved. Proceeding to certification before these corrections would expose the District to substantial CEQA litigation risk and undermine public confidence in the Measure G program.

29) **Premature Review Before DTSC Concurrence**

The Draft EIR is being circulated prior to the Department of Toxic Substances Control (DTSC) completing its review of the Preliminary Endangerment Assessment (PEA). CEQA Guidelines (§15004(b)(2)(A)) require that environmental review not be conducted "in isolation from meaningful project information." Without DTSC concurrence, the EIR lacks a verified baseline of environmental safety and soil contamination levels, which are essential for determining construction feasibility and necessary remediation measures.

2. Unstable and Inaccurate Project Description

The DEIR's project description is neither accurate nor stable, violating CEQA's requirement for clarity and internal consistency (§15124).

- The document alternates between describing a full rebuild and a phased modernization, creating confusion about actual scope, costs, and soil disturbance levels.
- The "preferred" option appears to have shifted toward a major renovation, yet this alternative is discussed in only 3.5 pages of the DEIR.
- The description omits critical design specifics (e.g., extent of demolition, pile vs. DSM foundation strategy) that directly affect environmental impacts.

Without a fixed project description, impact analyses cannot be relied upon, rendering the EIR legally vulnerable (see County of Inyo v. City of Los Angeles, 71 Cal.App.3d 185 (1977)).

6. **Deficient Alternatives Analysis**

The EIR fails to meet CEQA's requirement for "a reasonable range of alternatives" (§15126.6). The analysis dismisses potentially feasible alternatives—including relocation of the campus to the Edna Maguire site—based on outdated 2021 enrollment data and generalized statements of infeasibility.

CEQA case law (Laurel Heights Improvement Assn. v. Regents of the Univ. of Cal., 47 Cal.3d 376 (1988)) holds that an agency must objectively evaluate feasible alternatives that could reduce significant impacts. The cursory dismissal of Edna Maguire, despite the site's existing infrastructure and lower contamination risk, represents a substantive flaw that requires recirculation.

7. **Inadequate Public Review Period**

The public review process has been constrained by limited notice, overlapping comment deadlines, and release of technical appendices through inconsistent online postings.

Under CEQA §15087I, agencies must ensure "meaningful opportunity for public review." In this case, the short window and incomplete technical access (notably missing DTSC PEA data and geotechnical findings) compromise the integrity of the public process.

8. **Fiscal and Environmental Prudence**

Although not strictly a CEQA issue, the project's escalating budget—from $130 million to $156 million—coupled with uncertainty over remediation costs, underscores the need for a measured, transparent approach. Modernizing the existing facilities with safer soil conditions could achieve educational goals at a fraction of the cost and risk.

30) **Requested Actions**

Given the issues described above, I respectfully request that the District:

1. Suspend certification of the Draft EIR until DTSC concurrence is received and fully integrated.

2. Clarify and stabilize the project description to reflect current design direction.

3. Recirculate the EIR under CEQA §15088.5 with updated alternatives, soil data, and fiscal analysis.

4. Provide a 60-day public review period to ensure transparency and community participation.

Taking these steps will safeguard both the District and community from future litigation, enhance public trust, and ensure the chosen project reflects environmental responsibility and sound governance.

Sincerely,

Concerned Mill Valley Community Member

Responses to Brittny Ye Comments

Response to Comment 1. Comment 1 suggests that the EIR is deficient because it has been prepared and circulated prior to the completion of a PEA by the DTSC. See Master Response 7 for a response regarding this topic.

Response to Comment 2. Comment 2 claims that the Draft EIR's project description is neither accurate nor stable.

In support of this claim, Comment 2 first argues that the Draft EIR "alternates between describing a full rebuild and a phased modernization, creating confusion about actual scope, costs, and soil disturbance levels." This comment appears to conflate the Project analyzed in the Draft EIR with one of the alternatives (Alternative 5 – Renovation of the Existing MVMS Main Building and Gym) in the EIR. Both this Project and this alternative are however analyzed in distinct sections of the EIR. Further, an expanded analysis of Alternative 5, which clarifies the scope of this alternative and expands on the Draft EIR's environmental analysis of this alternative, is included in this Final EIR.

Comment 2 also claims that "[t]he 'preferred' option appears to have shifted toward a major renovation, yet this alternative is discussed in only 3.5 pages of the [Draft EIR]." To the extent the commenter is referring to Alternative 5, as discussed previously, an expanded analysis of Alternative 5, which clarifies the scope of this alternative and expands on the Draft EIR's environmental analysis of this alternative, is included in this Final EIR.

Comment 2 further argues that the project description omits critical design specifics that directly affect environmental impacts. See Master Response 5 for a detailed discussion

of the adequacy of the Project Description and the requirements for a Project Description under CEQA.

Response to Comment 3. Comment 3 claims that the analysis of alternatives is deficient and that the analysis dismisses potentially feasibly alternatives based on 2021 enrollment data and generalized statements of infeasibility.

With respect to Comment 3's general claims regarding the adequacy of alternatives and the infeasibility of alternatives, see Master Response 5. (*See also* Master Response 6 for a discussion regarding Alternative 5 specifically.)

With respect to this comment's claims regarding the use of the 2021 data, this comment has been responded in a prior response (*see* Response to Comment 9 from Mill Valley Modernization Mess), which is reproduced below:

> "Comment 9 claims that the EIR improperly rejects reasonable alternatives based on insufficient evidence, including outdated enrollment projections. Specifically, Comment 9 argues that the EIR improperly relied on the 2024-2025 enrollment projects set forth in the 2021 Master Facilities Plan rather than the currently existing enrollment numbers.
>
> For purposes of CEQA analysis however, the environmental setting to be analyzed as the "baseline" condition generally must be the conditions in existence at the time the Notice of Preparation is published. (CEQA Guidelines Section 15125(a)(1) ["Generally, the lead agency should describe physical environmental conditions as they exist at the time the notice of preparation is published…"].) Further, CEQA Guidelines Section 15125(a)(1) states that "a lead agency may also use baselines consisting of both existing conditions and projected future conditions that are supported by reliable projections based on substantial evidence in the record."
>
> Consistent with these requirements the Draft EIR's analysis of the alternatives was properly based on the 2021 Facility Master Plan data, which was the best data available when the Notice of Preparation was issued on June 14, 2024. The decision to base the Draft EIR's analysis of the alternatives on this data is based on substantial evidence in the record and is proper, and there is no requirement under CEQA that would require the District to update its analysis to reflect the enrollment data suggested by the commenter. In addition, the District received a new demographic study in February 2025, which contained projections that were

generally similar to the 2021 Facility Master Plan, thereby indirectly supporting the original use of the 2021 Master Facilities Plan's enrollment projects."

Response to Comment 4. Comment 4 claims that the public review process "has been constrained by limited notice, overlapping comment deadlines, and release of technical appendices through inconsistent online postings."

In addition to not failing to provide clarity as to specific issues here, this comment fails to provide any substantial evidence to support any of the purported deficiencies here and has failed to show how any purported technical noncompliance has thwarted the requirements of CEQA.

In addition, this comment fails to show that any purported deficiency would result in a "prejudicial error" by which the EIR would be deemed inadequate. To the extent any error occurred, CEQA mandates "that there is no presumption that error is prejudicial." (Public Resources Code Section 21005.) Consistent with this requirement, the focus must be on whether the violation of CEQA prevented informed decision making or public participation. It must be shown that the agency abused its discretion by omitting information required by law and that the error was prejudicial because "it deprived the public and decision-makers of substantial relevant information about the project's likely adverse impacts." (*Neighbors for Smart Rail v. Exposition Metro Line Construction Authority* (2013) 57 Cal.4th 439, 463.)

Here, the comment has failed to show that any purported substantive or procedural violation interfered with CEQA's public participation and information disclosure objectives. (*See, e.g., Environmental Protection Information Center v. California Department of Forestry & Fire Protection* (2008) 44 Cal.4th 459 [finding procedural violation nonprejudicial under Public Resources Code Section 21005].)

See also response to Comment 1 and Master Response 7 for a discussion of this comment's specific claims regarding the PEA. The project site's geotechnical hazards are described in the Geology and Soils chapter of the DEIR.

Response to Comment 5. As stated in the comment, fiscal issues are not addressed under CEQA, which focuses on physical environmental issues, except where they may have indirect impacts to the physical environment.

Response to Comment 6. Please see Responses to Comment 187, Comment # 14.

217. Corrine Grillet Comments

From: **Corinne Grillet** <corinne.grillet@gmail.com>
Date: Mon, Oct 13, 2025 at 5:51 PM
Subject: Comments on the proposed Middle School at 70 Lomita Drive
To: <jarroyo@mvschools.org>

Dear Mill Valley School District Board,

I want to raise an issue with the proposed relocation and the displacement of the very valued community service West America Tae Kwon Do and After Care, which provides great service and environment for our kids after school.
For 42 years, this dojo has been more than a building—it's been a safe, supportive community where children and families learn discipline, confidence, and respect. Started by Roger Carlon, now run by his children Roger Jr and Chantal, this is a true long-term family business extremely supportive of the Mill Valley community and Marin in general.

The displacement will be extremely disruptive for our kids and I urge you to find a solution that allows the middle school renovation to move forward without forcing out West America Tae Kwon Do and After Care.

Thank you for your consideration.
Sincerely,

Response to Corrine Grillet Comments

Please see Master Response 2.

218. Benson Kaukennonen Comments

From: **drkanga@aol.com** <drkanga@aol.com>
Date: Tue, Oct 14, 2025 at 7:49 AM
Subject: Middle School Modernization
To: jarroyo@mvschools.org <jarroyo@mvschools.org>
Cc: ekaufman@mvschools.org <ekaufman@mvschools.org>

Dear Mr. Arroyo:

I am a long time resident of Scott Valley and my sons–who were the third generation in my home–attended Edna Maguire and Mill Valley Middle School. I am in complete accord with the position the Scott Valley Home Owner's Association, and that of Superintendent Kaufman, takes regarding the proposed modernization of the Middle School.

I thank you for your attention to this matter.

Benson Kaukonen

Scott Valley

Responses to Benson Kaukenen Comments

Please see Master Response 1.

219. Marc Lester Comments

From: **marc lester** <marcwlesterod@gmail.com>
Date: Tue, Oct 14, 2025 at 8:38 AM
Subject: Middle school
To: <jarroyo@mvschools.org>
I have lived in MV since 1987-both of my kids attended MVMS-
I strongly believe that MVMS should remain at its current location!
Sincerely,
Dr. Marc Lester

Response to Marc Lester Comments

Please see Master Response 1.

220. Karolina Gachowska Comments

From: **451isturbe gachowska** <karolciagpl@icloud.com>
Date: Tue, Oct 14, 2025 at 8:29 AM
Subject: MVMS
To: <jarroyo@mvschools.org>

Hello, my name is Karolina Gachowska. I have 2 children at Edna and I would like to let you know that I'm in favor of modernization of MVMS with portable classrooms on site. I still would support this option even if my kids would be in different school. I hope parents votes will for something. Thank you

Response to Karolina Gachowska Comment

Please see Master Response 1.

221. George Caliendo Comments

From: **George Caliendo** <g_caliendo@yahoo.com>
Date: Tue, Oct 14, 2025 at 9:42 AM
Subject: Draft EIR Comment
To: <ekaufman@mvschools.org>, <jarroyo@mvschools.org>
Cc: <cboc@mvschools.org>, <ptacouncil@mvschools.org>

I believe renovating the current Mill Valley Middle School is deeply concerning because its location, sitting on landfill and a former dump site, poses significant safety risks, including vulnerability to earthquakes and hazardous contaminants. I feel that spending $95 million to refurbish buildings at such a site, without proper remediation for these dangers or for flooding, is not a responsible use of public money. Relocating the middle school to Lomita instead appears to be an excellent option. Our children and the community will get a modern, safe school. I understand some community members worry about increased traffic if the school moves to Lomita, but I feel these concerns can be addressed with solutions such as an efficient bussing program. Keeping a school on top of a hazardous former dump and across from a waste water treatment plant does not benefit our children nor our community's quality of life. I feel strongly that relocating the middle school to Lomita would provide a safer and more appealing environment for everyone in Mill Valley.

George Caliendo

16 Lovell Avenue

Mill Valley, CA 94941

Responses to George Caliendo Comments

Please see Master Response 1.

222. Laren Weitzman Comments

From: **Lauren Weitzman** <laur414@gmail.com>
Date: Tue, Oct 14, 2025 at 9:41 AM
Subject: Comment on EIR
To: <jarroyo@mvschools.org>

Hi there,

I'm very happy with the current MVMS site to get renovated, but my big concerns there are:

1) making sure it has seismic updates done to it – this really stood out to me as an issue for doing this big project and not having it be updated for earthquake safety.

2) There are a lot of people who are pushing for students to be off campus while construction is going on, and I think we will have fewer lawsuits if the temporary location for MVMS is at Lomita. That said. I'm personally happy with either temporary location – Current location or Lomita.

Thank you!

Lauren Weitzman

Responses to Lauren Weizman Comments

Please see Master Response 1.

As clarified in the Final EIR, Alternative 5 would not renovate either the existing building or foundations to meet current building code seismic requirements. Even so, the potential for seismic hazards would remain low in part due to the protections afforded under the legal framework applicable to the original construction. The Renovation The Mill Valley Middle School campus was built in 1972 under the Field Act, one of California's strongest and most successful school safety laws. The Field Act requires all public school buildings to be designed by licensed architects and structural engineers, reviewed and approved by the Division of the State Architect (DSA), and inspected during construction to verify compliance with rigorous seismic standards. Since its adoption in 1933, no Field Act–compliant school building has collapsed or caused student injury in an earthquake.

With respect to the seismic safety of the Interim Campus at the MVMS site, the proposed foundation design has been reviewed by the California Geological Survey on behalf of the State Architect and determined to be appropriate to address seismic hazards including settlement and liquefaction[16].

[16] California Department of Conservation, California Geological Survey, Letter to Elizabeth Kaufman, Superintendent, Mill Valley School District, November 12, 2025, *Second Engineering Geology and Seismology Review for Mill Valley Middle School - Proposed Interim Campus. 425 Sycamore Street, Mill Valley, CA*. CGS Application No. 01-CGS6942.

223. Peter Luber Comments

Mill Valley School District

The proposal to have kids from the middle school utilize space at Edna or any other facilities located on Lomita is preposterous. The traffic pattern down Lomita from 8 - 8:45am in the morning is already at or near capacity. There is only one road in and one road out and it is a single lane road with no bike lane and deteriorating sidewalks. Adding additional students, especially to the magnitude being considered, would send a traffic jam back to Blithedale. Movement anywhere in that area, such as the highway for commuters, will be all but impossible for at least 45 minutes in the morning. There are also no speed bumps on Lomita and the sidewalks are hazards in and of themselves. There is barely infrastructure to accommodate the existing student body. Edna is very isolated with very few access points unlike the Middle School which can be accessed from all sides, the only easy access to Edna is from the south facing side. Sending middle school kids to Edna is literally the dumbest idea I've ever heard of in my 8 years living in Mill Valley. You people must be kidding. While you're at it, why not move a runway from SF Airport to Friend's field?

There are a gazillion better solutions than trying to cram 1200 students into EDNA or neighboring buildings.

1. Utilize the existing middle school land to put up temporary class rooms while the main school is remodeled. The temporary classrooms at Tam High are amazing. Actually better than the existing class rooms.
2. If there isn't enough temporary classroom capacity to accommodate all 3 grades, move 6th graders to each of the elementary schools in the district (Edna, Park, Old Mill, Tam Valley and Strawberry). This would effectively expand each elementary school to K - 6 (like it is done in many other elementary schools around the country) and utilize each school's limited classroom and neighborhood capacity. Maybe the district ends up keeping that structure if it works?

The upshot is MVMS has been at that location for decades and it worked just fine. In fact, the middle school probably has the greatest traffic throughput than any of the other schools in the district. There is ample land and ample access points. A remodel can happen without moving any dirt if that's the real problem (and I suspect it really isn't but I'm not a scientist). Without a doubt, if the district decides to move MVMS or any portion to Lomita, there will be a litany of lawsuits and nothing will ever happen anyway. Nobody, I'll repeat Nobody (except a few disgruntled families that are probably going to send their kids to private school anyway) wants this. The district will mobilize the entire population of Mill Valley in opposition.
Happy to discuss at your convenience.

Best,

Peter

Responses to Peter Luber Comments

Please see Master Responses 1 and 3.

224. Quinn Rogers Comments

From: **Quinn Rogers** <quinnluber@gmail.com>
Date: Tue, Oct 14, 2025 at 10:38 AM
Subject: Proposed Middle School at 70 Lomita Dr
To: jarroyo@mvschools.org <jarroyo@mvschools.org>

Hello,

Thank you for your consideration and hearing my concerns.

I am an Edna parent at live at 16 Somerset Lane near Lomita. Parent of a 2nd grader and Tam Senior.

I have lived in Mill Valley for 20 years and have seen the increase of traffic to our town and how the school bells dictate a lot of our towns traffic.

This small neighborhood can not withstand the amount of traffic that a middle school would bring.

The current Middle school location has many options to get in and out of the campus. Both roads have large stop lights on the sides to manage the flow.

We already can not maintain light build up on the street. See attached pic of last week. When blithdate is backed up many come through Lomita.

And for safely it appears it was be chaos in an emergency.

Appears this would not even be on the table if it wasn't for a very outspoken and legal heavy group who are not concerned about how this would affect the quality of life for many tax paying and kiddos supporting families.

Quinn Rogers
Director Natl Accounts on Premise
Delicato Family Wines



Responses to Quinn Rogers Comments

Please see Master Responses 1 and 3.

225. Penny Kweder Comments

From: **onecent95@comcast.net** <onecent95@comcast.net>
Date: Tue, Oct 14, 2025 at 2:23 PM
Subject: 425 Sycamore
To: <jarroyo@mvschools.org>

>> I live at 95 Lomita Drive, Mill Valley. I have lived at this address since 1980. I endured the two years, and the filth, that it took to tear down, and rebuild Edna McGuire Grammar School.
>>
>> I highly opposed another school being built in my small neighborhood. Lomita is the thoroughfare to Edna School. I have to watch out, coming and going at school drop off, and pick up times because of the traffic. I am at peace with that. My Grandchildren attend Edna School. One school is enough.
>>
>> One letter to the editor stated that there are only 4 acres of property to build a middle school on, where there are 14 acres at 425 Sycamore. That location makes so much more sense. Bringing 3, 4, or 5 grammar schools together in one location, with two lanes approaching it, is so much easier than coming into a small neighborhood with only 1 lane each way.
>>
>> Once during the morning school traffic I had an emergency at my house. It took the police and ambulance several minutes longer because the cars were not getting out of the way soon enough. I would never want to repeat that horror again. It was bad enough as it was.
>>
>> And to think of all those children, yes, they are still children, riding their e-bikes to school down my street everyday……well I can not even imagine it.
>> I would probably sell my house and move elsewhere. That is how strongly I am against this idea.
>>
>> If there is a problem with the soil at the current Middle School, then clean it up! Seems to my my children attended Middle School, and the condition of the soil has not seem to have impacted them in any way.
>>
>> Sincerely
>> Penny Kweder
>> 10/14/25

Responses to Penny Kweder Comments

Please see Master Responses 1, 3, and 4.

226. Shanta Delacrose Comments

From: **shanta Delacrose** <dearshanta@gmail.com>
Date: Tue, Oct 14, 2025 at 2:06 PM
Subject: MVMS renovation project
To: jarroyo@mvschools.org <jarroyo@mvschools.org>

Dear Mr. Arroyo,

I am directing my comments here in hopes of making an impact for the impending decision regarding the MVMS renovation project. As a mill valley parent, I have been concerned about the location of the middle school and have two kids who have graduated from there. I have one more who is in elementary school now and will likely go to MVMS where ever it ends up. After careful consideration of this project I strongly feel that because of the negative community impact and lack of emergency and fire exit safety I am opposed to moving the location of MVMS to the Edna campus. The location at Edna is tucked away in a place in mill valley that cannot handle the level of traffic, parking or emergency exits needed to house the majority of our mill valley children. The west American taekwondo and after care are also a treasured part of the mill valley community. The impact on these programs which support mill valley families and often underserved youth would be damaging. Many families rely upon west America taekwondo and Edna aftercare as an extension of their own family. Many walk or bike to the location out of necessity given its proximity to them. We are one of those families. To uproot West America taekwondo and Edna aftercare would have deleterious effects on these programs and our community. My high school son works for Edna after care and my second grader is part of the west America Taekwondo family. Having these programs and community for them is instrumental in their development. A shift to this dynamic would affect both of them negatively. I would appreciate you taking these factors into consideration in the impending decision. Thank you very much for your time.

Sincerely,
Shanta Delacrose
Mother of three mill valley children

Response to Shanta Delacrose Comments

Please see Master Responses 1, 2 and 3.

227. Mark Simmons Comments

From: **Mark Simmons** <mark.g.simmons@gmail.com>
Date: Tue, Oct 14, 2025 at 2:04 PM
Subject: Public Comment on Mill Valley Middle School Modernization Draft EIR
To: <jarroyo@mvschools.org>

Hi Julio,

I am the parent of a 1st grader at Edna Maguire and 3 year old who will attend Edna Maguire soon and we live in the Scott Valley neighborhood. I support renovating the existing middle school building rather than building new facilities at 70 Lomita.

Key Concerns with 70 Lomita:

Traffic & Parking: Building at 70 Lomita would flood Lomita Drive with excessive traffic, burdening surrounding neighborhoods including Scott Valley. The site lacks sufficient parking for the population increase from 500 to 1,350 students/staff, especially with plans to remove 43 existing parking spaces.

Site Inadequacy: At only 4 acres, 70 Lomita cannot adequately house a middle school compared to the current 14-acre site. Elementary and middle schoolers would be forced to share play spaces and gyms, which is developmentally inappropriate.

Community Disruption: Edna Maguire was just renovated in 2014 and shouldn't face another major disruption. The beloved taekwondo studio and aftercare program would be displaced, removing an important community resource families rely on.

Educational Impact: Middle schoolers should remain together in one location to build community before high school, not be split between sites.

Benefits of Renovation:

- The EIR confirms renovation with on-site portables is safe
- New HVAC systems can address any odor concerns
- Maintains central location supporting walking/biking to school
- Leverages the most appropriate site size per state guidelines

Please include these comments in the Draft EIR under my name.

Thank you,

Mark Simmons

Responses to Mark Simmons Comments

Please see Master Responses 1- 4.

228. Caitlin McSunas Comments

From: **Caitlin McSunas** <caitlinmcsunas@gmail.com>
Date: Tue, Oct 14, 2025 at 2:32 PM
Subject: Please Keep West America TKD in Its Home
To: <Jarroyo@mvschools.org>

Dear Mill Valley School District Board,

I'm writing to strongly urge you to not displace West America TKD and After Care from its Lomita Dr. location.

I am a parent of a current West America TKD student and a Mill Valley native. When I grew up in Mill Valley, many of my friends attended West America TKD and still talk about their positive and transformative experiences inside the Dojo. It is important that our community value, treasure and preserve this family run business and institution that has served and continues to serve our children, families and schools for decades. The history inside the dojo reflects the deep love and care that the instructors at West America TKD pour into their students and families every single day.

Please find a solution that allows the middle school renovation to move forward without forcing West America from the home it has built within this community.

Thank you for your time,

Caitlin McSunas

Response to Caitlin McSunas Comments

Please see Master Response 2.

229. Megan Harju Comments

From: **Megan Harju** <mshih15@gmail.com>
Date: Tue, Oct 14, 2025 at 2:48 PM
Subject: Concerns about the MVMS modernization project at Edna
To: Jarroyo@mvschools.org <Jarroyo@mvschools.org>

Hello,

I am a parent in the MVSD and would like to express my thoughts AGAINST construction of the middle school at Edna and subsequently displacement of other structures, including West American Taekwondo.

This site is not big enough to accommodate the Middle School and will not be a good long term solution. I urge you to please push for remodeling at the Sycamore location.

Thank you,

Megan

Responses to Megan Harju Comments

Please see Master Responses 1and 2.

230. Fabien Renaud Comments

From: **Fabien Renaud** <fabienrenaud.fr@gmail.com>
Date: Wed, Oct 15, 2025 at 12:00 AM
Subject: Public Comment on MVMS Modernization – Against Alternative 2
To: <Jarroyo@mvschools.org>

Dear Director Arroyo and Members of the Board,

I write to submit public comment about the *MVMS Modernization Alternative 2* (constructing a new middle school at 70 Lomita) and the implications of making that location a permanent campus. I am not categorically opposed to Alternative 2 **if** it is used **temporarily** while MVMS on its existing 18-acre site is rebuilt. However, making the new Lomita campus *permanent* without very significant changes to traffic (in scale that I do not believe you have the budget for) raises some serious practical and safety concerns.

My main points are as follows.

31) **Traffic congestion and safety hazards**

- The Lomita/Edna Maguire site is in a corner / dead-end-type configuration; increasing student volumes there permanently will certainly worsen congestion of an area already plagued by school-time traffic.
- Given its less central location, more students will be driven, more will come biking through the 1 bike lane (or on the road), further increasing congestion and safety hazards. I wouldn't bet on shuttle transit as a mitigation to be that effective. This is Mill Valley, most won't take it and will prefer the convenience of cars or bikes.
- Emergency egress and exit/entrance points are limited; adding more students increases risk in case of emergencies. In my view, creating such a major combined campus there would require at least 2 more access/exit roads: one with direct access to Camino Alto, and a separate one leading to Meadowcrest.

2. Community displacement / impact on West America community

Displacing/relocating West America would affect students from all Mill Valley schools (elementary to high school). Mostly, it would negatively affect students at Edna and their families who only need to cross the street to be in Aftercare. If not all students can use

shuttles to go to the new WestAmerica location, parent car trips will increase, further burdening transportation and safety.

6. **Smaller, less central middle campus = negative branding / property value risks**

- The current 18-acre MVMS site is centralized and has amenities and space. Downsizing to a permanent middle school campus that is much smaller (similar in scale to many dense urban middle schools) and less central could reduce the attractiveness of Mill Valley for families choosing location in part for school quality/site quality.

- For example, this study https://arxiv.org/abs/2507.19934 finds that greener schoolyards correlate with higher property values. If the new campus is tighter on space, less green/open space, that could reduce those positive "green schoolyard" effects.

- Immediately impacted would be the Sycamore neighborhood – which already lost its local Whole Foods -- with its currently amazing close proximity to multiple elementary schools and MVMS.

In conclusion:

- I am **opposed to alternative #2** as currently defined, i.e. the construction of a permanent new campus at 70 Lomita.

- I would potentially be in favor of an alternate proposition building a temporary campus at 70 Lomita (with traffic accommodations I mentioned) while the brand new and permanent one is built on the current 18.5 MVMS site (but you do not seem to have the budget for that).

- My preference goes to alternative #1. Even better, I would personally prefer to see the entire campus being rebuilt to satisfy all requirements, even if that means raising additional funds to do so.

Thank you for all the effort you have put into the Draft EIR and modernization planning for Mill Valley Middle School. I hope you will consider the points hereabove. I believe it's possible to get the benefits of this modernization project without sacrificing the long-term community, safety, and equity values that make Mill Valley special. I hope the Board will adopt a plan that reflects those trade-offs carefully.

Sincerely,

Fabien Renaud
933 Alturas Way, Mill Valley
Local homeowner, and parent of a former MVMS student.

Responses to Fabien Renaud Comments

Please see Master Responses 1-4. Financial issues such as property values are not CEQA environmental issues, and therefore not required to be addressed in an EIR.

231. Adrian James Comments

From: **Adrian James** <adrianjames@gmail.com>
Date: Tue, Oct 14, 2025 at 10:28 PM
Subject: Writing in support of Alt 1 (current location)
To: <jarroyo@mvschools.org>

Hi Julio,

Thanks for all your work on Measure G!

I'm a huge fan of remodeling at the **current location** (Alt 1). I want this project to get moving! I've got kids in 8th, 6th at MVMS, and 4th grade at Edna.

For what it's worth, the proposal to use the Edna / Terra Marin area makes no sense to me. The Alto neighborhood can barely handle the traffic from 400 Edna students!

Best,

Adrian

Response to Adrian James Comments.

Please see Master Response 1. Please also see Master Response 3 for a general discussion regarding transportation impacts.

232. Stuart Poole Comments

From: **Stuart Poole** <stuartwpoole@gmail.com>
Date: Tue, Oct 14, 2025 at 9:41 PM
Subject: Support Remodel at current location – 425 Sycamore
To: jarroyo@mvschools.org <jarroyo@mvschools.org>

Dear Julio and the MVMS team,

I have a 2nd grader and a 5th grader – both will be going through the Middle School in the coming years.

I strongly vote for a remodel at the current location at 425 Sycamore.

Here's why?

26) **The central location** of the middle school is fantastic for ALL residents. **More kids bike or walk** to MVMS's current location, than would go to Terra Marin.

- Biking and Walking are CORE elements of childhood freedom/development.

2) **The traffic** is already very bad trying through Blithedale to Lomita to get to Edna McGuire. I can't imagine the traffic with more volume going to that area.

3) **Neighborhood impact is significant**. It's a residential neighborhood and it's already burdened with Edna MaGuire traffic.

Thanks. Good luck with the discussion.

I recommend copying and pasting every comment into ChatGPT and having it spit out 5 themes for people in favor of 425 Sycamore and 5 themes of people in favor of Terra Marin.

Thanks, Stuart Poole

Father of Marcus (7) & Owen (10).

Response to Stuart Poole Comments

Please see Master Response 1. Please also see Master Response 3 for a general discussion regarding transportation impacts.

233. Emily Buskirk Comments

From: **Emily** <emilybee55@gmail.com>
Date: Tue, Oct 14, 2025 at 9:15 PM
Subject: Fwd: Public Comment on Mill Valley Middle School Modernization Draft EIR
To: <jarroyo@mvschools.org>

Hi Julio,

I am a Mill Valley School District parent commenting on the Mill Valley Middle School Modernization Draft EIR. I support renovating the existing middle school building rather than building new facilities at 70 Lomita.

Key Concerns with 70 Lomita:

Traffic & Parking: Building at 70 Lomita would flood Lomita Drive with excessive traffic, burdening surrounding neighborhoods. The site lacks sufficient parking for the population increase from 500 to 1,350 students/staff, especially with plans to remove 43 existing parking spaces.

Site Inadequacy: At only 4 acres, 70 Lomita cannot adequately house a middle school compared to the current 14-acre site. Elementary and middle schoolers would be forced to share play spaces and gyms, which is developmentally inappropriate.

Community Disruption: Edna Maguire was just renovated in 2014 and shouldn't face another major disruption. The beloved taekwondo studio and aftercare program would be displaced, removing an important community resource families rely on.

Educational Impact: Middle schoolers should remain together in one location to build community before high school, not be split between sites.

Lack of cultural resources: I understand that there are Native American remains at 70 Lomita that would be disturbed by building.

Benefits of Renovation:

- Keeps the MVMS is a central location
- The EIR confirms renovation with on-site portables is safe
- New HVAC systems can address any odor concerns
- Maintains central location supporting walking/biking to school

- Leverages the most appropriate site size per state guidelines

Please include these comments in the Draft EIR under my name.

Thank you,
Emily Buskirk
214 Beryl Street, 94941

Responses to Emily Buskirk Comments

Please see Master Responses 1-4. Cultural Resources issues associated with the Lomita site are addressed in the Chapter 5 of the EIR, with additional information added in this document.

234. Steve and Dana Rieger Comments

From: **Steve Rieger** <steverieger32@gmail.com>
Date: Tue, Oct 14, 2025 at 7:06 PM
Subject: MVMS input – 10/14/25
To: <jarroyo@mvschools.org>, <ekaufman@mvschools.org>

Good evening,

We would like to weigh in on the decision for the new Mill Valley Middle School. We raised four sons in Mill Valley, we live on Lois Court right behind Edna Maguire. All of our boys went to Edna, then MVMS and then on to Tam High!

We are very happy with the public school education that they received. Roughly 13 years ago, we wholeheartedly supported demolishing the old Edna and building a new campus, even though it was quite disruptive to us for a few years, as the school was literally right over the fence. We knew the campus had become outdated, and the kids needed a better place to learn.

We supported the recent bond measure for the new middle school, and look forward to it being used fir Option One, to renovate the existing campus. The current school location is ideal for people coming from all around Mill Valley, situated on a main road, and the campus size supports the number of students it has today with room for growth. Option two to build a new campus next to Edna McGuire and shoehorn it in seems like a very poor alternative. Having middle school students sharing space with children as young as kindergarten is not in any of the students best interest. The middle school kids would have to cross Edna campus to get to Alto field where as now they have quick and easy access to Friends Field.

Thank you for listening to our input, you have our full support for the current MVMS campus renovation… That seems very exciting for the generations of middle schoolers to come! :o)

Best regards,

Steve & Dana Rieger
20 Lois Ct.
MV

Responses to Steve and Dana Rieger Comments

Please see Master Response 1.

235. Sabrina Simon Comments

From: **Sabrina Sinton** <ssoulis11@gmail.com>
Date: Tue, Oct 14, 2025 at 6:55 PM
Subject: Draft EIR Comment
To: <ekaufman@mvschools.org>, <jarroyo@mvschools.org>
Cc: <cboc@mvschools.org>, <ptacouncil@mvschools.org>

Dear Dr. Elizabeth Kaufman and Mr. Julio Arroyo,

My name is Sabrina Sinton, and my family of four moved to Mill Valley before our daughter started kindergarten because of the exceptional reputation of the school district. Both of our children attended Old Mill Elementary, and we are truly grateful for the wonderful education and community they experienced there.

In 2021, I was diagnosed with stage 3, grade 3 breast cancer and underwent a year and a half of treatment. When it came time for our daughter to begin middle school, we chose to enroll our children in an independent school, partly due to the uncertainty surrounding the potential modernization project. While I may never know what caused my cancer, I am committed to minimizing my children's exposure to environmental toxins. This is why I am deeply concerned about the health and safety of students and staff given the site's documented contamination.

Before moving forward with any project approvals, I urge the District to ensure that all relevant information is fully reviewed and disclosed — including completion of soil testing, mitigation plans, and confirmation that the site meets seismic and environmental safety standards.

I share and support the concerns raised in the *MVMS Modernization Mess* public comment letter, and I respectfully ask that the District meaningfully address the requests outlined there. I also encourage the District to seriously consider the Edna Maguire site as a potentially safer and more cost-effective alternative.

As a taxpayer, I want to see public funds invested wisely in a lasting facility — but above all, I want to ensure that the health and safety of our children, teachers, and community remain the top priority.

Thank you very much for your time and consideration.

Sincerely,
Sabrina Sinton

Responses to Sabrina Simon Letter

Please see Master Response 1. MVMS Modernization Mess comments referred to in the comment are addressed in responses to Comment # 187, above.

Extensive soils testing at the Project site has been conducted and is under review by the California Geological Survey on behalf of the Division of the State Architect, which is responsible for review and approval of all school construction projects. Issues associated with handling of contaminated soil are addressed in the hazards and Hazardous Materials chapter of the EIR.

With respect to Alternative 5, the renovations would include a vapor intrusion mitigation system (VIMS) to prevent soil vapor hazards inside the building. Seismic hazards would be similar to existing conditions. The Field Act was introduced in 1933 along with other laws that banned the construction of unreinforced masonry buildings, and required that earthquake forces be taken into account in structural design. The Act also established the Office of the State Architect (now Division of the State Architect or DSA) which developed design standards, quality control procedures, and required that schools be designed by registered architects and engineers. These professionals must submit their plans and specifications to the State Architect for review and approval prior to construction. The same professionals were also required by the Act to periodically inspect the construction while underway and verify that the actual work completed is in compliance with the approved drawings. Peer review and inspection requirements were also introduced as another quality control procedure.

Since 1940, no building constructed under the Field Act has either partially or completely collapsed, and no students have been killed or injured in a Field Act compliant building. As such, to guide renovation of the buildings designed under Field Act requirements, the California Administrative Code establishes the 50% replacement cost threshold for the evaluation and retrofitting of structural systems as noted below. Additionally, this requirement can be triggered when seismic weight or wind loads are increased by more than 10% from the original construction and/or impacts on the lateral force resistance of more than 10% due to modifications to the structure. The renovation proposal for Mill Valley Middle School would not exceed that 10%.

With respect to the seismic safety of the Interim Campus at the MVMS site, the proposed foundation design has been reviewed by the California Geological Survey on

behalf of the State Architect and determined to be appropriate to address seismic hazards including settlement and liquefaction[17].

[17] California Department of Conservation, California Geological Survey, Letter to Elizabeth Kaufman, Superintendent, Mill Valley School District, November 12, 2025, *Second Engineering Geology and Seismology Review for Mill Valley Middle School - Proposed Interim Campus. 425 Sycamore Street, Mill Valley, CA*. CGS Application No. 01-CGS6942.

236. Abigail Pease and Loren Siebert Comments

From: **Abigail Pease** <abbypease@yahoo.com>
Date: Tue, Oct 14, 2025 at 6:54 PM
Subject: Please move ahead with rebuilding our middle school!
To: <jarroyo@mvschools.org>
Cc: Loren Siebert <loren@siebert.org>

We are parents of a current MVMS students and are writing in support of the plan to build the middle school on the current site, reducing further waste of funds and ensuring a timely conclusion to the project.

We are frustrated with the delay, and waste of time and tax funds taken up by debating site and other issues. Please move forward as quickly as it is possible to do.

Thank you –

Abby Pease and Loren Siebert

Response to Abigail Pease and Loren Siebert Comments

Please see Master Response 1.

237. Kara Merski Comments

From: **Kara Merski** <kmersk@gmail.com>
Date: Tue, Oct 14, 2025 at 6:52 PM
Subject: Statement Regarding Proposed Middle School Relocation to Edna Maguire Campus
To: <jarroyo@mvschools.org>

To Whom it May Concern:

As both a parent in the Mill Valley School District and a resident of the Edna neighborhood, I am strongly opposed to relocating the middle school to the Edna Maguire campus.

The site is simply not suitable for a middle school. It is too small to safely accommodate both elementary and middle school students, and it lacks the space needed for essential facilities like separate play areas, athletic fields, and future expansion. Combining two schools on one constrained site will create serious safety and logistical issues.

Additionally, the traffic impact on the surrounding neighborhood would be unacceptable. Edna streets are already congested during drop-off and pick-up. Adding middle school volume will overwhelm local roads, create bottlenecks, and put both students and residents at risk. As a neighbor, I can say with certainty: our streets cannot handle this.

In addition, relocating the middle school would lead to higher costs, unnecessary delays, and the disruption of valuable community programs already operating at Edna. It's a fiscally irresponsible move that compromises educational quality and neighborhood safety.

In sum: **we cannot build the middle school at Edna Maguire**. It is too small, unsafe, fiscally reckless, and disastrous in terms of traffic and neighborhood quality. As both a parent and neighbor, I cannot stand by as this flawed alternative is given serious consideration.

I strongly urge the Board to certify the Final EIR and approve **Alternative 1 (renovation at Sycamore Drive)** without further delay. Our children's safety, our neighborhood's livability, and the integrity of our tax dollars depend on it. Thank you.

Kara Merski
Mill Valley School District Parent
Resident, Alto Sutton Neighborhood

Responses to Kara Merski Comments

Please see Master Responses 1 and 3.

238. Brooklyn Beard Comments

From: **Brooklyn Beard** <unicorn575@icloud.com>
Date: Tue, Oct 14, 2025 at 5:51 PM
Subject: MV Middle school site – my student opinion
To: <kbrenner@marinij.com>
Cc: <jarroyo@mvschools.org>, <ekaufman@mvschools.org>, <LetterstotheBoardofTrustees@mvschools.org>, <BreakingNews@kron4.com>, <cboc@mvschools.org>, <communications@mvschools.org>

Hello my name is Brooklyn Beard and I am a 6th grader at MVMS. Me and my friends have all agreed that the middle school should not be built where Edna Maguire is. I know that area well I went there for 6 years. It was a great 6 years even during the pandemic the teachers made zoom classes fun. The area is surrounded by Horse Hill on one side and neighborhoods and Scott Valley swim and tennis club on all the other sides. Edna Maguire was not built for middle school kids who have 6 or 7 different classes and teachers a day.

Where would all the Edna kids go? Would they be spread through different schools far away from their house or would they all be crammed into an even smaller school? If some are sent to the old Terra Marin school putting the middle school kids in Edna just imagine the morning traffic (which is already bad)? Don't even get me started on an evacuation, all those cars or emergency vehicles in Edna's little parking lot would be very dangerous with those nervous parent drivers.

So far, I really like my 6th grade year here at MVMS (besides the homework). The halls and gym are big, the teachers are great and the staff is nice. We have a great outdoor space that could be redesigned better with student ideas. Just ask us. The outside of the MVMS building is boring and depressing to look at. If it had some pops of color, or murals, or art pieces school would feel more colorful and exciting. Don't get me wrong, it's not bad now but it could be better with just adding color.

If MVMS gets remodeled (because it can't be torn down) we will have good filtration systems that will help us not be bothered so much by the smell. We're not worried about the soil because it's already been tested as safe and we're not EATING the soil. If people are worried about earthquakes you know they will happen no matter where the school is.

We've been waiting for years for a new middle school that we have never gotten. It could have been done by now. When will we get to have a new learning experience? I

know that my 6th grade classmates and I will NOT get to enjoy it but I want my younger brother and his friends to get to experience it.

I think you should listen to the opinions of the kids and students because our voices are equally as important as the adults.

Sincerely,

Brooklyn Beard 6th grader

Response to Brooklyn Bear Comments

Please see Master Responses 1 and 4.

239. Carly Scholtz Comments

From: **Carly Scholz** <carlyascholz@gmail.com>
Date: Tue, Oct 14, 2025 at 5:17 PM
Subject: MVMS modernization plan
To: jarroyo@mvschools.org <jarroyo@mvschools.org>

Hello Julio,

I am writing as a neighbor of Edna Maguire and the 70 Lomita site. I imagine you've heard lots of my neighbor's voices at this point and I understand there is a petition circulating as well.

Lomita Drive is falling apart, we can't maintain it for the current level of use, there's only one decent stretch of sidewalk and it isn't even contiguous to the school sites. Tower, Meadow, and Shell Roads aren't designed for thru traffic. Doubling the number of families entering and exiting will be uncomfortable and unsafe for everyone, no matter their form of transport.

70 Lomita should not be the permanent home of the middle school, not should it be temporary housing for grades 6-8 while construction happens.

Allowing 6th grade to be housed here in 2 story portables for 18 months to 2 years is probably a doable sacrifice for the neighborhood to get the current middle school renovated.

Thank you,
The Scholz Family
26 Lomita Dr.

Responses to Carly Scholtz Comments

Please see Master Responses 1 and 3.

240. Kathleen McCoy Comments

From: **Kathleen McCoy** <kmccoy0815@gmail.com>
Date: Tue, Oct 14, 2025 at 4:48 PM
Subject: Public Comment on Mill Valley Middle School
To: jarroyo@mvschools.org <jarroyo@mvschools.org>

Hello, I am writing to you to say that I support the Remodel at current location 425 Sycamore.

I DO NOT support middle school at Terra Marin 70 Lomita Drive.

The traffic on Lomita Drive, Shell Road, Meadow drive and Tower Road is already stressing these roads beyond capacity. Most of the area does not have sidewalks and the children and all pedestrians are in undue danger with the contant traffic already burndoning these streets.

Thank you,

Kathleen McCoy
Horse Hill/Alta Bowl resident

Responses to Kathleen McCoy Comments

Please see Master Responses 1 and 3.

241. Bella Kazwell Comments

From: **Bella Kazwell** <bkazwell@gmail.com>
Date: Tue, Oct 14, 2025 at 4:30 PM
Subject: Comment on Middle School plan
To: <jarroyo@mvschools.org>

Hi Julio,

I'm a parent in the Mill Valley school district. I'm in support of the current proposal of rebuilding the middle school and having the temporary housing at the site of the middle school.

Bella Kazwell

Response to Bella Kazwell Comments

Please see Master Response 1.

242. Chantal and Roger Carlon Comments

WEST AMERICA TAE KWON DO
Mill Valley, California
Email: team@westamericatkd.com

October 12, 2025

Superintendent Elizabeth Kaufman (ekaufman@millvalleyschools.org)
Operations Director Julio Arroyo (jarroyo@mvschools.org)
Mill Valley School District
411 Sycamore Avenue
Mill Valley, CA 94941

Re: Mill Valley Middle School Modernization Project – Public Comment
Dear Superintendent Kaufman, Director Arroyo, and Members of the Board:
We are writing on behalf of West America Tae Kwon Do (WATKD), a family-owned and community-based martial arts program that has operated continuously in Mill Valley for more than 40 years. Founded by our late father in 1983, our school has served thousands of local families, offering after-school programs, youth enrichment, and character-based martial arts instruction to generations of Mill Valley students. Many of our students attend Edna Maguire Elementary and Mill Valley Middle School, and our programs have long complemented the District's educational and after-care ecosystem.

Because our facility is located on the Lomita Drive campus (formerly Terra Marin / 70 Lomita), we have followed the District's modernization plans for the Mill Valley Middle School (MVMS) very closely, particularly as they relate to proposed site use, construction alternatives, and temporary student housing. We have carefully reviewed the Draft Environmental Impact Report (DEIR) and the District's preferred alternatives, and we respectfully submit the following formally for the record.

1. Support for Alternative 1 – Rehabilitation of the Existing Sycamore Campus

We strongly support Alternative 1, which proposes to renovate and modernize the existing middle school facility at its current Sycamore Avenue location. Renovating in place minimizes transportation disruptions, maintains central accessibility for students who walk and bike, and preserves existing neighborhood circulation patterns. It also eliminates the need to relocate programs or displace small businesses—such as ours—that operate educational services on District-owned sites.

2. Opposition to Use of the Lomita Campus for Temporary or Permanent Middle School Facilities

We respectfully oppose any plan that would involve constructing a new middle school at the Lomita Drive site, using the Lomita campus for temporary classroom housing during MVMS construction, or repurposing the site for expanded educational or district operations that would necessitate the displacement of existing tenants such as West America Tae Kwon Do. The Lomita property is not suitable for large-scale middle school operations due to its limited acreage (approximately 4 acres compared to the Sycamore site's 18.5 acres) and inadequate traffic infrastructure. The DEIR's findings indicate that this site would suffer from unacceptable Level of Service (LOS) E and F conditions on Lomita Drive during drop-off and pick-up periods—conditions that would severely impact neighborhood access and public safety.

3. Continuity of Educational and After-School Services

West America Tae Kwon Do is not merely a tenant—it is an established educational partner serving Mill Valley families. Our dojo provides structured after-school programs, youth leadership training, and supervised care for local children, including dozens of Edna Maguire and MVMS students. Displacing our facility would remove a long-standing, self-funded community program that supports working families and reinforces the same values taught within the District: respect, discipline, integrity, and personal excellence. We respectfully request that the District's modernization plans explicitly preserve our ability to remain in operation at the Lomita campus, both during and after the MVMS construction process.

4. Environmental and Transportation Considerations

As community users of the area for decades, we have observed that rehabilitating the existing Sycamore site produces the lowest transportation, environmental, and safety impacts among the options under consideration. The Sycamore site's central location minimizes vehicle miles traveled (VMT) and ensures safe, multimodal access for students and staff. By contrast, concentrating more students, staff, and traffic at Lomita would amplify existing congestion on Camino Alto, Blithedale Avenue, and the narrow residential streets surrounding Edna Maguire. It would also strain parking availability and create hazardous conditions for pedestrians and cyclists.

5. **Student Safety and Operational Feasibility**

We believe that renovating the existing MVMS facility (Alternative 1) can be accomplished safely, with all required air quality, seismic, and environmental mitigations in place. Maintaining existing circulation patterns and minimizing off-site displacement is the safest and most operationally sound approach for students, staff, and the broader community.

6. Request for Written Assurance

Given our program's longstanding presence and community service, we respectfully request that the District provide written assurance that West America Tae Kwon Do will be able to continue operating at its current location on Lomita Drive for the duration of the MVMS modernization project and beyond. Our continued operation aligns with the District's commitment to community partnership and student well-being, and our presence on the site offers a proven, stable service that directly benefits local families during after-school hours.

7. Conclusion

We urge the Mill Valley School District to move forward with Alternative 1 – Rehabilitation of the existing Sycamore campus, and to ensure that the Lomita Drive site remains intact and accessible to existing community partners, including West America Tae Kwon Do. We appreciate the District's ongoing engagement with the community and respectfully request that these comments be included in the public record for the Mill Valley Middle School Modernization Project. Thank you for your consideration and for your continued service to the Mill Valley community.

Sincerely,
Chantal Carlon
Co-Owner and Instructor
Roger Carlon, Jr.
Co-Owner and Instructor
West America Tae Kwon Do

Responses to Chantal and Roger Carlon Comments

Please see Master Responses 1, 2, and 3. Relocation of existing businesses is not a CEQA environmental issue.

243. Michael Broom Comments

From: **Michael Broom** <broom00@gmail.com>
Date: Wed, Oct 15, 2025 at 8:53 AM
Subject: Public Comment – Support for Alternative 1: Renovation of the Existing MVMS Campus
To: <Jarroyo@mvschools.org>
Dear Superintendent Kaufman, Mr. Arroyo, and Members of the Board,

I am a resident of Mill Valley, and have one student that graduated from Edna Maguire and one student that is currently in fourth grade at Edna. Both of our children have attended the West America Aftercare Program since Kindergarten, and also have been a part of the West America Tae Kwon Do program.

I strongly support Alternative 1: Renovation of the Existing MVMS Campus. This option is the environmentally superior and educationally sound choice identified in the Draft EIR. It preserves a centralized, accessible campus for all Mill Valley middle schoolers while staying within the Measure G budget and allowing construction to begin as soon as possible.

By contrast, relocating to the Edna Maguire/Lomita site would create severe traffic and safety issues, displace current tenants, reduce field space, and force elementary and middle school students to share an undersized campus that fails state acreage and enrollment guidelines. In addition, it has the potential to significantly disrupt and/or displace the Edna community, as well as displace the valuable after school programs of West America Aftercare and West America Tae Kwon Do.

Our middle school children deserve safe, modern learning spaces now. And our Edna and West America communities should not be disrupted or displaced. Please vote to approve Alternative 1 so construction can begin in 2026.

Sincerely,

Michael Broom

Responses to Michael Broom Comments

Please see Master Responses 1, 2, and 3.

244. Naomi Goodman Comments

From: **Naomi Goodman** <naomisgoodman@gmail.com>
Date: Wed, Oct 15, 2025 at 8:53 AM
Subject: Support for Alternative 1: Renovation of the Existing MVMS Campus
To: jarroyo@mvschools.org <jarroyo@mvschools.org>

Dear Superintendent Kaufman, Mr. Arroyo, and Members of the Board,

I'm a Mill Valley resident and parent with two children at Edna Maguire — one who has already graduated and another currently in fourth grade. Since Kindergarten, both have been part of the West America Aftercare Program, as well as the West America Tae Kwon Do program, which have been integral parts of our school community.

I'm writing to express my strong support for **Alternative 1: Renovation of the Existing MVMS Campus.** This plan is both environmentally responsible and educationally sound, as outlined in the Draft EIR. It maintains a central, accessible campus for all Mill Valley middle school students, stays within the Measure G budget, and allows construction to move forward without delay.

Relocating to the Edna Maguire/Lomita site, on the other hand, would bring a host of serious problems — worsening traffic and safety concerns, displacing existing tenants and programs, and reducing vital field space. It would also require elementary and middle school students to share a campus that falls short of state standards for both acreage and enrollment. Beyond the logistical issues, this move would deeply disrupt the Edna community and threaten the well-established West America Aftercare and Tae Kwon Do programs that so many families rely on.

Our middle schoolers deserve updated, safe classrooms now — without causing unnecessary harm to another thriving school community. I urge you to approve **Alternative 1** so that construction can begin in 2026.

Sincerely,
Naomi Goodman
Mill Valley Resident and Edna Maguire Parent

Responses to Naomi Goodman Comments

Please see Master Responses 1, 2, and 3.

245. Lilly Stamets and Wayne Moskow Comments

From: **Lilly Stamets** <lstamets@gmail.com>
Date: Wed, Oct 15, 2025 at 9:02 AM
Subject: Public Comment
To: jarroyo@mvschools.org <jarroyo@mvschools.org>
Cc: Courtney Gaiman <courtneygaiman@gmail.com>, Lilly Stamets <lstamets@gmail.com>

Subject: Public Comment on Mill Valley Middle School Modernization Draft EIR

Hello Julio,

I am a Scott Valley neighbor commenting on the Mill Valley Middle School Modernization Draft EIR. I support renovating the existing middle school building rather than building new facilities at 70 Lomita.

Key Concerns with 70 Lomita:

Traffic & Parking: Building at 70 Lomita would flood Lomita Drive with excessive traffic, burdening surrounding neighborhoods. The site lacks sufficient parking for the population increase from 500 to 1,350 students/staff, especially with plans to remove 43 existing parking spaces.

Site Inadequacy: At only 4 acres, 70 Lomita cannot adequately house a middle school compared to the current 14-acre site. Elementary and middle schoolers would be forced to share play spaces and gyms, which is developmentally inappropriate.

Community Disruption: Edna Maguire was just renovated in 2014 and shouldn't face another major disruption. The beloved taekwondo studio and aftercare program would be displaced, removing an important community resource families rely on.

Educational Impact: Middle schoolers should remain together in one location to build community before high school, not be split between sites.

Benefits of Renovation:

The EIR confirms renovation with on-site portables is safe.
New HVAC systems can address any odor concerns.
Maintains central location supporting walking/biking to school.
Leverages the most appropriate site size per state guidelines.

Please include these comments in the Draft EIR under my name.

Thank you,

Lilly Stamets and Wayne Moskow

Responses to Lilly Stamets and Wayne Moskow Comments

Please see Master Responses 1-4.

246. Diane Wagner Comments

From: **Diane Wagner** <diane@marinhome.team>
Date: Thu, Oct 16, 2025 at 9:34 AM
Subject: MV Middle School project
To: jarroyo@mvschools.org <jarroyo@mvschools.org>

As a long time MV resident and parent and grandparent of kids in the school district we wholeheartedly believe alternative 1 remodeling the existing site is the best decision for our community. It makes the most sense financially and educationally for our students. Thank you for making the right choice and picking the remodeling of the existing site.

Diane and Bob Wagner

Diane Wagner/Marin Home Team

COMPASS
250 E. Blithedale Ste D
Mill Valley, CA 94941

Response to Diane Wagner Comments

Please see Master Response 1.

247. Kailin McCracken Comments

From: **Kailyn McCracken** <kailyn.tan@mac.com>
Date: Thu, Oct 16, 2025 at 6:25 AM
Subject: Public comment re: middle school project
To: <jarroyo@mvschools.org>

Thank you for compiling this feedback.

Our daughter currently attends school at MVMS. Last year she came home with a headache after being exposed to a gas leak in her math classroom. The school needs to be modernized immediately and my concern is that exploring so many alternatives will continue to burn through more of the measure G dollars needlessly.

My family lives in Scott Valley and we support all the points outlined in the letter our HOA has submitted to the board, which I have quoted below and attached to this email. We agree with the following points from our neighborhood association:

"Renovating the school at its current Sycamore location is by far the most transportation-friendly of all the listed Alternatives, as it is central to many of its students, with multiple access routes for bicycles and pedestrians, as many middle school students walk or bike to school. As such, it is also the most environmentally friendly of the Alternatives. The DEIR confirms this statement in Section 5-25, in its discussion of Alternative 4, the other Alternative currently under consideration, constructing a new middle school at 70 Lomita, the Terra Marin site adjacent to Edna Maguire, as follows:

As detailed in a traffic analysis prepared for this alternative (#4, which we oppose): With the added traffic from the middle school, traffic service levels at the school entrance and exit would drop to LOS (level of service) E and F from LOS A with Edna Maguire Elementary School. Long vehicle queues can be expected on Lomita Drive creating problems for residential access in the area and blocking driveways. The added traffic would add noticeable traffic to Lomita Drive, which is a residential street. While this would not necessarily result in hazardous conditions, it would impede neighborhood access during peak drop-off and pick-up times.
NOTE: LOS E is considered unacceptable, F is basically bumper-to-bumper.
And again, on page 5-33, as follows:
Because of the overall reduction in environmental impacts, the Rehabilitation Alternative (#5, which we support) would be considered the Environmentally Superior Alternative.

2. The existing site, at 18.5 acres (inclusive of the entire District property), provides adequate space for physical education, whereas the Lomita site, at 4 acres, is clearly too small; in fact, the Lomita site would be rated as inadequate by State of California

educational standards, which call for 15-25 acres for a school of MVMS's size. Additionally, the existing Sycamore site is large enough to provide for growth of the student body by another 335 students.

3. The Lomita site is more remote, which would increase automobile trips through the most congested and lowest rated intersection in town – Camino Alto and Blithedale. The DEIR addresses this fact in the following excerpt from page 3.10-11, in discussing the (abandoned) Project, but which would have the same effect of keeping the middle school in its current Sycamore location:

The proposed project would continue to service the Mill Valley public middle school student population as does the existing campus and would not result in students attending from other localities that could increase VMT. (Vehicle Miles Traveled.) Further, the Project would be at the same site as the existing school, eliminating any changes in VMT that could occur if the school were to be relocated.

In other words, there would be no impact to traffic at Sycamore, Blithedale, or Lomita, if the MVMS were to continue at the existing site, whether renovated or newly constructed, as there would be if Alternatives 3 or 4, both of which involve relocating the MVMS to the Lomita site, were selected.

4. The Lomita site's access infrastructure is already overburdened, and the streets accessing Edna Maguire are generally in poor condition. As noted, the existing MVMS site at Sycamore provides room for growth for up to an additional 335 students, while the Lomita site is already burdened at 436 students; our neighborhood suffers the consequences of this deficiency – a large group of Edna parents uses the streets in our neighborhood directly above Edna as a pick-up and drop-off sites, creating circulation issues for our constituents at those times.

5. Reconstructing in place eliminates the need to displace West America Tae Kwon Do (WATKD), which provides after-school activities for many Edna Maguire students. Interim Housing. We support the idea of housing MVMS students at the Sycamore site during the construction process for many reasons, among them: a) there are more recreational opportunities for them there, b) there are more services nearby, c) many MVMS students walk or bike to school and could continue to do so much more easily than at Lomita, d) it would reduce traffic impacts on Blithedale and Lomita as documented above"

Responses to Kailin McCracken Comments

Please see responses to Scott Valley Homeowners Association Letter, Comment 192, above. As referenced in those responses, please see Master Responses 1, 2, 3, and 4.

248. Adrienne Power Comments

From: **Adrienne Power, MSPT, PT** <adge114@gmail.com>
Date: Wed, Oct 15, 2025 at 11:16 PM
Subject: Middle school modernization project/EIR comment
To: <jarroyo@mvschools.org>

Dear Julio,

As a parent of 3 future Mill Valley middle schoolers, I would like to weigh in on the MV middle school modernization project and comment on the draft environmental impact report.

Our family felt the EIR was very thorough and much needed. We appreciate that the school board obtained the input of specialists with regard to this project to help the community weigh the benefits of each option.

That said, we feel very confident that OPTION 1, to renovate the existing middle school at the sycamore drive location, is clearly the best for the students and citizens of mill valley.

We'd urge our superintendent and school board to break ground no later than 6/2026 to avoid incurring costs that would detract from the scope of renovations. We are also in favor of keeping 6-8th together at the current site during renovation as well.

We are grateful for the funds approved by voters to ensure students of Mill Valley have an updated Middle School to learn and thrive. Similarly, we thank the MVSD for providing its constituents with the most accurate information and allowing this time for public comment.

Thank you for your consideration,

Adrienne Power

Responses to Adrienne Power Comments

Please see Master Response 1.

249. Andrew and Katey Hoffman Comments

From: **Andrew Hoffman** <aphoffman@gmail.com>
Date: Wed, Oct 15, 2025 at 10:58 PM
Subject: Support for Rebuilding Mill Valley Middle School on Its Current Site
To: jarroyo@mvschools.org <jarroyo@mvschools.org>
Cc: Katey Hoffman <katey.k.hoffman@gmail.com>,
<letterstotheboardoftrustees@mvschools.org>, <ekaufman@mvschools.org>

Dear Mr. Arroyo,

We are writing as current Mill Valley School District parents—current Edna Maguire Elementary parents and future MV Middle School parents—to express our strong support for rebuilding **Mill Valley Middle School on its existing site**, rather than relocating it near Edna Maguire.

We deeply value the culture, community, and experience our children have as current Edna Maguire students, and we do not want to see that environment disrupted by the construction of an entirely new middle school campus adjacent to it. Concentrating two large schools in that area would create significant traffic, safety, and logistical challenges, while diminishing the sense of community that makes Edna Maguire so special.

Additionally, the alternate site simply does not have sufficient space to accommodate a middle school of the size and scope our community needs. Building a new campus from the ground up would also be more expensive than redeveloping the existing middle school site, diverting valuable resources that could otherwise enhance educational programs and classroom experiences. New construction also entails significant risks that could far exceed the budget, particularly when there are impacted cultural sites.

Our family lives near both the current middle school and the sewerage agency, and while the odor can be unpleasant at times, it does not pose a safety concern for students or staff. We feel confident that modern building design and ventilation standards can effectively address any air-quality concerns in a rebuilt facility.

Our family looks forward to the day when our children can attend a modernized, sustainable, and inspiring new Mill Valley Middle School **on its current site**. We urge the District to move forward with this project as soon as possible, reaffirming its commitment to efficient use of resources, balanced community planning, and the well-being of all Mill Valley families.

Thank you for your time and consideration, and for your continued service to our schools and community.

Warm regards,
Andrew and Katey Hoffman
Current Mill Valley School District Parents

Responses to Andrew and Katey Hoffman

Please see Master Responses 1, 3, and 4.

250. Tara Ordonez Comments

From: **Tara Ordonez** <tordonez@mvschools.org>
Date: Wed, Oct 15, 2025 at 9:55 PM
Subject: MVMS Modernization Project
To: Julio Arroyo <jarroyo@mvschools.org>, LetterstotheBoardofTrustees <letterstotheboardoftrustees@mvschools.org>, Elizabeth Kaufman <ekaufman@mvschools.org>

Dear Julio Arroyo, Board Members and Dr. Kaufman,

I am writing as both a parent in the Mill Valley School District for the past 11 years and as a teacher in the district for the last 23 years. I have a current 10th grader, 8th grader, and 4th grader in the Mill Valley public schools. My name is Tara Ordonez and I am writing in strong support of renovating the existing Middle School and using temporary housing on the MVMS campus during construction for the MVMS Modernization Project.

This site has been proven to be safe, and I am confident that it is subject to rigorous regulations and oversight.

As a teacher, I experienced a similar situation when Edna Maguire was rebuilt and we taught in portables during construction. While there were initial concerns about potential disruptions, both students and staff adapted incredibly well. The students were flexible and resilient, and we were able to maintain a strong sense of community and ensure a safe, effective learning environment throughout the process.

The suggestion by some families to relocate the Middle School to the Lomita site reflects a lack of understanding of the potential impact. It's clear that these families are not part of the Edna community nor the surrounding neighborhoods and would not directly face the consequences of such a move—namely, increased traffic, loss of valuable space, lack of space, and many other complications that would arise from relocating nearly 1,000 students and staff to that site.

The most rational, responsible, respectful and safe choice for the Middle School is to renovate the existing school and to house the Middle School Students in portables on the campus. Let's not waste any more money and get started on a project that was slated to start years ago. Thank you for your time and consideration.

Sincerely,

Tara Ordonez

Responses to Tara Ordonez Comments

Please see Master Response 1.

251. Catherine Elder Comments

From: **Catherine Sandusky** <c.sandusky@comcast.net>
Date: Wed, Oct 15, 2025 at 9:05 PM
Subject: Draft EIR Comment
To: <jarroyo@mvschools.org>

To Julio,

I am writing as a community member, Mill Valley homeowner, future MVSD family, and current staff member to support the plan for the middle school modernization to be completed at the current MVMS site.
I do not believe relocating to the Edna Maguire campus is necessary or beneficial to the community.

Thank you,
Catherine Elder

Response to Catherine Elder Comments

Please see Master Response 1.

252. Nathaniel Stone Comments

rom: **502aterial502 stone** <nathanieljstone@gmail.com>
Date: Wed, Oct 15, 2025 at 8:52 PM
Subject: MVMS 2025
To: <jarroyo@mvschools.org>

I am a parent of a current and a future MVMS student. I am writing in support of the plan to build the middle school on the current site, housing students in portables on the MVMS property to reduce further waste of funds and ensuring a timely conclusion to the project.

Thank you

Nathaniel Stone

Responses to Nathaniel Stone Comments

Please see Master Response 1.

253. Eva Ngarangad Comments

From: **eva** <eva.edie7226@gmail.com>
Date: Wed, Oct 15, 2025 at 10:53 PM
Subject: Opposition Email Moving Mill Valley Middle School to Lomita Site
To: <jarroyo@mvschools.org>

My name is Eva Ngarangad and I have lived in Mill Valley my entire life. I also was a student at Edna Maguire Elementary school and Mill Valley Middle School so I am familiar with the area.

When attending both schools, I found it extremely difficult walking to and from school because of the amount of cars in each area. A few times I was even yelled at while crossing the street by adult drivers to "walk faster". Condensing the middle school into the same area as Edna Maguire would be detrimental for the safety of the students and the traffic for the residential area.

Also, when walking past the middle school, I have been called out to almost every time I have walked by when kids are out in the yard. This has included asking what I am looking at on my phone or who I am. The proximity of these two different age groups would affect all of the children in a negative way and should not be done.

Additionally, West America Tae Kwon Do and After Care are important aspects of the community and many families rely on these programs. I think there are better solutions than forcing West America out and putting middle schoolers in a space too small for safety regulation standards.

Thanks,

Eva Ngarangad

Responses to Eva Ngarangad Comments

Please see Master Responses 1, 2, and 3.

254. Kelly Ellis Comments

From: **Kelly Hoppe** <kellymhoppe@gmail.com>
Date: Wed, Oct 15, 2025 at 7:21 PM
Subject: EIR Comment
To: ekaufman@mvschools.org <ekaufman@mvschools.org>, jarroyo@mvschools.org <jarroyo@mvschools.org>
Cc: <cboc@mvschools.org>, <ptacouncil@mvschools.org>

Hello
My name is Kelly Ellis, and I am a parent of two girls at Edna McGuire Elementary. I've been following the middle school project for a couple of years now. After attending the recent meeting and reviewing the EIR, it's clear to me that the results are in and the best option is to **renovate the existing middle school and keep interim housing at that site**.

The data from the EIR showed that this option is completely safe and most feasible option. In addition, the alternative options proposed to build the school or temporarily housing at 70 Lomita Avenue would cause unnecessary problems.

First, there isn't enough space. Parking is already a major issue at Edna, and adding a middle school will only make it worse. My and many other kids already walk and bike to school in an area with poor sidewalks, and more traffic will make it even more dangerous. I'd be very worried about sending them if there were to be more cars on the road then there already is.

Second, the proposed site is just too small—four acres compared to the existing 14 acres.

Finally, we would lose West America, an essential and affordable after-school program. This would leave working families with fewer options and could drive up prices at Bright Horizons, which is already too expensive for families and at capacity.

Please, I urge you to look at the data and not just listen to the loudest voices. Let's make the choice that makes the most sense for our entire community. We need this project to move forward now, so let's get it done.

Thank you

Kelly

Responses to Kelly Ellis Comments

Please see Master Responses 1-4.

255. Ellen Frazier Comments

From: **Ellie Frazier** <emtfrazier@gmail.com>
Date: Wed, Oct 15, 2025 at 6:35 PM
Subject: Support for remodel of mvms
To: jarroyo@mvschools.org <jarroyo@mvschools.org>

Julio,

I write not only as a resident of Shell Road but as a resident of the city of Mill Valley.

A decision to move MVMS to the Edna location would cause massive traffic congestion throughout the entire city. This is only one of the reasons that the move would be unacceptable.

A remodel of MVMS at the current location is the only acceptable decision.

Ellen Frazier

Responses to Ellen Frazier Comments

Please see Master Response 1.

256. Larisa Tempero Comments

From: **larisa tempero** <lara.tempero@gmail.com>
Date: Wed, Oct 15, 2025 at 6:02 PM
Subject: MVMS modernization
To: <jarroyo@mvschools.org>
Good evening,

There can be little doubt that of the two options, rebuilding the school at the current site makes the most sense economically and environmentally. Trying to squeeze a second huge school into a small space and expecting that to work well in a busy neighborhood with limited parking has no hope of success. The only way that could work is if:

a) MVMS were to replace and/or take over the Edna campus… OR
b) New access roads are built to accommodate the massive increase in road traffic in and out of the neighborhood. Perhaps connecting to Scott Valley or widening Lomita. If these were options then maybe it could work

If neither of these scenarios are being considered then building a new MVMS on the area adjacent to Edna with no change to the road infrastructure, the end result will be a total chaotic mess.

Thanks,

Larisa Tempero

Responses to Larisa Tempero Comments

Please see Master Responses 1, 3, and 4.

257. Christina Ferrogiaro Comments

From: **Christiana Ferroggiaro** <c.ferroggiaro@gmail.com>
Date: Wed, Oct 15, 2025 at 5:54 PM
Subject: EIR Comment
To: <jarroyo@mvschools.org>

Hello,

My comment for the Middle School Modernization Project is that I think it's an irresponsible use of taxpayer funds to rebuild/renovate in the current location. The site is situated next to a sewage plant that smells awful at some point of every day, is on top of a capped toxic garbage dump, and in a flood zone that will only worsen with climate change. It seems ludicrous that this is even being considered when there are alternatives.

The alternate plan outlined in ES.5.4 (Edna parking lot/Terra Marin building) is a far stronger option that eliminates all of the above mentioned problems and avoids student dislocation and exposure to potentially toxic demolition/construction. I can't understand why it isn't the primary choice aside from the increase in traffic and reduction of parking at Edna. I would like to point out that both Park and Old Mill have very little parking and are also in residential neighborhoods that have to contend with daily pick-up and drop off. As a result, many kids walk from their homes to school in these communities. One advantage that the Edna/Terra Marin site has is that it's located on a bike path and easily walkable/bikeable from both the MV Community Center and the nearby shopping center so that even kids who do not live in the neighborhood are able to walk or bike if they are dropped off at one of these two locations.

Thanks for your consideration

Christiana Ferroggiaro

Responses to Christina Ferrogiaro Comments

Please see Master Response 1.

258. Carl and Leigh von Rueden Comments

From: **Carl von Rueden** <carl.von.rueden@gmail.com>
Date: Wed, Oct 15, 2025 at 5:30 PM
Subject: DRAFT EIR Comments
To: <jarroyo@mvschools.org>

Hi Julio,

I am writing to comment on the Draft EIR for the MVMS Modernization project. My wife and I have a daughter at MVMS and a 2nd daughter who will attend in 2028. We support renovating the existing MVMS campus on Sycamore Drive.

Thank you,

Carl & Leigh von Rueden

308 Carrera Drive

Mill Valley, CA 94941

Responses to Carl and Leigh von Rueden Comments

Please see Master Response 1.

259. Cindy McCauley Comments

From: **Cindy McCauley** <msf49erfan@comcast.net>
Date: Thu, Oct 16, 2025 at 10:54 AM
Subject: MVMS Comment
To: <jarroyo@mvschools.org>
Dear MVSD Board of Trustees,

I have review the draft EIR as well as other documents concerning the MVMS moderation project and would like to share my thoughts. As a 42 year resident of Mill Valley, parent of 2 former students in the MVSD, past PTSA President at OM, MVMS, and Tam High, I have had a long history with the district and this site in particular. In 2003, I was very involved with a modernization project at MVMS and in fact there is a plaque on the west side of the campus thanking me for the work I headed in that project along with the principal at the time, Whitney Hoyt. I have a pretty thorough understanding of the challenges of the site including landfill issues, pylons under the building, flooding, and a less than accessible school site.

I also was a school board trustee at the TUHSD for 8 years including 2 years as Board President. This was during the last major modernization of Tam High and so I have an understanding of the complexities of this decision. I am very familiar with how to read these reports and understand that there is no perfect answer. I also know the pressure that some parents and staff can exert. In my opinion it is important to look at the long term consequences of your decision on all the parties concerned, the students, staff, and the community at large. Our schools are part of the larger community and it is key to recognize and work with the broader decision makers to pick the best answer. Maybe not the perfect choice but the best choice overall.

With all that said, I highly recommend that you remodel the MVMS campus in its current location. Its location makes it walkable and bike able to a majority of the city. Its access to the Community Center and its fields is adventitious to both students, families, and the district budget (shared use agreement of the fields). The location near Edna Maguire is filled with issues and presents a terrible impact to everyone concerned. In addition given the budget and costs, I think you will end up with a much better school and solution for the future students.

Thank you very much for this opportunity to share my thoughts.

Sincerely,
Cindy McCauley

Responses to Cindy McCauley Comments

Please see Master Response 1.

260. Danielle Miyasato Comments

From: **Danielle Miyasato** <drmiyasato@icloud.com>
Date: Wed, Oct 15, 2025 at 1:34 PM
Subject: Draft EIR Comment
To: <ekaufman@mvschools.org>, <jarroyo@mvschools.org>
Cc: <cboc@mvschools.org>, <ptacouncil@mvschools.org>

Hello All,

As a Mill Valley parent and resident, I am concerned about the health and safety of students (including my twins who are in 5th grade now), teacher and staff at the current MVMS site given the site's documented contamination, smell and future issues with flooding. It makes no sense to invest any more money into this site and I feel that we should invest our money into a sustainable situation, such as at Edna McGuire school site. I agree with the concerns in the MVMS Modernization Mess public comment letter and I would like the district to meaningfully address the requests in that letter. Let's all agree that spending the money we have won a safer and more cost effective alternative is our only logical solution.

Thank you for supporting my family!

Danielle Miyasato

Responses to Danielle Miyasato Comments

Please see Master Response 1.

261. Teresa Joe Comments

From: **T Joe** <tijoe111@yahoo.com>
Date: Wed, Oct 15, 2025 at 2:53 PM
Subject: MVMS Renovation Project Concerns with Alternative 2
To: jarroyo@mvschools.org <jarroyo@mvschools.org>

Dear Mr. Arroyo
I'd like to voice my concerns regarding the Lomita Site option for MVMS renovation project.

- Does not support future Middle School growth requirements
- Have we analyzed the adequately to support Edna McGuire and MVMS outdoor requirements?
- Social impact of locating the elementary school and the middle school next to each other should be addressed
- Social impact of temporarily moving the 6th graders to a different location needs to be addressed
- Impact on Edna McGuire students who currently attend West America TKD after school program

Due to the above concerns along with the cons noted in the August 14, 2025 Board of Trustees I feel it is premature to move forward with the two proposed services:

- Services from Ninyo and Moore for Geotechnical Investigation at Edna Maguire Elementary
- Services from SCA Environmental for Hazmat at Edna Maguire Elementary

Sincerelly,
TERESA JOE
111 WILDOMAR STREET, MILL VALLEY, CA. 94941

Response to Teresa Joe Comments

Please see Master Response 1. Social impacts are not required to be assessed under CEQA, which focuses on physical environmental impacts. The comment's preference for not moving forward with additional soils and hazardous materials studies at this time is noted.

Please also see Master Response 2.

262. Bob Gunnell Comments

From: **Bob Gunnell** <bobgunnell@hotmail.com>
Date: Wed, Oct 15, 2025 at 1:57 PM
Subject: Middle school
To: jarroyo@mvschools.org <jarroyo@mvschools.org>

My view of the middle school modernization project is that to relocate the middle school to Lomita Dr. would be a huge mistake. The area is already over crowded and dangerous for pedestrians, bikers and cars getting in and out of the area. The current location is more centrally located (a really good thing) and has wider streets leading to the school as well as a red light, which is safer for students. The current location is plainly more accessible for students that bike, as well as those on foot. My vote, if I had one, would be to keep the middle school at the 425 Sycamore location.

Thanks,

Bob Gunnell

Response to Bob Gunnell Comments

Please see Master Responses 1 and 3.

263. Christy Atkisson Comments

From: **Christy Atkisson** <christydguzman@gmail.com>
Date: Wed, Oct 15, 2025 at 1:30 PM
Subject: Comment on MV Middle school Modernization.
To: <Jarroyo@mvschools.org>

Whom It May Concern,

I strongly urge the Mill Valley School Board of Trustees to select the current Mill Valley Middle School (MVMS) location at 425 Sycamore Avenue as the site for the future middle school and temporary housing during construction. This location is clearly the logical, fiscally responsible, and environmentally sound choice for our community.

In contrast, the alternative proposal to relocate the middle school adjacent to Edna Maguire Elementary School, on the Terra Marin site, presents numerous serious concerns that would negatively impact students, staff, parents, and surrounding neighborhoods.

In passing Measure G the taxpayers approved the use of funds to upgrade the middle school at its current location. This idea of moving the middle school was not voted on by the community and I'm sure would not pass if voted on now.

There are multiple reasons why the Edna site is not a good fit for a Middle school location. These are my main concerns

- The lot size does not meet the California Department of Education guidelines for a TK-8 campus. The current MVMS site is suitable for a 6-8 site. Why would we try to overcrowd an elementary School? Adding this many students doesn't allow for increased enrollment that will likely come in the next 10 years as babyboomers move on and housing inventory increases.

- Edna is not centrally located in the city. This would negatively impact traffic patterns across the city and add more cars, bikes and pedestrians to an already congested neighborhood with only one lane of traffic, and inadequate sidewalks for safe routes to school. Even with use of bike paths, students walking and riding to the middle school would have to cross traffic at the Edna carline entrance.

- The neighborhood surrounding Edna is prone to flooding and has terrible cell reception. This combined with the aforementioned traffic congestion creates

hazardous conditions in the event of the need for evacuation during any emergency, including storms, tsunamis, fires, and active shooters. Proposed bussing and staggered start and finish times does not solve this problem.

- There has been no ingress/egress study on this neighborhood and as such choosing this neighborhood rather than a site on a main thoroughfare is irresponsible.

- Moving the middle school displaces West America TKD and aftercare–a small business that has been a vital part of the community for over 40 years and one that many working parents depend on for affordable aftercare.

- The Edna site is an archaeologically sensitive area. During its last renovation, Coast Miwok artifacts were discovered, confirming the location of a historical Tamal village. A 2025 study reaffirmed the site's significance. Further construction would risk additional discoveries, which could delay or even halt the project entirely. My 3rd grader is currently studying Miwok heritage while her district is actively evaluating a plan to disturb and or destroy it. This mixed message highlights our society's need to start walking our talk.

- Both Edna and MVMS are open campuses. Adding 756 students creates a campus of 1200 students. It's hard enough now to identify what kids and adults belong there on a daily basis. Moving upwards of 1000 people with MVMS staff from a 14 acre campus, to a 9 acre campus where there will be close to 1200 kids, and where elementary and middle schoolers will share buildings and fields opens up the potential for real risk. Just 2 years ago there was an instance of a man exposing himself in the girls bathroom at MVMS. And while I know horrific things like this could happen anywhere, keeping our campuses small makes it more manageable to mitigate these types of risks.

And most importantly, the Draft EIR is clear in demonstrating that interim housing on the middle school campus is safe and meets all safety guidelines and outlines with environmental and safety mitigation that remodeling the middle school will require.

The bottom line is that testing reveals that this project can be done within the standards of government required environmental and health agencies. So why are we still talking about it? Please do not make a decision about the future of our schools based solely on the fear of litigation. While the Edna/Horse Hill/Scott Valley/West America community has tried to remain positive in moving forward, I promise you, it is not without its own faction of prominent lawyers that would be mobilized if this less superior site plan comes to fruition.

Whatever decision you make, I know you do not make it lightly, I just hope you consider everyone's concerns, not just the loudest minority. Let's just get this project going. We've wasted far too much time and money giving airtime to a noisy minority.

Thank you,

Christy Atkisson

Edna Parent, West America TKD patron, and Mill Valley Taxpayer

Responses to Christie Atkisson Comments

Please see Master Responses 1-4. Cultural Resources issues associated with the Lomita site are addressed in the Chapter 5 of the EIR, with additional information added in this document.

264. Liz Moriarty Comments

From: **Liz Moriarty** <lizmoriartymv@gmail.com>
Date: Wed, Oct 15, 2025 at 1:08 PM
Subject: Vote for Alternative 1
To: <jarroyo@mvschools.org>, Elizabeth Kaufman <ekaufman@mvschools.org>, <letterstotheboardoftrustees@mvschools.org>

Hi all,

Keri Brenner approached me as I walked out of the last board meeting and asked me "what I thought about the MVMS project?" After listening to all the other comments that night, I gave her an unfiltered version of my opinion. Except for leaving out my opening comments on the MVMS Mess group and the shameful role they have played in this, she adequately captured my complete frustration about where we are. That said, and with a few weeks to calm down, I am writing today to make clear my "vote" for pursuing the plan to renovate MVMS in its current site.

I wish we were still pursuing a full rebuild as initially conceived and has been discussed for years, but it appears renovation is our best option now. I think the proposal to place MVMS on the Lomita site is a terrible idea – the site is too small, the neighborhood is only served by small roads, has already endured a multiyear construction project, and we would be abandoning an excellent central location where MVMS now sits. The only worse proposal is what the MVMS Mess crew is proposing about displacing all students at Edna – the largest elementary in the district – moving them all over town and then building additional space at Edna and turning that into the middle school.

I also tend to think that keeping the kids at MVMS in portables seems the most sensible – 6-8th students & teachers all in the same place – but I could see a scenario where the portables for some or all of the middle school would be better placed on Lomita, Friends Field (is that even a possibility at this point?). Or if there is classroom space for 6th at Edna, maybe we save some on portables? I don't know the logistics around all of those options although they seem complicated and to outweigh any benefits or savings over 6-8 staying in portables at the MVMS site.

Most important to me, however, is that you do everything you can to keep this project moving forward. I have been reviewing the EIR and earlier board documents about the process and various reports, and I continue to have complete confidence in the safety of the site. I think the vast majority of parents agree with me. They are just too exhausted by this process to stay engaged. I am equally confident that there is absolutely nothing that you can do to satisfy the MVMS Mess crew. Please stop trying. You, as elected

officials and school district leaders, have a duty to act in the best interests of the students of Mill Valley, not this small group. The best interests of MV students – and taxpayers – is fulfilling the community's clear mandate for an upgraded middle school as soon as possible.

Thank you,

Liz

Liz Moriarty

Response to Liz Moriarty Comments

Please see Master Response 1.

265. Ron Soo Hoo Comments

From: **Ron Soo Hoo** <ronsoohoo@yahoo.com>
Date: Wed, Oct 15, 2025 at 1:44 PM
Subject: MVMS Rebuild Feedback on Alternatives (Measure G)
To: jarroyo@mvschools.org <jarroyo@mvschools.org>

I strongly urge the Board to select Alternative 1: Renovation of the Existing MVMS Campus (Sycamore Drive) for the Mill Valley Middle School Modernization Project. Alternative 1 is the most feasible and prudent choice for achieving Measure G objectives while allowing the project to begin immediately.

Alternative 1 is the environmentally sound, financially responsible, and educationally superior alternative.We urge the Board to uphold Measure G commitment and vote decisively in December 2025 to certify the Final EIR and approve Alternative 1 for Renovation of the Existing MVMS Campus, ensuring this crucial project begins no later than June 2026. Mill Valley cannot afford any more delays- the District loses approximately $8 million for every year that the Project is delayed. Our Children cannot wait- they deserve the modern, safe, climate-resilient campus the Alternative 1 will provide, not more years of additional studies, debates, and legal challenges the Alternative 2 would inevitably trigger. We don't need endless second-guessing by those who would rather restart than rebuild.

Regards. Ron Soo Hoo.

Response to Ron Soo Hoo Comments

Please see Master Response 1.

266. Anne Gates Comments

Dear Mr. Arroyo:

I have been a resident at 75 Lomita Drive since 1997. Our driveway is directly across from the school entrance driveway to Edna Maguire School.

I am also a licensed professional engineer in the State of California and have over 35 years of experience working on site redevelopment projects (especially contaminated property) in the Bay Area.

I have worked on redevelopment and remediation of school sites and have implemented similar mitigation measures as proposed for Mill Valley Middle School (MVMS) over the course of my career. As confirmed by the California Department of Toxic Substances Control (DTSC), the perceived health risks at MVMS are insignificant assuming the appropriate engineering controls and mitigation measures are properly designed and implemented. In my experience, DTSC is a very conservative agency with strict standards with regards to the protection of human health and the environment.

For this reason, I wholly support the modernization of the Middle School at its existing location.

However, as discussed in more detail below, **I DO NOT SUPPORT Alternatives 2 through 4, which involve the use of Edna Maguire School**.

During the Measure G campaign, THERE WAS NO MENTION OF ALTERNATIVE MIDDLE SCHOOL SITE LOCATIONS. If other sites or locations had been proposed as part of Measure G, voters (such as in my household) MIGHT NOT HAVE SUPPORTED Measure G. Although I am not an Edna Maguire parent anymore, I wonder if the voters who have children at Edna Maguire would have supported Measure G if they knew of the School District's alternative plans.

Alternatives 2 through 4 would significantly impact the elementary school students at Edna Maguire. For the School District to now USE TAXPAYER MONEY for building a Middle School at an alternative location (i.e., Edna Maguire) that was not discussed or mentioned in the Measure G campaign is disingenuous (and possibly illegal).

Furthermore, our small neighborhood already shouldered the large burden of prior construction activities at Edna Maguire with accompanying dust, noise, and traffic. We experienced and continue to experience significant impacts from traffic as a result of the increase in size of Edna Maguire and it is unbearable to think that the School District is

contemplating significantly impacting our neighborhood yet again with more construction and traffic impacts.

My comments on the Draft EIR are as follows:

SAFETY CONCERN 1: PROXIMITY TO HIGH PRESSURE PG&E PIPELINE

In discussing school safety for Alternatives 2 through 4, the Draft EIR does not mention the risk of the high-pressure gas pipeline that currently crosses the Edna campus. See Attachment 1, which shows the PG&E high-pressure transmission gas pipeline location on the Edna Campus.

As seen in the photos, the high-pressure gas line is less than 30 feet from a school building. California regulations require school sites to be located away from hazardous pipelines, including high-pressure gasoline lines, with a 1,500-foot setback from pipeline easements unless a risk analysis proves otherwise. (Title 5 of the California Code of Regulations 14010(h)). Currently, the 400+ students at Edna are in close proximity to this transmission pipeline and under Alternatives 2-4, the School District would put an additional 800+ students at risk.

The Draft EIR is Incomplete and does not Include an evaluation of the risks associated with this pipeline were an additional 800 to 1200 students located adjacent to this pipeline.

SAFETY CONCERN 2: EMERGENCY ACCESS

Under current conditions during morning and afternoon drop-off and pickup, Lomita Drive is gridlocked with school traffic on most days for 15 to 30 minutes. During this period, if a medical, fire or police emergency were to occur in close proximity to the school, emergency access by police, fire or ambulance would be extremely difficult due to the narrow width of Lomita Dr. and gridlock traffic conditions. Adding an additional 800+ students and extending the drop-off period under Alternatives 2-4, would only restrict emergency access further and lengthen the time period of restricted access.

In fact, during the previous Edna construction, an elderly neighbor went into respiratory distress (from too much dust from construction). The ambulance could not reach her home on Lomita due to traffic and the paramedics had to access her on foot.

Additionally, the traffic lights at E. Blithedale (Camino Alto and Lomita) allow only a certain number of cars through these intersections which causes traffic to back up along

E.Blithedale and Camino Alto. This ultimately restricts emergency access to other neighborhoods.

Although the Draft EIR mentions that shuttle buses from other schools will be used to access Lomita, it does not mention that portions of Lomita Dr are not wide enough for two shuttle buses to pass each other.

Furthermore, the Draft EIR states: "…It should be noted that the Marin County Department of Public Works is currently proposing a Renovation program for Lomita Drive that includes sidewalk extensions and other roadway improvements that would improve this situation…"

This is a misleading statement. The neighbors have been meeting with the County because our neighborhood is subject to significant flooding during large rain events. The County is currently planning to improve drainage in the portion of Lomita Dr that runs East-West. Replacement/repair of existing sidewalks and paving are planned under this project.

HOWEVER, no improvements are proposed for the heavily- travelled, narrow, sloping sidewalk that is on the North-South Lomita Dr. portion, as this sidewalk is under the City of Mill Valley jurisdiction.

The Draft EIR is incomplete and does not include an evaluation of the risks related to restricted emergency access were Alternatives 2-4 implemented.

SAFETY CONCERN 3: EMERGENCY EVACUATION

The Draft EIR states that "…Wildfire hazards at the Edna Maguire Elementary School site would be low, similar to those that would result from the proposed Project…" However, the Draft EIR does not discuss how over a thousand students AS WELL AS NEIGHBORS could be evacuated from the Edna Maguire campus from the small residential loop that serves the school and neighborhood. Edna Maguire is immediately adjacent to large open space and if a fire were to start in this open space, evacuation routes are limited. In contrast, the current MVMS location is located adjacent to the Bay and major arterial roadways which provide more alternatives for fire evacuation.

The Draft EIR is insufficient in its evaluation of evacuation risks during wildfire, disaster or "school shooter" events as it pertains to Alternatives 2 through 4.

HAZARDOUS MATERIALS RISKS

No information is provided as to whether testing of soil in the proposed construction areas under Alternatives 2-4 has been performed. It has been my experience that old structures (such as the Terra Marin School) have lead-based paint that has been deposited into adjacent soil as well as residual pesticides (such as arsenic, DDT and dieldrin) is soil from historical treatment for termites, weeds and other pests. In addition, asbestos and mercury are naturally present in soil and rock in Marin County and can potentially cause adverse risks when present in dust at high concentrations.

The Draft EIR is incomplete with regards to evaluation of hazardous materials risks under Alternatives 2-4.

ALTERNATIVES 2-4 DO NOT ADDRESS IMPACTS OR PROVIDE MITIGATION TO RESIDENTS WITH REGARDS TO DUST

The Draft EIR has not adequately addressed the impacts from dust to RESIDENTS with regards to Alternatives 2-4. Although the Draft EIR has provided mitigation for STUDENTS AND TEACHERS to these impacts, there is no discussion of the impacts on residents that are in CLOSE proximity to the Edna Maguire/Terra Marin Campus.

For example, Mitigation Measure 3.2-8 requires installation of an Air Filtration System for both the interim and permanent campuses. These features shall be submitted and be included on the project drawings submitted for the construction permit. But, what about air filtration systems for nearby RESIDENTS?

Residents are potentially exposed to dust for a longer duration (summer months, outside of school operating hours, etc). As an example, when Edna Maguire was being re-built, residents that were immediately adjacent to the school (like my family) had significant dust on their cars, yards and inside their homes (even with windows shut). In the warmer months, windows could not be opened because of the dust. Residents (adults and children) with asthma and other respiratory diseases could not be outside during earthmoving operations and many suffered adverse effects. As mentioned above, an elderly neighbor was walking and went into respiratory distress as a result of particulate emissions during onsite grinding of concrete. She never recovered from this exposure and ultimately passed away.

Mitigation measures, especially with regards to dust for RESIDENTS (not just school occupants), need to be included in the Draft EIR for Alternatives 2 through 4).

ALTERNATIVES 2-4 DO NOT ADDRESS NOISE IMPACTS

The Draft EIR has not adequately addressed the impacts from noise to RESIDENTS with regards to Alternatives 2-4. Although the Draft EIR has provided mitigation for STUDENTS AND TEACHERS to these impacts, there is no discussion of the impacts on residents that are in CLOSE proximity to the Edna Maguire/Terra Marin Campus.

During the previous construction of Edna Maguire, large construction equipment was dropped on Lomita Drive between 4 and 6 am on a regular basis. The equipment was dropped off during these hours because traffic congestion and narrow streets prohibited the transportation of large equipment during regular business hours. As a result, there was a significant amount of noise (beeping equipment, truck engine idling, etc.) that woke up neighbors, often repeatedly between 4 and 6 am. We contacted the School District and General Contractor to stop this practice, but it did not stop. We ended up having to repeatedly call the police. This is a big issue for residents and the Draft EIR for Alternatives 2-4 needs to address this impact and develop a mitigation measure.

ALTERNATIVE 4 DOES NOT ADDRESS IMPACTS TO AESTHETICS

The Draft EIR does not address the impacts to aesthetics under Alternative 4 (Dual Campus). Because of the reduced campus size, the new MVMS would require buildings of multiple stories likely in close proximity to surrounding residences and likely not in compliance with current zoning building height limits.

CLOSING

It is unclear from the Draft EIR if Alternatives 3 and 4 are implemented, what happens to the MVMS building at the existing campus. There are state regulations governing use of school property that is no longer needed. In my professional work experience, I have seen surplus school property be used for Charter Schools, leased to other entities that provide public benefit or returned to the State at which point the State can use the property for whatever purpose needed. As a taxpayer, I think it is important to know what the large MVMS building and accompanying land will be used for and how re-use of that property will benefit the property taxpayers of Mill Valley if not used for a public school.

As discussed above, I DO NOT SUPPORT Alternatives 2 through 4, which involve the use of Edna Maguire School. Our small neighborhood already shouldered the large burden of prior construction activities at Edna Maguire with accompanying dust, noise, and traffic. We experienced and continue to experience significant impacts from traffic as a result of the increase in size of Edna Maguire and it is unbearable to think that the

School District is contemplating significantly impacting our neighborhood yet again with more construction and traffic impacts.

The current MVMS has effectively operated at its current location for over 40 years. It is located in close proximity to the Community Center, sports fields, tutoring locations, the high school, etc. which allows middle school-age children to easily walk or bike to after school activities. Why the School District would contemplate moving it to a much smaller campus in a much less convenient location is nonsensical.

Kind regards,

Anne W. Gates, P.E.

Responses to Anne Gates Comments

The comments include numerous requests for additional information on alternatives involving the Lomita Drive site. CEQA does not require the same level of analyses for alternatives as it does for the proposed Project, but rather sufficient information to allow a meaningful evaluation and comparison of impacts with the proposed project. (CEQA Guidelines Section 15126.6(d)).

Specific Comments are addressed below, corresponding to the numbers in the letter.

A. **High-Pressure Pipeline.** The existence of the high-pressure pipeline is acknowledged. If an alternative involving development on the Lomita site were to be approved, the District would coordinate with PG&E to assure that impacts associated with that pipeline are avoided in both construction and operation of the school. Please note that the pipeline is an existing condition, and not a Project impacts.

B. **Emergency Access.** Please see Master Response 3.

C. **Emergency Evacuation.** Please see Master response 3.

D. **Hazardous Materials.** Should the Lomia site be selected, all applicable mitigation measures included in the DEIR for the proposed Project would apply to the alternative. These include lead-based paint and asbestos-containing materials mitigations.

E. **Dust Impacts.** Should the Lomia site be selected, all applicable mitigation measures included in the DEIR for the proposed Project would apply to the alternative. These include air quality and dust mitigations and other measures required by the

BAAQMD. As with the MVMS Replacement Campus Project, **Mitigation Measure 3.2-1 through 3.2-8** would also be required to reduce fugitive dust and combustion emission impacts for the Edna Maguire Alternatives. These mitigation measures would likely reduce air quality impacts for students/staff at the existing elementary school and nearby residence to **less than significant**. Although the air quality impacts at nearby residence associated with Edna Maguire Alternatives may be higher than the air quality impacts at nearby residence associated with the MVMS Replacement Campus Project, it would be expected to be **less than significant with mitigation measures.**

F. **Noise Impacts**. Construction would conform with the City of Mill Valley's Noise Ordinance and General Plan stipulations regarding noise. Applicable noise mitigation measures from the proposed Project also would apply to the referenced alternatives. Temporary construction noise impacts from the Edna Maguire Alternatives would likely result in a **significant and unavoidable impact** to students and staff at the Edna Maguire campus (similar to the MVMS Replacement Campus Project).

Temporary construction noise impacts from the Edna Maguire Alternatives would likely result in a **significant and unavoidable impact** to nearby noise-sensitive receptors (compared to a **less than significant impact** for the MVMS Replacement Campus Project). This is because the noise-sensitive receptors along Lomita Drive would be much closer to the construction activities occurring at the Edna Maguire campus compared to the noise-sensitive receptors nearby the MVMS Replacement Campus Project.

For the two previous noise impacts, **Mitigation Measures 3.9-1, 3.9-3, and 3.9-4** would be applicable to construction activities for the Edna Maguire Alternatives. However, any type of construction noise barrier (as detailed in **Mitigation Measure 3.9-2**) would not be feasible due to potential circulation and vehicle access issues at the Edna Maguire campus.

The increase in traffic noise levels at noise-sensitive receptors nearby the Edna Maguire campus would likely result in a **significant and unavoidable impact** to nearby noise-sensitive receptors (compared to a **less than significant impact** for the MVMS Replacement Campus Project). This is because Lomita Drive (a two-lane road) would be the main road used to access the school and the Edna Maguire Alternatives would likely result in a significant increase in vehicle trips on this roadway. In addition, noise-sensitive receptors along Lomita Drive would be closer to traffic noise compared to the noise-sensitive receptors nearby the MVMS

Replacement Campus Project access roadways. There would be no feasible mitigation measures to reduce traffic noise level increases for the Edna Maguire Alternatives.

Thus, the Edna Maguire Alternatives would likely result in greater construction noise and traffic noise impacts compared to the MVMS Replacement Campus Project.

G. **Aesthetics**. The comment's concerns regarding aesthetics are noted. Any school construction on the Lomita Drive site would have aesthetics similar to the existing school and portables, which would not result in a potentially significant impact to visual quality.

The comment's preferences with respect to alternatives are noted. Please see Master Response 1.

267. Richard Ross Comments

Elizabeth and Julio,

Please see the attached letter below from our neighborhood HOA. Our family supports all of the comments expressed in the attached letter.

It is patently obvious that MVMS should be renovated rather than build what would be an inadequate facility next to Edna MaGuire. Not only is the Edna adjacent **site** unsuitable, the cul de sac **location**would create ridiculous traffic congestion in that neighborhood and throughout Mill Valley. The current MVMS gravity is well located and if renovations are thoughtfully implemented the school could be a wonderful community asset for years to come.

Sincerely,

Richard Ross

15 Lois Ct, Mill Valley, CA 94941

Attachment: Scott Valley Homeowners Association Letter

Responses to Richard Ross Comments

Please see Master Response 1. The Scott Valley Homeowners Association letter is responded to in responses to comment # 192, above.

268. Allie Jant Letter

From: **Allie Jant** <palliejant@gmail.com>
Date: Thu, Oct 16, 2025 at 11:58 AM
Subject: Draft EIR comment
To: <ekaufman@mvschools.org>, <jarroyo@mvschools.org>
Cc: <cboc@mvschools.org>

Hello,

Thank you for accepting public comments regarding the modernization of the Mill Valley Middle school. I don't currently have a child in middle school, but I will have 3 in the future.

Keeping the middle school on the same site concerns me due the results of the environmental analysis. There are multiple contaminants identified and methane found at explosive ranges in parts of the campus. It is in a high liquefaction zone and I am concerned what would happen during an earthquake. The USGS said there is a 72% chance of an earthquake 6.7 or greater magnitude hitting before 2043. What would happen if the ground turned into liquid? Could we realistically say this campus was foolproof and safe? If the older foundation was left in place due to budget constraints, it could expose the entire structure to damage. Worse, methane gas could be unearthed and dispersed even if the structure held up. This gas that was already found at explosive levels could be ignited due to seismic activity, creating an explosion. It scares me to consider this as an option because I am scared of losing kids in a tragedy that could have been prevented.

I am sure if that option was selected we would construct to the best possible standard given budget constraints, but would it truly be enough? And if the site has all of these limitations, the question I'm trying to answer is why? Why expose our kids to these possible risks? I hear there is concern about traffic congestion in Edna. I can understand it would be hard to pivot and consider alternatives such as moving MVMS to Edna and redistributing students to other elementaries, but if this makes it that bit safer – why aren't we putting our kids safety at the forefront?

We weren't aware of the multiple contaminants and methane vapors at an explosive range when the modernization plan was first proposed onsite. Now that have that information, we have a responsibility to pick a site for a long term investment valuing our children's safety and wellbeing. The fact is there could be an explosion, and we are exposing our kids to danger and chemicals when it could have been completely prevented by moving to an area that is not contaminated. Why do we want to take on this risk?

Is it because with the alternative, people would be inconvenienced by the change in their neighborhood? Are those concerns really at the same level? If congestion/egress

in the neighborhood is the greatest fear with the alternative option, I would propose moving MVMS to Edna and building classrooms at the other elementaries to accommodate the current students so that the amount of students incoming would stay around the upper limit of what Edna was built for. This presumably would keep it safe without too much congestion or issues with egress since it was approved for a similar amount of students that are in MVMS already (within 20). The campus size is almost equivalent and it should be a quicker timeline to bring the current middle school students to a safer environment by simply modifying the current campus for middle school needs. For the elementary students, I would propose redistributing them to other elementaries (we have 4 other locations) and building new classrooms there with the budget. If this is not possible, then considering repurposing Terra Marin for a smaller elementary while redistributing is also great option since it was operating as a school in the previous years without having a negative impact on the community.

This option to me seems the safest for a long term investment where safety of children is being kept at the forefront. It should be much more cost effective since costs could easily balloon at the current MVMS site due to remediation efforts for site conditions and would also potentially have a quicker timeline without having to wait for future environmental analysis. All in all, it seems like the obvious choice for a sound long term investment.

People's concerns about their neighborhood are valid, but not more important than our children's long term safety. I don't want to be the community that supports placing children on top of a contaminated and unstable site that is inherently more risky when we can sit down and figure out a way to handle neighborhood concerns.

I have spoken with several parents from the Edna neighborhood and want to point out that there is a false narrative that the modernization project is being delayed by parents wanting to move MVMS to a safer site and halting the project, when in reality there is still environmental analysis that needs to be completed before the project can continue on the current MVMS site. The parents that are spreading this narrative have been getting much of the community involvement in their mission to push forward at the current MVMS site positioning it as being the option to "move forward" with modernization. A large amount of signatures represent not support for the site but rather the public that wants to move forward with modernization since money is being wasted and children need a safe school already.

It would be great If an analysis could be done to compare cost and timeline between all the alternatives for the public to have factual information to look at as opposed to using circulated narratives for what to support and not support. Additionally when considering the current MVMS site, it's extremely important to wait until the environmental analysis has been completed because, in reality, we have no idea what it would take to continue at the current MVMS site (and if it truly is an option) before that is completed. A premature hasty decision to go this way would really tie our hands.

I hope we can ensure we don't give into the narrative to "unblock" the modernization with a decision now. Until we have all the facts at hand, we don't know what we are working with and public opinions are swayed by emotional campaigns about "stop delaying" and "I can't imagine the impact on my neighborhood" as opposed what is really at stake.

Where it currently stands, I strongly favor the alternative of using Edna as a middle school and redistributing students because it seems like it would be a wiser long term investment on all fronts: cost, timeline, long term sustainability and above all, our children's safety.

I appreciate you hearing my opinion.

Thank you,

Allie

ATTACHMENT 1 – HIGH PRESSURE GAS MAIN INFORMATION

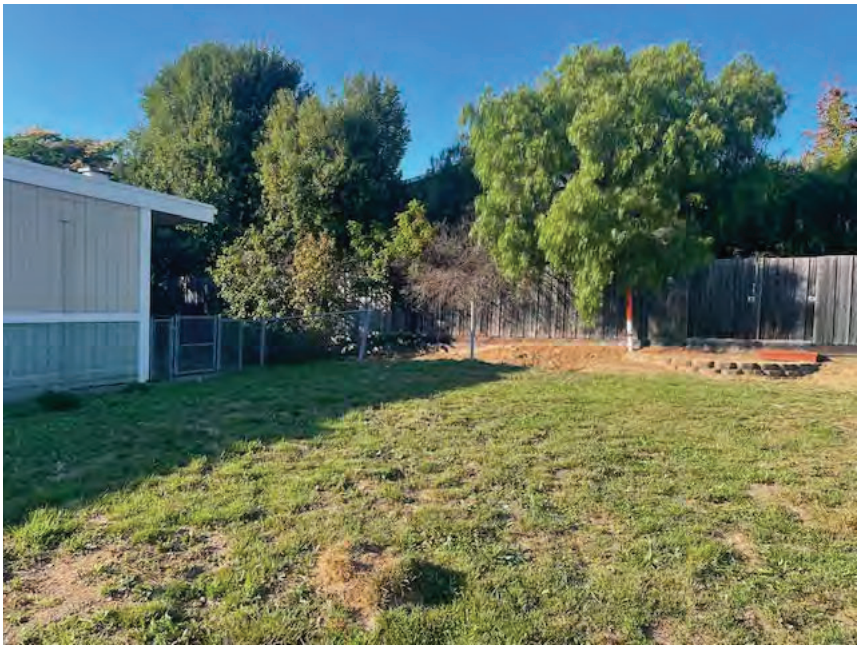
Pipelines can be located anywhere, including under pavement, sidewalks, fields and on private property. This map shows the general locations of PG&E owned or operated Gas Transmission Pipelines (greater than 60 pounds per square inch). Not shown are low pressure gas distribution mains (less than 60 pounds per square inch) and small diameter service lines connecting gas meters to homes and businesses.

To locate Gas Transmission or Hazardous Liquid Pipelines operated by other companies, please visit the U.S. Department of Transportation's website: **Pipeline and Hazardous Materials Safety Administration website. Opens in a new window.**.

Update Frequency: Quarterly
Source: PG&E GTGIS pipeline centerline data



ATTACHMENT 1 – HIGH PRESSURE GAS MAIN INFORMATION





Responses to Alli Jant Comments

The comment's concerns regarding seismic hazards are noted. The Renovation Alternative would not increase any such hazards compared with the existing conditions, which form the CEQA baseline for analyses (see CEQA Guidelines Section 15125(a)(1)). It is noted that a new school could improve the structure compared to the existing school.

Site contamination hazards associated with the existing school under the Renovation Alternative would be reduced to less-than-significant levels by installation of a sub-building depressurization system, which would draw contaminated soil vapor away from the building interior, as part of that alternative.

The comment's concerns regarding other comments' characterizations of issues at the Lomita Drive alternatives site are noted.

Cost and timeline issues are not in themselves CEQA impacts.

Please see Master Response 1 with respect to project/alternative preferences.

269. Hayley Nelson Comments

From: **Hayley nelson** <hayley.nelson@gmail.com>
Date: Thu, Oct 16, 2025 at 5:05 PM
Subject: Draft EIR Comment
To: jarroyo@mvschools.org <jarroyo@mvschools.org>, <ekaufman@mvschools.org>
Cc: <cboc@mvschools.org>, <ptacouncil@mvschools.org>

To whom it is concerned:
I agree with the concerns in the MVMS Modernization Mess public comment letter, and I'd like the District to meaningfully address the requests in that letter.

Declining enrollment numbers do not support the 2021 Master Plan analysis that eliminates the consideration of the Edna Magure site for a middle school. I support exploring the Edna Maguire site as a safer and more cost-effective alternative.

As a Mill Valley parent, I'm concerned about the health and safety of students and teachers given the current site's documented contamination. I urge you to complete the soil tests and mitigation plans before finalizing a decision.

Thanks for your consideration,
Hayley Nelson

--
Hayley Nelson Consulting

Responses to Hayley Nelson Comments

Please see the Response to Mill Valley Modernization Mess Comments (Comment 187) for a discussion regarding existing soil conditions, hazards, and the enrollment data used for purposes of the EIR's analysis.

270. Michael McSunas Comments

From: **Michael McSunas** <mcsunasm@gmail.com>
Date: Thu, Oct 16, 2025 at 5:54 PM
Subject: Keep West America TKD in Its Home, Please
To: <jarroyo@mvschools.org>

Dear Mill Valley School District Board,

I strongly urge you not to displace West America TKD & After Care from its Lomita Dr. location. For 42 years, this dojo has been more than a building—it's been a safe, supportive community where children and families learn discipline, confidence, and respect.

My two children and I all currently train there and, as a Tae Kwon Do instructor myself, I can say it's a truly unique and wonderful place. A dojo is like a tree planted from a seed. With time and care it grows into something wise and strong. Moving West American TKD after 42 years of cultivation for a temporary renovation need would be very shortsighted. Please don't do it.

Losing this space would disrupt a legacy that has shaped generations. Please find a solution that allows the middle school renovation to move forward without forcing West America from the home it has built with this community.

Thank you for your consideration.
Sincerely,
Michael McSunas

Response to Michael McSunas Comments

Please see Master Response 2.

271. Mario and Christina Barrios Comments

From: **Mario k Barrios** <mjbarrios1@icloud.com>
Date: Thu, Oct 16, 2025 at 3:45 PM
Subject: Construction/ remodeling of mill valley middle school
To: <jarroyo@mvschools.org>

Please be advised that we support the remodeling /construction of the MV Middle School at its present location. Thank you in advance for your support of this position…..

Mario and Cristina D. Barrios
53 Shell RD
Mill Valley, CA. 94941

Response to Mario and Christina Barrios Comments

Please see Master Response 1.

272. David and Erin Griffis Comments

From: **David Griffis** <davidgriffis1@gmail.com>
Date: Thu, Oct 16, 2025 at 2:14 PM
Subject: MVMS Modernization
To: <jarroyo@mvschools.org>
Cc: Erin K. Griffis <erinkgriffis@gmail.com>

Dear Ms. Arroyo and MVSD Board,

I am writing to strongly urge you to select Option 1 (renovate the existing MVMS campus) for the MVMS Modernization project. It is surprising that Option 2 (building a new school next to Edna Maguire) is even under consideration given the dramatic negative impact this would have on the immediate neighborhood as well as the citywide consequences of the resulting traffic pattern.

Option one is clearly the only feasible option, for many reasons, but primarily location and traffic. Relocating from the current central location to an outer corner of town will have a negative impact on traffic citywide.

The current location of MVMS is ideal because it is central, with multiple routes providing access from all areas of Mill Valley. This allows traffic to and from the school to be dispersed between 6 main corridors:
1. Miller Ave from the north – Homestead Valley, Cascade Canyon, and downtown.
2. Miller Ave from the south – Tam Valley and Almonte.
3. Sycamore Ave. – Sycamore Park.
4. E. Blithedale Ave. from the west – Blithedale Canyon, Boyle Park, and Country Club.
5. E. Blithedale Ave. from the east – Alto Sutton-Manor and Strawberry.
6. Camino Alto – Scott Valley.

In addition to the increased cross-town traffic this would cause, imagine all the MVMS bound traffic from arteries 1 – 4 all trying to make a left hand turn onto Lomita Drive from E. Blithedale at the same time. It is hard to imagine this wouldn't completely overwhelm this intersection and render the entire (already impacted) E. Blithedale corridor from Camino Alto to 101 non-functional.

Additionally, as others have noted, the streets within the Edna neighborhood are narrow and of sub-standard quality, they simply can't handle the incremental volume of an additional 750 commuters twice per day.

Both of our children attended Edna Maguire during the re-build of that campus as well as MVMS in its current location. They both had excellent experiences throughout, received great educations and are healthy and thriving young adults. My point is, I understand the anxiety of current parents, but I believe their fears associated with the

remodel of the existing site are misplaced.

Thank you for your consideration and for your dedication to our excellent local public schools.

Sincerely,
David and Erin Griffis

Responses to David and Erin Griffis Comments

Please see Master Response 1 regarding preferences among the Project and alternatives.

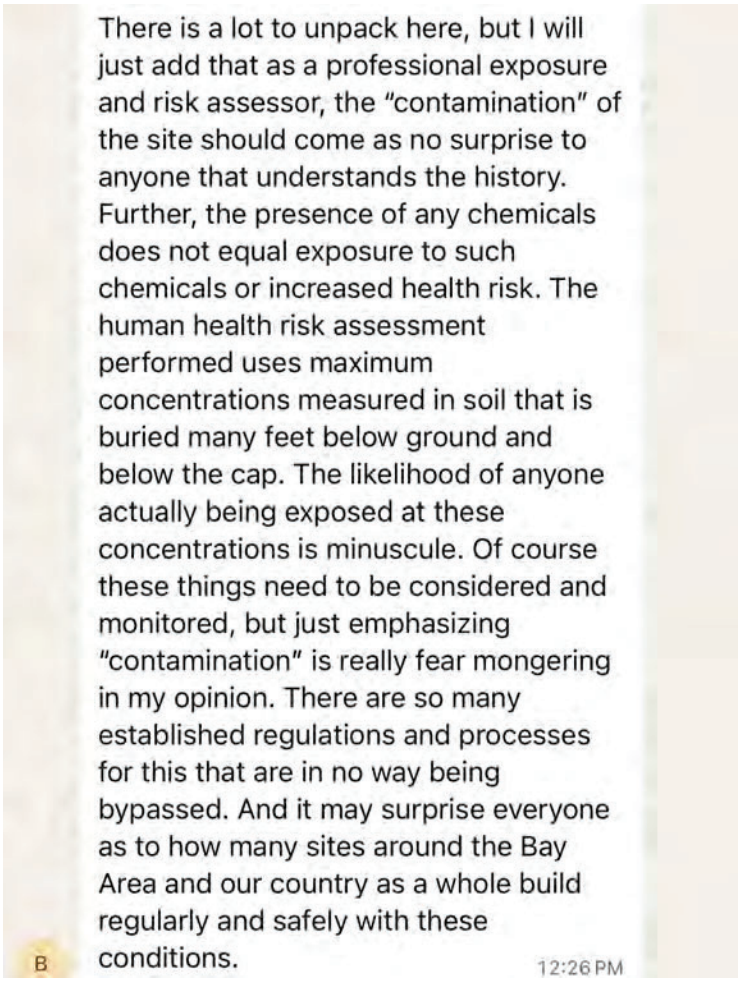
Traffic congestion comments are noted. Traffic congestion is no longer a CEQA potentially significant impact. Please see Master Response 3 regarding emergency access to the Lomita Drive site.

273. Bruce Bottsford Comments

From: **Bruce Botsford** <brucebotsford@gmail.com>
Date: Thu, Oct 16, 2025 at 2:02 PM
Subject: Fwd: MVMS Modernization EIR Comments
To: <jarroyo@mvschools.org>

THE MOST RATIONAL, SAFE, AND RESPONSIBLE OPTION IS RENOVATING THE EXISTING MIDDLE SCHOOL WITH TEMPORARY 6th-8th GRADE HOUSING IN PORTABLES ON SITE.

Confidence in the Safety of Renovations and Temporary Housing On Site: We are confident that the results of the EIR clearly demonstrate that renovating the existing middle school and placing temporary student housing in portables on site is SAFE. We are confident that the state's highly-regulated building requirements for schools would ensure that appropriate steps are taken to mitigate any potential hazards during construction. Furthermore, an expert in this space from our own community had the following to say:



Disruption of Edna Maguire Community

Traffic Concerns: Building a new middle school at 70 Lomita OR building temporary student housing at this site would cause Lomita Drive and the surrounding neighborhoods to be flooded with excessive traffic. This would place a significant traffic burden on the Alto-Sutton neighborhood, parts of Scott Valley, and surrounding community. As a parent of a former Edna student, the idea of managing the major increase in traffic along with the disruptions to traffic caused during the actual construction period is unfathomable. I cannot imagine the pain imposed on our friends in the adjacent community from the additional traffic volumes imposed by any solution involving usage of 70 Lomita drive.

Parking Concerns: The proposed use of 70 Lomita—whether for a new middle school or temporary housing—would significantly increase parking demand at a site that already lacks sufficient capacity. The combined Edna/Lomita campus population would grow from about 500 to 1,350 students and staff (a 2.5x increase), yet the plans call for removal of the existing Edna drop-off loop and 43 adjacent parking spaces, with no replacement parking included.

Insufficient Space/Acreage: The current middle school sits on a ~14 acre site. The 70 Lomita site is ~4 acres. The 70 Lomita site is simply not enough space to house a new middle school. Renovating the existing
school leverages the largest acreage available, and is the most appropriate site for a middle school design (site adequacy per CDE guidelines).

Additional Concerns

Native American Archaeological Site at Edna Maguire: During the school's previous renovation, cultural remains of the Coast Miwok tribe were discovered, and a 2025 study confirmed the archaeological significance of this site. Beginning new construction near Edna risks further discoveries that could halt the project and cause significant delays.

Shared playing fields and Multipurpose Room/Gymnasium: A new middle school or temporary housing at 70 Lomita school would result in requiring elementary and middle school students to share playing field space at Alto Field and gymnasium space. Developmentally, it is best for these different age groups to have their own separate play spaces.

Keep Middle Schoolers Together: We strongly feel that keeping 6th-8th graders in one location is crucial. Temporary housing of any subset of middle schoolers at 70 Lomita or the Edna campus would be unfavorable. We want to keep the middle school students together as they build community and culture together in anticipation

of joining high school together. We do not want to divide the middle school teachers, counselors and administrators between different temporary school sites.

New HVAC System To Mitigate Sewer Plant Smell: The nearby Sewage Treatment plant has already implemented practices to minimize unsavory smells at the middle school. A renovation of the existing building on Sycamore Ave would allow for new HVAC systems to be installed that would further mitigate this concern.

Responses to Bruce Bottsford Comments

Please see Master Response 1 regarding preferences among the Project and alternatives. Hazards associated with soil contamination are addressed in the Hazards and Hazardous materials and Air Quality chapters in the EIR.

Traffic and Parking Concerns. Traffic congestion and parking comments are noted. Traffic congestion and parking are no longer CEQA potentially significant impacts. Please see Master Response 3 regarding emergency access to the Lomita Drive site.

Native American Site. The Native American site at the Edna Maguire school is discussed in Chapter 5 in the EIR. Mitigation Measure 5.2-1 is modified in this document to incorporate input from the Federated Tribes of Graton Rancheria.

Shared Playing Fields. The comment regarding shared fields is noted. This is not a CEQA environmental issue.

Keep Middle Schoolers Together. The comment keeping middle schoolers together is noted. This is not a CEQA environmental issue.

New HVAC System to Mitigate Sewage Smell. This comment is noted. Both the proposed Project and the Renovation Alternative, as well as the interim Campus modular buildings, would have upgraded HVAC systems to minimize sewage smell.

274. West America After Care Comments

From: **West America After Care** <westamericaaftercare@gmail.com>
Date: Thu, Oct 16, 2025 at 7:06 PM
Subject: EIR Public Comment
To: Julio Arroyo <jarroyo@mvschools.org>

Hi Julio,

This is my comment on the EIR in opposition to moving the middle school students to Edna.

I have been part of the TKD community and attending their classes for over 25 years. TKD and After Care are such vital pillars in the community. We provide a safe and nurturing environment where students can learn, grow, and thrive. We teach respect and manners, perseverance, patience, kindness, and communication.

Having the ability to pick students from their classrooms, walk them across to a safe, nurturing after school environment does not only give working parents a piece of mind, it is an indispensable or rather, essential service to the community as a whole where limited options exist close by for families.

Being located along with TKD next to the Edna campus is part of the culture we have created in the Edna- Lomita community, and which families depend on. We have a history here.

We do not just serve the Edna school community at that location but have accommodated students from every mill valley school district elementary school within the last decade of our operations.

As a local business, community member, and Kiddo sponsor, I want to express our opposition to the option of housing middle school students at the Edna- Lomita campus.

The school district has listed some cons about using Lomita (our location) as a campus for the middle school:
- Acreage doesn't meet CA. Dept. of Education guidelines
- Cannot handle projected enrollment increase
- Loss of centralized campus location
- Increased city-wide traffic congestion
- Impacts Edna Maguire community
- Displaces current tenants

In addition, we want to highlight further consequences on the community
- May impact the archaeologically sensitive Native American site at Lomita

- Loss of the Lomita soccer field
- Inadequate to accommodate exit in case of emergency or disaster for an increased student body and the surrounding community
- There are 544ateria 757 students enrolled at MVMS and 428 at Edna as of 2023-2024. Combining campuses would potentially bring the new total to be 1,185, an 176.9% increase, nearly tripling the student body at the Edna/Lomita location.
- The above numbers are student only and have not even approached considerations needed for staff.

Finally, as we now have the unofficial word that the MVMS campus will not require deep soil mixing to house portables on the campus, there is no reason to put the Edna-Lomita community at risk or deprive them of their childcare and enrichment commitments, or impact the sense of safety this community offers as it currently is.

Thank you.

--
Lara Zegart
Director
West America After Care
415-322-0296

Responses to America West After Care Comments

Please see Master Responses 1 and 2. The soccer field would not be lost with the project. Emergency access is addressed in Master Response 3. The Native American site at the Edna Maguire school is discussed in Chapter 5 in the EIR. Mitigation Measure 5.2-1 is modified in this document to incorporate input from the Federated Tribes of Graton Rancheria.

275. Susan Parrott Comments

From: **Susan Parrott** <susan.parrott128@gmail.com>
Date: Fri, Oct 17, 2025 at 8:52 AM
Subject: MVMS Modernization Project
To: <jarroyo@mvschools.org>

Dear Julio Arroyo,

I am writing in regard to the plans for moving the Mill Valley Middle School to the current Edna Maguire site.

I have lived in the Alto Sutton area for nearly 60 years. If this plan goes forward, the entire area will change and not for the better. Where will all the traffic go? What happens if there is an emergency? This plan will ruin my community, and destroy my current way of life.

Please take this plan off the table. As a local Mill Valley citizen, who has spent a majority of her life in the same house, I can't imagine how horrible life will be if it goes forward.

Thank you in advance for your time and help.

Sincerely,
Susan Parrott

Responses to Susan Parrott Comments

Please see Master Response 1.

276. James Beardon Comments

From: <jamesbeardon@proton.me>
Date: Fri, Oct 17, 2025 at 9:09 AM
Subject: Mill Valley Middle School Modernization Project Draft EIR
To: <jarroyo@mvschools.org>

Dear Superintendent Kaufman and Members of the Board,

As a concerned community member, I am writing to express serious concerns about the adequacy, accuracy, and timing of the Draft Environmental Impact Report (DEIR) for the Mill Valley Middle School Modernization Project. Based on a review of the DEIR and recent public statements, it appears that the document does not meet CEQA's fundamental standards for full disclosure, objective evaluation, and decision-making transparency.

1. Premature Determination Before Completion of the Public and DTSC Review Process
   At the October 16, 2025 School Board meeting, Superintendent Kaufman stated that the California Geological Survey (CGS) had contacted her and advised that deep-soil mixing would not be needed for the temporary campus at the current middle school site and said that would inform her recommendation. While that statement may have been intended to update the public, it also suggested that the District has already drawn conclusions about the preferred site and construction method prior to the close of the public comment period and before completion of the Department of Toxic Substances Control (DTSC) review.

CEQA requires that an agency refrain from making commitments or taking steps that would prejudge environmental outcomes or constrain feasible alternatives before environmental review is complete (Guidelines section 15004(b)(2)(B)). The Superintendent's remarks, coupled with the ongoing Draft EIR circulation, create the appearance of predetermination—a procedural flaw that can render the EIR legally vulnerable.

2. Unstable and Incomplete Project Description
   The DEIR's project description lacks a stable, internally consistent definition of what is actually being proposed. Over the last year, the District has alternated between a full reconstruction, a major modernization, and now a renovation with partial rebuild, yet the Draft EIR continues to refer to the project as a "modernization" without clear delineation of which structures are to remain or be replaced.

A project description that changes 547aterialy during environmental review fails to meet the standard of CEQA Guidelines section 15124, which requires a clear, stable, and finite description to allow meaningful environmental analysis. Without this, all downstream analysis—especially of air quality, hazards, traffic, and costs—becomes unreliable.

3. Premature CEQA Processing Before DTSC Concurrence
   The DEIR acknowledges that DTSC review of the Preliminary Endangerment Assessment (PEA) remains pending. Proceeding with EIR circulation and potential certification before DTSC issues formal concurrence undermines CEQA's requirement that all hazardous materials impacts be fully analyzed and mitigated prior to project approval.

This sequencing error exposes the District to claims of "piecemealing," or processing part of the project before essential environmental determinations are finalized. CEQA and DTSC joint guidance specifically discourage this approach for school projects on potentially contaminated sites.

4. Inadequate Analysis of Feasible Alternatives
   The DEIR's alternatives chapter provides only minimal discussion of potential alternative sites or configurations. In particular, the Edna Maguire Elementary site relocation is dismissed based on outdated 2021 enrollment data rather than current demographic or cost information.

CEQA requires that a reasonable range of alternatives be analyzed in meaningful detail to permit informed decision-making (section 15126.6). The current DEIR fails that test by excluding viable options that could reduce risk, cost, and environmental impact.

5. Outdated Technical Studies and Incomplete Hazard Integration
   Several technical appendices—including traffic, flood, and air quality analyses—use baseline data that predates the most recent soil and groundwater findings, floodplain updates, and DTSC comments. The Health Risk Assessment and hazard mitigation discussion appear to have been drafted prior to the release of later sampling data, creating a significant information gap that should trigger recirculation under section 15088.5(a).
6. Conclusion and Request
   For these reasons, I urge the District to suspend further processing of the DEIR, refrain from making any commitments or representations about preferred sites or construction methods, and recirculate a revised DEIR after DTSC concurrence and updated technical analyses are complete.

Doing so will not only ensure CEQA compliance but also rebuild community confidence that decisions are being made transparently, with environmental safety and fiscal prudence as top priorities.

Sincerely,
A Concerned Community Member
Mill Valley, California

Responses to James Beardon Comments

The comments are responded to below in the same numerical order as presented in the comment.

1. Premature Determination Before Completion of the Public and DTSC Review Process

The comment is noted. While staff may recommend one of the alternatives, the Board of Trustees has not predetermined which one, if any, will be approved. See Master Response 7 for a discussion of DTSC's review and the process regarding the preparation of the PEA.

2. Unstable and Incomplete Project Description

The Comment conflates the proposed Project with Project alternatives. The proposed Project is described in. the EIR's Project Description chapter, while potential alternatives to the Project are described in Chapter 5, Alternatives.

The Board of Trustees has the discretion to approve either the Project or an Alternative, or no project at all. Because of the possibility of the Board approving the Renovation Alternative (Alternative 5), the description of that alternative and its impacts has been expanded. This expanded Alternative 5 discussion is included in the Staff-Initiated Text Changes chapter of this document. See also Master Response 5 for a generalized discussion regarding the adequacy of the Project Description and Master Response 6 for a specific discussion regarding the adequacy of the description of Alternative 5.

3. Premature Processing Before DTSC Concurrence

See Master Response 7 for a discussion of DTSC's review and the process regarding the preparation of the PEA.

4. Inadequate Analysis of Feasible Alternatives

See Master Response 5 and Master Response 6 for a discussion regarding the adequacy of the description and analysis of the alternatives to the Project.

Under CEQA, an EIR must evaluate the comparative merits of the alternatives identified in an EIR. (CEQA Guidelines Section 15126.6.) The level of analysis of alternatives is subject to a rule of reason, as with the range of alternatives that must be discussed. (*Laurel Heights Improvement Assn. v. Regents of University of California* (1988) 47 Cal.3d 376, 406.) CEQA does not require that the discussion of alternatives be exhaustive. (*Sierra Club v. City of Orange* (2008) 163 Cal.App.4th 523, 548.)

In any event, as discussed in Master Response 6, the analysis of Alternative 5, Renovation, has been augmented with additional detail. Please see Staff-Initiated Text Changes chapter of this document for the updated discussion.

5. Outdated Technical Studies and Incomplete Hazards Integration

Updated health risk information has been included in the hazards/hazardous Materials and Air Quality chapters of the EIR. It is unclear from the comment what other studies are considered outdated, and in what ways.

The updated analysis further does not require recirculation of the Draft EIR. The standards for recirculation set forth in CEQA Guidelines Section 15088.5 require recirculation "when significant new information is added to the EIR after public notice is given of the availability of the draft EIR for public review." "Significant new information" requiring recirculation includes (1) where a new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented; (2) where a substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance; (3) where a feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the significant environmental impacts of

the project, but the project's proponents decline to adopt it; and (4) where the draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded. (CEQA Guidelines Section 15088.5(a).) None of these conditions are met here.

CEQA Guidelines Section 15088.5 further makes clear that "[r]ecirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR." Here, the updated analysis, which does not change the conclusions set forth in the Draft EIR and serves to merely clarify or amplify the initial analysis does not require recirculation, and the lead agency's decision to not recirculate is supported by substantial evidence in the administrative record. (CEQA Guidelines Section 15088.5(d).)

6. Conclusions and Request

As noted previously, see Master Response 7 for a discussion of DTSC's review and the process regarding the preparation of the PEA.

See also Master Responses 5 and 6 for a general discussion regarding the requirements for recirculation, which are not met here.

277. David Lee Comments

From: **David** <wyos@aol.com>
Date: Fri, Oct 17, 2025 at 9:15 AM
Subject: Support Remodel at current location-425 Sycamore
To: <jarroyo@mvschools.org>

I am not a proponent of transferring Middle School students to the 70 Lomita Site. The road leading up to the proposed site will not accommodate the heavy traffic and the street is too narrow for autos and bicycles, motorized and not. Lomita drive between Ashford and Shell hasn't been repaved for over 25 years. It has been patched here and there because the City owns the East side of the street and the County owns the West side of the street, splitting the responsibilities and creating no resolutions.

Additionally, the existing schools create heavy traffic, and noise pollution. Drivers speed down Lomita Drive causing unsafe conditions for pedestrians, bicycles, and animals.

I don't like to say that pre-teens and teens are irresponsible, but there is enough trash from the existing students walking down Lomita and on top of it, there is no safe sidewalk on Lomita even though a plan was introduced 6 to 7 years ago.

In closing, this proposal of having a Middle School in a somewhat quiet neighborhood will destroy the community and the quality of life here.

Thanks for taking in consideration the impact to the community.

David Lee
123 Lomita Dr.

Responses to David Lee Comments

Please see Master Responses 1 and 3.

278. Susan Dawson Comments

October 17, 2025

Mill Valley School District
Attn: Elizabeth Kaufman, Superintendent
Julio Arroyo, Director of Maintenance and Operations
411 Sycamore Avenue
Mill Valley, CA 94941
ekaufman@mvschools.org
jarroyo@mvschools.org

RE: Public Comment Read at School Board Meeting regarding the Environmental Impact Report

I am Susan Dawson, here as a parent of a child who loves Mill Valley Middle School. He really loves his teachers and friends, so I want him to be able to continue to learn with this wonderful group of people. I am tired, and I am sad, that this issue is tearing our community apart. The School Board is making things harder on themselves, and all of us, than it has to be.

If we as a community could have a little patience, the regulators could complete their review and advise on what mitigation will be required at the current site. We would then know, for certain, what the plan would be and whether it is financially feasible. If the plan is feasible, then those details could be reassuring. If it is not feasible, we'd have no choice but to pursue another option and hopefully people could make peace with that. The decision might make itself, without all this community discord.

I am not talking about a long delay. I am talking about a few months to allow the project to proceed in a rational sequence that identifies and addresses each threshold issue in order. This means completing the Preliminary Endangerment Analysis—all three steps through approval of the mitigation work plan—before seeking to approve an EIR. Reversing that order, as you are currently doing, is tantamount to writing a book report before you have finished all the reading. The end of a book often has a surprise twist, which can then make your report look foolish. That is exactly what happened with this EIR, which is almost entirely about a project that, it turns out, you cannot even build. Please don't repeat this mistake. Get all the data, get all the costs, explain your plan in detail, and only then bring a revised EIR back to us.

I thus implore the District to fully address the requests set forth in the MVMS Modernization Mess public comment letter. Thank you.

Responses to Susan Dawson Comments

The comment's requests are noted. Please see Master Response 7 regarding the preparation of a PEA and subsequent DTSC review, and the incorporation of relevant requirements regarding such review within the mitigation measures.

Please also see Master Response 1.

279. Jeremiah Atkisson Comments

From: **Jeremiah Atkisson** <jeremiah@somaequity.com>
Date: Fri, Oct 17, 2025 at 11:42 AM
Subject: RE: Comment on MV Middle school Modernization.
To: Jarroyo@mvschools.org <Jarroyo@mvschools.org>
Cc: Christy Atkisson <christydguzman@gmail.com>

All of below is 100% and I would add that putting the middle schoolers at Edna is at best a massive disruption and at worst completely displaces kids and parents who have developed a community around their school. The people pushing the district to use Edna as a temporary or perhaps permanent place to house the middle school would never support the same proposal if it were being suggested on their child's campus. The district has a responsibility to Edna families who have built their community around the school to find a truly equitable solution – using Edna is not it.

From: Christy Atkisson <christydguzman@gmail.com>
Sent: Wednesday, October 15, 2025 1:30 PM
To: Jarroyo@mvschools.org
Subject: Comment on MV Middle school Modernization.

Whom It May Concern,

I strongly urge the Mill Valley School Board of Trustees to select the current Mill Valley Middle School (MVMS) location at 425 Sycamore Avenue as the site for the future middle school and temporary housing during construction. This location is clearly the logical, fiscally responsible, and environmentally sound choice for our community.

In contrast, the alternative proposal to relocate the middle school adjacent to Edna Maguire Elementary School, on the Terra Marin site, presents numerous serious concerns that would negatively impact students, staff, parents, and surrounding neighborhoods.

In passing Measure G the taxpayers approved the use of funds to upgrade the middle school at its current location. This idea of moving the middle school was not voted on by the community and I'm sure would not pass if voted on now.

There are multiple reasons why the Edna site is not a good fit for a Middle school location. These are my main concerns

- The lot size does not meet the California Department of Education guidelines for a TK-8 campus. The current MVMS site is suitable for a 6-8 site. Why would we try toovercrowd an elementary School? Adding this many students doesn't allow for increased enrollment that will likely come in the next 10 years as babyboomers move on and housing inventory increases.
- Edna is not centrally located in the city. This would negatively impact traffic patterns across the city and add more cars, bikes and pedestrians to an already congested neighborhood with only one lane of traffic, and inadequate sidewalks for safe routes to school. Even with use of bike paths, students walking and riding to the middle school would have to cross traffic at the Edna carline entrance.
- The neighborhood surrounding Edna is prone to flooding and has terrible cell reception. This combined with the aforementioned traffic congestion creates hazardous conditions in the event of the need for evacuation during any emergency, including storms, tsunamis, fires, and active shooters. Proposed bussing and staggered start and finish times does not solve this problem.
- There has been no ingress/egress study on this neighborhood and as such choosing this neighborhood rather than a site on a main thoroughfare is irresponsible.
- Moving the middle school displaces West America TKD and aftercare–a small business that has been a vital part of the community for over 40 years and one that many working parents depend on for affordable aftercare.
- The Edna site is an archaeologically sensitive area. During its last renovation, Coast Miwok artifacts were discovered, confirming the location of a historical Tamal village. A 2025 study reaffirmed the site's significance. Further construction would risk additional discoveries, which could delay or even halt the project entirely. My 3rd grader is currently studying Miwok heritage while her district is actively evaluating a plan to disturb and or destroy it. This mixed message highlights our society's need to start walking our talk.
- Both Edna and MVMS are open campuses. Adding 756 students creates a campus of 1200 students. It's hard enough now to identify what kids and adults belong there on a daily basis. Moving upwards of 1000 people with MVMS staff from a 14 acre campus, to a 9 acre campus where there will be close to 1200 kids, and where elementary and middle schoolers will share buildings and fields opens up the potential for real risk. Just 2 years ago there was an instance of a man exposing himself in the girls bathroom at MVMS. And while I know horrific things like this could happen anywhere, keeping our campuses small makes it more manageable to mitigate these types of risks.

  And most importantly, the Draft EIR is clear in demonstrating that interim housing on the middle school campus is safe and meets all safety guidelines and outlines

with environmental and safety mitigation that remodeling the middle school will require.

The bottom line is that testing reveals that this project can be done within the standards of government required environmental and health agencies. So why are we still talking about it? Please do not make a decision about the future of our schools based solely on the fear of litigation. While the Edna/Horse Hill/Scott Valley/West America community has tried to remain positive in moving forward, I promise you, it is not without its own faction of prominent lawyers that would be mobilized if this less superior site plan comes to fruition.

Whatever decision you make, I know you do not make it lightly, I just hope you consider everyone's concerns, not just the loudest minority. Let's just get this project going. We've wasted far too much time and money giving airtime to a noisy minority.

Thank you,
Christy Atkisson

Edna Parent, West America TKD patron, and Mill Valley Taxpayer

Response to Jeremiah Atkisson Comments

Comment noted. Please see Master Responses 1-4. Cultural Resources issues associated with the Lomita site are addressed in the Chapter 5 of the EIR, with additional information added in this document.

280. Cameron Weissenseee Comments

From: **Cameron Weissensee** <cameroncw@gmail.com>
Date: Sun, Oct 19, 2025 at 9:25 PM
Subject: EIR & Potential Relocation of Middle School to Lomita
To: <jarroyo@mvschools.org>
Cc: <snakatani@mvschools.org>, <nkatz@mvschools.org>, <eabdoli@mvschools.org>, <mcrncichhodge@mvschools.org>, <yyoo@mvschools.org>

Dear Mr. Arroyo,
I am writing to you in response to the EIR and potential relocation of the middle school.

My initial draft had the typical inoffensive language one would expect to see in a letter such as this. However, it did not begin to express my frustration and rage at the sheer idiocy of even having to sit here and write in because a small minority of loud, insistent individuals are taking up my time and that of other Mill Valley residents to fight back against such an imbecilic proposition as relocating the middle school to Edna Maguire. There is no reality in which moving the school is a logical choice; it is far more detrimental economically and environmentally to construct an ample-sized middle school on what is an inferior and inadequate site.

I just heard that the opposition has submitted 159 page letter as part of the EIR process. Not only is that incredibly obnoxious (and I don't envy your responsibility in having to read that, and, frankly, my letter either), but it screams a group lacking actual numbers. Do we even know how many people are currently in support of moving the middle school to Edna? Have they submitted a signed petition? Those of us in the Alto-Sutton Manor area, as well as the surrounding neighborhoods, do have the numbers and we are prepared to litigate if this nonsensical and asinine process continues. To be getting pushed around by a bunch of bullies is unacceptable. We already have to deal with this enough from our federal government, we should not be allowing it to stand here. The two main culprits have, on multiple occasions, been infiltrating group chats either not intended for them or meant to be – at the very least – an open forum for discussion and instead used the platform to spread misinformation and hurl insults at other community members.

If the opposition is so concerned about the current middle school being located next to the sewage plant, why are they not fighting for improvements to the plant that would benefit the entire city of Mill Valley instead of just themselves? There should be ongoing concern about the plant being located in a flood zone that will be a serious issue by 2050 or sooner and the planning and infrastructure

necessary to future-proof the facility and location should be undertaken now, especially since it can then have the potential knock-on effect of benefitting the middle school by reducing odor and emissions.

And why stop there? Mill Valley is full is extremely wealthy individuals and the middle school should reflect that – it should be the envy of Marin public schools, not just a reimagining of roughly the same structure. Fundraise from the community and turn that area into something truly unique the way the Friends of the Fields benefactors did with the community center and adjacent fields. It took strong-willed individuals with vision pushing through something that could have been held up by bureaucratic red-tape and now every community member's lives are better for it. But I digress...

Instead, we have these parents fighting to tuck the school away back in an already overburdened community. It is the polar opposite of the community leadership and stewardship this town has had in the past; I can only imagine these individuals have not lived here very long and therefore haven't experienced the evolution, history, and work that went into making this town such a nice place to live and, rather, are out of touch with what the community actually needs. They are are acting disrespectfully and selfishly, looking out only for their own interests at the expense of others while not recognizing that what they're proposing hurts themselves as well. Having a middle school centrally located with multiple means of access from various modes of transportation – as the current site is – is far superior to any other option.

Traffic

The surrounding roads leading to Edna Maguire are already chaotic and dangerous enough as it is. Due to pervasive traffic issues going in and out of Mill Valley and the bottleneck along E Blithedale where the lanes merge into one, cars cut through the Alto Sutton neighborhood via Meadow Dr, often driving recklessly and in excess of the posted speed limit, which is too high as is it given the large number of families with young children living there. Moreover, due to the fact that Meadow is split between the City and County, there are numerous sections throughout the neighborhood without sidewalks. The excess traffic caused by adding hundreds of students will have a negative impact on both pollution/emissions and safety. For example, at the intersection of E Blithedale and Ashford where the Chevron is, there is a stop sign for cars coming from Ashford attempting to turn left onto eastbound E Blithedale. Not a month goes by that I haven't experienced a near collision as I'm heading eastbound while on E Blithedale and attempting to turn left to access Meadow Dr. Regardless of my having the right-of-way, cars coming from Ashford will cut in front of me, pull out without ever looking back right for oncoming traffic, or disregard the stop sign altogether. I personally witnessed – as I came around the corner and entered the turn lane – one car at the stop sign proceeding through the intersection with the

next two cars behind it following without ever stopping or looking right where they would have seen my car having to wait for them as they illegally ran the stop sign. This kind of behavior will only become more common with additional vehicles, increased stress from limited opportunities to cut across during breaks in traffic, and Mill Valley inhabitants' propensity towards selfish and audacious decisions during peak traffic times.

I raised the above concern back in 2017 with the Associate Engineer prior to the E Blithedale & Ashford Rehabilitation Project there. After continuing to experience issues, I reached out again in 2018 to the Project Manager – who brought it to the Traffic Safety Committee – citing the fact that both my wife and I had experienced either almost T-boning or being T-boned numerous times there and that the traffic control measures implemented effectively exacerbated the same issues I had raised prior. In 2021, noticing no improvement after the rehabilitation project, I followed up with the Public Works engineer and requested they consider putting time limits at the intersection whereby no left turns would be allowed during the typical school traffic times, but was wholly ignored. Instead, I was told that the intersection is monitored by MVPD; however (and although I was born and raised in Mill Valley, I admittedly didn't pay close attention to the intersection before, so can't speak to whether this has always been the case), in my 13 years of living in the neighborhood, I have not once seen an officer posted near the intersection. I suppose it's possible that there is one there at times, on-and-off, just always conveniently never when I walk or drive by numerous times throughout the day, everyday, but I somehow find that hard to believe. This anecdote is to serve as notice that should the middle school project go through and the safety concerns I have cited above continue to be an issue, then the School Board and City of Mill Valley will have formally been made aware, in writing, of said life safety issues and will have had prior knowledge should anything happen at that intersection resulting in serious injury or death.

Lastly, I would like to address the e-bike issue. Where the middle school is currently located, there are four separate primary entry points that children are able to use bikes (or other non-motorized transport) to access the school: both north and south directions of the bike path service various Mill Valley neighborhoods, Sycamore to downtown is directly to the west, and Enchanted Knolls (and, further away, Strawberry) can arrive from the east. Moving the middle school to Edna effectively reduces those means of egress to one: the northbound continuation of the bike path. Therefore, an undue burden would be added solely to the bike path for kids walking and biking, with all other modes of transportation being cars and buses via Lomita Dr. There is already currently enough of a hazard with the minimal number of kids riding bikes on that section of the path from where it intersects E Blithedale to Edna. While generally polite, there is a noticeable higher speed at which kids tend to ride, often in groups, and sometimes distracted by each other or even looking at their phones while riding.

Dogs, small children, and the elderly who frequent that path will be at considerably increased risk when the entire population of middle schoolers who take their bike or scooter to school are all funneled into that same section of the path at the same time of day. Add to that e-bikes exceeding speeds of 30mph and it will only be a matter of time before a serious injury occurs. All of this is easily avoidable by simply keeping the school where it is.

Drainage / Flooding

I don't like speaking on that which I haven't properly researched, but I'm out of time to perform the necessary due diligence and need to raise concern over the already pre-existing issue of water, drainage, and flooding in the area, Edna Maguire's current role in exacerbating that, and how any consideration of constructing a new middle school should be undertaking efforts to mitigate it, which would be very costly and weighed into this decision-making process. As an example of the correct way to handle water and drainage, I can direct you to the adjacent subdivision at Greenfield Court. Greenfield Park acts as a giant bioretention pond for the stormwater falling on the subdivision as well as the runoff from Horse Hill. That is what Edna should have done, but because the school is run by the State and not beholden to our local governance, we are left with a property with a lot of impermeable surface on which you can hear constant water running at the catch basins in the blacktop even in the dead of summer. All that water has to go somewhere and during wet winters plus King Tides – which we will be experiencing more severely in the coming decades – the pressure put on the culvert running behind the houses along Meadow Dr will turn an area that already gets dangerously close to flooding into an untenable one, with properties along the aforementioned Meadow Dr, Dorset Ln, Somerset Ln, and Shell Rd all being affected. It would be pertinent to know how, exactly, the drainage from Edna Maguire is currently handled and what the implications are of the Lomita Drive Road Rehabilitation project (e.g. are any tie-ins to Edna planned, will additional water be added to the storm drainage system, where does that water go now and does/will any of it impact the culvert, etc.). The Public Works project website is noticeably devoid of detail. Should Edna Maguire, the Lomita Drive Road Rehabilitation project, or any new proposed middle school in any way lead to increased burden on the culvert resulting in exacerbating the flooding issues in the area, please consider this email as serving notice that the impacted community members of the Alto Sutton neighborhood will deem the aforementioned parties responsible and litigate accordingly.

Displacement of Students and WATKD

Lastly, the decision to move the middle school to Edna Maguire will impact not only the current students, but also displace West America Tae Kwon Do, a long-standing, minority-owned family business that has had immeasurable impact on the community and continues to support the Edna students (and their parents) by offering after-school programs. Forcing them out of their current location would

be a disservice to all those who they serve today as well as the countless families who have taken part in their programs over the years and are a part of that shared experience and culture.

It is also unfair to the current edna students who would then have to be filtered into the other public school locations. They have developed relationships with their peers, the faculty and staff at Edna, all of which would be taken away. Furthermore, it would overburden the other schools, likely leading to a decrease in quality of our public school system overall, which impacts both our community and children directly as well as the value of living in such a town as Mill Valley to begin with.

If you've made it to the end of this email, thank you for your time, attention, and consideration of my diatribe. I find it despicable that I'm even being reduced to threatening litigation as a means of getting my point across, but since the opposition started that game plan and it seems to have worked on the School Board (the fact that we've even gotten this far in debating the merits of potentially moving the middle school being proof of that), it feels like the appropriate and necessary step. It is contemptible that the opposition initiated this frivolity and has insisted on wasting all of our collective time and tax payer money. I urge you to put an end to this as expeditiously and decisively as possible by keeping the middle school where it is and has been since 1972.

Cameron Weissensee
52 Meadow Drive
Mill Valley

Responses to Cameron Weissensee Comments

General Comments. The comment's preference with respect to school location is noted. Please see Master Response 1.

Traffic Comments. Existing traffic issues are not a project impact. Traffic associated with the Lomita Drive Alternatives is discussed in Chapter 5 of the EIR. Please see Master Response 3 regarding school traffic and emergency access issues at that site.

Drainage/Flooding Comments. The concerns regarding flooding expressed in the comment are noted. As noted in the comment, the Edna Maguire/Terra Marin site where an interim or alternative campus may be built is already mostly covered with impervious surfaces. Therefore, the proposed project would not substantially exacerbate any existing flooding issues downstream.

Displacement of Students and WATKD Comments. Displacement of students is not a physical environmental issue covered by CEQA. Potential portable structures that would need to be placed at other District elementary schools should students be displaced are described in the EIR. Please see Master Response 2 with respect to the potential WATKD displacement.

281. Miranda Lidl O'Connell Comments

From: **Miranda Lindl** <mirandalindl@gmail.com>
Date: Sun, Oct 19, 2025 at 9:09 PM
Subject: Draft EIR Comment
To: <ekaufman@mvschools.org>, <jarroyo@mvschools.org>
Cc: <ptacouncil@mvschools.org>, <cboc@mvschools.org>

Hi Elizabeth,

Thanks for all your hard work and receptiveness to comment. I really appreciate the increased transparency in the last year. Writing to repeat what has always been my concern with the remodel which is the placement of the students during construction.

I feel strongly that the students' education will be negatively impacted by being placed in portables in the skate park parking lot. The noise and dust of construction. The yet closer proximity to the rank smells of the sewage treatment plan. The flooding that occurs through the winter months.

It seems the board is set against Edna for either the temporary or permanent site which for those of us not in that neighborhood feel strongly there's a bias on the board against even realistically considering it. If Edna is not possible, then placement of temporary housing on Friends Field and the blacktop between the school and the fields would address many of these issues. Other options include only doing construction during no school hours including limiting the remodel to the summer.

I'm very invested personally. My oldest graduated from MVMS 2 years ago, my middle is currently in 7th grade and my 5th grade daughter, will start next year at MVMS. The 5th grader has dyslexia and I cannot imagine how much harder the next 3 years will be for her to achieve a positive education in such an environment. My hope is the trust I place with you and the board to keep her and others in mind going through your school in the next 3 years is well placed.

Thanks for hearing this.

Best,
Miranda

Miranda Lindl O'Connell

Responses to Miranda Lidl O'Connell Comments

Please see Master Response 1

282. Clara and Tim Daniels Comments

From: **Clara Daniels** <ccdaniels1@gmail.com>
Date: Sun, Oct 19, 2025 at 8:56 PM
Subject: Draft EIR Comment
To: <ekaufman@mvschools.org>, <jarroyo@mvschools.org>, <cboc@mvschools.org>, <ptacouncil@mvschools.org>
Cc: ICE Tim Daniels <tldaniels1@gmail.com>

As Mill Valley parents, we are writing to express our continued concerns with the state of the Mill Valley Middle School modernization plans. For years, the school district, school board, and community at large have been unable to find a satisfactory solution to the problem of our deteriorating middle school campus. Although we are strong supporters of public education, and we have seen first hand the incredible educations our children have received at their public elementary school, we had to make the difficult decision of moving our older child to private school for middle school and now we are looking to take the same step for our second child because nothing has changed.

While attending a school under construction is not ideal, we would be more open to that option if we felt the construction plans would ultimately address the environmental and safety concerns of the current campus site. As things stand now, the two options under consideration would put this next cohort of students in a construction zone, in temporary structures, and ultimately still keep them on a site and in a facility (however much is updated) that is suboptimal and possibly even detrimental to the health and safety of our children and the valued staff.

The "sunk costs" that we have already incurred do not justify moving forward with plans that ultimately do not provide the campus and learning environment that our children deserve.

Clara and Tim Daniels

Responses to Clara and Tim Daniels Comments

Please see Master Response. 1.

283. Michelle Passero Comments

October 19, 2025

Elizabeth Kaufman, Superintendent
ekaufman@mvschools.org
Julio Arroyo, Director of Maintenance and Operations
jarroyo@mvschools.org
Mill Valley School District
411 Sycamore Avenue
Mill Valley, CA 94941

Re: Comments on the Draft EIR for the Mill Valley Middle School proposed rebuild/renovation

Dear Superintendent Kaufman and Mr. Arroyo:

I appreciate the opportunity to comment on the September 2025 Draft Environmental Impact Report. I am a taxpayer in Mill Valley, a parent of two children that are attending and will be attending MVMS, and someone who voted in support of Measure G. In summary, I feel the Draft EIR needs a more comprehensive analysis of the preferred option to renovate the school before proceeding with a final decision. Many of the reasons are already reflected in the letter that was submitted by the Mill Valley Middle School Modernization Mess Association. Below are some additional points for the District to consider and address.

Provide spatial detail of location of toxin/methane exceedances referenced in the June DTSC letter in relation to where students congregate and where any portables would be located.
The June 2025 letter from the California Department of Toxic Substance Control outlined several soil/soil vapor testing locations that exceed public health standards. Please provide a spatial map of where these exceedances are/were located relative to where students frequently congregate and where any portables will be set up if the planned renovations move forward.

As part of alternatives for portables, consider/analyze prospect of doing any construction only during summer months when students are out of school to minimize disturbance to learning and exposure risks to health/safety

As part of an alternatives analysis, and especially if renovation is the final decision, please consider renovation/construction only during the summer months when school is not in session. Such a scenario could further reduce costs (or costs associated with portables) and minimize disturbance to students and any potential health and safety risks.

In addition to a more comprehensive EIR analysis that more fully examines the renovation and other alternatives, ensure that any EIR finalization takes into account the final review and response from the overseeing state agencies.
It appears that the finalization of the EIR is scheduled to occur following the close of public comment on October 20, 2025. Yet, feedback from oversight agencies like the Department of Toxic Substance and Control and the County Environmental Health Services on critical documents like the Preliminary Endangerment Assessment are outstanding and may not be provided until December. Their input is essential to this process and should be taken into account before any final decisions are made.

Thank you for taking these comments into account.

Sincerely,
Michelle Passero

cc:
Marin County Superintendent of Schools: superintendentsoffice@marinschools.org
Citizen's Bond Oversight Committee: cboc@mvschools.org
County Environmental Health Services: lbryant@marincounty.org
Department of Toxic Substances Control: Peter.Ruttan@dtsc.ca.gov; Tim.Crick@dtsc.ca.gov
California Department of Education: juan.mireles@cde.ca.gov
California State Architect: ida.clair@dgs.ca.gov

Responses to Michelle Passero Comments

See Master Responses 5 and 6 for a general discussion regarding the requirements for recirculation, which are not met here. Please also see responses to MVMS Modernization Mess comments, which address providing more information on alternatives and revising/recirculating the EIR (Comment 187).

Please also see Master Response 7, which discusses the DTSC's role in the preparation of a PEA and the incorporation of mitigation measures to ensure the preparation of a PEA.

Information regarding location of hazardous materials identified in subsurface testing is include in the PEA, which is available for review at the District Offices. The comment's suggestions regarding refinement of alternatives in the EIR are noted. Please also see Master Response 1.

284. Tom Geidt Comments

From: Tom Geidt <tgeidt@gmail.com>
Date: Sat, Oct 18, 2025 at 10:35 AM
Subject: Public comment on plans for MV Middle School
To: <jarroyo@mvschools.org>
Cc: <info@scottvalleyhoa.org>

Ms. Arroyo,

Please count me and my wife, Jamie, among those who support the position of the Scott Valley Homeowners Association in favor of Alternative 5 regarding the plans for MV Middle School. We strongly oppose the construction of a new middle school at the Lomita site, for all the reasons stated in SVHOA's prior correspondence to you.

Thank you for considering our views on this issue.

Tom Geidt
Jamie Geidt
6 Lower Drive
Mill Valley CA 94941
tgeidt@gmail.com

Responses to Tom Geidt Comments

Please see Master Response 1.

285. Thomas Wheatland Comments

From: **thomaswheatland** <thomaswheatland@proton.me>
Date: Sat, Oct 18, 2025 at 10:35 AM
Subject: Community Comment on Draft EIR and Project Direction – Mill Valley Middle School
To: Jarroyo@mvschools.org <Jarroyo@mvschools.org>

Dear Members of the Board,

As someone who lives near Edna Maguire Elementary, I see how closely our schools are tied to the daily life of this community. We all want what's best for our kids — safe, healthy, welcoming schools that reflect the care and pride of Mill Valley. That's why I hope you'll take a step back before moving forward with the current middle school modernization plan.

Lately, this project has started to divide neighbors who once stood side by side supporting Measure G. Some feel unheard, others feel rushed, and most of us just want confidence that the District is making the safest and smartest choices possible. I don't believe anyone on the Board wants to move too quickly — but from the outside, that's how it feels.

The environmental review still isn't settled, and important testing results are incomplete. We all know how sensitive that site is, sitting on old fill with ongoing review from state regulators. It would bring everyone much greater peace of mind if the District paused, completed every layer of safety verification, and let an independent expert confirm the findings before any approval. That kind of transparency would quiet most of the doubt.

At the same time, costs have grown far beyond what anyone expected. Maybe that's a signal that it's time to right-size the plan — to make the middle school a bit smaller and spread the remaining bond funds more evenly across all campuses. Every school deserves to share in the improvements we promised the community, not just one site.

The goal isn't to slow progress — it's to make sure progress brings people together. A brief pause, a little humility, and a commitment to balance could heal much of the tension that's built up around this project. Mill Valley has always prided itself on collaboration and fairness; this is the moment to show that again.

Please take this as a heartfelt request from a neighbor who deeply values our schools and the people who serve them. Let's take the time to make this project one the entire community can feel proud of — safe, fair, and built on trust.

Respectfully,
Thomas Wheatland

Responses to Thomas Wheatland Comments

The comments regarding the controversy surrounding the project, and the request to take a pause are noted. Please also see Master Response 1.

Please also see Master Response 7, which discusses the DTSC's role in the preparation of a PEA and the incorporation of mitigation measures to ensure the preparation of a PEA.

286. Amy Callinan Comments

From: **Amy C** <amy.parrish@gmail.com>
Date: Fri, Oct 17, 2025 at 11:17 PM
Subject: Concern About Proposed Middle School at 70 Lomita Drive
To: jarroyo@mvschools.org <jarroyo@mvschools.org>

Dear Members of the Mill Valley School Board,

My family lives near Edna Maguire, and we have a young son who spends most of his days playing outside. When we moved to Shell Street, we instantly fell in love with how safe, quiet, and kid-friendly it is. We would see kids riding their bikes and playing in their front yards. But in recent years, with the traffic from Edna Maguire alone, we already see cars speeding and driving carelessly through our neighborhood during pick-up and drop-off. We make multiple calls a year to the Sheriff's department asking for help with the reckless driving that is constantly happening. It's frightening, and the thought of tripling that traffic with a middle school is overwhelming.

Our neighborhood isn't designed for this volume of cars and buses. Parents already use our residential streets as a cut-through, and with hundreds more students and staff, the safety risks will multiply. I worry every day about my son and the other neighborhood children being outside when cars are flying by, distracted and in a rush. This plan would make that danger a permanent reality.

I fully support improving our middle school facilities. Our kids deserve the absolute best. But moving the campus to 70 Lomita doesn't fix the problem — it just shifts the burden onto Edna Maguire families and our neighborhood. Renovating the existing middle school campus is the smarter, safer solution.

As a parent, my greatest responsibility is to protect my child. I'm asking you to please protect all of our children — the ones who walk, bike, and play in this neighborhood every day — by keeping the middle school at Sycamore Ave.

Sincerely,
Amy Callinan

Responses to Amy Callinan Comments

Traffic and emergency access issues at the Lomita site are addressed in Chapter 5 of the DEIR, and further addressed in Master Response 3 in this document. Please also see Master Response 1 regarding preferences among alternatives.

287. Trish Stevens Comments

From: **Trish Stevens** <trishstevens12@gmail.com>
Date: Fri, Oct 17, 2025 at 8:19 PM
Subject: Comments on EIR
To: Julio Arroyo <jarroyo@mvschools.org>

Hi Julio,

As I have had more visibility and exposure to the varying viewpoints and data over the past several weeks regarding the MVMS project, what has become clear to me is that those most vehemently opposing constructing it in the existing location currently have children at the middle school and are not going to benefit from the renovation regardless. I think this context is incredibly important for any judge to consider in terms of "community input" and their underlying intentions. These parents do not want their children to be impacted by the district imminently moving forward with a renovation, so they would prefer to delay until their children are no longer in the school. I believe this is more an issue of construction inconvenience rather than legitimate concern. They are throwing out every possible unsubstantiated claim that requires further research and testing in order to see to it that this project doesn't get off the ground for several more years. I ask anyone considering the viewpoints in this case to look closely at ulterior motives.

Thank you,
Trish

Response to Trish Stevens Comments

The opinions stated in the comment are noted. Please see Master Response 1.

288. Bess Friday Comments

From: **Bess Friday** <bessfriday@gmail.com>
Date: Fri, Oct 17, 2025 at 4:42 PM
Subject: MV Middle School modernization project
To: <JArroyo@mvschools.org>

Julio,

I wanted to take time to express my concerns about the option of using Edna as the new site of the Middle School. Here are some of those concerns:

- Acreage doesn't meet CA. Dept. of Education guidelines

- Cannot handle projected enrollment increase

- Loss of centralized campus location

- Increased city-wide traffic congestion

- Displaces current tenants (our beloved West America!)

- Impacts Edna Maguire community (our beloved school & community!)

In addition, we want to highlight further consequences on the community:

- May impact the archaeologically sensitive Native American site at Lomita

- Loss of the Lomita soccer field

- Inadequate to accommodate exit in case of emergency or disaster for an increased student body and the surrounding community

- There are approx 757 students enrolled at MVMS and 428 at Edna as of 2023-2024. Combining campuses would potentially bring the new total to be 1,185, an 176.9% increase, nearly tripling the student body at the Edna/Lomita location.

- The above numbers are student only and have not even approached considerations needed for staff.

- It would displace our beloved West America TKD which our 2 kids have attendees for both aftercare and Tae Kwon Do for the past 5 years (for our 5th grader) and 4 for our

3rd grader. It's not just a 'sports' or 'aftercare' but such a hub for the community! Deeply saddened to think about loosing these beloved centers for our kids.

Thanks so much for hearing our concerns.

Bess Friday

Responses to Bess Friday Comments

The concerns expressed in the comment are noted. Please see Master Response 1-4. Archaeological resources are addressed in Chapter 5, with additional information provided in this document.

289. Julia Abramson Comments

From: **Abramsons** <theabramson3@gmail.com>
Date: Fri, Oct 17, 2025 at 4:41 PM
Subject: Opposition to MVMS 70 Lomita Drive
To: <jarroyo@mvschools.org>

Dear Members of the Mill Valley School Board and Superintendent,

I am writing to express my strong opposition to the proposed plan to build the new Mill Valley Middle School—with an enrollment of approximately 721 students—at 70 Lomita Drive.

While I fully support investment in quality education and the need for safe, modern school facilities, the decision to undertake a full rebuild at this particular site raises serious concerns about its impact on the surrounding neighborhood. The 70 Lomita site is located in a residential area with limited traffic infrastructure. A large-scale construction project here would worsen existing congestion, increase safety risks for pedestrians and cyclists, and cause prolonged disruption for both residents and students.

This neighborhood is already under significant strain from daily traffic. It currently supports an elementary school with around 450 students, as well as three baseball fields, a soccer field, and a basketball gym—all of which host year-round practices and games. The cumulative traffic from these facilities is already overwhelming. Additionally, Lomita Drive serves as a key bike route, connecting to other major paths in the area.

Adding a middle school of this size will drastically increase congestion, particularly during student drop-off and pick-up hours. The streets in this area were not designed to accommodate such high traffic volumes, leading to not only gridlock but also heightened safety risks for children walking or biking to school, as well as for nearby residents.

The 70 Lomita location is simply not suitable for a project of this scale. I urge you to reconsider this plan and instead rebuild at the **Sycamore site**, which offers more balanced access for all Mill Valley neighborhoods—whether by car, walking, or biking.

Thank you for your attention and consideration.

Sincerely, Julia Abramson

65 Lomita Drive, Mill Valley

Responses to Julia Abramson Comments

Please see Master Responses 1 and 3.

290. Todd Gates Comments (correction)

From: **Todd Gates** <gatestodd@yahoo.com>
Date: Fri, Oct 17, 2025 at 2:26 PM
Subject: CORRECTED Response to September Draft EIR for MVMS
To: jarroyo@mvschools.org <jarroyo@mvschools.org>

Mr Arroyo- I mistakenly wrote Mill Valley Middle School instead of Edna Maguire School on item D below and on the attached letter. Please note the correction. Thank you, Todd Gates

On Tuesday, October 7, 2025 at 07:39:44 AM PDT, Todd Gates <gatestodd@yahoo.com> wrote:

corrected email address for Julio Arroyo

----- Forwarded Message -----

From: Todd Gates <gatestodd@yahoo.com>

To: jarroy@mvschools.org <jarroy@mvschools.org>

Cc: snakatani@mvschools.org <snakatani@mvschools.org>; nkatz@mvschools.org <nkatz@mvschools.org>; eabdoli@mvschools.org <eabdoli@mvschools.org>; mcrncichhodge@mvschools.org <mcrncichhodge@mvschools.org>; yyoo@mvschools.org <yyoo@mvschools.org>

Sent: Tuesday, October 7, 2025 at 07:36:34 AM PDT

Subject: Response to September Draft EIR for MVMS

Mr. Arroyo-

Please find attached my correspondence regarding the Draft EIR for MVMS. I have also copied the Board members on this email, and I have copied the body of my letter in the rest of the email below. Please do not hesitate to contact me at this email (gatestodd@yahoo.com) or my cell, 650-280-0012, if you wish to discuss further.

Todd Gates

75 Lomita Drive

I believe the EIR reaches a reasonable conclusion by identifying Rehabilitation as the Environmentally Superior Alternative to the base Project to reconstruct the Middle School. However, the subsequent statement in the concluding paragraph of Chapter 5 that the Dual Schools at the Edna Maguire site would also reduce impacts and achieve more of the project's goals is without sufficient information or analysis, and it invites controversy.

Nearly three quarters of this report from Chapter 2 through Chapter 4 addresses environmental risks, impacts, and mitigations in great detail at the existing middle school site. There are only several pages in Chapter 5, however, that mention impacts to the Alto neighborhood surrounding Lomita Drive and the Edna Maguire School.

Many considerations are missing in the EIR to justify moving the middle school to the Edna Maguire/Terra area. Mill Valley School District Board should evaluate all the environmental and civic impacts to the Alto neighborhood before making such a decision. I think they will find the decision is wrong.

Some of these other considerations include the following:

A. The Edna / Terra location involves a different history that include native American communities and dairy farms. The underlying strata has changed over the period. The location, at the base of Horse Hill, is near forest land in which different wildlife exists than that of the existing middle school site. The EIR addresses neither of these different conditions.

B. The geology and the drainage patterns are also different at the base of Horse Hill. Not only is there a contained stream that runs under the existing school, but stormwater runoff from adjacent hillsides causes soil erosion and flooding that already overwhelms the Lomita drive drainage system and sends water and debris on to nearby properties. Any additional excavation for new construction at the east end of the Terra Linda property where the Horse Hill is very steep would exacerbate the problem.

C. At the base of Horse Hill, The Edna/Terra site is a few blocks away from a Moderate Fire Hazard Severity Zone, while the middle school site is much farther away from any Fire Hazard Severity Zone.

D. A high-pressure gas main runs under "north-south" Lomita Drive and directly under the existing Edna Maguire school

E. The area surrounding the Edna/Terra site is much more residential than the area surrounding the middle school site. Noise, air quality, and dust impacts have only a

cursory mention in this EIR for this area compared to the substantial analysis around the middle school site.

F. While the EIR acknowledges that the increased student, teacher and administration population would create traffic and parking problems in the residential Alto neighborhood around Lomita Drive, it largely dismisses the issue saying that traffic problems are not considered as impacts under CEQA. The conditions in Alto are very different from the roads and sidewalk at the middle school, which have two lanes each way and traffic lights. The increased impacts on Lomita Drive are real.

The suggestion that staggered start times would help ease congestion is insufficient. The commuting population would increase by three times, and probably more if either of the two schools' populations reached capacity. The proposed reduction of the Edna Maguire parking and circulation loop for drop-off/pick-up will back traffic onto Lomita more than it already does. A new parking area east of the Terra site for the additional school population will make Lomita congestion even worse since the two entries would be so close together. Additionally, the recent closure of Miller Ave Whole Foods is already bringing more traffic to the Whole Foods on the Lomita corridor.

G. From a safety standpoint, emergency services to the school and the neighborhood would be compromised. More importantly, emergency egress from the Alto/Terra site would become severely limited in the case of fire, gas explosion, campus terrorism, flooding, or earthquake.

Also from a safety standpoint, while many students can walk to school on the "north-south" bike/pedestrian path, many neighborhood students use the sidewalks on Lomita Drive which are old and narrow like Lomita Drive itself. On "east-west" Lomita Drive, there is also a bike lane parallel to residential parking. Cars often cannot pass each other at the same time without swerving into parts of the road that students spill onto from narrow sidewalks or the "east-west" bike lane.

H. Complicating this insufficient surface infrastructure is the fact that alternating segments of Lomita Drive and sidewalks are managed by different jurisdictions- the City of Mill Valley and the County. Resurfacing of Lomita (North South) was last performed in 1997. Lomita Drive from Ashford Ave up and past the Edna/Terra site has been neglected for decades because the County and the City do not coordinate very well together. County Supervisor Moulton Peters has observed this breakdown while serving on City Council and now on the County Board. She has intervened with only marginal impact.

The County, at least, is now nearing completion of a long-planned improvement to the drainage system and road/sidewalk surfaces on “east-west” Lomita Drive. The reconstruction of the Terra site would interfere with that work, and history suggests that the School District will not coordinate with those efforts very well.

The School District is part of this jurisdictional puzzle and has not been responsive to road improvements in front of the Edna Maguire that were promised over a decade ago at the new entry way to Edna Maguire. See Item 2.J of the January 2012 Agreement, of which I was a part.

The notion of building the middle school at the Edna/Terra site in place of or adjacent to the existing elementary school is a significant departure from voter approved Measure G which advertised using the existing middle school site for Mill Valley Middle School reconstruction. I do not believe the measure would have been passed if a move to the Alto neighborhood was presented in the original plan. It certainly would have created controversy if for no other reason than the Terra site adjacent to the Edan Maguire school is half the size of the existing middle school site.

While I am somewhat sympathetic to some people’s concerns about the nearby wastewater plant or the historic dump, I think there are very reasonable responses that should assuage any worry. First, both wastewater plants and old landfills are well regulated and constantly evaluated under state and federal laws. These kinds of facilities exist and operate safely near populations all over the country. The potential risks are well understood and managed. There are proven construction methods regularly performed that protect the well-being of people when building atop landfills. At the wastewater plant, tens of millions of dollars have been spent very recently to upgrade the facility. Many of the improvements were to reduce odors, and they continue to invest in odor reducing measures.

Furthermore, history does not suggest that there have been health problems associated with the current location of the middle school. I have not heard of any health impacts to students, teachers, or administrators during its existence. My children attended the existing middle school fifteen years ago and did not suffer from sewage odor or existence of garbage below them. I know teachers who worked there for years and speak of neither as a lasting concern.

By identifying Rehabilitation on the middle school site as the Environmentally Superior Alternative to the base Project, the EIR also better provides for one of the Project objectives which is green building practices. Renovation of the existing middle school building is a far superior green practice than demolition, disposal and subsequent

construction of a new building which is what the Dual Schools alternative would require of the Terra building. The EIR is plainly wrong at the end of Chapter 5 when it says this Dual School alternative would reduce impacts to air quality, biological resources, hazards, hydrology and geology compared to the proposed Project. It has simply neglected to evaluate those issues and many others at the Edna/Terra site.

The Dual Schools alternative at Edna/Terra also begs the question as to what the District would intend to do with existing middle school site.

I ask the Mill Valley School District Board to refocus effort on using the existing middle school site for new construction or rehabilitation of the Mill Valley Middle School as was originally presented under voter approved Measure G. To do otherwise invites controversy, creates resentment, and leads to dispute.

I appreciate your consideration of my opinions and invite you or any of the Board Members to discuss matters more if you are willing.

Sincerely,

Todd Gates

cc: MVSD Board Members by email

Responses to Todd Gates Letter

The correction is noted. Please see Responses to Comment 164.

291. Sarah Toomey Comments

From: **Sarah E. Toomey** <sarahelizabethtoomey@gmail.com>
Date: Fri, Oct 17, 2025 at 9:36 AM
Subject: Support of MVMS Modernization Project on Sycamore Drive Campus
To: <jarroyo@mvschools.org>, <ekaufman@mvschools.org>
Cc: David Toomey <Dtoomey70@gmail.com>

Dear Julio and Elizabeth,

I am writing as a mother of three, including two current students at Edna Maguire. I want you and the board to know that I am in full support of the Mill Valley Middle School modernization project at the existing middle school site on Sycamore Drive, as approved by voters through Measure G. Renovating the current campus provides a sound path that will ensure safe and inspiring facilities for our students for decades to come.

I am, however, firmly opposed to using 70 Lomita Drive, either temporarily or permanently, as a middle school site. There are several compelling reasons why the Lomita location is not appropriate:

Social Dynamics

Combining elementary and middle school students on a single campus raises serious developmental, social, and safety concerns. Younger children and adolescents have vastly different emotional needs, maturity levels, and social dynamics. Placing them in the same environment can expose elementary-aged students to influences, language, and behaviors they are not yet ready to navigate, while limiting older students' ability to develop independence and leadership among their peers. Academically, the learning environments, schedules, and support systems required for these age groups differ significantly, making it difficult for one campus to effectively serve both without compromising quality. Keeping elementary and middle school students separate allows each group to thrive in spaces designed for their developmental stage: fostering confidence, focus, and a stronger sense of community.

Safety Risks

If the District were to use the Lomita site, even temporarily, an emergency such as a wildfire or other threat could create dangerous evacuation gridlock. While staggered start times may help ease traffic under normal conditions, that approach would be meaningless in a crisis, when all students and staff must evacuate simultaneously.

Compounding this risk, our neighborhood has virtually no cell reception, and Edna's campus serves as our designated safety zone where residents are instructed to gather for help or evacuation. If that same space were filled with more than 800 middle school students trying to locate their parents, the result would be confusion and chaos at the very moment clear communication and coordination are most critical.

Maintaining Edna's Aftercare Programs

Many families (ours included) rely on the incredible aftercare and enrichment programs provided by West America Tae Kwon Do on the Lomita campus. This program is more than just childcare; it is the only truly affordable option for families with two working parents like so many of us striving to make a life in this community.

Beyond affordability, the program instills values of discipline, respect, and focus that have had a profound impact on our children. The instructors lead with compassion and consistency, creating an environment that supports both working parents and the healthy development of our kids. Closing this center to accommodate a middle school at the Lomita campus, whether temporarily or permanently, would be devastating, not only for our family but for countless others who depend on it for stability, community, and growth.

Traffic and Parking Impacts

Locating nearly 800 middle school students and staff at 70 Lomita would overwhelm an already overburdened traffic loop around Edna Maguire Elementary. The District's own environmental analysis indicates traffic congestion is likely to increase, possibly significantly, creating unsafe conditions for walkers, cyclists, and drivers. Parking spillover would further strain an area already struggling under heavy traffic from cars, pedestrians, bicycles, and equestrians during Edna Maguire's drop-off and pick-up times.

As a resident living on Lomita Drive, I can assure you that traffic on this street is already a serious issue, and at times, extremely dangerous for children. We face tremendous congestion being so close to Whole Foods, the post office, the Islamic Center, CVS, The UPS Store, the after-school music center, the gas station, the busy bike path connecting Mill Valley and Corte Madera, horses sharing the road, and heavy traffic from Edna Maguire. Adding hundreds of middle schoolers would make this corridor far too dangerous. We walk to and from school daily, often fearing for our children's safety due to the speed of cars and e-bikes on our street. I urge you to recognize the disregard for safety that would result from adding to this already hazardous situation.

Conclusion

In contrast, the current Sycamore Drive site is larger, centrally located, environmentally vetted, and designed to accommodate long-term growth while minimizing the impact on neighborhoods and services. Renovating there is both the prudent and community-oriented choice. It was chosen many decades ago for our middle school and should remain the site for the next chapter of its future.

I urge you to honor the intent of Measure G voters, prioritize student and community safety, and move forward with modernization at the existing Mill Valley Middle School site.

Thank you for your consideration and for your service to our community.

Sincerely,

Sarah Toomey

Responses to Sarah Toomey Comments

Please see Master Responses 1-3. Social dynamics is not a CEQA issue.

292. Will Coddington Comments

From: **Will Coddington** <willcodd1@gmail.com>
Date: Thu, Oct 16, 2025 at 8:40 PM
Subject: Comment on Draft EIR for Mill Valley Middle School
To: <jarroyo@mvschools.org>

Dear Mr. Arroyo,

I'm a Mill Valley parent and homeowner commenting on the Draft EIR for the Middle School project.

I support **renovating and modernizing the existing Sycamore Avenue campus**. The site is centrally located, allowing most families to walk or bike, which shortens commutes and minimizes traffic across town. The EIR shows **impacts at this site are manageable** with appropriate mitigation.

If possible, please **reduce reliance on the interim portable classrooms** by keeping portions of the main building in use during renovation to avoid **excessive crowding**. Continuous methane monitoring during construction is also important for transparency and safety.

I **oppose relocating the school to Lomita Ave**. That site sits in a far corner of the city, among a residential neighborhood, reached by a single congested street, and would force many more parents to drive their children.

Finally, I urge the District to remain **fiscally responsible with Measure G funds** by improving the current campus rather than building anew. Renovation meets educational goals without unnecessary expense or delay.

Thank you for your work on this project and for hearing my comments.

Sincerely,

Will Coddington

Responses to Will Coddington Comments

Please see Master Response 1.

293. Nejat Duzgunes Comments

From: **Nejat Duzgunes** <nduzgunes@pacific.edu>
Date: Thu, Oct 16, 2025 at 8:24 PM
Subject: Middle School Modernization
To: jarroyo@mvschools.org <jarroyo@mvschools.org>

Hello,

Following the report of the Marin County Civil Grand Jury report in 2008 on the earthquake safety of Marin County schools, I strongly urge you to not use the current building which has prefab slabs that are a severe hazard in case of a strong earthquake.

Thank you.

Nejat Duzgunes

Response to Nejat Duzgunes Comments

As clarified in the Final EIR, Alternative 5 would not renovate either the existing building or foundations to meet current seismic codes. The potential for seismic hazards would remain low in part due to the protections afforded under the legal framework applicable to the original construction. The Mill Valley Middle School campus was built in 1972 under the Field Act, one of California's strongest and most successful school safety laws. The Field Act requires all public school buildings to be designed by licensed architects and structural engineers, reviewed and approved by the Division of the State Architect (DSA), and inspected during construction to verify compliance with rigorous seismic standards. Since its adoption in 1933, no Field Act–compliant school building has collapsed or caused student injury in an earthquake.

To the extent there are any existing seismic hazards, CEQA generally does not require an analysis of the impact of existing environmental conditions on a proposed project. (*California Building Industry Association v. Bay Area Air Quality Management District* (2015) 62 Cal.4th 369, 377 [holding that agencies subject to CEQA are generally not required to analyze the impact of existing environmental conditions on a project's future users or residents].) To the extent there are existing seismic hazards at the site, such hazards are considered existing conditions of the site and are not project impacts requiring analysis or consideration under CEQA. In some cases, CEQA may require additional analysis where a project risks exacerbating environmental hazards or conditions that exist. (*East Sacramento Partnerships for a Livable City v. City of*

Sacramento (2016) 5 Cal.App.5th 281, 296.) As discussed above however, the alternative would not exacerbate any existing conditions and therefore CEQA does not require any additional analysis of the impacts of sea level rise on the Project. (*Id*. at 296-97.)

With respect to the seismic safety of the Interim Campus at the MVMS site, the proposed foundation design has been reviewed by the California Geological Survey on behalf of the State Architect and determined to be appropriate to address seismic hazards including settlement and liquefaction[18].

[18] California Department of Conservation, California Geological Survey, Letter to Elizabeth Kaufman, Superintendent, Mill Valley School District, November 12, 2025, *Second Engineering Geology and Seismology Review for Mill Valley Middle School - Proposed Interim Campus. 425 Sycamore Street, Mill Valley, CA*. CGS Application No. 01-CGS6942.

294. Lindsay Harris Comments

From: **Lindsay Harris** <harrislm@usfca.edu>
Date: Mon, Oct 20, 2025 at 9:01 AM
Subject: Comments on Middle school Modernization
To: jarroyo@mvschools.org <jarroyo@mvschools.org>

Hello,

I am the parents of an MVMS 6th grade student and an Edna Maguire 1st grade student. So, I have a vested interest in both schools! I really believe that the best path forward, given all of the evidence, is to renovate the current middle school in its current location. The location of the middle school is honestly ideal at present — there's access to the rec center (where the "Teen Zone" is available), as well as easy access via Sycamore avenue to downtown mill valley and also easy bike path routes to Safeway and other after-school locations for the kids.

Edna Maguire is a very special community and has been an absolutely critical place of development for both of my children, who both have IEPs and disabilities. The expertise and community at Edna are incredible and it would be such a loss to disband our largest elementary school community in Mill Valley. I think that the Middle Schoolers are at an age where they can live through some challenges — and I say this as the mother of an autistic child who will struggle with the change of routine and relocation to portables. I think it's a necessary "evil" and the middle schoolers can endure it and we'll build a better middle school in an excellent location for years to come.

All my best

Lindsay

***

Lindsay M. Harris
Professor of Law
Director, Frank C. Newman International Human Rights Clinic
University of San Francisco School of Law

Responses to Lindsay Harris Comments

Comment noted. Please see Master Response 1.

295. Jen Conway Comments

From: **Jen Conway** <conwayjj@hotmail.com>
Date: Mon, Oct 20, 2025 at 8:57 AM
Subject: Public Comment on MVMS Modernization
To: ekaufman@mvschools.org <ekaufman@mvschools.org>, jarroyo@mvschools.org <jarroyo@mvschools.org>

Dear Dr. Kaufman and Mr. Arroyo,

My name is Jen, and I am very concerned about the MVMS modernization school project. Firstly, I have a daughter that has attended (Ella, now a senior at Tam) and a daughter who is currently attending (Zoey, 7th grade) MVMS. Therefore, this project is close to heart and I have been following the MVMS modernization process every step of the way.

In general, over the years, I have to say that the smell from the sewage treatment plant has been terrible. The last meeting I went to you, Elizabeth, assured us that the sewage plant was taking measures to make 'it better', like adding covers/lids to the sewage tanks. In fact, you asked during the meeting 'doesn't it smell better?.' But it didn't and hasn't smelled better. In fact, that day as I walked into the meeting it smelled foul. Also, on Back to School Night it smelled, as well as, walking by MVMS to Bayfront fields to watch my daughter's soccer games on the weekends this fall. There has only been a handful of times where I have visited campus that it hasn't smelled. It is such a shame that we live in this beautiful, and very wealthy, town/community and that our kids have to go to school with this smell almost daily. The location literally stinks!

Ella: "The smell while I went to MVMS was bad. I remember one time it got so bad when I was in 8th grade, we wanted to go into the library to escape the smell at lunch, and many other kids had the same idea. It became a safely hazard and they kept us outside in the stink!"

Zoey: "The stink has attracted many flies recently. It caused a lot of disruption to our learning, as it was distracting many students. There are even still flies now, weeks after the incident (my teacher said one of the doors of the tanks was left open)" Also, she doesn't want her last year (8th grade) to be in portables in the parking lot. I'm sure that the smell/flies, directly across from the sewage plant, will be worse … along with the disruption/distraction of construction noise.

The location across from a sewage treatment plant is not ideal or healthy to begin with. Now during the modernization process, I am finding out that the school also sits on a

former dump site with contaminated soil underneath, and in a flood zone, with rising sea levels and ground liquification problems etc. With so many issues, isn't it time to step back and really evaluate if this is the right location for the middle school?!

Finally, I agree with the MVMS modernization mess public letter. We are pouring millions of tax dollars into a somewhat temporary fix. We need a long term solution - a safe school with a healthy environment where our kids and teachers thrive. We want a middle school that we are proud of that will retain families and draw in others to this special town.

Thank you,

Jen Conway

Responses to Jen Conway Comments

The opinions expressed in the comments are noted. Odor issues at the Project site are described and analyzed in the Air Quality chapter of the EIR. MVMS Modernization Mess comments are addressed in Responses to Comment 187, above.

296. Sarah Cope Comments

From: **Sarah Cope** <sjcope1124@gmail.com>
Date: Mon, Oct 20, 2025 at 9:51 AM
Subject: Comments on Draft EIR for the MVMS Modernization Plan
To: jarroyo@mvschools.org <jarroyo@mvschools.org>

Director Arroyo,

As an Edna Maguire parent, not as an Edna PTA board member, I would like to provide comments on the draft EIR for the MVMS modernization plan. After reviewing the draft EIR, I feel the most rational option is to renovate the existing middle school and house existing middle school students in portables on site. Constructing a new middle school or building temporary housing for any portion of 6th-8th graders would cause upheaval and significant disruption for the students, teachers and staff of Edna Maguire as well as the surrounding neighborhood. I do not see any safety issue in the draft EIR that would justify such a disruption. Further delays in the project only serve to use money that could be better spent on the renovations.

Thank you,

Sarah Cope

sjcope1124@gmail.com

Response to Sarah Cope Letter

Please see Master Response 1.

297. Aparajita Sohoni Comments

From: **Aparajita Sohoni** <sohoni79@gmail.com>
Date: Mon, Oct 20, 2025 at 9:50 AM
Subject: Alt 1
To: <jarroyo@mvschools.org>

Dear Julio,

Thanks for all your work on Measure G!

I'm a huge fan of remodeling at the **current location** (Alt 1). I want this project to get moving! While it won't benefit my oldest child, I'm hoping my younger 2 (currently in 4th at Edna and 6th grade at MVMS) will get to experience a new/safer campus.

Also, as I live near Edna, the idea of converting Edna to a massive middle school seems crazy. The traffic alone in this area would be *awful*.

Thank you for reading this,

Aparajita

Responses to Aparajita Sohoni Comments

Please see Master Response 1.

298. Melissa Jenkins Comments

From: **Melissa A. Jenkins** <melissa.anrig.jenkins@gmail.com>
Date: Mon, Oct 20, 2025 at 10:07 AM
Subject: Draft EIR Comment
To: jarroyo@mvschools.org <jarroyo@mvschools.org>, ekaufman@mvschools.org <ekaufman@mvschools.org>
Cc: ptacouncil@mvschools.org <ptacouncil@mvschools.org>, <cboc@mvschools.org>

Dear Dr. Kaufman and Mr. Arroyo,

As a Mill Valley parent of two fifth graders, I'm deeply concerned about the health and safety of our students and teachers given the site's documented contamination. The District **should not approve any project** before confirming that it meets seismic and environmental safety standards. Please complete the full soil testing and mitigation plans before finalizing a decision, and seriously consider potential district sites, including the Edna Maguire site, as a safer, more cost-effective alternative and long term solution for all future students.

The soil sampling done to date was incomplete and already showed several exceedances above safety levels—including toxins and methane. DTSC has requested additional testing, yet the community still hasn't seen this critical data. Without it, we can't know the true safety of the site for our children or staff.

Equally troubling, we don't know the potential impact of **installing foundations for temporary housing on soil gases or existing contamination**. Disturbing the ground before the full data and mitigation plan are complete could make conditions worse, not better.

What we'd like to avoid is investing **north of $100 million** into rebuilding on a site that still faces unresolved **seismic and sea-level rise risks**—issues that could become urgent within the next decade. Without addressing those now, we'll likely be facing another costly bond measure far sooner than taxpayers or the district should accept.

The district should conduct a **rigorous, side-by-side analysis of all available sites** before locking in a plan. When Edna Maguire was initially evaluated during consideration of the rebuild option, it was determined that the campus size met state criteria for a middle school. The site was dismissed largely due to projected enrollment growth—but those projections never materialized. In fact, **Edna's enrollment has steadily declined**, while **Tam Valley is now the most populous elementary school**.

Edna may or may not be the ultimate solution, but it unquestionably **deserves a fair, current analysis** using today's data—not assumptions from years ago.

I strongly urge the Board to pause any decisions to rebuild, remodel, or place temporary classrooms at the current site until:

- All DTSC-requested soil and methane data is complete and publicly shared.
- Seismic and sea-level rise risks are meaningfully addressed.
- A comprehensive evaluation of all potential district sites—including Edna—is performed with up-to-date enrollment, traffic, and environmental data.

Our students—today and for generations to come—deserve a school that is safe, sustainable, and fiscally responsible, built on sound science and honest analysis. Please take the time to get this right.

Warm regards,
Melissa Jenkins

Mill Valley School District Parent and Resident

Responses to Melissa Jenkins Comments

The comment's requests are noted. Please see Master Response 1 regarding any preferences or opinions expressed about the Project and the alternatives analyzed.

See also Master Response 7 for a discussion regarding the DTSC's review and the forthcoming finalization of the PEA, the preparation of which is incorporated into two mitigation measures.

As clarified in the Final EIR, Alternative 5 would not renovate either the existing building or foundations to meet current seismic requirements in the building code. The potential for seismic hazards would remain low in part due to the protections afforded under the legal framework applicable to the original construction. The Mill Valley Middle School campus was built in 1972 under the Field Act, one of California's strongest and most successful school safety laws. The Field Act requires all public school buildings to be designed by licensed architects and structural engineers, reviewed and approved by the Division of the State Architect (DSA), and inspected during construction to verify compliance with rigorous seismic standards. Since its adoption in 1933, no Field Act–compliant school building has collapsed or caused student injury in an earthquake.

To the extent there are any existing seismic hazards, CEQA generally does not require an analysis of the impact of existing environmental conditions on a proposed project. (*California Building Industry Association v. Bay Area Air Quality Management District* (2015) 62 Cal.4th 369, 377 [holding that agencies subject to CEQA are generally not required to analyze the impact of existing environmental conditions on a project's future users or residents].) To the extent there are existing seismic hazards at the site, such hazards are considered existing conditions of the site and are not project impacts requiring analysis or consideration under CEQA. In some cases, CEQA may require additional analysis where a project risks exacerbating environmental hazards or conditions that exist. (*East Sacramento Partnerships for a Livable City v. City of Sacramento* (2016) 5 Cal.App.5th 281, 296.) As discussed above however, the alternative would not exacerbate any existing conditions and therefore CEQA does not require any additional analysis of the impacts of sea level rise on the Project. (*Id*. at 296-97.)

With respect to the seismic safety of the Interim Campus at the MVMS site, the proposed foundation design has been reviewed by the California Geological Survey on behalf of the State Architect and determined to be appropriate to address seismic hazards including settlement and liquefaction[19].

With respect to issues relating to the enrollment and data assumptions for purposes of the EIR's analysis, see Response to Comment #9 in the Responses to Mill Valley Modernization Mess Comments (#187), above.

[19] California Department of Conservation, California Geological Survey, Letter to Elizabeth Kaufman, Superintendent, Mill Valley School District, November 12, 2025, *Second Engineering Geology and Seismology Review for Mill Valley Middle School - Proposed Interim Campus. 425 Sycamore Street, Mill Valley, CA*. CGS Application No. 01-CGS6942.

299. Kate Roth Comments

From: **Kate R.** <lkateroth@gmail.com>
Date: Mon, Oct 20, 2025 at 10:10 AM
Subject: Letter in Supporting Use of Current Location for MVMS Renovation
To: <ekaufman@mvschools.org>, <jarroyo@mvschools.org>, <LetterstotheBoardofTrustees@mvschools.org>

Dear MVSD Board of Trustees, Superintendent Kauffman, and Mr. Arroyo,

First, I want to sincerely thank you for your continued dedication and the countless hours you're putting in to navigate the many challenges facing our district. I know this work isn't easy, and I truly appreciate your efforts to do what's best for our students, staff, and community.

I'm writing as a parent with a child at Edna Maguire Elementary, and as someone who, like many families here, supported Measure G wholeheartedly. We believed—and still believe—in updating our aging facilities to create better learning spaces for students and better teaching environments for educators.

However, three years later, it's hard not to feel discouraged. Instead of progress, our community has been caught up in:

-A reduction in available funds due to ongoing litigation

– Disturbing the Native American Archaeological Site at 70 Lomita;

-Squeezing the current middle school footprint (~14 acres) into the 70 Lomita site of ~4 acres;
-Growing division within our community, driven by shifting demands from a small but persistent opposition
-A district forced to focus on damage control rather than on modernization and student learning

We're now at a critical point. To stay on track—ordering portables and materials for the 2026 school year, starting construction over the summer to minimize disruption, and keeping both the Edna Maguire and MVMS communities intact—we need to make a practical, timely decision.

When you look at the facts, the **most rational, safe, and responsible path forward** is to renovate the existing middle school, with temporary 6th–8th grade housing in portables at Friends Field.

At this point, it's fair to ask: what more can we test, mitigate, or compromise before we're allowed to move forward? Our kids deserve action, not endless delay.

I know you're carrying the weight of difficult decisions, and I want you to know there's a large group of parents and community members who support you. Please, take the sensible route and move forward with what's best for our students.

Thank you for your time, your perseverance, and your commitment to our schools.

With gratitude,
Kate Roth
Parent, Edna Maguire Elementary

Response to Kate Roth Comments

The comments are noted. Please see Master Responses 1 and 4. Tribal Cultural resources are addressed in Chapter 5, Alternatives, in the EIR.

300. Kasia and Diego Meller Comments

From: **Kasia Meller** <kasia.t.meller@gmail.com>
Date: Mon, Oct 20, 2025 at 12:53 PM
Subject: Draft EIR Comment
To: <ekaufman@mvschools.org>, <jarroyo@mvschools.org>
Cc: Diego Meller <diego.meller@gmail.com>

Dear Dr Kaufman and Mr Arroyo,

First, we want to express our **deep gratitude to the Mill Valley School District leadership, teachers, and community** for the **excellent education and supportive environment** you continue to provide for our children. The dedication to maintaining high academic standards while investing in safe, inspiring facilities does not go unnoticed. Our kids are **thriving in Mill Valley**, and we are truly thankful for your relentless work to improve both infrastructure and learning opportunities.

We are concerned parents of current 4th- and 5th-grade students who will begin feeding into Mill Valley Middle School next year. With the Draft EIR comment period closing today, we would like to offer a **practical, district-owned alternative** that ensures **safety, fiscal responsibility, and minimal classroom disruption**.

The environmental and geotechnical reports make clear that the current middle-school site faces **serious long-term constraints**: it was built on historic fill, is exposed to **flooding and sea-level rise**, and continues to suffer **odor and air-quality issues** from the adjacent wastewater facility. None of the reports confirm that the original 1970 structure was designed under the **California Field Act** or meets **current seismic standards**.

In contrast, the **2021 MVSD Facility Master Plan** shows that the combined **Edna Maguire and former Terra Marin property** spans approximately **10 acres with nearly 125,000 sq ft of existing facilities**—already the **largest and most accessible district-owned school site**, directly connected to safe bike and pedestrian routes.

This allows for a clear, staged plan that keeps every student learning uninterrupted:

Proposed Three-Step Phased Plan

Step 1 – Year 1: Refurbish the former **Terra Marin campus (70 Lomita Dr.)** into a new **elementary school** while all current schools continue operating normally.

Step 2 – Year 2: Once the new elementary campus opens, **repurpose Edna Maguire (80 Lomita Dr.)** as the new **middle school**. Elementary students will already have moved; middle-school students remain at the existing MVMS during this phase.

Step 3 – Beginning of Year 3: Relocate middle-school students to their new, modernized Edna campus. The old middle-school site can then be cleared and transformed into **flood-resilient, first-class turf sports grounds** serving both the district and the community.

This approach:

- Utilizes **district-owned property only**,
- Fits within **Measure G funding**,
- **Avoids rebuilding on a landfill**, and
- Ensures **zero student displacement** during construction.

We respectfully request that this **"Edna = Middle School / Terra Marin = Elementary"** phased alternative be analyzed in the **Final EIR** alongside the current proposal.

Thank you for your consideration and for your continued commitment to student safety and educational excellence.

Sincerely,
Kasia and Diego Meller
Mill Valley Residents & Parents

Responses to Kasia and Diego Meller Comments

The comments are noted. Please see Master Response 1 for a general discussion regarding opinions and preferences expressed on the Project or the alternatives analyzed.

While we appreciate the commenter's suggestion of a new alternative to be analyzed in the EIR, this alternative is substantially similar in nature to the alternatives analyzed and is comprised of components of those alternatives, including Alternative 3 and Alternative 4. To the extent that the EIR already evaluates a reasonable range of alternatives, the

EIR need not study additional alternatives suggested by members of the public. (*See, e.g., South of Market Community Action Network v. City and County of San Francisco* (2019) 33 Cal.App.5th 321, 345.)

301. Raj Venkatesan Comments

From: **Raj Venkatesan** <ravenkat@gmail.com>
Date: Mon, Oct 20, 2025 at 1:05 PM
Subject: Comments " Mill Valley Middle School Renovation Plan
To: jarroyo@mvschools.org <jarroyo@mvschools.org>

Hi,

Renovating the middle school on its current site would negatively impact students/staff who would be housed on site in temporary classrooms during construction, and would be subject to excess odors, noise, dust, and possible toxic emissions if soil is disturbed. It is also a poor choice for the long term. By renovating the school without fully addressing the liquefaction and future sea-level rise issues, the district will very likely need to complete future costly repairs as conditions change. As a taxpayer, I find this to be fiscally short-sighted and a poor use of bond funds. The current renovation plan also fails to address a foreseeable (and preventable) risk of students being injured or worse if there is a major earthquake and the school buildings have not been seismically retrofitted to address liquefaction risks. I hope the district re-thinks its plan and selects an option that protects our significant financial investment and the long-term safety of middle school students/staff (both present and future).

Thanks,

-Raj

Responses to Raj Venkatesan Comments

The comments are noted. Please see Master Response 1.

As clarified in the Final EIR, Alternative 5 would not renovate either the existing building or foundations to meet current building code seismic requirements. The potential for seismic hazards would remain low in part due to the protections afforded under the legal framework applicable to the original construction. The Mill Valley Middle School campus was built in 1972 under the Field Act, one of California's strongest and most successful school safety laws. The Field Act requires all public school buildings to be designed by licensed architects and structural engineers, reviewed and approved by the Division of the State Architect (DSA), and inspected during construction to verify compliance with rigorous seismic standards. Since its adoption in 1933, no Field Act–compliant school building has collapsed or caused student injury in an earthquake.

To the extent there are any existing seismic hazards, CEQA generally does not require an analysis of the impact of existing environmental conditions on a proposed project. (*California Building Industry Association v. Bay Area Air Quality Management District* (2015) 62 Cal.4th 369, 377 [holding that agencies subject to CEQA are generally not required to analyze the impact of existing environmental conditions on a project's future users or residents].) To the extent there are existing seismic hazards at the site, such hazards are considered existing conditions of the site and are not project impacts requiring analysis or consideration under CEQA. In some cases, CEQA may require additional analysis where a project risks exacerbating environmental hazards or conditions that exist. (*East Sacramento Partnerships for a Livable City v. City of Sacramento* (2016) 5 Cal.App.5th 281, 296.) As discussed above however, the alternative would not exacerbate any existing conditions and therefore CEQA does not require any additional analysis of the impacts of sea level rise on the Project. (*Id*. at 296-97.)

With respect to the seismic safety of the Interim Campus at the MVMS site, the proposed foundation design has been reviewed by the California Geological Survey on behalf of the State Architect and determined to be appropriate to address seismic hazards including settlement and liquefaction[20].

[20] California Department of Conservation, California Geological Survey, Letter to Elizabeth Kaufman, Superintendent, Mill Valley School District, November 12, 2025, *Second Engineering Geology and Seismology Review for Mill Valley Middle School - Proposed Interim Campus. 425 Sycamore Street, Mill Valley, CA*. CGS Application No. 01-CGS6942.

302. Andrew Antkowiak Comments

From: **Andrew** <andrew2098@gmail.com>
Date: Mon, Oct 20, 2025 at 12:53 PM
Subject: Draft Mill Valley Middle School EIR Comment
To: <ekaufman@mvschools.org>, <jarroyo@mvschools.org>
Cc: <cboc@mvschools.org>, <ptacouncil@mvschools.org>

Via Email To: Elizabeth Kaufman, Superintendent
ekaufman@mvschools.org
Julio Arroyo, Director of Maintenance and Operations
jarroyo@mvschools.org
Mill Valley School District
411 Sycamore Avenue
Mill Valley, CA 9494

COMMENT ON THE DRAFT MILL VALLEY MIDDLE SCHOOL ENVIRONMENTAL IMPACT REPORT

I believe that the current draft EIR does not properly evaluate the available, feasible alternatives and should be withdrawn, redone and recirculated.

The new revised Draft EIR should be done after completion of all soil testing, the Preliminary Endangerment Analysis and after finalizing the mitigation analysis and securing the DTSC approval. It should include full analysis of alternatives that do not involve disturbing former landfill site. It should include: (i) converting Edna Maguire to a middle school and redistributing current students; (ii) the same, with a smaller Edna elementary school at the Terra Marin site.

I believe that the safety of our children is a main priority when choosing an option. Building the extension (reconstruction) at the current Mill Valley Middle School (MVMS) site, on top of the landfill, and in the area prone to flooding, is a dangerous option. The current MVMS site is contaminated with heavy metals (lead), emits methane that causes lung cancer, and is prone to flooding. Not properly remediated, the old landfill area when flooded, will be even more dangerous. Disturbing the contaminated site with new construction will create new/more problems unless the ground is remediated, which is cost prohibitive. I believe that only the options to build the Middle School on a safe site should be considered (not on a former landfill) . The Edna McGuire Elementary School is located on a safe site and could be a good and more cost-effective alternative to build the Middle School over there.

Sincerely,

Andrew Antkowiak, PE

andrew2098@gmail.com

Responses to Andrew Antkowiak Comments

The comments are noted. Please see Master Response 1 regarding the commenter's preferred alternative.

Hazards associated with the landfill, geologic conditions, and flooding are addressed in the EIR. Please see Master Response 7 regarding the preparation of a PEA and subsequent DTSC review, and the incorporation of relevant requirements regarding such review within the mitigation measures.

303. KK Sample Comments

From: **KK Sample** <kkcsample@gmail.com>
Date: Mon, Oct 20, 2025 at 12:22 PM
Subject: Draft EIR Comment
To: <rkaufmam@mvschools.org>, jarroyo@mvschools.org <jarroyo@mvschools.org>
Cc: <cboc@mvschools.org>, ptacouncil@mvschools.org <ptacouncil@mvschools.org>

Hello,

I'm a Mill Valley native — born and raised here. I attended Park School, served as student body president at MVMS, and later graduated from Tam High. I truly love this community and our schools.

I'm reaching out to share my concerns about safety — particularly related to traffic and emergency preparedness. I commute twice daily from Throckmorton Ave near Old Mill, and my children currently attend Edna. Even with the existing 377 students, traffic has become extremely congested.

Lomita Street, for example, is a single-lane road and already struggles with flow. Adding significant additional traffic would create serious safety risks for children walking or biking to school, as well as for emergency access.

I've attached photos to help illustrate the current situation. I hope this perspective helps highlight the need for thoughtful consideration around community safety and infrastructure before any further expansion.


CAUTION
(The light is green but grid locked)
the red light is for left turn.

Warmly,

KK Sample

Mill Valley Resident & Parent

Responses to KK Sample Comments

Please see Master Response 3. Traffic congestion associated with the Edna Maguire school is noted. Traffic congestion is no longer a CEQA potentially significant impact, but may be considered by the School Board in its project approval deliberations. Emergency access impacts are also addressed in Section 3.10 (Transportation) of the EIR as well as in Master Response 3.

304. Susan Flint Comments

From: **Susan Flint** <skflint@gmail.com>
Date: Mon, Oct 20, 2025 at 12:04 PM
Subject: EIR Comments
To: <jarroyo@mvschools.org>

Hi Julio,

Please consider my comments for the Draft EIR. I vote for the renovation of the existing MVMS main building and gymnasium and I hope Dr. Kaufman and the MVSD Trustees will choose this option.

This keeps the location of MVMS the same and it seems to be the most centrally located to the five elementary schools in the MVSD. It also maintains an optimal distance from Tam High School where most of the MVMS students go on to high school.

I also would like to see that the interim classrooms are placed on the MVMS site as well. That way the 6-8th grades remain together. There are programs at MVMS such as WEB that the 6th and 8th graders need to be in the same locations. It would be sad to see WEB go away if the 6th and 8th graders are split up. Even if it's only for a few years.

The site has been deemed safe by the appropriate agencies and this is the option with the least disruptions to students, staff, the neighborhood and parents.

This is my last year as a parent in the district. I have been a parent here for fourteen years this year. I was told when my son (who graduated from Tam High in June) was a 6th grader that MVMS was going to be renovated and my current 8th grader would probably be in a new or renovated school. Sadly that is not to be for my 8th grade daughter. I do hope that the process stays on track and MVMS gets renovated for those kids that are currently in elementary school.

Disclaimer - I am making these statements as a parent in the district and not on behalf of Kiddo! or PTA Council of which I am a member of both boards.

Lastly, I want to send out a huge thank you to the Trustees as well as Dr. Kaufman and you. This has not been easy and I appreciate all the hard work that's going into this project. Let's get it done!

Kind regards,

Susan Flint

Response to Susan Flint Comments

Please see Master Response 1.

305. Sarah Lovitt Comments

From: **Sarah Lovitt** <sarahelovitt@gmail.com>
Date: Mon, Oct 20, 2025 at 11:19 AM
Subject: MVMS Modernization
To: <ekaufman@mvschools.org>, <jarroyo@mvschools.org>
Cc: <cboc@mvschools.org>, <ptacouncil@mvschools.org>

Good afternoon,

As a Mill Valley taxpayer, MVMS Alum, and mother of a soon-to-be 6th grader, I am concerned about the health and safety of students and teachers given the site's documented contamination.

I support exploring the Edna Maguire site as a safer and more cost-effective alternative.

Kindest regards,

Sarah

Response to Sarah Lovitt Comments

Please see Master Response 1.

306. Greg Jenkins Comments

From: **Greg Jenkins** <gregomite@gmail.com>
Date: Mon, Oct 20, 2025 at 11:13 AM
Subject: Draft EIR Comment
To: <ekaufman@mvschools.org>, <jarroyo@mvschools.org>
Cc: <cboc@mvschools.org>, <ptacouncil@mvschools.org>

Dear Board Members,

As a parent of **twin fifth graders** who will soon attend Mill Valley Middle School, I'm asking the District to pause any plans to rebuild—or place temporary classrooms—at the current site until a **complete and transparent environmental and feasibility review** is finished.

The soil testing done so far was **incomplete** and already revealed **toxins and methane above safety levels**. The **DTSC** has requested more sampling, and methane sensors are being added to existing buildings—clear signs that major safety questions remain. Moving forward before the **Preliminary Endangerment Assessment** is finalized and approved would be premature and potentially unsafe for students and staff.

The **Draft EIR** also relies on **outdated enrollment data** and provides only minimal review of renovation options. It must be **withdrawn and recirculated** with complete, current information so the community can meaningfully evaluate safer and more sustainable alternatives.

Financially, this plan no longer makes sense. The project's estimated **$130 million price tag** continues to climb each year, yet it still doesn't solve long-term flooding, seismic, or sea-level rise risks—issues that could require even more taxpayer funding in the near future.

Our students deserve **a safe, modern school built for the future—not an expensive short-term fix**.

Sincerely,
Greg Jenkins
MVSD Parent & Community Member

Response to Greg Jenkins Comments

Please see Master Response 7 regarding the preparation of a PEA and subsequent DTSC review, and the incorporation of relevant requirements regarding such review within the mitigation measures.

With respect to issues relating to the enrollment and data assumptions for purposes of the EIR's analysis, see Response to Comment #9 in the Responses to Mill Valley Modernization Mess Comments (#187), above.

307. Eric and Sterling Somers Comments

Eric S. Somers
35 Lois Court
Mill Valley, CA 94941
eric@somers1.com

November 4, 2019

Superintendent Elizabeth Kaufman
ekaufman@millvalleyschools.org

Operations Director Julio Arroyo
jarroyo@mvschools.org

Mill Valley School District
411 Sycamore Avenue
Mill Valley, CA 94941

Re: Mill Valley Middle School Modernization

Dear Superintendent Kaufman and Director Arroyo:

My wife Stirling and I have lived in the Scott Valley neighborhood of Mill Valley for the last 24 years. Our property borders the Edna Maguire parking lot and our gate goes through to the school parking lot and playground. Our two children are now young adults and both attended Edna Maguire and Tam and one attended Mill Valley Middle School ("MVMS"). I also served on the Edna Maguire Bond Oversight Committee regarding the Edna modernization project and Stirling served on the Edna PTA for many years.

We strongly support the conclusion of Superintendent Elizabeth Kaufman and the Draft Environmental Impact Report ("DEIR") that the Lomita site should not be considered for permanent or temporary use by middle school students. We also agree with the recommendations and conclusions in the letter from the Scott Valley Homeowner's Association, a copy of which is attached. The primary reasons for our view are well stated in the DEIR. We agree with the conclusion that the best option for permanent and interim housing of middle school students is the current Sycamore location for the following reasons:

1. Location: The current middle school site is centrally located in Mill Valley and has far better car, bike and walking access. The Lomita site is in a one way in and out location in the far north eastern corner of Mill Valley. A move to the Lomita site would negatively impact traffic, safety and the environment in and around Mill Valley.

2. Number of students: Increasing the number of students at the Lomita campus by nearly 3x would be detrimental to the elementary school students, the middle school students and the surrounding community. Edna currently has 435 students while the middle school has 765 students. Combining them would total over 1200 students. When staff is added to those numbers the site simply cannot adequately handle such large numbers. The Lomita site is about 4 acres in size compared to the 18.5 acre Sycamore site. Combining that number of students on such a small site simply makes no economic or environmental sense. In addition, combining students that range in age from pre-school to 8th grade in such a small physical site raises safety and other

concerns that need not be addressed when the community has a much larger centrally located property to house such a diverse student body.

3. Cost: It appears that the cost of moving students and construction at the Lomita site are higher than that of using the existing Sycamore site. This makes no sense given the other (traffic, environmental, safety) disadvantages of the Lomita site and the limited funds available to the district for this project.

4. Equity: Finally, the Sycamore site is not immediately adjacent to residential housing. The Lomita site is surrounded by residential housing. This is a four year project that would have a significant impact on the surrounding residential neighborhoods. Further, the residential community surrounding Edna had to deal with the Edna modernization project and the issues surrounding a large building project including traffic, noise, toxic dust and all of the other impacts as recently as 2014. To impose another substantial four year construction project on the same neighborhood is simply not right.

Thank you for your consideration of our points and positions.

Yours very truly,

Eric and Stirling Somers

Responses to Eric and Sterling Somers Comments

Traffic emergency access and safety are addressed in Master Response 3. Cost and equity issues are not subject to CEQA review. The Sommers also attached the Scott Valley Homeowners Association comment letter, which is Comment 192, above, and responded to therein.

308. Ward Pendarvis Comments

From: **Ward Pendarvis** <wardpen@gmail.com>
Date: Mon, Oct 20, 2025 at 2:10 PM
Subject: EIR Public Comment
To: <jarroyo@mvschools.org>

To the MV School Board - I am a parent of a current Edna Maguire kindergarten student who also lives in the Scott Valley/Alto neighborhood. I would like to express my support for renovating the existing middle school facilities with temporary facilities located at the same site ("renovation" option). I would like to express my opposition to constructing a new middle school facility on the Edna Maquire campus location ("relocation" option).

The project needs to get underway quickly to avoid ballooning costs. The renovation option is most cost effective, safe, centrally located and able to proceed immediately with little risk of delay or other substantial disruption.

The relocation option would displace elementary students from a fantastic school community in the district's best and newest current facility which is only 10 years old. The Edna site is not large enough to house both schools based on state guidance on land acreage requirements and I do not believe the elementary school and middle school being collocated is safe for either age group. Further the local roads and neighborhood cannot handle an increase of ~1000 people per day. The Native American burial ground issue which has the potential to seriously delay the project is perhaps the biggest risk to the project moving forward. The relocation option is also likely to face a legal threat from the neighborhood which is likely to be at least somewhat successful given the previous settlement terms emanating from the previous Edna construction project.

I appreciate the difficult decision the board must make and know it will make the best decision possible. Thank you for your hard work on behalf of the students of Mill Valley.

Ward Pendarvis

Edward O. Pendarvis
6 Albert Ln
Mill Valley, CA 94941

Responses to Ward Pendarvis Comments

The comments are noted. Please see master Responses 1 and 3.

309. Jess Pluskowski Comments

From: **Jessica Pluskowski** <jpluskowski@gmail.com>
Date: Mon, Oct 20, 2025 at 2:08 PM
Subject: MVMS Site Feedback
To: <ekaufman@mvschools.org>, <jarroyo@mvschools.org>
Cc: <cboc@mvschools.org>, <ptacouncil@mvschools.org>
Dear School Board,
I am writing to express my strong belief that you owe it to our entire community to reconsider the Terra Marin/Edna Maguire campus for the Middle School.

Very simply, you do not know what you will find during construction at the existing site. Asking our students to be in portable classrooms right next to a loud (and potentially toxic) site isn't putting their well-being at the forefront. At best, this will be disruptive and at worst, dangerous. You have likely moved your offices for that reason as well - those optics aren't great.

Frankly, the board has seemed to give undo weight to the Edna community. This is a small subset of your community. I don't know if that's because you have board members from that neighborhood but it's been very concerning throughout the whole process. This is going to be disruptive no matter where you build and everyone will be inconvenienced. Please consider ALL your students.
Thank you,

Jess Pluskowski

Responses to Jess Pluskowski Comments

Please see Master Response 1.

310. Dayna Mullins Comments

From: **Dayna** <daynamullins@gmail.com>
Date: Mon, Oct 20, 2025 at 5:46 PM
Subject: Concerns Regarding the MVMS Modernization Project
To: <jarroyo@mvschools.org>, Elizabeth Kaufman <ekaufman@mvschools.org>, Sharon Nakatani <snakatani@mvschools.org>, <nkatz@mvschools.org>, <eabdoli@mvschools.org>, Michele Crncich Hodge <mcrncichhodge@mvschools.org>, <yyoo@mvschools.org>

Dear Julio and Members of the Mill Valley School District Board,

I am a parent of two daughters in MVSD (grades 5 and 7) and a Mill Valley native, born and raised in this community. As a commercial real estate professional, I am highly familiar with development processes and the complexities of projects requiring environmental mitigation.

Over the past few years, I have closely followed the MVMS Modernization Project. I have attended numerous school board meetings, spoken publicly, and met with Sharon Nakatani and Michele Hodge in July 2024 to discuss potential approaches. At that time, my primary focus was encouraging the Board to consider housing grades 6–8 offsite during reconstruction. I supported rebuilding MVMS on its current site only if the Board could clearly define and manage the mitigation requirements and associated costs.

More than a year later, it appears we are no closer to identifying a viable plan. The Draft EIR evaluates a plan that the Board has since discarded as financially infeasible and, in its current form, is inadequate for assessing the newly proposed options. After reviewing the EIR, I share the concerns outlined here: https://www.mvmsmodernizationmess.com/inadequate-mitigation-1-1.

Under one of the current proposals, and assuming the schedule holds, all current fifth graders — including my daughter — will spend their entire middle school experience in temporary classrooms adjacent to an active construction site. This would mean years of learning amid constant noise, dust, limited outdoor space, and potential safety and environmental risks — all in even closer proximity to the sewage facility. The additional traffic and heavy construction activity would further compromise safety and quality of life for students and families. Given the nearly $20 million cost of this temporary setup, it should only be pursued if no better alternative exists.

I align with many of the concerns raised by the “Concerned Mill Valley Parents” group and their comprehensive EIR response. It is disappointing, though not surprising, that

the initial redevelopment scope has proven economically infeasible. Now that this is clear, the Board should pause and reevaluate all options to ensure the $194 million in bond funds are used to deliver a long-term, future-ready solution. This reevaluation must account for current and projected enrollment across the District, anticipated sea-level rise at the existing MVMS site, and known environmental hazards that—while mitigable—will require a significant portion of the project budget.

I am also concerned that, while the Board is deeply committed, it may lack the specialized expertise required to oversee a project of this scale and complexity. I genuinely appreciate the Board's dedication and the significant time and effort each member has invested. This process has proven far more intricate than many could have anticipated when stepping into public service, and it requires a level of specialized planning and coordination beyond what is typically expected of a volunteer board. Planning a development on a site as challenging as MVMS requires careful sequencing, coordination among multiple government agencies, and deep technical understanding—none of which have yet yielded a feasible plan, despite the $4.1 million spent in 2024 and what I assume is a comparable amount spent year-to-date in 2025 on soft costs and legal fees. Without experienced oversight and a full grasp of the process required to evaluate and execute viable alternatives, we risk falling short of the best possible outcome for our students and community.

Projected timelines have also been consistently unrealistic, including the current plan to begin construction in June 2026 and complete by Fall 2028. Even with a full permit set today, that schedule would be nearly impossible given the number of required agency reviews and approvals.

The Mill Valley community voted generously to fund these critical improvements, particularly to address the failing infrastructure at MVMS. We must ensure this investment results in a true modernization — not a costly "lipstick on a pig" project limited to surface upgrades and landscaping when the building, campus, and our children deserve so much more. Likewise, allocating nearly $20 million toward temporary on-site housing is neither fiscally responsible nor educationally sound.

I urge the Board to reconsider **repurposing the Edna Maguire site as the new MVMS campus.** This approach would eliminate the need for temporary facilities, allow current MVMS students to remain on their existing campus during construction, and distribute Edna students across the district's four other elementary schools.

To properly evaluate this alternative, I respectfully request that the Board:

1. **Publish updated district enrollment data** to ensure decisions reflect accurate, current, and projected student populations.

2. **Review the prior traffic study** prepared for the Edna renovation, which indicated that the surrounding neighborhood could accommodate the projected traffic volumes for the current MVMS student population. This analysis should also consider that many middle school students, unlike elementary students, walk or bike to school.

3. **Initiate preparation of a new Draft EIR** that evaluates the actual, currently proposed options rather than relying on outdated or infeasible plans.

This additional analysis is essential to ensure that the chosen plan is both educationally and fiscally responsible for the long term.

No solution will satisfy everyone, but this alternative represents a thoughtful, sustainable path forward for our students and the Mill Valley community.

Thank you for your time, consideration, and continued commitment to this important decision.

Sincerely,
Dayna Desmond
Mill Valley Resident and Parent

Responses to Dayna Mullins Comments

The commenter's preferences and opinions regarding the Project and the alternatives are noted. Please see Master Response 1.

This comment also incorporates by reference and reiterates various claims based on the Mill Valley Modernization Mess Comments (#187). See the Responses to Comments for this letter for a detailed discussion of each of the topics raised.

As discussed in greater detail in Response to Comment #9 for the Mill Valey Modernization Mess Comments, the Draft EIR's analysis of the alternatives was properly based on the 2021 Facility Master Plan data, which was the best data available when the Notice of Preparation was issued on June 14, 2024. The decision to base the Draft EIR's analysis of the alternatives on this data is based on substantial evidence in the record and is proper, and there is no requirement under CEQA that would require the District to update its analysis to reflect the enrollment data suggested by the commenter. In addition, the District received a new demographic study in February

2025, which contained projections that were generally similar to the 2021 Facility Master Plan, thereby indirectly supporting the original use of the 2021 Master Facilities Plan's enrollment projects.

With respect to issues relating to traffic, see Master Response 3.

With respect to the request to initiate preparation of a new Draft EIR because either the Project and/or the alternatives are infeasible, please see Master Response 5.

311. Carla Hackett Comments

From: **Carla Hackett** <hackettcarlalouise@gmail.com>
Date: Mon, Oct 20, 2025 at 10:01 PM
Subject: Strong Support for the Renovation of the Existing Middle School on Sycamore Avenue
To: jarroyo@mvschools.org <jarroyo@mvschools.org>

Dear Mr. Arroyo,

I am writing regarding the Mill Valley Middle School Reconstruction Project *(SCH# 2024060669)*. I strongly support the **Renovation of the Existing Middle School on Sycamore Avenue** as the best and most responsible path forward.

I've carefully reviewed all of the information several times - the DEIR, PEA, and recent board discussions. The data makes it clear that the site can safely be modernised.

As a resident of Shell Road and a parent to a TK student at Edna Maguire. I see firsthand the daily congestion and challenges in this area. My daughter has benefited greatly from the local school community and the West America Tae Kwon Do aftercare programe. She's become more confident and connected thanks to their support. Strong, local schools like this are vital to our community and our future generation.

Renovation of the Existing Middle School on Sycamore Avenue is the most environmentally responsible, fiscally prudent, and community-supported solution. It maintains the school's central location, minimizes disruption, and reflects Mill Valley's values, protecting both our environment and our children's education.

I urge the District to move forward with the **Renovation of the Existing Middle School on Sycamore Avenue** without delay.

Warm regards,

Carla Louise Hackett

72 Shell Road, Mill Valley

Responses to Carla Hackett Comments

Please see Master Responses 1 and 2.

312. MVMS Modernization Mess Petition

Petition: Demand a Safer, Smarter Mill Valley Middle School Plan: EIR Comment Letter

To: Elizabeth Kaufman, Superintendent (ekaufman@mvschools.org) Julio Arroyo, Director of Maintenance and Operations (jarroyo@mvschools.org) The Mill Valley School District Board of Trustees (LetterstotheBoardofTrustees@mvschools.org)

We, the undersigned parents, staff, and taxpayers, urge the Board to review our detailed public comment letter on the Draft Environmental Impact Report ("Draft EIR") for the Mill Valley Middle School Modernization Project. Along with many in the community, we remain concerned about the project's environmental, fiscal, and safety impacts. The Draft EIR lacks an accurate project description or meaningful analysis of the renovation option, offering only 3½ pages—one of which is a photo. This EIR must be withdrawn, revised, and recirculated because it relies on incomplete hazard data, outdated enrollment figures, and misleading project details—undermining meaningful public input.
Please read our letter and cited sources, keeping an open mind to alternatives that are safer, less disruptive, more cost-effective, and more durable for decades to come.
https://www.mvmsmodernizationmess.com/
Executive Summary
The original rebuild project analyzed in the Draft EIR is no longer financially feasible due to soil toxicity. Instead of conducting an early feasibility study, the District spent over three years and roughly $6 million planning a project that was never realistic given required mitigation.
Why the Draft EIR Is Flawed
Insufficient analysis: only 3½ pages on the renovation option, including a picture.
• Incomplete safety review: moves forward without a completed Preliminary Endangerment Analysis (PEA), violating CEQA and limiting public oversight.
"Methane gas is recorded at 5% in VP-9. Methane between 5%–15% is explosive… DTSC is requiring the Draft PEA to add methane sensors to all existing buildings immediately."
Safety cannot be confirmed until DTSC approves full sampling and mitigation.
• Costly yet incomplete renovation: fails to resolve flooding, contamination, and seismic concerns.
• Unclear seismic feasibility: Upgrading foundations to modern standards would require soil mixing and removal—the same costs that sank the rebuild. No plan or budget exists.
• Rejects safer, feasible alternatives, including relocating to the Edna Maguire site, based on outdated data.

Why Edna Maguire Deserves Analysis
 Safer: outside liquefaction and flood zones, free from contamination, and no temporary classrooms next to a toxic site.
 Less disruptive: no mid-year relocations or construction during school.
 More sustainable: not threatened by sea-level rise or aging 1970s foundations.
 Traffic is manageable: approved for 679 students; MVMS has 697—comparable. Current 377 Edna students could be redistributed among four elementary schools.
 Comparable acreage: MVMS ≈ 8–10 acres; Edna ≈ 9 acres. Similar student density to other sites.
 Smarter taxpayer spending: The District plans to spend $130 million (~$1,406 per sq ft), with 29% ($38 million) going to soil removal and temporary housing instead of lasting improvements. There's no funded plan for sea-level rise that could "island" the school and cause further contamination—risking future funding requests.

Bottom line: The timeline and spending plan are unrealistic and fiscally unsound. Mill Valley deserves a safer, smarter, more sustainable solution.

We therefore request that the District:
 Withdraw and recirculate the Draft EIR with an accurate project description and full analysis of alternatives.
 Complete the PEA and secure DTSC approval before CEQA review proceeds.
 Obtain approvals from the Division of the State Architect and California Geological Survey regarding seismic retrofit needs before final decisions.
 Evaluate financial feasibility first, then limit CEQA to feasible options.
 Provide full project-level analysis of viable alternatives, including structural and geotechnical

Petition: Demand a Safer, Smarter Mill Valley Middle School Plan: EIR Comment Letter

data.
👉 Pause bond spending and construction contracts until a revised EIR is completed.
👉 Suspend non-essential Measure G spending at elementary schools until facility needs are clear.
👉 Publish a realistic timeline that avoids moving children mid-year.
👉 Expand alternatives to include:
(i) converting Edna Maguire to a middle school and redistributing current students;
(ii) the same, with a smaller Edna elementary school at the Terra Marin site.
👉 Use current enrollment data, realistic traffic studies, and planned street improvements when evaluating Edna options.
Mill Valley's children deserve a school that is safe, sustainable, and fiscally responsible—built on sound data, not outdated assumptions.
School Board Meeting: Oct 16 at 6:00 p.m. – MVMS Library
Comment Deadline: Oct 17 at 5:00 p.m.

Petition: Demand a Safer, Smarter Mill Valley Middle School Plan: EIR Comment Letter

Signed by 143 people:

Name Zip code
Mill Valley Modernization
Mess
94941
Tracy Urquhart 94941
Boriana Fackler 94941
Kristen Heschong 94941
Dave Williams 94941
Peter Imlay 94941
Miranda OConnell 94941
Daniele Teixeira 94941
Ellen Voecker 94941
Lynnette Teti 94941
Benjamin Salter 94941
Cindy Merrick 94941
Geoff Knopp 94941
michelle passero 94941
Ira Chin 94941
Janet Lawson 94941
Stephen Oldknow 94941
Susan Dawson 94941
George Caliendo 94941
Ben Holbrook 94941
Chris Bailey 94941
Neal Dessouky 94941
Dan Boley 94941
Melissa Jenkins 94941
Sarah Wilson 94941
Gaby Dominguez 94941
Sabrina Sinton 94941
Julie Everett 94941
Diane Lewis 94941
Kasia Meller 94941
Antonia Sivyer 94941
Erica Austin 94941
Amy Cruz 94941
Allie Garcia 94941
Molly Branch 94941
Heather Barrett 94941
Brian Esquivel 94941
Gina Gardner 94941
Annie Stephenson 94941
Justine Clifford 94941
Alison White 94941
Dionne Trowse 94941
Ila Marchetta 94941
Amy Spencer 94941
Sandra Possing 95472
Raj Venkatesan 94941
Chris Esquivel 95472
Ben Fackler 94941
Kathryn Esquivel 94941
Christopher Crowe 94941
Name Zip code
Wesley Caddell 94941
Diana Jansone 94941
gillian popper 94941
Alison Shemyakin 94941

Dan Sinton 94941
Carlos Esquivel 94941
Sara Halterman 94941-
2602

Jessica Esquivel 94941
Jess Pluskowski 94941

Maryam Sadeghi 94941
Andrew Dawson 94941
Anita Forbes 94941
Mikhail Shemyakin 94941
Sarah Holmsen 94941
Mary-Alice Cárdenas 94941
Kimberly Buss 94941
Kristin Miller 94941
Ben Chittenden 94941
Boris Pluskowski 94941
KAWA CHIU 94941
Dayna Desmond 94941
Krishna Kosuri 94941
Anna Hodus 94941
Mythili Devineni 94941
Alice Stolte 94941
Brian Stolte 94941
Alexi Cashen 94941
Vanessa Kirkpatrick 94941
Aoife O'Donovan 94941
Diego Meller 94941
Kristen Flore 94941
Catherine St Clair 94941
Danielle Miyasato 94941
Pooja Sherchan 94941
Ish Spencer 94941
Erika Edelson 94941
Rachel Holbrook 94941
F B 94941
Gavin Bailey 94941
Ulrika Svanfeldt 94941
Boone Spooner 94941
Cara Douglass 94941
Lori Spooner 94941
Daniel Baker 94941
Lisa Memmel 94941
Thomas Gore 94941
Catherine Gore 94941
Dean Dessouky 20017
Caroline Dessouky 22901
Holly Herren 94941
Thomas Zukoski 94941
Shannon Coleman 94941
Aimee D 94941
Lindsay Salter 94941
Jonathan Longabaugh 94941
Amaris Vicari 94941
Ryan Vicari 94941
Julia Gottlieb 94941
Melissa Cohen 94941
Bridget Harris 94118
Fernanda Repsold 94941
Ali Meyer 94025
Danny O'Shea 94941
Vanessa Erickson 94941
Eric Edelson 94941
Christian Buss 94941
Josh Woolley 94941
Frank Young 94941
Julianne Fables 94941
Benjamín Berkowitz 94941
Juliette Hart 94941
Tom Hockin 94941
Becky Buzogany 94941
Clara Daniels 94941
Tim Daniels 94941
Andrew Antkowiak 94941
Margaret Antkowiak 94941
Name Zip code
Heather Barrett 94941
Quinci KElly 94941
Sarah Vreede 94941
Shawn Borisoff 94941
Sarah Lovitt 94941
Peter Prato 94941
Jen Conway 94941
Jerome Rossen 94941-3717
Sandra Bragar 94941
Danielle Roselin 94941
Sandy Whitcombe 94941
Nonie Ronald 84108
Gregory Off 94941
Jennifer Kurzman 94941
Kathy Harris 94941
Phil Kurzman 94941

Responses to MVMS Modernization Mess Petition

Please see the responses to MVMS Modernization Mess comments, Comment 187, above.

313. Ben Fackler Comments

From: **Ben Fackler** <bfackler@gmail.com>
Date: Mon, Oct 20, 2025 at 5:01 PM
Subject: EIR Comment
To: <jarroyo@mvschools.org>

Dear Dr. Kaufman and Mr. Arroyo:

I am a Mill Valley resident taxpayer and a district parent.

The draft EIR raises several significant concerns both from an investment and a health & safety perspective. The draft report demands extensive mitigation measures to reduce the significant seismic risk on the site, which apparently led the Board to discard its plans notwithstanding significant expenditures of time and taxpayer dollars. Yet now the plan seems to be to engineer around required seismic standards, by doing "just enough" to avoid trigger the upgrades to address known seismic issues. We voted in favor of the bonds for MVMS's modernization to provide for a safe and beautiful facility for our students and teachers. How is this attempted workaround of seismic standards not putting current and future students and faculty at risk?

The draft EIR also describes the challenges posed by rising sea level and advocates for strategies to counter this hazard. To be clear, this is not just about rising sea level, but also rising water tables, which will impact the toxins in the soil below the school. The new preferred plan is silent on this.

I fail to see how spending $95 million for a cosmetic upgrade that does not address key risks with the site could be the preferred solution, and would appreciate your response in this regard.

I support the public comment letter by MVMS Modernization Mess, an association of concerned parents dated October 9, 2025:
https://static1.squarespace.com/static/668c4a0dd9348c745c994ccf/t/68e89208509fd46aeb6e13c2/1760072200598/vFinal+-+EIR+Comments+-+MVMS+Modernization+Mess+%2810-09-25%29.pdf

Thank you for your time.

Sincerely,
Ben Fackler

Responses to Ben Fackler Comments

The commenter's preferences and opinions regarding the Project and the alternatives are noted. Please see Master Response 1.

This comment also incorporates by reference and reiterates various claims based on the Mill Valley Modernization Mess Comments (#187). See the Responses to Comments for this letter for a detailed discussion of each of the topics raised.

314. Sarah Beard Comments

From: <beardsarahb@gmail.com>
Date: Mon, Oct 20, 2025 at 4:59 PM
Subject: MV middle school community opinion
To: <jarroyo@mvschools.org>, <ekaufman@mvschools.org>, <LetterstotheBoardofTrustees@mvschools.org>, <BreakingNews@kron4.com>, <cboc@mvschools.org>, <communications@mvschools.org>, <kbrenner@marinij.com>

To whom it may concern,

Re: the middle school project.

I have spoken many times at various school board meetings and listened to the ongoing conversations about the extensive delay in starting the rebuild of the MV middle school project.

Every voice is an equal voice in this community regardless of opinion. That said, a large majority of voices agree that the middle school should be built at the current location on Sycamore Avenue. It is a central location easily accessible to all students.

It's disheartening but not surprising - there is an alternate petition already circulating on moveon.org for the MVMS mess opposing group that wants the current middle school site moved to beside Edna Maguire on Lomita Ave.

That would shift it from a current centrally located 14 acre site to an outlying 4 acre site increasing the hazards to egress/ingress points. How can a site that is built for an elementary age size of students in a ln already condensed neighborhood be considered for this?

To imagine possibly disturbing a coastal Miwok Native American burial site is shocking. To imagine combining a middle school to share pace (that was NOT built for shared space) is WILD? To increase egress/ingress points and stressing the transportation infrastructure in the Edna neighborhood is dangerous.

To disregarded entire school community and displace every single student, uprooting them to place them at various other schools across the city is mind boggling. To very likely let go of teaching staff at Edna maguire because class sizes would need to be increased at the remaining elementary schools in town and also be unable to build additional classes at each elementary school absorbing displaced Edna students is unacceptable.

To allow a small group of concerned citizens who continue to fear monger the many

“what ifs” and “worst cases scenarios” re: earthquakes, flood, tsunamis, etc. is giving into unavoidable risks that everyone already has even in their own homes and town. It is not the sole reason that this project needs to be tied up any further.

Our children’s education is a priority. Any more time that is wasted on other sites (after more than 12 alternative sites were explored/considered and eliminated) is a waste of time and energy. MV residents passed measure G for the intended purpose to improve the MV middle school. It was passed with the desire to improve it AT the current location. It was not expected to be held up in lawsuits, red tape and to bend the knee to a small group insisting on converting all or part of the Edna Maguire school / neighborhood into a middle school temporarily or permanently.

Please do what the EIR / CEQA / Safety commissions and school board thinks is within the best interest of the MV community.

Please move forward with the middle school project at its current site.

Sincerley,

Sarah Beard

Responses to Sarah Beard Comments

The commenter’s preferences and opinions regarding the Project and the alternatives are noted. Please see Master Response 1.

315. Siddharth Vanchinathan/Unblock MVMS Modernization Petition

Unblock MVMS Modernization - Vote for Alt 1!

To: MVSD School Board
Petition to the Mill Valley School District Board of Trustees: Vote for Alternative 1 – Renovation of the Existing MVMS Campus
To:
Elizabeth Kaufman, Superintendent
(ekaufman@mvschools.org)
Julio Arroyo, Director of Maintenance and Operations
(jarroyo@mvschools.org)
The Mill Valley School District Board of Trustees (LetterstotheBoardofTrustees@mvschools.org)

Date: October 17th 2025
We, the undersigned community members, parents, staff, and taxpayers, strongly urge the Board to select Alternative 1: Renovation of the Existing MVMS Campus (Sycamore Drive) for the Mill Valley Middle School Modernization Project. Please accept this as our collective public comment on the draft EIR. Alternative 1 is the most feasible and prudent choice for achieving Measure G objectives, allowing the project to begin immediately.

Why Alternative 1: Renovation at Sycamore Drive
Environmentally and Educationally Superior
The Draft EIR identifies Alternative 1 as the Environmentally Superior Alternative with reduced construction impacts. It maintains a single, central campus for all grades 6-8, vital for building community and providing cohesive transition before high school. The centrally-located campus ensures equity of access and better traffic flow. At 18.5 acres—the largest available site—it meets Department of Education guidelines and enables future enrollment growth. This option minimizes traffic and neighborhood impacts, protects TK and elementary schools, and allows West America Taekwondo and Aftercare to remain.
Confirmed Safety with Rigorous Mitigation
Extensive testing, including the Preliminary Endangerment Assessment and EIR, confirms safe renovation meeting 21st-century standards despite the site's history as a former landfill. The plan addresses seismic concerns, modernizes outdated systems, and raises site grades to mitigate sea-level rise. New methane monitors show "no exceedances detected." Comprehensive air quality measures include HEPA purifiers and MERV-13 filters in all classrooms. Soil vapor testing found no health hazard for students; staff face acceptable lifetime cancer risk (four in one million) within DTSC's range. Rigorous mitigation includes capping disturbed areas and installing Vapor Intrusion Mitigation Systems. Only construction noise and temporary odors are unavoidable; all other impacts are mitigable.
Fiscally Prudent
Renovation aligns with the $95 million hard cost budget, ensuring completion without additional debt. Each year of delay costs approximately $8 million in escalation.

Why Not Alternative 2: Edna Maguire/Terra Marin Site
Inadequate Size and Educational Concerns
The site is too small for co-locating elementary and middle schools (guidelines recommend 15-25 acres). Insufficient acreage means cramped conditions, forced sharing of fields and cafeterias, and safety concerns mixing elementary and middle school students.
Severe Traffic and Safety Hazards
This location would create dangerous congestion on narrow residential streets, threatening young students during drop-off/pick-up and potentially delaying emergency services. The non-central location increases traffic citywide and burdens families with additional commuting.
Fiscal Irresponsibility
Relocation requires expensive, unbudgeted bus transportation not covered by Measure G, draining

the general fund and threatening essential programs like Transitional Kindergarten.
Cultural and Community Disruption
The site overlays a culturally significant Native American burial ground, with discoveries as recent as 2013. Construction would disrupt this sacred space, displace community services like West America Taekwondo and Aftercare, and waste the 2013 campus rebuild investment.
Call to Action
Alternative 1 is the environmentally sound, financially responsible, and educationally superior path. We urge the Board to uphold the Measure G commitment and vote decisively in December 2025 to certify the Final EIR and approve Alternative 1: Renovation of the Existing MVMS Campus, ensuring this crucial project begins in June 2026.

The Real Issue: We Cannot Afford More Delay
Alternative 2 proponents want to restart the entire planning process—cramming a middle school onto the undersized Edna Maguire site, creating dangerous traffic congestion on narrow residential streets, mixing elementary and middle school students inappropriately, and disrupting a culturally significant Native American burial ground. They would waste the community's recent investment (Edna was completely rebuilt in 2013) while ignoring that their alternative requires expensive, unfunded busing that drains money from essential programs like Transitional Kindergarten.

Every Year of Delay Costs Us $8 Million
Here's what opponents won't tell you: the District loses approximately $8 million annually in escalation costs every time this project is delayed. That's $8 million that could modernize classrooms, upgrade safety systems, and improve facilities—instead evaporating into construction cost inflation. We already have an approved plan. We have the budget. We have completed the environmental review identifying Alternative 1 as environmentally superior. The Draft EIR is certified. Every day spent debating alternatives that haven't undergone proper environmental review, traffic studies, or community input is another day our children remain in outdated, unsafe facilities.

Our Children Cannot Wait
Middle schoolers today are learning in buildings with outdated electrical systems, inadequate HVAC, and accessibility issues. They deserve the modern, safe, climate-resilient campus that Alternative 1 delivers—and they deserve it now, not after years of additional studies, debates, and legal challenges that Alternative 2 would inevitably trigger. The science supports renovation. The budget supports it. The environmental analysis supports it. The only thing preventing progress is endless second-guessing by those who would rather restart than rebuild.

Our Ask
Join us in urging the Board to vote for Alternative 1 in December 2025. Sign our petition. Attend Board meetings. Tell the Board that progress matters. Our children have waited long enough. We have done the work. We have the answers. Now we need action. Alternative 1 ensures construction begins in June 2026—giving our students the facility they deserve by December 2028. Every alternative path adds years of delay and millions in wasted costs.
The time for debate has passed. The time for building is now.

Signed by 699 people:
Name Zip code
Sid Vanchinathan 94941
Emily Buskirk 94941
Brooke Goodman 94941
Julie Bremer 94941
Trish Stevens 94941
Erin Frazier 94901
Aiperi Alybaeva 94941
Chris Chorak 94941
Aja Smart 94941
Shana Stewart 94941
Cameron Stewart 94941
Scott Ellison 94941
Kate Ellison 94941
Gabrielle Powell 94941
Kimberly Hobson 94941
molly coomber 94941
Ashlee Kathrein 94941
Paul Grana 94941
Claire Koshland 94941
Stephanie Shyu 94941
erika shern 94941
Chantal Carlon 94941
Brooke Simmons 94941
Michel Narganes 94941
Courtney Gaiman 94941
Sarah Toomey 94941
Dusty Kenney 94941
Brittany Harrison 94941
Brad Tewksbury 94941
Tina Marie Humphrey 94942
Erica Desai 94941
Eric Desai 94941
Sabrina Ames 94941
Julie Baldocchi 94941
Christy Atkisson 94941
Lily Cialowicz 94941
Amelia Myers 94941
Hans Reich 94941
Patricia Hubbard 94941
Bruce Botsford 94941
Jake Hobson 94941
Anne Deucher 94941
Name Zip code
Karolina Gachowska 94941
Marc Lester 94941
Bess Friday 94941
Naomi Goodman 94941
Kelly Ellis 94941
Callyn H 94941
Tim Bishop 94941
Marina Mascorro 94941
Amy Callinan 94941
James Meiners 94941
Daniel Stevens 94941
Julia Kazul 94941
Sue Weiss 94941
Quinn Sawyer 94941
Sarah Guber 94941
Susan Lindstrom 94941
Iliana Harasimowicz 94941
Milica Basta 94941
Megan Root 94941
Lauren Budesheim 94941
Maggie Spillane 94941
Casey Jillson 94941
Charles Bush 94941
Hilary Hyde 94941
Matt Small 94941
Catherine Nottage 94941
Dorsi Bonner 94941
Cameron Weissensee 94941-5205
Mark Simmons 94941
Lisetta Quick 94941
Sydney Hubbard 94941
Sarah Beard 94941
Christina Inglis-Arkell 94941
Vanessa Welstead 94941
Meredith Brown 94941
Michele Little 94941
Edward Rusky 94941
Kathleen Callinan 94941
Mai Klaassen 94941
Fiona Allan 94941
Jennee DeVore 94941
Name Zip code
Kate R 94941
Cathy Eick 94941
Kara Merski 94941
Tara Ordonez 94941
Monica Castro 94941
Andrew Vallely 94941
Zarina Kazbekova 94941
Lionel Selzer 94941
Jean Maher 94941
Natasha Kindergan 94941
Sarah Bauer 94941
Amy McCrea 94941
Nawzaneen Zahir 94116
Alexa Shively 94941
Mark Lutzker 94941
Kristina Chinongoza 94941
Mai Le 94941
Matt Barkovich 94941
Chris Hubbard 94941
Michael Bauer 94941
Asma Nakhuda 94941
Rachel Griswold 94941

Sarah Mehtar 94941
clark stephens 94941
David Parkinson 94941
Rebecca Stone 94941
Mary-Ann Milford 94941
Bianca Sills 94941
Allison Sage 94941
Heather Sawyer 94941
Jenna Friel 94941
Smyrna Sanchez 94941
Marissa Ruppel 94941
Shonquis Moreno 94941
Mary Mckenzie 94941
Katie Stromsborg 94941
Oshik Maoz-Metzl 94941
Heather Breslow 94941
Connie Tiret 94941
KIEN TRAN 94941
Liz Richmond 94941
Hanna Persky 94941
Jessica Izquierdo 94941
Alicia Contreras Ruiz 94941
Bethany Parrett 94941
Tucker Richmond 94941
Ranga Chinongoza 94941
Amy Ward Thompson 94941
Jamie Dwyer 94941
Toby Costello 94941
Alexandria Stuart 94941
Krisanna Spotswood 94941
Jessica Menzies 94941
Mary Beth Todd 94941
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Responses to Unlock MVMS Modernization- Vote For Alt 1! Petition

The petition/commenter's preferences and opinions regarding the Project and the alternatives are noted. Please see Master Response 1.

316. Jackson Beard Comments

From: **Jackson Beard** <dinosaur575@icloud.com>
Date: Mon, Oct 20, 2025 at 4:44 PM
Subject: Middle school student opinion
To: <jarroyo@mvschools.org>, <ekaufman@mvschools.org>, <LetterstotheBoardofTrustees@mvschools.org>, <BreakingNews@kron4.com>, <cboc@mvschools.org>, <communications@mvschools.org>, <kbrenner@marinij.com>

Hi my name is Jackson Beard and I have spoken at the school board meetings many times.

I have a couple words to say with you. This is what I said in person at the last school board meeting I was able to speak at.

I do NOT think that you should delay this construction for I am in 5th grade. I am okay with my 5th grade friends and I through 1 or 2 years in portable buildings. And if you are worried about the smell don't be for there will be entirely new AC's, vents and filters.

Now, I have a couple questions for you. Where will we all do outside activities like recess and PE while construction is going on? We could go on friends field and play tag, dodge ball, soccer, you name it! Now will we have to ask someone not to sue so we can at least play on it?

Next, how far away are portable classes? I think they should not be far apart because I've heard that people walk super far between some of their classes. If classes are on opposite ends of the school sometimes my sister in 6th grade has been late a few times walking as fast as he can with a really heavy backpack. The backpacks are so much heavier than my back pack for 5th grade and she has only binders, a school iPad and a small reading book in it.

Lastly, can you all try to ask for enough hangers for backpacks inside or hanging covered outside for backpacks? I know a lot of backpacks get stepped on especially during PE or have gotten sticky, so dirty, dirt, wet or covered by ants all over the area.

So please hear my voice. Don't let the bully's take my future.

Jackson Beard

5th grader
Edna Maguire

Responses to Jackson Beard Comments

The commenter's preferences and opinions regarding the Project and the alternatives are noted. Please see Master Response 1.

Please see responses to Oral Comments by Jackson Beard, following the written comments and responses.

317. Candice Curtis Comments

From: **Candice Curtis** <candice@weissenseemgmt.com>
Date: Mon, Oct 20, 2025 at 4:43 PM
Subject: Concern Regarding Potential Relocation of Middle School to Lomita
To: <jarroyo@mvschools.org>

Dear Members of the Mill Valley School Board,
I am writing as a longtime resident and homeowner in Mill Valley to express my deep concern regarding any consideration of relocating the existing middle school to the Lomita site.
Relocating the middle school to Lomita would place an unsustainable burden on our community. The projected increase in student population—approximately two and a half times larger than at present—would create significant traffic congestion in an area that is already heavily impacted. The Lomita site lacks sufficient parking, has limited sidewalks due to partial county jurisdiction, and would not realistically accommodate a bus system without excessive cost. Moreover, the site does not provide adequate acreage to support a middle school of this size.
Furthermore, we would expect that any consideration of the Lomita site would require extensive infrastructure improvements, including bioretention ponds to address flooding risks, major environmental, traffic, and pollution impact reports, and the installation of sidewalks on all streets currently without them. With so many students now using e-bikes, there would also need to be a robust plan to mitigate the safety and traffic issues this creates. These requirements alone would greatly increase the costs of the project and raise serious questions about its feasibility.
By contrast, the current middle school site is central, established, and better equipped to serve the broader Mill Valley community. While challenges exist there, such as those relating to the sewer plant, these can be addressed and mitigated without displacing students and creating disproportionate burdens on neighborhoods such as Alto Sutton, Scott Valley, and the Edna Maguire community. A relocation would disrupt these communities and worsen traffic patterns for Mill Valley overall.
The middle school belongs in the middle of Mill Valley, where it has always been. Please understand that our neighborhood feels strongly about this issue, and we are not alone. If you have not yet heard widespread dissent from the community, it is only because many residents were not aware this proposal was under consideration. Rest assured, we are prepared to stand firmly against a relocation to Lomita.
Thank you for your time and attention to this matter.
--
Candice Curtis
55 Avon Ave, Mill Valley

Responses to Candice Curtis Comments

Please see Master Responses 1, 3, and 4.

318. Hector Garcia Comments

From: **Hector Garcia** <animogarcia123@gmail.com>
Date: Mon, Oct 20, 2025 at 4:41 PM
Subject: Draft EIR comment
To: <ekaufman@mvschools.org>, <jarroyo@mvschools.org>

Hello,

I am a father of three kids in Mill Valley who is in favor of using Edna as the location for the middle school.

In my experience as a contractor, unknown site conditions such as contaminated soil conditions at the existing middle school site will inevitably drive up the cost of construction and delay the project completion. I am worried about construction costs ballooning to where we are forced to request more money shortly after the parcel tax comes up.

I urge decision makers to to think of the safety of the kids first. It is NOT the only option to keep an existing contaminated site that is inherently more risky and requiring lifetime monitoring & supervision.

I would feel better sending my children to a place that is more safe even if that meant a change in my own community. Please help support moving the project forward on a safer site. We can add more dedicated bike/walking paths throughout the city, come up with a strong traffic plan and analyze ways to reduce impact to the community that would not favor putting our kids permanently on the riskier site.

Tks,
Hector

Responses to Hector Garcia Comments

The commenter's preferences and opinions regarding the Project and the alternatives are noted. Please see Master Response 1.

319. Carl Weissensee Comments

From: Carl Weissensee <carl@weissenseemgmt.com>
Date: Mon, Oct 20, 2025 at 4:40 PM
Subject: EIR
To: <jarroyo@mvschools.org>

Dear Mr. Arroyo,

At this point, I find myself beyond frustrated — I am angry, deeply disappointed, and frankly dismayed that the Terra Marin site is still being discussed as a possible location for a new Mill Valley Middle School. The fact that this proposal continues to linger, despite its glaring flaws, speaks to an astonishing level of bureaucratic paralysis and disregard for both safety and common sense.

Let me be clear: the Terra Marin site is unsafe, impractical, and entirely unsuitable for a school. The congestion in that area is already untenable. County roads there have no sidewalks, making it hazardous for pedestrians, especially children. The intersection at the Chevron station is notoriously dangerous. And yet, somehow, there are still conversations about funneling more daily traffic through that intersection? It's outrageous.

The neighborhood already accommodates the Islamic Center, which we fully support and appreciate as part of our community — but anyone who drives through that area knows it already generates significant traffic. To even contemplate adding hundreds of daily car trips from parents, staff, and school buses on top of that is reckless. It would endanger residents, students, and drivers alike.

Beyond the safety hazards, this proposal is not environmentally sound and is absolutely not in the best educational interest of our children. There are better, safer, more responsible options. The continued failure to recognize that — after so many months of public feedback and expert concern — is indefensible.

I've heard members of the community being urged to "stay civil," and while I agree that civility has its place, it is difficult to remain calm when those holding up progress have not extended the same courtesy. At some point, someone has to speak plainly: this process has become an embarrassment. The lack of decisive leadership and the willingness to even entertain such a deeply flawed idea borders on negligence.

I urge you, in the strongest possible terms, to abandon any consideration of the Terra Marin site once and for all. Listen to the residents who live with these dangers

every day. Listen to the parents who expect better for their children. It is time for the Board to act with both integrity and competence — two qualities that have been sorely missing in this process so far.

Sincerely,

Carl Weissensee

10 Willow St, Mill Valley

Responses to Carl Weissensee Comments

Please see Master Responses 1 and 3.

320. Chris Peeler Comments

From: **Chris Peeler** <chris.peeler@gmail.com>
Date: Mon, Oct 20, 2025 at 4:36 PM
Subject: MVMS
To: <jarroyo@mvschools.org>

Dear Julio, Trustees and Dr. Kaufman,

As a Mill Valley resident, a parent of an Edna Maguire student, and a neighbor of the school, I want to express serious concern about the proposal to relocate Mill Valley Middle School to 70 Lomita Drive.

The small fire at Edna Maguire this afternoon underscored exactly what many of us have been warning about: our neighborhood's access and evacuation routes are dangerously limited. When the fire broke out, traffic immediately backed up along Lomita Drive as parents and neighbors tried to reach the school. Fire crews responded quickly and professionally, but it was clear how easily our narrow residential loop could become gridlocked in a true emergency.

If a middle school were added next door—with another 700 to 950 students (plus staff and parents), the danger multiplies dramatically. In a wildfire, earthquake, or other crisis, thousands of people could be trying to move through the same small street all at once. Emergency vehicles could be delayed, families trapped, and seconds that matter most could be lost.

Even on an ordinary school day, the congestion from two large campuses operating side by side would make access unsafe for children walking or biking to Edna Maguire. The District's own environmental report confirms that traffic would exceed capacity on Lomita Drive under this proposal.

We all want the best for our students, but safety has to come first. Renovating the existing Mill Valley Middle School campus is a safer, more responsible, and more centrally located solution. It's accessible by major roads, built to handle emergency response, and avoids creating new risks for families and first responders.

I urge the Board to remove 70 Lomita Drive from consideration as a permanent middle school site.

Thank you for your time and your continued service to our schools and community.

Sincerely,

Chris Peeler

Responses to Chris Peeler Comments

Please see Master Responses 1 and 3.

321. Bria Ruben Comments

From: Bria <bria1226@gmail.com>
Date: Mon, Oct 20, 2025 at 4:35 PM
Subject: MVMS Public comment in favor of current location.
To: Julio Arroyo <jarroyo@mvschools.org>

Hi Julio,
Please note my support of keeping MVMS at the current location for both construction and rebuild/remodel. I am a Mill Valley resident who has a 2nd and 5th grader. I am in favor of having the current Mill Valley Middle School campus renovated onsite in its current location and having the portable classrooms for the 6-8th graders at the current site during construction.

Reasons why the site at Lomita (both Edna and former Terra Marin sites) should not be considered for the new middle school and/or the temporary portable locations:

• Voter trust and the Measure G pledge. When Measure G passed in 2022, the community voted to fund modernization at the current site. Most of those who voted yes do not currently have children in our schools, yet they supported the measure because they believe strong schools lift the entire town. Changing course would erode that trust and jeopardize future support for districtwide improvement. Many of those people are not aware of the pivot to move sites, because they do not actively have children in the school system.

• Educational strength and campus size. The Sycamore campus offers 18.5 acres—ample room to house grades 6–8 on a single site with fields, arts space and room for future expansion. Keeping the middle school together on a central campus supports academic and social growth for both middle schoolers and elementary students.

• Safety, accessibility and neighborhood impact. The existing site is centrally located, walkable and served by established infrastructure. By contrast, the Lomita Drive alternative would place the full middle-school student body on a four-acre parcel, force sharing of spaces with Edna Maguire, and add heavy traffic to narrow residential streets. Sycamore is not only the best site for the permanent campus but also the best location to host portable classrooms during construction.

• Protecting West America. Renovating in place allows West America Taekwondo and Aftercare to remain where they are. I cannot stress enough the value of these programs to the Edna Maguire community.

• Environmental soundness and professional oversight. Testing shows that with proper mitigation, this site is safe for students and staff. Let's trust the scientists,

engineers and and health professionals to do their jobs and meet California's strict building and safety codes.

• Fiscal prudence and timely action. Each year of delay adds millions of dollars in construction escalation—money that should go to classrooms and facilities, not indecision. The district has the plan, the budget and the data to proceed. Don't let the threat of litigation deter you from what's best for our students and our community.
In sum, renovation at the Sycamore site is the rational, responsible and educationally sound choice. It honors what voters approved, supports what students need and fulfills what our community promised. I respectfully ask that you certify the Final EIR and move forward so our middle-school students can learn in safe, modern facilities without unnecessary delay.

Thank you for your time, service and thoughtful consideration.

Sincerely,
Bria Ruben

Responses to Bria Ruben Comments

The commenter's preferences and opinions regarding the Project and the alternatives are noted. Please see Master Response 1.

322. Sarah Rayburn Comments

From: **Sarah Wagner Rayburn** <sarah@marinhome.team>
Date: Mon, Oct 20, 2025 at 4:28 PM
Subject: Mill Valley Middle School EIR Available for Public Comment
To: jarroyo@mvschools.org <jarroyo@mvschools.org>

Hello -

I have two kids, that go to Edna Maguire in first and fourth grades, that will be going to the middle school in the near future. I am completely in favor of having the current Mill Valley Middle School campus renovated onsite in its current location and having the portable classrooms for the 6-8th graders at the current site during construction.

Reasons why the site at Lomita (both Edna and former Terra Marin sites) should not be considered for the new middle school and/or the temporary portable locations:

• **Voter trust and the Measure G pledge.** When Measure G passed in 2022, the community voted to fund modernization at the current site. Most of those who voted yes do not currently have children in our schools, yet they supported the measure because they believe strong schools lift the entire town. Changing course would erode that trust and jeopardize future support for districtwide improvement. Many of those people are not aware of the pivot to move sites, because they do not actively have children in the school system.

• **Educational strength and campus size.** The Sycamore campus offers 18.5 acres—ample room to house grades 6–8 on a single site with fields, arts space and room for future expansion. Keeping the middle school together on a central campus supports academic and social growth for both middle schoolers and elementary students.

• **Safety, accessibility and neighborhood impact.** The existing site is centrally located, walkable and served by established infrastructure. By contrast, the Lomita Drive alternative would place the full middle-school student body on a four-acre parcel, force sharing of spaces with Edna Maguire, and add heavy traffic to narrow residential streets. Sycamore is not only the best site for the permanent campus but also the best location to host portable classrooms during construction.

• **Protecting West America.** Renovating in place allows West America Taekwondo and Aftercare to remain where they are. I cannot stress enough the value of these programs to the Edna Maguire community.

• **Environmental soundness and professional oversight.** Testing shows that with proper mitigation, this site is safe for students and staff. Let's trust the scientists, engineers and and health professionals to do their jobs and meet California's strict building and safety codes.

• **Fiscal prudence and timely action.** Each year of delay adds millions of dollars in construction escalation—money that should go to classrooms and facilities, not indecision. The district has the plan, the budget and the data to proceed. Don't let the threat of litigation deter you from what's best for our students and our community.

In sum, renovation at the Sycamore site is the rational, responsible and educationally sound choice. It honors what voters approved, supports what students need and fulfills what our community promised. I respectfully ask that you certify the Final EIR and move forward so our middle-school students can learn in safe, modern facilities without unnecessary delay.

Thank you for your time, service and thoughtful consideration.
Sincerely,
Sarah Rayburn
Mill Valley, California

Response to Sarah Rayburn Comments

The commenter's preferences and opinions regarding the Project and the alternatives are noted. Please see Master Response 1.

323. Anita Sparks Comments

From: **Anita Castro Sparks** <anitacastro99@hotmail.com>
Date: Mon, Oct 20, 2025 at 4:23 PM
Subject: EIR comment
To: Julio Arroyo <jarroyo@mvschools.org>

Dear Julio Arroyo,
I am writing to show my support to for alternative One (modernization and portables at Sycamore site)
Unless EIR, PEA or state regulators give us legitimate reasons why these events can't happen on the current site it is time to get this project off the ground. I feel confident the school district has done enough to understand our options and moving the middle school anywhere else seems like a poor choice for out community.

I truly hope within the next 3 years our students can be enjoying a beautifully remodeled middle school.

Sincerely,
Anita Sparks
Parent of a 4th grader at Edna Maguire and 7th grader at MVMS

Response to Anita Sparks Comments

The commenter's preferences and opinions regarding the Project and the alternatives are noted. Please see Master Response 1.

324. Dusty Kenney Comments

From: **Dusty Kenney** <dustykenney@gmail.com>
Date: Mon, Oct 20, 2025 at 4:09 PM
Subject: MVMS Modernization
To: <jarroyo@mvschools.org>

Dear Trustees,
I am writing as a parent of a 2nd grader at Edna Maguire Elementary and a resident of the neighborhood directly surrounding the school. I care deeply about our community, our children's education, and the safety of the families who live here.

The proposal to relocate a 950-student middle school to 70 Lomita Drive, next door to Edna Maguire, poses serious risks to both our neighborhood and the students at Edna. It would replace a centrally located, easily accessible middle school with a large facility squeezed into a small residential area that already carries the burden of hosting Mill Valley's largest elementary school.

The District's own Draft Environmental Impact Report (EIR) outlines several unavoidable impacts:

- **Traffic and Parking:** Lomita Drive and the surrounding residential streets would be pushed beyond capacity, creating long backups, blocked driveways, and unsafe conditions for children walking or biking to school. Existing streets already strain under daily Edna Maguire traffic; adding hundreds more students and staff would triple that load and cause significant congestion throughout the day.
- **Noise and Air Quality:** Two to three years of demolition and construction would expose Edna Maguire's youngest learners, an especially sensitive age group, to constant dust, noise, and reduced air quality. Permanent operations would add a lasting increase in noise to nearby homes.
- **Emergency Safety:** In a wildfire or other disaster, more than a thousand parents could flood into our small residential loop to reach their children while families and residents attempt to evacuate. The resulting gridlock could block emergency vehicles and trap people in harm's way.
- **Cultural and Environmental Risks:** The site risks disturbing a significant Native American cultural area, an issue not present at the current middle school site, and any discovery during excavation could delay or halt construction indefinitely.

Beyond these impacts, the proposed site is significantly smaller than the current middle school campus. It lacks the space, access roads, and infrastructure to safely accommodate the needs of a large middle school.

There is, however, a better solution. Renovating the **existing Mill Valley Middle School campus** is a practical, cost-effective, and safer option. It keeps the school in a central location, served by major roads and public infrastructure designed for higher traffic volumes. This approach avoids creating new problems for one community while

solving another's, and it preserves the integrity of the Edna Maguire neighborhood and its elementary school.

Our neighborhood already shoulders the brunt of traffic, parking, and noise from Edna Maguire. Adding a second, even larger school here would make our streets unsafe, our air unhealthy, and our emergency response dangerously compromised.

Please protect the safety, livability, and well-being of both Edna Maguire families and the surrounding neighborhood by removing 70 Lomita Drive from consideration as a permanent middle school site.

Thank you for your time and service to our community.

Sincerely,
Dusty Kenney

Responses to Dusty Kenney Comments

The commenter's preferences and opinions regarding the Project and the alternatives are noted. Please see Master Response 1.

325. Boriana Fackler Comments

From: **Boriana Fackler** <bafackler@gmail.com>
Date: Mon, Oct 20, 2025 at 4:03 PM
Subject: Draft EIR
To: Elizabeth Kaufman <ekaufman@mvschools.org>, Julio Arroyo <jarroyo@mvschools.org>
Cc: <cboc@mvschools.org>, <ptacouncil@mvschools.org>

Dear Dr. Kaufman and Mr. Arroyo:

I am a Mill Valley resident and a district parent.

The draft EIR that we are invited to comment on is mostly dedicated to a now-discarded plan to rebuild the middle school. It offers scant details on the preferred option to remodel the existing MVMS building while keeping the students on site. However, it gives us a detailed description of the site that raises significant concerns. These must be analyzed and addressed as pertaining to the proposed remodel, as well as compared to alternatives, before the project could move forward.

I am particularly concerned with two significant hazards on the current site - the seismic risk and the threat posed by sea level rise.

The draft EIR demands extensive mitigation measures to reduce the significant seismic risk on the site. These are described for a newly constructed building. In contrast, there is no plan for seismic retrofit of the current obsolete building. In fact, the preferred alternative is designed to stay under the 50% threshold in order to avoid seismic retrofit. How is this approach in the best interest of our students and teachers?

The draft EIR also describes the challenges posed by rising sea level and advocates for strategies to counter this hazard. The preferred alternative does not incorporate such plans. How can we expect to have a school for the future without addressing this ever-increasing threat? It's been often stated that all of Mill Valley is at risk of flooding - this is correct in general but nowhere more pertinent than on the MVMS site, which is surrounded by marsh and on the edge of the bay.

Finally, I'd like to point to the financial shortcomings of the proposed remodel. You propose spending over $95 million of taxpayer money on a remodel that will result in a modern facade and new HVAC system but will not address the seismic and sea level rise challenges of the site? When should we expect the next bond to fund these necessary measures?

I support the public comment letter by MVMS Modernization Mess, an association of concerned parents dated October 9, 2025:

https://static1.squarespace.com/static/668c4a0dd9348c745c994ccf/t/68e89208509fd46aeb6e13c2/1760072200598/vFinal+-+EIR+Comments+-+MVMS+Modernization+Mess+%2810-09-25%29.pdf

Thank you for the opportunity to comment on the draft EIR.

Sincerely,
Boriana Fackler

Responses to Boriana Fackler Comments

The commenter's concerns regarding existing seismic and sea level-rise hazards on the Sycamore Avenue site are noted.

As clarified in the Final EIR, Alternative 5 would not renovate either the existing building or foundations to meet current building code seismic requirements. Even so, the potential for seismic hazards would remain low in part due to the protections afforded under the legal framework applicable to the original construction.

Even so, the potential for seismic hazards would remain low in part due in part to the protections afforded under the legal framework applicable to the original construction.

The Field Act was introduced in 1933 along with other laws that banned the construction of unreinforced masonry buildings, and required that earthquake forces be taken into account in structural design for public school buildings. The Field Act also established the Office of the State Architect (now Division of the State Architect or DSA) which developed design standards, quality control procedures, and required that schools be designed by registered architects and engineers. These professionals must submit their plans and specifications to the State Architect for review and approval prior to construction. The same professionals were also required by the Field Act to periodically inspect the construction while underway and verify that the actual work completed is in compliance with the approved drawings. Peer review and inspection requirements were also introduced as another quality control procedure.

The Mill Valley Middle School campus was built in 1972 under the Field Act, one of California's strongest and most successful school safety laws. The Field Act requires all public school buildings to be designed by licensed architects and structural engineers, reviewed and approved by the Division of the State Architect (DSA), and inspected during construction to verify compliance with rigorous seismic standards. Since its adoption in 1933, no Field Act–compliant school building has collapsed or caused student injury in an earthquake.

Under the California Administrative Code, state regulations establish a 50% replacement cost threshold when a district modernizes an existing school building. If modernization costs remain below 50% of the cost to completely rebuild the building, then the existing building is not required to be retro-fitted as part of a full building rehabilitation unless the work increases seismic or wind loads or alters the building's lateral-force-resisting system by more than 10%. This approach is common across California and allows districts to perform smaller scale modernizations while maintaining full compliance with DSA oversight.

If the District selects the renovation alternative identified in the EIR, the next step will be to meet with DSA during the design development phase to review and confirm that the planned improvements do not exceed the thresholds of cost, strength, or loading that will trigger a full building evaluation and rehabilitation. While DSA will not require a full seismic rehabilitation if the project remains below the thresholds mentioned above, they will review the construction documents to confirm that any new structural elements added or alterations to existing elements are designed to meet current codes and standards.

This alternative will use a percentage of that 10% with the addition of fire sprinklers which will add some "seismic weight" to the building, but will not require any rehabilitation pursuant to the California Administrative Code.

To the extent there are any existing seismic hazards, CEQA generally does not require an analysis of the impact of existing environmental conditions on a proposed project. (*California Building Industry Association v. Bay Area Air Quality Management District* (2015) 62 Cal.4th 369, 377 [holding that agencies subject to CEQA are generally not required to analyze the impact of existing environmental conditions on a project's future users or residents].) To the extent there are existing seismic hazards at the site, such hazards are considered existing conditions of the site and are not project impacts requiring analysis or consideration under CEQA. In some cases, CEQA may require additional analysis where a project risks exacerbating environmental hazards or conditions that exist. (*East Sacramento Partnerships for a Livable City v. City of Sacramento* (2016) 5 Cal.App.5th 281, 296.) As discussed above however, the alternative would not exacerbate any existing conditions and therefore CEQA does not require any additional analysis of the impacts of sea level rise on the Project. (*Id*. at 296-97.)

With respect to sea-level concerns, the Project is designed for the main building to be above the 60" sea-level rise level. Due to site limitations, the Project does not include

sea-level-rise retreat provisions. Alternatives located on Lomita Drive would be outside of sea-level rise hazard areas. With respect to sea-level concerns specifically, please see Responses to City of Mill Valley Comments related to sea-level rise (Agency Letter No. 3, comments 7-17).

This comment also incorporates by reference and reiterates various claims based on the Mill Valley Modernization Mess Comments (#187). See the Responses to Comments for this letter for a detailed discussion of each of the topics raised.

In addition, this comment raises a concern regarding various financing issues. Financial issues are not generally within the scope of CEQA and therefore no response is required.

326. Courtney Gaiman Comments

From: **Courtney Gaiman** <courtneygaiman@gmail.com>
Date: Mon, Oct 20, 2025 at 3:54 PM
Subject: Thank You AND EIR Comment
To: <jarroyo@mvschools.org>, Elizabeth Kaufman <ekaufman@mvschools.org>, <letterstotheboardoftrustees@mvschools.org>

Dear Julio,

I wanted to personally thank you (and your team). As you know, we had a bit of "excitement" at Edna Maguire today with a nearby vegetation fire. I heard that you and your team were very quick to respond and provide support. I truly appreciate your swift response and careful oversight of our school buildings and facilities. Please pass along a big 'thank you' to your whole team - I am not sure of the name of the Edna maintenance crew helper who helped Farmer David from the Garden at Edna to use fire extinguishers on the site before the fire department arrived.

For my final comments on the EIR Draft:

We had a vegetation fire nearby Edna today. I am so grateful that all of the students, staff and faculty were safe, and that our beloved school facility and surrounding grounds were unharmed.

I shudder to think if a bigger fire had occurred, and if Alto (our "shelter in place" meeting area) was jeopardized, how the outcome could have been different.

The power was out as a result of this brush fire, and as a result communications out of Edna Maguire and between buildings were compromised. Cell phone service is nearly non-existent in the Edna area. Alt 2 on the EIR would add hundreds more staff and students to this location tucked away in a bottle-necked neighborhood with limited egress. A wildfire could potentially devastate this area, and if necessary, a swift evacuation from the area could be nearly impossible.

Please proceed with renovating the existing middle school and utilizing temporary portables on site so that we can continue to send our kids to a central location that has much safer ingress and egress.



Thank you,

Courtney Gaiman
Mill Valley Resident
Edna Parent

Responses to Courtney Gaiman Comments

The commenter's preferences and opinions regarding the Project and the alternatives are noted. Please see Master Response 1.

Please see Master Response 3 regarding emergency response and access. Emergency response services and wildlife hazards are more generally discussed in the EIR in Section 3.7 (Hazards, Hazardous Materials and Wildfire) and in Chapter 5 (Alternatives).

327. Anna Lazzarini Comments

From: **Anna Lazzarini** <alazzarini@me.com>
Date: Mon, Oct 20, 2025 at 3:27 PM
Subject: Fwd: MVMS Renovation Project
To: <ekaufman@mvschools.org>

Dr. Kaufman,
We haven't met, but I am the retired MVMS principal. I retired in 2021 after 10 years as principal and 6 years as assistant principal. While I am no longer working there, I've been part of the MV community for 45 years and care deeply about the middle school and the school district. I know Chris Bailey because he lives in the same neighborhood where we lived. He has a couple of boys - I believe his oldest is still at the middle school - and maybe both are there at this time. He sent the email below to a large neighborhood group and some others whom I don't know. The vast majority do not have kids in MVSD - either because their kids are adults at this point and some that I know never had kids in MVSD.

If you read the bottom email from Chris Bailey, you will see that he was reaching out to all of us to sign his petition. I responded to the entire group giving my reasons why I wouldn't be signing the petition, hoping they could see the other side of the big question of updating on the same property or adding a middle school to the Edna property. While I was assistant principal and again as principal, we went through two different plans to rebuild the middle school - that never went anywhere due to the Edna rebuild needing the vast majority of that particular bond, and then again a few years later drawings and plans were done and that fizzled out. I remember saying to the superintendent, Paul Johnson, that we should be sure we could rebuild on the ms property if the building would be torn down, given it was built on the old dump. It certainly seems the answer is that it is too prohibitive to tear down and rebuild with everything that needs to be done to ensure the soil is safe, and an update/remodel is the best choice.

I thought this could be of interest to you. Good luck with the big decision. I'm hoping you can all move forward with the latest plan.

Kind regards,
Anna Lazzarini

Begin forwarded message:

From: Chris Bailey <chrisbailey007@gmail.com>
Subject: Re: MVMS Renovation Project
Date: October 15, 2025 at 4:37:52 PM PDT
To: Anna Lazzarini <alazzarini@me.com>

Cc: Natasha Boas <natashaboas@gmail.com>, Mitch Wortzman <mwortzman@yahoo.com>, Mallary Walker <rosaliemallary@gmail.com>, John Boas <john@6gear.com>, Jodi Korb <jodikorb@yahoo.com>, Mark Wagner <coachmwags.13@gmail.com>, Ivan Manchip <imanchip@yahoo.com>, Liz Williamson <liz@lizwilliamson.com>, Dominic Coleman <dominic_a_coleman@yahoo.com>, Bill Saunders <bnbsaunders@sbcglobal.net>, Gignilliat Bibby <bibby.gignilliat@gmail.com>, Betsy Saunders <betsyisaunders@gmail.com>, James Thomas <jimo13@comcast.net>, Fawn Bailey <fsbailey3@gmail.com>, Jules Greenberg <jules@julesgreenberg.com>, JW <jwalkerh@gmail.com>, Patricia Wynne <pwynne@pacbell.net>, Katharine Macchia <kmacchia@yahoo.com>, Steve Gensler <sgensler1@yahoo.com>, Steve Garibaldi <S_garibaldi@comcast.net>, Nick Roger <nroger1965@gmail.com>, Valerie Roger <nvroger@mac.com>, Wendy Anderson <wen22@me.com>, Garth Copenhaver <lodrosangbo@hotmail.com>, Barbara Chambers <barbara@chambersandchambers.com>, Taylor Lewis <taylor.lewis@tidelinemarinegroup.com>

Thanks Anna. Definitely respect your opinion and experience here and I obviously have different ones after a lot of detailed analysis. happy to engage with folks that want to dig into the why as they are laid out in this letter in detail.

https://www.mvmsmodernizationmess.com/

On Oct 15, 2025, at 3:03 PM, Anna Lazzarini <alazzarini@me.com> wrote:

Hi Chris,
I will not be signing the petition, and I want to explain why.

Having worked at MVMS, as a teacher, assistant principal, and principal for over 27 years - and having had three of my own children go through the middle school, as well as tens of thousands of students since it opened in 1972, I can assure you that no one has ever become ill from working or going to school in the MVMS building. We have always knowing it was built on the old MV dump - as is the MV Community Center, which was built in 2000-2001.

In my strong opinion, updating and remodeling the middle school at its current location is far better than trying to squeeze a middle school on a campus that is about half the size and having to share facilities such as fields and auditorium with an elementary school. Edna is the largest elementary school with over 425 kids and MVMS is not a small one with over 750 students. When I retired from MVMS 4 years ago, we had 90 staff members (teachers and other staff) that needed to be able to park. Edna has fewer teachers/staff, but I have not heard anyone talk about being able to add additional parking at Edna in addition to a proposed new middle school.

At one of the last board meetings, where they had the professionals there discussing the soil concerns, they also pointed out that there are things they can do and use now that weren't available in 1970 when they were building the original school building. Another consideration is the size of the actual land in acreage - my understanding is that Edna campus in total is 11 acres and the MVMS campus in total is 19 acres. Putting both an elementary and middle school on a smaller total acreage is not beneficial to either school.

It is also worth mentioning that the Lomita and Shell neighborhoods would be completely disrupted by having well over 1200 students (cars, bicycles, scooters etc) get to and from school each day. I have friends that live on Lomita and Shell and they are not happy about the prospect of dealing with all the additional traffic mornings and afternoons.

Lastly, I know the majority of teachers at both Edna and MVMS do not support building a new middle school on the other side of the Edna parking lot and basically sharing a campus and some of the facilities and parking - when the programs and bell needs are vastly different.

Kind regards,

Anna Lazzarini
Retired MVMS Principal

On Oct 14, 2025, at 1:22 PM, Chris Bailey <chrisbailey007@gmail.com> wrote:

Neighbors,

Please consider signing my MoveOn petition on the Measure G Middle School project I have devoted 4 yrs to understanding - feel free to reach out with questions. Board meeting is 10/16 and deadline for comments is 10/17.

https://sign.moveon.org/petitions/petition-demand-a-safer-smarter-mill-valley-middle-school-plan-eir-comment-letter?source=rawlink&utm_source=rawlink&share=80460ef6-9c18-49aa-8923-fe4cea73d375

Our groups detailed comments on the Draft EIR are at https://www.mvmsmodernizationmess.com/

Nextdoor back and forth here:

https://nextdoor.com/p/D4kKKcLMCXjS?utm_source=share&extras=NzgzMDI2Mw%3D%3D&ne_link_preview_links=&share_platform=10&utm_campaign=1760473322553&share_action_id=1bcef218-a0c2-4584-a087-339cc6923db2

Thanks,
Chris

Responses to Anna Lazzarini Comments

The comments included in the commenter's email thread are acknowledged. Please see Master Responses 1, 3, and 4.

328. Charles Zeigler Comments

From: **Charles Ziegler** <chaszieglер.33@gmail.com>
Date: Mon, Oct 20, 2025 at 3:33 PM
Subject: Mill Valley School District
To: jarroyo@mvschools.org <jarroyo@mvschools.org>

To MVSD,

MVSD is committed to modernizing its middle school facilities. Renovating the existing MVMS campus, is identified as the Environmentally Superior Alternative and also presents significant academic and programmatic advantages for middle school students. This option leverages the current site's advantageous size and central location, which is crucial for fostering a cohesive 6th through 8th grade community.

Maintaining a unified campus ensures that students from various elementary schools come together in a dedicated middle school environment, supporting their developmental and social needs before transitioning to high school. The renovation plan also maintains 12 classrooms per grade level and has the capacity to accommodate future enrollment increases.

Conversely, building a new middle school at the Edna Maguire/Terra Marin site, presents substantial challenges. The site's limited acreage is a significant concern for accommodating both elementary and middle school populations, potentially leading to cramped conditions and developmental and safety issues with shared spaces.

The co-location of elementary and middle school students is generally not considered ideal for their age-appropriate programmatic needs. This alternative also carries a high risk of disrupting a culturally significant Native American burial site and would inevitably exacerbate traffic congestion in an already impacted neighborhood, affecting accessibility for families from across the district.

For these reasons, please VOTE NO on locating the Mill Valley Middle School at 70 Lomita Drive.

Sincerely,

Charles Ziegler
102 Lomita Dr
Mill Valley, Ca 94941

Responses to Charles Ziegler Comments

The commenter's preferences and opinions regarding the Project and the alternatives are noted. Please see Master Response 1.

329. Richard Kelly Rayburn Comments

From: **Kelly Rayburn** <kelly.rayburn@gmail.com>
Date: Mon, Oct 20, 2025 at 3:30 PM
Subject: Mill Valley Middle School EIR Public Comment
To: <jarroyo@mvschools.org>

Mr. Arroyo:

I am submitting the attached comment for your review and consideration.

Sincerely,
Richard Kelly Rayburn

--
kelly.rayburn@gmail.com
www.kellyrayburn.com

October 20, 2025

Dear Dr. Kaufman, Mr. Arroyo and Members of the Board,

My name is Richard Rayburn. My wife, Sarah Rayburn, and I have a first-grader and a fourth-grader at Edna Maguire Elementary School. I write to urge you to approve the renovation and modernization of Mill Valley Middle School at its existing Sycamore Avenue site.

I offer my reasons below in support of this choice:

- **Voter trust and the Measure G pledge.** When Measure G passed in 2022, the community voted to fund modernization at the current site. Most of those who voted yes do not currently have children in our schools, yet they supported the measure because they believe strong schools lift the entire town. Changing course would erode that trust and jeopardize future support for districtwide improvement.
- **Educational strength and campus size.** The Sycamore campus offers 18.5 acres—ample room to house grades 6–8 on a single site with fields, arts space and room for future expansion. Keeping the middle school together on a central campus supports academic and social growth for both middle schoolers and elementary students.
- **Safety, accessibility and neighborhood impact.** The existing site is centrally located, walkable and served by established infrastructure. By contrast, the Lomita Drive alternative would place the full middle-school student body on a four-acre parcel, force sharing of spaces with Edna Maguire, and add heavy traffic to narrow residential streets. Sycamore is not only the best site for the permanent campus but also the best location to host portable classrooms during construction.
- **Protecting West America.** Renovating in place allows West America Taekwondo and Aftercare to remain where they are. I cannot stress enough the value of these programs to the Edna Maguire community.
- **Environmental soundness and professional oversight.** Testing shows that with proper mitigation, this site is safe for students and staff. Let's trust the scientists, engineers and and health professionals to do their jobs and meet California's strict building and safety codes.
- **Fiscal prudence and timely action.** Each year of delay adds millions of dollars in construction escalation—money that should go to classrooms and facilities, not indecision. The district has the plan, the budget and the data to proceed. Don't let the threat of litigation deter you from what's best for our students and our community.

In sum, renovation at the Sycamore site is the rational, responsible and educationally sound choice. It honors what voters approved, supports what students need and fulfills what our community promised. I respectfully ask that you certify the Final EIR and move forward so our middle-school students can learn in safe, modern facilities without unnecessary delay.

Thank you for your time, service and thoughtful consideration.

Sincerely,
Richard Kelly Rayburn
Mill Valley, California

Responses to Richard Kelly Rayburn Comments

Please see Master Responses 1, 2, and 4.

330. Paul Grana Comments

On Mon, Oct 20, 2025 at 3:23 PM Paul Grana <paul.grana@gmail.com> wrote:
To Whom it May Concern,

I would like to voice my support for the Mill Valley School District, the Mill Valley School Board, Dr. Kaufman and her staff. Specifically, the plans to renovate the Mill Valley Middle School, including the published EIR, are sound, responsible, and represent the best interest of our community and our children.

The approach recommended by Dr Kaufman balances the needs to control costs, improve our middle school in a timely manner, and care for the safety of our children. The current location of MVMS at 425 Sycamore Ave is the best long-term location for MVMS.

Writing this letter feels weird, as I don't have anything to push back on in the EIR. Rather, I'm writing this in response to the vocal few who are doing their best to kill the project under the auspices of "responsibility".

As the parent of a 10-year-old, I have lots of experience holding space for an argument where the other side is coming from emotion rather than from facts and intellectual consistency. Sadly, this is also what it's like to listen to the opponents of the plan. They want to re-open decisions that were made in 2023, and they shut down arguments of others because their position is based on "the safety of our children".

The fact is, our current leaders know what they are doing. We've hired professionals who know what they are doing. And the plan is following the laws of the State of California, perhaps the most difficult place in the world to build.

As my 10-year-old would say, "Let Dr Kaufman Cook."

Sincerely,
Paul Grana
Father to two children in the MV school system

--
Paul Grana
paul.grana@gmail.com

Responses to Paul Grana Comments

The commenter's preferences and opinions regarding the Project and the alternatives are noted. Please see Master Response 1.

331. Paige Martin Comments

From: Paige Martin <pmartinmv@gmail.com>
Date: Mon, Oct 20, 2025 at 2:44 PM
Subject: MVMS: Draft EIR Comments
To: <jarroyo@mvschools.org>

MV School District Board and Superintendent Dr. Kaufman,

The Mill Valley School District, the City of Mill Valley, local residents, and families with school-aged children all deserve a comprehensive, responsible, and forward-thinking plan for a Middle School that prioritizes student and staff health, safety, and environmental stewardship.

The current site under consideration — an EPA-designated Superfund site — is fundamentally inappropriate for a school. It is deeply concerning that the Draft Environmental Impact Report (DEIR) moved forward with the Full Build-Out option as the Proposed Project, and that the design process advanced so far on a site known to be contaminated. This decision reflects a significant lapse in judgment and a failure to uphold a duty of care to our students, educators, and community. Numerous prior studies have documented the site's hazardous history, including being a former burn site, and this information was readily available at the outset.

The DEIR appears to have been constructed to support a predetermined outcome, presenting the selected project favorably while minimizing or misrepresenting the viability of alternative sites. As a result, the study lacks the objectivity and rigor required. This skewed process has not only wasted valuable time and public funds but has also resulted in a proposal that is both environmentally irresponsible and fiscally infeasible.

Key considerations such as sea level rise and the site’s proximity to the sewer treatment facility were not given appropriate weight in the site selection process. These are fundamental factors in determining long-term safety and suitability and should have led to a broader and more realistic evaluation of other potential sites.

The alternatives were not assessed using accurate data. For example, the analysis did not factor in the actual enrollment figures from Terra Marin, despite that school previously operating successfully, and did not use realistic enrollment for all the other schools. The omissions call into question the integrity of the comparative analysis.

The approach to community engagement was flawed as public outreach efforts disproportionately focused on feedback from the Edna Maguire community, while concerns raised by other residents were dismissed or minimized. Board members visibly showed support for Edna community speakers while appearing to disregard comments from others. This has contributed to a sense of bias and exclusion that undermines trust in the process.

Arguments against alternative sites have leaned on fear-based narratives about earthquakes and fire risk. While all of Mill Valley faces geographic and infrastructural challenges, it's worth noting that the Edna neighborhood is relatively flat, features a grid street layout, and has direct access to Highway 101 — characteristics that make it among the safest areas in the city during emergencies.

A potential solution to mitigate traffic concerns could include housing only 7th and 8th graders at a middle school at the Terra Marin site, while integrating 6th graders into existing elementary schools. Options like this were not meaningfully explored in the DEIR.

Given these significant shortcomings, the District is urged to withdraw the current Draft Environmental Impact Report and prepare an unbiased draft. This new report must include a realistic project description and a thorough, objective analysis of all viable alternatives.

Paige Martin
35 Castle Rock Dr
Mill Valley CA 94941

Responses to Paige Martin Comments

The commenter's preferences and opinions regarding the Project and the alternatives are noted. Please see Master Response 1.

Sea-level rise, site contamination odors from the nearby sewage treatment plant, and a wide range of alternatives were evaluated in the EIR. The comment does not provide specific information of asserted analytical deficiencies. The commenter's opinions are noted.

With respect to sea-level concerns specifically, please see Responses to City of Mill Valley Comments related to sea-level rise (Agency Letter No. 3, comments 7-17).

As discussed in greater detail in Response to Comment #9 for the Mill Valey Modernization Mess Comments, the Draft EIR's analysis of the alternatives was properly based on the 2021 Facility Master Plan data, which was the best data available when the Notice of Preparation was issued on June 14, 2024. The decision to base the Draft EIR's analysis of the alternatives on this data is based on substantial evidence in the record and is proper, and there is no requirement under CEQA that would require the District to update its analysis to reflect the enrollment data suggested by the commenter. In addition, the District received a new demographic study in February 2025, which contained projections that were generally similar to the 2021 Facility Master

Plan, thereby indirectly supporting the original use of the 2021 Master Facilities Plan's enrollment projects.

332. William Schmetterer Comments

From: **William Schmetterer** <william@housingguild.com>
Date: Mon, Oct 20, 2025 at 2:04 PM
Subject: New middle school
To: jarroyo@mvschools.org <jarroyo@mvschools.org>

Hi.

I'm writing to express my opinion that the new middle school be rebuilt on the existing site at 425 Sycamore.

There are numerous reasons to keep the middle school at the current location, including the following;

1. Lomita dr is only a two-lane road, whereas Camino Alto is a four-lane road leading to the school's current entrance. Lomita dr is already dangerously overcrowded just with the traffic to and from Edna Maguire School.

2. Lomita dr is a very unique street, with a rare combination of users. It is a designated bicycle route on the published Marin County bicycle map and is also used by pedestrians seeking access to the Horse Hill Open space, along with frequent horseback riders from Horse Hill and grade school children walking and riding their bicylces to and from school.

The original planners were wise picking the Sycamore site, with it's four lane access road, central city location, etc.

Just because the school is older and needs to be updated doesn't mean that the location is bad too.

Thanks,

William Schmetterer

Responses to William Schmetterer Comments

Please see Master Responses 1 and 3.

D. ORAL COMMENTS PRESENTED ON SEPTEMBER 10, 2025 SCHOOL BOARD MEETING

A list of persons that provided oral comments on the Draft EIR during the public meeting on September 10, 2025, is provided in **Table C&R-3**.

TABLE C&R-4. ORAL COMMENTS ON THE DRAFT EIR

Number	Commenter	Comment	Response
M-1	Ralf Modrich	Dojo is important community resource; concerned with social impacts of its removal.	Please see Master Response 2
M-2	Michael Goodwin	Prefers Sycamore Campus and onsite interim housing	Please see Master Response 1
M-3	Kaiya Forzley	Dojo is an important community resource	Please see Master Response 2
M-4	Chantal Carlon	Dojo and after care programs are essential community resource	Please see Master Response 2
M-5	Lara Zegart	Opposes construction at Lomita site; concerned with loss of soccer field access, archaeological resources, emergency access, and doesn't want elementary and middle schools on the same site.	Please see response to Alex and Robert Duvall written comments, below.
M-6	Roger Carlon	Concerned with traffic congestion, emergency access, and non-central location of school facilities at Lomita site.	Please see response to Alex and Robert Duvall written comments, below.
M-7	Dr. Robin Adcock	Opposes displacement of Tae Kwando dojo; stressed importance of dojo and after care program.	Please see Master Response 2.
M-8	Dusty Kenney	Concerned with impacts of alternatives at Lomita site affecting emergency access	Please see Master Response 3.

Number	Commenter	Comment	Response
M-9	Cortney Oldlt	Concerned with impacts of alternatives at Lomita site affecting emergency access and congestion, supports dojo remaining in place.	Please see response to Courtney Oldt written comment.
M-10	Tajjah Dubin	Supports dojo remaining; supports temporary housing at existing MVMS site.	Please see Master Responses 1 and 2.
M-11	Susan Dawson	Concerned with high levels of contaminants and liquefaction hazards at existing site. Will foundations need to be replaced in renovation Alternative; EIR focused on discarded option; District should complete the PEA and additional Geotech studies and then redo the EIR.	See Master Response 7.
M-12	Michelle Passero	Noted that DTSC had comments on the PEA; concerned with soil vapors exceeding regulatory standards, potentially explosive gases, need more info on how these will be addressed.	See Master Response 7.
M-13	Christy Atkisson	Concerned with emergency access issues if school is at Lomita site.	Please see Master Response 3.
M-13	Maggie Spillane	Concerned with traffic congestion and emergency access issues if school is at Lomita site.	Please see Master Response 3.
M-14	Alex Duvall	Existing MVMS site is safe.	Please see Master Response 1.
M-15	Brooke Simmons	Renovation can be done safely at existing school. Concerned about parking and traffic issues at Lomita site. Opposes combining middle school and elementary school children.	Please see Master Responses 1 and 3.

Number	Commenter	Comment	Response
M-16	Dorsi Bonner	Concerned about parking and traffic issues at Lomita site. Supports dojo remaining at Lomita site.	Please see Master Responses 2 and 3.
M-17	Jackson Beard	5th grader. Concerned with outside activities at interim school portables should be near the other school facilities; wants new backpack racks.	Comments are noted. Please see Master Response 1.
M-18	Harper (no last name given)	6th grader. Unhappy with delays and litigation. Need bathrooms near field.	Comments are noted.
M-19	Brooklyn Beard	Concerned re timing of completion of new school; requests a track and bathrooms at field; portables exposed to odors currently.	Comments are noted. Odor impacts are addressed in the EIR Air Quality chapter.
M-20	Sarah Beard	Concerned with litigation and related project delays; Board needs to act.	Comments are noted. Please see Master Response 1.
M-21	Rebecca Stone	Concerned with litigation and related project delays; Board needs to act.	Concerned with litigation and related project delays; Board needs to act.
M-22	Michael Cool	Opposes displacement of Tae Kwando dojo; stressed importance of dojo and after care program.	Please see Master Response 2.
M-23	Amy McCrea	Supports Renovation Alternative; concerned with traffic impacts at the Lomita site.	Please see Master Responses 1 and 3.
M-24	Anita Sparks	Concerned with litigation and related project delays; supports Renovation Alternative.	Please see Master Response 1.
M-25	Eliza Lochner	Supports project at current site; kids are ok with portables.	Please see Master Response 1.

Number	Commenter	Comment	Response
M-26	Leighton Lochner	Supports project at current site; kids are ok with portables. Supports retaining dojo.	Please see Master Responses 1 and 2.
M-27	Courtney Gaiman	Supports current MVMS site; concerned with dojo displacement, traffic congestion, and construction on Native American site.	Please see Master Responses 1, 2, and 3. See also response to Alex and Robert Duvall written comments, below.
M-28	Jeremy Revitch	Opposes Alternative 3, concerned with traffic impacts at the Lomita site.	Please see Master Responses 1 and 3.
M-29	Patty Robbins	Supports renovation alternative; concerned with traffic congestion and safety at Lomita site.	Please see Master Responses 1 and 3.
M-30	Kelly Ellis	Supports current MVMS site; concerned with dojo displacement, traffic congestion. Lomita site is too small – below state standards. Wants dojo retained.	Please see Master Responses 1-4.
M-31	Douglas Nelson	Prefers Renovation Alternative; concerned with deep soil mixing- would it destroy trees; opposes new canopies that would shade existing library and cover entry garden.	Please see responses to Nancy Sigerman written comments regarding project design. Please also see Master Response 1. Deep Soil Mixing and subsequent construction of new foundations and buildings would require removal of all existing structures and vegetation in the foundation area.

CHAPTER 4
TEXT CHANGES TO THE DRAFT EIR

The following text changes are made to the Draft EIR and incorporated as part of the Final EIR. Revisions to the Draft EIR are shown in underline for additions and ~~strikethrough~~ for deletions.

These changes comprise minor edits to the Draft Environmental Impact Report. Revisions herein do not result in new significant environmental impacts, do not constitute significant new information, nor do they alter the conclusions of the environmental analysis.

A REVISIONS TO ALTERNATIVE 5 ANALYSIS

The text discussion of Alternative 5 on pp. 5-26 through 5-30 of the EIR is replaced with the following expanded discussion. No new potentially significant impacts have been identified.

ALTERNATIVE 5: RENOVATION OF THE EXISTING MVMS MAIN BUILDING AND GYM

Alternative Description

This alternative would rehabilitate the existing Mill Valley Middle School buildings – both the Main Building (92,000 SF) and the Multi-Purpose/Gymnasium Building (15,200 SF) – addressing exterior and interior finish materials as well as infrastructure improvements such as heating, ventilation and air conditioning, fire sprinklers and upgrades to electrical systems. Additionally, this alternative would address accessibility issues throughout, including the introduction of a new elevator and restroom improvements. As part of the renovation, a sub-slab de-pressurization system would be installed below the existing building to address potential VOC concerns. Site improvements include solar canopies, outdoor learning spaces and improvements for safety and security (perimeter fencing). In addition, a new, roughly 4,000 SF, classroom building education is proposed at the north end of the existing main building. The conceptual plan for this alternative is shown on **Figure 24.**

For the Renovation Alternative, an estimated 15,000 cubic yards of spoils requiring offsite disposal would be generated during construction, and 6,000 cubic yards of fill would be imported to the site (i.e., 25 percent of the Project's earth-moving). For the interim campus, an estimated 14,300 cubic yards of spoils requiring offsite disposal would be generated during construction, and 3,500 cubic yards of fill would be imported

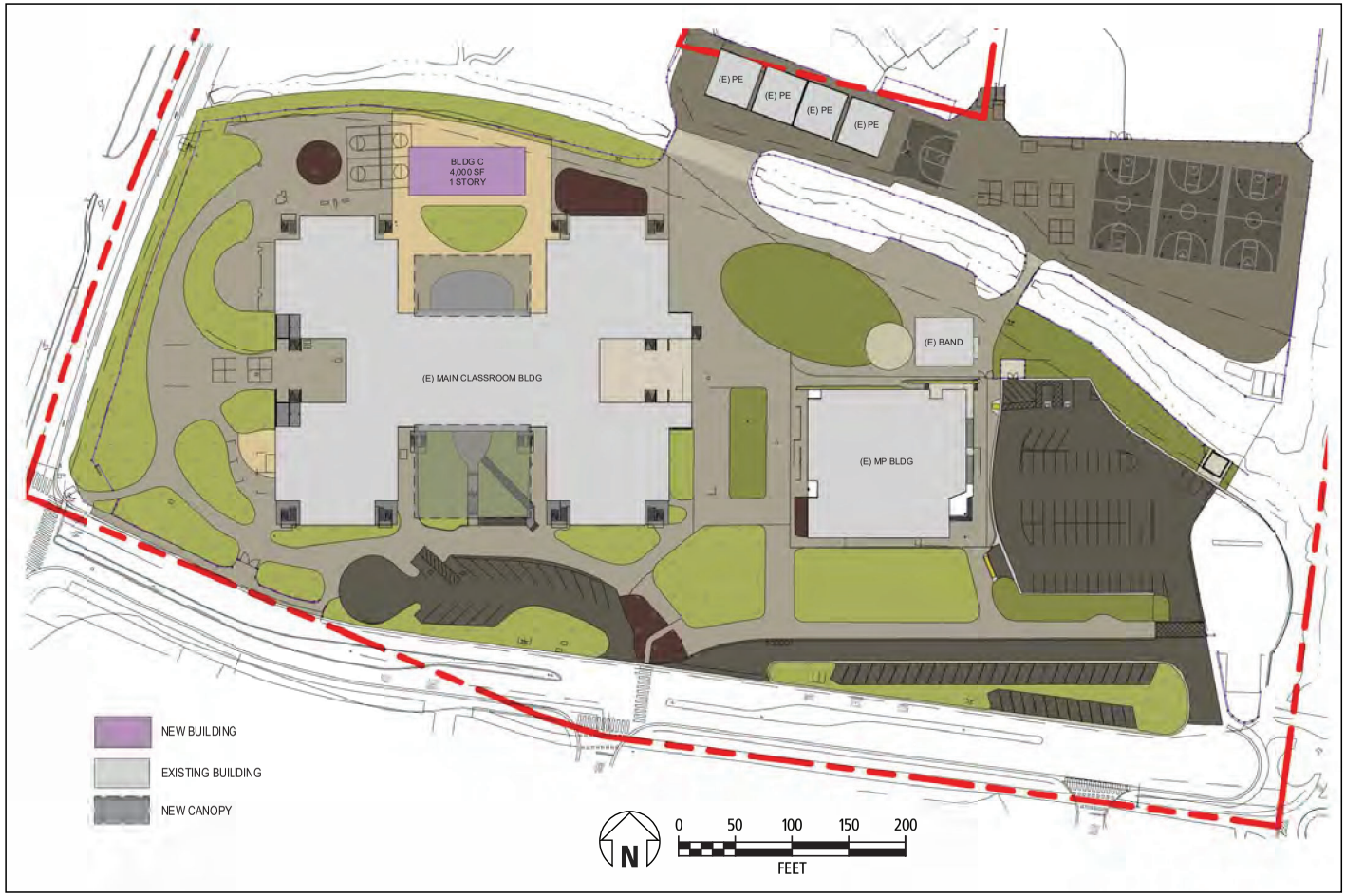


Figure 24
Renovation Alternative Site Plan

Source: Lionäkis | Architecture | Interior Design | Structural Engireering

to the site. Construction of this alternative would result in a total graded area of 2.4 acres for the permanent school and 1.38 acres for the Interim Campus, for a total of 3.78 acres (about 2/3 less than the Project's proposed graded area). Renovation Alternative construction is anticipated to begin in June of 2026 and be completed approximately by the end of 2028. Construction activities would be conducted from 8 a.m. to 6 p.m. Monday through Friday.

Five existing portable buildings would remain after renovation (four PE buildings and the Band Room). This alternative would involve construction of an interim campus at the MVMS site, as with the proposed Project. The District Offices would be relocated to the Edna Maguire Elementary School or another existing District building.

Environmental Impacts

Aesthetics

Under this alternative the existing main building and gym would be renovated and a new 4,000-sq. ft. classroom building would be constructed. Overall, the aesthetics of the site would be similar as with the proposed Project.

Air Quality

A detailed air quality assessment was prepared for this alternative and is included in Appendix C of this document[21]. The air quality impacts, including health impacts, for the Renovation Alternative would be lower than the proposed Project. The total construction emissions for the Renovation Alternative are approximately 50 percent of the values associated with the proposed Project due to the elimination of demolition activities, less grading activities, and less building construction. These lower emissions lead to a reduction in health impacts. During unmitigated construction the maximum cancer risk from unmitigated construction emissions for an interim campus student receptor would be 9.2 per million (compared to 15.2) and an interim campus staff receptor would be 1.9 per million (compared to 3.2). During mitigated construction the maximum cancer risk from unmitigated construction emissions for an interim campus student receptor would be 0.3 per million (compared to 0.6) and an interim campus staff receptor would be 0.1 per million (compared to 0.2).

The results are similarly lower for the Renovation Alternative for other receptors (existing campus, nearby residences, and Friends Field) and other metrics such as acute and chronic hazards, and annual PM2.5 concentrations, when compared to the proposed

[1] Technical Memorandum "Mill Valley Middle School Renovation Alternative – Air Quality Impacts", from Mike Ratte, Senior Air Quality Scientist, RCH Group, to Richard Grassetti, Grassetti Environmental Consulting, September 30, 2025.

Project.

In conclusion, the air quality and health impacts for the Renovation Alternative would be less than significant with mitigation. The odor impacts would be similar to or less than the proposed Project given that filtration would be improved in the renovated building compared with the existing building, and the existing main building is slightly more distant from the wastewater treatment plant than the nearest building in the proposed Project. Odor impacts to the interim campus occupants would be similar to with the proposed Project.

Biological Resources

Biological resources impacts from construction of the interim campus would be the same as with the proposed Project. Renovation of the existing building would reduce the potential for disturbance of nearby special status birds and wildlife because it would not include the potential for noise, dust, and soil erosion from the proposed Project's demolition of the existing building, more extensive grading, and construction of new buildings. Therefore, this alternative would have reduced potential for impacts to biological resources compared to those of the proposed Project.

Cultural Resources

This alternative would have about 2/3 less graded area than with the proposed Project. In addition, the likelihood of significant cultural resources at the Project site is very low. Therefore, this alternative would have similar impacts compared to the proposed Project, assuming the interim campus is at the Project site.

Geology, Soils, and Seismicity

This alternative would not renovate the existing buildings and foundations to meet current building code seismic requirements. Therefore it may be more susceptible to seismic hazards than the proposed Project. Even so, the potential for seismic hazards would remain low in part due in part to the design requirements imposed by the legal framework applicable to the original construction.

The Field Act was introduced in 1933 along with other laws that prohibit the construction of unreinforced masonry buildings, and required that earthquake forces be taken into account in structural design for public school buildings. The Field Act also established the Office of the State Architect (now Division of the State Architect or DSA) which developed design standards, quality control procedures, and required that schools be designed by registered architects and engineers. These professionals must submit their plans and specifications to the State Architect for review and approval prior to construction. The same professionals were also required by the Field Act to periodically inspect the construction while underway and verify that the actual work completed is in

compliance with the approved drawings. Peer review and inspection requirements were also introduced as another quality control procedure.

Since 1940, no building constructed under the Field Act has either partially or completely collapsed, and no students have been killed or injured in a Field Act compliant building. As such, to guide renovation of the buildings designed under Field Act requirements, the California Administrative Code (*see, e.g*., Section 4-309) establishes a 50% replacement cost threshold for the evaluation and retrofitting of structural systems. Additionally, this requirement can be triggered when seismic weight or wind loads are increased by more than 10% from the original construction and/or impacts on the lateral force resistance of more than 10% due to modifications to the structure. This alternative will use a percentage of that 10% with the addition of fire sprinklers which will add some "seismic weight" to the building, but will not require any rehabilitation pursuant to the California Administrative Code. To the extent there are any existing seismic hazards, CEQA generally does not require an analysis of the impact of existing environmental conditions on a proposed project. (*California Building Industry Association v. Bay Area Air Quality Management District* (2015) 62 Cal.4th 369, 377 [holding that agencies subject to CEQA are generally not required to analyze the impact of existing environmental conditions on a project's future users or residents].) To the extent there are existing seismic hazards at the site, such hazards are considered existing conditions of the site and are not project impacts requiring analysis or consideration under CEQA. In some cases, CEQA may require additional analysis where a project risks exacerbating environmental hazards or conditions that exist. (*East Sacramento Partnerships for a Livable City v. City of Sacramento* (2016) 5 Cal.App.5th 281, 296.) As discussed above however, the alternative would not exacerbate any existing conditions and therefore CEQA does not require any additional analysis of the impacts of sea level rise on the Project. (*Id*. at 296-97.)

There would also be a reduction in grading with this alternative because the disturbed area would be reduced by about 2/3rds, however the site is relatively flat and site erosion hazards are low.

GHG Emissions

Overall, the construction impacts on GHG emissions would be lower than the proposed Project, as shown within the Technical Memorandum on Air Quality included as Appendix C to the Final EIR. The operational impacts on GHG emissions would be similar as with the proposed Project because the number of students and building square footage would not exceed that analyzed in the project as discussed in the Technical Memorandum on Air Quality.

Hazards, Hazardous Materials, and Wildfire

This alternative would involve some construction within the former landfill underlying portions of the existing school, although less disturbance would occur than under the Proposed Project. The interim campus would be exposed to some potential dust and emissions hazards, but these would be reduced compared with the proposed Project due to the substantial reduction in earth disturbing activities.

A Human Health Risk Assessment (HHRA) was prepared for this alternative as part of the updated Preliminary Endangerment Assessment (PEA)[22]. The PEA is included as Appendix E to this document. The results of the HHRA are summarized below.

Cancer Risks and Hazards Index for Multi-pathway Soil Exposure

Cancer risks and hazard indexes from multi-pathway soil exposure (including incidental soil ingestion, dermal contact, and fugitive dust inhalation) were evaluated in the HHRA using the maximum detected concentrations of COPCs.

The incremental cancer risks estimated for the current school exposure scenario were lower than the cancer risk benchmark established by DTSC for students but slightly above the benchmark for staff. However, the incremental cancer risks estimated for staff are within the risk management range of 1E-04 and 1E-06. Risks lower than 1E-06 are generally considered acceptable.[23] By comparison, risks that exceed 1E-04 are generally considered unacceptable.

- 4 in a million (4E-06) for School Staff (HHRA Table J-6).
- 0.7 in a million (7E-07) for School Students (HHRA Table 7).

The hazard indexes estimated for the current school exposure scenario were less than 1 such that the chemicals detected do not pose a current health hazard to staff and students:

- 0.3 for School Staff (HHRA Table 7).
- 0.4 for School Students (HHRA Table 7).

The incremental cancer risks estimated for the hypothetical residential exposure scenario were:

- 40 in a million (4E-05) for Adult and Child Residence (HHRA Table 8).

The hazard index estimated for the hypothetical residential exposure scenario is:

[22] Ninyo & Moore, Draft Preliminary Endangerment Assessment Report (PEA), Mill Valley Middle School, 425 Sycamore Avenue, Mill Valley, California, prepared for the Mill Valley School District, October 16, 2025.
[23] *E.g.*, DTSC, Human Health Risk Assessment (HHRA) Note Number 3, DTSC-modified Screening Levels (DTSC-SLs), revised Apr. 2025 (identifying target risk level of $1x10^{-6}$ (one in one million) and a target hazard quotient value of 1.0).

- 70 for Child Residence (HHRA Table 8).

Based on the above, the HHRA concluded as follows:

- Arsenic was detected in soil at concentrations greater than the Site-specific background concentration of 15 mg/kg, and lead was detected in soil at concentrations greater than the DTSC's screening level of 80 mg/kg, which could pose a potential risk without mitigation.
- 95UCL calculations show that arsenic and lead concentrations in the top foot of soil are below applicable screening levels. The Site's existing cover prevents Site users from direct exposure to elevated arsenic and lead concentrations in soil.
- Exposure to other COPCs detected in shallow soil (0 to 1-foot bgs) do not pose a health hazard for current staff and students for direct exposure (Table 7).
- The incremental cancer risk estimated for the school students is below the 1E-06 benchmark (Table 7).
- The incremental cancer risk estimated for the school staff slightly exceeds the 1E-06 benchmark when based on the maximum dioxin TEQ and using the toxicity from the most toxic of the dioxins. However, under a more realistic exposure scenario that uses the 95UCL dioxin TEQ for shallow soils (8.93 pg/g), the estimated cancer risk for school staff is 1E-06, which is equal to the DTSC's benchmark of 1E-06 and therefore considered acceptable
- Exposure to maximum concentrations of COPCs detected in soil within the landfill waste could, if not mitigated, pose a cancer risk and/or health hazard to the hypothetical residential receptor (HHRA Table J-7).

Cancer Risks and Hazards Index for Soil Vapor Intrusion (Indoor Air Inhalation)

Incremental cancer risks from sub-slab svapor (inhalation of indoor air) were evaluated in the HHRA, using the maximum detected VOC concentrations.

The incremental cancer risks estimated for the current school exposure scenario are:

- 0.4 in a million (4E-07) for School Staff (HHRA Table 12).
- 0.03 in a million (3E-08) for School Students (HHRA Table 13).

The hazard index estimated for the current school exposure scenario are:

- 0.01 for School Staff (HHRA Table 9).
- 0.006 for School Students (HHRA Table 10).

The cancer risks estimated for the hypothetical residential exposure scenario are:

- 20 in a million (2E-05) for Adult and Child Residence (HHRA Table 14).

The hazard index estimated for the hypothetical residential exposure scenario are:

- 3 for Child Residence (HHRA Table 11).

Based on the above, the HHRA has the following soil vapor health risk conclusions:

- VOCs detected in sub-slab soil vapor do not pose a health hazard for current students or school staff for indoor air exposures (HHRA Tables J-8 and J-9).
- The incremental cancer risks estimated for both school students and staff are below the 1E-06 benchmark for indoor air exposure. (HHRA Tables 12 and 13)
- For the hypothetical residential receptor, indoor air exposures to VOCs detected in soil vapor could, if not mitigated, pose a health hazard and a cancer risk (HHRA Tables 11 and 14).

The incremental cancer risk estimated from sub-slab soil vapor for the school student and staff receptors is below the benchmark value of 1E-06 (HHRA Tables 12 and 13) and is considered acceptable. The hypothetical residential receptors exceeded the 1E-06 benchmark. The risk drivers for the hypothetical residential exposure scenario were 1,2-dichlotroethane, benzene, ethylbenzene, and naphthalene.

The risk and hazard calculations assumed multiple exposures to chemicals via incidental soil ingestion, dermal contact, outdoor inhalation, and inhalation of indoor vapors in accordance with USEPA and DTSC guidance. The results are based on multiple health-protective assumptions. For example, it was assumed that a VOC reservoir is located under the site and that this VOC reservoir is unlimited in concentrations that are continuously released as vapors for up to 26 years.

As with the proposed Project, this alternative would be coordinated with DTSC and/or the County LEA to ensure risks of long-term exposure to existing site contamination would be addressed and would therefore be similar to the proposed Project. As discussed previously, the site of this alternative is underlain by the former Mill Valley Dump, which contains landfill waste impacted with COPCs and has resulted in contamination of soil and soil vapor with hazardous materials at levels exceeding conservative screening thresholds in on-site sampling. However, similar to the Project, the potential for health risks associated with direct contact to contaminants in soil would be mitigated by the fact that most of the area proposed for modular buildings is capped with asphalt, thereby preventing exposure. Further, the potential for soil vapor intrusion into the proposed Interim Campus modular buildings would be reduced to less-than-significant levels by natural ventilation below the modular buildings and potential use of the HVAC system

with fresh, outdoor air entering the modular buildings. It is further assumed that this alternative would be subject to Mitigation Measures 3.7-1 and 3.7-2, which require in part that the District prepare and implement a Mitigation Plan and PCLUP for the Project Site in consultation with DTSC and the LEA that ensures that potential risks are managed in accordance with environmental agency regulations, standards and guidance such that, with any applicable mitigation measures, risks are below the benchmark thresholds. The District also has committed to install a sub-slab depressurization system to prevent VOCs in soil vapor from entering the building from the soil regardless of the sub-slab vapor and soil vapor concentrations. It is further assumed that the renovation would involve sealed windows and MERV-13 air filters, as with the Project. With the implementation of mitigation measures, all potential impacts would be reduced to a level of insignificance.

Groundwater Exposure

The groundwater exposure pathway is incomplete and does not present a risk because there is no domestic or industrial use of groundwater from the Project area.

Ecological Risks

Ecological risks would be minimal, as with the Project. Consistent with the findings in the Screening-Level Ecological Risk Assessment, there do not appear to be a significant soil pathway of exposure to ecologically sensitive receptors and COPCs detected within the school grounds would not pose a potential threat to ecological receptors. While there may be a hazard to fish and wildlife in Ryan Creek, this alternative would not involve any construction near or in Ryan Creek, and all construction materials and excavated materials also would not be near the creek. Therefore, similar to the proposed Project, this alternative would have a less than significant impact to health risks to ecological receptors.

Wildfire hazards would be negligible, as with the Project. No portions of the project site are located on lands that are classified as Very High Fire Hazard Severity Zones, and this alternative would renovate an existing school on the same overall site. Therefore, it would not create or subject the students or staff to significant wildlife risks.

Sea Level Rise Risks Associated with Hazardous Materials

Sea-level rise (SLR) may result in negative impacts to the site that may lead to increased environmental concerns and issues at the site, primarily associated with groundwater and soil vapor. Please see the Hydrology section of this EIR for further discussion of SLR. SLR impacts related to rising groundwater at the Site would be required to be addressed through collaboration with multiple stakeholders since the historical footprint of the landfill expands beyond the Site boundaries and is overlain by multiple properties with

different owners. Sea level rise is an impact of the environment on the alterative and CEQA is generally concerned with the impacts of the project on the environment rather than the impacts of the environment on the project. (*See also Citizens' Committee to Complete the Refuge v. City of Newark* (2021) 74 Cal.App.5th 460, 476-78.)

Hazardous Materials in School Buildings

Hazardous materials in the existing Main Building may be encountered during rehabilitation of that building. Mitigation measures 3.7-4, 5, and 6 in the EIR would reduce this impact to less than significant.

Hydrology and Water Quality

Under this alternative, there would be a reduction in grading compared with the Project because the disturbed area would be reduced. However, the site is relatively flat and site erosion/ sedimentation hazards are low. The renovated building would not be raised/ further protected from sea-level rise, therefore potential sea-level rise concerns would not be reduced, as proposed with the Project. However, CEQA case law makes clear that an EIR is not required to consider the impact of sea level rise on proposed projects. (*Ballona Wetlands Land Trust v. City of Los Angeles* (2011) 201 Cal.App.4th 455, 473-76 [holding that since CEQA does not require an EIR to identify the significant effects of the environment on a project, CEQA generally does not require an analysis of the impact of sea level rise on a project].) This is because CEQA is generally concerned with the impacts of the project on the environment rather than the impacts of the environment on the project. (See also *Citizens' Committee to Complete the Refuge v. City of Newark* (2021) 74 Cal.App.5th 460, 476-78.)

Land Use, Planning, and Agriculture

This alternative would continue school uses on the MVMS site, as would the Project. Therefore, land use and planning impacts would be identical to those of the Project.

Noise

A detailed noise assessment was prepared for this alternative and is included in Appendix C of this document[24]. This alternative would not involve demolition of the existing main school building, and the grading would be substantially reduced compared to the proposed Project. Thus, the construction noise and vibration impacts for the renovation alternative would be lower compared to the construction noise and vibration impacts for the proposed Project. Furthermore, under this alternative, construction activities would

[24] Technical Memorandum "Mill Valley Middle School Renovation Alternative – Noise and Vibration Impacts", from Luis Rosas, Noise Technical Associate, RCH Group, Daniel Jones, Senior Project Manager, RCH Group, to Richard Grassetti, Grassetti Environmental Consulting, September 30, 2025.

last 2 years instead of 3 years needed for the proposed Project, thus, the noise exposure to significant noise impacts from construction activities would be less.

Under Alternative 5, the interior noise impacts at the interim campus from construction would be reduced to a 0 dB increase (compared to a 1 dB increase in interior noise with the replacement project). This impact would remain less than significant.

Exterior noise impacts at the interim campus from construction would be reduced to a 13 dB increase (compared to a 15 dB increase in exterior noise with the replacement project). However, the exterior noise impacts at the interim campus would remain a significant and unavoidable impact because construction noise of the Renovation Alternative would still exceed the exterior noise threshold of 5 dB, Leq (1-hour) threshold (a readily perceptible increase).

The construction noise and vibration impacts at other receptors (nearby residences, Mt. Tamalpais United Methodist Church, Friends Field, etc.) under this alternative would be slightly lower than with the Project and would remain less than significant.

Operational traffic noise impacts for this alternative would be the same as for the replacement project since there would be no change to the student capacity.

Transportation

This alternative would use the same access facilities as with the proposed Project and would be at the same location. This alternative further would not involve an increase in enrollment or site users. Therefore, levels of service, safety, parking, access and VMT impacts would be the same as with the proposed Project. See also Master Response 3 in the Final EIR for a discussion regarding traffic congestion generally.

In addition, CEQA generally does not require an analysis of the impact of existing environmental conditions on a proposed project. (*California Building Industry Association v. Bay Area Air Quality Management District* (2015) 62 Cal.4th 369, 377.) In some cases, CEQA may require additional analysis where a project risks exacerbating environmental hazards or conditions that exist. (*East Sacramento Partnerships for a Livable City v. City of Sacramento* (2016) 5 Cal.App.5th 281, 296.) Here, however, this alternative would not exacerbate any existing conditions and therefore CEQA does not require any additional analysis for this alternative. (Id. at 296-97.)

Tribal Cultural Resources

Tribal cultural resources for the permanent campus would be the same as described in Chapter 3.11. Similarly, assuming the interim campus is located at the existing MVMS site, no impacts are expected. No impacts to resources at that site are expected.

Public Services and Utilities

This alternative would be in the same location and of similar capacity as the proposed Project. It is assumed that the renovated building would have updated energy and water conservation, and fire and health safety facilities. Therefore, services and utilities impacts would be similar to the proposed Project.

Energy

This alternative would bring the existing building's glazing and insulation up to current codes, as well as incorporate rooftop and/or parking lot solar panels. Construction energy would be reduced compared with the Project. Therefore, this alternative would have similar or slightly reduced overall energy demand impacts. In any case, this energy use would be neither excessive nor wasteful and no potentially significant impact would occur.

B. REVISIONS TO TRIBAL CULTURAL RESOURCES ANALYSIS

At the request of the Federated Tribes of Graton Rancheria, the Tribal Cultural Resources discussion in Section 3.4 of the DEIR has been broken out into a separate 'Tribal Cultural Resources" chapter, Chapter 3.11. That chapter, which does not identify any new potentially significant impacts, is presented below:

3.11 TRIBAL CULTURAL RESOURCES

The Tribal Cultural Resources (TCR) section describes the environmental setting and regulatory setting for TCRs in the vicinity of the proposed Project. It also describes the impacts on TCRs that would result from construction and operation of the proposed Project and mitigation measures that would avoid or reduce significant impacts, where feasible. Pursuant to the requirements of AB 52, this section also summarizes consultation efforts conducted with the Native American tribes, organizations, and individuals listed with the NAHC's as having traditional and cultural affiliations with the proposed Project's geographic area.

3.11.1 Setting

Regulatory Setting

Tribal Cultural Resources

As defined at PRC Section 21074, a TCR is a site, feature, place, cultural landscape, sacred place or object that is of cultural value to a California Native American tribe and is either: (1) in or eligible for the CRHR or a local historic register; or (2) the lead agency, at its discretion, chooses to treat the resource as a TCR. TCRs are similar to traditional cultural

properties in terms of their characteristics, identification, and treatment, and may include a cultural landscape to the extent that the landscape is geographically defined in terms of the size and scope of the landscape. Additionally, as defined at PRC Section 21074, a historical resource, a unique archaeological resource, or a non-unique archaeological resource may also be a TCR if it conforms to the criteria of a TCR in PRC Section 21074(a). CEQA mandates that lead agencies determine whether a project will have a significant impact on TCRs that are eligible for listing in the CRHR (i.e., a historical resource), or are determined to be significant by the lead agency in order to appropriately mitigate any such impacts. Consultation with California Native American tribes is an integral component of each of the cultural resources investigation steps described above.

Assembly Bill 52 and Consultation

The lead agency for CEQA, in this case Mill Valley School District (MVSD), is responsible for consultation with Native American tribes regarding the potential for a project to impact TCRs, pursuant to AB 52 and PRC Sections 21073, 21074, 21080.3.1, 21080.3.2, 21082.3, 21083.09, 21084.2, 21084.3, and 5097.94(m). AB 52 recognizes that "… tribes may have expertise with regard to their tribal history and practices, which concern the tribal cultural resources with which they are traditionally and culturally affiliated …" and that consultation will occur between a lead agency and Native American tribes for covered projects.

As described in Section 3.4, Cultural Resources, a proposed project may induce a significant impact to a historical resource, unique archaeological resource, or a TCR if it causes a substantial adverse change (i.e., physical demolition, destruction, relocation, or alteration) to the resource or immediate surroundings (14 CCR Section 15064.5[b]), thereby demolishing or significantly altering the physical characteristics that qualify it for listing on the CRHR or local registers (PRC Sections 5020.01[k] and 5024.1[g]). A project that may cause a substantial adverse change in the significance of a TCR is a project that may have a significant effect on the environment (PRC Section 21084.2). A lead agency will establish measures to avoid impacts that would alter significant characteristics of a TCR, when feasible (PRC Section 21084.3).

Health and Safety Code 7050.5: Human Remains

Section 7050.5 of the California Health and Safety Code states that, in the event of discovery or recognition of any human remains in any location other than a dedicated cemetery, there shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains until the coroner of the county in which the remains are discovered has determined whether the remains are subject to the coroner's authority. If the human remains are of Native American origin, the coroner must notify the NAHC within 24 hours of this identification.

Public Resources Code 5097.98: Notification of Most Likely Descendant

PRC Section 5097.98 states that the NAHC, upon notification of the discovery of Native American human remains pursuant to Health and Safety Code Section 7050.5, shall immediately notify the MLD of the deceased. With permission of the landowner or a designated representative, the MLD may inspect the remains and any associated cultural materials and make recommendations for treatment or disposition of the remains and associated grave goods. The MLD shall provide recommendations or preferences for treatment of the remains and associated cultural materials within 48 hours of being granted access to the site.

California Native American Graves Protection and Repatriation Act (California Health and Safety Code Section 8010 et seq.)

The California Native American Graves Protection and Repatriation Act establishes a state repatriation policy consistent with, and facilitates implementation of, the federal Native American Graves Protection and Repatriation Act. The act strives to ensure that all California Native American human remains and cultural items are treated with dignity and respect, and asserts intent for the state to provide mechanisms for aiding California Native American tribes, including non-federally recognized tribes, in repatriating remains and cultural items.

Native American Historical, Cultural, and Sacred Sites

Pursuant to PRC Section 5097.94 the NAHC has authority and duty to "identify and catalog places of special religious or social significance to Native Americans and known graves and cemeteries of Native Americans on private lands" and has the power and duty to make recommendations for acquisition by the state or other public agencies regarding Native American sacred places that are located on private lands, are inaccessible to Native Americans, and have cultural significance to Native Americans.

Environmental Setting

Archaeological Context

San Francisco Bay Region Temporal Framework

The initial cultural sequence for central California was defined largely on the basis of stylistic variation in artifacts from graves excavated in the lower Sacramento Valley (Lillard et al. 1939). Beardsley (1948) later extended this sequence to include the Bay-Delta Area (Hughes 1994). Although radiocarbon dating has since demonstrated that distinct culture-historical traditions coexisted in different geographic regions of central California (Bennyhoff and Fredrickson 1994), the most recent and refined chronology for the Bay-Delta Area, referred to as Scheme D (Groza 2002; Groza et al. 2011; Milliken et al. 2007), continues to employ the original all-encompassing three-part sequence—Early, Middle, and Late Periods. Groza et al. (2011) presents a complete summary of radiocarbon results and chronology for Scheme D, based on stylistic temporal variation in well-dated and widely traded shell bead types. It is primarily a Late Holocene sequence (post-4200 cal BP [calibrated years Before Present), although the onset of the Early Period is generally considered to have its origins in the Middle Holocene (>4200 cal BP; Lightfoot 1997; Ragir 1972).

Owing to a dearth of evidence for earlier occupation in the Bay-Delta Area, additional terms are lacking to refer to the Terminal Pleistocene through Middle Holocene archaeological record (13,500–4200 cal BP), although some researchers have opted to extend the label "Early Period" further and further back in time. Others, however, employ the precontact periods defined by Fredrickson (1974, 1984, 1994) to track broad socio-economic and technological trends in central California and the North Coast area. As originally conceived, these include Paleoindian (10,000–6000 BC), Lower Archaic (6000–3000 BC), Middle Archaic (3000–1000 BC), Upper Archaic (1000 BC–AD 500), Lower Emergent (AD 500–1500), and Upper Emergent (AD 1500–1800). This temporal scheme no longer bears a relationship to well-documented changes presented in the Scheme D chronology, but the socio-economic and technological trends it encapsulates may remain relevant, particularly for earlier periods (>4500 cal BP).

Ethnographic Context

The Coast Miwok traditionally inhabited the region that encompasses the project area. Coast Miwok territory encompassed the area along the coast and inland between Duncan's Point north of Bodega Bay southward to San Pablo Bay and as far inland as the Napa River. One ethnographic village likely associated with the Coast Miwok has been documented in the general vicinity of the project area. This consists of Anamas (Goerke 2007) which was located just under 1/2 mi. to the north/northwest (or approximately 4.7 mi. to the southeast

[Milliken et al. 2009]), and Liwanelowa, which according to Kelly (1978), Merriam (1907), and Milliken et al. (2007) was situated about 4 mi. to the southeast.

Coast Miwok political organization revolved around village life. In larger villages, the chief held a nonhereditary position. The chief was responsible for taking care of the villagers, advising them, and overseeing activities in the mixed dance house. The reigning chief and four elderly women tutored upcoming chiefs (Kelly 1978). Other leaders of the Coast Miwok included woman chiefs and Maiens. The woman chief functioned primarily as a ceremonial leader deeply involved in the Bird Cult that presided over the Acorn Dance and Sunwele Dance. The Maien was the head of the female ceremonial house who directed the construction of new dance houses, supervised the preparation of food for special events, sent invitations for dances, and often selected dance performers (Kelly 1978).

Coast Miwok villages were composed of various structures including residential dwellings, sweathouses, and secret society dance houses. Residential dwellings were conical structures framed with willow or driftwood and thatched with bunches of grass, tule reeds, or rushes. Each house held from six to ten individuals and had a central stone hearth and a smoke hole in the roof. Sweathouses were round, semi-subterranean structures recessed into the earth 4 to 5 ft. A framework of poles supported a brush, grass, and earth covering. Secret society dance houses were much like the sweat lodges although one type was built for mixed gender dances, and another was for female secret society dances (Kelly 1978).

Subsistence was reliant on both plant and animal resources exploited along the coast and inland. Fishing and hunting were common, as was gathering plants and marine resources. The Coast Miwok relied on a diet of animals such as salmon, eels, crab, mussels, clams, mudhens, geese, bears, elk, deer, rabbits, squirrels, woodrats, and gophers. Plant resources gathered by the Coast Miwok included buckeye, pepperwood, seeds, greens, acorns, tobacco, and kelp. Acorns, an important staple in their diet, were pulverized into mush and meal for bread.

Today, the Graton Rancheria community encompasses “a federation of Coast Miwok and Southern Pomo groups recognized as a tribe by the United States Congress. The Miwok of west Marin County have, through the years, been referred to as Marshall Indians, Marin Miwok, Tomales, Tomales Bay, and Hookooeko” (Federated Indians of Graton Rancheria 2023). The Tribe opened the Graton Resort and Casino in 2013, which now funds various programs and services for its tribal membership, including environmental and cultural preservation, elder care, childcare, housing, legal support, emergency financial support, education, and employment. Graton Rancheria has developed a Tribal Heritage Preservation Office program with a designated Tribal Heritage Preservation Officer (THPO) and Sacred Site Protection Committee responsible for protecting the Tribe’s tribal cultural resources.

Project Site Cultural Resources Setting

The environmental setting for TCR is consistent with that described in Section 3.4, Cultural Resources. According to the California Department of Toxic Substances Control (DTSC), the 40-ac. Mill Valley Dump (the "dump") operated within and in the immediate vicinity of the project area as a burn dump during early-mid 20th century prior to being closed in the 1950's. The dump operated approximately forty years and received household waste. Refuse was burned along the west side of a drainage canal at the eastern edge of the project area, and north of Sycamore Avenue. The burned refuse was spread as fill over the rest of the site and covered by a soil cap (2–3 feet of sandy clay). Unburned refuse consisting of glass, metal, wood, paper, plastic and organics (typical household rubbish) extends from approximately 2 to 13.5 ft. below the present-day ground surface. The refuse layer is thinner to the north and thicker and deeper to the south and southeast. Mill Valley Middle School was built on the southwest portion of the former dump site in 1969.

Further insights into the effects the dump might have had on the topography and soils of the project area are provided in the Geotechnical Evaluation and Geologic Hazard Assessment report prepared for the Project (Ninyo & Moore 2024). According to geotechnical borings placed within the project area, fill and debris were encountered between 10 and 20 ft. below the present-day ground surface. Bay mud was documented immediately under the fill and debris indicating that no drained upland formations that might have supported early Native American habitation were present during the prehistoric or ethnographic eras.

The cultural resources records searches results did not identify any precontact period archaeological resources within the Proposed Project area.

NAHC Files Review

The Native American Heritage Commission (NAHC) is a state office that maintains the Sacred Lands File, an official list of sites that are of cultural and religious importance to California Native American tribes.

To meet PRC requirements, on May 8th, 2024, Solano Archaeological Services (SAS) emailed a letter and a map depicting the project area and surrounding vicinity to the NAHC requesting a Sacred Lands File (SLF) search, and a list of Native American community representatives who might have an interest in, or concerns with the proposed Project. On May 17th, 2024, the NAHC responded to SAS stating that the SLF did not contain any information on sensitive Native American cultural properties within or near the project area.

Tribal Consultation

Consultation Outreach per Public Resources Code Section 21080.3.1

California Public Resources Code (PRC Sections 21080.1, 21080.3.1, and 21080.3.2) require public agencies to consult with the appropriate California Native American tribes identified by the Native American Heritage Commission (NAHC) for the purpose of mitigating impacts to cultural resources. To meet PRC requirements, on May 8th, 2024, SAS emailed a letter and a map depicting the project area and surrounding vicinity to the NAHC requesting a Sacred Lands File (SLF) search, and a list of Native American community representatives who might have an interest in, or concerns with the proposed Project. On May 17th, 2024, the NAHC responded to SAS stating that the SLF did not contain any information on sensitive Native American cultural properties within or near the project area. The NAHC also provided contact information for the following individuals:

- Mr. Greg Sarris, Chair – Federated Indians of Graton Rancheria
- Ms. Bunny Tarin, Tribal Administrator – Guidiville Rancheria of California
- Mr. Michael Derry, Historian – Guidiville Rancheria of California
- Mr. Kenneth Woodrow, Chair – Wuksachi Indian Tribe / Eshom Valley Band

SAS contacted each of the individuals listed above by letter on May 31st, 2024, inquiring if they had any knowledge of culturally sensitive properties or archaeological sites within or near the project area. The Mill Valley School District also contacted these tribal representatives on August 12 and 13, 2025, via email and certified mail to determine if the tribes are requesting formal AB 52 tribal consultation. On August 19, 2025, the Federated Tribes of Graton Rancheria (FIGR or Graton), formally requested consultation with the District with regard to alternatives, mitigation measures, and significant impacts of the proposed Project. None of the other tribal contacts have responded as of November 21, 2025.

The Graton recommended:

1. Tribal cultural resources be preserved through avoidance;
2. Tribal cultural resources be treated with culturally appropriate dignity;
3. Permanent conservation easements be established; and
4. Tribal cultural resources be protected.

Also requested were archaeological maps of the known cultural resources within the proposed Project and Alternatives areas, the results of any record searches, the results of any

archaeological inventory surveys, the results of any Sacred Lands File searches, any ethnographic studies conducted in the proposed Project area, and any geotechnical reports.

The requested documents were provided to Graton on September 8, 2025. A Consultation telecom call was subsequently scheduled and occurred on October 1, 2025. On this call the District described the current status of the Project and alternatives. Graton expressed concerns that they were not consulted with earlier and had questions regarding which of the alternatives were currently under serious consideration for possible approval. Graton also requested that Tribal Cultural Resources be addressed in a chapter separate from Cultural Resources. This section addresses that request. The District also agreed to provide Graton with any available additional studies regarding the Project site. The site geotechnical report was provided to FIGR on October 4, 2025. FIGR representatives subsequently conducted site visits at both the Project site and Edna Maguire/Terra Marin Alternatives sites on October 9, 2025, with District representatives. The District subsequently emailed the Tribe on November 6 and 13 2025 to solicit any comments and concerns. No response has been received from the Tribe as of the date of this Final EIR, and consultation is considered complete.

3.11.2 Impacts and Mitigation Measures

Significance Criteria

To satisfy CEQA requirements, Tribal Cultural Resources impacts were analyzed in accordance with Appendix G of the CEQA Guidelines. According to the CEQA Guidelines, CCR, Title 14, Section 15002(g), "a significant effect on the environment is defined as a substantial adverse change in the physical conditions which exist in the area affected by the proposed project." As stated in CEQA Guidelines Section 15064(b)(1), the significance of an activity may vary with the setting. The impact analysis identifies and analyzes construction (short-term) and operation (long-term) impacts, as well as direct and indirect impacts (see PRC Section 21065). The proposed Project would have significant Tribal Cultural Resources impacts under CEQA if it would:

> Cause a substantial adverse change in the significance of a TCR, defined in PRC Section 21074 that is
>
> (a) listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in PRC Section 5020.1(k);
>
> or
>
> (b) a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision c) of PRC Section 5024.1. In applying the criteria set forth in subdivision c) of PRC

Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Impact Analysis

Impact 3.11.1: Cause a substantial adverse change in the significance of a TCR.

TCRs are defined as resources that are eligible for or listed in the CRHR, or resources that the lead agency determines to be a TCR with a substantial burden of evidence. No TCRs have been identified within the vicinity of the proposed Project.

Proposed Project

Construction

Since no TCRs were identified, impacts on TCRs would only be associated with new and unanticipated discovery of an eligible archaeological resource during construction of the proposed Project. However, the Project site is underlain by an historic burn dump. Further, the Project is subject to state laws, including Health and Safety Code Section 7050.5, that help prevent impacts to TCRs. As such, there is no potential for the Proposed Project to adversely affect any Tribal Cultural Resources, and no impact would occur.

Mitigation Measures

None required.

3.11.3 References

Solano Archaeological Services, LLC, Cultural Resources Technical Memorandum to Grassetti Environmental Consulting, Inc. *Cultural Resources Investigation – Mill Valley Middle School Replacement Project, City of Mill Valley, Marin County, California*. September 23, 2024

C. REVISED HAZARDS, HAZARDOUS MATERIALS, AND WILDFIRE SECTION

The EIR's Hazards, Hazardous Materials, and Wildfire section (Section 3.7) has been revised to incorporate additional soil sampling that was conducted after the publication of the Draft EIR, as well as a revised Human Health Risk Assessment (HHRA) that was prepared incorporating the additional sampling. No new or substantially increased impacts have been identified, and no new mitigation measures are required. The revised chapter does include some clarifications and revisions to the some of the existing mitigation measures. The revisions are shown in underline and ~~strike-through~~, below.

3.7 HAZARDS, HAZARDOUS MATERIALS AND WILDFIRE

This section describes the regulatory framework and existing conditions related to Hazards, Hazardous Materials and Wildfire and analyzes potential impacts that could occur as a result of the Project. The existing site condition description and analysis of potential impacts is summarized from the ~~Draft~~ Human Health Risk Assessment, dated November 17, 2025 (HHRA; see FEIR Appendix D)[1]; as well as the Ecological Health Risk Assessments, and Sea Level Rise Health Risk Assessment that are included in the ~~Draft~~ Preliminary Endangerment Assessment Report (PEA) prepared for the Mill Valley School District by Ninyo & Moore[2]. The PEA is included in Appendix E in this EIR. Health risks from airborne contaminants are addressed in Section 3.2, Air Quality.

Setting

Background

Hazardous Materials and Wastes

Certain chemical and physical properties of substances cause them to be considered hazardous and as a result are regulated under various statutory and regulatory requirements in California. "Hazardous material" is defined in the California Health and Safety Code (Section 25260(d)) as a substance or waste that, because of its physical, chemical, or other characteristics, may pose a risk of endangering human health or safety or of degrading the environment. "Hazardous material" includes, but is not limited to, all of the following:

[1] The November 17, 2025 HHRA incorporates additional sampling that has occurred after publication of the Draft EIR.

[2] The Preliminary Endangerment Assessment (PEA) Report, Mill Valley Middle School, 425 Sycamore Avenue, Mill Valley, California, ~~prepared for the Mill Valley School District April 18, 2025~~ October 16, 2025. The PEA Report incorporates supplemental sampling activities that were performed after submittal of the Draft PEA Report to the California Department of Toxic Substances Control (DTSC) on April 8, 2025 and addresses DTSC comments on the Draft PEA Report.

(1) A hazardous substance, as defined in Section 25281 or 78075(a) of the Health and Safety Code.

(2) A hazardous waste, as defined in Section 25117 of the Health and Safety Code.

(3) A waste, as defined in ~~Section 470 or~~ Section 13050 of the Water Code.

The term "hazardous waste" is a legal term defined in State regulations. California Code of Regulations (CCR) Title 22 specifies that a waste exhibits a characteristic of hazardous waste when it may either: (1) cause, or significantly contribute to, an increase in mortality or an increase in serious irreversible, or incapacitating reversible, illness; or (2) pose a substantial present or potential hazard to human health or the environment when it is improperly treated, stored, transported, disposed of, or otherwise managed (CCR, Title 22, Chapter 10, Article 2, §66261.10(a)). Title 22 establishes four characteristics of hazardous waste: toxicity, ignitability, corrosivity, and reactivity. Hazardous wastes are wastes that exhibit a characteristic of hazardous waste or are listed according to federal and state regulations. A "waste" is a discarded material. (CCR, Title 22, Chapter 11, Article 2, §66261.2).

Hazard Exposure

Exposure to hazardous materials and wastes can arise through transport by air of potentially toxic materials released in gaseous form or as smoke emitted by a fire; transport by animal vectors, such as scavenging birds, rodents, or insects; and transport by surface water or groundwater where hazardous materials leave a site due to leaks, spills, or uncontrolled runoff. Pathways of exposure to a hazardous material or waste depend on the chemical and physical properties of the waste and the type of occurrence or accident that released it. The four common exposure pathways are inhalation, ingestion, direct contact (with skin or eyes), and injection (skin puncture or cut). Factors that influence the health effects of exposure to hazardous materials include the dose to which the person is exposed, the frequency of exposure, the duration of exposure, the exposure pathway, and individual susceptibility. A material may be hazardous by one exposure pathway but not another; for example, a chemical might be toxic if ingested but not if touched.

Effects of Exposure

Health effects of exposure to hazardous materials and wastes can vary greatly and are specific to the chemical composition of each material/waste. Possible health effects of exposure may be acute (immediate, or of short-term severity) or chronic (long-term, recurring, or resulting from repeated exposure). Acute effects, usually resulting from a single exposure, might include burns or injury to body organs or systems such as from exposure to corrosive, reactive, or ignitable materials. Chronic effects, usually resulting from repeated or long-term exposure to a toxic material (as in a poorly ventilated workplace, for example), could also include systemic or organ damage. Chronic toxic effects of particular concern include birth defects and cancer.

Sensitive Receptors

Regarding public health and safety, a sensitive receptor is an individual or population that resides near or encounters a potential health hazard. Schools, hospitals, nursing homes and other similar facilities are considered sensitive receptors.

Regulatory Setting

The use, production, and disposal of hazardous materials and wastes are regulated extensively by federal, State, regional, and local regulations, and guidance, with major objectives of protecting the public health and the environment. These regulations and guidance were developed primarily for application in industrial and manufacturing environments where worker health and safety and waste production as a byproduct of manufacturing occurs. A myriad of laws and regulations at the federal, State, and local levels affect the management of hazardous materials and wastes.

Federal

The U.S. Environmental Protection Agency (EPA or U.S. EPA) is the lead agency responsible for enforcing federal regulations that affect public health and the environment. The U.S. EPA is responsible at the federal level for enforcing regulations pertaining to hazardous waste. The federal Occupational Safety and Health Administration is responsible for worker safety. The Department of Transportation is responsible for hazards in transportation. Hazardous materials for purposes of transportation are listed and classified in 49 CFR 172.101. Regulations governing the use, management, handling, transportation and disposal of hazardous materials and waste are administered by federal, state and local governmental agencies. Federal statutes (and related regulations) governing hazardous materials and waste include the Resource Conservation and Recovery Act of 1976 (RCRA); the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA); and the Superfund Amendments and Re-authorization Act of 1986 (SARA).

The Toxic Substances Control Act of 1976 (15 U.S.C. §2601 et seq) (TSCA) provides the US EPA with authority to require reporting, record-keeping and testing requirements, and restrictions relating to chemical substances and/or mixtures. Certain substances are generally excluded from TSCA, including, among others, food, drugs, cosmetics and pesticides. TSCA addresses the production, importation, use, and disposal of specific chemicals including polychlorinated biphenyls (PCBs), asbestos, radon and lead-based paint.

State

The U.S. EPA delegates much of its regulatory authority to individual states where authorized. In California, the U.S. EPA has granted most enforcement authority over federal hazardous materials regulations to the California Environmental Protection Agency (CalEPA). CalEPA serves as the umbrella agency for six boards/departments: the California Air Resources Board (CARB), the Department of Pesticide Regulation (DPR), the Department of Toxic Substances

Control (DTSC), the Department of Resources Recycling and Recovery (CalRecycle), the Office of Environmental Health Hazard Assessment (OEHHA), and the State Water Resource Control Board (SWRCB) and associated Regional Water Quality Control Boards (RWQCB). State regulations require planning and management to ensure that hazardous materials are handled, stored, and disposed of properly in order to reduce health risks to humans as well as environmental risk.

The DTSC works in conjunction with the U.S. EPA to enforce and implement specific laws and regulations pertaining to hazardous wastes. California legislation, for which DTSC has primary enforcement authority, includes the Hazardous Waste Control Act and the Hazardous Substance Account Act. Most State hazardous waste regulations are contained in Title 22 of the California Code of Regulation (CCR). The DTSC generally acts as the lead agency for soil and groundwater cleanup projects and establishes cleanup and action levels for subsurface contamination that are equal to, or more restrictive than, federal levels.

California worker health and safety regulations related to construction activities are enforced by the California Division of Occupational Safety and Health (CalOSHA). Regulations include exposure limits and requirements for protective clothing and training to prevent exposure to hazardous materials. CalOSHA regulations concerning the use of hazardous materials in the workplace, as detailed in Title 8 of the CCR, include requirements for safety training, availability of safety equipment, implementation and maintenance of accident and illness prevention programs, hazardous substance exposure warnings, and emergency action and fire prevention plan preparation. Title 8 regulations (§3203) include requirements for worker safety training and injury/illness prevention programs contained in Senate Bill 198, which was adopted in 1990. CalOSHA enforces hazard communication program regulations that contain training and information requirements, including procedures for identifying and labeling hazardous substances, communicating hazard information related to hazardous substances and their handling, and preparation of health and safety plans to protect workers and employees at hazardous waste sites.

Under the authority of CalEPA, DTSC and the RWQCBs are responsible for overseeing the remediation of contaminated soil and groundwater sites. The provisions of Government Code 65962.5 (also known as the Cortese List) require the SWRCB, DTSC, the California Department of Health Care Services (CDHCS), and CalRecycle to submit information pertaining to sites associated with solid waste disposal, hazardous waste disposal and/or hazardous materials releases to CalEPA.

Because the site was formerly a landfill, and the proposed redevelopment would involve construction to continue the existing school use atop a landfill site, the California Education Code requires that the DTSC's Brownfields Restoration and School Evaluation Branch review potential environmental concerns related to the project as a condition of the project receiving certain state funding.

DTSC evaluates school sites according to a three-step process, which includes: 1) Phase I Environmental

Site Assessment, 2) PEA, and, if necessary, 3) Response Action. In this instance, the PEA is an investigation to determine if the landfill waste remaining underneath the cover presents a potential risk to human health and the environment. The objectives of the PEA for this project were to:

- Collect subsurface and surface soil, groundwater and surface water, and soil vapor data to develop a conceptual site model (CSM);
- Identify and evaluate the extent of contaminants of potential concern (COPCs);
- Develop a risk assessment to determine if COPCs pose a risk to receptors; and
- Determine the need for response action, which may include remediation and/or mitigation, to facilitate Site redevelopment.

Because the Site is currently a school and the proposed redevelopment of the site would involve construction to continue the existing school uses, the Mill Valley School District (MVSD) entered into an Environmental Oversight Agreement (EOA) with the DTSC in April 2024 for the DTSC to provide oversight of the PEA process and other related activities. DTSC is responsible for overseeing the PEA process and is working in conjunction with the Local Enforcement Agency (discussed below).

County

The Marin County Environmental Health Services Division (MCEHS) is the Local Enforcement Agency (LEA) and, pursuant to delegated authority from CalRecycle, provides regulatory oversight related to landfill regulations and requirements. As the LEA, the MCEHS coordinates and enforces numerous local, state, and federal regulatory programs regarding solid wastes and landfills in the county. The LEA performs quarterly inspections at the 14 closed landfills in Marin County, including the former Mill Valley Dump. The MCEHS also reviews applications for solid waste facility permits or exemptions for completeness and accuracy.[3]

The Site, which is located on a portion of the former Mill Valley Dump, is subject to regulatory oversight of MCEHS, as the LEA. Review of CalRecycle's SWIS database indicates that the Mill Valley Dump (SWIS Number 21-CR-0009) is a closed landfill with a regulatory status of "To Be Determined (TBD)." The landfill is considered a "pre-regulation" site because it stopped accepting waste prior to January 1, 1988. According to inspection records in the SWIS database, the Site has been inspected quarterly by the LEA and/or CalRecycle since February 12, 1996.

Existing Conditions

Existing Site Conditions

The Project site is a roughly rectangular 10.2-acre property located on the northeast corner of Sycamore Avenue and Camino Alto in a mixed residential and commercial/industrial area. Most

[3] The duties of the LEA are discussed in greater detail at https://www.marincounty.gov/sites/g/files/fdkgoe241/files/2024-03/duties-of-the-solid-waste-lead-enforcement-agency-lea.pdf.

of the Site is located within the footprint of the former municipal landfill, the Mill Valley Dump. The site operated as the Mill Valley Dump, a household waste landfill and burn dump from the early 1900s until closing in the 1950s. The dump operated for approximately 50 years, burning waste if possible and spreading the remaining waste across the dump. The historical extent of the dump extends beneath properties located to the north and south of the Site. Prior to landfill operations, the Site was undeveloped tidal marsh. The Project site, except for the southwest corner, overlies landfill waste. Records indicate a cover of sandy clay was installed before the school was built in 1969, to prevent human contact with underlying landfill waste. The purpose of a landfill cover is to isolate the landfill waste and its potential health hazards (i.e. contaminated soil, groundwater, vapors, or landfill gas) such that it does not pose a significant hazard to human or ecological health through direct exposure.

The Project site is currently developed with the MVSD administrative building and Mill Valley Middle School. It includes a large building on the west side of the site and smaller buildings and portable classrooms on the eastern and northern portions of the site. School parking lots are located along the southern and eastern site boundaries, as well as a skate park in the southeast corner and a blacktop play area in the northeast corner of the site. The site surface consists of hardscape (asphalt, concrete and buildings) and landscape areas. A fenced-off drainage channel (known as Ryan Creek) cuts across the northern portion of the site, discharging into the Pickleweed Inlet (known as the Sausalito Canal) to the east of the site. Ryan Creek is completely fenced off and locked to prevent unauthorized access.

In June 2024, Ninyo & Moore conducted a geotechnical and geologic hazard assessment of the Site for the proposed redevelopment. The assessment included advancing 14 soil borings to depths of up to approximately 42 feet below the ground surface (bgs) and advancing five cone penetrometer test (CPT) borings to depths of up to 45 feet bgs. Soil samples were collected from the soil borings for geotechnical laboratory testing including, but not limited to, moisture content, organic content, and pH (Ninyo & Moore, 2024a). Results of the geotechnical assessment indicated that the depth to landfill waste and Bay Mud and lithology thicknesses were generally consistent with observations made during the PEA (as discussed further below). Groundwater was encountered at depths between approximately 2 and 9 feet bgs, except in the southwest corner where no groundwater was encountered.

In November 2024 and summer 2025, Ninyo & Moore conducted PEA investigation drilling and sampling activities and submitted environmental samples to analytical laboratories. Landfill waste associated with the former Mill Valley Dump was encountered across the site extending laterally to at least the northern, eastern, and southern Site boundaries. Depth to the top of the waste prism varied across the site, ranging from approximately 0.5 to approximately 5 feet bgs, but was predominantly encountered at approximately 1 to 1.5 feet bgs across the site. The thickness of the waste varies, ranging from approximately 2 feet thick to approximately 14.5 feet thick, with the greatest thickness in the center of the site and thinning to the east and west. The

waste is generally encountered from approximately 0 to 10 feet above mean sea level and is underlain by Bay Mud.

Soil samples were analyzed for the following Contaminants of Potential Concern (COPCs):

- ~~178~~ 188 soil samples were analyzed for total metals. Of the ~~178~~ 188 samples, 91 samples had total metal concentrations that exceeded the numerical value that indicated further analysis pursuant to the Waste Extraction Test or Toxicity Characteristic Leaching Procedure was warranted. Such samples were analyzed further for antimony, arsenic, barium, cadmium, chromium, copper, lead, nickel, mercury, and zinc.
    - Additionally, ~~27~~ 31 of the ~~178~~ 188 samples were analyzed for hexavalent chromium (CrVI) to differentiate between trivalent chromium and hexavalent chromium.
- 165 soil samples were analyzed for total petroleum hydrocarbons (TPHg) and volatile organic compounds (VOCs).
- 164 soil samples were analyzed for:
    - TPH as diesel (TPHd) and TPH as motor oil (TPHmo); and
    - Polycyclic aromatic hydrocarbons (PAHs).
- ~~43~~ 53 soil samples were analyzed for dioxins.
- 29 soil samples were analyzed for:
    - Organochlorine pesticides (OCPs); and
    - Polychlorinated biphenyls (PCBs).
- 7 soil samples were analyzed for asbestos.

The PEA analytical results indicate COPCs consist of metals, petroleum hydrocarbons, polycyclic aromatic hydrocarbons (PAHs), and dioxins in soil; metals and petroleum hydrocarbons in groundwater; and volatile organic compounds (VOCs) in soil vapor. COPC-impacted soil is primarily detected within the landfill waste prism and is heterogeneously distributed both laterally and vertically at the site. The COPC impacts to soil appear to be vertically delineated by the Bay Mud. The highest concentrations of metals in COPC-impacted groundwater are primarily located in the central portion of the site. Surface water was slightly impacted with lead and petroleum hydrocarbons in samples collected from the eastern half of Ryan Creek near Camino Alto.

A Human Health Risk Assessment (HHRA) was performed (see FEIR Appendix D) to evaluate potential health impacts associated with theoretical exposure to chemicals detected in soil and

soil vapor beneath the site.[4] Current regulatory guidance requires risk assessments to be health-protective in nature and could overestimate potential health risk at the site based on current and proposed site use. The HHRA does not account for any mitigation measures that would be implemented as part of a project. Therefore, actual risks associated with conditions evaluated and conclusions drawn in the HHRA are likely to be lower than those described therein. The HHRA addressed airborne and non-airborne (ingestion and dermal contact) risks of hazardous materials present at the landfill. The airborne health risks associated with construction of the Project are described in the Air Quality section of this EIR.

Two scenarios were evaluated in the HHRA. The first scenario evaluates current potential risk to school receptors (staff and students) based on potential exposure scenarios related to current Site conditions and the proposed project (i.e., school use). The second scenario adopts a more conservative risk evaluation by considering potential risk for future hypothetical residential users at the site[5]. The exposure pathways evaluated consisted of inhalation of ambient air potentially impacted by airborne dust, incidental ingestion of, and dermal contact to, COPC-impacted soil, and inhalation of COPC-impacted soil vapor in indoor air.

Based on the PEA and the HHRA, which are summarized below by source, Ninyo & Moore will prepare a Mitigation Plan in consultation with DTSC and/or the LEA. Ninyo & Moore will also prepare a Post Closure Land Use Plan (PCLUP) under the LEA's oversight. The Mitigation Plan and PCLUP will address necessary measures to facilitate proposed site redevelopment and ensure safe occupancy given the COPCs identified in soil and soil vapor. The PCLUP is discussed in the Impacts/Mitigations section of this chapter.

Existing Human Health Risks at the Site

Health Risk Assessment Assumptions

As discussed above, an HHRA was prepared to determine the potential risk of health hazards that may result from theoretical exposure to contaminants at the site. The HHRA evaluates the properties of the COPCs and the pathways by which site receptors may potentially be exposed. The objective of the HHRA was to determine whether concentrations of COPCs in soil and soil vapor represent a potential threat to current and future on-site receptors.

Current regulatory guidance requires risk assessments to be health-protective in nature and could overestimate potential health risk at the site based on current and proposed site use. For the

[4] The HHRA used to evaluate the project includes soil vapor samples from across the Site because the project proposes to demolish the existing buildings and rebuild. The PEA, which evaluates current conditions with the existing building footprints, evaluates sub-slab vapor from samples obtained directly beneath the building foundations.

[5] Although there are no plans for residential use at the Site, a residential use assumption is more conservative due to assumptions related to exposure pathways and length of exposure (both per day and over the course of many years).

future redevelopment scenario, the HHRA assumes residential use, which provides a more conservative risk evaluation than what would be required for the anticipated site use. Therefore, actual risks associated with conditions evaluated in this HHRA are likely to be lower than those described herein. Assumptions built into the HHRA include:

- Evaluation of hypothetical future residential scenario; which assumes residents are present 24 hours per day, 350 days per year for a total of 26 years (20 for adults, and 6 for children); even though current and proposed uses are for a school;
- Calculations use maximum COPC concentrations instead of site averages;
- Calculations assume direct exposure to maximum COPC concentrations without mitigation measures;
- Calculations assume COPC concentrations are constant and continuously released and ignore some fate and transport mechanisms and natural degradation (e.g., an assumption is made that a VOC reservoir underlies the site that is unlimited in concentration continuously releases vapors for up to 26 years); and
- Conservative assumptions were used in the vapor intrusion risk calculations.

All conclusions and recommendations presented in the HHRA are based on reported COPC concentrations and the current use of the site as a middle school and the hypothetical future land use of the site as residences. In this risk assessment, all fate-and-transport models, parameters, toxicity data and assumptions were applied in accordance with federal and State regulatory guidelines. These guidelines are meant to protect the public and tend to overestimate potential health risk. The Residential Scenario provides the most conservative assessment in regards to the potential receptors (adults and children within first 6 years of life) and exposure timeframe. Assumptions used to assess health risks related to vapor intrusion are considered protective of public health, and are used for initial screening of sites in California. As such, this risk assessment provides an estimate of the upper boundary of potential health risk, rather than an accurate representation of true health risk posed by the site.

Screening Levels for Arsenic and Lead

The site-specific soil arsenic background (i.e., naturally-occurring) concentration has been determined to be 15 mg/kg (which is above the DTSC residential screening level). This site-specific background concentration is generally consistent with DTSC-conducted studies of California soils. Arsenic was detected above the site-specific background level in 27 soil samples at concentrations ranging from 15 mg/kg to 230 milligrams/kilogram (mg/kg) at depths ranging from 0.5 feet below ground surface (bgs) to 15 feet bgs. The ground surface above shallow soil samples with arsenic exceedances is covered by the landfill cover (e.g., arsenic exceedances in shallow soil are beneath ~~under~~ landscaping or under a paved area), thus mitigating potential direct exposure to elevated arsenic concentrations in shallow soil to current site receptors. There were no arsenic detections exceeding the Site-specific background level in

surface samples. Additionally, the calculated 95% upper confidence limit (UCL) of arsenic within surface and shallow soil is 10 mg/kg, which is also below the Site-specific background level.[6] Since some arsenic concentrations exceed the site-specific background concentration, there may be potential risk associated with arsenic in site soil to on-site receptors if not mitigated.

DTSC indicates that for lead, concentrations should be compared to the residential DTSC level of 80 mg/kg to evaluate if potential risk associated with lead is present. Lead was detected above the DTSC Screening Level (SL) of 80 mg/kg in ~~38~~ 37 soil samples at concentrations ranging from 92 mg/kg to 23,000 mg/kg at depths ranging from ~~0.5 feet bgs~~ the ground surface to 15 feet bgs. The ground surface above buried waste ~~consists of landfill cover or cap~~ and the ~~shallow soil samples with lead exceedances are covered by landfill cover~~ soil samples with the highest lead concentrations is landfill cover (e.g., lead exceedances are beneath landscaping or under a paved area) which prevent contact with underlying soils. The calculated 95UCL of lead[7] within surface and shallow soil is 61 mg/kg, which is below the DTSC screening level. Since some samples exceed the soil screening level for lead, there may be potential risk associated with lead in site soil at depth if not mitigated.

Cancer Risks and Hazards Index for Multi-pathway Soil Exposure

Cancer risks and hazard indexes from multi-pathway soil exposure (including incidental soil ingestion, dermal contact, and fugitive dust inhalation) were evaluated in the HHRA using the maximum detected concentrations of COPCs.

The incremental cancer risks estimated for the ~~current school exposure~~ proposed project (i.e., school exposure scenario) were lower than the cancer risk benchmark established by DTSC for students but slightly above the benchmark for staff. However, the incremental cancer risks estimated for staff are within the risk management range of 1E-04 and 1E-06. Risks lower than 1E-06 are generally considered acceptable.[8] By comparison, risks that exceed 1E-04 are generally considered unacceptable.

- ~~2~~ 4 in a million (~~2~~ 4E-06) for School Staff (HHRA Table ~~J~~ 6).
- ~~0.4~~ 0.7 in a million (7E-07) for School Students (HHRA Table 6).

The hazard indexes estimated for the school exposure scenario were less than 1 such that the chemicals detected do not pose a current health hazard to staff and students:

[6] The UCL calculation demonstrates that, with 95% confidence, arsenic concentrations are at or below 10 mg/kg in surface and shallow soil.
[7] The UCL calculation demonstrates that, with 95% confidence, lead concentrations are at or below 61 mg/kg in surface and shallow soil.
[8] *E.g.*, DTSC, Human Health Risk Assessment (HHRA) Note Number 3, DTSC-modified Screening Levels (DTSC-SLs), revised Apr. 2025 (identifying target risk level of $1x10^{-6}$ (one in one million) and a target hazard quotient value of 1.0).

- ~~0.2~~ 0.3 for School Staff (HHRA Table ~~J~~ 6).
- ~~0.3~~ 0.4 for School Students (HHRA Table ~~J~~ 6).

The incremental cancer risks estimated for the hypothetical residential exposure scenario were:

- ~~100~~ 40 in a million (4E-05) for Adult and Child Residence (HHRA Table 6 ~~7~~).

The hazard index estimated for the hypothetical residential exposure scenario is:

- ~~60~~ 70 for Child Residence (HHRA Table 6 ~~7~~).

Based on the above, the HHRA concluded as follows:

- Arsenic was detected in soil at concentrations greater than the Site-specific background concentration of 15 mg/kg, and lead was detected in soil at concentrations greater than the DTSC's screening level of 80 mg/kg, which could pose a potential risk without mitigation.
- ~~There is not a risk of direct exposure to elevated arsenic and lead concentrations in the soil to current site receptors due to the site's existing cover.~~
- 95UCL calculations show that arsenic and lead concentrations in the top foot of soil are below applicable screening levels. The site's existing cover prevents site users from direct exposure to elevated arsenic and lead concentrations in soil.
- Exposure to other COPCs detected in shallow soil (0 to 1-foot bgs) do not pose a health hazard for current staff and students for direct exposure (Table 6).
- The incremental cancer risk estimated for the school students is below the 1E-06 benchmark (Table 6).
- The incremental cancer risk estimated for the school staff slightly exceeds the 1E-06 benchmark when based on the maximum dioxin TEQ and using the toxicity from the most toxic of the dioxins. However, under a more realistic exposure scenario that uses the 95UCL dioxin TEQ for shallow soils (8.93 pg/g), the estimated cancer risk for school staff is 1E-06, which is equal to the DTSC's benchmark of 1E-06 and therefore considered acceptable.
- Exposure to maximum concentrations of COPCs detected in soil within the landfill waste could, if not mitigated, pose a cancer risk and/or health hazard to the hypothetical residential receptor (HHRA Table 7).

Cancer Risks and Hazards Index for Soil Vapor Intrusion (Indoor Air Inhalation)

Incremental cancer risks from soil vapor (inhalation of indoor air) were evaluated in the HHRA, using the maximum detected VOC concentrations.

The incremental cancer risks estimated for the ~~current~~ school exposure scenario were:

- ~~0.4~~ Four in a million (4E- ~~07~~ 06) for School Staff (HHRA Table ~~J~~ 11).

- ~~.006~~ 0.3 in a million (3E-07) for School Students (HHRA Table ~~J-~~ 12).

The hazard index estimated for the school exposure scenario were:

- ~~.01~~ 0.7 for School Staff (HHRA Table ~~J-12~~ 8).
- ~~.006~~ 0.5 for School Students (HHRA Table ~~J-8~~ 9).

The cancer risks estimated for the hypothetical residential exposure scenario were:

- 20 in a million (2E-05) for Adult and Child Residence (HHRA Table ~~J-~~ 11).

The hazard index estimated for the hypothetical residential exposure scenario were:

- 3 for Child Residence (HHRA Table ~~J-13~~ 10).

Based on the above, the HHRA had the following soil vapor health risk conclusions:

- VOCs detected in soil vapor do not pose a health hazard for current students or school staff for indoor air exposures (HHRA Tables ~~J-8 and J-9~~ 8 and 9).
- The incremental cancer risk estimated for school students is ~~slightly above~~ below the 1E-06 benchmark for indoor air exposures established by DTSC and therefore is considered acceptable (HHRA Table ~~J-~~11).
- The incremental cancer risk estimated for school staff is slightly above the 1E-06[9] benchmark for indoor air exposures, based on maximum concentrations from a soil vapor probe not near any buildings and an assumed exposure duration of 25 years (HHRA Table11)
- For the hypothetical residential receptor, indoor air exposures to VOCs detected in soil vapor could, if not mitigated, pose a health hazard and a cancer risk (HHRA Tables 10and13).

The incremental cancer risk estimated from soil vapor for the school student receptors is below the benchmark value of 1E-06 (HHRA Table ~~J-12~~ 12) and is considered acceptable. The cancer risk estimated for school staff is slightly above the 1E-06 benchmark, which is within the EPA's risk management range (HHRA Table 11). The hypothetical residential receptors exceeded the 1E-06 benchmark and is within the U.S. EPA's risk management range. The risk driver for the exceedance for school staff was ethylbenzene (HHRA Table 11), based on a detection from a soil vapor probe that is located in the northeastern portion of the site, beneath a blacktop recreation area not near any school buildings, and an assumed exposure duration of 26 years. The risk drivers for the hypothetical residential exposure scenario were benzene, ethylbenzene, and naphthalene (HHRA Table 13).

[9] A calculated incremental risk of 4E-06 corresponds to an incremental risk of 4 in 1,000,000 as compared to the acceptable risk of 1 in 1,000,000 and is at the lower end of the EPA risk management range.

The risk and hazard calculations assumed multiple exposures to chemicals via incidental soil ingestion, dermal contact, outdoor inhalation, and inhalation of indoor vapors in accordance with USEPA and DTSC guidance. The results are based on multiple health-protective assumptions. For example, it was assumed that a VOC reservoir is located under the site and that this VOC reservoir is unlimited in concentrations that are continuously released as vapors for up to 26 years.

Groundwater Exposure

The groundwater exposure pathway is incomplete and does not present a risk because there is no domestic or industrial use of groundwater from the Project area.

Existing Ecological Risks at the Site

Ninyo & Moore conducted a qualitative Screening-Level Ecological Risk Assessment (ERA) for the site. The objectives of the ERA were to:

- Evaluate potential threat posed by COPCs detected in soil at the site to ecological receptors that may visit the site now or in the foreseeable future.
- Evaluate the potential threat posed by COPCs detected in surface water and groundwater at the site to ecological receptors that may utilize native habitats in the vicinity of the site.
- Evaluate soil sample data to ensure it meets current DTSC and EPA data quality objectives for a risk assessment.

The site is developed with the MVMS and does not support native vegetation or provide native habitat for wildlife. The future use of the site will remain a school and is not planned for open space use. Therefore, there does not appear to be a significant soil pathway of exposure to ecologically sensitive receptors. However, one area of the site that may potentially be utilized by ecological receptors is limited to Ryan Creek. The tidally influenced creek receives water from the upgradient watershed drainage through a culvert located at the western end of the creek and from the Pickleweed Inlet during high tide. Except during high tide, the banks of the creek are exposed. Groundwater at the site is presumed to be tidally influenced and the Richardson Bay shoreline is located approximately 100 feet east of the site. Thus, there is a potential groundwater exposure pathway for aquatic plants and animals living within the shoreline area to come in contact with COPC-impacted groundwater migrating from the site.

Results of the ERA indicate that:

- The soil exposure pathway to ecological receptors across the site (excluding Ryan Creek) is considered incomplete. Therefore, COPCs detected within the school grounds do not pose a potential threat to ecological receptors.

- ~~Surface soil~~ Sediment samples collected from the bank of the Ryan Creek indicating that ~~total dioxins~~ chromium, copper, lead, nickel, mercury, vanadium, and zinc detected in Ryan Creek sediment could pose a potential threat to ecological receptors.
- Maximum concentrations of COPCs in surface water and groundwater may pose a potential threat to ecological receptors at the native tidal marsh habitats adjacent to the site.

Sea-Level Rise Assessment (SLRA)

Ninyo & Moore evaluated the current site conditions using a potential future sea level rise (SLR) scenario in the preparation of the ~~Draft~~ PEA (Ninyo & Moore, 2025) to determine if the site would be impacted by sea level rise and/or groundwater rise resulting from rising sea levels in the near-term (2020-2050) and mid-term (2060-2100). This discussion summarizes that assessment.

The scenarios presented in the SLRA do not account for any increase in site elevation or any other potential SLR mitigations, including local and/or regional mitigations[10]. The projected SLR scenarios are obtained from the California Ocean Protection Council's (OPC's) State of California Sea Level Rise Guidance: 2024 Science and Policy Update (OPC, 2024). The SLR scenario selected for this assessment was the Intermediate- High Scenario. Because the current and future uses of the Site are a middle school, the intermediate-to-high scenario provides a relatively high-risk aversion for a near-term timeframe (2030, 2040, and 2050) and a mid-term timeframe (2100; OPC, 2024).

The current Site topography sits at an elevation of approximately 15 to 17 feet above mean sea level (amsl) on the west side and gently slopes to approximately 7 feet amsl on the east side. Based on a review of Federal Emergency Management Agency (FEMA) flood hazard maps, the site is located within the 500- year flood zone (FEMA, 2016). During the PEA investigations, groundwater was encountered between 3 and 12 feet bgs. Depending on the location at the site, COPC-impacted waste can be submerged from approximately 0.5 foot to 8.5 feet below the water table.

The study concluded that in scenarios of over 1 foot of sea-level rise (estimated to start in 2050), COPCs that were previously only saturated during high tide and storm surge events, may now be permanently submerged and potentially increase the leaching of chemicals into groundwater and subsequently mobilizing contaminants. As sea level continues to rise, by 2060, the northeastern corner of the parking lot on the east side of the school would be permanently inundated with water. Any shallow contaminants may become saturated and mobile. This would continue and by 2080, the groundwater table would have risen approximately 3 feet and all areas where

[10] As part of the proposed redevelopment project, at least parts of the site's current grade are planned to be raised through placement of clean fill material.

groundwater is currently encountered at 3 feet bgs, would be inundated. COPCs that previously had not been in contact with groundwater would now be saturated. By 2100, with nearly 5 feet of sea-level rise, almost all COPCs at the site would be saturated and any underground infrastructure and utilities would be in contact with brackish water.

Impacts of groundwater rise associated with SLR could include submerging COPC-impacted waste that was previously above the water table and potentially increasing the concentration of contaminants that could leach to groundwater, and increasing the mobilization of contaminants. Groundwater rise would result in a reduction or elimination of the vadose zone, potentially pushing COPC-impacted soil vapor closer to the surface.

If left unmitigated and unaccounted for, SLR may result in negative impacts to the site that may lead to increased environmental concerns and issues at the Site, primarily associated with groundwater and soil vapor. As described in the Hydrology section of this EIR, SLR flooding impacts at the Site would be reduced through the Project's proposed raising the portions of the Site proposed for buildings, paving, and landscaping. Any mitigation for SLR impacts at the Site related to rising groundwater must be addressed through collaboration with multiple stakeholders because the historical footprint of the landfill expands beyond the Site boundaries and is overlain by multiple properties with different owners. SLR is a regional issue and would also likely affect neighboring properties. It should be noted that impacts of the environment on the Project are not considered potentially significant under CEQA.

Hazardous Materials in School Buildings

Two studies have been conducted with respect to hazardous materials in the existing MVMS Main Building, which is proposed for demolition under the Project. A Limited Destructive Pre-Demolition Hazardous Materials Survey for Building M and four portable buildings at the school was conducted in January 2025 (SCA 2025) and a Pre-Demolition Hazardous Building Materials Survey was conducted for the Main Building at the school in July 2024 (SCA 2024). These reports are included in Appendix E to the DEIR. It should be noted that Building M and the associated portable buildings are not proposed for demolition with the proposed Project.

The purpose of the sampling was to determine the presence of regulated and/or potentially hazardous building materials in the structures prior to the proposed Project described previously. Materials addressed in the sampling included:

- Asbestos-containing materials (ACMs) and asbestos-containing construction materials (ACCMs);
- Lead in coatings and building materials;
- PCBs in building materials and lighting ballasts;
- Mercury-containing fluorescent tubes; and

- Freon in AC units.

These studies found that:

- Certain existing building components or materials in the Main Building and Building M were identified or presumed to contain asbestos in concentrations >1.0% and require abatement prior to demolition.
- Painted or coated surfaces in the Main Building and Building M were identified to contain lead.
- PCB-containing fluorescent light ballasts are assumed present and associated with fluorescent fixtures in the Main Building and Building M.
- Mercury-containing lamps are present throughout the structure and associated with fluorescent fixtures in the Main Building structure.
- Air conditioning (AC) units with Freon are present in the Main Building structure.

Wildfire Risks

The Mill Valley Fire Department is responsible for providing emergency fire and medical response, as well as fire prevention services. To quantify potential risk from wildland fire, Cal Fire has developed a Fire Hazard Severity Scale that uses three criteria (fuel loading, fire weather and topography) to determine fire hazard severity. No portions of the Project Site are located on lands classified as Very High Fire Hazard Severity Zones (VHFHSZ) (CalFire, 2021).

Impacts and Mitigation Measures

Significance Criteria

Appendix G of the *CEQA Guidelines* states that a Project would result in a significant impact to Hazards, Hazardous Materials and Wildfire if it would:

- Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials;
- Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment;
- Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school;
- Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or environment;
- For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, result in a safety hazard or excessive noise for people residing or working in the project area;

- Impair implementation of or physically interfere with an emergency response plan or emergency evacuation plan; or
- Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.

Topics with No Impact

The Project is not located within an airport land use plan area or within two miles of a public airport or airstrip. Therefore, the Project would have no impact from safety hazards for people working at the Project Site, nor would it present a hazard to airport operations.

The Project Site would not impair or physically interfere with an adopted emergency response plan or evacuation plan. The Project would continue to include emergency access from Sycamore Drive, as at present and any incremental traffic increase would be insufficient to interfere with any evacuation plan or otherwise require modification of any existing evacuation routes.

The Project Site is not in a High or Very High Fire Hazard Severity Zones (VHFHSZ), and, as a replacement school on the same site as the existing school, would have no effect on wildfire fire risks.

These topics are not further discussed in this analysis.

Impact Analysis

Impact 3.7.1: Project construction activities would use materials and fuels considered hazardous, and regular landscape maintenance of the Project site would likely involve the use of hazardous chemicals. (Less than Significant)

Construction Impacts

Project construction activities could involve the use, transport, and disposal of hazardous materials such as gasoline, diesel fuel, oils, lubricants/greases, paints, solvents and other hazardous substances that are typical for construction activities. Any release of hazardous materials can occur during construction of any project and releases are typically minor spillages of motor vehicle fuels and oils and other substances used for heavy equipment or release of paints, solvents and glues. These accidental releases can result in health and environmental impacts. Spills of hazardous materials on construction sites are typically handled by the construction contractors and are localized and cleaned up in a timely manner. The disposal, use, handling, and storage of hazardous materials during construction would occur in accordance with applicable Federals, State and local laws including CalOSHA requirements. Additionally, contractors are required to comply with any Project-specific Best Management Practices (BMPs)

during construction. Therefore, any potential threatening health and environmental impacts from hazardous materials during construction of the Project would be a **less-than-significant** impact.

Operational Impacts

Project operation activities could involve the use, storage, and disposal of hazardous materials such as for landscape maintenance chemicals (i.e., commercial herbicides, pesticides, fertilizers, etc.). No fuel or diesel for operational vehicles would be stored on-site. Any hazardous materials or chemicals that would be stored at the Project site for operational maintenance use are required to be stored according to the manufacturer's recommendations. Compliance with County requirements as well as Federal, State and manufacturer requirements for the storage, use, handling and disposal of hazardous materials would significantly reduce the potential threat of accidental release of hazardous materials that could potentially result in health and environmental impacts. Therefore, any potential threatening health and environmental impacts from hazardous materials during operation of the Project would be a **less-than-significant** impact.

Mitigation Measures

None required.

Impact 3.7.2: The Project could expose students and staff at the Interim Campus to hazardous materials/health risks during construction of the Permanent Campus. (Less than Significant with Mitigation)

As described in the Setting section above, the Project site is underlain by the former Mill Valley Dump, which contains landfill waste impacted with COPCs and has resulted in contamination of soil and soil vapor with hazardous materials at levels exceeding conservative screening thresholds in on-site sampling. Construction of the new school may expose students and staff at the Interim Campus to health risks from these substances.

Airborne health risks from construction-generated dust are evaluated in the Air Quality section of this EIR. Potential for health risks associated with direct contact to contaminants in soil is mitigated by the fact that most of the area proposed for modular buildings is capped with asphalt, thereby preventing exposure.

The potential for soil vapor intrusion into the proposed Interim Campus modular buildings would be reduced to less-than-significant levels by natural ventilation below the modular buildings and potential use of the HVAC system with fresh, outdoor air entering the modular buildings. Indoor air methane monitoring is required by the LEA and would continue to occur to assure that students and staff are not exposed to potentially hazardous levels of methane.

Potential exposure to contaminated surface waters in Ryan Creek would be reduced to **less than significant** levels by the existing fencing off of the creek and the stabilization of the creek banks to cover

exposed landfill waste.

Other pathways for potential adverse health effects from these contaminants are direct exposure and ingestion. This potentially significant impact would be mitigated to a **less-than-significant** level by implementation of **Mitigation Measure 3.7-1**, below. Mitigation 3.7-1 requires implementation of the Post Closure Land Use Plan (PCLUP), which ensures that there are no unacceptable health risks to students and staff.

Groundwater contamination beneath the site does not pose a significant hazard because groundwater underlying the Project area is not used for domestic purposes.

Mitigation Measures

Mitigation Measure 3.7-1. The Project Site shall be subject to mitigation as required by DTSC and/or the LEA in the ~~Response~~ Mitigation Plan and/or the Post Closure Land Use Plan (PCLUP). The PCLUP shall include construction safety protocols and requirements, including preparation of a Health and Safety Plan, a Community Air Monitoring Plan, and measures for safe excavated waste handling. The PCLUP will also specify foundation design for the Interim Campus.

In addition, the following measures shall be implemented to protect students and staff from contact with hazardous materials in the soil:

- To the maximum extent feasible, grading and soils work shall be conducted during the summer months when no students, and minimal staff are present.
    - The noise wall specified in Mitigation 3.9-2 shall be constructed prior to any earthwork being initiated.
    - All work areas shall be fenced to prevent unauthorized access.
    - All unpaved areas on the interim campus to which students may have access shall be capped with asphalt or clean soil prior to student occupancy.
    - Construction best management practices such as wetting of all soils during earthwork and other soil disturbing activities, covering of stockpiles, and other methods to minimize generation of fugitive dust.
    - Continuous real-time air and dust monitoring shall be conducted on an ongoing basis during construction activities.
    - Soil Management Plan (SMP) or equivalent document shall be prepared by a qualified environmental consultant to ensure contaminated soils within the construction grading footprint are properly identified, excavated, and managed in accordance with applicable regulations, including for off-site disposal. The SMP shall be implemented during any grading, excavation, or other soil disturbance work. Elements of the SMP shall include:

- A qualified environmental consultant shall be present on the Project site during grading, excavation, and/or other soil disturbance activities in the known or suspected locations of landfill wastes and/or contaminated soils. The environmental consultant will monitor compliance with the SMP and actively monitor the soils and excavations for evidence of contamination.
- The SMP shall require the timely testing and sampling of soils so that contaminated soils can be properly managed. The SMP shall specify the testing parameters and sampling frequency.
- During the Project's soil disturbance phase, the District's construction contractor shall remove and properly dispose of contaminated materials in accordance with the provisions of the SMP. If soil is stockpiled prior to disposal, it will be managed in accordance with the Project's SMP and Storm Water Pollution Prevention Plan (SWPPP), prior to its transfer for disposal. All contaminated soil shall be properly disposed of.
- Contaminated soils transported from the Project site shall be transported by an appropriately licensed transporter and disposed of at an authorized disposal or treatment facility.

Impact 3.7.3: The Project could expose students and staff at the Permanent Campus to hazardous materials/health risk during school operations. (Less than Significant with Mitigation)

As described above in the Setting section, the site is underlain by contaminated soil and groundwater, which have resulted in potential for adverse health risks to future site receptors if not mitigated. Airborne health risks associated with this contamination are addressed in the Air Quality section of this EIR. Other exposure pathways for potential adverse health effects to future site receptors are direct exposure and ingestion.

The Project proposes to cap all areas of the site with paving, building foundations, and/or clean fill. Capping eliminates the potential direct exposure and ingestions pathways to future site receptors. Potential for soil vapor intrusion into the proposed new school buildings would be reduced to less-than-significant levels by incorporation of a Vapor Intrusion Mitigation System (VIMS), which may consist of required soil vapor barriers, sub-slab ventilation, and other components, which have been incorporated into the Project design. Operation, monitoring, and maintenance as directed by DTSC and the LEA would occur as part of the Project to assure that future students and staff are not exposed to COPC-impacted soil vapor indoors at levels that present health risks. **Mitigation 3.7-2**, implementation of the Post Closure Land Use Plan (PCLUP) as it applies to the Permanent Campus would assure that this impact would be reduced to a **less-than-significant** level.

Potential exposure to contaminated surface waters in Ryan Creek would be reduced to **less than significant** levels by the existing fencing off of the creek and the stabilization of the creek banks to cover exposed landfill waste.

Therefore, this impact would be **less-than-significant with Mitigation**.

Mitigation Measures

Mitigation Measure 3.7-2. ~~The District shall undertake additional sampling of soil in landscape areas at 0 and 0.5 feet bgs to further characterize the soil cover at the site. To further characterize potential risk associated with vapor intrusion to indoor air, particularly to school staff, t~~ The District shall conduct another round of sub-slab vapor sampling. ~~if warranted, based on the results of additional air sampling~~ The sample results shall be incorporated into ~~the Final PEA~~ an updated HHRA, upon which the Mitigation Plan and/or PCLUP shall be developed.

The District shall prepare and implement a Mitigation Plan and/or PCLUP for the Project Site in consultation with DTSC and/or the LEA that ensures that potential risks are managed in accordance with environmental agency regulations, standards and guidance such that, with mitigation measures (if any), risks are below the benchmark thresholds. The Project Site shall be subject to mitigation as required by the Mitigation Plan and/or the Post Closure Land Use Plan (PCLUP) that will ensure that, with mitigation measures (if any), health risks are below the benchmark thresholds. The PCLUP shall include construction safety protocols and requirements, including preparation of a Health and Safety Plan, a Community Air Monitoring Plan, and measures for safe excavated waste handling. The PCLUP will also specify foundation design for the Interim Campus.

These Plans shall include, at a minimum, placement of an effective cap over the disturbed portion of the landfill, installation of a VIMS, and land use restrictions. These plans shall also include requirements for post-closure maintenance and monitoring including monitoring and inspection specifications and frequencies, cap-integrity measures, and drainage and erosion control measures.

For new buildings, the Project shall install a passive VIMS with the option to be converted to active, which shall include, at a minimum:

- A geomembrane or equivalent system with low permeability to landfill gas and VOCs shall be installed between the concrete floor slab of the building and subgrade.
- A permeable layer of open graded material of clean aggregate with a minimum thickness of 12 inches shall be installed between the geomembrane and the subgrade and slab.
- A geotextile filter shall be utilized to prevent the introduction of fines into the permeable layer.
- Perforated venting pipe shall be installed within the permeable layer, and shall be designed to operate without clogging.
- The venting pipe shall be constructed with the ability to be connected to an induced draft exhaust system.

- Automatic methane gas sensors shall be installed within the permeable gas layer, and inside the building to trigger an audible alarm when methane gas concentrations are detected above an established threshold.

For existing buildings, the Project shall install a sub-slab depressurization system, which may vary in design but shall include, at a minimum:

- Sub-slab suction points with piping sealed to the slab with air-tight fittings and/or durable sealing material.
- Sealed floor and wall cracks.
- Blowers to depressurize the subsurface below the foundation and aboveground piping to exhaust sub-slab vapor above the building roof.

Impact 3.7.4: The Project could expose ecological receptors to hazardous materials during construction. (Less than Significant)

As described in the Setting section, the ~~Draft~~ ERA included in the PEA found that existing site contamination could expose ecological receptors (i.e., fish and wildlife) to hazards associated with detected COPCs. The primary hazard area would be to fish and wildlife in Ryan Creek. The proposed project would not involve any construction near or in Ryan Creek, and all construction materials and excavated materials also would not be near the creek. Stockpiled excavated materials would be securely tarped to avoid airborne dust being deposited in the creek and elsewhere off site (see Air Quality Section). Therefore, the Project would have a **less-than-significant** significant impact to health risks to ecological receptors.

Mitigation Measures

None required

Impact 3.7.5: Demolition of the Main Building could expose workers and nearby students and staff to hazardous materials. (Potentially Significant but Mitigable)

As described in the Setting section above, the Main Building was evaluated for potentially hazardous building materials and found to contain asbestos-containing materials (ACMs), polychlorinated biphenyls (PCBs), lead-based paints, (LBP) mercury-containing fixtures, and Freon in the AC system. During demolition, workers, students, and staff may be exposed to dust or airborne particulates and vapors from these various contaminants, which could pose a health risk. This impact would be reduced to a less than significant level by implementation of **Mitigation Measures 3.7-4 through 3.7-7,** below.

Mitigation Measures

Mitigation Measure 3.7-4. Asbestos Containing Materials. Prior to any renovations or demolition, all ACMs identified in the 2025 SCA Report that are subject to damage or which will be made friable shall be removed by qualified removal experts using appropriate equipment and

methods as required by the BAAQMD and the Asbestos National Emissions Standards for Hazardous Air Pollutants (NESHAP).

Mitigation Measure 3.7-5. Lead-Based Paint and Construction Materials. Dust control procedures shall be required during demolition/renovation of elements with any measurable lead content to comply with the Cal/OSHA regulations under 8 CCR 1532.1.

As lead was identified in most paints and a detailed inventory of paints was not performed for the project, for the purpose of complying with the Cal/OSHA lead in construction regulation (8 CCR 1532.1), all coated surfaces shall be considered to contain some lead and require demolition dust control procedures for compliance with Cal/OSHA's Construction Lead Standard under 8 CCR 1532.1. The aforementioned regulation contains requirements for lead air monitoring, work practices, respiratory protection, etc., that are triggered by the presence of even very low levels of lead.

In addition, based on the California TTLC hazardous waste standard, some paints, ceramic tiles, and other building materials may be classified as hazardous wastes. These materials shall be segregated from the general demolition debris, characterized, and managed in accordance with applicable federal and state laws and regulations.

Additional sampling and analysis for leachable lead content by the Contractor during demolition will be required for waste characterization if sampled material has a total lead concentration equal to or above 50 mg/kg. Disposal of these materials may be as RCRA or California hazardous waste based on the results of analytical waste characterization data.

None of the applicable regulations require removal of lead paint prior to renovation if the paints are securely adhered to the substrates (i.e., non-flaking or non-peeling). Disposal of the demolition debris in this case can be handled as non-hazardous waste after the loose and flaking paint have been removed, as long as demolition practices do not compromise worker safety and the waste stream is verified by the Contractor’s waste characterization sampling.

Conventional demolition techniques shall be employed for all painted surfaces with the Contractor complying with applicable OSHA and Cal/OSHA statutes regarding:

- Worker awareness training;
- Exposure monitoring, as needed;
- Medical examinations, which may include blood lead level testing; and
- Establishing a written respiratory protection program.

Mitigation Measure 3.7-6 PCB-Containing Materials. One material is assumed to be PCB-containing (i.e., >50 ppm), pending destructive testing or visual examination prior to demolition: PCB hydraulic fluids associated with the elevator equipment.

This material will require sampling and waste profiling or visual examination during demolition of the building or removal of the material. Until sampling can be performed to determine PCB content, this material shall be assumed to contain > 50 ppm PCBs. The contractor shall examine

the lighting ballasts during the demolition process. If a "No PCBs" stamp is absent, the ballast should be assumed to contain PCBs.

All PCB hazardous wastes (if identified) shall be disposed of in accordance with Federal (Toxic Substances Control Act), State, and local regulations.

Mitigation Measure 3.7-7. Mercury-Containing Materials and Other Hazardous Materials. Fluorescent light tubes were observed throughout the space. Fluorescent light tubes shall be either disposed of as hazardous waste, or recycled for mercury content in accordance with applicable law and regulation.

All Freon shall be evacuated from AC units by trained professionals prior to demolition or replacement. The Freon shall be properly reclaimed for reuse.

Impact 3.7.6: The project would be subject to, or create additional wildfire risks. (Less than Significant)

As described in the Setting section, above, no portions of the Project Site are located on lands classified as Very High Fire Hazard Severity Zones (VHFHSZ) (CalFire, 2021). The project would replace an existing school on the same overall site. Therefore it would not create or subject the students or staff to significant wildfire risks.

References

California Department of Toxic Substances Control, Letter from Pete Ruttan, Project Manager Northern California Schools Unit Site Mitigation and Restoration Program, to Julio Arroyo, Director of Maintenance, Operations and Safety Mill Valley School District, July 3, 2025.

Cal Fire. *Fire Hazard Severity Zone Viewer.* https://egis.fire.ca.gov/FHSZ/. Accessed April 9, 2025.

Ninyo and Moore, *Preliminary Endangerment Assessment (PEA) Report, Mill Valley Middle School, 425 Sycamore Avenue, Mill Valley, California, October 16, 2025*.

Ninyo and Moore, *Draft Preliminary Endangerment Assessment Report, Mill Valley Middle School, 425 Sycamore Avenue, Mill Valley, California*. Prepared for the Mill Valley School District, April 8, 2025.

Ninyo & Moore, *Human Health Risk Assessment, Mill Valley Middle School, 425 Sycamore Avenue, Mill Valley, California*, August 20, 2025.

Ninyo & Moore, Memo from Ryan Bast, Ninyo and Moore, to Christian Cebrian, Cox, Castle & Nicholson LLP, August 20, 2025.

SCA Environmental, Inc. *Summary Report: Limited Destructive Pre-Demolition Hazardous Materials Survey, Mill Valley Middle School 425 Sycamore Avenue, Buildings 1-5 Mill Valley, Ca 94941*. July 2024.

SCA Environmental, Inc. *Summary Report: Pre-Demolition Hazardous Building Materials Survey MVSD, Mill Valley Middle School Building M and Portables 425 Sycamore Avenue Mill Valley, Ca 94941*. January 2025.

D. MINOR TEXT CHANGES

In response to comments received and additional information that has become available after publication of the Draft EIR, the District makes the following text changes to the Draft EIR:

- For clarity, in the first sentence of the last paragraph on Chapter 5, "Rehabilitation" is revised to read "Modernization".

- The DEIR Table of Contents, Appendices section, is revised as follows to correct inconsistencies with the text headings:

  APPENDICES

  A. Notice of Preparation (NOP)
  B. Comments on NOP
  C. Air Quality and GHG Supporting Information
  D. Biological Resources Supporting Information
  E. ~~Preliminary Endangerment Assessment and Post-Closure Land Use Plan Outlin~~e Human Health Risk Assessment (HHRA)
  F. Noise Technical Study
  G. Transportation Study
  H. Alternatives Evaluation Materials

- The Cumulative Impacts discussion on pp. 4-3 and 4-4 of the DEIR has been revised as follows:

  A review of cumulative projects proposed in the City identified the following ~~one nearby~~ project<u>s</u>:

- ~~Wastewater Treatment Plant Rehabilitation Project, Phase 2 (Sewage Agency of Southern Marin) – This project phase has been completed, so no overlapping impacts with the proposed project are anticipated.~~

- ~~According the City, additional cumulative projects in the vicinity of the proposed Project include~~ An approved 45-unit multi-family housing project at 1 Hamilton Drive, adjacent to the City's Public Safety Building,

- A 25-unit multi-family residential project with 2240 sq. ft. of commercial space at 575 E. Blithedale and Camino Alto,

- A planned 4000 sq. ft. Department of Public Works administration Building at the City's Corporation Yard, and,

- Two under-construction condominium projects at 500 and 575 Miller Avenue, with a total of 25 condominium units and 5,000 sq. ft. of commercial space.

The proposed project is a school replacement in kind or the existing school at the site and therefore its operations would not contribute in a cumulatively considerable way to any potentially significant cumulative impacts associated with other development in the area.

~~Because there are no cumulative projects in the project area, there would be no potential for the project to contribute to any local cumulatively considerable impacts.~~ Project contributions to regional cumulative impacts, such as air quality and greenhouse gas emissions, are addressed in those respective sections. No further analysis is required.

- Mitigation Measure 3.3.1C on p. 3.3-18 of the DEIR is replaced with the following measure.

Mitigation Measure 3.3.1c (California Ridgeway's Rail and California Black Rail Surveys and Avoidance):

A qualified biologist shall survey for, and map, potential California Ridgeway's Rail (CRR) and California Black Rail (CBR) habitat within 700 feet of any proposed construction at the Sycamore Avenue site. If no such habitat is encountered, no additional mitigation is required.

If potential nesting habitat is identified within 700 feet of proposed construction areas, protocol-level surveys using the 2017 USFWS Site-Specific Survey

Protocol shall be conducted, and survey results shall be submitted to CDFW. If no nesting CRR or CBR are encountered, no additional measures are required.

If breeding CRR or CBR are identified in the annual breeding season surveys, work done during the breeding season within 700 feet of CBR and CRR occupied nesting habitat shall not cause noise levels exceeding 10 decibels (dBA) over existing ambient noise levels. If noise levels are determined to exceed 10 dBA, the applicant shall prepare a noise and visual avoidance plan (including barriers) and obtain CDFW's written approval of the plan and implement the CDFW-approved plan, prior to conducting noise-generating Project activities.

- In order to more clearly describe the potential Tribal Cultural Resources impacts of the Alternatives, the Tribal Cultural Resources have been separated from the Cultural Resources discussions and placed into separate subsections in Chapter 5, Alternatives, as provided below. Tribal consultation also has been updated to include the current status of consultations with the Federated tribe of Graton Rancheria (FIGR) No new potentially significant impacts are identified and no are new mitigation measures are required.

5.5.1. No Project Alternative

Tribal Cultural Resources

Under the No Project Alternative, no construction or ground-disturbing activities would occur. Therefore, no tribal cultural resources would be affected.

5.5.2. Alternative 2: Interim Housing at Edna Maguire Elementary School (Terra Marin Site)

Tribal Cultural Resources

Tribal cultural resources for the permanent campus would be the same as described in Chapter 3.11. No impacts to resources at that site are expected.

With respect to the Interim campus at the Edna Maguire/Terra Marin site, Solano Archaeological Services (SAS) emailed a letter and a map depicting the alternative site area and surrounding vicinity to the NAHC requesting a Sacred Lands File (SLF) search with the proposed Project to determine if any sites or properties possessing cultural significance for the Native American community were present within or adjacent to the alternative site area. According to Mr. Mathew Lin, Cultural Resources Analyst with the NAHC, no documented sacred sites are listed in or near the alternative site area. As stated in Chapter 3.3, the NAHC also provided contact information for the following tribal representatives:

- Mr. Greg Sarris, Chair – Federated Indians of Graton Rancheria
- Ms. Bunny Tarin, Tribal Administrator – Guidiville Rancheria of California
- Mr. Michael Derry, Historian – Guidiville Rancheria of California
- Mr. Kenneth Woodrow, Chair – Wuksachi Indian Tribe / Eshom Valley Band

After initially contacting the tribes listed above on August regarding the Project, the Mill Valley School District re-contacted these tribal representatives on August 12, 2025, via email and certified mail to make the tribes aware that this consultation not only included the proposed Project, but also alternatives, and provide additional information on the off-site alternatives. On August 18, 2025, the Federated Tribes of Graton Rancheria (FIGR or Graton), requested consultation with the District regarding the Project, alternatives, mitigation measures. None of the other tribal contacts have responded as of November 21, 2025.

The FIGR recommended:

- 1. Tribal cultural resources be preserved through avoidance;
- 2. Tribal cultural resources be treated with culturally appropriate dignity;
- 3. Permanent conservation easements be established; and
- 4. Tribal cultural resources be protected.

Also requested were archaeological maps of the known cultural resources within the proposed Project and alternatives areas, the results of any record searches, the results of any archaeological inventory surveys, the results of any Sacred Lands File searches, any ethnographic studies conducted in the proposed Project area, and any geotechnical reports.

The requested documents were provided to Graton on September 8, 2025. A Consultation telecom call was subsequently scheduled and occurred on October 1, 2025. On this call the District described the current status of the Project and alternatives. Graton expressed concerns that they were not consulted with earlier and had questions regarding which of the alternatives were currently under serious consideration for possible approval. Graton also requested that Tribal

Cultural Resources be addressed in a chapter separate from Cultural Resources. This section addresses that request for the alternatives; the new Chapter 3.11 provides additional information.

The District also agreed to provide Graton with any available additional studies regarding the Project site. The site geotechnical report was provided to FIGR on October 4, 2025. FIGR representatives subsequently conducted site visits at both the Project site and Edna Maguire/Terra Marin Alternatives sites on October 9, 2025, with District representatives. The District subsequently emailed the Tribe on November 6 and 13 2025 to solicit any comments and concerns. No response has been received from the Tribe as of the date of this Final EIR, and consultation is considered complete.

As described in the Cultural Resources subsection for this alternative, the overall Edna Maguire/Terra Marin site includes Native American burials. A portion of the interim housing site overlaps the mapped burial site. Mitigation Measure 5.5-1, as revised, would reduce impacts to any to this resource to less than significant.

Alternative 3: Permanent Middle School AT Edna Maguire School with Relocation of Primary School Students

Tribal Cultural Resources

Although this alternative would primarily house the middle school students in existing Edna Maguire facilities, construction of a new 20,000 sq. ft. classroom building would be required. Impacts of construction of this building on tribal cultural resources would be similar to those described for Alternative 2, above. Mitigation Measure 5.5-1, as revised, would reduce impacts to any to this resource to less than significant.

Alternative 4: Permanent Dual Campuses at Edna Maguire/Terra Marin School Site

Tribal Cultural Resources

Impacts to tribal cultural resources under this alternative would be similar to, but somewhat greater than, those described under Alternative 2, above, because the earthwork required to install the new permanent buildings at that site may result in significantly greater impacts on cultural resources and tribal cultural resources than would the proposed Project, with greater potential for impacts to burials. Mitigation Measure 5.5-1, as revised, would reduce impacts to any to this resource to less than significant.

Alternative 5: Renovation of the Existing MVMS Main Building and Gym

Tribal Cultural Resources

As described in Chapter 3.3, this site is underlain by remnants of a burn dump which, in turn, is underlain by Bay Muds. In addition, the amount of grading and ground disturbance would be reduced by about 65% compared with the Project. Therefore, the likelihood of any tribal cultural resources being affected by the renovation alternative is minimal, as with the Project.

APPENDICES

APPENDIX A. TRANSCRIPT OF DEIR COMMENT PERIOD PUBLIC MEETING COMMENTS

REGAL
COURT REPORTING

In the Matter Of:

MILL VALLEY SCHOOL BOARD DRAFT PUBLIC HEARING

PUBLIC COMMENTS

September 10, 2025

Case No:

CERTIFIED COPY

MILL VALLEY MIDDLE SCHOOL RECONSTRUCTION PROJECT

DRAFT ENVIRONMENTAL IMPACT REPORT

PUBLIC COMMENT

IN RE MILL VALLEY SCHOOL BOARD)
DRAFT EIR PUBLIC HEARING)

CERTIFIED COPY

TRANSCRIPT OF PUBLIC COMMENTS

WEDNESDAY, SEPTEMBER 10, 2025

5:32 P.M.

LOCATION:

Mill Valley Middle School Library

425 Sycamore Avenue

Mill Valley, California 94941

REPORTED BY:

Mona M. Russo, CSR No. 8771, RDR, CRR

WEDNESDAY, SEPTEMBER 10, 2025 5:32 P.M.

PROCEEDINGS

MR. GRASSETTI: Good evening. I'm going to just briefly run through the process and focus of the meeting tonight. The process, this is a multistage process, the CEQA review process. It started a year, year and a half ago back in June and July. We had a public hearing for people to comment on the scope of the EIR, or the draft EIR. The draft EIR has now been prepared and is out for public and agency review.

And the purpose of tonight's meeting is to get comments on the content, the adequacy of the EIR and its analyses. I know that there's a lot of passion out there about different alternatives and different sites and all of that, and those are addressed in -- the environmental effects of those are addressed in the EIR, but the EIR is essentially an informational document for the board to consider when they take a final action on the project.

So tonight what we're looking for is comments on the adequacy of the draft EIR, focusing on the environmental review, focusing on impacts, analyses, technical analyses, mitigation measures,

analyses of alternatives, things like that.

And what we'll do is, we'll take all those comments, and we will prepare written responses to any of the comments that are on environmental issues. If there's a comment on the -- which alternatives you prefer, which ones you don't prefer, those are fine, but those comments we don't have to respond to. What we'll do is, we'll just include them in the document for the board's consideration.

The comment period started on the 2nd and goes through October 17th. I think it's 5:00 p.m. on October 17th. Any comments that come in by that date, we'll start working on the responses to those. And after we complete those responses, we'll have a comments and response document, which will -- in which we will have some revisions to the draft EIR, and those will be the provided to the board.

The board is required then, in accord with approving a project or alternative, to certify the document as adequate, as complete and adequate. It doesn't have to be perfect, but it's got to be adequate. And then I think right now, that's scheduled or anticipated to happen in a board meeting in December. There will be two hearings

then at that meeting. One is on the adequacy of the EIR and certification of the EIR, and the second would be on approval of a project alternative should the board wish to do that at that point. It can also do that at a later date. They just have to certify the EIR before approving something.

With that, I'll turn it over to you.

MS. KAUFMAN: Okay. Switching to going over our norms for engagement, we do have a court reporter here this evening. We've already collected our speaker cards.

The speaking order will be in-person speakers first and then online participants. When you're called, we ask you to come to the podium, or if you're online, we ask you to unmute. We ask you to introduce yourselves, state your name and spell your name, your city and neighborhood, and your affiliation with the district or community.

The allotted time is two minutes per participant, one opportunity per person, please, and if another speaker has already made your point, simply state agreement with that person rather than restating the same information, if you will.

Comments are -- may also be submitted in writing. We like to have those in writing because

it helps us really assimilate in real-time on a daily basis the information we're getting, and it's provided quickly to all five trustees, myself, and then Julio, who would then send it to our environmental impact review team. So that is the best way for us during the period from September 2nd to October 17th to get your comments.

And then, of course, as Richard said, this is the time to talk about the environmental impact report and not necessarily your preferences or where you would like us to place the school based on what your own personal feelings are, so the technical adequacy and content are the focus here.

And, again, we welcome any comments. I do ask that when you submit comments in writing, that you do send them to Julio Arroyo because whether they're related to your preference for where to locate the project or the EIR, it's just great for us to have them all filtered through the EIR process, and then we can decide what we can respond to or not in the EIR. So with that --

MR. GRASSETTI: And one more -- just one quick addendum, which is tonight we won't be responding to public comments or questions tonight. We're just taking them.

MS. KAUFMAN: Right. And I think that's another piece of information. The board will not be opining. I have done some presentations that have shared what my perspectives on pros and cons are and consideration, but the board is unable to opine on a project or a preferred project prior to the certification of the EIR, which we anticipate in December based on the time length for public comment and response. So please know that a lack of response is not a lack of listening or attention. And with that, I will hand it over to Sharon.

MS. NAKATANI: Thank you. So we have 32, 33 speakers. I'm going to call three names. The clock timer will be set for two minutes. You can see the clock from the podium, so please be mindful of your time. Again, I'm going to reiterate please state your name, spell it if necessary, and also your affiliation, if you're a community member, if you're a parent, if you're a teacher.

So first we have Ralf Modrich and then Kaiya Forzley and Michael Goodwin. So please come on up, Ralf. Thank you.

RALF MODRICH: I'm familiar with the EIR reporting in general. I'm working with construction this week, but in this specific case, I would

incorporate the social aspects of the environment on this case. I'm a participant in the Tae Kwon Do dojo at the middle school there, and this club or this dojo has a significant impact on the community here, and that's why I say the social aspect of the environment.

And I want to extend on this a little bit. I'm from Germany, and I started practicing Tae Kwon Do 35 years ago in Germany, and I wanted to learn the senior sensei of the club, knowing -- at the worldwide display in Munich. And you have to bear with me, but I came here to the U.S. and couldn't find a place where I could practice Tae Kwon Do, and I found this place in -- here at the middle school. And I just want to point out the excellence of the place. If there's one thing, it's a worldwide known place to have here in the community.

And then to basically extend on that social aspects, if you --

(Timer beeps.)

MS. KAUFMAN: We do have a time limit. You're welcome to email, too. You can email it to Julio Arroyo at mvschools.org. Thank you.

RALF MODRICH: To finish the sentence, there's -- there are, like, several generations,

from little kids to old persons like me practicing there, and if you know that, like, if you are happy, that has like a third-level impact on the community.

So if you -- it's like a thousand-people impact on the community, so it's like a place where it can have a big impact on the community.

MS. KAUFMAN: Thank you.

(Applause.)

MS. KAUFMAN: I'm sorry. We're just going to hold applause because it could be a boo, too, and we don't want to hear that all night. So please hold your applause, so any comments, we just want to hear your comments. Thank you very much.

MICHAEL GOODWIN: Good evening. My name is Michael Goodwin, and I'm a resident of Homestead Valley and a parent of two students in the district.

I'm here tonight because I believe in the importance of renovating the Mill Valley Middle School, the Sycamore campus, and I fully support the on-site temporary housing during construction.

It's disheartening to see this crucial project held up repeatedly by the threats of lawsuits and other methods from what I believe is a small group. Every delay not only costs us Measure G taxpayers valuable funds, but it also is giving

our children the safe, modern, and inspiring school environment that they deserve.

The new draft EIR confirms that renovating the current campus is safe, practical, and responsible going forward. It allows us to keep the students together, fostering that strong sense of community, and helps us avoid the significant traffic headaches and disruption that building at the Lomita campus site would unfortunately create.

We chose you to make thoughtful decisions for schools, and I kindly urge you to stand firm decisively and help us start building the right future for our students right now.

Thank you so much for your consideration.

MS. NAKATANI: Thank you. Kaiya, Kaiya?

KAIYA FORZLEY: Hi. My name is Kaiya. I just have a few things to share. I'm 16 years old, and I've been doing Tae Kwon Do for over 10 years, and dojo has been the longest and most meaningful commitment of my life. It's more than a place to train. It's a family and community that has shaped who I am. The dojo was founded by Roger Carlon, who raised and mentored so many of us. For 42 years, this place has taught discipline and respect.

Taking away the dojo is not just taking

away a building but a legacy and community. Please protect the dojo.

MS. NAKATANI: Thank you. Next we have Chantal Carlon, Lara Zegart, and Roger Carlon.

CHANTAL CARLON: Hi. Good evening. My name is Chantal Carlon, C-h-a-n-t-a-l, C-a-r-l-o-n, Mill Valley. We are the tenants of West America Tae Kwon Do for the past 42 years.

Good evening, members of the board and community. My name is Chantal Carlon. I am the daughter of Roger Carlon, who everyone affectionately in this community knew and adored as sensei. I am the co-owner of both West America Tae Kwon Do and West America After Care, as well as the lead coach at the dojo.

First, we want to express our heartfelt gratitude for this community. Over the past four decades, you have all shown up for us in times of hardship, such as the unexpected passing of our father three years ago, and in times of celebration. Your support has meant everything to us and is why we continue our passion each day.

We also want to extend a thank-you to the Mill Valley School District for hosting this meeting today and for including us in this discussion. We

appreciate the opportunity to be tenants of the school district. For 42 years, our family business has been part of the fabric of Mill Valley.

What began as my father's dream in 1983, built quite literally with his own hand, has grown into a place where generations of family come together to learn, grow, and thrive.

We are a proud family-owned and operated educational and fitness institution in this community, and we are proud to represent the American dream of perseverance, community, and family. Our dojo has not only taught just martial arts but life lessons, respect, humility, integrity, perseverance. These values have shaped the lives of countless students, many of whom now bring their own children back through the doors.

The proposed construction project at Lomita would displace not only our dojo but also our After Care program. Together these programs serve as a vital role for families. The dojo and After Care programs provide a safe, trusted place for children immediately after school, and because of its location, many of those students who are part of the After Care are then able to train for dojo as well. The two programs are intertwined, supporting

one another and supporting working families in this community. To take them away from this location would be to break apart something that is essential, not just convenient. Thank you.

MS. NAKATANI: Thank you. Lara?

LARA ZEGART: Hello, everyone. My name is Lara Zegart, and I am the co-owner and director of West America After Care, one of the businesses at the Lomita location at risk of being displaced. I have been part of the Tae Kwon Do community for over 25 years. It's family.

Ten years ago, Sensei Master Roger Carlon answered the need in the community for an after-school option for local students where they could have homework help and supervision while parents worked. We teach respect and manners, perseverance, patience, kindness, and communication. Having the ability to pick up students from their classrooms, walk them across to a safe nurturing after-school environment, not only gives working parents peace of mind but is an indispensable and essential service to our community and as a whole where limited options exist for close families.

We do not just serve the Edna school community at that location, but we have accommodated

students from every Mill Valley school, elementary school, within the last decade of our operations.

As a local business, committee member, and kido sponsor, I want to express our opposition to the option of having middle school students at the Edna Lomita campus.

In addition to the cons list provided by the school district and in the EIR, I would like to highlight some social impacts: The archaeologically sensitive Native American site at the Lomita location; the loss of the Lomita soccer fields, which is greatly used by residents and the Mill Valley Soccer Club. This location is also inadequate to accommodate exit in case of emergency or disaster for an increased student body and the surrounding community.

Another point to consider is, there's a reasons school separate elementary and middle school kids. The social impact with that many in a small space would be impossible to adequately monitor, and they are not developmentally compatible. According to the 2024 numbers, there are 757 students at MVMS and 428 at Edna. The new total would be 1,185. That is almost a 177 percent increase.

(Timer beeps.)

MS. NAKATANI: Please just finish your sentence. Thank you.

LARA ZEGART: These numbers not only include the student body. Teachers, admin, and the district office would also be in need of relocation.

Thank you so much for your time.

ROGER CARLON: Hello. My name is Roger Carlon. I'm a teacher and co-owner of both West America Tae Kwon Do and West America After Care on the Lomita campus. I have a few issues to bring up in regard to the opposition of modernizing the campus at the Lomita campus.

One of those such concerns is the severe traffic congestion that would be in this area. Anybody who's been down Lomita itself knows how scarce and narrow the roadway is, even not at peak traffic congestion hours. It's already busy enough with the children and animals and everything else, but with the entry and exit routes at the site being as limited as they already are, adding any further congestion would delay quicker response times in the event of medical emergencies, natural fires, disasters, emergency medical personnel, first responders coming into the area. Adding a middle school, with the increase in student population,

would intensify an already problematic situation.

Equally concerning is the geographical bounds that this would create. Locating the middle school at the Edna Lomita campus, which sits at the far edge of Mill Valley, rather than a centralized location, would make access significantly more difficult for families, and burdening families with additional challenges for both education and extracurricular activities isn't very favorable.

Lastly, as far as construction concerns go, we've been open and running during the reconstruction of the Edna Maguire campus that's going on less than 10 feet from our very doorstep. In my email comment, I will attach a photo for proof of all this stuff.

But Edna was open. Redwood has been open during reconstruction. And San Rafael High School, which just had the biggest reconstruction project in the area, had a giant gym complex and a pool and these other things. And they've all been open, and none have ever had to relocate as a result of reconstruction. Moving students and going under construction are both disruptive, and having to compound these issues would be doubly so.

So, just, thank you.

MS. NAKATANI: Thank you. Next we have Robyn Adcock, Dusty Kenney, and Cortney Oldt.

ROBYN ADCOCK: Good evening. My name is Dr. Robyn Adcock, A-d-, like dog, c-o-c-k. I am a Mill Valley mom for the last eight years and a proud member of the West America Tae Kwon Do community for the past six.

As a single mom in Mill Valley, this business has been the single most important factor that has led to my ability to parent in this town and maintain my job as the director of integrative medicine at UCSF for pediatrics. I would not have been able to work the hours that I work without an affordable and safe After Care program that West America Tae Kwon Do has offered to my family. This small business, here for 42 hours, is an incredible thing to imagine with thousands upon thousands of families that have been impacted positively by this.

This business employs community members, including high school kids, giving them the chance to learn child development skills through the After Care program and summer camps and holiday camps.

The services are affordable. The martial arts program, of course, After Care, Summer Care, and the impact that this business has on the

community is something that you can't quite measure but you can feel. For anyone that knows students that have come out of this program, they know they uplift the community with the youngest children all the way up in learning self-respect, respect for school, self-esteem, and dedication and hard work.

So the thought, I guess, in a world where nothing feels stable and we know nothing is permanent, to imagine a business of 42 years possibly being displaced for what's otherwise a temporary solution for the middle school would be a waste, and I really encourage a more creative decision if possible. And I thank you as a proud parent who has raised two kids in Mill Valley. Thank you for all your work.

DUSTY KENNEY: I'm Dusty Kenney, D-u-s-t-y, K-e-n-n-e-y, and I live on Lomita, next to Edna Maguire, and I have a second-grader there.

If you'll just imagine with me for a minute that you live next door to Edna Maguire, like I do. It's around 10:00 o'clock on a Tuesday morning and you're working in your home office when you notice smoke out your window. You go outside and think, wow, that seems close, so you call your husband at work, and you can just go grab your

second-grader from the school, you know, just in case. You throw on some shoes and get over to the office and wait for them to call her from class.

You head outside and see a fire sneaking over the ridge and jumping from tree to tree, and the tall redwood in your neighbor's backyard has just caught fire. So you grab your keys and jump in the car, deciding it's too late to save anything from your house, but as you go to back out of your driveway, you are blocked because a flood of 1,400 panicked parents are in their cars, flooding your small residential street, multiple cars wide, and there's nowhere for you to go. You can't even get out of your own driveway.

This may sound sensational, but it happened to my best friend just this year, but at least when she had to drive down a sidewalk and over the median to get around the traffic blocking her way to her 12-year-old son that was evacuating the school on foot, she had the benefit of doing so on a wide major roadway at Sunset Boulevard.

Now imagine you just approved the plan to build a middle school on a larger plot of land in the center of town accessed by several major roads and surrounded by open space. Thank you.

CORTNEY OLDT: Hi. I'm Cortney Oldt, C-o-r-t-n-e-y, O-l-d-t. I'm a parent who has a ninth-grader and a fourth-grader at Edna. My ninth-grader started at Edna in TK, so we've been at Edna for a very long time, and everybody is great there.

Okay. I would like to comment on the middle school location being on Lomita Avenue. The first thing that comes to my mind is the traffic. The roads coming into Edna cannot handle Edna traffic and middle school traffic. That location can't handle the traffic for a school as large as the middle school and Edna traffic.

Edna Maguire is currently a nice atmosphere of grade-school kids and families that live nearby that can walk to school and then attend the program of after-school care at West America that has been part of the community for so many years. If West America had to move locations or close, it would be a big loss for the parents who depend on their kids being able to walk there from Edna and be picked up locally, and my daughter does just that sometimes.

The direct neighbors did not buy their houses with the expectation that a middle school

would be built there. The people living on Horse Hill did not sign up for cars and electric bikes cutting through their small street to get to and from school. The current middle school is in a location with many arteries and is easily accessible for kids from all parts of Mill Valley to reach.

Using Lomita Avenue's location would increase traffic all over Mill Valley because of the increase in kids being driven or bussed in if their school is no longer accessible. The middle school has been determined to be a safe site for a school, and for that reason, I believe the best decision for the community is to renovate the middle school on-site with portables on-site.

MS. NAKATANI: Thank you. Next we have Tajjah Dubin, Susan Dawson, and Michelle Passero.

TAJJAH DUBIN: Hi everyone. My name is Tajjah Dubin. I'm a student at Tam High. My name is Tajjah Dubin. I am a former Mill Valley Middle School student, current Tamalpais High School student, but most importantly, I am a student of six years and a black belt at West America Tae Kwon Do.

As a current sophomore at Tam, I'm watching the school go through construction, a remodel my peers and I are beyond grateful for and

all agree is much needed. I don't understand why Mill Valley Middle School can't do the same and take classes in portables. If the largest four grades at Tam can do it, so can the three grades at MVMS.

I understand the relocation of MVMS is a difficult decision, but don't take the easy way out of displacing West America Tae Kwon Do. The easy way out will terminate the loving and caring community that is right there. The 70 Lomita Drive campus is a facility from the outside, yet on the inside it is a home.

To those who have the authority of this decision, please use your power for good. Before you evict the Carlon family, please stop by, take a look at all the lives you're affecting and negatively impacting. In the two small rooms and the hallway at the dojo lives a vast and lively circle of families.

West America Tae Kwon Do has taught me self-discipline, respect, kindness, patience, and, most importantly, perseverance. Don't conserve the dojo for me or for anyone in here. Conserve it for the future and the future generations, for the class of 2040 who need an anchoring activity in their life. Conserve it for the future adults who need a

passion to keep them in shape and mobile. Conserve it for the legacy of Master Roger Carlon. Conserve West America Tae Kwon Do for Mill Valley. Thank you very much.

SUSAN DAWSON: Good evening. Susan Dawson. I want to start by thanking you for serving in this difficult role. We all share the goal of delivering a modern middle school for our kids, but we cannot ignore the lessons of the past year. This is unfortunately not about feelings. It is about what the regulators are going to allow.

The rebuild plan collapsed after geotechnical costs exploded due to soil removal requirements. Community members repeatedly warned this could happen, yet those warnings were repeatedly dismissed. Now the district is favoring renovation, but the same threshold issues remain unresolved.

The preliminary endangerment assessment found contaminants way above the allowable levels and even one methane reading that was, quote, "in the explosive range." DTSC has not yet determined what mitigation will be required.

Meanwhile, seismically, this site sits in a liquefaction zone with lateral spread, conditions

that can cause classrooms to sink, tilt, and buckle. If the foundation must be replaced to meet modern code, the renovation options face the same cost issues that killed the rebuild.

Instead, I think the district is proposing a project that would leave the 1970s foundation as is. The superintendent said this is possible, but is it a good idea? Will the state regulators approve that? Until I see something in writing from them that they will, I don't know that we can believe that.

As for the EIR, the district is glossing over the fact that 87 percent of it is about the discard of rebuild options, which isn't really that useful. So before finalizing the EIR or again raising the collective blood pressure of our community, the district must first finish the PEA, resolve the seismic issues, and narrow the options to those that are actually feasible. Taking the time to do this is not delay. It's smart planning that protects our bond dollars and ensures a safe and modern middle school. Thank you.

MICHELLE PASSERO: Hi. Michelle Passero. I am a parent. I have a son in seventh grade here, and my daughter will be here next year. I really

appreciate the opportunity to speak, and I do want to associate myself also with the comments of Susan Dawson. I certainly appreciate the hard work that you've been investing in this. I know it's not easy.

I do want to just make some comments that are related to the letter from the Department of Toxic Substances Control that's dated July 3rd, in documents relating to the draft environmental impact report that was provided in the context of the MVMS future rebuild. I do think it raises some questions at least for me about the current conditions.

Page 3 of that letter talked about soil vapor testing and contaminants of concern, like heavy metals and dioxins exceeding regulatory standards near school buildings.

Page 7, which was already mentioned, refers to another soil sample registering the same emissions. That was in the 5 percent, which is at the lower threshold of being explosive.

It would be great to better understand how these findings will be addressed for the safety of our children. DTSC has recommended a comprehensive indoor air sampling plan, which should be done irrespective of where this project goes. Thank you

very much.

MS. NAKATANI: Thank you. Next we have Christy Atkisson, Maggie Spillane, and Alex Duvall.

CHRISTY ATKISSON: Hi there. My name is Christy Atkisson. I have a third-grader and a first-grader at Edna Maguire. I am a naturopathic doctor, and while I am not currently practicing, I have experience in environmental medicine.

I found the EIR to be clear in demonstrating that the interim housing on the middle school campus is safe and meets all safety guidelines and outlines all the environmental and safety mitigation that remodeling the middle school will require.

The bottom line is that the testing reveals this project can be done within the standards of governmental -- government-required -- the government-required environmental and health agencies. So why are we still talking about it? Let's instead talk about the safety of building an interim and, heaven forbid, permanent middle school on the Edna/Terra Marin campus.

Let's say for a minute the acreage at Edna did meet the California Department of Education's guidelines for a TK through eight campus, which it

does not. I would like you to imagine, which a lot of people have alluded to, the one-lane road in and out of campus. Now imagine adding almost a thousand more students and staff to that campus. Now imagine an emergency, a fire, a tsunami, a school shooting.

It's known that there has been no ingress/egress study on this neighborhood and the impact that this kind of additional congestion would cause during an emergency. Add to that there's virtually no cell phone reception and no plan to improve this.

And maybe my biggest fear is one that no one wants to think about, that both MVMS and Edna are open campuses. It's hard enough now to identify which kids and adults belong there on a daily basis. Upwards of 1,000 people from a 14-acre campus added to a 9-acre -- moved to a 9-acre campus where there will be close to 1,200 kids, and where elementary and middle schools will share buildings and fields, opens up the potential for risk.

Just two years ago, there was an instance of a man exposing himself in the girl's bathroom at MVMS, and while I know that this could happen anywhere, keeping our campuses small, make them manageable, make them more manageable to mitigate

these types of risks. Thank you.

MAGGIE SPILLANE: Hi. My name is Maggie Spillane. I live in the Horse Hill neighborhood, and I have two children that attend Edna Maguire.

I wanted to just piggyback on what other people are saying that the environmental impact report clearly states the site of the current middle is safe to build at. This is the least disruptive and most effective use of resources and money, and I trust the board will move forward with this as it is the best option for our children and our community.

I wanted to also talk about the concerns of traffic and congestion and speeding, especially with e-bikes. We have already met with the police department in our neighborhood about concerns of people speeding down our streets, trying to get out of the East Blithedale traffic, and we feel like it's only a matter of time before something bad happens to one of our kids. Adding another thousand people to that community, we're convinced something bad will happen to a kid, as many of our kids play outside in that neighborhood.

There is also a large, very active religious center on Shell Road that has multiple large events throughout the week. It has a lot of

traffic coming in and out of it on those days, which congests the entire community already, and adding another thousand people to that community will bring that traffic to a standstill. I was at a park during the tsunami warning, and I was told it would be faster to walk home.

Also, we have a parcel tax increase vote coming up, and the last one barely passed. If we don't pass it, it's going to be catastrophic to our school community and the school district. A strong well-funded public school system is the cornerstone of communities. Property values, businesses, and children will all be negatively affected if we can't pass this parcel tax and if people see what is happening with this bond that passed years ago that barely passed.

So, please, I really beg for you guys to move forward with the current plan at the stage that it's in. Thank you.

ALEX DUVALL: Hi. My name is Alex Duvall. I am a parent in the community and a former teacher in the district.

I usually write something, but I -- well, first of all, I've been lucky enough to spend, every day, a little bit of time with Dr. Costa this week

because I've attended a lot of meetings, and I want to thank all of you for hosting these meetings on school sites to help people understand what's going on. And I want to thank Tracy Craig, who joined us for some of these meetings and was really helpful in illuminating some of the things that are going on.

Instead of writing something, I just -- I was looking at your team norms when I was sitting there, and I know you guys abide by them, but some of them that really stand out to me right now are valuing and considering a diversity of ideas, which you are definitely doing, and I appreciate that, and I know everyone's voice should be heard; that you're holding efficient and impactful meetings. I know they don't always end up to be efficient, and apologies for all the comments that are not specific to the EIR. I think there's a little bit of confusion when you do public comment.

The ones that really stood out right now to me are we will stay focused on our goals and avoid getting sidetracked. And I know the goal is to provide a great learning space for our children and a safe place for our staff with everything that's been going on in the middle school, and I think that you have found a way to do that while

housing students on this campus.

And the last one, the most important one -- well, no. Keep our focus on the best interests for all students is most important. But when we have a difference of opinion, we will debate the facts of the situation and avoid personalities.

And what I heard in the EIR and what I have read in the EIR and what I have heard in all these meetings that I have been going to is that this is a safe place to house students. It is a safe place to renovate our middle school. Thanks.

MS. NAKATANI: Thank you. Next we have Brooke Simmons, Dorsi Bonner, and Jackson Beard.

BROOKE SIMMONS: Hi. My name is Brooke Simmons. I am a parent of a first-grader at Edna Maguire and a three-year-old who will be there in the next coming years. I am also a certified industrial hygienist and an environmental health scientist, and essentially that deals with evaluating environmental exposures, be it in the community or in the workplace.

After reviewing the EIR, I am confident that this renovation can be done safely and on-site. What I'm not competent about is the detriment to the Edna Maguire community and the surrounding homes if

it was done at that site.

I think clearly we have an issue with traffic and parking. I live in the Scott Valley neighborhood, which I may have failed to mention. The traffic already spills out into streets that you may not think would be affected with parents trying to find solutions to efficiently drop off their children. I can't imagine the impact in traffic in all of the surrounding areas if we were to more than double the size of the students coming to that area.

Not to mention, you know, as part of health and safety becomes emotional health and safety. I know that my children would be -- are already intimidated by the fifth-graders at school. To have the TK'ers and eighth-graders commingling in the same spaces just really -- it does not sit well with me, honestly.

So I am confident that we can do this safely and avoid things like taking out the after-school care, which I can attest is a very difficult thing to locate and secure.

I really appreciate you all taking these comments, and I thank you for your time.

DORSI BONNER: Hello. My name is Dorsi Bonner, D-o-r-s-i, B-o-n-n-e-r. I am a resident of

the Alto Sutton Manor neighborhood. I have been a homeowner there since 2014. Thank you so much for your attention to this matter and for your service on the board. My family has owned property in Horse Hill and Scott Valley for decades.

We have seen traffic increase in the neighborhood exponentially over the years. I am a mother of a 14-month-old and a five-year-old. I walk the neighborhood at least twice a day, every day, and sometimes I'm terrified not just of the cars but of the kids on the bikes. Increased traffic in this neighborhood would be substantial and a particular burden on the neighborhood.

As a real estate agent, we have real metrics about congestion in neighborhoods and desirability of neighborhoods. Where you put the middle school is so important to our property taxes, to the desirability of our community, and I really want to make sure that for generations we have the proper site. I have reviewed the EIR. It does seem like there are substantial reasons to keep -- environmental reasons to keep the site here, to keep the middle-schoolers here.

I echo everything that has been said by the community members who live in the Alto Sutton

Manor neighborhood and who live in the Scott Valley neighborhood. I am also part of the Tae Kwon Do community, and I stand proud of that community.

It is a very strong and important dojo to everybody who has been a part for years and years, with thousands of participants in the dojo, and to come will be a cornerstone of the community. It really would be a disservice to everybody if you displace them and if you created more burden on the Alto Sutton Manor community. Thank you so much.

MS. NAKATANI: Thank you. Jackson?

JACKSON BEARD: Hi. My name is Jackson Beard. I am in fifth grade. I am ten years old, and I would like to share a few words with you. I have a couple of things to share with you.

I do not think that you should delay this construction, for I am in fifth grade. I am okay with my fifth-grade friends and I to go through one or two years in portable domes. And if you are worried about the smell, don't be, for there will be plenty of vents and filters.

Now, I have a couple of questions for you. First off, where would we all do outside activities, like recess and PE? For two years in construction, we could go to Friends Field and play tag, dodge

ball, soccer, you name it. Now, will we have to ask them not to sue so we can at least play on it? Next, how far away are the portal classes? I think they should be not far apart because I've heard that people walk super far to get to some classes.

Lastly, can we all try to ask for enough containers for backpacks inside the classroom? Because people's backpacks get wet, sticky, stepped on, covered in ants. So don't let the bullies take my future. Please hear my voice.

MS. NAKATANI: Thank you. Next we have -- it just says Harper. If you could identify your last name for us, please. And then we have Brooklyn Beard and Sarah.

HARPER: Hi. My name is Harper, and I'm a sixth-grader, and here's what I have to say.

When I was in fourth grade, we were told that we would come to eighth grade with the school redesigned, but since the lawsuit, there is now $8,000,000 lost. Also, because of that loss, now my grade won't graduate at the redesigned school.

So you should start redesigning the school soon so the grades below me won't have to also be in portals as well. That lawsuit also doesn't make sense because the kids have to go to school five

days a week, seven and a half hours a day, so we totally deserve a school that looks nice and smells nice because it is next to a sewage treatment plant. Now, the more you put this off, the less kids will get to experience the redesigned middle school.

Also, when the school finally gets redesigned, you should build a bathroom near the field because just to go to the bathroom on the field during PE, you have to walk all the way to the PE room, get the bathroom pass, then go to the field, which is already so far away that one of my friends held it in for 40 minutes.

Don't get me wrong. There is a bathroom up there, but it's for the community center, which we aren't allowed to use that bathroom. Anyway, thank you for listening to my speech.

MS. NAKATANI: Thank you.

BROOKLYN BEARD: Hello. My name is Brooklyn Beard, and here is my speech. I have one question: When? When will the new middle school even be ready for kids to learn in? When us fifth-graders were just leaving fourth grade, we were told that we would be the first group of kids to graduate, but now because people love sports and watching their kids do sports, they're looking for

other ways. I get it. I love sports, too.

But when you think about it, does it really seem more important than our education? I don't think so. I think we deserve a track, not having to run the mile on dirt, sidewalk, gravel, and blacktop. Also, a real close bathroom in the field, we need that. We don't want the portable classrooms to smell like the sewage plant inside class anymore because they do right now.

Can you please start already? We are all waiting for a brand-new learning experience.

MS. NAKATANI: Thank you.

SARAH BEARD: Hi. My name is Sarah Beard. I am a parent of Jackson Beard, and I am a parent of Brooklyn Beard, and we brought Harper with us.

And I just wanted to say that I truly -- we genuinely respect everybody's opinions and thoughts and findings. We do, we genuinely do.

But you have to admit, our city, our children, their education, for over a year, from a small group, we are in a chokehold, and this small group, with this lawsuit and other things, has stopped everything, and it's hard to imagine, but I think perhaps that's what they want. They just want no change whatsoever. Why change anything? Let's

just continue and have a lawsuit. Let's continue to have a space where nothing gets done, and all of this that was voted for is just wasted.

You have the power. You can do something about that. You have a very limited amount of time to actually get started. Technically, we have -- we have almost no time left. If you don't make a decision that's in the best interests of the children, then who's going to do it?

I'm so proud of everybody that's come, but you guys, you've got to do something, and you're the only ones that can do it. Thank you.

MS. NAKATANI: Thank you. Next we have Rebecca Stone, Michael Cool, and Amy McCrea.

REBECCA STONE: Hi. I am Rebecca Stone. I am the parent of a seventh-grader at Mill Valley Middle and a second-grader at Edna Maguire, and I live in the Shelter Ridge neighborhood.

I am here because I want to remind the board, as well as those listening, that Mill Valley made a promise in 2022 when nearly 70 percent of voters approved Measure G, most of these without kids in our schools. Three years later, not a brick has been laid, and the middle school budget has already shrunk from $134,000,000 to $95,000,000.

Every year we stall, $8,000,000 vanishes from that budget. Like every new proposal for a project this large and vital to our community, there will always be reasonable concerns that need to be addressed. But we all have to remember we live in an overregulated state that often kills large projects like this if you let great get in the way of good. Good is achievable. It moves the ball forward, and it is less expensive than the theoretical wanderings of what could be possible.

Option one is renovating the Sycamore site. It's safe, central, and big enough for our kids now and in the future. Option two involves cramming a middle school onto the Edna and Terra Marin site, which would slash the campus site by 80 percent, overload a residential street with 177 percent more traffic, and, frankly, defies any logical form of common sense.

The voters gave us a clear mandate: Build the school at Sycamore. It's time to stop chasing excuses, stop wasting money, and build a new school. Our kids deserve that. Thank you.

MS. NAKATANI: Thank you. Michael?

MICHAEL COOL: My name is Michael Cool. I live in Novato. I am a 64-year-old student at West

America Tae Kwon Do. I'm also an ex-marine.

And I'll tell you, I have never experienced a better school in Tae Kwon Do than I have here, the most amazing, I think would be incomplete, for mental discipline. It just wouldn't -- it would be detrimental, and mainly to the kids, because what I see when these kids come in here and they start at a young age and how they change over the years, by Roger working with them and Chantal and Lara and everybody, I mean, they're, like, grown up, you know, and it's amazing.

And the other thing, by you -- by them displacing this school of 42 years, that school is nothing but love, I mean, complete love. They love each other. Those kids, they love their teachers, and their teachers love them. And when it comes to safety, what better place than to have a couple of great martial artists to protect your children, especially that school there if there's going to be problems. They're not going to have any problems if you keep them there. That's it.

AMY MCCREA: Hi everyone. My name is Amy McCrea. That is spelled M-c-C-r-e-a, surprisingly. I am a parent to a Mill Valley Middle School sixth-grader and a fourth-grader at Edna

Maguire. It is my sincere hope that all of us can come together as a community, put aside our emotions, and focus on a reasonable and logical solution for the middle school project.

I would like to state my support for the modernization of the current middle school building and for keeping the temporary classrooms at the current site for these reasons: There is simply not enough space for a middle school at the Terra Marin site and Edna parking lot. Number two, if you take away the Edna parking lot and add 700 more students and a hundred more staff to the campus, the parking and traffic burden on the neighborhood would be untenable and unsafe.

The EIR states that housing the temporary classrooms at the current site during construction will be safe for our students and staff. As a former construction professional myself, I also know that the stringent building codes under California law will control and maintain safety of this site.

I would also like to voice my support that West America Tae Kwon Do stays in its current location. Thank you.

MS. NAKATANI: Thank you. Next we have Anita Sparks, Eliza Lochner, and Leighton Lochner. And

then lastly is Brad Tewksbury after that.

ANITA SPARKS: My name is Anita Sparks, and I am here to thank the district for the extensive EIR report, and I do respect everyone's opinions, and I would like to also show my support for the West America Tae Kwon Do.

But I'm here to voice my frustration towards our community for not allowing this bond measure to take place. This bond measure passed over three years ago with resounding support from our community, and delays have caused this district well over 10 percent of its current budget, and every year that we continue this delay, it will cost us at least $7,000,000 more.

This modernization is a no-brainer to the district, and they have gone above and beyond to address our concerns. The middle school modernization and all student housing should be done at this current site. It is time for our community to rally and get this project started and completed. Let's stop kicking the can down the road, stop threats of litigation, and let's just get started.

MS. NAKATANI: Thank you. Eliza?

ELIZA LOCHNER: Hello. I'm Eliza Lochner, mother to Leighton Lochner, fifth-grader at Edna --

sorry. I'm a little out of breath -- and Lexi Lochner, sixth-grader at the middle school.

I just wanted to say I was satisfied with the report. I feel very comfortable that it's going to be safe for our children. I will have two kids on campus during the renovation, and they seem very comfortable with the idea of being in portables, not at all upset by it.

We live in Homestead Valley. This location is much better than the Edna location. They can walk to school. They can bike. I mean, they could bike to school before, but it's even closer. Lexi goes to the Teen Zone. She has more independence. So it's a better location for our family. It's going to be a safe location. And that is our desire.

MS. NAKATANI: Thank you.

LEIGHTON LOCHNER: Hi. I'm Leighton Lochner. I am a fifth-grader at Edna Maguire, and I am a blue belt at West America Tae Kwon Do. I would rather have schoolroom portables at the middle school site. The smell? Who cares? Well, let me just say this: I will do anything as long as West America, both Tae Kwon Do and After Care, stays put.

MS. NAKATANI: Thank you. Last, we have

Brad Tewksbury.

UNIDENTIFIED SPEAKER: He had to leave.

MS. NAKATANI: He had to leave. Okay. You can tell him he can email comments.

UNIDENTIFIED SPEAKER: Okay. Thank you.

MS. NAKATANI: Thank you. And now we're going to -- we're done with in-person comments, and we're going to move to online. And I don't know if all the online participants are still there, but we have Courtney Gaiman first.

Courtney, if you could -- if you are there, could you please unmute yourself? You have two minutes once the clock is set. Hold on. The volume is not turned up.

COURTNEY GAIMAN: Can you guys hear me?

MS. NAKATANI: Okay. Thank you. Let's start the clock over.

COURTNEY GAIMAN: My name is Courtney Gaiman, G-a-i-m-a-n. I have two kids in the district attending Edna Maguire.

Like many of my Edna community counterparts, I was excited to read the results of the EIR that clearly state it is safe to conduct renovations on the Sycamore site, safe to temporarily house students on-site during

renovations, and safe for students and teachers alike after project completion. I am grateful to the experts and the indisputable science behind this comprehensive report.

In addition to the disastrous parking and traffic conditions that would occur and the displacement of West America Tae Kwon Do and After Care, an irreplaceable gem in our community, I want to shine a spotlight on an incredibly important reason why the district should not pursue construction of any sort at 70 Lomita, next door to Edna.

As explained on page 5-12 of the EIR, and as a result of numerous archaeological studies, this portion of land is known to overlay a culturally significant Native American site. This includes a Native American burial site with the most recent discovery of early Native American interments or graves being recorded in 2013.

I believe it would be irresponsible to conduct construction of any kind at the Lomita property, including the required foundations of portable units at this culturally significant site. Any additional such discoveries would jeopardize the completion of the project, but, more importantly, it

would be a considerable disruption to a known sacred space.

In December, I am for the board to vote in favor of a renovation project and against any building near Edna. Let's be good stewards of the land and respectful of those who came before us. Thank you.

MS. NAKATANI: Thank you. Next we have Jeremy Revitch.

JEREMY REVITCH: Hello. My name is Jeremy Revitch. I'm a parent and a 20-year resident of the Alto Sutton neighborhood.

My resounding opinion is that the draft EIR alternative plan would be an absolute nightmare. The two roadways into the neighborhood of Edna Maguire are already incapable of supporting the current traffic, and any additional traffic would be absolutely catastrophic.

As a resident of the neighborhood, I can attest that even the addition of the much smaller amount of traffic that Terra Marin caused when they were open was unacceptable and caused disruptions in the neighborhood, which is already used as an alternative when traffic on East Blithedale is congested. Additionally, I am certain that just as

with the Edna -- or just as with the construction of Edna Maguire in 2013, no improvements will be made to adjacent roads to handle the increased traffic loads. More than 12 years after the construction was completed, lower Lomita, the primary access through the Edna Maguire site, does not have a usable sidewalk. Even worse, the roadway has been abused and in need of resurfacing for at least 20 years. Numerous council members have toured the area and promised that it would be taken care of, only to do nothing.

I believe that this option would -- either options one or options -- or, excuse me -- options two or options three would absolutely be detrimental to the neighborhood and detrimental to the construction project, not to mention the fact that my guess is that you would be mired in litigation, as happened with the Edna Maguire construction.

Thank you.

MS. NAKATANI: Thank you. Next we have Patty Robbins online. Patty, if you're there, please unmute yourself.

PATTY ROBBINS: Hi. Can you hear me?

MS. NAKATANI: Yes. Thank you.

PATTY ROBBINS: Okay. Great. My name is

Patty Robbins, and I have three kids. I have a third-grader and a kindergartener at Edna, and my youngest is at the Bright Horizons Hillside campus, which is adjacent to the Edna campus.

In my day job, I'm a lawyer at a tech company in San Francisco. I'm speaking today as a parent and a community member.

First, I would like to acknowledge that the environmental impact report and the overall record here is very clear that renovating the middle school is quite safe and that keeping students on the middle school grounds in portable units is also a safe and wise choice. These are the best options for the board.

Second, I would like to voice my sincere concern about the traffic safety issues that would arise if middle school students were temporarily housed in or adjacent to the Edna campus. The dropoff and pickup traffic there is quite hectic.

My third-grader likes to bike, and I have been excited for my third-grader to bike or walk by himself. With so many additional students arriving on campus and the inevitable increase in cars and e-bikes on the roads, I worry it will no longer be safe for the young kids to get to campus on bike or

on foot.

Lastly, I'm concerned about the impact on the Edna community, particularly in periods of declining enrollment. Potential reduction in the use of facilities and an influx of traffic and other inconveniences could unfortunately result in more families choosing private school options in lieu of the local community schools.

Thank you for considering my comments and for allowing my comments by Zoom. As you can hear, I have my kids in the background.

MS. NAKATANI: Thank you. Next we have Kelly Ellis. Hi, Kelly. Are you there?

Douglas Nelson is also next. Douglas, if you are there, we'll give Kelly a chance after you.

KELLY ELLIS: Hi. Can you hear me now?

MS. NAKATANI: Yes. Okay. Thank you. Douglas will be next. Go ahead.

KELLY ELLIS: Hi. I am Kelly Ellis, and I am a parent of two girls at Edna Maguire Elementary.

I have been following the middle school project for a couple of years now. After attending the recent meeting and reviewing the EIR, it's clear to me that the results are in, and the best option is to renovate the existing middle school and do

interim housing at that site. The data from the EIR shows that this option is completely safe and the most feasible option.

In addition, the alternative options proposed to build a school or temporary housing at 70 Lomita Avenue would cause unnecessary problems.

First, there isn't enough space. Parking is already a major issue at Edna, and adding a middle school will only make it worse.

My and many other kids already walk and bike to school in an area with poor or no sidewalks, and more traffic would make it even more dangerous. I have a kid that already fell off a bike this year or a few days ago on her first trip by herself to school, and I would be terrified, if there were more cars on the road, that something worse could have happened. I would be very worried about sending them if there were more cars on the road.

Second, the proposed site is just too small. Four acres compared to the existing 13 acres just doesn't make sense.

Finally, we would lose West America, an essential and affordable after-school program. This would leave working families with fewer options and could drive up prices at Bright Horizons, which is

already too expensive for families and at capacity.

Please, I urge you to look at the data and not just listen to the loudest voices. Let's make the choice that makes the most sense for our entire community. We need this project to move forward now, so let's get it done. Thank you.

MS. NAKATANI: Thank you. And our last online comment is Douglas Nelson. Douglas, if you are there, please --

DOUGLAS NELSON: Yes. Hello. Can you hear me?

MS. NAKATANI: Yes. We can hear you. Go ahead. Douglas, you're muted, so if you could unmute yourself.

DOUGLAS NELSON: There we go.

MS. NAKATANI: There you go. Thank you.

DOUGLAS NELSON: Should I start over?

MS. NAKATANI: Yes, please.

DOUGLAS NELSON: Okay. Douglas Nelson, community member. I live in Sycamore Park. I'm a parent of a former MVMS student.

And I just want to state a strong preference for Alternative 5, the renovation of the existing facility on Sycamore, as the most sustainable and environmentally responsible design,

also the most fiscally responsible alternative.

Regarding the adequacy of the EIR, I do have a question about deep soil mixing. It's mentioned barely once in the entire document, and I just have a fear that the deep soil mixing will devastate the existing site around the building, potentially taking out mature trees and other site features, and I would like to see some discussion of what deep soil mixing involves, how much area it would take, and what the impacts of that would be.

Also, I object to the new canopies that are shown on the renovation alternative site plan. There's two of them, one on the south entry, the main entry. This is covering over the beautiful entry garden, which, you know, is really a wonderful feature. And, also, on the north side, there's a canopy shade structure that will block the beautiful north light in the room that you're sitting in now. You know, it has beautiful light, and that canopy will make that room very dark.

So I would like to -- I know we're not really talking about design, but these are shown in the EIR, and I would like to have them both removed.

That's the end of my comments. Thank you.

MS. NAKATANI: Thank you. That concludes

public comment on our draft EIR. I want to thank everyone for coming. I want to thank all the students who came and spoke. It was really great to hear everyone. Thank you very much. And, again, you can always email comments. The comment period is open until October 17th at 5:00 p.m.

And I believe we will move on to future board items.

(Public comments adjourned at 6:38 p.m.)

REPORTER'S CERTIFICATION

I, Mona M. Russo, a Certified Shorthand Reporter in and for the State of California, do hereby certify:

That the foregoing proceedings were reported by me stenographically and later transcribed into typewriting under my direction and control; that the foregoing is a true record of the proceedings taken at that time.

IN WITNESS WHEREOF, I have subscribed my name this 12th day of September, 2025.

Mona M. Russo

MONA M. RUSSO, CSR NO. 8771

APPENDIX B. PHA TRANSPORTATION ANALYSIS RESPONSES AND CORRECTIONS

PHA Transportation Consultants
2711 Stuart Street, Berkeley, CA 94705
Phone (510) 848-9233
Web www.pangho1@yahoo.com

Response to MV City Comments

Comment 21, Camino Alto/Sycamore Avenue intersection configuration- Appendix G, Traffic Study Figure 2:

Response:
We recognize the westbound approach has a shared through and right turn lane and a left turn lane. However, the SYCHRO traffic model would not model a shared through and right-turn lane. To model that lane configuration, we have now revised the analysis to show one left-turn lane and one right-turn lane, while reassigning the through volume as part of the right-turn volume. The resulting LOS for AM would be B for the existing condition, B for the cumulative condition with 2% added traffic, and C assuming 50% driving for the built scenario; The LOS for the PM is A, A, and B for the same three conditions. The revised intersection graphic and LOS calculation sheets are in the attachment.

Comment 22, Appendix G Traffic Study Summary and Conclusions Alternative A, PG 20:

Response:
The text on page 20 showing LOS C and F was an error (misquote). The correct LOS should be LOS C and E as indicated in Table 2 (see Table 2 in the attachment)

Comment 23, Appendix G, Traffic Study Summary and Conclusions, Alternative A, page 20, lack of potential improvements:

Response:
Traffic LOS E for minor street approaches or turning movements at unsignalized intersections or intersections with no control, such as the subject intersection, would likely operate a lower service level, LOS E, as the movement does not have priority and must yield to other movements before entering the intersection. Standard traffic engineering practices consider this condition acceptable. Generally, investigation for improvements may be needed unless such movement has high traffic volumes, which is not the case with the subject location. We recommend placing a staff member at the driveway entrance to direct traffic when traffic conditions warrant. We believe stripping two inbound lanes at the entrance driveway to allow vehicles entering the driveway from both directions concurrently may be confusing to drivers and present a safety issue as vehicles turning into the

driveway simultaneously from different directions, and then need to merge to get into the parking area.

Comment 27, Global, evaluate potential modifications to Edna Maguire School Traffic Circulation and Safe Route to School Guidelines:

Response:
The traffic analysis for Alternative B assumed staggered hours for the existing Edna Maguire School and the proposed Middle School. The proposed site plans have indicated various site accesses, internal circulation, and parking options. Our field observation indicated acceptable internal circulation during drop-off time; there were, however, vehicle queues around the internal circulation lane and the drop-off lane during the pick-up hour. Vehicle queues would reach up to 15 cars at times. Parking on the site was about 85% full during the pick-up time. These conditions lasted for about 20 to 30 minutes. Traffic generally moved well at both school entrances and exits, with queues of just several vehicles most of the time in all directions. It's important to note that Alternative A was a test scenario only. We will provide an in-depth evaluation and recommended improvements, including consideration of Safe Route to School Guidelines, should this become the selected alternative.

Comment 30, Suggestion to Future Issues, and provide a list of improvements to address traffic issues:

Response: Improvements for the proposed middle school:
Assuming the proposed middle will be located at the current Edna Maguire School site:

- Place a staff member at the school entrance and exit to direct traffic.
- Place a staff member to at the current drop-off, pick up lane to assist drop-off and pick up activities.
- Designate an area near the new classrooms for the proposed middle school drop-off and pick up.
- Stagger school hours for the two schools.
- Designate an area for school buses parking should school buses are used.
- Develop a carpool program for parents
- Designate Mill Valley-Sausalito Path for student pedestrian and bike access.

Assuming the proposed middle will be located at the Terra Marin School site:

- Place a staff member at the school entrance and exit to direct traffic.
- Designate an area next to the new school building for drop-off and pick up.
- Designate the new parking lot for staff only.
- Develop a carpool program for parents and school staff.

- Designate Mill Valley-Sausalito Path for student pedestrians and bike access.
- Designate Shall Road, Meadow Drive, and Tower Drive as secondary access to the proposed middle school.

Attachments:
Figure 2 (Revised)
LOS Calculation sheet based on the revise land configuration
Table 2 MV School Study Intersection LOS at Lomita Drive

Attachment



Figure 2 Study Intersection Traffic Volumes (Revised lane configuration)
Mill Valley Middle School Traffic and Parking Study-PHA Transportation Consultants

Table 2 showing the correct LOS summary

Table 2 Study Intersection Traffic Operation (LOS) Analysis
Mill Valley Middle School Traffic and Parking Study

Study Intersections (Non-Signalized)	Existing Conditions (2024/Edna Maguire School)				Replace Edna Maguire (w/MVMS, 1,100 students)			
	A.M. Peak		P.M. Peak		A.M. Peak		P.M. Peak	
	Delay	LOS	Delay	LOS	Delay	LOS	Delay	LOS
Lomita Dr./School Exit (4-way stop)	7.9	A	7.2	A	15.6	C	15.5	C
Lomita Dr./School Entrance (no sign control)	10.8	B	9.5	A	35.7	E	35.3	E

Study intersection LOS was calculated with SYNCHRO computer software based on Highway Capacity Manual Methodology. Traffic count data were collected on May 7, 2024. LOS Calculation sheets with traffic count data are in the technical appendixes. The calculated delays and LOS for unsignalized intersections represent the traffic for the worst approach. Intersection with stop control traffic LOS is defined by delay. LOS ranking criteria are as follows:

Stop Control Intersection:

A: Delay 0.0-10.0 Seconds,
B: 10.1-15.0 Seconds,
C: 15.1-25.0 Seconds,
D: 25.1-35.0 Seconds,
E: 35.1-50.0 Seconds,
F: >50.0 Seconds.

Traffic LOS calculation sheets based on the revised lane configuration at the westbound approach of the Camino Alto-Sycamore intersection

HCM 2010 Signalized Intersection Summary
1: Camino Alto & Sycamore

AM-R
10/20/2025

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	66	36	41	129	0	141	38	560	186	119	530	17
Future Volume (veh/h)	66	36	41	129	0	141	38	560	186	119	530	17
Number	7	4	14	3	8	18	5	2	12	1	6	16
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00		1.00	1.00		1.00	1.00		1.00	1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Adj Sat Flow, veh/h/ln	1863	1863	1900	1863	0	1863	1863	1863	1900	1863	1863	1900
Adj Flow Rate, veh/h	72	39	45	140	0	153	41	609	202	129	576	18
Adj No. of Lanes	1	1	0	1	0	1	1	2	0	1	2	0
Peak Hour Factor	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92
Percent Heavy Veh, %	2	2	2	2	0	2	2	2	2	2	2	2
Cap, veh/h	177	79	91	0	0	0	80	1273	422	164	1872	58
Arrive On Green	0.10	0.10	0.10	0.00	0.00	0.00	0.05	0.49	0.49	0.09	0.53	0.53
Sat Flow, veh/h	1774	790	912		0		1774	2614	866	1774	3504	109
Grp Volume(v), veh/h	72	0	84		0.0		41	412	399	129	291	303
Grp Sat Flow(s),veh/h/ln	1774	0	1702				1774	1770	1710	1774	1770	1843
Q Serve(g_s), s	1.6	0.0	2.0				1.0	6.6	6.6	3.0	3.9	3.9
Cycle Q Clear(g_c), s	1.6	0.0	2.0				1.0	6.6	6.6	3.0	3.9	3.9
Prop In Lane	1.00		0.54				1.00		0.51	1.00		0.06
Lane Grp Cap(c), veh/h	177	0	170				80	862	833	164	946	985
V/C Ratio(X)	0.41	0.00	0.50				0.51	0.48	0.48	0.78	0.31	0.31
Avail Cap(c_a), veh/h	759	0	728				211	862	833	232	946	985
HCM Platoon Ratio	1.00	1.00	1.00				1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	0.00	1.00				1.00	1.00	1.00	1.00	1.00	1.00
Uniform Delay (d), s/veh	17.8	0.0	17.9				19.6	7.2	7.2	18.7	5.5	5.5
Incr Delay (d2), s/veh	1.5	0.0	2.2				5.0	1.9	2.0	10.9	0.8	0.8
Initial Q Delay(d3),s/veh	0.0	0.0	0.0				0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	0.9	0.0	1.0				0.6	3.5	3.4	2.0	2.1	2.2
LnGrp Delay(d),s/veh	19.3	0.0	20.2				24.6	9.1	9.2	29.6	6.3	6.3
LnGrp LOS	B		C				C	A	A	C	A	A
Approach Vol, veh/h		156						852			723	
Approach Delay, s/veh		19.8						9.9			10.4	
Approach LOS		B						A			B	

Timer	1	2	3	4	5	6	7	8
Assigned Phs	1	2		4	5	6		
Phs Duration (G+Y+Rc), s	8.4	25.0		8.7	6.4	27.0		
Change Period (Y+Rc), s	4.5	4.5		4.5	4.5	4.5		
Max Green Setting (Gmax), s	5.5	20.5		18.0	5.0	21.0		
Max Q Clear Time (g_c+I1), s	5.0	8.6		4.0	3.0	5.9		
Green Ext Time (p_c), s	0.0	4.1		0.5	0.0	3.2		

Intersection Summary	
HCM 2010 Ctrl Delay	11.0
HCM 2010 LOS	B

1=Exisitng, 2=plus 2%, 3=50% drive

HCM 2010 Signalized Intersection Summary
2: Camino Alto & Sycamore

AM-R
10/20/2025

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	67	37	42	132	0	125	39	571	190	121	541	17
Future Volume (veh/h)	67	37	42	132	0	125	39	571	190	121	541	17
Number	7	4	14	3	8	18	5	2	12	1	6	16
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00		1.00	1.00		1.00	1.00		1.00	1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Adj Sat Flow, veh/h/ln	1863	1863	1900	1863	0	1863	1863	1863	1900	1863	1863	1900
Adj Flow Rate, veh/h	73	40	46	143	0	136	42	621	207	132	588	18
Adj No. of Lanes	1	1	0	1	0	1	1	2	0	1	2	0
Peak Hour Factor	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92
Percent Heavy Veh, %	2	2	2	2	0	2	2	2	2	2	2	2
Cap, veh/h	185	83	95	0	0	0	83	1191	397	172	1776	54
Arrive On Green	0.10	0.10	0.10	0.00	0.00	0.00	0.05	0.46	0.46	0.10	0.51	0.51
Sat Flow, veh/h	1774	792	910		0		1774	2610	869	1774	3506	107
Grp Volume(v), veh/h	73	0	86		0.0		42	421	407	132	297	309
Grp Sat Flow(s),veh/h/ln	1774	0	1702				1774	1770	1709	1774	1770	1844
Q Serve(g_s), s	1.5	0.0	1.9				0.9	6.7	6.7	2.9	3.9	3.9
Cycle Q Clear(g_c), s	1.5	0.0	1.9				0.9	6.7	6.7	2.9	3.9	3.9
Prop In Lane	1.00		0.53				1.00		0.51	1.00		0.06
Lane Grp Cap(c), veh/h	185	0	178				83	807	780	172	896	934
V/C Ratio(X)	0.39	0.00	0.48				0.51	0.52	0.52	0.77	0.33	0.33
Avail Cap(c_a), veh/h	810	0	777				225	807	780	225	896	934
HCM Platoon Ratio	1.00	1.00	1.00				1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	0.00	1.00				1.00	1.00	1.00	1.00	1.00	1.00
Uniform Delay (d), s/veh	16.5	0.0	16.7				18.4	7.6	7.7	17.4	5.8	5.8
Incr Delay (d2), s/veh	1.4	0.0	2.0				4.7	2.4	2.5	11.0	1.0	1.0
Initial Q Delay(d3),s/veh	0.0	0.0	0.0				0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	0.8	0.0	1.0				0.6	3.7	3.6	1.9	2.1	2.2
LnGrp Delay(d),s/veh	17.8	0.0	18.7				23.1	10.0	10.1	28.4	6.8	6.7
LnGrp LOS	B		B				C	B	B	C	A	A
Approach Vol, veh/h		159						870			738	
Approach Delay, s/veh		18.3						10.7			10.6	
Approach LOS		B						B			B	

Timer	1	2	3	4	5	6	7	8
Assigned Phs	1	2		4	5	6		
Phs Duration (G+Y+Rc), s	8.3	22.5		8.6	6.3	24.5		
Change Period (Y+Rc), s	4.5	4.5		4.5	4.5	4.5		
Max Green Setting (Gmax), s	5.0	18.0		18.0	5.0	18.0		
Max Q Clear Time (g_c+I1), s	4.9	8.7		3.9	2.9	5.9		
Green Ext Time (p_c), s	0.0	3.6		0.5	0.0	2.9		

Intersection Summary	
HCM 2010 Ctrl Delay	11.4
HCM 2010 LOS	B

1=Exisitng, 2=plus 2%, 3=50% drive

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	67	40	42	207	0	220	39	571	266	213	541	17
Future Volume (veh/h)	67	40	42	207	0	220	39	571	266	213	541	17
Number	7	4	14	3	8	18	5	2	12	1	6	16
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00		1.00	1.00		1.00	1.00		1.00	1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Adj Sat Flow, veh/h/ln	1863	1863	1900	1863	0	1863	1863	1863	1900	1863	1863	1900
Adj Flow Rate, veh/h	73	43	46	225	0	239	42	621	289	232	588	18
Adj No. of Lanes	1	1	0	1	0	1	1	2	0	1	2	0
Peak Hour Factor	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92
Percent Heavy Veh, %	2	2	2	2	0	2	2	2	2	2	2	2
Cap, veh/h	183	85	91	0	0	0	82	1038	483	218	1819	56
Arrive On Green	0.10	0.10	0.10	0.00	0.00	0.00	0.05	0.44	0.44	0.12	0.52	0.52
Sat Flow, veh/h	1774	825	882		0		1774	2348	1092	1774	3506	107
Grp Volume(v), veh/h	73	0	89		0.0		42	468	442	232	297	309
Grp Sat Flow(s),veh/h/ln	1774	0	1707				1774	1770	1670	1774	1770	1844
Q Serve(g_s), s	1.6	0.0	2.0				0.9	8.2	8.2	5.0	3.9	4.0
Cycle Q Clear(g_c), s	1.6	0.0	2.0				0.9	8.2	8.2	5.0	3.9	4.0
Prop In Lane	1.00		0.52				1.00		0.65	1.00		0.06
Lane Grp Cap(c), veh/h	183	0	176				82	783	739	218	918	956
V/C Ratio(X)	0.40	0.00	0.51				0.51	0.60	0.60	1.06	0.32	0.32
Avail Cap(c_a), veh/h	785	0	755				218	783	739	218	918	956
HCM Platoon Ratio	1.00	1.00	1.00				1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	0.00	1.00				1.00	1.00	1.00	1.00	1.00	1.00
Uniform Delay (d), s/veh	17.1	0.0	17.3				19.0	8.6	8.6	17.8	5.7	5.7
Incr Delay (d2), s/veh	1.4	0.0	2.2				4.8	3.4	3.6	79.1	0.9	0.9
Initial Q Delay(d3),s/veh	0.0	0.0	0.0				0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	0.8	0.0	1.0				0.6	4.6	4.4	7.1	2.1	2.2
LnGrp Delay(d),s/veh	18.5	0.0	19.5				23.8	12.0	12.2	96.9	6.6	6.6
LnGrp LOS	B		B				C	B	B	F	A	A
Approach Vol, veh/h		162						952			838	
Approach Delay, s/veh		19.0						12.6			31.6	
Approach LOS		B						B			C	

Timer	1	2	3	4	5	6	7	8
Assigned Phs	1	2		4	5	6		
Phs Duration (G+Y+Rc), s	9.5	22.5		8.7	6.4	25.6		
Change Period (Y+Rc), s	4.5	4.5		4.5	4.5	4.5		
Max Green Setting (Gmax), s	5.0	18.0		18.0	5.0	18.0		
Max Q Clear Time (g_c+I1), s	7.0	10.2		4.0	2.9	6.0		
Green Ext Time (p_c), s	0.0	3.6		0.5	0.0	2.9		

Intersection Summary	
HCM 2010 Ctrl Delay	21.3
HCM 2010 LOS	C

1=Exisitng, 2=plus 2%, 3=50% drive

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	79	33	39	77	0	80	38	629	78	61	524	59
Future Volume (veh/h)	79	33	39	77	0	80	38	629	78	61	524	59
Number	7	4	14	3	8	18	5	2	12	1	6	16
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00		1.00	1.00		1.00	1.00		1.00	1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Adj Sat Flow, veh/h/ln	1863	1863	1900	1863	0	1863	1863	1863	1900	1863	1863	1900
Adj Flow Rate, veh/h	86	36	42	84	0	87	41	684	85	66	570	64
Adj No. of Lanes	1	1	0	1	0	1	1	2	0	1	2	0
Peak Hour Factor	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92
Percent Heavy Veh, %	2	2	2	2	0	2	2	2	2	2	2	2
Cap, veh/h	158	70	81	0	0	0	175	1855	230	106	1754	197
Arrive On Green	0.09	0.09	0.09	0.00	0.00	0.00	0.10	0.59	0.59	0.06	0.55	0.55
Sat Flow, veh/h	1774	785	916		0		1774	3169	393	1774	3209	360
Grp Volume(v), veh/h	86	0	78		0.0		41	382	387	66	314	320
Grp Sat Flow(s),veh/h/ln	1774	0	1701				1774	1770	1793	1774	1770	1799
Q Serve(g_s), s	2.4	0.0	2.2				1.1	5.8	5.8	1.8	5.0	5.0
Cycle Q Clear(g_c), s	2.4	0.0	2.2				1.1	5.8	5.8	1.8	5.0	5.0
Prop In Lane	1.00		0.54				1.00		0.22	1.00		0.20
Lane Grp Cap(c), veh/h	158	0	151				175	1036	1050	106	967	983
V/C Ratio(X)	0.55	0.00	0.52				0.23	0.37	0.37	0.62	0.32	0.33
Avail Cap(c_a), veh/h	629	0	604				629	1036	1050	220	967	983
HCM Platoon Ratio	1.00	1.00	1.00				1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	0.00	1.00				1.00	1.00	1.00	1.00	1.00	1.00
Uniform Delay (d), s/veh	22.1	0.0	22.1				21.1	5.6	5.6	23.3	6.3	6.3
Incr Delay (d2), s/veh	2.9	0.0	2.7				0.7	1.0	1.0	5.9	0.2	0.2
Initial Q Delay(d3),s/veh	0.0	0.0	0.0				0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	1.3	0.0	1.2				0.6	3.0	3.1	1.1	2.4	2.5
LnGrp Delay(d),s/veh	25.1	0.0	24.8				21.8	6.6	6.6	29.2	6.5	6.5
LnGrp LOS	C		C				C	A	A	C	A	A
Approach Vol, veh/h		164						810			700	
Approach Delay, s/veh		24.9						7.3			8.7	
Approach LOS		C						A			A	

Timer	1	2	3	4	5	6	7	8
Assigned Phs	1	2		4	5	6		
Phs Duration (G+Y+Rc), s	7.5	34.2		9.0	9.5	32.2		
Change Period (Y+Rc), s	4.5	4.5		4.5	4.5	4.5		
Max Green Setting (Gmax), s	6.3	29.7		18.0	18.0	18.0		
Max Q Clear Time (g_c+I1), s	3.8	7.8		4.4	3.1	7.0		
Green Ext Time (p_c), s	0.0	5.0		0.5	0.1	3.0		

Intersection Summary	
HCM 2010 Ctrl Delay	9.6
HCM 2010 LOS	A

1=Existing,,2= plus 2%, 3= 50% drive

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	81	34	40	79	0	82	39	642	80	62	535	60
Future Volume (veh/h)	81	34	40	79	0	82	39	642	80	62	535	60
Number	7	4	14	3	8	18	5	2	12	1	6	16
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00		1.00	1.00		1.00	1.00		1.00	1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Adj Sat Flow, veh/h/ln	1863	1863	1900	1863	0	1863	1863	1863	1900	1863	1863	1900
Adj Flow Rate, veh/h	88	37	43	86	0	89	42	698	87	67	582	65
Adj No. of Lanes	1	1	0	1	0	1	1	2	0	1	2	0
Peak Hour Factor	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92
Percent Heavy Veh, %	2	2	2	2	0	2	2	2	2	2	2	2
Cap, veh/h	171	76	88	0	0	0	80	1700	212	127	1807	201
Arrive On Green	0.10	0.10	0.10	0.00	0.00	0.00	0.05	0.54	0.54	0.07	0.56	0.56
Sat Flow, veh/h	1774	787	914		0		1774	3168	395	1774	3211	358
Grp Volume(v), veh/h	88	0	80		0.0		42	390	395	67	320	327
Grp Sat Flow(s),veh/h/ln	1774	0	1701				1774	1770	1793	1774	1770	1800
Q Serve(g_s), s	2.2	0.0	2.0				1.1	6.0	6.0	1.7	4.4	4.4
Cycle Q Clear(g_c), s	2.2	0.0	2.0				1.1	6.0	6.0	1.7	4.4	4.4
Prop In Lane	1.00		0.54				1.00		0.22	1.00		0.20
Lane Grp Cap(c), veh/h	171	0	164				80	949	962	127	996	1013
V/C Ratio(X)	0.51	0.00	0.49				0.52	0.41	0.41	0.53	0.32	0.32
Avail Cap(c_a), veh/h	703	0	674				198	949	962	245	996	1013
HCM Platoon Ratio	1.00	1.00	1.00				1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	0.00	1.00				1.00	1.00	1.00	1.00	1.00	1.00
Uniform Delay (d), s/veh	19.6	0.0	19.6				21.3	6.3	6.3	20.5	5.3	5.3
Incr Delay (d2), s/veh	2.4	0.0	2.2				5.2	1.3	1.3	3.4	0.9	0.8
Initial Q Delay(d3),s/veh	0.0	0.0	0.0				0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	1.2	0.0	1.1				0.6	3.2	3.2	0.9	2.4	2.4
LnGrp Delay(d),s/veh	22.0	0.0	21.8				26.5	7.6	7.6	23.8	6.2	6.2
LnGrp LOS	C		C				C	A	A	C	A	A
Approach Vol, veh/h		168						827			714	
Approach Delay, s/veh		21.9						8.6			7.8	
Approach LOS		C						A			A	

Timer	1	2	3	4	5	6	7	8
Assigned Phs	1	2		4	5	6		
Phs Duration (G+Y+Rc), s	7.8	29.0		8.9	6.6	30.2		
Change Period (Y+Rc), s	4.5	4.5		4.5	4.5	4.5		
Max Green Setting (Gmax), s	6.3	24.5		18.1	5.1	25.7		
Max Q Clear Time (g_c+I1), s	3.7	8.0		4.2	3.1	6.4		
Green Ext Time (p_c), s	0.0	4.6		0.5	0.0	3.9		

Intersection Summary	
HCM 2010 Ctrl Delay	9.6
HCM 2010 LOS	A

1=Existing,.2= plus 2%, 3= 50% drive

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	81	46	40	155	0	179	39	642	167	155	535	60
Future Volume (veh/h)	81	46	40	155	0	179	39	642	167	155	535	60
Number	7	4	14	3	8	18	5	2	12	1	6	16
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00		1.00	1.00		1.00	1.00		1.00	1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Adj Sat Flow, veh/h/ln	1863	1863	1900	1863	0	1863	1863	1863	1900	1863	1863	1900
Adj Flow Rate, veh/h	88	50	43	168	0	195	42	698	182	168	582	65
Adj No. of Lanes	1	1	0	1	0	1	1	2	0	1	2	0
Peak Hour Factor	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92
Percent Heavy Veh, %	2	2	2	2	0	2	2	2	2	2	2	2
Cap, veh/h	190	99	85	0	0	0	82	1228	320	213	1655	184
Arrive On Green	0.11	0.11	0.11	0.00	0.00	0.00	0.05	0.44	0.44	0.12	0.52	0.52
Sat Flow, veh/h	1774	926	796		0		1774	2780	725	1774	3211	358
Grp Volume(v), veh/h	88	0	93		0.0		42	444	436	168	320	327
Grp Sat Flow(s),veh/h/ln	1774	0	1722				1774	1770	1735	1774	1770	1800
Q Serve(g_s), s	1.9	0.0	2.1				0.9	7.6	7.6	3.8	4.4	4.4
Cycle Q Clear(g_c), s	1.9	0.0	2.1				0.9	7.6	7.6	3.8	4.4	4.4
Prop In Lane	1.00		0.46				1.00		0.42	1.00		0.20
Lane Grp Cap(c), veh/h	190	0	184				82	782	766	213	912	927
V/C Ratio(X)	0.46	0.00	0.51				0.51	0.57	0.57	0.79	0.35	0.35
Avail Cap(c_a), veh/h	784	0	761				218	782	766	218	912	927
HCM Platoon Ratio	1.00	1.00	1.00				1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	0.00	1.00				1.00	1.00	1.00	1.00	1.00	1.00
Uniform Delay (d), s/veh	17.1	0.0	17.2				19.0	8.5	8.5	17.4	5.8	5.8
Incr Delay (d2), s/veh	1.8	0.0	2.1				4.8	3.0	3.0	17.2	1.1	1.1
Initial Q Delay(d3),s/veh	0.0	0.0	0.0				0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	1.0	0.0	1.1				0.6	4.4	4.3	2.8	2.3	2.4
LnGrp Delay(d),s/veh	18.9	0.0	19.3				23.8	11.5	11.5	34.6	6.9	6.9
LnGrp LOS	B		B				C	B	B	C	A	A
Approach Vol, veh/h		181						922			815	
Approach Delay, s/veh		19.1						12.1			12.6	
Approach LOS		B						B			B	

Timer	1	2	3	4	5	6	7	8
Assigned Phs	1	2		4	5	6		
Phs Duration (G+Y+Rc), s	9.4	22.5		8.9	6.4	25.5		
Change Period (Y+Rc), s	4.5	4.5		4.5	4.5	4.5		
Max Green Setting (Gmax), s	5.0	18.0		18.0	5.0	18.0		
Max Q Clear Time (g_c+I1), s	5.8	9.6		4.1	2.9	6.4		
Green Ext Time (p_c), s	0.0	3.6		0.6	0.0	3.1		

Intersection Summary	
HCM 2010 Ctrl Delay	13.0
HCM 2010 LOS	B

1=Existing,,2= plus 2%, 3= 50% drive

APPENDIX C. ALTERNATIVE 5 AIR QUALITY AND NOISE TECHNICAL REPORTS

Technical Memorandum

From: Mike Ratte, Senior Air Quality Scientist, RCH Group

To: Richard Grassetti, Grassetti Environmental Consulting

Date: October 22, 2025

Subject: Mill Valley Middle School Renovation Alternative – Air Quality Impacts

This memorandum describes the air quality impacts, specifically construction-related impacts, due to the Renovation Alterative. The Renovation Alternative rehabilitates the existing Mill Valley Middle School – both the Main Building (92,000 square feet) and the Multi-Purpose/Gymnasium Building (15,200 square feet) – addressing exterior and interior finish materials as well as infrastructure improvements such as heating, ventilation and air conditioning, fire sprinklers and upgrades to electrical systems. The Renovation Alternative anticipates removal of all existing portable buildings except for the Band Room at project completion. Site improvements include solar canopies, outdoor learning spaces and improvements for safety and security (perimeter fencing). In addition, a small building for STEM education is proposed, roughly 4,000 square feet, at the north end of the existing main building. The Renovation Alternative campus would not result in an increase in enrollment.

For the Renovation Alternative, an estimated 15,000 cubic yards of spoils requiring offsite disposal would be generated during construction, and 6,000 cubic yards of fill would be imported to the site (i.e., 25 percent of the values associated with the Replacement Campus Project). For the interim campus, an estimated 14,300 cubic yards of spoils requiring offsite disposal would be generated during construction, and 3,500 cubic yards of fill would be imported to the site. Project construction would result in a total of 2.40 acres (or 25 percent of the Replacement Campus Project value) and 1.38 acres (interim campus).[1] [2] Project construction is anticipated to begin in June of 2026 and be completed by the end of October 2028. Construction activities would be conducted from 8 a.m. to 6 p.m. Monday through Friday.

The air quality analysis for the Renovation Alternative used the same methodologies employed by the Replacement Campus Project. The Renovation Alternative would employ the same mitigation measures directed for the Replacement Campus Project. Operational air quality impacts for the Renovation Alternative would be the same as for the Replacement Campus Project because the number of students enrolled and building square footage would be the same.

The supporting information, methodology, and assumptions used in the construction air emissions inventory, operational air emissions inventory, and health risk assessment are provided in:

[1] For the replacement project, the Grading Plan (dated May 23, 2025) developed an estimate of 74,270 cubic yards of spoils requiring offsite disposal would be generated during construction, and 27,487 cubic yards of fill would be imported to the site.

[2] Mill Valley Middle School Reconstruction Hazardous Soil Volumetric Analysis, dated June 6, 2025

- **Attachment A: Construction Emissions Inventory Supporting Information**
- **Attachment B: Health Risk Assessment Supporting Information**

The methodologies and models used in the Renovation Alternative are the same as used within the Replacement Campus Project.

Construction Impacts

Impact 3.2.1: Would the Project conflict with or obstruct implementation of the applicable air quality plan? (Less than Significant)

The project would not conflict with or obstruct the implementation of the applicable air quality plan because the significance levels of the Project from construction and operation activities are determined to be below the significance thresholds.

Impact 3.2-2: Would the Project construction activities result in a cumulatively considerable net increase of emissions of criteria air pollutants and precursors? (Less than Significant with Mitigation)

Construction-related fugitive dust emissions would vary from day to day, depending on the level and type of activity, silt content of the soil, and the weather. High winds (greater than ten miles per hour) occur infrequently in the area, less than two percent of the time. In the absence of mitigation, construction activities may result in significant quantities of dust, and as a result, local visibility and PM_{10} concentrations may be adversely affected on a temporary and intermittent basis during construction. In addition, the fugitive dust generated by construction would include not only PM_{10}, but also larger particles, which would fall out of the atmosphere within several hundred feet of the site and could result in nuisance-type impacts.

Per BAAQMD's *CEQA Air Quality Guidelines*, the reported PM_{10} and $PM_{2.5}$ emissions are related to combustion exhaust. **Table 1** provides the estimated short-term unmitigated construction exhaust emissions that would be associated with the project and compares those emissions to the BAAQMD's significance thresholds for those emissions. The average daily construction period emissions (i.e., total construction period emissions divided by the number of actual construction days) were compared to the BAAQMD significance thresholds. Mitigated CO emissions are greater than the unmitigated CO emissions due to control technologies that are focused on reducing ROG, NOx, PM_{10}, and $PM_{2.5}$ emissions which have a reverse effect on CO emissions. All construction-related exhaust emissions would be below the BAAQMD significance thresholds and therefore be *less than significant*.

The average daily construction emissions for the Renovation Alternative would be similar to the average daily construction emissions for the Replacement Campus Project. However, the total construction emissions for the Renovation Alternative would be approximately 50 percent of the values associated with the Replacement Campus Project due to the elimination of demolition activities, less grading activities, and less building construction.

With the implementation of **Mitigation Measure 3.2-1**, the daily construction emissions associated with the Renovation Alternative would have a less than significant impact with mitigation.

TABLE 1 AVERAGE DAILY CONSTRUCTION EXHAUST EMISSIONS

Condition	ROG lbs/day	NOx lbs/day	PM10 lbs/day	PM2.5 lbs/day	CO lbs/day
Unmitigated Construction Emissions	1.44	11.3	0.38	0.35	15.4
BAAQMD Threshold of Significance	54	54	82	54	-
Potentially Significant?	No	No	No	No	-
Mitigated Construction Emissions	0.56	4.21	0.08	0.07	15.9
BAAQMD Threshold of Significance	54	54	82	54	-
Potentially Significant?	No	No	No	No	-
SOURCE: CARB CalEEMod Version 2022.1.					

Impact 3.2.3: Would the Project operational activities result in a cumulatively considerable net increase of emissions of criteria air pollutants and precursors? (Less than Significant)

The operational impacts related to the Renovation Alternative would be similar to the Replacement Campus Project given that the campus square footage and number of students would be similar.

Impact 3.2-4: Would the Project expose sensitive receptors to substantial pollutant concentrations? (Less than Significant with Mitigation)

The construction health risk assessment (HRA) presents results of the health impacts associated with the following conditions:

A. Health impacts (cancer and non-cancer risk, and $PM_{2.5}$ concentration) at the existing Mill Valley Middle School due to construction of the interim campus

B. Health impacts (cancer and non-cancer risk, and $PM_{2.5}$ concentration) at existing residences due to construction of the interim campus and construction of the Renovation Alternative

C. Health impacts (cancer and non-cancer risk, and $PM_{2.5}$ concentration) at interim campus due to the construction of the Renovation Alternative

D. Health impacts (cancer and non-cancer risk, and $PM_{2.5}$ concentration) at Friends Field and Mill Valley Community Center due to the construction of the interim campus and of the Renovation Alternative

A.1 Construction Cancer Risk at Existing Mill Valley Middle School Due to Installation of the Interim Campus

The following describes the HRA results associated with existing middle school receptors due to unmitigated project construction activities and the installation of the interim campus. As shown in **Table 2**, the maximum cancer risk from unmitigated project construction emissions for a student receptor would be 1.2 per million and for a staff receptor would be 0.2 per million. Thus, the cancer risk due to unmitigated construction activities would be less than the BAAQMD threshold of 10 per million and would be **less than significant**.

TABLE 2 ESTIMATED UNMITIGATED CONSTRUCTION HEALTH IMPACTS AT EXISTING MILL VALLEY MIDDLE SCHOOL

Source	Cancer Risk (student/staff)	Hazard Impact (Acute/Chronic)	$PM_{2.5}$ Concentration
Proposed Project Construction - Combustion	1.15/0.24	-/0.02	0.08
Proposed Project Construction – Fugitive Dust	<0.01/<0.01	0.66/0.04	0.19
Proposed Project Construction – Total	**1.15/0.24**	**0.66/0.06**	**0.27**
Significance Threshold	10.0	1.00	0.30
Potentially Significant (Yes or No)?	No	No	No
SOURCE: RCH Group, 2025			

As shown in **Table 3**, with the implementation of **Mitigation Measures 3.2-1 through 3.2-8**, the maximum cancer risk from mitigated project construction for a student receptor would be less than 0.1 per million and for a staff receptor would be less than 0.1 per million. Thus, the cancer risk due to construction activities would be below the BAAQMD threshold of 10 per million and would be **less than significant**.

TABLE 3 ESTIMATED MITIGATED CONSTRUCTION HEALTH IMPACTS AT EXISTING MILL VALLEY MIDDLE SCHOOL

Source	Cancer Risk (student/staff)	Hazard Impact (Acute/Chronic)	$PM_{2.5}$ Concentration
Proposed Project Construction - Combustion	0.03/0.01	-/<0.01	<0.01
Proposed Project Construction – Fugitive Dust	<0.01/<0.01	0.05/<0.01	0.02
Proposed Project Construction – Total	**0.03/0.01**	**0.05/<0.01**	**0.02**
Significance Threshold	10.0	1.00	0.30
Potentially Significant (Yes or No)?	No	No	No
SOURCE: RCH Group, 2025			

A.2. Construction Non-Cancer Health Hazard at Existing Mill Valley Middle School

Both acute (short-term) and chronic (long-term) adverse health impacts unrelated to cancer are measured against a hazard index (HI), which is defined as the ratio of the predicted incremental DPM exposure concentration from the Project to a reference exposure level (REL) that could cause adverse health effects. The REL are published by OEHHA based on epidemiological research. The ratio (referred to as the Hazard Quotient [HQ]) of each non-carcinogenic substance that affects a certain organ system is added to produce an overall HI for that organ system. The overall HI is calculated for each organ system. The impact is considered to be significant if the overall HI for the highest-impacted organ system is greater than 1.0.

Of note, there is a cancer potency factor and a chronic hazard index, but no acute hazard index associated with DPM. The chronic reference exposure level for DPM was established by the California OEHHA as 5 $\mu g/m^3$. Thus, the Project annual concentration of DPM cannot exceed 5.0 $\mu g/m^3$; resulting in a chronic HI of greater than 1.0 (i.e., DPM annual concentration/5.0 $\mu g/m^3$). For the landfill fugitive dust, as applicable, the HRA applied cancer potency factors, acute hazard indexes, and/or chronic hazard indexes, depending on the particular contaminant of concern. The chronic hazard index and the acute hazard index are the same value for the child (student) compared to an adult (school staff); as these values are not a function of breathing rate and body weight, as with cancer risk.

The unmitigated acute HI would be 0.66 due to arsenic and nickel and other air toxics within the landfill fugitive dust. The mitigated acute HI would be 0.05. The acute HI would be below the project-level threshold of 1 and the impact of the project would therefore be **less than significant**.

The unmitigated chronic HI would be 0.06 due to DPM and landfill fugitive dust. The mitigated chronic HI would be less than 0.01. The chronic HI would be below the project-level threshold of 1 and the impact of the project would therefore be **less than significant**.

A.3. Construction $PM_{2.5}$ Concentration at Existing Mill Valley Middle School

Dispersion modeling also estimated the exposure of sensitive receptors to project-related concentrations of $PM_{2.5}$. The BAAQMD *Air Quality Guidelines* requires inclusion of $PM_{2.5}$ exhaust and fugitive dust emissions in this analysis. The project's unmitigated annual $PM_{2.5}$ concentration from construction activities would be 0.27 µg/m^3, which is **less than significant**. With implementation of **Mitigation Measures 3.2-1 through 3.2-8**, the annual $PM_{2.5}$ concentration would be reduced to 0.02 µg/m^3. Thus, the annual $PM_{2.5}$ concentration due to project construction (combustion exhaust and fugitive dust) would be below the BAAQMD threshold of 0.3 µg/m^3 and would be considered **less than significant**.

B.1. Construction Cancer Risk at Existing Residences Due to the Installation of the Interim Campus and Construction of the Renovation Alternative

The following describes the HRA results associated with existing residential receptors due to unmitigated construction activities. The maximum exposed individual residence (MEIR) due to Project construction is located along Camino Alto (west of the Project site). As shown in **Table 4**, the maximum cancer risk from unmitigated construction emissions for a residential-child receptor would be 12.9 per million and for a residential-adult receptor would be 0.8 per million. Thus, the cancer risk due to unmitigated construction activities are greater than the BAAQMD threshold of 10 per million and would be **potentially significant**.

TABLE 4 ESTIMATED UNMITIGATED CONSTRUCTION HEALTH IMPACTS AT EXISTING RESIDENCES

Source	Cancer Risk (child/adult)	Hazard Impact (Acute/Chronic)	$PM_{2.5}$ Concentration
Proposed Project Construction - Combustion	12.9/0.83	-/0.01	0.04
Proposed Project Construction – Fugitive Dust	0.01/<0.01	0.45/0.02	0.10
Proposed Project Construction – Total	**12.9/0.83**	**0.45/0.03**	**0.14**
Significance Threshold	10.0	1.00	0.30
Potentially Significant (Yes or No)?	**Yes**	No	No

SOURCE: RCH Group, 2025

As shown in **Table 5**, with the implementation of **Mitigation Measures 3.2-1 through 3.2-7**, the maximum cancer risk from mitigated construction for a residential-child receptor would be 2.9 per million and for a residential-adult receptor would be 0.2 per million. Thus, the cancer risk due to construction activities would be below the BAAQMD threshold of 10 per million and would be **less than significant with mitigation**.

TABLE 5 ESTIMATED MITIGATED CONSTRUCTION HEALTH IMPACTS AT EXISTING RESIDENCES

Source	Cancer Risk (child/adult)	Hazard Impact (Acute/Chronic)	$PM_{2.5}$ Concentration
Proposed Project Construction - Combustion	2.90/0.17	-/<0.01	0.01
Proposed Project Construction – Fugitive Dust	<0.01/<0.01	0.25/0.01	0.05
Proposed Project Construction – Total	**2.90/0.17**	**0.25/0.01**	**0.06**
Significance Threshold	10.0	1.00	0.30
Potentially Significant (Yes or No)?	No	No	No

SOURCE: RCH Group, 2025

B.2. Construction Non-Cancer Health Hazard at Existing Residences

The unmitigated acute HI would be 0.45 due to arsenic and nickel and other air toxics within the landfill fugitive dust. The mitigated acute HI would be 0.25. The acute HI would be below the project-level threshold of 1 and the impact of the project would therefore be **less than significant.**

The unmitigated chronic HI would be 0.03 due to DPM and landfill fugitive dust. The mitigated chronic HI would be 0.01. The chronic HI would be below the project-level threshold of 1 and the impact of the project would therefore be **less than significant**.

B.3. Construction $PM_{2.5}$ Concentration at Existing Residences

Dispersion modeling also estimated the exposure of sensitive receptors to project-related concentrations of $PM_{2.5}$. The BAAQMD *Air Quality Guidelines* requires inclusion of $PM_{2.5}$ exhaust and fugitive dust emissions in this analysis. The project's unmitigated annual $PM_{2.5}$ concentration from construction activities would be 0.14 µg/m^3, which is less than significant. With implementation of **Mitigation Measures 3.2-1 through 3.2-7**, the annual $PM_{2.5}$ concentration would be reduced to 0.06 µg/m^3. Thus, the annual $PM_{2.5}$ concentration due to project construction (combustion exhaust and fugitive dust) would be below the BAAQMD threshold of 0.3 µg/m^3 and would be considered **less than significant.**

C.1. Construction Cancer Risk at Interim Campus Due to the Construction of the Renovation Alternative

The following describes the HRA results associated with students/staff at the interim campus due to unmitigated construction activities. As shown in **Table 6**, the maximum cancer risk from unmitigated construction emissions for an interim campus student receptor would be 9.2 per million and an interim campus staff receptor would be 1.9 per million. Thus, the cancer risk due to unmitigated construction activities and the interim campus are less than the BAAQMD threshold of 10 per million and would be **less than significant**.

TABLE 6 ESTIMATED UNMITIGATED CONSTRUCTION HEALTH IMPACTS AT INTERIM CAMPUS

Source	Cancer Risk (student/staff)	Hazard Impact (Acute/Chronic)	Annual $PM_{2.5}$ Concentration
Proposed Project Construction - Combustion	9.24/1.92	-/0.06	0.23
Proposed Project Construction – Fugitive Dust	<0.01/<0.01	0.35/0.10	0.51
Proposed Project Construction – Total	**9.24/1.92**	**0.35/0.16**	**0.74**
Significance Threshold	10.0	1.00	0.30
Potentially Significant (Yes or No)?	No	No	**Yes**
SOURCE: RCH Group, 2025			

The following describes the HRA results associated with students/staff at the interim campus due to mitigated measures for construction activities (i.e., **Mitigation Measures 3.2-1 through 3.2-8**). **Table 7** presents the maximum cancer risk from mitigated construction emissions for an interim campus receptor would be 0.3 per million and an interim campus staff receptor would be less than 0.1 per million. Thus, the cancer risk due to construction activities and the interim campus would be less than the BAAQMD threshold of 10 per million and would be **less-than-signficant with mitigation.**

TABLE 7 ESTIMATED MITIGATED CONSTRUCTION HEALTH IMPACTS AT INTERIM CAMPUS

Source	Cancer Risk (student/staff)	Hazard Impact (Acute/Chronic)	Annual $PM_{2.5}$ Concentration
Proposed Project Construction - Combustion	0.28/0.06	-/<0.01	0.01
Proposed Project Construction – Fugitive Dust	<0.01/<0.01	0.03/0.01	0.04
Proposed Project Construction – Total	**0.28/0.06**	**0.03/0.01**	**0.05**
Significance Threshold	10.0	1.00	0.30
Potentially Significant (Yes or No)?	No	No	No
SOURCE: RCH Group, 2025			

C.2. Construction Non-Cancer Health Hazard at Interim Campus

The unmitigated acute HI would be 0.35 due to arsenic and nickel and other air toxics within the landfill fugitive dust. The mitigated acute HI would be 0.03. The acute HI would be below the project-level threshold of 1 and the Project impact would therefore be **less than significant.**

The unmitigated chronic HI would be 0.16 due to DPM and landfill fugitive dust. The mitigated chronic HI would be 0.01. The chronic HI would be below the project-level threshold of 1 and the impact of the Project would therefore be **less than significant**.

C.3. Construction $PM_{2.5}$ Concentration at Interim Campus

The Project's unmitigated annual $PM_{2.5}$ concentration from construction activities would be 0.74 $\mu g/m^3$, which is **potentially significant**. With implementation of **Mitigation Measures 3.2-1 through 3.2-8**, the annual $PM_{2.5}$ concentration would be reduced to 0.05 $\mu g/m^3$. Thus, the annual $PM_{2.5}$ concentration due to Project construction (combustion exhaust and fugitive dust) would be below the BAAQMD threshold of 0.3 $\mu g/m^3$ and would be **less than significant with mitigation**.

D.1. Construction Cancer Risk at Friends Field and Mill Valley Community Center Due to the Installation of the Interim Campus and Construction of the Renovation Alternative

Most outdoor activities, including sports and lunch activities, associated with the Project would occur at the Friends Field and Mill Valley Community Center, therefore the HRA analyzed those locations specifically to address community concerns. The following describes the HRA results associated with students/staff during outdoor activities at Friends Field and Mill Valley Community Center due to unmitigated construction activities and assumes 10 hours of exposure a day for 180 days a year over the entire construction duration which is substantially higher than would reasonably be expected to occur for lunch and sports activities.[3] As shown in **Table 8**, the maximum cancer risk from unmitigated construction emissions at the Friends Field and Mill Valley Community Center would be 2.5 per million. Thus, the cancer risk due to unmitigated Project construction activities would be less than the BAAQMD threshold of 10 per million, and would be **less than significant**.

TABLE 8 ESTIMATED UNMITIGATED CONSTRUCTION HEALTH IMPACTS AT FRIENDS FIELD AND MILL VALLEY COMMUNITY CENTER

Source	Cancer Risk	Hazard Impact (Acute/Chronic)	Annual $PM_{2.5}$ Concentration
Proposed Project Construction - Combustion	2.54	-/0.01	0.05
Proposed Project Construction – Fugitive Dust	<0.01	0.21/0.02	0.10
Proposed Project Construction – Total	**2.54**	**0.21/0.02**	**0.15**
Significance Threshold	10.0	1.00	0.30
Potentially Significant (Yes or No)?	No	No	No

SOURCE: RCH Group, 2025

The following describes the HRA results associated with students/staff at the Friends Field and Mill Valley Community Center due to mitigated measures for construction activities (i.e., **Mitigation Measures 3.2-1 through 3.2-7**). **Table 9** presents the maximum cancer risk from mitigated construction emissions for outdoor activities would be 0.5 per million. Thus, the cancer risk due to mitigated Project construction activities at the Friends Field and Mill Valley Community Center would be less than the BAAQMD threshold of 10 per million, and would be **less than significant.**

D.2. Construction Non-Cancer Health Hazard at Friends Field and Mill Valley Community Center

The unmitigated acute HI would be 0.21 due to arsenic and nickel and other air toxics within the landfill fugitive dust. The mitigated acute HI would be 0.11. The acute HI would be below the project-level threshold of 1 and the Project impact would therefore be **less than significant**.

The unmitigated chronic HI would be 0.02 due to DPM and landfill fugitive dust. The mitigated chronic HI would be 0.01. The chronic HI would be below the project-level threshold of 1 and the Project impact would therefore be **less than significant**.

[3] Project construction is anticipated to begin in June of 2026 and be completed by the end of October 2028. Construction activities would be conducted from 8 a.m. to 6 p.m.

TABLE 9 ESTIMATED MITIGATED CONSTRUCTION HEALTH IMPACTS AT FRIENDS FIELD AND MILL VALLEY COMMUNITY CENTER

Source	Cancer Risk	Hazard Impact (Acute/Chronic)	Annual $PM_{2.5}$ Concentration
Proposed Project Construction - Combustion	0.52	-/<0.01	0.01
Proposed Project Construction – Fugitive Dust	<0.01	0.11/0.01	0.05
Proposed Project Construction – Total	**0.52**	**0.11/0.01**	**0.06**
Significance Threshold	10.0	1.00	0.30
Potentially Significant (Yes or No)?	No	No	No

SOURCE: RCH Group, 2025

D.3. Construction $PM_{2.5}$ Concentration at Friends Field and Mill Valley Community Center

The Project's unmitigated annual $PM_{2.5}$ concentration from construction activities would be 0.15 µg/m^3, which is less than significant. With implementation of **Mitigation Measures 3.2-1 through 3.2-7**, the annual $PM_{2.5}$ concentration would be reduced to 0.06 µg/m^3. Thus, the annual $PM_{2.5}$ concentration due to Project construction (combustion exhaust and fugitive dust) with mitigation would be below the BAAQMD threshold of 0.3 µg/m^3 and would be **less than significant.**

With the implementation of **Mitigation Measure 3.2-1 through 3.2-8**, the construction-related health impacts associated with the Renovation Alternative would have a less than significant impact with migration.

Impact 3.2-5: Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people? (Significant and Unavoidable)

The odor impacts associated with the Renovation Alternative would be similar to the conclusion drawn for the Replacement Campus Project. The main building at the existing school is approximately 500 feet from the center of the SASM WWTP (defined as the trickling filters). The new portable buildings at the interim campus would be approximately 360 feet from the center of the SASM WWTP. Using general dilution estimates (as a function of distance from source), the outdoor concentrations of pollutants which cause odors such as hydrogen sulfide (H_2S) would be expected to be approximately 70 percent higher at the interim campus than at the existing school. This impact, as with the Replacement Campus Project, would be **potentially significant and unavoidable.**

The Renovation Alternative would have **significant and unavoidable** odor impacts because the magnitude and frequency of odor impacts at the (outdoor environment) interim campus and Renovation Alternative would potentially be greater than at the existing school. Within the indoor environmental for the interim and Renovation Alternative, the odor impacts indoors would be less than significant due to **Mitigation Measure 3.2-8 through 3.2-10**.

Conclusions

The air quality impacts, including health impacts, for the Renovation Alternative would be lower than the Replacement Campus Project. The total construction emissions for the Renovation Alternative are approximately 50 percent of the values associated with the Replacement Campus Project due to the

elimination of demolition activities, less grading activities, and less building construction. These lower emissions lead to a reduction in health impacts.

During unmitigated construction the maximum cancer risk from unmitigated construction emissions for an interim campus student receptor would be 9.2 per million (compared to 15.2) and an interim campus staff receptor would be 1.9 per million (compared to 3.2). During mitigated construction the maximum cancer risk from unmitigated construction emissions for an interim campus student receptor would be 0.3 per million (compared to 0.6) and an interim campus staff receptor would be 0.1 per million (compared to 0.2).

The results are similarly lower for the Renovation Alternative at other receptors (existing campus, nearby residences, and Friends Field) and other metrics such as acute and chronic hazards, and annual $PM_{2.5}$ concentrations, when compared to the Replacement Campus Project.

In conclusion, the air quality and health impacts for the Renovation Alternative would be **less than significant with mitigation**. As with the Replacement Campus Project, the odor impacts associated with the Renovation Alternative are **significant and unavoidable**.

Attachment A

Construction Emissions Inventory Supporting Information

CalEEMod Input Summary

CalEEMod Output Files

Mill Valley Middle School Renovation

CalEEMod Version 2022.1 Inputs

Project Characteristics

Start of Construction: June 15, 2026

End of Construction: October 31 , 2028

Operational Year: 2029

Location: Marin County

Air District: Bay Area Air Quality Management District

Utility Company: Pacific Gas & Electric (Electricity)

Land Use Setting: Suburban

Construction Specifics

The proposed project is expected to take approximately 31 months to complete in the following phases:

- Phase 1: Construction of Interim Campus
- Phase 2: Renovation of Existing Campus
    - Including Paving and Coating
- Phase 3: Removal of Interim Campus; Completion of Site Development

The existing school is composed of an approximately 92,000 square feet main building (which also houses the school district offices); three modular buildings totaling. 5,800 square feet that house the physical education classrooms and offices; five modular buildings that house the art, cafeteria, and band rooms; five modular buildings that house various classrooms; and a 15,500 square feet gym/multi-purpose facility. The school campus includes four on-campus parking areas with a total of 117 parking spaces, and the school district rents an additional 15 parking stalls from the church across Sycamore Avenue from the school campus.

The existing school has a capacity of approximately 1,200 students and has a current student population of approximately 765 students. There are about 80 District staff/teachers/administrators on the campus, including 22 District Office staff.

This alternative rehabilitates the existing Mill Valley Middle School buildings – both the Main Building (92,000 square feet) and the Multi-Purpose/Gymnasium Building (15,200 square feet) – addressing exterior and interior finish materials as well as infrastructure improvements such as

heating, ventilation and air conditioning, fire sprinklers and upgrades to electrical systems. This alternative anticipates removal of all existing portable buildings except for the Band Room at the project completion. Site improvements include solar canopies, outdoor learning spaces and improvements for safety and security (perimeter fencing). In addition, a small building for STEM education is proposed, roughly 4,000 square feet, at the north end of the existing main building. The new building is expected to house a capacity of 1,100 students.

In order to accommodate the building replacement project, the site will require construction of an interim campus. This campus would be constructed of 27 leased "portable" classroom buildings and support spaces comprising 44,160 square feet of new portable building space and accommodating 765 students. The existing thirteen portables on the school campus would remain as part of the interim campus, as would the existing gymnasium/multi-purpose building.

For the renovation alternative, an estimated 15,000 cubic yards of spoils requiring offsite disposal would be generated during construction, and 6,000 cubic yards of fill would be imported to the site (i.e., 25 percent of the values associated with the replacement project). For the interim campus, an estimated 14,300 cubic yards of spoils requiring offsite disposal would be generated during construction, and 3,500 cubic yards of fill would be imported to the site. Project construction would result in a total of 2.40 acres (or 25 percent of the replacement project value) and 1.38 acres (interim campus).[1] [2] Project construction is anticipated to begin in June of 2026 and be completed by the end of October 2028. Construction activities will take place between 8 am and 6 pm Monday through Friday.

Estimated Construction Schedule

Phase	Description	Start	End	Working Days
1A	Interim Campus Grading	6/15/2026	7/14/2026	22
1B	Installation of Interim Campus	7/15/2026	12/15/2026	110
2	Renovation Campus Grading	1/1/2027	1/29/2027	21
3A	Renovation of Existing Campus	1/1/2027	6/30/2028	391
3B	Parking Lot Paving	6/1/2028	6/30/2028	22
3C	Renovation Campus Coating	6/1/2028	6/30/2028	22
4	Removal of Interim Campus	7/1/2028	10/31/2028	87

SOURCE: CARB CalEEMod Version 2022.1.

[1] For the replacement project, the Grading Plan (dated May 23, 2025) developed an estimate of 74,270 cubic yards of spoils requiring offsite disposal would be generated during construction, and 27,487 cubic yards of fill would be imported to the site. Therefore, the air quality analysis and health risk assessment is conservative (provides an overestimate to the results).

[2] Mill Valley Middle School Reconstruction Hazardous Soil Volumetric Analysis, dated June 6, 2025

Estimated Construction Equipment Usage

Phase	Equipment	Amount	Daily Hours	HP	Load Factor
Interim Campus Grading	Excavators	1	8	36	0.38
Interim Campus Grading	Graders	1	8	148	0.41
Interim Campus Grading	Rubber Tired Dozers	1	8	367	0.40
Interim Campus Grading	Tractors/Loaders/Backhoes	3	8	84	0.37
Installation of Interim Campus	Cranes	1	7	367	0.29
Installation of Interim Campus	Forklifts	3	8	82	0.20
Installation of Interim Campus	Generator Sets	1	8	14	0.74
Installation of Interim Campus	Tractors/Loaders/Backhoes	3	7	84	0.37
Installation of Interim Campus	Welders	1	8	46	0.45
Renovation Campus Grading	Excavators	1	8	36	0.38
Renovation Campus Grading	Graders	1	8	148	0.41
Renovation Campus Grading	Rubber Tired Dozers	1	8	367	0.40
Renovation Campus Grading	Tractors/Loaders/Backhoes	3	8	84	0.37
Renovation of Existing Campus	Forklifts	3	8	82	0.20
Renovation of Existing Campus	Generator Sets	1	8	14	0.74
Renovation of Existing Campus	Tractors/Loaders/Backhoes	3	7	84	0.37
Renovation of Existing Campus	Welders	1	8	46	0.45
Parking Lot Paving	Pavers	2	8	81	0.42
Parking Lot Paving	Paving Equipment	2	8	89	0.36
Parking Lot Paving	Rollers	2	8	36	0.38
Renovation Campus Coating	Air Compressors	1	6	37	0.48
Removal of Interim Campus	Concrete/Industrial Saws	1	8	33	0.73
Removal of Interim Campus	Excavators	3	8	36	0.38
Removal of Interim Campus	Rubber Tired Dozers	2	8	367	0.40

SOURCE: CARB CalEEMod Version 2022.1.

Estimated Construction Vehicle Trips

Phase Name	Trip Type	One-Way Trips per Day	Miles per One Way Trip	Vehicle Mix
Interim Campus Grading	Worker	15	11.7	LDA,LDT1,LDT2
Interim Campus Grading	Hauling	29	20.0	HHDT
Installation of Interim Campus	Worker	90	11.7	LDA,LDT1,LDT2
Installation of Interim Campus	Vendor	16	8.4	HHDT,MHDT
Renovation Campus Grading	Worker	15	11.7	LDA,LDT1,LDT2
Renovation Campus Grading	Hauling	125	20.0	HHDT
Renovation of Existing Campus	Worker	45	11.7	LDA,LDT1,LDT2
Renovation of Existing Campus	Vendor	16	8.4	HHDT,MHDT
Parking Lot Paving	Worker	30	11.7	LDA,LDT1,LDT2
Renovation Campus Coating	Worker	5	11.7	LDA,LDT1,LDT2
Removal of Interim Campus	Worker	30	11.7	LDA,LDT1,LDT2
Removal of Interim Campus	Hauling	10	20.0	HHDT

SOURCE: CARB CalEEMod Version 2022.1.

Utility Information

Greenhouse Gas intensity factor: 203 pounds of CO_2e per MWh (Pacific Gas & Electric)

Mitigation Measures

Use Advanced Engine Tiers

Water Exposed Surfaces

Water Active Demolition Sites

Water Unpaved Construction Roads

Limit Vehicle Speeds on Unpaved Roads

Sweep Paved Roads

Establish Onsite Renewable Energy Systems: Solar Power

Mill Valley Middle School Redevelopment - Temporary and Renovation Buildout Custom Report

Table of Contents

1. Basic Project Information

1.1. Basic Project Information

1.2. Land Use Types

1.3. User-Selected Emission Reduction Measures by Emissions Sector

2. Emissions Summary

2.1. Construction Emissions Compared Against Thresholds

2.2. Construction Emissions by Year, Unmitigated

2.3. Construction Emissions by Year, Mitigated

3. Construction Emissions Details

3.1. Removal of Temporary Campus (2028) - Unmitigated

3.2. Removal of Temporary Campus (2028) - Mitigated

3.3. Grading (2027) - Unmitigated

3.4. Grading (2027) - Mitigated

3.5. Interim Grading (2026) - Unmitigated

3.6. Interim Grading (2026) - Mitigated

3.7. Renovation (2027) - Unmitigated

3.8. Renovation (2027) - Mitigated

3.9. Renovation (2028) - Unmitigated

3.10. Renovation (2028) - Mitigated

3.11. Temporary Campus (2026) - Unmitigated

3.12. Temporary Campus (2026) - Mitigated

3.13. Parking Lot (2028) - Unmitigated

3.14. Parking Lot (2028) - Mitigated

3.15. Coating (2028) - Unmitigated

3.16. Coating (2028) - Mitigated

4. Operations Emissions Details

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

4.10.4. Soil Carbon Accumulation By Vegetation Type - Mitigated

4.10.5. Above and Belowground Carbon Accumulation by Land Use Type - Mitigated

4.10.6. Avoided and Sequestered Emissions by Species - Mitigated

5. Activity Data

5.1. Construction Schedule

5.2. Off-Road Equipment

5.2.1. Unmitigated

5.2.2. Mitigated

5.3. Construction Vehicles

5.3.1. Unmitigated

5.3.2. Mitigated

5.4. Vehicles

5.4.1. Construction Vehicle Control Strategies

5.5. Architectural Coatings

5.6. Dust Mitigation

5.6.1. Construction Earthmoving Activities

5.6.2. Construction Earthmoving Control Strategies

5.7. Construction Paving

5.8. Construction Electricity Consumption and Emissions Factors

5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

5.18.1.2. Mitigated

5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

5.18.1.2. Mitigated

5.18.2. Sequestration

5.18.2.1. Unmitigated

5.18.2.2. Mitigated

6. Climate Risk Detailed Report

6.1. Climate Risk Summary

6.2. Initial Climate Risk Scores

6.3. Adjusted Climate Risk Scores

7. Health and Equity Details

7.1. CalEnviroScreen 4.0 Scores

7.2. Healthy Places Index Scores

7.3. Overall Health & Equity Scores

7.4. Health & Equity Measures

7.5. Evaluation Scorecard

7.6. Health & Equity Custom Measures

8. User Changes to Default Data

1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	Mill Valley Middle School Redevelopment - Temporary and Renovation Buildout
Construction Start Date	4/1/2026
Lead Agency	Mill Valley School District Board
Land Use Scale	Project/site
Analysis Level for Defaults	County
Windspeed (m/s)	3.90
Precipitation (days)	34.8
Location	37.89742968729293, -122.52874481756453
County	Marin
City	Mill Valley
Air District	Bay Area AQMD
Air Basin	San Francisco Bay Area
TAZ	932
EDFZ	2
Electric Utility	Pacific Gas & Electric Company
Gas Utility	Pacific Gas & Electric
App Version	2022.1.1.30

1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description
Junior High School	1,100	Student	9.57	87,000	0.00	0.00	—	—
Parking Lot	117	Space	1.05	0.00	0.00	0.00	—	—

1.3. User-Selected Emission Reduction Measures by Emissions Sector

Sector	#	Measure Title
Construction	C-2*	Limit Heavy-Duty Diesel Vehicle Idling
Construction	C-4*	Use Local and Sustainable Building Materials
Construction	C-5	Use Advanced Engine Tiers
Construction	C-10-A	Water Exposed Surfaces
Construction	C-10-B	Water Active Demolition Sites
Construction	C-10-C	Water Unpaved Construction Roads
Construction	C-11	Limit Vehicle Speeds on Unpaved Roads
Construction	C-12	Sweep Paved Roads
Construction	C-13	Use Low-VOC Paints for Construction
Energy	E-10-B	Establish Onsite Renewable Energy Systems: Solar Power

* Qualitative or supporting measure. Emission reductions not included in the mitigated emissions results.

2. Emissions Summary

2.1. Construction Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	6.73	6.38	20.6	24.2	0.04	0.78	7.82	8.51	0.72	3.61	4.23	—	5,159	5,159	0.38	0.36	4.67	5,281
Mit.	3.22	3.14	5.66	25.0	0.04	0.09	3.46	3.55	0.09	1.51	1.59	—	5,159	5,159	0.38	0.36	4.67	5,281
% Reduced	52%	51%	73%	-3%	—	88%	56%	58%	87%	58%	62%	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Unmit.	4.32	2.67	34.5	37.4	0.10	0.93	10.2	11.1	0.87	4.22	5.09	—	14,262	14,262	1.32	1.53	0.51	14,752
Mit.	2.13	0.90	18.2	38.1	0.10	0.23	5.78	6.01	0.23	2.12	2.35	—	14,262	14,262	1.32	1.53	0.51	14,752
% Reduced	51%	66%	47%	-2%	—	75%	43%	46%	74%	50%	54%	—	—	—	—	—	—	—
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.37	1.17	7.85	9.99	0.02	0.27	0.90	1.10	0.25	0.32	0.50	—	2,340	2,340	0.15	0.15	1.12	2,388
Mit.	0.46	0.41	3.07	10.2	0.02	0.06	0.64	0.70	0.05	0.20	0.25	—	2,340	2,340	0.15	0.15	1.12	2,388
% Reduced	66%	65%	61%	-2%	—	80%	28%	36%	79%	38%	50%	—	—	—	—	—	—	—
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.25	0.21	1.43	1.82	< 0.005	0.05	0.16	0.20	0.05	0.06	0.09	—	387	387	0.02	0.02	0.19	395
Mit.	0.08	0.08	0.56	1.87	< 0.005	0.01	0.12	0.13	0.01	0.04	0.05	—	387	387	0.02	0.02	0.19	395
% Reduced	66%	65%	61%	-2%	—	80%	28%	36%	79%	38%	50%	—	—	—	—	—	—	—

2.2. Construction Emissions by Year, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Year	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	2.33	1.74	18.0	19.8	0.04	0.68	7.82	8.51	0.62	3.61	4.23	—	5,159	5,159	0.38	0.36	4.67	5,281
2027	1.06	0.86	7.19	12.1	0.02	0.22	0.49	0.71	0.21	0.12	0.33	—	2,337	2,337	0.11	0.09	2.24	2,368
2028	6.73	6.38	20.6	24.2	0.04	0.78	0.97	1.75	0.72	0.19	0.91	—	4,364	4,364	0.23	0.14	2.93	4,415
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	1.64	1.36	10.7	16.3	0.03	0.38	0.86	1.24	0.35	0.21	0.56	—	3,549	3,549	0.15	0.11	0.10	3,587
2027	4.32	2.67	34.5	37.4	0.10	0.93	10.2	11.1	0.87	4.22	5.09	—	14,262	14,262	1.32	1.53	0.51	14,752

2028	2.81	2.29	20.7	20.1	0.04	0.78	0.97	1.75	0.72	0.19	0.91	—	4,348	4,348	0.23	0.15	0.05	4,399
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	0.63	0.51	4.32	6.06	0.01	0.16	0.72	0.88	0.14	0.28	0.42	—	1,381	1,381	0.07	0.06	0.63	1,400
2027	0.94	0.72	6.72	9.99	0.02	0.20	0.90	1.10	0.19	0.32	0.50	—	2,340	2,340	0.15	0.15	1.12	2,388
2028	1.37	1.17	7.85	9.73	0.02	0.27	0.42	0.69	0.25	0.09	0.34	—	1,970	1,970	0.10	0.07	0.54	1,993
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	0.12	0.09	0.79	1.11	< 0.005	0.03	0.13	0.16	0.03	0.05	0.08	—	229	229	0.01	0.01	0.10	232
2027	0.17	0.13	1.23	1.82	< 0.005	0.04	0.16	0.20	0.03	0.06	0.09	—	387	387	0.02	0.02	0.19	395
2028	0.25	0.21	1.43	1.78	< 0.005	0.05	0.08	0.13	0.05	0.02	0.06	—	326	326	0.02	0.01	0.09	330

2.3. Construction Emissions by Year, Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Year	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	0.73	0.66	5.02	20.1	0.04	0.09	3.46	3.55	0.08	1.51	1.59	—	5,159	5,159	0.38	0.36	4.67	5,281
2027	0.47	0.40	3.06	12.4	0.02	0.06	0.49	0.55	0.06	0.12	0.18	—	2,337	2,337	0.11	0.09	2.24	2,368
2028	3.22	3.14	5.66	25.0	0.04	0.09	0.78	0.87	0.09	0.19	0.28	—	4,364	4,364	0.23	0.14	2.93	4,415
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	0.71	0.62	3.71	18.1	0.03	0.08	0.86	0.94	0.08	0.21	0.28	—	3,549	3,549	0.15	0.11	0.10	3,587
2027	2.13	0.90	18.2	38.1	0.10	0.23	5.78	6.01	0.23	2.12	2.35	—	14,262	14,262	1.32	1.53	0.51	14,752
2028	0.56	0.46	5.57	19.6	0.04	0.07	0.78	0.85	0.07	0.16	0.23	—	4,348	4,348	0.23	0.15	0.05	4,399
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	0.25	0.21	1.42	6.64	0.01	0.03	0.46	0.49	0.03	0.15	0.18	—	1,381	1,381	0.07	0.06	0.63	1,400
2027	0.43	0.31	3.07	10.2	0.02	0.06	0.64	0.70	0.05	0.20	0.25	—	2,340	2,340	0.15	0.15	1.12	2,388

2028	0.46	0.41	2.57	9.75	0.02	0.04	0.37	0.41	0.04	0.08	0.12	—	1,970	1,970	0.10	0.07	0.54	1,993
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	0.05	0.04	0.26	1.21	< 0.005	0.01	0.08	0.09	0.01	0.03	0.03	—	229	229	0.01	0.01	0.10	232
2027	0.08	0.06	0.56	1.87	< 0.005	0.01	0.12	0.13	0.01	0.04	0.05	—	387	387	0.02	0.02	0.19	395
2028	0.08	0.08	0.47	1.78	< 0.005	0.01	0.07	0.08	0.01	0.02	0.02	—	326	326	0.02	0.01	0.09	330

3. Construction Emissions Details

3.1. Removal of Temporary Campus (2028) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	2.61	2.19	19.6	18.7	0.03	0.78	—	0.78	0.71	—	0.71	—	3,429	3,429	0.14	0.03	—	3,440
Demolition	—	—	—	—	—	—	0.53	0.53	—	0.08	0.08	—	—	—	—	—	—	—
Onsite truck	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	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	2.61	2.19	19.6	18.7	0.03	0.78	—	0.78	0.71	—	0.71	—	3,429	3,429	0.14	0.03	—	3,440
Demolition	—	—	—	—	—	—	0.53	0.53	—	0.08	0.08	—	—	—	—	—	—	—

Onsite truck	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	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.62	0.52	4.67	4.45	0.01	0.18	—	0.18	0.17	—	0.17	—	817	817	0.03	0.01	—	820
Demolition	—	—	—	—	—	—	0.13	0.13	—	0.02	0.02	—	—	—	—	—	—	—
Onsite truck	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	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.11	0.10	0.85	0.81	< 0.005	0.03	—	0.03	0.03	—	0.03	—	135	135	0.01	< 0.005	—	136
Demolition	—	—	—	—	—	—	0.02	0.02	—	< 0.005	< 0.005	—	—	—	—	—	—	—
Onsite truck	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	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.10	0.09	0.06	0.96	0.00	0.00	0.25	0.25	0.00	0.06	0.06	—	245	245	< 0.005	< 0.005	0.78	246
Vendor	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	0.00
Hauling	0.10	0.01	0.94	0.59	< 0.005	0.01	0.19	0.20	0.01	0.05	0.06	—	691	691	0.08	0.11	1.24	728
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.10	0.09	0.07	0.86	0.00	0.00	0.25	0.25	0.00	0.06	0.06	—	228	228	0.01	0.01	0.02	231
Vendor	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	0.00
Hauling	0.10	0.01	0.99	0.59	< 0.005	0.01	0.19	0.20	0.01	0.05	0.06	—	691	691	0.08	0.11	0.03	727

Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.02	0.02	0.02	0.20	0.00	0.00	0.06	0.06	0.00	0.01	0.01	—	54.7	54.7	< 0.005	< 0.005	0.08	55.5
Vendor	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	0.00
Hauling	0.02	< 0.005	0.23	0.14	< 0.005	< 0.005	0.04	0.05	< 0.005	0.01	0.01	—	165	165	0.02	0.03	0.13	173
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.04	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	9.05	9.05	< 0.005	< 0.005	0.01	9.18
Vendor	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	0.00
Hauling	< 0.005	< 0.005	0.04	0.03	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	27.3	27.3	< 0.005	< 0.005	0.02	28.7

3.2. Removal of Temporary Campus (2028) - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.36	0.36	4.51	18.2	0.03	0.06	—	0.06	0.06	—	0.06	—	3,429	3,429	0.14	0.03	—	3,440
Demolition	—	—	—	—	—	—	0.34	0.34	—	0.05	0.05	—	—	—	—	—	—	—
Onsite truck	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	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.36	0.36	4.51	18.2	0.03	0.06	—	0.06	0.06	—	0.06	—	3,429	3,429	0.14	0.03	—	3,440

Demolition	—	—	—	—	—	—	0.34	0.34	—	0.05	0.05	—	—	—	—	—	—	—
Onsite truck	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	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.09	0.09	1.07	4.33	0.01	0.02	—	0.02	0.02	—	0.02	—	817	817	0.03	0.01	—	820
Demolition	—	—	—	—	—	—	0.08	0.08	—	0.01	0.01	—	—	—	—	—	—	—
Onsite truck	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	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.02	0.20	0.79	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	135	135	0.01	< 0.005	—	136
Demolition	—	—	—	—	—	—	0.01	0.01	—	< 0.005	< 0.005	—	—	—	—	—	—	—
Onsite truck	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	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.10	0.09	0.06	0.96	0.00	0.00	0.25	0.25	0.00	0.06	0.06	—	245	245	< 0.005	< 0.005	0.78	246
Vendor	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	0.00
Hauling	0.10	0.01	0.94	0.59	< 0.005	0.01	0.19	0.20	0.01	0.05	0.06	—	691	691	0.08	0.11	1.24	728
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.10	0.09	0.07	0.86	0.00	0.00	0.25	0.25	0.00	0.06	0.06	—	228	228	0.01	0.01	0.02	231
Vendor	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	0.00

Hauling	0.10	0.01	0.99	0.59	< 0.005	0.01	0.19	0.20	0.01	0.05	0.06	—	691	691	0.08	0.11	0.03	727
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.02	0.02	0.02	0.20	0.00	0.00	0.06	0.06	0.00	0.01	0.01	—	54.7	54.7	< 0.005	< 0.005	0.08	55.5
Vendor	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	0.00
Hauling	0.02	< 0.005	0.23	0.14	< 0.005	< 0.005	0.04	0.05	< 0.005	0.01	0.01	—	165	165	0.02	0.03	0.13	173
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.04	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	9.05	9.05	< 0.005	< 0.005	0.01	9.18
Vendor	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	0.00
Hauling	< 0.005	< 0.005	0.04	0.03	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	27.3	27.3	< 0.005	< 0.005	0.02	28.7

3.3. Grading (2027) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.89	1.59	14.2	17.3	0.03	0.60	—	0.60	0.55	—	0.55	—	2,960	2,960	0.12	0.02	—	2,970
Dust From Material Movement	—	—	—	—	—	—	7.18	7.18	—	3.44	3.44	—	—	—	—	—	—	—
Onsite truck	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	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Roa Equipment	0.11	0.09	0.82	0.99	< 0.005	0.03	—	0.03	0.03	—	0.03	—	170	170	0.01	< 0.005	—	171
Dust From Material Movement	—	—	—	—	—	—	0.41	0.41	—	0.20	0.20	—	—	—	—	—	—	—
Onsite truck	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	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Roa d Equipm ent	0.02	0.02	0.15	0.18	< 0.005	0.01	—	0.01	0.01	—	0.01	—	28.2	28.2	< 0.005	< 0.005	—	28.3
Dust From Material Movement	—	—	—	—	—	—	0.08	0.08	—	0.04	0.04	—	—	—	—	—	—	—
Onsite truck	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	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.05	0.04	0.04	0.46	0.00	0.00	0.12	0.12	0.00	0.03	0.03	—	116	116	< 0.005	0.01	0.01	118
Vendor	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	0.00
Hauling	1.33	0.18	13.0	7.64	0.06	0.11	2.37	2.48	0.11	0.63	0.74	—	8,874	8,874	1.09	1.41	0.44	9,322
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.03	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	6.71	6.71	< 0.005	< 0.005	0.01	6.81
Vendor	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	0.00
Hauling	0.08	0.01	0.74	0.44	< 0.005	0.01	0.13	0.14	0.01	0.04	0.04	—	510	510	0.06	0.08	0.42	537
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	1.11	1.11	< 0.005	< 0.005	< 0.005	1.13
Vendor	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	0.00
Hauling	0.01	< 0.005	0.13	0.08	< 0.005	< 0.005	0.02	0.03	< 0.005	0.01	0.01	—	84.5	84.5	0.01	0.01	0.07	88.9

3.4. Grading (2027) - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.29	0.29	2.04	17.8	0.03	0.06	—	0.06	0.06	—	0.06	—	2,960	2,960	0.12	0.02	—	2,970
Dust From Material Movement	—	—	—	—	—	—	2.80	2.80	—	1.34	1.34	—	—	—	—	—	—	—
Onsite truck	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	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.02	0.12	1.02	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	170	170	0.01	< 0.005	—	171
Dust From Material Movement	—	—	—	—	—	—	0.16	0.16	—	0.08	0.08	—	—	—	—	—	—	—

Onsite truck	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	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.02	0.19	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	28.2	28.2	< 0.005	< 0.005	—	28.3
Dust From Material Movement	—	—	—	—	—	—	0.03	0.03	—	0.01	0.01	—	—	—	—	—	—	—
Onsite truck	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	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.05	0.04	0.04	0.46	0.00	0.00	0.12	0.12	0.00	0.03	0.03	—	116	116	< 0.005	0.01	0.01	118
Vendor	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	0.00
Hauling	1.33	0.18	13.0	7.64	0.06	0.11	2.37	2.48	0.11	0.63	0.74	—	8,874	8,874	1.09	1.41	0.44	9,322
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.03	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	6.71	6.71	< 0.005	< 0.005	0.01	6.81
Vendor	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	0.00
Hauling	0.08	0.01	0.74	0.44	< 0.005	0.01	0.13	0.14	0.01	0.04	0.04	—	510	510	0.06	0.08	0.42	537
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	1.11	1.11	< 0.005	< 0.005	< 0.005	1.13
Vendor	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	0.00
Hauling	0.01	< 0.005	0.13	0.08	< 0.005	< 0.005	0.02	0.03	< 0.005	0.01	0.01	—	84.5	84.5	0.01	0.01	0.07	88.9

3.5. Interim Grading (2026) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.96	1.65	15.0	17.4	0.03	0.65	—	0.65	0.59	—	0.59	—	2,960	2,960	0.12	0.02	—	2,970
Dust From Material Movement	—	—	—	—	—	—	7.16	7.16	—	3.44	3.44	—	—	—	—	—	—	—
Onsite truck	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	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.12	0.10	0.90	1.05	< 0.005	0.04	—	0.04	0.04	—	0.04	—	178	178	0.01	< 0.005	—	179
Dust From Material Movement	—	—	—	—	—	—	0.43	0.43	—	0.21	0.21	—	—	—	—	—	—	—
Onsite truck	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	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road Equipment	0.02	0.02	0.16	0.19	< 0.005	0.01	—	0.01	0.01	—	0.01	—	29.5	29.5	< 0.005	< 0.005	—	29.6
Dust From Material Movement	—	—	—	—	—	—	0.08	0.08	—	0.04	0.04	—	—	—	—	—	—	—
Onsite truck	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	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.05	0.05	0.03	0.55	0.00	0.00	0.12	0.12	0.00	0.03	0.03	—	127	127	< 0.005	< 0.005	0.48	129
Vendor	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	0.00
Hauling	0.32	0.04	2.95	1.77	0.01	0.04	0.54	0.58	0.03	0.14	0.17	—	2,072	2,072	0.26	0.33	4.19	2,183
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.03	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	7.16	7.16	< 0.005	< 0.005	0.01	7.27
Vendor	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	0.00
Hauling	0.02	< 0.005	0.18	0.11	< 0.005	< 0.005	0.03	0.03	< 0.005	0.01	0.01	—	125	125	0.02	0.02	0.11	131
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	1.19	1.19	< 0.005	< 0.005	< 0.005	1.20
Vendor	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	0.00
Hauling	< 0.005	< 0.005	0.03	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	20.7	20.7	< 0.005	< 0.005	0.02	21.8

3.6. Interim Grading (2026) - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.29	0.29	2.04	17.8	0.03	0.06	—	0.06	0.06	—	0.06	—	2,960	2,960	0.12	0.02	—	2,970
Dust From Material Movement	—	—	—	—	—	—	2.79	2.79	—	1.34	1.34	—	—	—	—	—	—	—
Onsite truck	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	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.02	0.12	1.07	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	178	178	0.01	< 0.005	—	179
Dust From Material Movement	—	—	—	—	—	—	0.17	0.17	—	0.08	0.08	—	—	—	—	—	—	—
Onsite truck	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	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.02	0.20	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	29.5	29.5	< 0.005	< 0.005	—	29.6

Dust From Material Movement	—	—	—	—	—	—	0.03	0.03	—	0.01	0.01	—	—	—	—	—	—	—
Onsite truck	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	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.05	0.05	0.03	0.55	0.00	0.00	0.12	0.12	0.00	0.03	0.03	—	127	127	< 0.005	< 0.005	0.48	129
Vendor	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	0.00
Hauling	0.32	0.04	2.95	1.77	0.01	0.04	0.54	0.58	0.03	0.14	0.17	—	2,072	2,072	0.26	0.33	4.19	2,183
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.03	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	7.16	7.16	< 0.005	< 0.005	0.01	7.27
Vendor	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	0.00
Hauling	0.02	< 0.005	0.18	0.11	< 0.005	< 0.005	0.03	0.03	< 0.005	0.01	0.01	—	125	125	0.02	0.02	0.11	131
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	1.19	1.19	< 0.005	< 0.005	< 0.005	1.20
Vendor	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	0.00
Hauling	< 0.005	< 0.005	0.03	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	20.7	20.7	< 0.005	< 0.005	0.02	21.8

3.7. Renovation (2027) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.85	0.71	6.52	10.3	0.02	0.22	—	0.22	0.20	—	0.20	—	1,531	1,531	0.06	0.01	—	1,536
Onsite truck	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	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.85	0.71	6.52	10.3	0.02	0.22	—	0.22	0.20	—	0.20	—	1,531	1,531	0.06	0.01	—	1,536
Onsite truck	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	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.61	0.51	4.66	7.33	0.01	0.16	—	0.16	0.14	—	0.14	—	1,093	1,093	0.04	0.01	—	1,097
Onsite truck	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	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.11	0.09	0.85	1.34	< 0.005	0.03	—	0.03	0.03	—	0.03	—	181	181	0.01	< 0.005	—	182
Onsite truck	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	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Worker	0.15	0.14	0.10	1.53	0.00	0.00	0.37	0.37	0.00	0.09	0.09	—	374	374	0.01	0.01	1.30	380
Vendor	0.05	0.02	0.57	0.34	< 0.005	0.01	0.12	0.12	0.01	0.03	0.04	—	432	432	0.04	0.06	0.94	453
Hauling	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	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.15	0.13	0.11	1.37	0.00	0.00	0.37	0.37	0.00	0.09	0.09	—	349	349	0.01	0.02	0.03	354
Vendor	0.05	0.02	0.60	0.35	< 0.005	0.01	0.12	0.12	0.01	0.03	0.04	—	433	433	0.04	0.06	0.02	452
Hauling	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	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.10	0.09	0.08	0.95	0.00	0.00	0.26	0.26	0.00	0.06	0.06	—	250	250	0.01	0.01	0.40	254
Vendor	0.04	0.01	0.42	0.24	< 0.005	< 0.005	0.08	0.09	< 0.005	0.02	0.03	—	309	309	0.03	0.04	0.29	323
Hauling	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	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.02	0.02	0.01	0.17	0.00	0.00	0.05	0.05	0.00	0.01	0.01	—	41.4	41.4	< 0.005	< 0.005	0.07	42.0
Vendor	0.01	< 0.005	0.08	0.04	< 0.005	< 0.005	0.01	0.02	< 0.005	< 0.005	< 0.005	—	51.1	51.1	< 0.005	0.01	0.05	53.5
Hauling	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	0.00

3.8. Renovation (2027) - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.27	0.25	2.39	10.6	0.02	0.06	—	0.06	0.06	—	0.06	—	1,531	1,531	0.06	0.01	—	1,536

Onsite truck	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	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.27	0.25	2.39	10.6	0.02	0.06	—	0.06	0.06	—	0.06	—	1,531	1,531	0.06	0.01	—	1,536
Onsite truck	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	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.19	0.18	1.71	7.54	0.01	0.04	—	0.04	0.04	—	0.04	—	1,093	1,093	0.04	0.01	—	1,097
Onsite truck	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	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.03	0.03	0.31	1.38	< 0.005	0.01	—	0.01	0.01	—	0.01	—	181	181	0.01	< 0.005	—	182
Onsite truck	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	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.15	0.14	0.10	1.53	0.00	0.00	0.37	0.37	0.00	0.09	0.09	—	374	374	0.01	0.01	1.30	380
Vendor	0.05	0.02	0.57	0.34	< 0.005	0.01	0.12	0.12	0.01	0.03	0.04	—	432	432	0.04	0.06	0.94	453
Hauling	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	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Worker	0.15	0.13	0.11	1.37	0.00	0.00	0.37	0.37	0.00	0.09	0.09	—	349	349	0.01	0.02	0.03	354
Vendor	0.05	0.02	0.60	0.35	< 0.005	0.01	0.12	0.12	0.01	0.03	0.04	—	433	433	0.04	0.06	0.02	452
Hauling	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	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.10	0.09	0.08	0.95	0.00	0.00	0.26	0.26	0.00	0.06	0.06	—	250	250	0.01	0.01	0.40	254
Vendor	0.04	0.01	0.42	0.24	< 0.005	< 0.005	0.08	0.09	< 0.005	0.02	0.03	—	309	309	0.03	0.04	0.29	323
Hauling	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	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.02	0.02	0.01	0.17	0.00	0.00	0.05	0.05	0.00	0.01	0.01	—	41.4	41.4	< 0.005	< 0.005	0.07	42.0
Vendor	0.01	< 0.005	0.08	0.04	< 0.005	< 0.005	0.01	0.02	< 0.005	< 0.005	< 0.005	—	51.1	51.1	< 0.005	0.01	0.05	53.5
Hauling	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	0.00

3.9. Renovation (2028) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.82	0.68	6.29	10.3	0.02	0.19	—	0.19	0.18	—	0.18	—	1,531	1,531	0.06	0.01	—	1,536
Onsite truck	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	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road Equipment	0.82	0.68	6.29	10.3	0.02	0.19	—	0.19	0.18	—	0.18	—	1,531	1,531	0.06	0.01	—	1,536
Onsite truck	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	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.29	0.24	2.24	3.65	0.01	0.07	—	0.07	0.06	—	0.06	—	545	545	0.02	< 0.005	—	547
Onsite truck	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	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.05	0.04	0.41	0.67	< 0.005	0.01	—	0.01	0.01	—	0.01	—	90.3	90.3	< 0.005	< 0.005	—	90.6
Onsite truck	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	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.15	0.13	0.08	1.44	0.00	0.00	0.37	0.37	0.00	0.09	0.09	—	367	367	0.01	< 0.005	1.18	369
Vendor	0.05	0.01	0.54	0.32	< 0.005	0.01	0.12	0.12	0.01	0.03	0.04	—	421	421	0.03	0.06	0.84	441
Hauling	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	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.14	0.13	0.11	1.30	0.00	0.00	0.37	0.37	0.00	0.09	0.09	—	343	343	0.01	0.01	0.03	347
Vendor	0.05	0.01	0.57	0.33	< 0.005	0.01	0.12	0.12	0.01	0.03	0.04	—	421	421	0.03	0.06	0.02	440
Hauling	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	0.00

Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.05	0.05	0.04	0.45	0.00	0.00	0.13	0.13	0.00	0.03	0.03	—	122	122	< 0.005	0.01	0.18	124
Vendor	0.02	< 0.005	0.20	0.12	< 0.005	< 0.005	0.04	0.04	< 0.005	0.01	0.01	—	150	150	0.01	0.02	0.13	157
Hauling	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	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.01	0.08	0.00	0.00	0.02	0.02	0.00	0.01	0.01	—	20.3	20.3	< 0.005	< 0.005	0.03	20.6
Vendor	< 0.005	< 0.005	0.04	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	24.8	24.8	< 0.005	< 0.005	0.02	26.0
Hauling	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	0.00

3.10. Renovation (2028) - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.27	0.25	2.39	10.6	0.02	0.06	—	0.06	0.06	—	0.06	—	1,531	1,531	0.06	0.01	—	1,536
Onsite truck	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	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.27	0.25	2.39	10.6	0.02	0.06	—	0.06	0.06	—	0.06	—	1,531	1,531	0.06	0.01	—	1,536
Onsite truck	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	0.00

Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.09	0.09	0.85	3.76	0.01	0.02	—	0.02	0.02	—	0.02	—	545	545	0.02	< 0.005	—	547
Onsite truck	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	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.02	0.16	0.69	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	90.3	90.3	< 0.005	< 0.005	—	90.6
Onsite truck	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	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.15	0.13	0.08	1.44	0.00	0.00	0.37	0.37	0.00	0.09	0.09	—	367	367	0.01	< 0.005	1.18	369
Vendor	0.05	0.01	0.54	0.32	< 0.005	0.01	0.12	0.12	0.01	0.03	0.04	—	421	421	0.03	0.06	0.84	441
Hauling	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	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.14	0.13	0.11	1.30	0.00	0.00	0.37	0.37	0.00	0.09	0.09	—	343	343	0.01	0.01	0.03	347
Vendor	0.05	0.01	0.57	0.33	< 0.005	0.01	0.12	0.12	0.01	0.03	0.04	—	421	421	0.03	0.06	0.02	440
Hauling	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	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.05	0.05	0.04	0.45	0.00	0.00	0.13	0.13	0.00	0.03	0.03	—	122	122	< 0.005	0.01	0.18	124
Vendor	0.02	< 0.005	0.20	0.12	< 0.005	< 0.005	0.04	0.04	< 0.005	0.01	0.01	—	150	150	0.01	0.02	0.13	157
Hauling	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	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Worker	0.01	0.01	0.01	0.08	0.00	0.00	0.02	0.02	0.00	0.01	0.01	—	20.3	20.3	< 0.005	< 0.005	0.03	20.6
Vendor	< 0.005	< 0.005	0.04	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	24.8	24.8	< 0.005	< 0.005	0.02	26.0
Hauling	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	0.00

3.11. Temporary Campus (2026) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.28	1.07	9.85	13.0	0.02	0.38	—	0.38	0.35	—	0.35	—	2,397	2,397	0.10	0.02	—	2,405
Onsite truck	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	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.28	1.07	9.85	13.0	0.02	0.38	—	0.38	0.35	—	0.35	—	2,397	2,397	0.10	0.02	—	2,405
Onsite truck	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	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.39	0.32	2.97	3.91	0.01	0.11	—	0.11	0.10	—	0.10	—	722	722	0.03	0.01	—	725
Onsite truck	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	0.00

Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.07	0.06	0.54	0.71	< 0.005	0.02	—	0.02	0.02	—	0.02	—	120	120	< 0.005	< 0.005	—	120
Onsite truck	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	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.32	0.31	0.19	3.28	0.00	0.00	0.74	0.74	0.00	0.17	0.17	—	761	761	0.01	0.03	2.87	773
Vendor	0.06	0.02	0.61	0.35	< 0.005	0.01	0.12	0.12	0.01	0.03	0.04	—	442	442	0.04	0.06	1.05	462
Hauling	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	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.31	0.28	0.26	2.94	0.00	0.00	0.74	0.74	0.00	0.17	0.17	—	710	710	0.02	0.03	0.07	720
Vendor	0.06	0.02	0.64	0.36	< 0.005	0.01	0.12	0.12	0.01	0.03	0.04	—	442	442	0.04	0.06	0.03	461
Hauling	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	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.09	0.08	0.07	0.85	0.00	0.00	0.22	0.22	0.00	0.05	0.05	—	215	215	0.01	0.01	0.37	218
Vendor	0.02	< 0.005	0.19	0.11	< 0.005	< 0.005	0.03	0.04	< 0.005	0.01	0.01	—	133	133	0.01	0.02	0.14	139
Hauling	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	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.02	0.02	0.01	0.16	0.00	0.00	0.04	0.04	0.00	0.01	0.01	—	35.6	35.6	< 0.005	< 0.005	0.06	36.1
Vendor	< 0.005	< 0.005	0.03	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	22.0	22.0	< 0.005	< 0.005	0.02	23.0
Hauling	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	0.00

3.12. Temporary Campus (2026) - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.35	0.33	2.82	14.8	0.02	0.07	—	0.07	0.07	—	0.07	—	2,397	2,397	0.10	0.02	—	2,405
Onsite truck	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	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.35	0.33	2.82	14.8	0.02	0.07	—	0.07	0.07	—	0.07	—	2,397	2,397	0.10	0.02	—	2,405
Onsite truck	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	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.11	0.10	0.85	4.47	0.01	0.02	—	0.02	0.02	—	0.02	—	722	722	0.03	0.01	—	725
Onsite truck	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	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.02	0.16	0.82	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	120	120	< 0.005	< 0.005	—	120
Onsite truck	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	0.00

Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.32	0.31	0.19	3.28	0.00	0.00	0.74	0.74	0.00	0.17	0.17	—	761	761	0.01	0.03	2.87	773
Vendor	0.06	0.02	0.61	0.35	< 0.005	0.01	0.12	0.12	0.01	0.03	0.04	—	442	442	0.04	0.06	1.05	462
Hauling	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	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.31	0.28	0.26	2.94	0.00	0.00	0.74	0.74	0.00	0.17	0.17	—	710	710	0.02	0.03	0.07	720
Vendor	0.06	0.02	0.64	0.36	< 0.005	0.01	0.12	0.12	0.01	0.03	0.04	—	442	442	0.04	0.06	0.03	461
Hauling	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	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.09	0.08	0.07	0.85	0.00	0.00	0.22	0.22	0.00	0.05	0.05	—	215	215	0.01	0.01	0.37	218
Vendor	0.02	< 0.005	0.19	0.11	< 0.005	< 0.005	0.03	0.04	< 0.005	0.01	0.01	—	133	133	0.01	0.02	0.14	139
Hauling	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	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.02	0.02	0.01	0.16	0.00	0.00	0.04	0.04	0.00	0.01	0.01	—	35.6	35.6	< 0.005	< 0.005	0.06	36.1
Vendor	< 0.005	< 0.005	0.03	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	22.0	22.0	< 0.005	< 0.005	0.02	23.0
Hauling	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	0.00

3.13. Parking Lot (2028) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road	0.82	0.69	6.63	9.91	0.01	0.26	—	0.26	0.24	—	0.24	—	1,511	1,511	0.06	0.01	—	1,516
Paving	0.13	0.13	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	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	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.05	0.04	0.40	0.60	< 0.005	0.02	—	0.02	0.01	—	0.01	—	91.1	91.1	< 0.005	< 0.005	—	91.4
Paving	0.01	0.01	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	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	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.07	0.11	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	15.1	15.1	< 0.005	< 0.005	—	15.1
Paving	< 0.005	< 0.005	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	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	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.10	0.09	0.06	0.96	0.00	0.00	0.25	0.25	0.00	0.06	0.06	—	245	245	< 0.005	< 0.005	0.78	246
Vendor	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	0.00
Hauling	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	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	< 0.005	0.05	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	13.8	13.8	< 0.005	< 0.005	0.02	14.0
Vendor	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	0.00
Hauling	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	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	2.29	2.29	< 0.005	< 0.005	< 0.005	2.32
Vendor	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	0.00
Hauling	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	0.00

3.14. Parking Lot (2028) - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.16	0.16	1.93	10.6	0.01	0.03	—	0.03	0.03	—	0.03	—	1,511	1,511	0.06	0.01	—	1,516
Paving	0.13	0.13	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	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	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.12	0.64	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	91.1	91.1	< 0.005	< 0.005	—	91.4

Paving	0.01	0.01	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	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	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.02	0.12	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	15.1	15.1	< 0.005	< 0.005	—	15.1
Paving	< 0.005	< 0.005	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	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	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.10	0.09	0.06	0.96	0.00	0.00	0.25	0.25	0.00	0.06	0.06	—	245	245	< 0.005	< 0.005	0.78	246
Vendor	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	0.00
Hauling	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	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	< 0.005	0.05	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	13.8	13.8	< 0.005	< 0.005	0.02	14.0
Vendor	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	0.00
Hauling	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	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	2.29	2.29	< 0.005	< 0.005	< 0.005	2.32
Vendor	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	0.00
Hauling	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	0.00

3.15. Coating (2028) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.13	0.11	0.81	1.12	< 0.005	0.02	—	0.02	0.01	—	0.01	—	134	134	0.01	< 0.005	—	134
Architectural Coatings	4.53	4.53	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	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	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.05	0.07	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	8.05	8.05	< 0.005	< 0.005	—	8.08
Architectural Coatings	0.27	0.27	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	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	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1.33	1.33	< 0.005	< 0.005	—	1.34

Architectural	0.05	0.05	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	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	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.02	0.01	0.01	0.16	0.00	0.00	0.04	0.04	0.00	0.01	0.01	—	40.8	40.8	< 0.005	< 0.005	0.13	41.0
Vendor	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	0.00
Hauling	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	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	2.30	2.30	< 0.005	< 0.005	< 0.005	2.34
Vendor	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	0.00
Hauling	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	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.38	0.38	< 0.005	< 0.005	< 0.005	0.39
Vendor	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	0.00
Hauling	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	0.00

3.16. Coating (2028) - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Roa Equipment	0.02	0.02	0.65	0.96	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	134	134	0.01	< 0.005	—	134
Architectural Coatings	2.33	2.33	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	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	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.04	0.06	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	8.05	8.05	< 0.005	< 0.005	—	8.08
Architectural Coatings	0.14	0.14	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	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	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1.33	1.33	< 0.005	< 0.005	—	1.34
Architectural Coatings	0.03	0.03	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	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	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.02	0.01	0.01	0.16	0.00	0.00	0.04	0.04	0.00	0.01	0.01	—	40.8	40.8	< 0.005	< 0.005	0.13	41.0
Vendor	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	0.00
Hauling	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	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	2.30	2.30	< 0.005	< 0.005	< 0.005	2.34
Vendor	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	0.00
Hauling	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	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.38	0.38	< 0.005	< 0.005	< 0.005	0.39
Vendor	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	0.00
Hauling	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	0.00

4. Operations Emissions Details

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Vegetation	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Species	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.4. Soil Carbon Accumulation By Vegetation Type - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Vegetation	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.5. Above and Belowground Carbon Accumulation by Land Use Type - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.6. Avoided and Sequestered Emissions by Species - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Species	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

5. Activity Data

5.1. Construction Schedule

Phase Name	Phase Type	Start Date	End Date	Days Per Week	Work Days per Phase	Phase Description
Removal of Temporary Campus	Demolition	7/1/2028	10/31/2028	5.00	87.0	4
Grading	Grading	1/1/2027	1/29/2027	5.00	21.0	2
Interim Grading	Grading	6/15/2026	7/14/2026	5.00	22.0	1A
Renovation	Building Construction	1/1/2027	6/30/2028	5.00	391	3A
Temporary Campus	Building Construction	7/15/2026	12/15/2026	5.00	110	1B
Parking Lot	Paving	6/1/2028	6/30/2028	5.00	22.0	3B
Coating	Architectural Coating	6/1/2028	6/30/2028	5.00	22.0	3C

5.2. Off-Road Equipment

5.2.1. Unmitigated

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
Removal of Temporary Campus	Concrete/Industrial Saws	Diesel	Average	1.00	8.00	33.0	0.73
Removal of Temporary Campus	Excavators	Diesel	Average	3.00	8.00	36.0	0.38
Removal of Temporary Campus	Rubber Tired Dozers	Diesel	Average	2.00	8.00	367	0.40
Grading	Excavators	Diesel	Average	1.00	8.00	36.0	0.38
Grading	Graders	Diesel	Average	1.00	8.00	148	0.41
Grading	Rubber Tired Dozers	Diesel	Average	1.00	8.00	367	0.40

Grading	Tractors/Loaders/Back	Diesel	Average	3.00	8.00	84.0	0.37
Interim Grading	Excavators	Diesel	Average	1.00	8.00	36.0	0.38
Interim Grading	Graders	Diesel	Average	1.00	8.00	148	0.41
Interim Grading	Rubber Tired Dozers	Diesel	Average	1.00	8.00	367	0.40
Interim Grading	Tractors/Loaders/Back hoes	Diesel	Average	3.00	8.00	84.0	0.37
Renovation	Forklifts	Diesel	Average	3.00	8.00	82.0	0.20
Renovation	Generator Sets	Diesel	Average	1.00	8.00	14.0	0.74
Renovation	Tractors/Loaders/Back hoes	Diesel	Average	3.00	7.00	84.0	0.37
Renovation	Welders	Diesel	Average	1.00	8.00	46.0	0.45
Temporary Campus	Cranes	Diesel	Average	1.00	7.00	367	0.29
Temporary Campus	Forklifts	Diesel	Average	3.00	8.00	82.0	0.20
Temporary Campus	Generator Sets	Diesel	Average	1.00	8.00	14.0	0.74
Temporary Campus	Tractors/Loaders/Back hoes	Diesel	Average	3.00	7.00	84.0	0.37
Temporary Campus	Welders	Diesel	Average	1.00	8.00	46.0	0.45
Parking Lot	Pavers	Diesel	Average	2.00	8.00	81.0	0.42
Parking Lot	Paving Equipment	Diesel	Average	2.00	8.00	89.0	0.36
Parking Lot	Rollers	Diesel	Average	2.00	8.00	36.0	0.38
Coating	Air Compressors	Diesel	Average	1.00	6.00	37.0	0.48

5.2.2. Mitigated

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
Removal of Temporary Campus	Concrete/Industrial Saws	Diesel	Tier 4 Final	1.00	8.00	33.0	0.73
Removal of Temporary Campus	Excavators	Diesel	Tier 4 Final	3.00	8.00	36.0	0.38
Removal of Temporary Campus	Rubber Tired Dozers	Diesel	Tier 4 Final	2.00	8.00	367	0.40

Grading	Excavators	Diesel	Tier 4 Final	1.00	8.00	36.0	0.38
Grading	Graders	Diesel	Tier 4 Final	1.00	8.00	148	0.41
Grading	Rubber Tired Dozers	Diesel	Tier 4 Final	1.00	8.00	367	0.40
Grading	Tractors/Loaders/Backhoes	Diesel	Tier 4 Final	3.00	8.00	84.0	0.37
Interim Grading	Excavators	Diesel	Tier 4 Final	1.00	8.00	36.0	0.38
Interim Grading	Graders	Diesel	Tier 4 Final	1.00	8.00	148	0.41
Interim Grading	Rubber Tired Dozers	Diesel	Tier 4 Final	1.00	8.00	367	0.40
Interim Grading	Tractors/Loaders/Backhoes	Diesel	Tier 4 Final	3.00	8.00	84.0	0.37
Renovation	Forklifts	Diesel	Tier 4 Final	3.00	8.00	82.0	0.20
Renovation	Generator Sets	Diesel	Average	1.00	8.00	14.0	0.74
Renovation	Tractors/Loaders/Backhoes	Diesel	Tier 4 Final	3.00	7.00	84.0	0.37
Renovation	Welders	Diesel	Tier 4 Final	1.00	8.00	46.0	0.45
Temporary Campus	Cranes	Diesel	Tier 4 Final	1.00	7.00	367	0.29
Temporary Campus	Forklifts	Diesel	Tier 4 Final	3.00	8.00	82.0	0.20
Temporary Campus	Generator Sets	Diesel	Average	1.00	8.00	14.0	0.74
Temporary Campus	Tractors/Loaders/Backhoes	Diesel	Tier 4 Final	3.00	7.00	84.0	0.37
Temporary Campus	Welders	Diesel	Tier 4 Final	1.00	8.00	46.0	0.45
Parking Lot	Pavers	Diesel	Tier 4 Final	2.00	8.00	81.0	0.42
Parking Lot	Paving Equipment	Diesel	Tier 4 Final	2.00	8.00	89.0	0.36
Parking Lot	Rollers	Diesel	Tier 4 Final	2.00	8.00	36.0	0.38
Coating	Air Compressors	Diesel	Tier 4 Final	1.00	6.00	37.0	0.48

5.3. Construction Vehicles

5.3.1. Unmitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix

Renovation	—	—	—	—
Renovation	Worker	45.0	11.7	LDA,LDT1,LDT2
Renovation	Vendor	16.0	8.40	HHDT,MHDT
Renovation	Hauling	0.00	20.0	HHDT
Renovation	Onsite truck	0.00	—	HHDT
Removal of Temporary Campus	—	—	—	—
Removal of Temporary Campus	Worker	30.0	11.7	LDA,LDT1,LDT2
Removal of Temporary Campus	Vendor	0.00	8.40	HHDT,MHDT
Removal of Temporary Campus	Hauling	10.0	20.0	HHDT
Removal of Temporary Campus	Onsite truck	0.00	—	HHDT
Temporary Campus	—	—	—	—
Temporary Campus	Worker	90.0	11.7	LDA,LDT1,LDT2
Temporary Campus	Vendor	16.0	8.40	HHDT,MHDT
Temporary Campus	Hauling	0.00	20.0	HHDT
Temporary Campus	Onsite truck	0.00	—	HHDT
Grading	—	—	—	—
Grading	Worker	15.0	11.7	LDA,LDT1,LDT2
Grading	Vendor	0.00	8.40	HHDT,MHDT
Grading	Hauling	125	20.0	HHDT
Grading	Onsite truck	0.00	—	HHDT
Interim Grading	—	—	—	—
Interim Grading	Worker	15.0	11.7	LDA,LDT1,LDT2
Interim Grading	Vendor	0.00	8.40	HHDT,MHDT
Interim Grading	Hauling	28.5	20.0	HHDT
Interim Grading	Onsite truck	0.00	—	HHDT
Parking Lot	—	—	—	—
Parking Lot	Worker	30.0	11.7	LDA,LDT1,LDT2
Parking Lot	Vendor	0.00	8.40	HHDT,MHDT

Parking Lot	Hauling	0.00	20.0	HHDT
Parking Lot	Onsite truck	0.00	0.00	HHDT
Coating	—	—	—	—
Coating	Worker	5.00	11.7	LDA,LDT1,LDT2
Coating	Vendor	0.00	8.40	HHDT,MHDT
Coating	Hauling	0.00	20.0	HHDT
Coating	Onsite truck	0.00	—	HHDT

5.3.2. Mitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Renovation	—	—	—	—
Renovation	Worker	45.0	11.7	LDA,LDT1,LDT2
Renovation	Vendor	16.0	8.40	HHDT,MHDT
Renovation	Hauling	0.00	20.0	HHDT
Renovation	Onsite truck	0.00	—	HHDT
Removal of Temporary Campus	—	—	—	—
Removal of Temporary Campus	Worker	30.0	11.7	LDA,LDT1,LDT2
Removal of Temporary Campus	Vendor	0.00	8.40	HHDT,MHDT
Removal of Temporary Campus	Hauling	10.0	20.0	HHDT
Removal of Temporary Campus	Onsite truck	0.00	—	HHDT
Temporary Campus	—	—	—	—
Temporary Campus	Worker	90.0	11.7	LDA,LDT1,LDT2
Temporary Campus	Vendor	16.0	8.40	HHDT,MHDT
Temporary Campus	Hauling	0.00	20.0	HHDT
Temporary Campus	Onsite truck	0.00	—	HHDT
Grading	—	—	—	—
Grading	Worker	15.0	11.7	LDA,LDT1,LDT2
Grading	Vendor	0.00	8.40	HHDT,MHDT

Grading	Hauling	125	20.0	HHDT
Grading	Onsite truck	0.00	—	HHDT
Interim Grading	—	—	—	—
Interim Grading	Worker	15.0	11.7	LDA,LDT1,LDT2
Interim Grading	Vendor	0.00	8.40	HHDT,MHDT
Interim Grading	Hauling	28.5	20.0	HHDT
Interim Grading	Onsite truck	0.00	—	HHDT
Parking Lot	—	—	—	—
Parking Lot	Worker	30.0	11.7	LDA,LDT1,LDT2
Parking Lot	Vendor	0.00	8.40	HHDT,MHDT
Parking Lot	Hauling	0.00	20.0	HHDT
Parking Lot	Onsite truck	0.00	0.00	HHDT
Coating	—	—	—	—
Coating	Worker	5.00	11.7	LDA,LDT1,LDT2
Coating	Vendor	0.00	8.40	HHDT,MHDT
Coating	Hauling	0.00	20.0	HHDT
Coating	Onsite truck	0.00	—	HHDT

5.4. Vehicles

5.4.1. Construction Vehicle Control Strategies

Non-applicable. No control strategies activated by user.

5.5. Architectural Coatings

Phase Name	Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
Coating	0.00	0.00	12,500	4,150	2,752

5.6. Dust Mitigation

5.6.1. Construction Earthmoving Activities

Phase Name	Material Imported (Cubic Yards)	Material Exported (Cubic Yards)	Acres Graded (acres)	Material Demolished (Building Square Footage)	Acres Paved (acres)
Removal of Temporary Campus	0.00	0.00	0.00	44,160	—
Grading	6,000	15,000	2.40	0.00	—
Interim Grading	3,500	14,300	1.38	0.00	—
Parking Lot	0.00	0.00	0.00	0.00	1.05

5.6.2. Construction Earthmoving Control Strategies

Non-applicable. No control strategies activated by user.

5.7. Construction Paving

Land Use	Area Paved (acres)	% Asphalt
Junior High School	0.00	0%
Parking Lot	1.05	100%

5.8. Construction Electricity Consumption and Emissions Factors

kWh per Year and Emission Factor (lb/MWh)

Year	kWh per Year	CO2	CH4	N2O
2026	0.00	204	0.03	< 0.005
2027	0.00	204	0.03	< 0.005
2028	0.00	204	0.03	< 0.005

5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres

5.18.1.2. Mitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres

5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

Biomass Cover Type	Initial Acres	Final Acres

5.18.1.2. Mitigated

Biomass Cover Type	Initial Acres	Final Acres

5.18.2. Sequestration

5.18.2.1. Unmitigated

Tree Type	Number	Electricity Saved (kWh/year)	Natural Gas Saved (btu/year)

5.18.2.2. Mitigated

Tree Type	Number	Electricity Saved (kWh/year)	Natural Gas Saved (btu/year)

6. Climate Risk Detailed Report

6.1. Climate Risk Summary

Cal-Adapt midcentury 2040–2059 average projections for four hazards are reported below for your project location. These are under Representation Concentration Pathway (RCP) 8.5 which assumes GHG emissions will continue to rise strongly through 2050 and then plateau around 2100.

Climate Hazard	Result for Project Location	Unit

Temperature and Extreme Heat	10.3	annual days of extreme heat
Extreme Precipitation	13.1	annual days with precipitation above 20 mm
Sea Level Rise	—	meters of inundation depth
Wildfire	6.15	annual hectares burned

Temperature and Extreme Heat data are for grid cell in which your project are located. The projection is based on the 98th historical percentile of daily maximum/minimum temperatures from observed historical data (32 climate model ensemble from Cal-Adapt, 2040–2059 average under RCP 8.5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.
Extreme Precipitation data are for the grid cell in which your project are located. The threshold of 20 mm is equivalent to about ¾ an inch of rain, which would be light to moderate rainfall if received over a full day or heavy rain if received over a period of 2 to 4 hours. Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.
Sea Level Rise data are for the grid cell in which your project are located. The projections are from Radke et al. (2017), as reported in Cal-Adapt (Radke et al., 2017, CEC-500-2017-008), and consider inundation location and depth for the San Francisco Bay, the Sacramento-San Joaquin River Delta and California coast resulting different increments of sea level rise coupled with extreme storm events. Users may select from four scenarios to view the range in potential inundation depth for the grid cell. The four scenarios are: No rise, 0.5 meter, 1.0 meter, 1.41 meters
Wildfire data are for the grid cell in which your project are located. The projections are from UC Davis, as reported in Cal-Adapt (2040–2059 average under RCP 8.5), and consider historical data of climate, vegetation, population density, and large (> 400 ha) fire history. Users may select from four model simulations to view the range in potential wildfire probabilities for the grid cell. The four simulations make different assumptions about expected rainfall and temperature are: Warmer/drier (HadGEM2-ES), Cooler/wetter (CNRM-CM5), Average conditions (CanESM2), Range of different rainfall and temperature possibilities (MIROC5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

6.2. Initial Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	N/A	N/A	N/A	N/A
Extreme Precipitation	4	0	0	N/A
Sea Level Rise	1	0	0	N/A
Wildfire	1	0	0	N/A
Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	0	0	0	N/A

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.
The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.
The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores do not include implementation of climate risk reduction measures.

6.3. Adjusted Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	N/A	N/A	N/A	N/A
Extreme Precipitation	4	1	1	4
Sea Level Rise	1	1	1	2
Wildfire	1	1	1	2
Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	1	1	1	2

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.
The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.
The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores include implementation of climate risk reduction measures.

7. Health and Equity Details

7.1. CalEnviroScreen 4.0 Scores

The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Exposure Indicators	—
AQ-Ozone	6.38
AQ-PM	26.7
AQ-DPM	55.3
Drinking Water	7.43
Lead Risk Housing	36.9
Pesticides	0.00
Toxic Releases	51.3
Traffic	78.1

Effect Indicators	—
CleanUp Sites	0.00
Groundwater	39.8
Haz Waste Facilities/Generators	20.3
Impaired Water Bodies	90.1
Solid Waste	52.9
Sensitive Population	—
Asthma	2.57
Cardio-vascular	4.00
Low Birth Weights	30.1
Socioeconomic Factor Indicators	—
Education	1.46
Housing	48.1
Linguistic	22.9
Poverty	17.7
Unemployment	22.6

7.2. Healthy Places Index Scores

The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Economic	—
Above Poverty	78.26254331
Employed	83.06172206
Median HI	79.08379315
Education	—
Bachelor's or higher	92.62158347
High school enrollment	100
Preschool enrollment	95.7141024

Transportation	—
Auto Access	18.40112922
Active commuting	88.09187733
Social	—
2-parent households	66.68805338
Voting	98.76812524
Neighborhood	—
Alcohol availability	42.88464006
Park access	81.35506224
Retail density	61.04196073
Supermarket access	68.51020146
Tree canopy	95.63711023
Housing	—
Homeownership	51.14846657
Housing habitability	33.65841139
Low-inc homeowner severe housing cost burden	27.16540485
Low-inc renter severe housing cost burden	19.78698832
Uncrowded housing	91.95431798
Health Outcomes	—
Insured adults	98.39599641
Arthritis	0.0
Asthma ER Admissions	91.8
High Blood Pressure	0.0
Cancer (excluding skin)	0.0
Asthma	0.0
Coronary Heart Disease	0.0
Chronic Obstructive Pulmonary Disease	0.0
Diagnosed Diabetes	0.0

Life Expectancy at Birth	72.5
Cognitively Disabled	84.2
Physically Disabled	27.7
Heart Attack ER Admissions	92.5
Mental Health Not Good	0.0
Chronic Kidney Disease	0.0
Obesity	0.0
Pedestrian Injuries	86.8
Physical Health Not Good	0.0
Stroke	0.0
Health Risk Behaviors	—
Binge Drinking	0.0
Current Smoker	0.0
No Leisure Time for Physical Activity	0.0
Climate Change Exposures	—
Wildfire Risk	0.0
SLR Inundation Area	20.1
Children	87.9
Elderly	4.8
English Speaking	80.8
Foreign-born	28.2
Outdoor Workers	92.7
Climate Change Adaptive Capacity	—
Impervious Surface Cover	72.2
Traffic Density	85.2
Traffic Access	69.4
Other Indices	—
Hardship	6.2

Other Decision Support	—
2016 Voting	99.4

7.3. Overall Health & Equity Scores

Metric	Result for Project Census Tract
CalEnviroScreen 4.0 Score for Project Location (a)	8.00
Healthy Places Index Score for Project Location (b)	94.0
Project Located in a Designated Disadvantaged Community (Senate Bill 535)	No
Project Located in a Low-Income Community (Assembly Bill 1550)	No
Project Located in a Community Air Protection Program Community (Assembly Bill 617)	No

a: The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.
b: The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

7.4. Health & Equity Measures

No Health & Equity Measures selected.

7.5. Evaluation Scorecard

Health & Equity Evaluation Scorecard not completed.

7.6. Health & Equity Custom Measures

No Health & Equity Custom Measures created.

8. User Changes to Default Data

Screen	Justification
Construction: Construction Phases	Data Responses September 16, 2025
Land Use	Data Responses September 16, 2025
Operations: Energy Use	Data Responses
Construction: Dust From Material Movement	Data Responses September 16, 2025
Operations: Solid Waste	Data Response
Operations: Vehicle Data	Traffic Study

Construction: Off-Road Equipment	Data Responses September 16, 2025
Construction: Trips and VMT	Data Responses September 16, 2025
Construction: Architectural Coatings	Data Responses September 16, 2025

Technical Memorandum

From: Luis Rosas, Noise Technical Associate, RCH Group, Daniel Jones, Senior Project Manager, RCH Group

CC: Paul Miller, Managing Principal, RCH Group

To: Richard Grassetti, Grassetti Environmental Consulting

Date: September 30, 2025

Subject: Mill Valley Middle School Renovation Alternative – Noise and Vibration Impacts

This memorandum describes the noise and vibration impacts, specifically construction-related noise and vibration impacts, due to the Renovation Alterative. The Renovation Alternative rehabilitates the existing Mill Valley Middle School (MVMS) – both the Main Building (92,000 square feet) and the Multi-Purpose/Gymnasium Building (15,200 square feet) – addressing exterior and interior finish materials as well as infrastructure improvements such as heating, ventilation and air conditioning, fire sprinklers and upgrades to electrical systems. The Renovation Alternative anticipates removal of all existing portable buildings except for the Band Room at the project completion. Site improvements include solar canopies, outdoor learning spaces and improvements for safety and security (perimeter fencing). In addition, a small building for STEM education is proposed, roughly 4,000 square feet, at the north end of the existing main building. The Renovation Alternative campus is expected to house a capacity of 1,100 students.

The noise and vibration analysis for the Renovation Alternative used the same noise modeling methodologies employed by the replacement campus project. The Renovation Alternative would employ the same mitigation measures directed for the replacement project.

Operational noise impacts for the Renovation Alternative would be the same as for the replacement project since the Renovation Alternative would not result in a change to student enrollment.

Construction Impacts

Construction of the Project would increase exterior and interior noise levels at the Interim Campus. (Significant and Unavoidable)

Construction noise levels would fluctuate throughout the day depending on the equipment use, construction schedules, and location of construction during extended periods of time and would result in a temporary increase in noise levels in the vicinity of the project. Construction would require noise-generating equipment (e.g., excavators, loaders, dozers, compactors, trucks, etc.). However, the use of heavy equipment (e.g., dozers and compactors) required for the construction of the Renovation Alternative as well as the duration of use would be much less compared to the use of heavy equipment required for construction of the replacement project due to the substantial reduction in grading and reduced construction period. The noise levels generated by construction equipment can vary greatly

depending upon factors such as the type and specific model of the equipment, the operation being performed, the condition of the equipment and the prevailing wind direction.

The MVMS itself is a noise-sensitive receptor. Other than MVMS, the nearest noise-sensitive receptors are residences along Camino Alto and Mt. Tamalpais United Methodist church. Construction activities could occur as close as approximately 250 feet from Mt. Tamalpais United Methodist Church, approximately 300 feet from the nearest residence on Camino Alto, and approximately 600 feet from The Redwoods (retired and assisted living complex). The noise levels for various types of construction equipment that could be used during construction at 50, 250, 300 and 600 feet are provided in **Table 1**. As shown in **Table 1**, the average noise levels from construction activities occurring at 50 feet would range from 70 to 81 dB, Leq.

TABLE 1. TYPICAL AVERAGE NOISE LEVELS FROM CONSTRUCTION EQUIPMENT

Construction Equipment	Noise Level (dB, Leq at 50 feet)	Noise Level (dB, Leq at 250 feet)	Noise Level (dB, Leq at 300 feet)	Noise Level (dB, Leq at 600 feet)
Dump Truck	73	59	57	51
Air Compressor	74	60	58	52
Backhoe	74	60	58	52
Dozer	78	64	62	56
Excavator	77	63	61	55
Flat Bed Truck	70	56	54	48
Forklift	73	59	57	51
Paver	74	60	58	52
Grader	81	67	65	59
Generator	78	64	62	56
Roller	73	59	57	51
Vibratory Concrete Mixer	73	59	57	51
Concrete Mixer Truck	75	61	59	53
Welder	70	56	54	48

NOTE: An attenuation rate of 6.0 per doubling distance was used to convert the FHWA noise levels at 50 feet to the noise levels at 250, 300, and 600 feet.

SOURCE: Federal Highway Administration (FHWA) Roadway Construction Noise Model, 2006.

A.1 Construction Noise Impacts to Interior Noise Levels at the Interim Campus

This analysis assumes that construction activities could occur as close as 50 feet away from the nearest interim campus building (portable building). Interior noise levels inside the portable classroom building widely varied depending on whether there were students entering the classroom during passing period, whether the teacher or students were talking/discussing or if there was quiet study time during instruction. Short-term, 1-minute Leq's ranged from 45-74 dB inside a portable classroom at the MVMS campus. Impacts from construction would be potentially significant if construction noise would result in

an increase of 3 dB, Leq (1-hour) or more over existing interior classroom noise levels at the interim campus. **Table 2** shows the predicted noise interior noise levels at the interim campus during construction.

TABLE 2. PREDICTED INTERIOR NOISE LEVELS AT INTERIM CAMPUS DURING CONSTRUCTION

Construction Reference Noise Level (dB, Leq at 50 feet)	Construction Reference Noise Level (dB, Leq at 50 feet) (Mitigated)	Existing Interior Noise Levels (dB, Leq)	Change from Existing Noise Levels (dB, Leq) (Unmitigated)	Change from Existing Noise Levels (dB, Leq) (Mitigated)	Noise Threshold (dB, Leq)	Exceeds Noise Threshold?
70-81	54-65[1]	45-74	0-15	0[1,2,3]	Increase of 3 or more	No

NOTES:

1. Assumes a 16 dB reduction from a 16-foot-tall construction noise barrier that would break the line of sight between the construction footprint and the nearest interim campus buildings (see **Mitigation Measure 3.9-2**).
2. Assuming construction equipment listed in **Table 1** would be in use as close as 50 feet away from the nearest interim campus building exterior area.
3. RCH observed a 21 dB exterior-to-interior noise reduction provided by the existing portable classroom buildings (with windows and doors closed). This reduction is applied to the resulting noise levels.

When windows and doors are closed at the interim campus, a 21 dB exterior-to-interior noise reduction can be expected at the portable classroom buildings[1]. As shown in **Table 2** above, construction noise levels for the Renovation Alternative would not increase the interior noise levels with implementation of **Mitigation Measures 3.9-1** through **3.9-4** and construction noise impacts of the Renovation Alternative on interior noise levels at the interim campus would be **less than significant with mitigation.**

A.2 Construction Noise Impacts to Exterior Noise Levels at the Interim Campus

Exterior noise levels at MVMS widely varied depending on whether there were students outside during passing period or lunch breaks or if classrooms were in session and there were no students outside. Short-term, 5-minute Leq's were 52 dB, Leq and 71 dB, Leq when taken at exterior areas at MVMS nearby the interim campus locations. Although exterior short-term measurements were taken at 5-minute intervals, it is assumed that the exterior hourly Leq would be similar to what was observed during short-term noise measurements during school instruction. Thus, a range of 52-71 dB, Leq (1-hour) is used for analyzing exterior noise impacts. Impacts from construction would be potentially significant if construction noise would result in an increase of a 5 dB, Leq (1-hour) or more over existing exterior noise levels at the interim campus. **Table 3** shows the predicted exterior noise levels at the interim campus during construction.

[1] RCH conducted an exterior-to-interior noise reduction test at a portable classroom building and determined a 21 dB reduction is afforded by the type of building materials at the portable classroom buildings, when windows and doors are closed.

TABLE 3. PREDICTED EXTERIOR NOISE LEVELS AT INTERIM CAMPUS DURING CONSTRUCTION

Construction Reference Noise Level (dB, Leq at 50 feet)	Construction Reference Noise Level (dB, Leq at 50 feet) (Mitigated)	Existing Exterior Noise Levels (dB, Leq)	Change from Existing Noise Levels (dB, Leq) (Unmitigated)	Change from Existing Noise Levels (dB, Leq) (Mitigated)	Noise Threshold (dB, Leq)	Exceeds Noise Threshold?
70-81	54-65[1]	52-71	1-29	0-13[1,2]	Increase of 5 or more	Yes

NOTES:

1. Assumes a 16 dB reduction from a 16-foot-tall construction noise barrier that would break the line of sight between the construction footprint and the nearest interim campus buildings (see **Mitigation Measure 3.9-2**).
2. Assuming construction equipment listed in **Table 1** would be in use as close as 50 feet away from the nearest interim campus building exterior area.

As shown in **Table 3** above, construction noise levels from the Renovation Alternative could significantly increase the exterior noise levels by up to 13 dB, Leq above the existing exterior ambient noise environment and would be a significant impact of the Renovation Alternative. Because existing exterior noise levels widely varied depending on whether students were inside of classrooms or on recess/lunch break, the construction noise effects would also widely vary depending on the activities occurring during school session. In addition, this analysis assumes that construction of the Renovation Alternative would occur when students are present at the interim campus. When classroom instruction occurs and there are no students outdoors, then louder construction activities would result in a much more noticeable increase in exterior noise levels compared to when students are outdoors. **Mitigation Measures 3.9-1, 3.9-2, and 3.9-4** would greatly reduce construction noise levels reaching the interim campus. However, even with the implementation of these measures, construction noise levels reaching the interim campus would exceed the exterior noise threshold of 5 dB, Leq (1-hour) threshold (a readily perceptible increase) and this increase in noise would likely disrupt outdoor activities and result in annoyance to on-site students, teachers, and staff. This would be a **Significant and Unavoidable** impact of the Renovation Alternative. Note that under the Renovation Alternative, construction activities would last 2 years instead of 3 years compared to the replacement project, thus, the noise exposure to significant noise impacts from construction activities would be less.

A.3 Construction noise impacts at off-site noise-sensitive receptors

As shown in **Table 1**, construction occurring closest to noise-sensitive receptors would range from 56-67 dB, Leq. Existing traffic noise levels reaching the residential areas adjacent to Camino Alto are 67-69 dB, Leq. Since the majority of construction activities would occur at distances much greater than 250-300 feet away from the nearby residences and the church, it is very likely that most construction noise would be masked by existing traffic noise and would not result in a perceptible change in noise levels at nearby noise-sensitive receptors. Furthermore, Project construction would only occur within the adopted construction hours in the Mill Valley Municipal Code (between 7 a.m. to 6 p.m. on weekdays [no power tools or heavy equipment until 8 a.m.]). This impact would be **less than significant.**

A.4 Construction noise impacts at Friends Field

The overall construction footprint would be at least 280 feet southwest of Friends Field South and at least 700 feet southwest of Friends Field North. Friends Field would be used by students for recess breaks. Due to the distance between the construction footprint and Friends Field, it is very likely that most construction noise would be masked by the noise students would make during recess breaks at Friends Field. If any construction noise is perceptible to students/staff at Friends Field during recess it would not be expected interrupt outdoor activities during recess since classroom instruction would not be occurring at Friends Field, only recess breaks. This impact would be **less than significant.**

Construction of the Project could generate substantial groundborne vibration levels at nearby buildings. (Less than Significant)

A.5 Construction vibration impacts at the Interim Campus

At the highest levels of vibration, damage to structures is primarily architectural (e.g., loosening and cracking of plaster or stucco coatings) and rarely results in structural damage. For vibration, a PPV threshold of 0.5 inch per second or greater can cause architectural damage and minor structural damage. The Federal Transit Administration recommends a threshold of 0.5 PPV for residential and commercial structures. This analysis conservatively assumes that all proposed equipment for the Renovation Alternative could operate as close as 50 feet from the interim campus. As discussed above, construction activities could occur as close as approximately 300 feet from the nearest residence and approximately 250 feet from Mt. Tamalpais United Methodist Church. However, the majority of construction activities would occur at distances far greater than 250 feet away from off-site noise-sensitive receptors. The estimated PPV for proposed heavy equipment that could be used at 50 and 250 feet is summarized in **Table 4.**

TABLE 4. REPRESENTATIVE VIBRATION SOURCE LEVELS AT 50 AND 250 FEET

Construction Equipment		PPV at 50 feet (in/sec)	Exceeds 0.5 in/sec PPV Threshold?	PPV at 250 feet (in/sec)	Exceeds 0.5 in/sec PPV Threshold?
Bulldozer	Large	0.03	No	0.003	No
	Small	0.001	No	0.0001	No
Vibratory Roller		0.07	No	0.01	No
Loaded Trucks		0.03	No	0.002	No
Excavator[1]		0.06	No	0.006	No
Backhoe[1]		0.01	No	0.001	No
Loader[1]		0.01	No	0.001	No

NOTE:

1 Construction Equipment PPV reference from NHDOT, *Ground Vibrations Emanating from Construction Equipment* (FHWA-NH-RD-12323W), 2012.

SOURCE: Federal Transit Administration, 2006.

As shown in **Table 4**, the predicted vibration levels from proposed heavy equipment used for construction of the Renovation Alternative would be well below the FTA recommended threshold of 0.5 PPV at 50 and 250 feet away. This impact would be **less than significant.**

Conclusions

The Renovation Alternative would not involve major demolition of the existing main school building and the grading would be reduced compared to the replacement project. Thus, the construction noise and vibration impacts for the renovation alterative would be slightly lower compared to the construction noise and vibration impacts that were analyzed for the replacement project. Furthermore, under the Renovation Alternative, construction activities would last 2 years instead of 3 years needed for the replacement project, thus, the noise exposure to significant noise impacts from construction activities would be less.

Under the Renovation Alternative, the interior noise impacts at the interim campus from construction would be reduced to a 0 dB increase (compared to a 1 dB increase in interior noise with the replacement project). This impact would remain less than significant.

Under the Renovation Alternative, the exterior noise impacts at the interim campus from construction would be reduced to a 13 dB increase (compared to a 15 dB increase in exterior noise with the replacement project). However, the exterior noise impacts at the interim campus would remain a significant and unavoidable impact because construction noise of the Renovation Alternative would still exceed the exterior noise threshold of 5 dB, Leq (1-hour) threshold (a readily perceptible increase).

The construction noise and vibration impacts for the Renovation Alternative at other receptors (nearby residences, Mt. Tamalpais United Methodist Church, Friends Field, etc.) would be slightly lower compared to the replacement project and would remain less than significant.

Operational traffic noise impacts for the Renovation Alternative would be the same as for the replacement project since the Renovation Alternative would not result in a change to student enrollment. Thus, traffic noise would remain less than significant.

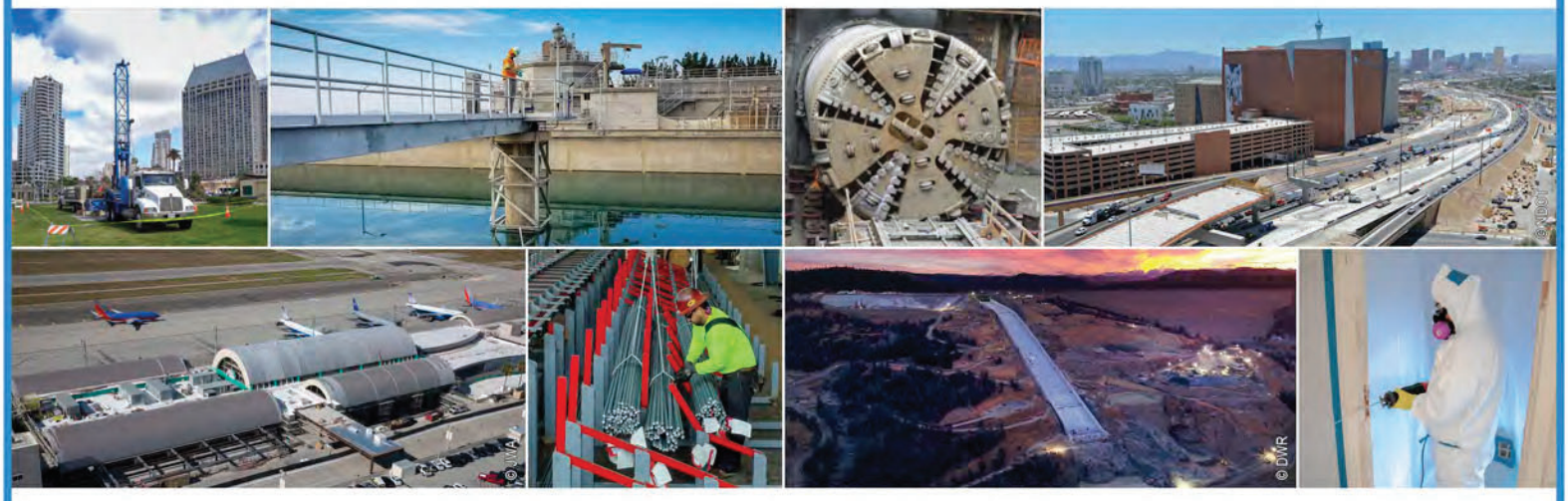
APPENDIX D. UPDATED HUMAN HEALTH RISK ASSESSMENT (HHRA) FOR PROPOSED PROJECT

Human Health Risk Assessment

Mill Valley Middle School
425 Sycamore Avenue
Mill Valley, California

Mill Valley School District
411 Sycamore Avenue | Mill Valley, California 94941

November 17, 2025 | Project No. 404704001



Geotechnical | Environmental | Construction Inspection & Testing | Forensic Engineering & Expert Witness

Geophysics | Engineering Geology | Laboratory Testing | Industrial Hygiene | Occupational Safety | Air Quality | GIS

Ninyo & Moore
Geotechnical & Environmental Sciences Consultants

Ninyo & Moore
A SOCOTEC COMPANY

Human Health Risk Assessment
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November 17, 2025 | Project No. 404704001

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CONTENTS

1	INTRODUCTION	1
2	COPC SELECTION	2
2.1	Organic Compounds	3
2.2	Metals	3
2.2.1	Arsenic in Soil	3
2.2.2	Lead in Soil	4
3	EXPOSURE ASSESSMENT	4
3.1	Potential Receptors	4
3.2	Soil and Dust Exposure Point Concentrations	6
3.3	Vapor Inhalation of Chemicals in Indoor Air	6
4	TOXICITY ASSESSMENT	8
4.1	Non-Carcinogenic Dose-Response Criteria	8
4.2	Carcinogenic Dose-Response Criteria	9
5	RISK CHARACTERIZATION	10
5.1	Average Daily Dose / Lifetime Daily Dose	10
5.2	Soil Exposure Non-Carcinogenic Health Hazards	12
5.3	Soil Exposure Cancer Risk Estimates	13
5.4	Vapor Intrusion Non-Carcinogenic Health Hazard	15
5.5	Vapor Intrusion Cancer Risk Characterization	16
6	CONCLUSIONS AND RECOMMENDATIONS	17
7	REFERENCES	20

TABLES

1 – Exposure Parameters for On-Site Receptors – School Exposure Scenario

2 – Exposure Parameters for On-Site Receptors – Hypothetical Residential Exposure Scenario

3 – Indoor Air Exposure Point Concentrations Estimated for Hypothetical Residential and Current School Exposure Scenarios

4 – Toxicity Criteria for Chemicals of Potential Concern in Soil

5 – Toxicity Criteria for Chemicals of Potential Concern in Soil Vapor

6 – Estimated Cumulative Risks and Hazards, Multi-Pathway Soil Exposure – School Exposure Scenario

7 – Estimated Cumulative Risks and Hazards, Multi-Pathway Soil Exposure - Hypothetical Residential Exposure Scenario

8 – Health Hazards from Inhalation of Indoor Air - School Staff Exposure Scenario

9 – Health Hazards from Inhalation of Indoor Air - School Student Exposure Scenario

10 – Health Hazards from Inhalation of Indoor Air - Hypothetical Residential Exposure Scenario

11 – Cancer Risks from Inhalation of Indoor Air - School Staff Exposure Scenario

12 – Cancer Risks from Inhalation of Indoor Air - School Student Exposure Scenario

13 – Cancer Risks from Inhalation of Indoor Air - Hypothetical Residential Exposure Scenario

APPENDICES

A – Health Hazards and Cancer Risk Supporting Calculations - School Exposure Scenario

B – Health Hazards and Cancer Risk Supporting Calculations - Hypothetical Residential Exposure Scenario

1 INTRODUCTION

This Human Health Risk Assessment (HHRA) was prepared to evaluate the potential health risk that may result from theoretical exposure to contaminants at the Mill Valley Middle School property located at 425 Sycamore Avenue, Mill Valley, California (Site). The HHRA uses conservative assumptions to evaluate the properties of the contaminants of potential concern (COPCs) and the pathways by which people may potentially be exposed. The objective of the HHRA was to determine whether concentrations of COPCs in soil and soil vapor represent a threat to current and future on-Site receptors.

The HHRA was performed in conformance with the following guidance from the United States Environmental Protection Agency (EPA) and the California Department of Toxic Substances Control (DTSC):

- DTSC, 2009. Arsenic Strategies: Determination of Arsenic Remediation Development of Arsenic Cleanup Goals. January 16 (DTSC Arsenic Strategies Guidance).
- DTSC, 2011. Final Guidance for the Evaluation and Mitigation of Subsurface Vapor Intrusion to Indoor Air.
- DTSC, 2015. Preliminary Endangerment Assessment (PEA) Guidance Manual.
- DTSC, 2022a. HHRA Note Number 4, Guidance for Screening Level Human Health Risk Assessments.
- DTSC, 2022b. HHRA Note Number 11, Southern California Ambient Arsenic Screening Level.
- DTSC, 2023. Supplemental Guidance: Screening and Evaluating Vapor Intrusion.
- DTSC, 2025a. HHRA Note Number 1, Recommended DTSC Default Exposure Factors for Use in Risk Assessment at California Hazardous Waste Sites and Permitted Facilities.
- DTSC, 2025b. HHRA Note Number 3, DTSC-Modified Screening Levels.
- DTSC, 2025c. HHRA Note Number 10, Toxicity Criteria.
- EPA, 1989. Risk Assessment Guidance for Superfund: Volume I - Human Health Evaluation Manual.
- EPA, 2024. Regional Screening Levels.

As required by the EPA and DTSC, this HHRA quantitatively evaluates the potential health impacts associated with human exposure to chemicals detected in soil and soil vapor beneath the Site. This HHRA evaluates two exposure scenarios: 1) current school exposure, and 2) hypothetical residential exposure. Site characterization data were compiled into a database and statistically

analyzed to establish representative chemical concentrations. Then, where appropriate, environmental fate and transport models were used to estimate the concentrations of the chemicals to which human receptors might be exposed. The HHRA summary tables are included herein (Tables 1 through 13).

Conservative methods, models, and assumptions have been utilized during the preparation of this HHRA in accordance with the guidelines of the EPA and DTSC. For the future redevelopment scenario, the HHRA assumes residential use, which provides a more conservative risk evaluation than what would be required for the anticipated Site use. In addition, the HHRA incorporates, to the extent possible, recent improvements and refinements in the practice of risk assessment. Current regulatory guidance requires risk assessments to be health-protective in nature and will likely overestimate potential health risk at the Site for current and proposed Site use. Therefore, actual risks associated with conditions evaluated in this HHRA are likely to be lower than those described herein. Conservative assumptions built into the HHRA include:

- Evaluation of hypothetical future residential scenario; which assumes residents are present 24 hours per day, 350 days per year for 20 years for an adult and 6 years for a child (26 years in total); even though current and proposed uses are for a school;
- Calculations use maximum COPC concentrations instead of Site averages;
- Calculations assume direct exposure to COPCs without mitigation measures;
- Calculations assume COPC concentrations are constant and continuously released and ignore some fate and transport mechanisms and natural degradation; and
- The default (conservative) attenuation factor (AF) of 0.3 was used to perform vapor intrusion risk calculations.

2 COPC SELECTION

In an effort to be conservative, all chemicals detected at the Site in at least one sample are considered to be COPCs, regardless of whether the concentration exceeded a residential screening level. This results in an overly conservative HHRA evaluation by considering and incorporating constituent concentrations that would be considered safe under a residential exposure scenario. As described in current EPA and DTSC risk assessment guidance, including each chemical identified in at least one sample as a COPC ensures that all chemicals were quantitatively evaluated in the HHRA.

2.1 Organic Compounds

Organic chemicals detected at the Site in at least one sample include organochlorinated pesticides (OCPs), polychlorinated biphenyls (PCBs), dioxins, polycyclic aromatic hydrocarbons (PAHs), and total petroleum hydrocarbons (TPHs) in soil and volatile organic compounds (VOCs) including TPHs in soil vapor. VOCs detected included aromatic hydrocarbons and chlorinated hydrocarbons. Organic compounds detected in soil and/or soil vapor at concentrations above laboratory reporting limits at least once were considered to be COPCs for the Site.

The VOCs detected in soil vapor at the Site include TPHs, chlorinated hydrocarbons, and chloroform.

2.2 Metals

All Title 22 Metals were detected above laboratory reporting limits in at least one soil sample and therefore were included in the risk evaluation for this HHRA.

In accordance with DTSC Arsenic Strategies Guidance (DTSC, 2009) and DTSC HERO HHRA Note Number 4 (DTSC, 2022a), potential health risk and hazard posed by arsenic and lead concentrations in soil were evaluated independently as described below.

2.2.1 Arsenic in Soil

The DTSC Arsenic Strategies Guidance (DTSC, 2009) states that for arsenic, cleanup levels should be set at the background concentration. The background concentration is used to determine if there are any arsenic impacts and to determine if potential risk associated with arsenic is present.

The Site-specific soil arsenic background concentration has been determined to be 15 milligrams per kilogram (mg/kg). This Site-specific background concentration is generally consistent with DTSC-conducted studies of California soils.[1,2] Arsenic was detected above the Site-specific background level in 27 soil samples at concentrations ranging from 15 mg/kg to 230 mg/kg at depths ranging from 0.5 feet below ground surface (bgs) to 15 feet bgs. Since

[1] DTSC Human and Ecological Risk Office (HERO), 2022. Human Health Risk Assessment Note Number 11, Southern California Ambient Arsenic Screening Level. December 28.

[2] DTSC, 2009. Arsenic Strategies, Determination of Arsenic Remediation Development of Arsenic Cleanup Goals. January 16.

some arsenic concentrations exceed the Site-specific background concentration, there may be potential risk associated with arsenic in Site soil if mitigation measures are not in place. The ground surface above shallow soil samples with arsenic exceedances consists of the landfill cover or cap (e.g., under landscaping or under a paved area), which mitigates potential direct exposure to elevated arsenic concentrations in shallow soil (0.5 to 1 foot bgs). There were no arsenic detections exceeding the Site-specific background level in surface samples and the calculated 95% upper confidence limit (95UCL) of arsenic within surface and shallow soil (0.5 to 1 foot bgs) is 10 mg/kg, which is also below the Site-specific background level.

2.2.2 Lead in Soil

DTSC's HERO HHRA Note Number 4 (DTSC, 2022a) indicates that, for lead, concentrations should be compared to the residential DTSC SL of 80 mg/kg to evaluate if potential risk associated with lead is present. Lead was detected above the DTSC SL of 80 mg/kg in 38 soil samples at concentrations ranging from 92 mg/kg to 23,000 mg/kg at depths ranging from the ground surface to 15 feet bgs. Since some samples exceed the soil screening level for lead, there may be potential risk associated with lead in Site soil if not mitigated. The ground surface above buried waste and the samples with the highest lead concentrations consists of the landfill cover or cap (e.g., under landscaping or under a paved area) which prevents contact with underlying soils. The calculated 95UCL of lead within surface and shallow soil (0.5 to 1 foot bgs) is 61 mg/kg, which is below the DTSC SL.

3 EXPOSURE ASSESSMENT

3.1 Potential Receptors

Given the current use of the Site and potential redevelopment, and in an effort to present the most conservative evaluation of risks, potential exposures to two sets of on-Site receptors are evaluated: (1) school staff and students, and (2) hypothetical future residential receptors, as described below. The exposure assessment is based on a theoretical scenario where no protective systems, remedial action, or mitigation is in place.

School Exposure (Staff and Students): School receptors were deemed to have the potential to come in contact with chemicals that might be present in soil from 0 to 1 foot bgs, in landscape areas through the inhalation of ambient air and direct contact with soil. Ambient air may become impacted by airborne dust; therefore, the inhalation of dust is considered to be a complete exposure pathway. The incidental ingestion of and dermal contact with impacted soil is considered to be a complete exposure pathway. This scenario assumed students are exposed to COPCs

through the exposure pathways for 6 hours per day, 180 days per year, for 3 years, and staff are exposed for 8 hours per day, 250 days per year, for 25 years. Exposure parameters for on-Site receptors for the current Site use are presented on Table 1.

Hypothetical Residential Receptors: A residential scenario was evaluated because it provides the most conservative assessment in regards to the potential receptors and exposure timeframe. Under this scenario, future on-Site residents could include adult and child residents. The hypothetical adult and child residential receptors were deemed to have the potential to come in contact with COPCs that might be present in soil (regardless of depth) through the inhalation of ambient air and direct contact with soil. Ambient air may become impacted by airborne dust; therefore, the inhalation of dust is considered to be a complete exposure pathway. Residents could also come in contact with soils through backyard activities such as gardening and other recreational activities. Therefore, the incidental ingestion of and dermal contact with impacted soil is considered to be a complete exposure pathway. This scenario assumed a person is exposed to COPCs for 24 hours per day, 350 days per year for the first 6 years of their life and 24 hours per day, 350 days per year for 26 years in total (with 6 years as a child, and 20 years as an adult). Exposure parameters for hypothetical on-Site receptors for Site residential use are presented on Table 2.

This HHRA assumed that a potential source of VOCs exists under the Site. It was also assumed that this potential VOC source would be infinite and in steady-state condition (i.e., not depleting) for the next 26 years even though the concentrations would likely deplete over time. The assumption that VOC vapors will migrate up to the surface and enter a building through cracks in its foundation is a conservative assumption and will result in an over-estimate of health risk. Furthermore, redevelopment of the Site will include construction of protective systems, such as sub-slab depressurization systems, which are not considered or evaluated in the HHRA. Regardless, this vapor intrusion pathway is considered a potential exposure pathway for both the school receptors and the hypothetical residential receptors.

The HHRA assumes that future on-Site receptors will continue to receive their drinking water from municipal sources and will not depend on groundwater wells for their water needs. Due to the Site's proximity to the Pickleweed Inlet and the likelihood that groundwater is tidally influenced, groundwater is likely brackish and unsuitable as a water supply. Ryan Creek is fenced off and locked from current Site receptors to mitigate potential direct contact with surface water in compliance with LEA requirements. Therefore, the surface water and groundwater exposure pathways are not considered to be complete exposure pathways for current or future on-Site receptors and were not considered in this HHRA.

Although off-Site residential populations located within a one-mile radius of the Site may also be potentially exposed to COPCs identified at the Site, their exposures should be substantially less than those estimated for on-Site residential receptors because of wind dispersion and dilution. Therefore, only exposure to hypothetical on-Site residents is quantitatively evaluated in this HHRA.

3.2 Soil and Dust Exposure Point Concentrations

Metals, OCPs, PCBs, PAHs, TPHs, and dioxins were detected in soil at the Site. Exposure to these chemicals may occur via inhalation of fugitive dust, incidental ingestion, and dermal contact. Inhalation exposure to non-volatile compounds is typically minor in fugitive dust when compared to direct ingestion exposure (EPA, 2002). Nevertheless, a relationship must be estimated between the chemical concentration in soil and the concentration in air due to fugitive dust emissions from surface soil.

The EPA (2002) and DTSC (2015) recommend using a particulate emission factor (PEF) to model COPC concentrations in airborne dust. The PEF represents an annual average emission rate based on wind erosion. The default PEF value for a residential exposure scenario published by the DTSC (2025a) was used in this HHRA for both the current Site use and residential exposure scenarios evaluated. The residential PEF value of 1.36E+09 cubic meters per kilogram (m^3/kg) was used to estimate dust emissions for the Site. The COPC concentration in ambient air due to dust emissions was obtained by dividing the soil COPC concentrations by the PEF. The estimated ambient air exposure point concentrations were used to estimate dust inhalation exposures for all potential receptors.

3.3 Vapor Inhalation of Chemicals in Indoor Air

Risk characterization involves estimating the magnitude of the potential adverse health effects that could occur due to chronic, long-term exposure to chemicals identified in soil vapor at the Site. The risk characterization is based on the results of the dose-response (toxicity) and exposure assessment.

Chemicals may migrate through environmental media from their source to a point where human receptors may be exposed. Therefore, it was necessary to determine if the detected VOCs (given their residual concentrations, locations, soil physical characteristics, weather conditions, etc.) could potentially migrate to the surface (where human receptors may be exposed).

Screening-level models were used to predict indoor air concentrations that may result from the chemical vapors potentially released from soil vapor under the Site. The estimated vapor flux and indoor air concentrations were then used to estimate potential health risk that may result from on-Site exposures. For purposes of this evaluation, two scenarios were evaluated: (1) use of the land as a school; and (2) hypothetical residential use.

In this evaluation, maximum concentrations detected in soil vapor were conservatively used as representative of chemical concentrations present in soil vapor under the Site.

CalEPA's VI Guidance recommends that multiple lines of evidence be used when evaluating the potential risk and hazard posed by vapor intrusion. DTSC recommends that the indoor air chemical concentrations that can result from vapor intrusion be estimated using the following equation:

$$AF = \frac{C_{indoor}}{C_{soil\ gas}}$$

Where:

AF = Attenuation factor (unitless)

C_{indoor} = Indoor air concentration (micrograms per cubic meter [ug/m^3])

$C_{soil\ gas}$ = Soil gas concentration (ug/m^3)

Using the above equation, the indoor air chemical concentration can be estimated by multiplying the known soil vapor concentration by the AF.

The default AF of 0.03 was used in accordance with the DTSC (2023) Guidance. Furthermore, maximum COPC concentrations detected on Site are from a soil vapor probe that is located in the northeastern portion of the Site, beneath a blacktop recreation area that is not located near any school buildings. The estimated indoor air VOC concentrations are presented in Table 3.

The models assume that the concentrations in indoor air are proportional to the flux throughout the soil column, and that a vapor infiltrating into the building through the foundation floor is uniformly and instantaneously mixed within the air space in the lowest occupied floor of the building. Because this model ignores a number of possible mitigating factors, it likely over-predicts the chemical flux to indoor air. However, because of its simplicity and conservatism, this approach provides a method to estimate the likely maximum rate at which chemicals would be transported to the surface soils and into a building.

The indoor air chemical concentrations estimated to result from the volatilization of VOCs could be considered to represent a "worst-case" estimate. In the calculations, it was assumed that single chemical compounds are volatilizing, traveling alone through the vadose zone and escaping to ambient air. In reality, all chemicals detected at the Site are competing with each other for available soil-pore space. It is well known that chemical volatilization and migration is limited by the vapor saturation in the vadose zone.

4 TOXICITY ASSESSMENT

In order to evaluate the potential adverse effects associated with exposure to COPCs, the relationship between the dose of each chemical and the incidence or potential of an adverse health effect in an exposed population must be determined. This is known as the dose-response assessment and is based on data collected from animal studies and theoretical precepts about what might occur in humans.

This HHRA considers both carcinogenic and non-carcinogenic health effects associated with chemical exposures based on dose-response criteria published by various regulatory agencies.

In this HHRA, chronic toxicity criteria were selected in accordance with the DTSC Regulation "Toxicity Criteria for Human Health Risk Assessment" (effective September 2018) (https://dtsc.ca.gov/LawsRegsPolicies/Regs/Toxicity-Criteria-for-Human-Health-Risk-Assessment). Toxicity information was obtained from the following sources in the hierarchy shown:

1) DTSC HERO HHRA Note 10 (DTSC, 2025c);
2) DTSC HERO HHRA Note 3 (DTSC, 2025b);
3) EPA Regional Screening Levels (RSLs) for Chemical Contaminants at Superfund sites (EPA, 2024);
4) San Francisco Bay Regional Water Quality Control Board (SFRWQCB). User's Guide: Compilation and Application of Environmental Screening Levels (ESLs) (SFRWQCB, 2025).

4.1 Non-Carcinogenic Dose-Response Criteria

It is widely accepted that most biological effects of chemical substances occur only after a threshold dose is reached. For the purpose of establishing non-carcinogenic criteria levels, this threshold dose is usually derived from either the no observed adverse effect level (NOAEL) or the lowest observed adverse effect level (LOAEL), as determined in chronic animal exposure studies. The NOAEL is defined as the highest dose at which no adverse effects occur, while the LOAEL is

defined as the lowest dose at which adverse effects begin to appear. NOAELs and LOAELs are used by the EPA to establish reference doses (RfDs) for acceptable levels of human intake.

A RfD is the dose of a chemical that is not expected to cause adverse health effects over a lifetime of daily exposure in the most sensitive population. Uncertainty factors are used to set RfDs, representing an attempt to account for limitations in the quality or quantity of available data. Most RfDs include a 100-fold safety factor that is based on 1) a factor of 10 to account for uncertainties in extrapolating animal data to human health effects, and 2) another 10-fold safety factor to account for differences in sensitivity within the human population. Furthermore, if an available database is incomplete, or if the involved chemical is persistent or bioaccumulative, additional 10-fold safety factors may be applied. Reference doses for chemicals detected in soil are compiled in Table 4. Reference doses for VOCs detected in soil vapor are summarized in Table 5.

4.2 Carcinogenic Dose-Response Criteria

The currently accepted regulatory approach assumes that all potentially carcinogenic chemicals should be treated as if they do not have thresholds. This regulatory approach, which was used to evaluate carcinogenic risk for this HHRA, assumes that the dose-response curve for carcinogens allows for zero risk at zero dose (i.e., for all doses, some cancer risk is assumed to be present). Since animal testing is performed at relatively high doses for the purposes of eliciting a carcinogenic response, various mathematical models are used to estimate the theoretically plausible response at low doses. The accuracy of the projected risk depends on how well the model predicts the true relationship between dose and risk at levels where this relationship cannot actually be measured.

Health risk for exposures to carcinogens is defined in terms of probability. The probability quantifies the likelihood of a carcinogenic response in an individual that receives a given dose of a particular compound. This probability is calculated based on the potential dose and the cancer slope factor (CSF) for a chemical.

The CSF, which is expressed in units of inverse milligrams per kilogram-day $(mg/kg\text{-}day)^{-1}$, is the 95UCL of the probability of carcinogenic response per unit daily intake of a chemical over a lifetime. The CSF multiplied by the lifetime average daily intake of the chemical (dose) provides an estimate of the 95UCL of the theoretical cancer risk for the specific dose. The CSFs used in this HHRA to estimate carcinogenic risk are presented in Table 4.

For the inhalation pathway, cancer risk is calculated based on the potential exposure concentration and the inhalation unit risk (IUR) for a chemical. The IUR, which is expressed in

units of inverse micrograms per cubic meter $(\mu g/m^3)^{-1}$, is the 95UCL of the probability of carcinogenic response per unit daily exposure to a given chemical concentration over a lifetime. The IUR multiplied by the lifetime exposure concentration of the chemical provides an estimate of the 95UCL of the theoretical cancer risk for the specific chemical. The IURs used in this evaluation to estimate carcinogenic dose-assessment risk are presented in Table 5.

In this assessment, chronic toxicity criteria were selected in accordance with the DTSC Regulation "Toxicity Criteria for Human Health Risk Assessment" (effective September 2018) (https://dtsc.ca.gov/LawsRegsPolicies/Regs/Toxicity-Criteria-for-Human-Health-Risk-Assessment). Toxicity information was obtained from the DTSC HERO HHRA Note Number 10, Toxicity Criteria (DTSC, 2025c).

5 RISK CHARACTERIZATION

Risk characterization combines information obtained in the exposure assessment and fate and transport modeling with toxicological parameters to obtain an estimate of potential health effects. Risk characterization is conducted in two distinct steps. First, quantification of the daily intake (dose) of the chemical is estimated. Intake assumptions including absorption and bioavailability factors, frequency and duration of exposure, age of receptor, body weight, and exposure rates are used to calculate the dose. The second step in the risk characterization process compares the estimated daily dose to cancer potency factors and reference doses to obtain an estimate of potential health risk and hazard.

Results of the risk characterization represent the "worst case" scenario based on maximum COPCs detected at the Site and are intended to assess the potential for risk without mitigation. Furthermore, as mentioned in Section 3.3, the soil vapor intrusion to indoor air risk characterization, assumes single COPCs are volatilizing in the vadose zone and migrating directly into ambient air, and does not take into account a number of possible mitigating factors.

5.1 Average Daily Dose / Lifetime Daily Dose

This section discusses the methods used to quantify the average daily dose (ADD) of COPCs that may be received by the potential receptors from the ingestion, dermal contact, and inhalation of chemicals detected in soil and soil gas at the Site. An ADD is calculated to estimate non-carcinogenic health hazard. A lifetime daily dose (LDD) is calculated to obtain the potential lifetime doses of carcinogenic chemicals that are received by the potential receptors.

The general equation used to estimate the average daily dose for ingestion and dermal contact exposures is:

$$\mathrm{ADD} = \frac{\mathrm{EPC_{soil}} \times \mathrm{CR} \times \mathrm{EF} \times \mathrm{ED} \times \mathrm{CF}}{\mathrm{BW} \times \mathrm{AT} \times 365}$$

Where:

ADD = Average daily intake (mg/kg/day)

EPC = Exposure point concentration (e.g., mg/kg soil or mg/m^3 vapor or airborne dust particles)

CR = Contact rate; the amount of medium contacted per unit of time or event (e.g., soil ingestion rate [mg/hour])

CF = Unit conversion factor (e.g., 1E-06 kg/mg)

EF = Exposure frequency (days/year)

ED = Exposure duration (years)

BW = Body weight (kg)

AT = Averaging time (years)

The Lifetime ADD (LADD) is estimated using the same equation. The only difference is that the averaging time (AT) is assumed to be an average human lifetime (70 years). For the inhalation exposure pathway, EPA (2009) recommends that when estimating risk or hazard via inhalation, the concentration of the chemical in air (e.g., μg/m^3) should be used as the exposure metric rather than inhalation intake of a COPC in air based on an inhalation rate and body weight (e.g., mg/kg-day). Therefore, the ADD for the inhalation pathway is replaced with an exposure concentration factor (EC), as follows:

$$\mathrm{EC_{inh}} = \frac{\mathrm{EPC_{soil}} \times \mathrm{EF} \times \ \mathrm{ED} \times \ \mathrm{ET}}{\mathrm{AT} \times \ \mathrm{PEF}}$$

Where:

EC_{inh} = Exposure concentration factor of COPC in outdoor air from soil (kg/m3)

EPC_{soil} = Exposure point concentration (e.g., mg/kg soil)

EF = Exposure frequency (days/year)

ED = Exposure duration (years)

ET = Exposure time (24 hrs for a resident)

AT = Averaging time (years)

PEF = Particulate emission factor for soil (m^3/kg)

The default exposure parameters used in this HHRA for hypothetical residential receptors are based on approximate typical exposure conditions (DTSC, 2025a). These parameters are summarized in Table 2.

5.2 Soil Exposure Non-Carcinogenic Health Hazards

The potential for adverse noncancer effects due to exposure to an individual COPC is expressed as the hazard quotient (HQ). COPC-specific HQs are estimated by calculating the ratio of the ADDs for ingestion or dermal exposures to the chronic RfD, and the exposure concentration (EC_{inh}) to the inhalation reference concentration (RfC). The following equations are used to estimate the noncancer HQ for direct contact and outdoor inhalation exposures, respectively:

$$\mathrm{HQ_{oral/dermal}} = \frac{\mathrm{ADD}}{\mathrm{RfD}}$$

$$\mathrm{HQ_{inh}} = \frac{\mathrm{EC_{inh}}}{\mathrm{RfC}}$$

The HQs for each COPC and all exposure pathways were summed to estimate the total hazard index (HI) for hypothetical on-Site residents, as follows:

$$HI = \sum_{n}^{1} HQ_i$$

Where:

HI = Hazard index, unitless

HQi = as defined above, unitless

Since children are known to be more sensitive to chemical exposures, HQs and HIs estimated for children are higher than those estimated for adult receptors. Therefore, it is customary in risk assessments to report only HQs and HIs estimated for child receptors for the residential scenario. This reporting convention is followed in this HHRA.

The estimated HIs are compared to an acceptable hazard level. Implicit in the HI is the assumption of a threshold level of exposure below which no adverse effects are expected to occur. For example, if the HI exceeds unity (because Site-specific exposure exceeds the RfD), then the potential for non-cancer adverse effects may exist. In general, the greater the value above 1, the

greater the potential hazard. In contrast, HIs equal to or less than 1 indicate that no adverse health effects are expected to occur from exposure to chemicals at the Site.

Using maximum detected soil chemical concentrations, the total HIs estimated in this HHRA from exposures to soil via incidental ingestion, dermal contact, and inhalation of outdoor air were:

- 0.3 for School Staff (Table 6).
- 0.4 for School Students (Table 6).
- 70 for hypothetical residential receptors (Table 7).

For the School Exposure Scenario, the maximum concentrations of COPCs detected in the top 1-foot soil from landscaped areas were utilized for evaluation because any sample results below 1-foot are not part of the exposure pathway. Soil sample concentrations from boring locations under hardscape areas (i.e., asphalt, concrete, building foundation) were not used for the School Exposure Scenario because the hardscape material eliminates the potential incidental ingestion, dermal contact, and inhalation of outdoor air exposure pathways. The HIs estimated for the current School Exposure Scenario are below 1 and therefore considered acceptable under California environmental health and safety regulations.

By comparison, the HI estimated for the Hypothetical Residential Exposure Scenario exceeded the value of 1. For the Hypothetical Residential Exposure Scenario, the HHRA conservatively utilized the maximum COPC concentrations for all sampling locations and depths even though (1) residential use is not anticipated, and (2) exposure to COPCs at all depths is not anticipated. The COPCs primarily responsible for the exceedance (i.e., the risk drivers) were antimony, cadmium, cobalt, copper, thallium, total dioxins (TEQ), and TPHd (Table 7). Supporting calculations are presented in Appendices A and B.

5.3 Soil Exposure Cancer Risk Estimates

Cancer risk is expressed as the upper-bound, increased likelihood of an individual developing cancer as a result of exposure to a particular chemical. For example, a cancer risk of 1E-04 refers to an upper-bound increased chance of 1 in 10,000 of developing cancer over a lifetime (0.01% risk). The potential increase in cancer risk from exposure to the COPCs detected in soil at the Site is in addition to a background risk of Americans developing cancer. The background risk is 1 chance in 3 (0.3 or 3E-01) for every American female, and 1 chance in 2 (0.5 or 5E-01) for every American male, of eventually developing cancer (ACS, 2020).

The excess cancer risks were compared to the risk level considered acceptable by federal and state regulatory agencies. The target cancer risk level (benchmark) identified by the DTSC as acceptable in the PEA Guidance Manual is 1 in 1,000,000 (1E-06). However, the EPA has established acceptable incremental cancer risk levels to be within the risk management range of 1 in 10,000 (1E-04) and 1E-06; risks greater than 1E-04 are generally considered unacceptable.

Each COPC-specific cancer risk (CR) is estimated by multiplying the LADD for ingestion or dermal exposures by the COPC-specific CSF, or by multiplying the EC_{inh} by the IUR factor for inhalation exposures, to arrive at a unitless probability (e.g., 1E-06) of an individual developing cancer.

$$\mathrm{CR_{oral/dermal}} = \mathrm{LADD} \times \mathrm{CSF}$$

$$\mathrm{CR_{inh}} = \mathrm{EC_{inh}} \times \mathrm{IUR}$$

The CRs for each COPC and all exposure pathways were summed to estimate the total CR for hypothetical on-Site residents, as follows:

$$\mathrm{CR_{total}} = \sum_{i=1}^{n} (\mathrm{CR_i})$$

Where:

CR_{total} = Total cancer risk from all COPCs, unitless

CRi = cancer risk from individual COPC I detected in soil, unitless

The incremental cancer risks estimated for exposures to COPC-impacted soil and dust through the ingestion, dermal and inhalation pathway are:

- 4E-06 for School Staff (Table 6).
- 7E-07 for School Students (Table 6).
- 4E-05 for hypothetical residential receptors (Table 7).

The cancer risk estimated for the School Students Exposure Scenario is less than 1E-06 and therefore, considered acceptable under California environmental health and safety regulations and risk evaluation practices.

The cancer risk estimated for the School Exposure Scenario for staff and Hypothetical Residential Exposure Scenarios exceeded the DTSC's benchmark of 1E-06 (1 in 1,000,000). Incremental risk

for school staff is slightly above the 1E-06 benchmark, calculated as an incremental risk of 4 in 1,000,000, within the risk management range. The risk driver responsible for the exceedance for school staff was total dioxins (Table 6). This estimated cancer risk is based on two inputs, which tends to overestimate the risk: (1) the maximum dioxin TEQ, and (2) the toxicity of 2,3,7,8-TCDD, the most toxic dioxin. When the calculation is performed under a more realistic exposure scenario using the 95UCL dioxin TEQ for surface and shallow soils (8.93 picograms per gram [pg/g]), the estimated cancer risk for school staff is 1E-06, which is equal to the DTSC's benchmark of 1E-06 and therefore considered acceptable. Further, we note that all dioxin TEQs within surface and shallow soil are below the DTSC soil remedial goal of 50 pg/g (DTSC, 2017), and no 2,3,7,8-TCDD concentrations within the top foot of soil exceed the DTSC SL. As a result, it is reasonable to conclude that the incremental cancer risk for school staff is at or below the 1E-06 benchmark.

For the Hypothetical Residential Scenario, the HHRA conservatively utilized the maximum COPC concentrations for all sampling locations and depths even though (1) residential use is not anticipated, and (2) exposure to COPCs at all depths is not anticipated. Supporting calculations for each exposure scenario are presented in Appendices A and B.

5.4 Vapor Intrusion Non-Carcinogenic Health Hazard

For the inhalation exposure pathway, the HQ is defined as the ratio of the exposure concentration (EC) to the RfC. The HQ can be expressed according to the following equation:

$$HQ = \frac{EC}{RfC}$$

Where:

HQ = Hazard quotient, unitless

EC = Exposure concentration, $\mu g/m^3$

RfC = Reference concentration, $\mu g/m^3$

The estimated HQs are compared to an acceptable hazard level. Implicit in the HQ is the assumption of a threshold level of exposure below which no adverse effects are expected to occur. For example, if the HQ exceeds unity (because Site-specific exposure exceeds the RfC), then the potential for non-cancer adverse effects may exist. In general, the greater the value above 1, the greater the potential hazard. In contrast, HQs equal to or less than 1 indicate that no adverse health effects are expected to occur from exposure to chemicals at the Site.

According to the EPA (1989), if the HQ is equal to or less than 1, there is no concern for potential chronic adverse health effects from the chemical exposures. The HQs estimated for the exposure scenarios evaluated were:

- 0.7 for School Staff (Table 8).
- 0.5 for School Students (Table 9).
- 3 for Hypothetical Residential Receptors (Table 10).

Only the HQs estimated for the hypothetical residential receptors exceeded the benchmark value of 1, and the risk driver was TPHg (Table 10).

5.5 Vapor Intrusion Cancer Risk Characterization

Inhalation cancer risk was calculated in accordance with DTSC (2015) and EPA (1989) guidelines.

$$Risk = EC \bullet IUR$$

Where:

Risk = Upper bound incremental lifetime carcinogenic risk, unitless

EC = Exposure concentration, $\mu g/m^3$

IUR = Inhalation unit risk, $(\mu g/m^3)^{-1}$

Using the maximum detected VOC concentrations, the cancer risks estimated for the exposure scenarios were:

- 4E-06 for School Staff (Table 11).
- 3E-07 for School Students (Table 12).
- 2E-05 for the Hypothetical Residential Exposure Scenario (Table 13).

The cancer risk estimated for the School Student receptors is below the benchmark value of 1E-06. The cancer risk estimated for School Staff is slightly above the 1E-06 benchmark (calculated

as an incremental risk of 4 in 1,000,000), and is within the EPA's risk management range.[3] The Hypothetical Residential receptors exceeded the 1E-06 benchmark, and is within the EPA's risk management range. The risk driver for the exceedance for School Staff was ethylbenzene (Table 12), based on a detection from a soil vapor probe that is located in the northeastern portion of the Site, beneath a blacktop recreation area not near any school buildings. The risk drivers for the Hypothetical Residential Exposure Scenario were benzene, ethylbenzene, and naphthalene (Table 13).

6 CONCLUSIONS AND RECOMMENDATIONS

Current regulatory guidance requires risk assessments to be health-protective in nature, meaning they are designed to overestimate, rather than underestimate, potential health risks based on current and proposed site uses. As a result, the actual risks at the Site are likely lower than those described in the HHRA. Results of the HHRA indicate that:

Soil and Dust Exposure

- Arsenic was detected in soil at concentrations greater than the Site-specific background concentration of 15 mg/kg, and lead was detected in soil at concentrations greater than the DTSC's screening level of 80 mg/kg, which could pose a potential risk without mitigation.
- 95UCL calculations show that arsenic and lead concentrations in the top foot of soil are below applicable SLs. The Site's existing cover prevents Site users from direct exposure to elevated arsenic and lead concentrations in soil.
- Exposure to other COPCs detected in shallow soil (0 to 1 foot bgs) do not pose a health hazard for current staff and students for direct exposure (Table 6).
- The incremental cancer risk estimated for the school students is below the 1E-06 benchmark (Table 6).
- The incremental cancer risk estimated for the school staff is above the 1E-06 benchmark but is within the risk management range (Table 6).
- The incremental cancer risk estimated for the school staff slightly exceeds the 1E-06 benchmark when based on the maximum dioxin TEQ and using the toxicity from the most toxic of the dioxins. However, under a more realistic exposure scenario that uses the 95UCL

[3] A calculated incremental risk of 4E-06 corresponds to an incremental risk of 4 in 1,000,000 as compared to the acceptable risk of 1 in 1,000,000 and is at the lower end of the EPA risk management range.

dioxin TEQ for shallow soils (8.93 pg/g), the estimated cancer risk for school staff is 1E-06, which is equal to the DTSC's benchmark of 1E-06 and therefore considered acceptable.

- Exposure to maximum concentrations of COPCs detected in soil within the landfill waste could, if not mitigated, pose a cancer risk and/or health hazard to the hypothetical residential receptor (Table 7).

Vapor Intrusion to Indoor Air Exposure

- VOCs detected in soil vapor do not pose a health hazard for current students or school staff for indoor air exposures (Tables 8 and 9).

- The incremental cancer risk estimated for the school students is below the 1E-06 benchmark for indoor air exposures (Table 12).

- The incremental cancer risk estimated for the school staff is slightly above the 1E-06 benchmark for indoor air exposures, based on maximum COPC concentrations from a soil vapor probe not near any buildings and an assumed exposure duration of 25 years (Table 11).

- For the hypothetical residential receptor, indoor air exposures to VOCs detected in soil vapor could, if not mitigated, pose a health hazard and a cancer risk (Tables 10 and 13).

Groundwater Exposure

- The groundwater exposure pathway is incomplete and does not present a risk.

The risk and hazard calculations assumed multiple exposures to chemicals via incidental soil ingestion, dermal contact, outdoor inhalation, and inhalation of indoor vapors in accordance with EPA and DTSC guidance. The results are based on multiple health-protective assumptions. For example, it was assumed that a VOC reservoir is located under the Site and that this VOC reservoir is unlimited in concentrations that are continuously released as vapors for up to 26 years.

All conclusions and recommendations presented in this HHRA are based on reported COPC concentrations and the current use of the Site as a middle school and the hypothetical future land use of the Site as residential. In this risk assessment, all fate-and-transport models, parameters, toxicity data and assumptions were applied in accordance with federal and state regulatory guidelines. These guidelines are meant to protect the public and tend to overestimate potential health risk. The residential scenario provides the most conservative assessment in regards to the potential receptors (adults and children within first 6 years of life) and exposure timeframe. The default AF of 0.03 was used to assess risk related to vapor intrusion and is considered protective of public health. As such, this risk assessment provides an estimate of the upper boundary of potential health risk, rather than an accurate representation of true health risk posed by the Site.

Further, we note that the purpose of the HHRA is to identify potential risk and hazard that will need to be addressed in the plans for the proposed school redevelopment project.

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TABLES

Table 1 – Exposure Parameters for On-Site Receptors - School Exposure Scenario				
Exposure/Site Specific Parameters	Units	School Exposure Parameters		
		Staff	Student	Source
Soil Ingestion Rate (IR-S)	mg/day	100	100	DTSC 2004
Skin Surface Area (SA)	cm^2/day	6,032	2,373	DTSC 2025
Skin Adsorption Factor (ABS)	unitless	chem-specific	chem-specific	DTSC 1994/EPA 1997
Adherence Factor (AF)	mg/cm^2	0.20	0.80	DTSC 2004
Fraction of Soil Exposed (FE)	unitless	1	1	Default
Exposure Frequency (EF)	days/year	250	180	DTSC 2004
Exposure Frequency (dermal; EFd)	days/year	250	180	DTSC 2004
Exposure Duration (ED)	years	25	3	Site-specific
Exposure Time (ET)	hours	8	6	Site-specific
Conversion Factor (CF)	kg/mg	1.0E-06	1.0E-06	--
Body Weight (BW)	kg	80	47.9	DTSC 2025
Averaging Time for Noncarcinogens (AT_n)	days	9,125	1,095	EPA 1989 (ED*365 days/yr)
Averaging Hours for Noncarcinogens (AT_n)	hours	219,000	26,280	EPA 1989 (ED*365 days/yr)
Averaging Time for Carcinogens (AT_c)	days	25,550	25,550	EPA 1989
Averaging Hours for Carcinogens (AT_c)	hours	613,200	613,200	EPA 1989

Table 2 – Exposure Parameters for On-Site Receptors - Hypothetical Residential Exposure Scenario				
Exposure Parameters	Units	Residential Scenario		Source
		Adult	Child	
Soil Ingestion Rate (IR-S)	mg/day	100	200	DTSC 2025
Skin Surface Area (SA)	cm^2/day	6,032	2,373	DTSC 2025
Skin Adsorption Factor (ABS)	unitless	chem-specific	chem-specific	DTSC 1994/USEPA 1997a
Adherence Factor (AF)	mg/cm^2	0.07	0.20	DTSC 2025
Fraction of Soil Exposed (FE)	unitless	1.0	1.0	Default
Exposure Frequency (EF)	days/year	350	350	DTSC 2025
Exposure Frequency (dermal; EFd)	days/year	350	350	DTSC 2025
Exposure Duration (ED)	years	20	6	DTSC 2025
Exposure Time (ET)	hours/day	24	24	DTSC 2025
Conversion Factor (CF)	kg/mg	1.0E-06	1.0E-06	--
Body Weight (BW)	kg	80	15	DTSC 2025
Averaging Time for Noncarcinogens (AT_n)	days	7,300	2,190	USEPA 1989 (ED*365 dys/yr)
Averaging Hours for Noncarcinogens (AT_n)	hours	175,200	52,560	USEPA 2009
Averaging Time for Carcinogens (AT_c)	days	25,550	25,550	USEPA 1989
Averaging Hours for Carcinogens (AT_c)	hours	613,200	613,200	USEPA 2009

Table 3 – Indoor Air Exposure Point Concentrations Estimated for Hypothetical Residential and Current School Exposure Scenarios

Chemical of Potential Concern (COPC)	CAS Number	Maximum Detected Soil Gas Concentration (ug/m^3)	Estimated Indoor Chemical Air Concentration (ug/m^3)
Trihalomethanes			
Chloroform	67663	1.5	NE
Chlorinated VOCs			
1,1,1-Trichloroethane	71556	110	3.30E+00
1,2-Dichloroethane	107062	1.2	3.60E-02
1,4-Dichlorobenzene	106467	7	2.10E-01
Chlorobenzene	108907	15	4.50E-01
Freons	75694	47	1.41E+00
Trichloroethene	79016	4.7	1.41E-01
Vinyl Chloride	75014	0.3	9.00E-03
Petroleum Hydrocarbons			
1,2,4-Trimethylbenzene	95636	36	1.08E+00
1,3,5-Trimethylbenzene	108678	28	8.40E-01
2-Butanone	78933	14	4.20E-01
2,2,4-Trimethylpentane	95636	17	5.10E-01
Acetone	67641	72	2.16E+00
Benzene	71432	17	5.10E-01
Carbon Disulfide	75150	18	5.40E-01
Cumenes	98828	75	2.25E+00
Ethylbenzene	100414	270	8.10E+00
Hexanes	110543	1870	5.61E+01
Naphthalene	91203	7.2	2.16E-01
Propylbenzene	103651	12	3.60E-01
Styrene	100425	14	4.20E-01
Toluene	108883	38	1.14E+00
Xylenes, total	95476	206	6.18E+00
TPH-g	E1790666	53000	1.59E+03

Notes:
Attenuation factor for chlorinated VOCs (unitless) = 0.03
Attenuation factor for petroleum-derived VOCs (unitless) = 0.03
ug/m^3 = micrograms per cubic meter
NA = Not applicable or not available
NE = Not evaluated

Table 4 – Toxicity Criteria for Chemicals of Potential Concern in Soil				
Chemical	Chronic Oral Reference Dose (RfDo) [mg/kg-day]	Inhalation Reference Concentration (RfCi) [ug/m^3]	Oral Cancer Slope Factor (CSFo) [mg/kg-day]$^{-1}$	Inhalation Unit Risk (IUR) [ug/m^3]$^{-1}$
Metals				
Antimony	4.0E-04	3.0E-01	NA	NA
Barium	2.0E-01	5.0E-01	NA	NA
Beryllium	2.0E-04	7.0E-03	NA	2.4E-03
Cadmium	1.0E-04	1.0E-02	NA	4.2E-03
Chromium (VI)	9.0E-04	3.0E-02	5.0E-01	1.5E-01
Cobalt	3.0E-04	6.0E-03	NA	9.0E-03
Copper	4.0E-02	NA	NA	NA
Nickel	1.1E-02	1.4E-02	NA	2.6E-04
Mercury	1.6E-04	3.0E-02	NA	NA
Molybdenum	5.0E-03	2.0E+00	NA	NA
Selenium	5.0E-03	2.0E+01	NA	NA
Silver	5.0E-03	NA	NA	NA
Thallium	1.0E-05	NA	NA	NA
Vanadium	5.0E-03	1.0E-01	NA	NA
Zinc	3.0E-01	NA	NA	NA
Pesticides				
4,4'-DDT	5.0E-04	NA	3.4E-01	9.7E-05
4,4'-DDD	5.0E-04	NA	2.4E-01	6.9E-05
Chlordane	5.0E-04	7.0E-01	3.5E-01	1.0E-04
PCBs				
Aroclor-1248	NA	NA	2.0E+00	5.7E-04
Aroclor-1260	NA	NA	2.0E+00	5.7E-04
Aroclor-1268	NA	NA	2.0E+00	5.7E-04
SVOCs				
1-Methylnaphthalene	7.0E-02	3.0E-03	5.1E-02	1.3E-05
2-Methylnaphthalene	4.0E-03	1.6E+01	NA	NA
Naphthalene	2.0E-02	3.0E+00	1.2E-01	3.4E-05
Acenaphthylene	6.0E-02	2.4E+02	NA	NA
Acenaphthene	6.0E-02	2.4E+02	NA	NA
Fluorene	4.0E-02	1.6E+02	NA	NA
Phenanthrene	4.0E-02	1.6E+02	NA	NA
Anthracene	3.0E-01	1.2E+03	NA	NA
Fluoranthene	4.0E-02	NA	NA	NA
Pyrene	3.0E-02	1.2E+02	NA	NA
Benzo[a]anthracene	NA	NA	1.0E-01	1.1E-04
Chrysene	NA	NA	1.0E-03	1.1E-05
Benzo[b]fluoroanthene	NA	NA	1.0E-01	1.1E-04
Benzo[k]fluoroanthene	NA	NA	1.0E-02	1.1E-04
Benzo[a]pyrene	3.0E-04	2.0E-03	1.0E+00	1.1E-03
Indeno[1,2,3-cd]pyrene	NA	NA	1.0E-01	1.1E-04
Dibenz[a,h]anthracene	NA	NA	4.1E+00	1.2E-03
Dioxins				
Total Dioxins*	7.0E-10	4.0E-05	1.3E+05	3.8E+01
TPH				
TPH (C5-C8 aliphatic low)	3.9E-02	6.2E+02	NA	NA
TPH (C9-C18 aliphatic medium)	1.9E-02	1.9E+02	NA	NA
TPH (C19-C32 aliphatic high)	1.5E-01	NA	NA	NA

Notes:

Values taken from HHRA Note No. 10, 2025

mg/kg = milligrams per kilogram

ug/m^3 = micrograms per cubic meter

* = Toxicity data for 2,3,7,8-TCDD

Table 5 – Toxicity Criteria for Chemicals of Potential Concern in Soil Vapor		
Chemical	**Chronic Inhalation Reference Concentration (RfC) (ug/m^3)**	**Inhalation Unit Risk $(ug/m^3)^{-1}$**
Trihalomethanes		
Chloroform	2.0E+00	2.3E-05
Chlorinated VOCs		
1,1,1-Trichloroethane	1.0E+03	NA
1,2-Dichloroethane	7.0E+00	2.6E-05
1,4-Dichlorobenzene	8.0E+02	1.1E-05
Chlorobenzene	5.0E+01	NA
Freons	5.0E+03	NA
Trichloroethene	2.0E+00	4.1E-06
Vinyl Chloride	5.1E+01	7.8E-05
Petroleum Hydrocarbons		
1,2,4-Trimethylbenzene	6.0E+01	NA
1,3,5-Trimethylbenzene	6.0E+01	NA
2-Butanone	5.0E+03	NA
2,2,4-Trimethylpentane	6.0E+01	NA
Acetone	3.1E+04	NA
Benzene	3.0E+00	2.9E-05
Carbon Disulfide	7.0E+02	NA
Cumenes	4.0E+02	NA
Ethylbenzene	1.0E+03	2.5E-06
Hexanes	7.0E+02	NA
Naphthalene	3.0E+00	3.4E-05
Propylbenzene	1.0E+03	NA
Styrene	9.0E+02	NA
Toluene	4.2E+02	NA
Xylenes, total	1.0E+02	NA
TPH-g	6.0E+02	NA

Notes:
Source = Cal/EPA HHRA Note No. 10, 2019
NA = Not applicable or not available

Table 6 – Estimated Cumulative Risks and Hazards, Multi-Pathway Soil Exposures - School Exposure Scenario

COPC	School Exposure Scenario				
	School EPC (mg/kg)	Cancer Risk		Hazard Index	
		Staff	Student	Staff	Student
Metals					
Antimony	4	--	--	1.E-02	1.E-02
Barium	240	--	--	1.E-03	2.E-03
Beryllium	0.72	1.E-10	7.E-12	3.E-03	4.E-03
Cadmium	0.78	2.E-10	1.E-11	7.E-03	8.E-03
Chromium (III)	79	--	--	5.E-05	6.E-05
Chromium (VI)	1.3	2.E-07	3.E-08	1.E-03	2.E-03
Cobalt	20	1.E-08	7.E-10	6.E-02	8.E-02
Copper	94	--	--	2.E-03	3.E-03
Nickel	96	2.E-09	1.E-10	1.E-02	1.E-02
Mercury	1.7	--	--	1.E-02	1.E-02
Molybdenum	1.6	--	--	3.E-04	4.E-04
Silver	21	--	--	4.E-03	5.E-03
Vanadium	54	--	--	1.E-02	1.E-02
Zinc	1600	--	--	5.E-03	7.E-03
Pesticides					
4,4'-DDT	0.015	3.E-09	4.E-10	4.E-05	6.E-05
Dioxins					
Total Dioxins	3.0E-05	3.E-06	7.E-07	1.E-01	2.E-01
TPH					
TPH (C9-C18 aliphatic medium)	120	--	--	1.E-02	2.E-02
TPH (C19-C32 aliphatic high)	420	--	--	5.E-03	8.E-03
TOTAL RISKS and HAZARDS		**4.E-06**	**7.E-07**	**3.E-01**	**4.E-01**

Notes:

" -- " Not Applicable

Includes Incidental Soil Ingestion, Dermal Contact, and Fugitive Dust Inhalation.

EPC: Exposure Point Concentration in milligrams per kilogram used in the risk and hazard calculations

Table 7 – Estimated Cumulative Risks and Hazards, Multi-Pathway Soil Exposures - Hypothetical Residential Exposure Scenario			
COPC	Residential Exposure Scenario		
	Maximum Detected Concentration (mg/kg)	Cancer Risk	Hazard Index
		Adult & Child	Child
Metals			
Antimony	290	--	9.E+00
Barium	4900	--	3.E-01
Beryllium	1.1	7.E-10	7.E-02
Cadmium	180	2.E-07	2.E+01
Chromium (VI)	1.7	1.E-06	2.E-02
Cobalt	82	2.E-07	4.E+00
Copper	6400	--	2.E+00
Nickel	490	3.E-08	6.E-01
Mercury	15	--	1.E+00
Molybdenum	29	--	8.E-02
Selenium	9.8	--	3.E-02
Silver	21	--	5.E-02
Thallium	16	--	2.E+01
Vanadium	190	--	5.E-01
Zinc	13000	--	6.E-01
Pesticides			
4,4'-DDT	0.015	8.E-09	4.E-04
4,4'-DDD	0.014	6.E-09	7.E-03
Chlordane	0.3	2.E-07	9.E-03
PCBs			
Aroclor-1248	0.14	6.E-07	--
Aroclor-1260	0.098	4.E-07	--
Aroclor-1268	0.071	3.E-07	--
SVOCs			
1-Methylnaphthalene	0.39	4.E-08	1.E-04
2-Methylnaphthalene	0.23	--	1.E-03
Naphthalene	0.2	5.E-08	3.E-04
Acenaphthylene	0.38	--	8.E-06
Acenaphthene	0	--	2.E-04
Fluorene	0.11	--	7.E-04
Phenanthrene	0.61	--	5.E-04
Anthracene	0.026	--	6.E-05
Fluoranthene	1.1	--	2.E-04
Pyrene	1.9	--	5.E-04
Benzo[a]anthracene	0.57	1.E-07	--
Chrysene	0.92	2.E-09	--
Benzo[b]fluoroanthene	1.6	3.E-07	--
Benzo[k]fluoroanthene	0.54	1.E-08	--
Benzo[a]pyrene	1.7	3.E-06	1.E-02
Indeno[1,2,3-cd]pyrene	1.1	2.E-07	--
Dibenz[a,h]anthracene	0.21	2.E-06	--
Dioxins			
Total Dioxins	1.47E-04	4.E-05	6.E+00
TPH			
TPH (C5-C8 aliphatic low)	1700	--	2.E-06
TPH (C9-C18 aliphatic medium)	3200	--	2.E+00
TPH (C19-C32 aliphatic high)	6000	--	3.E+00
TOTAL RISKS and HAZARDS		**4.E-05**	**7.E+01**

Notes:

" -- " = Not Applicable

mg/kg = milligrams per kilogram

Includes Incidental Soil Ingestion, Dermal Contact, and Fugitive Dust Inhalation

EPC: Exposure Point Concentration in milligrams per kilogram used in the risk and hazard calculations

Table 8 – Health Hazards from Inhalation of Indoor Air - School Staff Exposure Scenario				
COPC	Indoor Air Conc. (ug/m^3)	Inhalation Reference Dose (ug/m^3)	School Staff Exposure Scenario	
			Average Exposure Conc_nc (ug/m^3)	Hazard Quotient (Unitless)
Trihalomethanes				
Chloroform	NE	2.0E+00	NE	NE
Chlorinated VOCs				
1,1,1-Trichloroethane	3.3E+00	1.0E+03	7.5E-01	8.E-04
1,2-Dichloroethane	3.6E-02	7.0E+00	8.2E-03	1.E-03
1,4-Dichlorobenzene	2.1E-01	8.0E+02	4.8E-02	6.E-05
Chlorobenzene	4.5E-01	5.0E+01	1.0E-01	2.E-03
Freons	1.4E+00	5.0E+03	3.2E-01	6.E-05
Trichloroethene	1.4E-01	2.0E+00	3.2E-02	2.E-02
Vinyl Chloride	9.0E-03	5.1E+01	2.1E-03	4.E-05
Petroleum Hydrocarbons				
1,2,4-Trimethylbenzene	1.1E+00	6.0E+01	2.5E-01	4.E-03
1,3,5-Trimethylbenzene	8.4E-01	6.0E+01	1.9E-01	3.E-03
2-Butanone	4.2E-01	5.0E+03	9.6E-02	2.E-05
2,2,4-Trimethylpentane	5.1E-01	6.0E+01	1.2E-01	2.E-03
Acetone	2.2E+00	3.1E+04	4.9E-01	2.E-05
Benzene	5.1E-01	3.0E+00	1.2E-01	4.E-02
Carbon Disulfide	5.4E-01	7.0E+02	1.2E-01	2.E-04
Cumenes	2.3E+00	4.0E+02	5.1E-01	1.E-03
Ethylbenzene	8.1E+00	1.0E+03	1.8E+00	2.E-03
Hexanes	5.6E+01	7.0E+02	1.3E+01	2.E-02
Naphthalene	2.2E-01	3.0E+00	4.9E-02	2.E-02
Propylbenzene	3.6E-01	1.0E+03	8.2E-02	8.E-05
Styrene	4.2E-01	9.0E+02	9.6E-02	1.E-04
Toluene	1.1E+00	4.2E+02	2.6E-01	6.E-04
Xylenes, total	6.2E+00	1.0E+02	1.4E+00	1.E-02
TPH-g	1.6E+03	6.0E+02	3.6E+02	6.E-01
Total Hazard Index				**7.E-01**

Notes:

ug/m^3 = micrograms per cubic meter

COPC = chemical of potential concern

NA = Not applicable or not available

NE = Not evaluated

Table 9 – Health Hazards from Inhalation of Indoor Air - School Students Exposure Scenario				
COPC	Indoor Air Conc. (ug/m^3)	Inhalation Reference Dose (ug/m^3)	School Student Exposure Scenario	
			Average Exposure Conc_nc (ug/m^3)	Hazard Quotient (Unitless)
			Student	Student
Trihalomethanes				
Chloroform	NE	2.0E+00	NE	NE
Chlorinated VOCs				
1,1,1-Trichloroethane	3.3E+00	1.0E+03	5.1E-01	5.1E-04
1,2-Dichloroethane	3.6E-02	7.0E+00	5.5E-03	7.9E-04
1,4-Dichlorobenzene	2.1E-01	8.0E+02	3.2E-02	4.0E-05
Chlorobenzene	4.5E-01	5.0E+01	6.9E-02	1.4E-03
Freons	1.4E+00	5.0E+03	2.2E-01	4.3E-05
Trichloroethene	1.4E-01	2.0E+00	2.2E-02	1.1E-02
Vinyl Chloride	9.0E-03	5.1E+01	1.4E-03	2.7E-05
Petroleum Hydrocarbons				
1,2,4-Trimethylbenzene	1.1E+00	6.0E+01	1.7E-01	2.8E-03
1,3,5-Trimethylbenzene	8.4E-01	6.0E+01	1.3E-01	2.2E-03
2-Butanone	4.2E-01	5.0E+03	6.5E-02	1.3E-05
2,2,4-Trimethylpentane	5.1E-01	6.0E+01	7.9E-02	1.3E-03
Acetone	2.2E+00	3.1E+04	3.3E-01	1.1E-05
Benzene	5.1E-01	3.0E+00	7.9E-02	2.6E-02
Carbon Disulfide	5.4E-01	7.0E+02	8.3E-02	1.2E-04
Cumenes	2.3E+00	4.0E+02	3.5E-01	8.7E-04
Ethylbenzene	8.1E+00	1.0E+03	1.2E+00	1.2E-03
Hexanes	5.6E+01	7.0E+02	8.6E+00	1.2E-02
Naphthalene	2.2E-01	3.0E+00	3.3E-02	1.1E-02
Propylbenzene	3.6E-01	1.0E+03	5.5E-02	5.5E-05
Styrene	4.2E-01	9.0E+02	6.5E-02	7.2E-05
Toluene	1.1E+00	4.2E+02	1.8E-01	4.2E-04
Xylenes, total	6.2E+00	1.0E+02	9.5E-01	9.5E-03
TPH-g	1.6E+03	6.0E+02	2.5E+02	4.1E-01
Total Hazard Index				**4.9E-01**

Notes:
ug/m^3 = micrograms per cubic meter
COPC = chemical of potential concern
NA = Not applicable or not available
NE = Not evaluated

Table 10 – Health Hazards from Inhalation of Indoor Air - Hypothetical Residential Exposure Scenario					
COPC	Indoor Air Conc. (ug/m^3)	Inhalation Reference Dose (ug/m^3)	Residential Exposure Scenario		
			Average Exposure Conc_nc (ug/m^3)		Hazard Quotient (Unitless)
			Adult Res.	Child Res.	Child Res.
Trihalomethanes					
Chloroform	NE	2.0E+00	NE	NE	NE
Chlorinated VOCs					
1,1,1-Trichloroethane	3.3E+00	1.0E+03	3.2E+00	3.2E+00	3.2E-03
1,2-Dichloroethane	3.6E-02	7.0E+00	3.5E-02	3.5E-02	4.9E-03
1,4-Dichlorobenzene	2.1E-01	8.0E+02	2.0E-01	2.0E-01	2.5E-04
Chlorobenzene	4.5E-01	5.0E+01	4.3E-01	4.3E-01	8.6E-03
Freons	1.4E+00	5.0E+03	1.4E+00	1.4E+00	2.7E-04
Trichloroethene	1.4E-01	2.0E+00	1.4E-01	1.4E-01	6.8E-02
Vinyl Chloride	9.0E-03	5.1E+01	8.6E-03	8.6E-03	1.7E-04
Petroleum Hydrocarbons					
1,2,4-Trimethylbenzene	1.1E+00	6.0E+01	1.0E+00	1.0E+00	1.7E-02
1,3,5-Trimethylbenzene	8.4E-01	6.0E+01	8.1E-01	8.1E-01	1.3E-02
2-Butanone	4.2E-01	5.0E+03	4.0E-01	4.0E-01	8.1E-05
2,2,4-Trimethylpentane	5.1E-01	6.0E+01	4.9E-01	4.9E-01	8.2E-03
Acetone	2.2E+00	3.1E+04	2.1E+00	2.1E+00	6.7E-05
Benzene	5.1E-01	3.0E+00	4.9E-01	4.9E-01	1.6E-01
Carbon Disulfide	5.4E-01	7.0E+02	5.2E-01	5.2E-01	7.4E-04
Cumenes	2.3E+00	4.0E+02	2.2E+00	2.2E+00	5.4E-03
Ethylbenzene	8.1E+00	1.0E+03	7.8E+00	7.8E+00	7.8E-03
Hexanes	5.6E+01	7.0E+02	5.4E+01	5.4E+01	7.7E-02
Naphthalene	2.2E-01	3.0E+00	2.1E-01	2.1E-01	6.9E-02
Propylbenzene	3.6E-01	1.0E+03	3.5E-01	3.5E-01	3.5E-04
Styrene	4.2E-01	9.0E+02	4.0E-01	4.0E-01	4.5E-04
Toluene	1.1E+00	4.2E+02	1.1E+00	1.1E+00	2.6E-03
Xylenes, total	6.2E+00	1.0E+02	5.9E+00	5.9E+00	5.9E-02
TPH-g	1.6E+03	6.0E+02	1.5E+03	1.5E+03	2.5E+00
Total Hazard Index					**3.1E+00**

Notes:
ug/m^3 = micrograms per cubic meter
COPC = chemical of potential concern
NA = Not applicable or not available
NE = Not evaluated

Table 11 – Cancer Risks from Inhalation of Indoor Air - School Staff Exposure Scenario				
COPC	Indoor Air Conc. (ug/m^3)	Inhalation Slope Factor $(ug/m^3)^{-1}$	School Staff Exposure Scenario	
			Lifetime Exposure Conc_c (ug/m^3)	Cancer Risk (Unitless)
Trihalomethanes				
Chloroform	NE	2.3E-05	NE	NE
Chlorinated VOCs				
1,1,1-Trichloroethane	3.3E+00	NA	2.7E-01	NA
1,2-Dichloroethane	3.6E-02	2.6E-05	2.9E-03	8.E-08
1,4-Dichlorobenzene	2.1E-01	1.1E-05	1.7E-02	2.E-07
Chlorobenzene	4.5E-01	NA	3.7E-02	NA
Freons	1.4E+00	NA	1.1E-01	NA
Trichloroethene	1.4E-01	4.1E-06	1.1E-02	5.E-08
Vinyl Chloride	9.0E-03	7.8E-05	7.3E-04	6.E-08
Petroleum Hydrocarbons				
1,2,4-Trimethylbenzene	1.1E+00	NA	8.8E-02	NA
1,3,5-Trimethylbenzene	8.4E-01	NA	6.8E-02	NA
2-Butanone	4.2E-01	NA	3.4E-02	NA
2,2,4-Trimethylpentane	5.1E-01	NA	4.2E-02	NA
Acetone	2.2E+00	NA	1.8E-01	NA
Benzene	5.1E-01	2.9E-05	4.2E-02	1.E-06
Carbon Disulfide	5.4E-01	NA	4.4E-02	NA
Cumenes	2.3E+00	NA	1.8E-01	NA
Ethylbenzene	8.1E+00	2.5E-06	6.6E-01	2.E-06
Hexanes	5.6E+01	NA	4.6E+00	NA
Naphthalene	2.2E-01	3.4E-05	1.8E-02	6.E-07
Propylbenzene	3.6E-01	NA	2.9E-02	NA
Styrene	4.2E-01	NA	3.4E-02	NA
Toluene	1.1E+00	NA	9.3E-02	NA
Xylenes, total	6.2E+00	NA	5.0E-01	NA
TPH-g	1.6E+03	NA	1.3E+02	NA
Total Cancer Risk				**4.E-06**

Notes:

ug/m^3 = micrograms per cubic meter

COPC = chemical of potential concern

NA = Not applicable or not available

NE = Not evaluated

Table 12 – Cancer Risks from Inhalation of Indoor Air - School Student Exposure Scenario				
COPC	Indoor Air Conc. (ug/m^3)	Inhalation Slope Factor $(ug/m^3)^{-1}$	School Student Exposure Scenario	
			Lifetime Exposure Conc c (ug/m^3)	Cancer Risk (Unitless)
			Student	Student
Trihalomethanes				
Chloroform	NE	2.3E-05	NE	NE
Chlorinated VOCs				
1,1,1-Trichloroethane	3.3E+00	NA	2.2E-02	NA
1,2-Dichloroethane	3.6E-02	2.6E-05	2.4E-04	6.2E-09
1,4-Dichlorobenzene	2.1E-01	1.1E-05	1.4E-03	1.5E-08
Chlorobenzene	4.5E-01	NA	3.0E-03	NA
Freons	1.4E+00	NA	9.3E-03	NA
Trichloroethene	1.4E-01	4.1E-06	9.3E-04	3.8E-09
Vinyl Chloride	9.0E-03	7.8E-05	5.9E-05	4.6E-09
Petroleum Hydrocarbons				
1,2,4-Trimethylbenzene	1.1E+00	NA	7.1E-03	NA
1,3,5-Trimethylbenzene	8.4E-01	NA	5.5E-03	NA
2-Butanone	4.2E-01	NA	2.8E-03	NA
2,2,4-Trimethylpentane	5.1E-01	NA	3.4E-03	NA
Acetone	2.2E+00	NA	1.4E-02	NA
Benzene	5.1E-01	2.9E-05	3.4E-03	9.8E-08
Carbon Disulfide	5.4E-01	NA	3.6E-03	NA
Cumenes	2.3E+00	NA	1.5E-02	NA
Ethylbenzene	8.1E+00	2.5E-06	5.3E-02	1.3E-07
Hexanes	5.6E+01	NA	3.7E-01	NA
Naphthalene	2.2E-01	3.4E-05	1.4E-03	4.9E-08
Propylbenzene	3.6E-01	NA	2.4E-03	NA
Styrene	4.2E-01	NA	2.8E-03	NA
Toluene	1.1E+00	NA	7.5E-03	NA
Xylenes, total	6.2E+00	NA	4.1E-02	NA
TPH-g	1.6E+03	NA	1.1E+01	NA
Total Cancer Risk				**3.1E-07**

Notes:
ug/m^3 = micrograms per cubic meter
COPC = chemical of potential concern
NA = Not applicable or not available
NE = Not evaluated

Table 13 - Cancer Risks from Inhalation of Indoor Air - Hypothetical Residential Exposure Scenario					
COPC	Indoor Air Conc. (ug/m^3)	Inhalation Slope Factor $(ug/m^3)^{-1}$	Residential Exposure Scenario		
			Lifetime Exposure Conc_c (ug/m^3)		Cancer Risk (unitless)
			Adult Resident	Child Resident	Adult & Child
Trihalomethanes					
Chloroform	NE	2.3E-05	NE	NE	NE
Chlorinated VOCs					
1,1,1-Trichloroethane	3.3E+00	NA	9.0E-01	2.7E-01	NA
1,2-Dichloroethane	3.6E-02	2.6E-05	9.9E-03	3.0E-03	3.E-07
1,4-Dichlorobenzene	2.1E-01	1.1E-05	5.8E-02	1.7E-02	8.E-07
Chlorobenzene	4.5E-01	NA	1.2E-01	3.7E-02	NA
Freons	1.4E+00	NA	3.9E-01	1.2E-01	NA
Trichloroethene	1.4E-01	4.1E-06	3.9E-02	1.2E-02	2.E-07
Vinyl Chloride	9.0E-03	7.8E-05	2.5E-03	7.4E-04	3.E-07
Petroleum Hydrocarbons					
1,2,4-Trimethylbenzene	1.1E+00	NA	3.0E-01	8.9E-02	NA
1,3,5-Trimethylbenzene	8.4E-01	NA	2.3E-01	6.9E-02	NA
2-Butanone	4.2E-01	NA	1.2E-01	3.5E-02	NA
2,2,4-Trimethylpentane	5.1E-01	NA	1.4E-01	4.2E-02	NA
Acetone	2.2E+00	NA	5.9E-01	1.8E-01	NA
Benzene	5.1E-01	2.9E-05	1.4E-01	4.2E-02	5.E-06
Carbon Disulfide	5.4E-01	NA	1.5E-01	4.4E-02	NA
Cumenes	2.3E+00	NA	6.2E-01	1.8E-01	NA
Ethylbenzene	8.1E+00	2.5E-06	2.2E+00	6.7E-01	7.E-06
Hexanes	5.6E+01	NA	1.5E+01	4.6E+00	NA
Naphthalene	2.2E-01	3.4E-05	5.9E-02	1.8E-02	3.E-06
Propylbenzene	3.6E-01	NA	9.9E-02	3.0E-02	NA
Styrene	4.2E-01	NA	1.2E-01	3.5E-02	NA
Toluene	1.1E+00	NA	3.1E-01	9.4E-02	NA
Xylenes, total	6.2E+00	NA	1.7E+00	5.1E-01	NA
TPH-g	1.6E+03	NA	4.4E+02	1.3E+02	NA
Total Cancer Risk					**2.E-05**

Notes:
ug/m^3 = micrograms per cubic meter
COPC = chemical of potential concern
NA = Not applicable or not available
NE = Not evaluated

APPENDIX A

Health Hazards and Cancer Risk Supporting Calculations – School Exposure Scenario

HHRA Appendix A, Table A-1
Health Hazards from Incidental Soil Ingestion - School Exposure Scenario

COPC	Exposure Point Concentration (mg/kg)	Oral Reference Dose (mg/kg-d)	School Exposure Scenario			
			Average Daily Intake (mg/kg-d)		Hazard Quotient (Unitless)	
			Staff	Student	Staff	Student
Metals						
Antimony	4	4.0E-04	3.4E-06	4.1E-06	8.6E-03	1.0E-02
Barium	240	2.0E-01	2.1E-04	2.5E-04	1.0E-03	1.2E-03
Beryllium	0.72	2.0E-04	6.2E-07	7.4E-07	3.1E-03	3.7E-03
Cadmium	0.78	1.0E-04	6.7E-07	8.0E-07	6.7E-03	8.0E-03
Chromium (III)	79	1.5E+00	6.8E-05	8.1E-05	4.5E-05	5.4E-05
Chromium (VI)	1.3	9.0E-04	1.1E-06	1.3E-06	1.2E-03	1.5E-03
Cobalt	20	3.0E-04	1.7E-05	2.1E-05	5.7E-02	6.9E-02
Copper	94	4.0E-02	8.0E-05	9.7E-05	2.0E-03	2.4E-03
Nickel	96	1.1E-02	8.2E-05	9.9E-05	7.5E-03	9.0E-03
Mercury	1.7	1.6E-04	1.5E-06	1.8E-06	9.1E-03	1.1E-02
Molybdenum	1.6	5.0E-03	1.4E-06	1.6E-06	2.7E-04	3.3E-04
Silver	21	5.0E-03	1.8E-05	2.2E-05	3.6E-03	4.3E-03
Vanadium	54	5.0E-03	4.6E-05	5.6E-05	9.2E-03	1.1E-02
Zinc	1600	3.0E-01	1.4E-03	1.6E-03	4.6E-03	5.5E-03
Pesticides						
4,4'-DDT	0.015	5.0E-04	1.3E-08	1.5E-08	2.6E-05	3.1E-05
Dioxins						
Total Dioxins*	0.0000303	7.0E-10	2.6E-11	3.1E-11	3.7E-02	4.5E-02
TPH						
TPH (C9-C18 aliphatic medium)	120	1.9E-02	1.0E-04	1.2E-04	5.4E-03	6.5E-03
TPH (C19-C32 aliphatic high)	420	1.5E-01	3.6E-04	4.3E-04	2.4E-03	2.9E-03
Total Hazard Index					**1.6E-01**	**1.9E-01**

Notes:

NA = not applicable or not available

* = Toxicity data for 2,3,7,8-TCDD

Equations:

$$Construction\ Worker\ Intake_{Noncancer}\left(\frac{mg}{kg}day\right) = \frac{CS \times IR_{iw} \times FE \times EF_{iw} \times ED_{iw} \times CF}{BW_{iw} \times AT_{noncancer}}$$

$$Non-Intrusive\ Worker\ Intake_{Noncancer}\left(\frac{mg}{kg}day\right) = \frac{CS \times IR_{Scw} \times FE \times EF_{cw} \times ED_{cw} \times CF}{BW_{cw} \times AT_{noncancer}}$$

$$Noncancer\ Hazard = \frac{Intake_{noncancer}}{RfD}$$

HHRA Appendix A, Table A-2
Health Hazards from Dermal Contact with Soil - School Exposure Scenario

COPC	Exposure Point Concentration (mg/kg)	Soil-to-Skin Absorption Factor (unitless)	Oral/Dermal Reference Dose (mg/kg-d)	School Exposure Scenario			
				Average Daily Intake (mg/kg-d)	Average Daily Intake (mg/kg-d)	Hazard Quotient (unitless)	
				Staff	Student	Staff	Student
Metals							
Antimony	4	0.01	4.0E-04	4.1E-07	7.8E-07	1.0E-03	2.0E-03
Barium	240	0.01	2.0E-01	2.5E-05	4.7E-05	1.2E-04	2.3E-04
Beryllium	0.72	0.01	2.0E-04	7.4E-08	1.4E-07	3.7E-04	7.0E-04
Cadmium	0.78	0.001	1.0E-04	8.1E-09	1.5E-08	8.1E-05	1.5E-04
Chromium (III)	79	0.01	1.5E+00	8.2E-06	1.5E-05	5.4E-06	1.0E-05
Chromium (VI)	1.3	0.01	9.0E-04	1.3E-07	2.5E-07	1.5E-04	2.8E-04
Cobalt	20	0.01	3.0E-04	2.1E-06	3.9E-06	6.9E-03	1.3E-02
Copper	94	0.01	4.0E-02	9.7E-06	1.8E-05	2.4E-04	4.6E-04
Nickel	96	0.01	1.1E-02	9.9E-06	1.9E-05	9.0E-04	1.7E-03
Mercury	1.7	0.01	1.6E-04	1.8E-07	3.3E-07	1.1E-03	2.1E-03
Molybdenum	1.6	0.01	5.0E-03	1.7E-07	3.1E-07	3.3E-05	6.3E-05
Silver	21	0.01	5.0E-03	2.2E-06	4.1E-06	4.3E-04	8.2E-04
Vanadium	54	0.01	5.0E-03	5.6E-06	1.1E-05	1.1E-03	2.1E-03
Zinc	1600	0.01	3.0E-01	1.7E-04	3.1E-04	5.5E-04	1.0E-03
Pesticides							
4,4'-DDT	0.015	0.05	5.0E-04	7.7E-09	1.5E-08	1.5E-05	2.9E-05
Dioxins							
Total Dioxins*	0.0000303	0.15	7.0E-10	4.7E-11	8.9E-11	6.7E-02	1.3E-01
TPH							
TPH (C9-C18 aliphatic medium)	120	0.1	1.9E-02	1.2E-04	2.3E-04	6.5E-03	1.2E-02
TPH (C19-C32 aliphatic high)	420	0.1	1.5E-01	4.3E-04	8.2E-04	2.9E-03	5.5E-03
Total Hazard Index						**9.0E-02**	**1.7E-01**

Notes:

NA = not applicable or not available

* = Toxicity data for 2,3,7,8-TCDD

Equations:

$$Construction\ Worker\ Intake_{Noncancer}\left(\frac{mg}{kg}day\right) = \frac{CS \times SA_{iw} \times AF_{iw} \times ABS \times FE \times EF_{iw} \times ED_{iw} \times CF}{BW_{iw} \times AT_{noncancer}}$$

$$Non-Intrusive\ Worker\ Intake_{Noncancer}\left(\frac{mg}{kg}day\right) = \frac{CS \times SA_{cw} \times AF_{cw} \times ABS \times FE \times EF_{cw} \times ED_{cw} \times CF}{BW_{cw} \times AT_{noncancer}}$$

$$Noncancer\ Hazard = \frac{Intake_{noncancer}}{RfD}$$

HHRA Appendix A, Table A-3
Health Hazards from Inhalation of Outdoor Air - School Exposure Scenario

COPC	Exposure Point Concentration (mg/kg)	Inhalation Reference Concentration (ug/m^3)	School Exposure Scenario			
			Average Daily Intake (mg/kg-d)	Average Daily Intake (mg/kg-d)	Hazard Quotient (unitless)	
			Staff	Student	Staff	Student
Metals						
Antimony	4	3.0E-01	6.9E-07	3.7E-07	2.3E-06	1.2E-06
Barium	240	5.0E-01	4.2E-05	2.2E-05	8.3E-05	4.5E-05
Beryllium	0.72	7.0E-03	1.2E-07	6.7E-08	1.8E-05	9.6E-06
Cadmium	0.78	1.0E-02	1.4E-07	7.3E-08	1.4E-05	7.3E-06
Chromium (III)	79	NA	1.4E-05	7.4E-06	NA	NA
Chromium (VI)	1.3	3.0E-02	2.3E-07	1.2E-07	7.5E-06	4.1E-06
Cobalt	20	6.0E-03	3.5E-06	1.9E-06	5.8E-04	3.1E-04
Copper	94	NA	1.6E-05	8.8E-06	NA	NA
Nickel	96	1.4E-02	1.7E-05	9.0E-06	1.2E-03	6.4E-04
Mercury	1.7	3.0E-02	2.9E-07	1.6E-07	9.8E-06	5.3E-06
Molybdenum	1.6	2.0E+00	2.8E-07	1.5E-07	1.4E-07	7.5E-08
Silver	21	NA	3.6E-06	2.0E-06	NA	NA
Vanadium	54	1.0E-01	9.4E-06	5.1E-06	9.4E-05	5.1E-05
Zinc	1600	NA	2.8E-04	1.5E-04	NA	NA
Pesticides						
4,4'-DDT	0.015	NA	2.6E-09	1.4E-09	NA	NA
Dioxins						
Total Dioxins*	0.0000303	4.0E-05	5.3E-12	2.8E-12	1.3E-07	7.1E-08
TPH						
TPH (C9-C18 aliphatic medium)	120	1.9E+02	2.1E-05	1.1E-05	1.1E-07	5.9E-08
TPH (C19-C32 aliphatic high)	420	NA	7.3E-05	3.9E-05	NA	NA
Total Hazard Index					**2.0E-03**	**1.1E-03**

Notes:

NA = not applicable or not available

* = Toxicity data for 2,3,7,8-TCDD

Intake Equations:

$$Intake\ (\frac{ug}{m3}) = \frac{CS \times ET \times EF \times ED}{VF \times AT_{noncancer}}$$

$$Noncancer\ Hazard = \frac{Intake_{noncancer}}{RfC}$$

HHRA Appendix A, Table A-4
Cumulative Health Hazards from Multipathway Soil Exposure - School Exposure Scenario

COPC	Exposure Point Conc. (mg/kg)	School Exposure Scenario							
		School Staff				School Student			
		Ingestion	Dermal	Inhalation	Total HI	Ingestion	Dermal	Inhalation	Total HI
Metals									
Antimony	4	8.6E-03	1.0E-03	2.3E-06	9.6E-03	1.0E-02	2.0E-03	1.2E-06	1.2E-02
Barium	240	1.0E-03	1.2E-04	8.3E-05	1.2E-03	1.2E-03	2.3E-04	4.5E-05	1.5E-03
Beryllium	0.72	3.1E-03	3.7E-04	1.8E-05	3.5E-03	3.7E-03	7.0E-04	9.6E-06	4.4E-03
Cadmium	0.78	6.7E-03	8.1E-05	1.4E-05	6.8E-03	8.0E-03	1.5E-04	7.3E-06	8.2E-03
Chromium (III)	79	4.5E-05	5.4E-06	NA	5.1E-05	5.4E-05	1.0E-05	NA	6.5E-05
Chromium (VI)	1.3	1.2E-03	1.5E-04	7.5E-06	1.4E-03	1.5E-03	2.8E-04	4.1E-06	1.8E-03
Cobalt	20	5.7E-02	6.9E-03	5.8E-04	6.5E-02	6.9E-02	1.3E-02	3.1E-04	8.2E-02
Copper	94	2.0E-03	2.4E-04	NA	2.3E-03	2.4E-03	4.6E-04	NA	2.9E-03
Nickel	96	7.5E-03	9.0E-04	1.2E-03	9.6E-03	9.0E-03	1.7E-03	6.4E-04	1.1E-02
Mercury	1.7	9.1E-03	1.1E-03	9.8E-06	1.0E-02	1.1E-02	2.1E-03	5.3E-06	1.3E-02
Molybdenum	1.6	2.7E-04	3.3E-05	1.4E-07	3.1E-04	3.3E-04	6.3E-05	7.5E-08	3.9E-04
Silver	21	3.6E-03	4.3E-04	NA	4.0E-03	4.3E-03	8.2E-04	NA	5.1E-03
Vanadium	54	9.2E-03	1.1E-03	9.4E-05	1.0E-02	1.1E-02	2.1E-03	5.1E-05	1.3E-02
Zinc	1600	4.6E-03	5.5E-04	NA	5.1E-03	5.5E-03	1.0E-03	NA	6.5E-03
Pesticides									
4,4'-DDT	0.015	2.6E-05	1.5E-05	NA	4.1E-05	3.1E-05	2.9E-05	NA	6.0E-05
Dioxins									
Total Dioxins*	0.0000303	3.7E-02	6.7E-02	1.3E-07	1.0E-01	4.5E-02	1.3E-01	7.1E-08	1.7E-01
TPH									
TPH (C9-C18 aliphatic medium)	120	5.4E-03	6.5E-03	1.1E-07	1.2E-02	6.5E-03	1.2E-02	5.9E-08	1.9E-02
TPH (C19-C32 aliphatic high)	420	2.4E-03	2.9E-03	NA	5.3E-03	2.9E-03	5.5E-03	NA	8.4E-03
Total Hazard Index					**3.E-01**				**4.E-01**

Notes:
NA = not applicable or not available
* = Toxicity data for 2,3,7,8-TCDD

HHRA Appendix A, Table A-5
Cancer Risks from Incidental Soil Ingestion - School Exposure Scenario

COPC	Exposure Point Concentration (mg/kg)	Oral Slope Factor $(mg/kg\text{-}d)^{-1}$	School Exposure Scenario			
			Average Daily Intake (mg/kg-d)		Cancer Risk (Unitless)	
			Staff	Student	Staff	Student
Metals						
Antimony	4	NA	1.2E-06	1.8E-07	NA	NA
Barium	240	NA	7.3E-05	1.1E-05	NA	NA
Beryllium	0.72	NA	2.2E-07	3.2E-08	NA	NA
Cadmium	0.78	NA	2.4E-07	3.4E-08	NA	NA
Chromium (III)	79	NA	2.4E-05	3.5E-06	NA	NA
Chromium (VI)	1.3	5.0E-01	4.0E-07	5.7E-08	2.0E-07	2.9E-08
Cobalt	20	NA	6.1E-06	8.8E-07	NA	NA
Copper	94	NA	2.9E-05	4.1E-06	NA	NA
Nickel	96	NA	2.9E-05	4.2E-06	NA	NA
Mercury	1.7	NA	5.2E-07	7.5E-08	NA	NA
Molybdenum	1.6	NA	4.9E-07	7.1E-08	NA	NA
Silver	21	NA	6.4E-06	9.3E-07	NA	NA
Vanadium	54	NA	1.7E-05	2.4E-06	NA	NA
Zinc	1600	NA	4.9E-04	7.1E-05	NA	NA
Pesticides						
4,4'-DDT	0.015	3.4E-01	4.6E-09	6.6E-10	1.6E-09	2.3E-10
Dioxins						
Total Dioxins*	0.0000303	1.3E+05	9.3E-12	1.3E-12	1.2E-06	1.7E-07
TPH						
TPH (C9-C18 aliphatic medium)	120	NA	3.7E-05	5.3E-06	NA	NA
TPH (C19-C32 aliphatic high)	420	NA	1.3E-04	1.9E-05	NA	NA
Total Cancer Risk					**1.E-06**	**2.E-07**

Notes:
NA = not applicable or not available
* = Toxicity data for 2,3,7,8-TCDD
Equations:

$$Construction\ Worker\ Intake_{cancer}\left(\frac{mg}{kg}day\right) = \frac{CS \times IR{\sim}S_{iw} \times FE \times EF_{iw} \times ED_{iw} \times CF}{BW_{iw} \times AT_{cancer}}$$

$$Non-Intrusive\ Worker\ Intake_{cancer}\left(\frac{mg}{kg}day\right) = \frac{CS \times IR_{Scw} \times FE \times EF_{cw} \times ED_{cw} \times CF}{BW_{cw} \times AT_{cancer}}$$

$$Cancer\ Risk = Intake_{cancer} \times CSF$$

HHRA Appendix A, Table A-6
Cancer Risks from Dermal Contact with Soil - School Exposure Scenario

COPC	Exposure Point Concentration (mg/kg)	Soil-to-Skin Absorption Factor (unitless)	Oral/Dermal Slope Factor $(mg/kg\text{-}d)^{-1}$	School Exposure Scenario			
				Average Daily Intake (mg/kg-d)		Cancer Risk (Unitless)	
				Staff	Student	Staff	Student
Metals							
Antimony	4	0.01	NA	1.5E-07	3.4E-08	NA	NA
Barium	240	0.01	NA	8.9E-06	2.0E-06	NA	NA
Beryllium	0.72	0.01	NA	2.7E-08	6.0E-09	NA	NA
Cadmium	0.78	0.001	NA	2.9E-09	6.5E-10	NA	NA
Chromium (III)	79	0.01	NA	2.9E-06	6.6E-07	NA	NA
Chromium (VI)	1.3	0.01	5.0E-01	4.8E-08	1.1E-08	2.4E-08	5.4E-09
Cobalt	20	0.01	NA	7.4E-07	1.7E-07	NA	NA
Copper	94	0.01	NA	3.5E-06	7.9E-07	NA	NA
Nickel	96	0.01	NA	3.5E-06	8.0E-07	NA	NA
Mercury	1.7	0.01	NA	6.3E-08	1.4E-08	NA	NA
Molybdenum	1.6	0.01	NA	5.9E-08	1.3E-08	NA	NA
Silver	21	0.01	NA	7.7E-07	1.8E-07	NA	NA
Vanadium	54	0.01	NA	2.0E-06	4.5E-07	NA	NA
Zinc	1600	0.01	NA	5.9E-05	1.3E-05	NA	NA
Pesticides							
4,4'-DDT	0.015	0.05	3.4E-01	2.8E-09	6.3E-10	9.4E-10	2.1E-10
Dioxins							
Total Dioxins*	0.0000303	0.15	1.3E+05	1.7E-11	3.8E-12	2.2E-06	4.9E-07
TPH							
TPH (C9-C18 aliphatic medium)	120	0.1	NA	4.4E-05	1.0E-05	NA	NA
TPH (C19-C32 aliphatic high)	420	0.1	NA	1.5E-04	3.5E-05	NA	NA
Total Cancer Risk						**2.2E-06**	**5.0E-07**

Notes:

NA = not applicable or not available

* = Toxicity data for 2,3,7,8-TCDD

Equations:

$$Construction\ Worker\ Intake_{cancer}\left(\frac{mg}{kg}day\right) = \frac{CS \times SA_{iw} \times AF_{iw} \times ABS \times FE \times EF_{iw} \times ED_{iw} \times CF}{BW_{iw} \times AT_{cancer}}$$

$$Non-Intrusive\ Worker\ Intake_{cancer}\left(\frac{mg}{kg}day\right) = \frac{CS \times SA_{cw} \times AF_{cw} \times ABS \times FE \times EF_{cw} \times ED_{cw} \times CF}{BW_{cw} \times AT_{cancer}}$$

$$Cancer\ Risk = Intake_{cancer} \times CSF$$

HHRA Appendix A, Table A-7
Cancer Risks from Inhalation of Outdoor Air - School Exposure Scenario

COPC	Exposure Point Concentration (mg/kg)	Inhalation Unit Risk $(ug/m^3)^{-1}$	School Exposure Scenario			
			Average Daily Intake (ug/m^3)		Cancer Risk (Unitless)	
			Staff	Student	Staff	Student
Metals						
Antimony	4	NA	2.5E-07	1.6E-08	NA	NA
Barium	240	NA	1.5E-05	9.6E-07	NA	NA
Beryllium	0.72	2.4E-03	4.5E-08	2.9E-09	1.1E-10	6.9E-12
Cadmium	0.78	4.2E-03	4.8E-08	3.1E-09	2.0E-10	1.3E-11
Chromium (III)	79	NA	4.9E-06	3.2E-07	NA	NA
Chromium (VI)	1.3	1.5E-01	8.1E-08	5.2E-09	1.2E-08	7.8E-10
Cobalt	20	9.0E-03	1.2E-06	8.0E-08	1.1E-08	7.2E-10
Copper	94	NA	5.8E-06	3.8E-07	NA	NA
Nickel	96	2.6E-04	5.9E-06	3.9E-07	1.5E-09	1.0E-10
Mercury	1.7	NA	1.1E-07	6.8E-09	NA	NA
Molybdenum	1.6	NA	9.9E-08	6.4E-09	NA	NA
Silver	21	NA	1.3E-06	8.4E-08	NA	NA
Vanadium	54	NA	3.3E-06	2.2E-07	NA	NA
Zinc	1600	NA	9.9E-05	6.4E-06	NA	NA
Pesticides						
4,4'-DDT	0.015	9.7E-05	9.3E-10	6.0E-11	9.0E-14	5.8E-15
Dioxins						
Total Dioxins*	0.0000303	3.8E+01	1.9E-12	1.2E-13	7.1E-11	4.6E-12
TPH						
TPH (C9-C18 aliphatic medium)	120	NA	7.4E-06	4.8E-07	NA	NA
TPH (C19-C32 aliphatic high)	420	NA	2.6E-05	1.7E-06	NA	NA
Total Cancer Risk					**2.5E-08**	**1.6E-09**

Notes:
NA = not applicable or not available
* = Toxicity data for 2,3,7,8-TCDD
Equations:

$$VOC\ Exposure\ Concentration\ (\frac{ug}{m^3}) = \frac{CS \times EF \times ED \times ET}{VF \times AT_c}$$

$$Intake_{cancer}\left(\frac{mg}{kg}day\right) = \frac{CS \times EF_{iw} \times ED_{iw} \times \frac{1}{PEF} \times IR{\sim}A_{iw}}{BW_{iw} \times AT_{cancer}}$$

$$Cancer\ Risk = Intake_{cancer} \times CSF$$

$$Intake_{cancer}\left(\frac{mg}{kg}day\right) = \frac{CS \times EF_{cw} \times ED_{cw} \times \frac{1}{PEF} \times IR{\sim}A_{cw}}{BW_{cw} \times AT_{cancer}}$$

HHRA Appendix A, Table A-8
Cumulative Cancer Risks from Multipathway Soil Exposure - School Exposure Scenario

COPC	Exposure Point Conc. (mg/kg)	School Exposure Scenario							
		School Staff				School Student			
		Ingestion	Dermal	Inhalation	Total Risk	Ingestion	Dermal	Inhalation	Total Risk
Metals									
Antimony	4	NA	NA	NA	--	NA	NA	NA	--
Barium	240	NA	NA	NA	--	NA	NA	NA	--
Beryllium	0.72	NA	NA	1.1E-10	1.1E-10	NA	NA	6.9E-12	6.9E-12
Cadmium	0.78	NA	NA	2.0E-10	2.0E-10	NA	NA	1.3E-11	1.3E-11
Chromium (III)	79	NA	NA	NA	--	NA	NA	NA	--
Chromium (VI)	1.3	2.0E-07	2.4E-08	1.2E-08	2.3E-07	2.9E-08	5.4E-09	7.8E-10	3.5E-08
Cobalt	20	NA	NA	1.1E-08	1.1E-08	NA	NA	7.2E-10	7.2E-10
Copper	94	NA	NA	NA	--	NA	NA	NA	--
Nickel	96	NA	NA	1.5E-09	1.5E-09	NA	NA	1.0E-10	1.0E-10
Mercury	1.7	NA	NA	NA	--	NA	NA	NA	--
Molybdenum	1.6	NA	NA	NA	--	NA	NA	NA	--
Silver	21	NA	NA	NA	--	NA	NA	NA	--
Vanadium	54	NA	NA	NA	--	NA	NA	NA	--
Zinc	1600	NA	NA	NA	--	NA	NA	NA	--
Pesticides									
4,4'-DDT	0.015	1.6E-09	9.4E-10	9.0E-14	2.5E-09	2.3E-10	2.1E-10	5.8E-15	4.4E-10
Dioxins									
Total Dioxins*	0.0000303	1.2E-06	2.2E-06	7.1E-11	3.4E-06	1.7E-07	4.9E-07	4.6E-12	6.7E-07
TPH									
TPH (C9-C18 aliphatic medium)	120	NA	NA	NA	--	NA	NA	NA	--
TPH (C19-C32 aliphatic high)	420	NA	NA	NA	--	NA	NA	NA	--
Total Cancer Risk					**4.E-06**				**7.E-07**

Note:
NA = not applicable or not available

APPENDIX B

Health Hazards and Cancer Risk Supporting Calculations – Hypothetical Residential Exposure Scenario

HHRA Appendix B, Table B-1
Health Hazards from Incidental Soil Ingestion - Residential Exposure Scenario

COPC	Maximum Soil Concentration (mg/kg)	Oral Reference Dose (mg/kg-d)	Residential Scenario	
			Average Daily Intake (mg/kg-d)	Hazard Quotient (Unitless)
			Child	Child
Metals				
Antimony	290	4.0E-04	3.71E-03	9.27E+00
Barium	4900	2.0E-01	6.26E-02	3.13E-01
Beryllium	1.1	2.0E-04	1.41E-05	7.03E-02
Cadmium	180	1.0E-04	2.30E-03	2.30E+01
Chromium (VI)	1.7	9.0E-04	2.17E-05	2.42E-02
Cobalt	82	3.0E-04	1.05E-03	3.49E+00
Copper	6400	4.0E-02	8.18E-02	2.05E+00
Nickel	490	1.1E-02	6.26E-03	5.70E-01
Mercury	15	1.6E-04	1.92E-04	1.20E+00
Molybdenum	29	5.0E-03	3.71E-04	7.42E-02
Selenium	9.8	5.0E-03	1.25E-04	2.51E-02
Silver	21	5.0E-03	2.68E-04	5.37E-02
Thallium	16	1.0E-05	2.05E-04	2.05E+01
Vanadium	190	5.0E-03	2.43E-03	4.86E-01
Zinc	13000	3.0E-01	1.66E-01	5.54E-01
Pesticides				
4,4'-DDT	0.015	5.0E-04	1.92E-07	3.84E-04
4,4'-DDD	0.014	5.0E-04	1.79E-07	3.58E-04
Chlordane	0.3	5.0E-04	3.84E-06	7.67E-03
PCBs				
Aroclor-1248	0.14	NA	1.79E-06	NA
Aroclor-1260	0.098	NA	1.25E-06	NA
Aroclor-1268	0.071	NA	9.08E-07	NA
SVOCs				
1-Methylnaphthalene	0.39	7.0E-02	4.99E-06	7.12E-05
2-Methylnaphthalene	0.23	4.0E-03	2.94E-06	7.35E-04
Naphthalene	0.2	2.0E-02	2.56E-06	1.28E-04
Acenaphthylene	0.38	6.0E-02	4.86E-06	8.10E-05
Acenaphthene	0	6.0E-02	0.00E+00	0.00E+00
Fluorene	0.11	4.0E-02	1.41E-06	3.52E-05
Phenanthrene	0.61	4.0E-02	7.80E-06	1.95E-04
Anthracene	0.026	3.0E-01	3.32E-07	1.11E-06
Fluoranthene	1.1	4.0E-02	1.41E-05	3.52E-04
Pyrene	1.9	3.0E-02	2.43E-05	8.10E-04
Benzo[a]anthracene	0.57	NA	7.29E-06	NA
Chrysene	0.92	NA	1.18E-05	NA
Benzo[b]fluoroanthene	1.6	NA	2.05E-05	NA
Benzo[k]fluoroanthene	0.54	NA	6.90E-06	NA
Benzo[a]pyrene	1.7	3.0E-04	2.17E-05	7.25E-02
Indeno[1,2,3-cd]pyrene	1.1	NA	1.41E-05	NA
Dibenz[a,h]anthracene	0.21	NA	2.68E-06	NA
Dioxins				
Total Dioxins*	0.000147	7.0E-10	1.88E-09	2.68E+00
TPH				
TPH (C5-C8 aliphatic low)	1700	3.9E-02	2.17E-02	5.57E-01
TPH (C9-C18 aliphatic medium)	3200	1.9E-02	4.09E-02	2.15E+00
TPH (C19-C32 aliphatic high)	6000	1.5E-01	7.67E-02	5.11E-01
Total Hazard Index				**6.8E+01**

Notes:

NA = not applicable or not available

* = Toxicity data for 2,3,7,8-TCDD

Equations:

$$Child\ Intake_{Noncancer}\left(\frac{mg}{kg}day\right) = \frac{CS_{residential} \times IR{\sim}S_{child} \times EF_{child} \times ED_{child} \times CF}{BW_{child} \times AT_{noncancer}}$$

$$Noncancer\ Hazard = \frac{Intake_{noncancer}}{RfD}$$

HHRA Appendix B, Table B-2
Health Hazards from Dermal Contact with Soil - Residential Exposure Scenario

COPC	Maximum Soil Concentration (mg/kg)	Soil-to-Skin Absorption Factor (unitless)	Oral/Dermal Reference Dose (mg/kg-d)	Residential Scenario	
				Average Daily Intake (mg/kg-d)	Hazard Quotient (Unitless)
				Child	Child
Metals					
Antimony	290	0.01	4.0E-04	8.80E-05	2.20E-01
Barium	4900	0.01	2.0E-01	1.49E-03	7.43E-03
Beryllium	1.1	0.01	2.0E-04	3.34E-07	1.67E-03
Cadmium	180	0.001	1.0E-04	5.46E-06	5.46E-02
Chromium (VI)	1.7	0.01	9.0E-04	5.16E-07	5.73E-04
Cobalt	82	0.01	3.0E-04	2.49E-05	8.29E-02
Copper	6400	0.01	4.0E-02	1.94E-03	4.85E-02
Nickel	490	0.01	1.1E-02	1.49E-04	1.35E-02
Mercury	15	0.01	1.6E-04	4.55E-06	2.84E-02
Molybdenum	29	0.01	5.0E-03	8.80E-06	1.76E-03
Selenium	9.8	0.01	5.0E-03	2.97E-06	5.95E-04
Silver	21	0.01	5.0E-03	6.37E-06	1.27E-03
Thallium	16	0.01	1.0E-05	4.85E-06	4.85E-01
Vanadium	190	0.01	5.0E-03	5.76E-05	1.15E-02
Zinc	13000	0.01	3.0E-01	3.94E-03	1.31E-02
Pesticides					
4,4'-DDT	0.015	0.05	5.0E-04	2.28E-08	4.55E-05
4,4'-DDD	0.014	0.05	5.0E-04	2.12E-08	4.25E-05
Chlordane	0.3	0.05	5.0E-04	4.55E-07	9.10E-04
PCBs					
Aroclor-1248	0.14	0.15	NA	6.37E-07	NA
Aroclor-1260	0.098	0.15	NA	4.46E-07	NA
Aroclor-1268	0.071	0.15	NA	3.23E-07	NA
SVOCs					
1-Methylnaphthalene	0.39	0.15	7.0E-02	1.77E-06	2.54E-05
2-Methylnaphthalene	0.23	0.15	4.0E-03	1.05E-06	2.62E-04
Naphthalene	0.2	0.15	2.0E-02	9.10E-07	4.55E-05
Acenaphthylene	0.38	0.15	6.0E-02	1.73E-06	2.88E-05
Acenaphthene	0	0.15	6.0E-02	0.00E+00	0.00E+00
Fluorene	0.11	0.15	4.0E-02	5.01E-07	1.25E-05
Phenanthrene	0.61	0.15	4.0E-02	2.78E-06	6.94E-05
Anthracene	0.026	0.15	3.0E-01	1.18E-07	3.94E-07
Fluoranthene	1.1	0.15	4.0E-02	5.01E-06	1.25E-04
Pyrene	1.9	0.15	3.0E-02	8.65E-06	2.88E-04
Benzo[a]anthracene	0.57	0.15	NA	2.59E-06	NA
Chrysene	0.92	0.15	NA	4.19E-06	NA
Benzo[b]fluoroanthene	1.6	0.15	NA	7.28E-06	NA
Benzo[k]fluoroanthene	0.54	0.15	NA	2.46E-06	NA
Benzo[a]pyrene	1.7	0.15	3.0E-04	7.74E-06	2.58E-02
Indeno[1,2,3-cd]pyrene	1.1	0.15	NA	5.01E-06	NA
Dibenz[a,h]anthracene	0.21	0.15	NA	9.56E-07	NA
Dioxins					
Total Dioxins*	0.000147	0.03	7.0E-10	1.34E-10	1.91E-01
TPH					
TPH (C5-C8 aliphatic low)	1700	0.1	3.9E-02	5.16E-03	1.32E-01
TPH (C9-C18 aliphatic medium)	3200	0.1	1.9E-02	9.71E-03	5.11E-01
TPH (C19-C32 aliphatic high)	6000	0.1	1.5E-01	1.82E-02	1.21E-01
Total Hazard Index					**2.0E+00**

Notes:

NA = not applicable or not available

* = Toxicity data for 2,3,7,8-TCDD

Equations:

$$Child\ Intake_{Noncancer}\left(\frac{mg}{kg}day\right) = \frac{CS_{residential} \times SA_{child} \times AF_{child} \times ABS \times EF_{child} \times ED_{child} \times CF}{BW_{child} \times AT_{noncancer}}$$

$$Noncancer\ Hazard = \frac{Intake_{noncancer}}{RfD}$$

HHRA Appendix B, Table B-3
Health Hazards from Inhalation of Outdoor Air - Residential Exposure Scenario

COPC	Maximum Soil Concentration (mg/kg)	PEF or VEF (m^3/kg)	Inhalation Reference Concentration (ug/m^3)	Residential Scenario	
				Exposure Concentration (ug/m^3)	Hazard Quotient (Unitless)
				Child	Child
Metals					
Antimony	290	1.36E+09	3.0E-01	2.04E-04	6.82E-04
Barium	4900	1.36E+09	5.0E-01	3.45E-03	6.91E-03
Beryllium	1.1	1.36E+09	7.0E-03	7.76E-07	1.11E-04
Cadmium	180	1.36E+09	1.0E-02	1.27E-04	1.27E-02
Chromium (VI)	1.7	1.36E+09	3.0E-02	1.20E-06	4.00E-05
Cobalt	82	1.36E+09	6.0E-03	5.78E-05	9.64E-03
Copper	6400	1.36E+09	NA	4.51E-03	NA
Nickel	490	1.36E+09	1.4E-02	3.45E-04	2.47E-02
Mercury	15	1.36E+09	3.0E-02	1.06E-05	3.53E-04
Molybdenum	29	1.36E+09	2.0E+00	2.04E-05	1.02E-05
Selenium	9.8	1.36E+09	2.0E+01	6.91E-06	3.45E-07
Silver	21	1.36E+09	NA	1.48E-05	NA
Thallium	16	1.36E+09	NA	1.13E-05	NA
Vanadium	190	1.36E+09	1.0E-01	1.34E-04	1.34E-03
Zinc	13000	1.36E+09	NA	9.17E-03	NA
Pesticides					
4,4'-DDT	0.015	1.36E+09	NA	1.06E-08	NA
4,4'-DDD	0.014	1.36E+09	NA	9.87E-09	NA
Chlordane	0.3	1.36E+09	7.0E-01	2.12E-07	3.02E-07
PCBs					
Aroclor-1248	0.14	1.36E+09	NA	9.87E-08	NA
Aroclor-1260	0.098	1.36E+09	NA	6.91E-08	NA
Aroclor-1268	0.071	1.36E+09	NA	5.01E-08	NA
SVOCs					
1-Methylnaphthalene	0.39	1.36E+09	3.0E-03	2.75E-07	9.17E-05
2-Methylnaphthalene	0.23	1.36E+09	1.6E+01	1.62E-07	1.01E-08
Naphthalene	0.2	1.36E+09	3.0E+00	1.41E-07	4.70E-08
Acenaphthylene	0.38	1.36E+09	2.4E+02	2.68E-07	1.12E-09
Acenaphthene	0	1.36E+09	2.4E+02	0.00E+00	0.00E+00
Fluorene	0.11	1.36E+09	1.6E+02	7.76E-08	4.85E-10
Phenanthrene	0.61	1.36E+09	1.6E+02	4.30E-07	2.69E-09
Anthracene	0.026	1.36E+09	1.2E+03	1.83E-08	1.53E-11
Fluoranthene	1.1	1.36E+09	NA	7.76E-07	NA
Pyrene	1.9	1.36E+09	1.2E+02	1.34E-06	1.12E-08
Benzo[a]anthracene	0.57	1.36E+09	NA	4.02E-07	NA
Chrysene	0.92	1.36E+09	NA	6.49E-07	NA
Benzo[b]fluoroanthene	1.6	1.36E+09	NA	1.13E-06	NA
Benzo[k]fluoroanthene	0.54	1.36E+09	NA	3.81E-07	NA
Benzo[a]pyrene	1.7	1.36E+09	2.0E-03	1.20E-06	5.99E-04
Indeno[1,2,3-cd]pyrene	1.1	1.36E+09	NA	7.76E-07	NA
Dibenz[a,h]anthracene	0.21	1.36E+09	NA	1.48E-07	NA
Dioxins					
Total Dioxins*	0.000147	1.36E+09	4.0E-05	1.04E-10	2.59E-06
TPH					
TPH (C5-C8 aliphatic low)	1700	1.36E+09	6.2E+02	1.20E-03	1.93E-06
TPH (C9-C18 aliphatic medium)	3200	1.36E+09	1.9E+02	2.26E-03	1.19E-05
TPH (C19-C32 aliphatic high)	6000	1.36E+09	NA	4.23E-03	NA
Total Hazard Index					**5.7E-02**

Notes:

NA = not applicable or not available

* = Toxicity data for 2,3,7,8-TCDD

Equations:

Particulate: $Child\ Exposure_{Noncancer}(ug/m^3) = \frac{CS_{residential} \times \frac{1}{PEF} \times EF_{child} \times ED_{child} \times ET_{child}}{AT_{noncancer}}$

VOCs: $Child\ Exposure_{Noncancer}(ug/m^3) = \frac{CS_{residential} \times \frac{1}{VF} \times EF_{child} \times ED_{child} \times ET_{child}}{AT_{noncancer}}$

$Noncancer\ Hazard = \frac{Intake_{noncancer}}{RfD}$

HHRA Appendix B, Table B-4
Cumulative Health Hazards from Multipathway Soil Exposure - Residential Exposure Scenario

COPC	Maximum Soil Concentration (mg/kg)	Residential Noncancer Hazard			
		Child Resident			
		Ingestion of Soil	Dermal	Inhalation	Total HI
Metals					
Antimony	290	9.27E+00	2.20E-01	6.82E-04	9.5E+00
Barium	4900	3.13E-01	7.43E-03	6.91E-03	3.3E-01
Beryllium	1.1	7.03E-02	1.67E-03	1.11E-04	7.2E-02
Cadmium	180	2.30E+01	5.46E-02	1.27E-02	2.3E+01
Chromium (VI)	1.7	2.42E-02	5.73E-04	4.00E-05	2.5E-02
Cobalt	82	3.49E+00	8.29E-02	9.64E-03	3.6E+00
Copper	6400	2.05E+00	4.85E-02	NA	2.1E+00
Nickel	490	5.70E-01	1.35E-02	2.47E-02	6.1E-01
Mercury	15	1.20E+00	2.84E-02	3.53E-04	1.2E+00
Molybdenum	29	7.42E-02	1.76E-03	1.02E-05	7.6E-02
Selenium	9.8	2.51E-02	5.95E-04	3.45E-07	2.6E-02
Silver	21	5.37E-02	1.27E-03	NA	5.5E-02
Thallium	16	2.05E+01	4.85E-01	NA	2.1E+01
Vanadium	190	4.86E-01	1.15E-02	1.34E-03	5.0E-01
Zinc	13000	5.54E-01	1.31E-02	NA	5.7E-01
Pesticides					
4,4'-DDT	0.015	3.84E-04	4.55E-05	NA	4.3E-04
4,4'-DDD	0.014	3.58E-04	4.25E-05	NA	4.0E-04
Chlordane	0.3	7.67E-03	9.10E-04	3.02E-07	8.6E-03
PCBs					
Aroclor-1248	0.14	NA	NA	NA	--
Aroclor-1260	0.098	NA	NA	NA	--
Aroclor-1268	0.071	NA	NA	NA	--
SVOCs					
1-Methylnaphthalene	0.39	7.12E-05	2.54E-05	9.17E-05	1.9E-04
2-Methylnaphthalene	0.23	7.35E-04	2.62E-04	1.01E-08	1.0E-03
Naphthalene	0.2	1.28E-04	4.55E-05	4.70E-08	1.7E-04
Acenaphthylene	0.38	8.10E-05	2.88E-05	1.12E-09	1.1E-04
Acenaphthene	0	0.00E+00	0.00E+00	0.00E+00	--
Fluorene	0.11	3.52E-05	1.25E-05	4.85E-10	4.8E-05
Phenanthrene	0.61	1.95E-04	6.94E-05	2.69E-09	2.6E-04
Anthracene	0.026	1.11E-06	3.94E-07	1.53E-11	1.5E-06
Fluoranthene	1.1	3.52E-04	1.25E-04	NA	4.8E-04
Pyrene	1.9	8.10E-04	2.88E-04	1.12E-08	1.1E-03
Benzo[a]anthracene	0.57	NA	NA	NA	--
Chrysene	0.92	NA	NA	NA	--
Benzo[b]fluoroanthene	1.6	NA	NA	NA	--
Benzo[k]fluoroanthene	0.54	NA	NA	NA	--
Benzo[a]pyrene	1.7	7.25E-02	2.58E-02	5.99E-04	9.9E-02
Indeno[1,2,3-cd]pyrene	1.1	NA	NA	NA	--
Dibenz[a,h]anthracene	0.21	NA	NA	NA	--
Dioxins					
Total Dioxins*	0.000147	2.68E+00	1.91E-01	2.59E-06	2.9E+00
TPH					
TPH (C5-C8 aliphatic low)	1700	5.57E-01	1.32E-01	1.93E-06	6.9E-01
TPH (C9-C18 aliphatic medium)	3200	2.15E+00	5.11E-01	1.19E-05	2.7E+00
TPH (C19-C32 aliphatic high)	6000	5.11E-01	1.21E-01	NA	6.3E-01
Total Hazard Index					**7.0E+01**

Notes:
"--" not applicable or not available
* = Toxicity data for 2,3,7,8-TCDD

HHRA Appendix B, Table B-5

Cancer Risks from Incidental Soil Ingestion - Residential Exposure Scenario

COPC	Maximum Soil Concentration (mg/kg)	Oral Slope Factor $(mg/kg\text{-}d)^{-1}$	Residential Scenario	
			Average Daily Intake (mg/kg-d)	Cancer Risk (Unitless)
			Adult & Child	Adult & Child
Metals				
Antimony	290	NA	4.17E-04	NA
Barium	4900	NA	7.05E-03	NA
Beryllium	1.1	NA	1.58E-06	NA
Cadmium	180	NA	2.59E-04	NA
Chromium (VI)	1.7	5.0E-01	2.45E-06	1.22E-06
Cobalt	82	NA	1.18E-04	NA
Copper	6400	NA	9.21E-03	NA
Nickel	490	NA	7.05E-04	NA
Mercury	15	NA	2.16E-05	NA
Molybdenum	29	NA	4.17E-05	NA
Selenium	9.8	NA	1.41E-05	NA
Silver	21	NA	3.02E-05	NA
Thallium	16	NA	2.30E-05	NA
Vanadium	190	NA	2.73E-04	NA
Zinc	13000	NA	1.87E-02	NA
Pesticides				
4,4'-DDT	0.015	3.4E-01	2.16E-08	7.34E-09
4,4'-DDD	0.014	2.4E-01	2.01E-08	4.83E-09
Chlordane	0.3	3.5E-01	4.32E-07	1.51E-07
PCBs				
Aroclor-1248	0.14	2.0E+00	2.01E-07	4.03E-07
Aroclor-1260	0.098	2.0E+00	1.41E-07	2.82E-07
Aroclor-1268	0.071	2.0E+00	1.02E-07	2.04E-07
SVOCs				
1-Methylnaphthalene	0.39	5.1E-02	5.61E-07	2.86E-08
2-Methylnaphthalene	0.23	NA	3.31E-07	NA
Naphthalene	0.2	1.2E-01	2.88E-07	3.45E-08
Acenaphthylene	0.38	NA	5.47E-07	NA
Acenaphthene	0	NA	0.00E+00	NA
Fluorene	0.11	NA	1.58E-07	NA
Phenanthrene	0.61	NA	8.77E-07	NA
Anthracene	0.026	NA	3.74E-08	NA
Fluoranthene	1.1	NA	1.58E-06	NA
Pyrene	1.9	NA	2.73E-06	NA
Benzo[a]anthracene	0.57	1.0E-01	8.20E-07	8.20E-08
Chrysene	0.92	1.0E-03	1.32E-06	1.32E-09
Benzo[b]fluoroanthene	1.6	1.0E-01	2.30E-06	2.30E-07
Benzo[k]fluoroanthene	0.54	1.0E-02	7.77E-07	7.77E-09
Benzo[a]pyrene	1.7	1.0E+00	2.45E-06	2.45E-06
Indeno[1,2,3-cd]pyrene	1.1	1.0E-01	1.58E-06	1.58E-07
Dibenz[a,h]anthracene	0.21	4.1E+00	3.02E-07	1.24E-06
Dioxins				
Total Dioxins*	0.000147	1.3E+05	2.11E-10	2.75E-05
TPH				
TPH (C5-C8 aliphatic low)	1700	NA	2.45E-03	NA
TPH (C9-C18 aliphatic medium)	3200	NA	4.60E-03	NA
TPH (C19-C32 aliphatic high)	6000	NA	8.63E-03	NA
Total Cancer Risk				**3.4E-05**

Notes:

NA = not applicable or not available

* = Toxicity data for 2,3,7,8-TCDD

Equations:

$$Adult/Child\ Intake_{cancer}\left(\frac{mg}{kg}day\right) = \frac{CS_{residential} \times ING_{adjusted} \times EF \times CF}{AT_{cancer}}$$

$$Where\ ING_{adjusted} = \left(\frac{IR\sim S_{child} \times ED_{child}}{BW_{child}}\right) + \left(\frac{IR\sim S_{adult} \times ED_{adult}}{BW_{adult}}\right)$$

$$Cancer\ Risk = Intake_{cancer} \times CSF$$

HHRA Appendix B, Table B-6
Cancer Risks from Dermal Contact with Soil - Residential Exposure Scenario

COPC	Maximum Soil Concentration (mg/kg)	Soil-to-Skin Absorption Factor (unitless)	Oral/Dermal Slope Factor $(mg/kg\text{-}d)^{-1}$	Residential Scenario	
				Average Daily Intake (mg/kg-d)	Cancer Risk (Unitless)
				Adult & Child	Adult & Child
Metals					
Antimony	290	0.01	NA	1.17E-05	NA
Barium	4900	0.01	NA	1.98E-04	NA
Beryllium	1.1	0.01	NA	4.45E-08	NA
Cadmium	180	0.001	NA	7.28E-07	NA
Chromium (VI)	1.7	0.01	5.0E-01	6.88E-08	3.44E-08
Cobalt	82	0.01	NA	3.32E-06	NA
Copper	6400	0.01	NA	2.59E-04	NA
Nickel	490	0.01	NA	1.98E-05	NA
Mercury	15	0.01	NA	6.07E-07	NA
Molybdenum	29	0.01	NA	1.17E-06	NA
Selenium	9.8	0.01	NA	3.97E-07	NA
Silver	21	0.01	NA	8.50E-07	NA
Thallium	16	0.01	NA	6.47E-07	NA
Vanadium	190	0.01	NA	7.69E-06	NA
Zinc	13000	0.01	NA	5.26E-04	NA
Pesticides					
4,4'-DDT	0.015	0.05	3.4E-01	3.03E-09	1.03E-09
4,4'-DDD	0.014	0.05	2.4E-01	2.83E-09	6.80E-10
Chlordane	0.3	0.05	3.5E-01	6.07E-08	2.12E-08
PCBs					
Aroclor-1248	0.14	0.15	2.0E+00	8.50E-08	1.70E-07
Aroclor-1260	0.098	0.15	2.0E+00	5.95E-08	1.19E-07
Aroclor-1268	0.071	0.15	2.0E+00	4.31E-08	8.62E-08
SVOCs					
1-Methylnaphthalene	0.39	0.15	5.1E-02	2.37E-07	1.21E-08
2-Methylnaphthalene	0.23	0.15	NA	1.40E-07	NA
Naphthalene	0.2	0.15	1.2E-01	1.21E-07	1.46E-08
Acenaphthylene	0.38	0.15	NA	2.31E-07	NA
Acenaphthene	0	0.15	NA	0.00E+00	NA
Fluorene	0.11	0.15	NA	6.68E-08	NA
Phenanthrene	0.61	0.15	NA	3.70E-07	NA
Anthracene	0.026	0.15	NA	1.58E-08	NA
Fluoranthene	1.1	0.15	NA	6.68E-07	NA
Pyrene	1.9	0.15	NA	1.15E-06	NA
Benzo[a]anthracene	0.57	0.15	1.0E-01	3.46E-07	3.46E-08
Chrysene	0.92	0.15	1.0E-03	5.58E-07	5.58E-10
Benzo[b]fluoroanthene	1.6	0.15	1.0E-01	9.71E-07	9.71E-08
Benzo[k]fluoroanthene	0.54	0.15	1.0E-02	3.28E-07	3.28E-09
Benzo[a]pyrene	1.7	0.15	1.0E+00	1.03E-06	1.03E-06
Indeno[1,2,3-cd]pyrene	1.1	0.15	1.0E-01	6.68E-07	6.68E-08
Dibenz[a,h]anthracene	0.21	0.15	4.1E+00	1.27E-07	5.23E-07
Dioxins					
Total Dioxins*	0.000147	0.03	1.3E+05	1.78E-11	2.32E-06
TPH					
TPH (C5-C8 aliphatic low)	1700	0.1	NA	6.88E-04	NA
TPH (C9-C18 aliphatic medium)	3200	0.1	NA	1.29E-03	NA
TPH (C19-C32 aliphatic high)	6000	0.1	NA	2.43E-03	NA
Total Cancer Risk					**4.5E-06**

Notes:

NA = not applicable or not available

* = Toxicity data for 2,3,7,8-TCDD

Equations:

$$Adult/Child\ Intake_{cancer}\left(\frac{mg}{kg}day\right) = \frac{CS_{residential} \times SAF_{adjusted} \times ABS \times CF}{AT_{cancer}}$$

$$Where\ SAF_{adjusted} = \left(\frac{SA_{child} \times AF_{child} \times EF_{child} \times ED_{child}}{BW_{child}}\right) + \left(\frac{SA_{adult} \times AF_{adult} \times EF_{adult} \times ED_{adult}}{BW_{adult}}\right.$$

$$Cancer\ Risk = Intake_{cancer} \times CSF$$

HHRA Appendix B, Table B-7
Cancer Risks from Inhalation of Outdoor Air - Residential Exposure Scenario

COPC	Maximum Soil Concentration (mg/kg)	PEF or VEF (m^3/kg)	Inhalation Unit Risk $(ug/m^3)^{-1}$	Residential Scenario	
				Exposure Concentration (ug/m^3)	Cancer Risk (Unitless)
				Adult & Child	Adult & Child
Metals					
Antimony	290	1.36E+09	NA	7.59E-05	NA
Barium	4900	1.36E+09	NA	1.28E-03	NA
Beryllium	1.1	1.36E+09	2.4E-03	2.88E-07	6.91E-10
Cadmium	180	1.36E+09	4.2E-03	4.71E-05	1.98E-07
Chromium (VI)	1.7	1.36E+09	1.5E-01	4.45E-07	6.68E-08
Cobalt	82	1.36E+09	9.0E-03	2.15E-05	1.93E-07
Copper	6400	1.36E+09	NA	1.68E-03	NA
Nickel	490	1.36E+09	2.6E-04	1.28E-04	3.34E-08
Mercury	15	1.36E+09	NA	3.93E-06	NA
Molybdenum	29	1.36E+09	NA	7.59E-06	NA
Selenium	9.8	1.36E+09	NA	2.57E-06	NA
Silver	21	1.36E+09	NA	5.50E-06	NA
Thallium	16	1.36E+09	NA	4.19E-06	NA
Vanadium	190	1.36E+09	NA	4.98E-05	NA
Zinc	13000	1.36E+09	NA	3.40E-03	NA
Pesticides					
4,4'-DDT	0.015	1.36E+09	9.7E-05	3.93E-09	3.81E-13
4,4'-DDD	0.014	1.36E+09	6.9E-05	3.67E-09	2.53E-13
Chlordane	0.3	1.36E+09	1.0E-04	7.86E-08	7.86E-12
PCBs					
Aroclor-1248	0.14	1.36E+09	5.7E-04	3.67E-08	2.09E-11
Aroclor-1260	0.098	1.36E+09	5.7E-04	2.57E-08	1.46E-11
Aroclor-1268	0.071	1.36E+09	5.7E-04	1.86E-08	1.06E-11
SVOCs					
1-Methylnaphthalene	0.39	1.36E+09	1.3E-05	1.02E-07	1.31E-12
2-Methylnaphthalene	0.23	1.36E+09	NA	6.02E-08	NA
Naphthalene	0.2	1.36E+09	3.4E-05	5.24E-08	1.78E-12
Acenaphthylene	0.38	1.36E+09	NA	9.95E-08	NA
Acenaphthene	0	1.36E+09	NA	0.00E+00	NA
Fluorene	0.11	1.36E+09	NA	2.88E-08	NA
Phenanthrene	0.61	1.36E+09	NA	1.60E-07	NA
Anthracene	0.026	1.36E+09	NA	6.81E-09	NA
Fluoranthene	1.1	1.36E+09	NA	2.88E-07	NA
Pyrene	1.9	1.36E+09	NA	4.98E-07	NA
Benzo[a]anthracene	0.57	1.36E+09	1.1E-04	1.49E-07	1.64E-11
Chrysene	0.92	1.36E+09	1.1E-05	2.41E-07	2.65E-12
Benzo[b]fluoroanthene	1.6	1.36E+09	1.1E-04	4.19E-07	4.61E-11
Benzo[k]fluoroanthene	0.54	1.36E+09	1.1E-04	1.41E-07	1.56E-11
Benzo[a]pyrene	1.7	1.36E+09	1.1E-03	4.45E-07	4.90E-10
Indeno[1,2,3-cd]pyrene	1.1	1.36E+09	1.1E-04	2.88E-07	3.17E-11
Dibenz[a,h]anthracene	0.21	1.36E+09	1.2E-03	5.50E-08	6.60E-11
Dioxins					
Total Dioxins*	0.000147	1.36E+09	3.8E+01	3.85E-11	1.46E-09
TPH					
TPH (C5-C8 aliphatic low)	1700	1.36E+09	NA	4.45E-04	NA
TPH (C9-C18 aliphatic medium)	3200	1.36E+09	NA	8.38E-04	NA
TPH (C19-C32 aliphatic high)	6000	1.36E+09	NA	1.57E-03	NA
Total Cancer Risk					**4.9E-07**

Notes:

NA = not applicable or not available

* = Toxicity data for 2,3,7,8-TCDD

Equations:

$$Particulate\ Exposure\ Concentration\ (\frac{ug}{m^3}) = (\frac{CS \times EF_{child} \times ED_{child} \times ET_{child}}{PEF \times AT_c}) + (\frac{CS \times EF_{adult} \times ED_{adult} \times ET_{adult}}{PEF \times AT_c}$$

$$VOC\ Exposure\ Concentration\ (\frac{ug}{m^3}) = \frac{CS \times EF \times ED \times ET}{VF \times AT_c}$$

$$Cancer\ Risk = Intake_{cancer} \times CSF$$

HHRA Appendix B, Table B-8
Cumulative Cancer Risks from Multipathway Soil Exposure - Residential Exposure Scenario

COPC	Maximum Soil Concentration (mg/kg)	Residential Cancer Risk			
		Adult & Child Resident			
		Ingestion	Dermal	Inhalation	Total Risk
Metals					
Antimony	290	NA	NA	NA	--
Barium	4900	NA	NA	NA	--
Beryllium	1.1	NA	NA	6.9E-10	6.9E-10
Cadmium	180	NA	NA	2.0E-07	2.0E-07
Chromium (VI)	1.7	1.2E-06	3.4E-08	6.7E-08	1.3E-06
Cobalt	82	NA	NA	1.9E-07	1.9E-07
Copper	6400	NA	NA	NA	--
Nickel	490	NA	NA	3.3E-08	3.3E-08
Mercury	15	NA	NA	NA	--
Molybdenum	29	NA	NA	NA	--
Selenium	9.8	NA	NA	NA	--
Silver	21	NA	NA	NA	--
Thallium	16	NA	NA	NA	--
Vanadium	190	NA	NA	NA	--
Zinc	13000	NA	NA	NA	--
Pesticides					
4,4'-DDT	0.015	7.3E-09	1.0E-09	3.8E-13	8.4E-09
4,4'-DDD	0.014	4.8E-09	6.8E-10	2.5E-13	5.5E-09
Chlordane	0.3	1.5E-07	2.1E-08	7.9E-12	1.7E-07
PCBs					
Aroclor-1248	0.14	4.0E-07	1.7E-07	2.1E-11	5.7E-07
Aroclor-1260	0.098	2.8E-07	1.2E-07	1.5E-11	4.0E-07
Aroclor-1268	0.071	2.0E-07	8.6E-08	1.1E-11	2.9E-07
SVOCs					
1-Methylnaphthalene	0.39	2.9E-08	1.2E-08	1.3E-12	4.1E-08
2-Methylnaphthalene	0.23	NA	NA	NA	--
Naphthalene	0.2	3.5E-08	1.5E-08	1.8E-12	4.9E-08
Acenaphthylene	0.38	NA	NA	NA	--
Acenaphthene	0	NA	NA	NA	--
Fluorene	0.11	NA	NA	NA	--
Phenanthrene	0.61	NA	NA	NA	--
Anthracene	0.026	NA	NA	NA	--
Fluoranthene	1.1	NA	NA	NA	--
Pyrene	1.9	NA	NA	NA	--
Benzo(a)anthracene	0.57	8.2E-08	3.5E-08	1.6E-11	1.2E-07
Chrysene	0.92	1.3E-09	5.6E-10	2.7E-12	1.9E-09
Benzo(b)fluoroanthene	1.6	2.3E-07	9.7E-08	4.6E-11	3.3E-07
Benzo(k)fluoroanthene	0.54	7.8E-09	3.3E-09	1.6E-11	1.1E-08
Benzo(a)pyrene	1.7	2.4E-06	1.0E-06	4.9E-10	3.5E-06
Indeno(1,2,3-cd)pyrene	1.1	1.6E-07	6.7E-08	3.2E-11	2.3E-07
Dibenz(a,h)anthracene	0.21	1.2E-06	5.2E-07	6.6E-11	1.8E-06
Dioxins					
Total Dioxins*	0.000147	2.7E-05	2.3E-06	1.5E-09	3.0E-05
TPH					
TPH-g	1700	NA	NA	NA	--
TPH-d	3200	NA	NA	NA	--
TPH-mo	6000	NA	NA	NA	--
Total Cancer Risk					**3.9E-05**

Notes:

"--" not applicable or not available

* = Toxicity data for 2,3,7,8-TCDD

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APPENDIX E. UPDATED PEA AND HUMAN HEALTH RISK ASSESSMENT (HHRA) TABLES FOR ALTERNAITVE 5

Note: The full PEA and Appendices are available on the District's website at: https://www.dropbox.com/scl/fi/bnvr2ro6hugpnr2d90gqi/404704001-PEA.pdf?rlkey=j0epntch2qzb71mauov1j2adb&e=3&dl=0)

Preliminary Endangerment Assessment Report

Mill Valley Middle School
425 Sycamore Avenue
Mill Valley, California

Mill Valley School District
411 Sycamore Avenue | Mill Valley, California 94941

October 16, 2025 | Project No. 404704001



Geotechnical | Environmental | Construction Inspection & Testing | Forensic Engineering & Expert Witness

Geophysics | Engineering Geology | Laboratory Testing | Industrial Hygiene | Occupational Safety | Air Quality | GIS

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October 16, 2025 | Project No. 404704001



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CONTENTS

EXECUTIVE SUMMARY 1

1 INTRODUCTION 5

2 SITE BACKGROUND 5

2.1 Site Description 5

2.2 Physical Setting 6

2.2.1 Regional and Site Geology 6

2.2.2 Regional and Site Hydrogeology 7

2.3 Historical Site Use 7

2.4 Site Use 8

2.5 Previous Work 8

2.6 Regulatory Oversight 10

3 PRELIMINARY ENDANGERMENT ASSESSMENT ACTIVITIES 10

3.1 Permits 11

3.2 Health and Safety Plan 11

3.3 Underground Service Alert and Private Utility Survey 11

3.4 Soil Borings 11

3.5 Soil Sampling 12

3.6 Grab-Groundwater Sampling 14

3.7 Surface Water Sampling 14

3.8 Decontamination Procedures 15

3.9 Soil Vapor Well Installation 16

3.10 Sub-Slab Vapor Pin Installation 16

3.11 Soil Vapor and Sub-Slab Vapor Sampling 17

3.11.1 December 2024 and July 2025 Soil Vapor Sampling 18

3.11.2 August 2025 Sub-Slab Vapor Sampling 21

3.12 Quality Assurance and Quality Control Measures 21

3.12.1 Duplicate Samples 21

3.12.2 Equipment Blanks 23

3.12.3 Trip Blanks 23

3.13 Investigation-Derived Waste 23

4 PRELIMINARY ENDANGERMENT ASSESSMENT RESULTS 24
4.1 Deviations from PEA Work Plan 25
4.2 Soil Borings 26
4.2.1 Extent of Waste 26
4.3 Soil Analytical Results 27
4.3.1 Title 22 Metals 27
4.3.2 TPHs 30
4.3.3 VOCs 30
4.3.4 PAHs 30
4.3.5 OCPs 31
4.3.6 PCBs 31
4.3.7 Dioxins 31
4.3.8 Asbestos 31
4.4 Grab-Groundwater Analytical Results 32
4.4.1 Title 22 Metals 32
4.4.2 TPHs 34
4.4.3 VOCs 34
4.5 Surface Water Analytical Results 34
4.5.1 Title 22 Metals 34
4.5.2 TPHs 35
4.5.3 VOCs 35
4.6 Soil Vapor Analytical Results 35
4.6.1 Fixed Gases 35
4.6.2 TPHg 35
4.6.3 VOCs 36
4.6.4 Leak Detection 37
4.7 Sub-Slab Vapor Analytical Results 37
4.7.1 Fixed Gases 37
4.7.2 TPHg 38
4.7.3 VOCs 38
4.7.4 Leak Detection 39
4.8 Data Quality 39
4.8.1 Chains of Custody 40
4.8.2 Method Blanks 40
4.8.3 Laboratory Control Samples/Laboratory Control Sample Duplicates 40
4.8.4 Surrogate Recoveries 40

4.8.5 Matrix Spikes/Matrix Spike Duplicates 40
4.8.6 Duplicate Samples 41
4.8.7 Flagged Data Discussion 41
4.9 Uncertainty 41
5 CONCEPTUAL SITE MODEL 42
5.1 Contaminants of Potential Concern and Potential Sources 42
5.2 Impacted Media 44
5.3 COPC Distribution in Soil 44
5.3.1 Title 22 Metals 44
5.3.2 TPHs 44
5.3.3 PAHs 44
5.3.4 Dioxins 45
5.4 COPC Distribution in Groundwater and Surface Water 45
5.4.1 Title 22 Metals 45
5.4.2 TPHs 45
5.5 COPC Distribution in Soil Vapor and Sub-Slab Vapor 46
5.5.1 TPHg 46
5.5.2 VOCs 46
5.5.3 Methane 46
5.6 Factors Related to Soil Pathway 47
5.7 Factors Related to Water Pathways 47
5.8 Factors Related to Air Pathways 48
6 HUMAN HEALTH RISK ASSESSMENT 48
6.1 Selection of Contaminants of Potential Concern 50
6.1.1 Organic Compounds 50
6.1.2 Metals 51
6.2 Arsenic in Soil 51
6.3 Lead in Soil 52
6.4 Exposure Assessment 52
6.4.1 Potential Receptors 52
6.4.2 Soil and Dust Exposure Point Concentrations 54
6.4.3 Vapor Inhalation of Chemicals in Indoor Air 54
6.5 Toxicity Assessment 56
6.5.1 Non-Carcinogenic Dose-Response Criteria 57
6.5.2 Carcinogenic Dose-Response Criteria 57

6.6 Risk Characterization 58
6.6.1 Average Daily Dose/Lifetime Daily Dose 59
6.6.2 Soil Exposure Non-Carcinogenic Health Hazard 60
6.6.3 Soil Exposure Cancer Risk Estimates 62
6.6.4 Vapor Intrusion Non-Carcinogenic Health Hazard 64
6.6.5 Vapor Intrusion Cancer Risk Characterization 64
6.7 HHRA Conclusions 65
7 ECOLOGICAL RISK ASSESSMENT 67
7.1 Site Characterization 68
7.2 Biological Characterization 68
7.2.1 Wildlife Habitat 68
7.3 Ecological Pathway Assessment 69
7.4 Screening-Level Ecological Risk Assessment 69
7.5 Statistical Analysis 70
7.6 ERA Conclusions 71
8 SEA LEVEL RISE ASSESSMENT 71
8.1 Baseline Conditions 73
8.2 Near-Term SLR: 2030, 2040, 2050 73
8.3 Mid-Term SLR: 2060 to 2100 74
8.4 Impacts of SLR 75
9 CONCLUSIONS AND RECOMMENDATIONS 76
10 LIMITATIONS 79
11 REFERENCES 81

TABLES

1 – Soil Sample Summary
2 – Soil Vapor Well Construction Details
3 – Soil Analytical Results: Title 22 Metals, STLC, TCLP, and pH
4 – Soil Analytical Results: Total Petroleum Hydrocarbons
5 – Soil Analytical Results: Volatile Organic Compounds
6 – Soil Analytical Results: Polycyclic Aromatic Hydrocarbons (PAHs)
7 – Soil Analytical Results: Organochlorine Pesticides (OCPs) and Polychlorinated Biphenyls (PCBs)
8 – Soil Analytical Results: Dioxins

9 – Soil Analytical Results: Asbestos

10 – Groundwater and Surface Water Analytical Results: Title 22 Metals

11 – Groundwater and Surface Water Analytical Results: Total Petroleum Hydrocarbons and Volatile Organic Compounds

12 – Soil Vapor and Sub-Slab Vapor Analytical Results: Total Petroleum Hydrocarbons, Volatile Organic Compounds, and Fixed Gases

FIGURES

1 – Site Location

2 – Site and Vicinity

3 – Preliminary Endangerment Assessment Sampling Locations

4 – Sub-Slab Vapor Pin Locations: Main Building

5 – Sub-Slab Vapor Pin Locations: Gymnasium

6 – Select Title 22 Metals Results in Soil

7 – TPH Results in Soil

8 – Dioxin Results in Soil

9 – Select Title 22 Metal Results in Water

10 – TPH Results in Water

11 – Select VOC Results in Soil Vapor and Sub-Slab Vapor

12 – Site Plan with Cross-Section Lines

13 – Cross-Section A-A’

14 – Cross-Section B-B’

15 – Cross-Section C-C’

16 – Cross-Section D-D’

17 – Cross-Section E-E’

18 – Cross-Section F-F’

19 – Methane Sensor Locations: First Floor

20 – Methane Sensor Locations: Second Floor

21 – Methane Sensor Locations: Gymnasium

22 – Conceptual Site Model Exposure Pathways

23 – Sea Level Rise Projection (12-Inches)

24 – Sea Level Rise Projection (36-Inches)

25 – Sea Level Rise Projection (52-Inches)

APPENDICES

A – Boring Logs

B – Historical Aerial Images

C – Soil Boring and Soil Vapor Monitoring Well Permits

D – Soil Vapor Well Construction Diagrams

E – Soil Vapor and Sub-Slab Vapor Sampling Sheets

F – Investigation-Derived Waste Manifests and Analytical Reports

G – Laboratory Analytical Reports

H – Statistical Analysis of Soil Arsenic Data

I – Quality Assurance/Quality Control Data

J – Human Health Risk Assessment Summary Tables

K – Ecological Risk Assessment Summary Tables

L – Response to Comments Table

EXECUTIVE SUMMARY

On behalf of the Mill Valley School District (MVSD), Ninyo & Moore prepared this Preliminary Endangerment Assessment Report (PEA Report) for the Mill Valley Middle School property located at 425 Sycamore Avenue, Mill Valley, California (Site). The PEA Report was prepared to support the proposed redevelopment of the Site.

Historically, the Site operated as a household waste landfill and burn dump from the early 1900s until closing in the 1950s. Records indicate a cover of sandy clay was installed to prevent contact with underlying landfill waste before the school was built in 1969. The Marin County Environmental Health Services Division (MCEHS) is the Local Enforcement Agency (LEA) and provides oversight related to landfill regulations and requirements. The Site is currently used as a school and, because the proposed redevelopment may continue school use, the California Education Code requires that the California Department of Toxic Substances Control (DTSC) oversee the PEA process.

The PEA is an investigation to determine if Site conditions present a potential risk to human health and the environment. The objectives of this PEA were to:

- Collect subsurface and surface soil, groundwater and surface water, and soil vapor data to develop a conceptual site model (CSM);
- Identify and evaluate the extent of contaminants of potential concern (COPCs);
- Develop a risk assessment to determine if COPCs pose a risk to receptors; and
- Determine the need for response action, which may include remediation and/or mitigation, to facilitate Site redevelopment.

The Site is a roughly rectangular 10.2-acre property located on the northeast corner of Sycamore Avenue and Camino Alto in a mixed residential and commercial/industrial area. Most of the Site is located within the footprint of the former municipal landfill, the Mill Valley Dump. The Site is developed with the MVSD administrative building and Mill Valley Middle School. The Site surface consists of hardscape (asphalt, concrete, and buildings) and landscape areas. A drainage channel (known as Ryan Creek) cuts across the northern portion of the Site oriented west to east and discharges into the Pickleweed Inlet (known as the Sausalito Canal) to the east of the Site.

In November 2024, July 2025, August 2025, and September 2025, Ninyo & Moore conducted PEA investigation drilling and sampling activities and submitted environmental samples to analytical laboratories. Landfill waste associated with the former Mill Valley Dump was

encountered across the Site extending laterally to at least the northern, eastern, and southern Site boundaries. Depth to the top of the waste varied across the Site, ranging from approximately 0.5 to approximately 5 feet below ground surface (bgs), but was predominantly encountered at approximately 1 to 1.5 feet bgs across the Site. The thickness of the waste varies, ranging from approximately 2 feet thick to approximately 14.5 feet thick, with the greatest thickness in the center of the Site and thinning to the east and west. The waste is generally encountered from approximately 0 to 10 feet above mean sea level and is underlain by Bay Mud.

PEA analytical results indicate COPCs consist of metals, petroleum hydrocarbons, polycyclic aromatic hydrocarbons (PAHs), and dioxins in soil; metals and petroleum hydrocarbons in groundwater; and volatile organic compounds (VOCs) in soil vapor. COPC-impacted soil is primarily detected within the landfill waste prism and is heterogeneously distributed both laterally and vertically at the Site. The COPC impacts to soil appear to be vertically delineated by the Bay Mud. The highest concentrations of metals in COPC-impacted groundwater are primarily located in the central portion of the Site. Surface water was slightly impacted with lead and petroleum hydrocarbons in samples collected from the eastern half of Ryan Creek near Camino Alto.

A Human Health Risk Assessment (HHRA) was performed to evaluate potential health impacts associated with exposure to chemicals detected in soil, soil vapor, and sub-slab vapor beneath the Site. Current regulatory guidance requires risk assessments to be health-protective in nature (DTSC, 2022) and typically overestimate potential health risk at the Site based on current and proposed Site use. Therefore, actual risks associated with conditions evaluated and conclusions drawn in the HHRA are likely to be lower than those described therein.

Two scenarios were evaluated in the HHRA. The first scenario evaluates current potential risk to school receptors (i.e., staff and students) based on potential exposure scenarios related to current Site conditions (including consideration of building footprints). The second scenario adopts a more conservative risk evaluation by considering potential risk for future hypothetical residential users at the Site.[1] The exposure pathways evaluated consisted of inhalation of

[1] Although there are no plans for residential use at the Site, a residential use assumption is more conservative due to assumptions related to exposure pathways and length of exposure (both per day and over the course of many years).

ambient air potentially impacted by airborne dust, incidental ingestion of, and dermal contact to, COPC-impacted soil, and inhalation of COPC-impacted soil vapor in indoor air.[2]

The HHRA concluded that current Site conditions do not present a health risk to staff and students. Major findings are bulleted below:

- There is no risk of direct exposure to elevated arsenic or lead concentrations in soil for current Site users because the existing soil and hardscape cover prevents contact. Arsenic was detected in soil at concentrations greater than the Site-specific background concentration of 15 mg/kg, and lead was detected in soil at concentrations greater than DTSC's screening level of 80 mg/kg, which could pose a potential risk without mitigation. The average arsenic and lead concentrations (using the 95UCL) in the top foot of soil are below applicable SLs.

- Other COPCs detected in soil do not pose a cancer risk or health hazard for students in current school Site conditions.

- The incremental cancer risk estimated for school staff is 4E-06, which is slightly above the 1E-06 benchmark, well within the agency risk management range, based on the maximum detected dioxin toxicity equivalents (TEQ). When using the average dioxin concentration (based on a 95UCL), the incremental cancer risk for school staff is below the benchmark and deemed acceptable.

- VOCs detected in sub-slab vapor do not pose a cancer risk or health hazard to students or staff under current school Site conditions.

- The groundwater and surface water exposure pathways are incomplete and do not present a risk. Water supply to the school is provided by Marin Municipal Water District.

The HHRA also evaluated Site conditions assuming a future hypothetical residential use, the most conservative exposure assumption which assumes exposure to COPCs 350 days per year, 24 hours per day, for a total of 26 years and assumes no mitigation measures. Major findings are bulleted below:

- Future hypothetical on-Site residents could have an elevated cancer risk or health hazard if directly exposed to maximum COPC concentrations in landfill waste if no mitigation measures were implemented. However, such exposure would not occur as precautionary measures and mitigation actions would be implemented as part of any redevelopment.

- VOCs detected in soil vapor could pose a cancer risk or health hazard to future hypothetical residential receptors if no mitigation measures were implemented. Again, such exposure would not occur as precautionary measures and mitigation actions would be implemented as part of any redevelopment.

---

[2] The exposure pathways for groundwater and surface water are considered incomplete and were not included in the HHRA.

An Ecological Risk Assessment (ERA) was conducted to evaluate potential exposure to ecological receptors that may use habitats within or near the Site. The ERA concluded:

- The soil exposure pathway to ecological receptors across the Site (excluding Ryan Creek) is considered incomplete. Therefore, COPCs detected within the school grounds do not pose a potential threat to ecological receptors.
- Maximum COPC concentrations in sediment samples collected from the bank of Ryan Creek and in groundwater and surface water samples could pose a potential threat to ecological receptors.

MVSD has collected soil, soil vapor, surface water, groundwater, and sub-slab vapor samples and has sufficient data to confirm that the Site does not present a health risk to students or staff under the current school use scenario. In accordance with DTSC guidance, an additional round of sub-slab vapor sampling will be conducted in the winter to evaluate temporal variability and to confirm that vapor intrusion is not a concern.

If the existing school site is modernized, MVSD will install a sub-slab vapor mitigation system as a preventative measure to further protect against landfill gas infiltrating campus buildings. Additionally, the MVSD plans to collect surface and/or groundwater samples (using silica gel cleanup) to further evaluate COPC-impacted groundwater and surface water, and potential exposure to ecological receptors.

1 INTRODUCTION

On behalf of the Mill Valley School District (MVSD), Ninyo & Moore prepared this Preliminary Endangerment Assessment Report (PEA Report) for the Mill Valley Middle School property located at 425 Sycamore Avenue, Mill Valley, California (Site, Figure 1). On April 17, 2024, the MVSD entered into a voluntary Environmental Oversight Agreement (EOA; Docket Number HAS-FY23/24-160) with the California Department of Toxic Substances Control (DTSC) to conduct a PEA and other related activities, if necessary, to evaluate and support the proposed redevelopment of the Site.

This PEA Report summarizes the PEA field sampling activities performed and presents the analytical results, a Human Health Risk Assessment (HHRA), an Ecological Risk Assessment (ERA), and a Sea Level Rise Assessment (SLRA). The PEA activities were performed in accordance with the proposed work presented in Ninyo & Moore's September 20, 2024 Preliminary Endangerment Assessment Work Plan, Revision 2 (PEA Work Plan; Ninyo & Moore, 2024b) and the October 2, 2024, PEA Work Plan Addendum (Addendum; Ninyo & Moore, 2024c), both of which were approved by the California Department of Toxic Substances Control (DTSC) on October 16, 2024. Subsequent sub-slab vapor and surface soil sampling in select landscaped areas was conducted as proposed in Ninyo & Moore's PEA Work Plan, Addendum 2 (2025b).

In addition, the Marin County Environmental Health Services Division (MCEHS), acting as the Local Enforcement Agency (LEA), reviewed and approved the PEA Work Plan and Addendum.

This report has been revised to address DTSC's July 3, 2025 comments and to incorporate additional soil, soil vapor, and sub-slab vapor data collected between July and September 2025. The HHRA has also been updated to incorporate the new data.

2 SITE BACKGROUND

This section describes the property and its surroundings, historical Site uses, plans for future Site redevelopment, and previous investigations.

2.1 Site Description

The Site is a roughly rectangular 10.2-acre property located on the northeast corner of Sycamore Avenue and Camino Alto in a mixed residential and commercial/industrial area in Mill Valley, California. The Site is comprised of one parcel (Assessor's Parcel Number [APN]: 030-111-07) and is located on a portion of the former Mill Valley Dump (Figure 2). The approximate extent of the former Mill Valley Dump expands beyond the Site boundaries and is bordered to the north by

commercial properties located to the south of East Blithedale Avenue, to the east by Camino Alto, and to the west by Pickleweed Inlet. The southern extent is not well delineated but appears to be partially bordered by Sycamore Avenue and partially located under a portion of the Sewerage Agency of Southern Marin. Based on review and interpretation of available historical aerial imagery and topographic maps (NetrOnline, 2024), information contained in the DTSC Preliminary Assessment (PA) report (DTSC, 2003), ownership information in the California Department of Resources Recycling and Recovery's (CalRecycle's) Solid Waste Information System (SWIS) database, and observations made during the PEA activities, it appears that the Mill Valley Dump is located on APNs 030-010-47, 030-111-07, 030-111-08, and 030-111-09.

The Site is currently developed with the MVSD administrative building and Mill Valley Middle School. It includes a large building on the west side of the Site and smaller buildings and portable classrooms on the eastern and northern portions of the Site. School parking lots are located along the southern and eastern Site boundaries, as well as a skate park in the southeast corner and a blacktop play area in the northeast corner of the Site (Figure 2). The Site surface consists of hardscape (asphalt, concrete, and buildings) and landscape areas. A drainage channel (known as Ryan Creek) cuts across the northern portion of the Site oriented west to east and discharging into the Pickleweed Inlet (also known as the Sausalito Canal) to the east of the Site. Ryan Creek is completely fenced off and locked to prevent unauthorized access.

2.2 Physical Setting

The Site is situated along the northwest extent of the Pickleweed Inlet in the southeast portion of Marin County (Figure 1). The Pickleweed Inlet discharges into Richardson Bay, which flows into the greater San Francisco Bay. The Site ranges in elevation from approximately 7 feet above mean sea level (amsl) on the east side to approximately 15 to 17 feet amsl on the west side.

2.2.1 Regional and Site Geology

The Site is located in the Coast Ranges geomorphic province of California and is underlain with Cretaceous and Jurassic-aged mélange of the Franciscan Complex (Jennings, 1977). Based on review of historical documents and observations made during PEA activities, overlaying the Franciscan Complex lithology across the majority of the Site is Bay Mud, typically encountered from approximately 9 to 10 feet below ground surface (bgs) to approximately 40 feet bgs. Overlaying the Bay Mud is waste from the former Mill Valley Dump encountered at variable depths across the Site ranging from approximately 0.5 to 15.5 feet bgs. In the southwestern portion of the Site, no waste or Bay Mud is encountered and a

sandstone bedrock is encountered at approximately 9.5 feet bgs and overlain by a sandy clay to silty sand. Boring logs from the PEA investigation are presented in Appendix A. The lateral and vertical extent of waste encountered at the Site during the PEA is discussed further in Section 4.2.1.

2.2.2 Regional and Site Hydrogeology

The Site is situated within the Angel Island-Frontal San Francisco Bay Estuaries sub-watershed within the greater San Francisco Bay watershed (USGS, 2025b). The Site was developed in an area that is naturally tidal marsh, with tidal marshes still present to the northwest and east of the Site. Ryan Creek cuts across the northern portion of the Site and is tidally influenced. The creek receives water from the upgradient watershed drainage through a culvert located at the western end of the creek and from the Pickleweed Inlet during high tide. A tidegate and pump station (known as Ryan Creek Pump Station) are located at the eastern end of Ryan Creek.

Groundwater has historically been encountered at approximately 3 to 9 feet bgs (DTSC, 2003). During PEA activities, groundwater was encountered in soil borings at approximately 3 feet bgs along the eastern Site boundary and south of Ryan Creek to approximately 10 to 12 feet bgs in the center of the Site. Groundwater was not encountered in any of the borings in the southwestern corner of the Site. Depth to groundwater observed in the soil borings during drilling is presented on the boring logs in Appendix A. Based on the Site's proximity to the tidally influenced Pickleweed Inlet and Ryan Creek, it is presumed that groundwater at the Site is also tidally influenced. Currently, there are no groundwater monitoring wells at the Site.

2.3 Historical Site Use

The Site was a portion of, and operated as, the Mill Valley Dump, a household waste landfill and burn dump from the early 1900s until closing in the 1950s. The dump operated for approximately 50 years, burning waste if possible and spreading the remaining waste across the dump. The historical extent of the dump extends beneath properties located to the north and south of the Site. Prior to landfill operations, the Site was undeveloped tidal marsh. Mill Valley Middle School was built at the Site in 1969 (DTSC, 2003). The Site, except for the southwest corner, overlies landfill waste.

A review of historical aerial images from 1946 to 2020 indicate the following:

1946: A majority of the Site remains tidal marsh with various buildings present in the southwest corner. It appears waste is present and extends from the on-Site buildings to the east along the southern side of the drainage channel.

1952: Buildings in the southwest corner remain and waste appears to have been spread across the entire eastern portion of the Site and on the north side of the drainage channel. The majority of the Site is covered with waste and little tidal marsh remains.

1956: Waste appears to extend further north.

1963: Buildings in the southwest corner of Site remain but vegetation growth is visible on the waste, indicating landfill operations have ceased.

1968: There appears to be a new building and graded area on east side of Site.

1974: Historical Site buildings no longer present and current school buildings (excluding portable buildings) and hardscape (asphalt and concrete paved areas) present.

1983 through 2012: No change observed.

2016 and 2020: Portable buildings present, no other changes observed.

The historical aerial images are presented in Appendix B. Note, the Site boundary depicted on the historical aerial images in Appendix B is inconsistent with the Site's redevelopment project boundary, which is accurately depicted in PEA Report Figures 1 through 12, 23, 24, and 25. The discrepancy arose because the historical aerial images were obtained from EDR® prior to confirming the Site boundaries for purposes of the proposed project. Despite what is shown on the historical aerial images in Appendix B, the marsh and soccer fields to the north are not part of the Site. The Site boundary depicted on PEA Report Figures 1 through 12, 23, 24, and 25 is accurate and should be referenced.

2.4 Site Use

This PEA evaluates the continued use of the Mill Valley Middle School buildings, which may be modernized within their existing footprints.

2.5 Previous Work

Since 1981, limited environmental soil, groundwater, and air testing has been conducted in association with the former Mill Valley Dump. The limited investigations were performed to the north of the Site for redevelopment of the Mill Valley Community Center, to the south of the Site for the construction of the sewage treatment plant, somewhere along Ryan Creek, and in the

vicinity of the Ryan Creek Pump Station. Additionally, ambient air in the eastern portion of the Mill Valley Middle School was monitored to evaluate the potential presence of methane gas.

In November 1981, the Department of Health Services (DHS; predecessor to DTSC) collected two soil samples and one surface water sample along the bank of Ryan Creek. The exact locations of the samples were unable to be determined. Sample results indicated elevated levels of select metals including iron, zinc, arsenic, lead, and barium in soil but did not indicate hazardous waste contamination (DHS, 1982). A copy of the DHS letter providing the analytical results is located on the State Water Resources Control Board GeoTracker website (GeoTracker; Global ID: SLT2O102108).

In September 1982, Harding Lawson Associates (HLA) conducted an investigation for methane gas in the eastern portion of the Mill Valley Middle School. The investigation included collecting ambient air samples in various locations within rooms of the school. Results of the investigation concluded there was no methane present in any of the sampling locations inside the school (HLA, 1982). A copy of the HLA report is located on GeoTracker.

In October 1988, soil and groundwater samples were collected from within a test pit excavated for construction of the Ryan Creek Pump Station located at the eastern end of Ryan Creek, and a surface water sample was collected from the creek. Groundwater was encountered at approximately 5 feet bgs and soil samples were collected from approximately 4.5 to 5 feet bgs. Results of the sampling indicated elevated levels of lead and zinc in soil, but the groundwater and surface water samples appeared to be unimpacted (Herzog, 1989). A copy of the report is located on GeoTracker.

In 2002, DTSC conducted a Preliminary Assessment (PA) to review existing information pertaining to the former landfill to assess whether its historical use posed a threat to human health and the environment and whether additional investigation was required (DTSC, 2003). The PA was performed on the entire landfill, which included the Site. A summary of historical sampling events was provided in the PA Report and include the following:

- In 1989 and 1993, the DHS and DTSC, respectively, conducted a total of two screenings of the former dump, with no apparent problems observed.
- From 1981 to 2002, MCEHS oversaw soil, groundwater, and ambient air sampling. Lead in soil was the only contaminant detected above applicable screening levels at the time.

DTSC, in the PA, concluded that lead-impacted soil was primarily encountered from 7.5 to 13.5 feet bgs, a soil cover of 2 to 3 feet of sandy clay was present, there was no evidence of contamination with an exposure pathway that presented a risk to human health or the environment, and, as a result, no further federal assessment or oversight was warranted (DTSC, 2003).

In June 2024, Ninyo & Moore conducted a geotechnical and geologic hazard assessment of the Site for the proposed redevelopment. The assessment included advancing 14 soil borings using solid-stem augers and mud rotary wash techniques to depths of up to approximately 42 feet bgs and advancing five cone penetrometer test (CPT) borings to depths of up to 45 feet bgs. Soil samples were collected from the soil borings for geotechnical laboratory testing including, but not limited to, moisture content, organic content, and pH. (Ninyo & Moore, 2024a). Results of the geotechnical assessment indicated that the depth to landfill waste and Bay Mud and lithology thicknesses were generally consistent with observations made during the PEA (as discussed further below). Groundwater was encountered at depths between approximately 2 and 9 feet bgs, except in the southwest corner where no groundwater was encountered.

2.6 Regulatory Oversight

The Site, which is located on a portion of the former Mill Valley Dump, is subject to regulatory oversight of MCEHS, as the LEA. Review of CalRecycle's SWIS database indicates that the Mill Valley Dump (SWIS Number 21-CR-009) is a closed landfill with a regulatory status of "To Be Determined (TBD)." The landfill is considered a "pre-regulation" site, because it stopped accepting waste prior to January 1, 1988. According to inspection records in the SWIS database, the Site has been inspected quarterly by the LEA and/or CalRecycle since February 12, 1996.

Because the Site is currently a school and the proposed redevelopment of the Site will also be a school, the MVSD entered into a voluntary EOA with the DTSC in April 2024 for the DTSC to provide oversight of the PEA process. DTSC is responsible for overseeing the PEA process and is working in conjunction with the LEA.

3 PRELIMINARY ENDANGERMENT ASSESSMENT ACTIVITIES

The primary objectives of this PEA are to collect subsurface soil, groundwater, and soil vapor data to develop a conceptual site model (CSM), identify and evaluate the extent of contaminants of potential concern (COPCs), develop a risk assessment to determine if COPCs pose a risk to receptors or the environment, and determine the need for remediation and/or mitigation to facilitate Site redevelopment.

To achieve these objectives, Ninyo & Moore performed soil, soil vapor, sub-slab vapor, grab-groundwater, and surface water sampling at the Site in accordance with the PEA Work Plan, Addendum, and PEA Work Plan Addendum 2. All sample locations are shown on Figure 3. Details of Ninyo & Moore's sampling activities are presented in the following sections.

3.1 Permits

A Soil Boring Permit (Permit No. THB39247) for the soil borings and a Monitoring Well Permit (Permit No. MWB39246) for the soil vapor wells were obtained from MCEHS (Appendix C).

3.2 Health and Safety Plan

Prior to conducting any field work, Ninyo & Moore prepared a Site-specific Health and Safety Plan (HASP) to identify potential hazards and outline procedures and safeguards to be implemented to protect Site workers. The HASP was submitted to the LEA and DTSC prior to implementation and was kept on-Site during all field activities and signed by each Site worker.

3.3 Underground Service Alert and Private Utility Survey

Prior to drilling activities, the boring locations were marked on the ground with white paint and/or flags, and Underground Service Alert (USA) North was notified. Utility field personnel subsequently marked utility locations surrounding the Site, and Ninyo & Moore retained Ground Penetrating Radar Systems, LLC (GPRS) of Oakland, California to scan the vicinity of the boring, soil vapor probe, and sub-slab vapor pin locations for the presence of subsurface utilities. On October 17, 2024, GPRS provided utility location services to verify the underground utility markings made by USA and to identify the locations of any unmarked utilities in the vicinity of the boring locations. On August 30, 2025, GPRS provided utility location services during sub-slab vapor pin installations to identify any utilities and rebar in the building foundations. Boring, soil vapor probe, and sub-slab vapor pin locations are shown on Figure 3.

3.4 Soil Borings

Soil boring advancement and soil vapor well installations were completed by PeneCore Drilling (PeneCore; C-57 License No. 906899) of Woodland, California from November 11 through 16, 2024. Field work was conducted overnight out of an abundance of caution and to accommodate the school schedule. A total of 55 borings (SB-1 through SB-44 and VP-1 through VP-11) were advanced to various depths throughout the Site ranging from approximately 2.5 feet bgs to 20 feet bgs. Five borings (SB-15 and SB-41 through SB-44) were advanced to 2.5 feet bgs using a hand auger for the collection of soil samples. The top 5 feet of the remaining 50 borings were advanced

using a hand auger, to further mitigate the potential for underground utility strikes, and then advanced to the total depth using a track-mounted direct push drill rig. Eleven of the borings (VP-1 through VP-11) were advanced to install dual-nested soil vapor probes. Soil vapor well installations are discussed further in Section 3.9. Fourteen soil borings (SB-12, SB-14, SB-15, SB-17, SB-22 through SB-25, SB-27, SB-29, and SB-41 through SB-44) were advanced within 2 feet of the building foundation, as required in DTSC's Interim Guidance Evaluation of School Sites with Potential Soil Contamination as a Result of Lead from Lead-Based Paint, Organochlorine Pesticides from Termiticides, and Polychlorinated Biphenyls from Electrical Transformers (DTSC, 2006).

Soils were continuously logged by a Ninyo & Moore field geologist using the Unified Soil Classification System (USCS) and screened with a photoionization detector (PID) as a qualitative indicator of the potential occurrence of volatile organic compounds (VOCs). Because the Site is part of a landfill, soil samples were additionally screened for methane with a portable gas monitor and radiation using a handheld digital radiation meter capable of measuring alpha, beta, and gamma radiation. Following sample collection, all boreholes were either backfilled with neat cement grout using a tremie pipe or converted to soil vapor wells. Boring locations are shown on Figure 3, and boring logs are provided as Appendix A.

3.5 Soil Sampling

Soil samples collected from the top 5 feet of a boring were collected directly from the hand auger. Soil samples collected deeper than 5 feet bgs were collected from an acetate liner within the direct push rig drill rods. A total of 188 soil samples were collected during the PEA investigation. Soil sample nomenclature consisted of the boring identification followed by the depth the sample was collected. For example, the sample 'SB-1-0.5' indicates the soil sample collected from SB-1 at a depth of 0.5 feet bgs.

Surface soil samples (0 to 0.5-foot bgs) SS-1 through SS-4 were collected from the bank of the Ryan Creek with locations targeting soils visibly mixed with debris. On September 6, 2025, surface soil samples LSS-1 through LSS-10 were collected in select landscape areas to further evaluate the soil cover at the Site. Surface soil samples were collected from 0 to 0.5 feet bgs using a properly decontaminated hand trowel or disposable scoops. Creek bank and landscape sample locations are shown on Figure 3.

All samples were placed in laboratory-supplied glass jars, labelled, placed on ice in a cooler, and transported to Enthalpy Analytical (Enthalpy), a California-certified analytical laboratory, via a

courier for analysis under chain-of-custody procedures. Soil samples analyzed for total petroleum hydrocarbons (TPH) as gasoline (TPHg) and VOCs were collected in accordance with United States Environmental Protection Agency (EPA) Method 5035. Soil samples were analyzed for total metals concentrations according to EPA Methods 6010B and 7471A for comparison to the Total Threshold Limit Concentrations (TTLC). Samples with total metal concentration(s) that exceeded 10 times the Soluble Threshold Limit Concentrations (STLC) value and/or 20 times the Toxicity Characteristics Leaching Procedure (TCLP) value were analyzed for comparison to the STLC and TCLP values for those metals.[3] Soil samples that were analyzed for STLC and/or TCLP were also analyzed for pH. Soil samples were analyzed for the following COPCs:

- 188 soil samples were analyzed for Title 22 Metals by EPA Methods 6010B and 7471A.
    - Of the 188 samples, 91 samples had total metal concentrations that exceeded the numerical STLC value and were therefore analyzed according to the Waste Extraction Test (WET) and/or the TCLP. Samples were evaluated pursuant to the WET for antimony, arsenic, barium, cadmium, chromium, copper, lead, nickel, mercury, and zinc. Samples were evaluated pursuant to the TCLP for arsenic, barium, chromium, lead, and mercury.
    - Additionally, 31 of the 188 samples were analyzed for hexavalent chromium (CrVI) by EPA Method 7199 to differentiate between trivalent chromium and hexavalent chromium.
- 165 soil samples were analyzed for TPHg and VOCs by EPA Method 8260B.
- 164 soil samples were analyzed for:
    - TPH as diesel (TPHd) and TPH as motor oil (TPHmo) by EPA Method 8015M; and
    - Polycyclic aromatic hydrocarbons (PAHs) by EPA Method 8270C-SIM.
- 53 soil samples were analyzed for dioxins by EPA Method 8290.
- 29 soil samples were analyzed for:
    - Organochlorine pesticides (OCPs) by EPA Method 8081A; and

[3] Analytical tests that evaluate a sample for comparison to the STLC and TCLP thresholds (i.e., the Waste Extraction Test and the Toxicity Characteristic Leaching Procedure, respectively) use a digestion extraction method that is designed to emulate conditions in a landfill to determine leaching potential. Because the leaching tests use a more aggressive technique, they are typically performed only when the results of a total metals analysis exceed 10 times the STLC value or 20 times the TCLP value.

- Polychlorinated biphenyls (PCBs) by EPA Method 8082.

- 7 soil samples were analyzed for asbestos by California Air Resource Board (CARB) Method 435.

Soil samples were submitted on a standard 7- to 10-day turnaround time, except for the surface soil samples collected on September 6, 2025, which were submitted on an expedited 3-day turnaround time. A soil sample summary, indicating which analyses were performed on which samples, is presented in Table 1.

3.6 Grab-Groundwater Sampling

Grab-groundwater samples were collected using a peristaltic pump to minimize sample turbidity and volatilization of potential VOCs. New disposable polyvinyl chloride (PVC) blank casing and well screen was placed in the borings prior to sample collection. The temporary casing screened interval was positioned in the top 5 feet of the water table. Sampling depths varied based on field observations of first encountered groundwater. Grab-groundwater samples were collected using the peristaltic pump equipped with new tubing for each sample location. The tubing was lowered through the temporary PVC casing and kept below the water surface. Groundwater samples were placed into clean sampling containers supplied by the analytical laboratory. Prior to collecting the grab-groundwater samples, the tubing was purged of sediment to the extent possible. Groundwater samples for VOC analysis were collected without headspace in the sample container. In accordance with DTSC's Human and Ecological Risk Office (HERO) HHRA Note Number 4, groundwater samples were not filtered to allow for a conservative risk evaluation (DTSC, 2022a). Groundwater samples were labeled, placed on ice in a cooler, and transported via courier under chain-of-custody procedures to Enthalpy for analysis. A total of 7 grab-groundwater samples were collected and analyzed for:

- Title 22 Metals by EPA Methods 6010B and 7470A (unfiltered);
- TPHg and VOCs by EPA Method 8260B; and
- TPHd by EPA Method 8015M.

All grab-groundwater samples were submitted on a standard 7- to 10-day turnaround time.

3.7 Surface Water Sampling

Surface water samples (SW-1 through SW-3) were collected from the surface of the water flowing in Ryan Creek using a telescopic sample collection dipper on November 15, 2024. Sample SW-1

was collected upgradient of the creek area that has exposed debris near the culvert on the west end of the creek, sample SW-2 was collected from the area of the creek with exposed debris, and sample SW-3 was collected at the east end of the creek that has exposed debris. Samples were placed in laboratory supplied containers, labeled, placed on ice, and transported via courier to Enthalpy under chain-of-custody protocol. The surface water samples were analyzed for:

- Title 22 Metals by EPA Methods 6010B and 7470A (unfiltered);
- TPHg and VOCs by EPA Method 8260B; and
- TPHd by EPA Method 8015M.

All surface samples were submitted on a standard 7- to 10-day turnaround time.

According to the nearest National Oceanic and Atmospheric Administration (NOAA) San Francisco Tide Station (Station ID: 9414290), which is located approximately 7.2 miles to the south-southeast, the surface water samples were collected while the tides were transitioning from high tide to low tide. Sample SW-1 was collected at approximately 4.51 feet above the mean lower-low water (MLLW) level, SW-2 was collected at approximately 3.46 feet above the MLLW, and SW-3 was collected at approximately 2.87 feet above the MLLW. For reference, high tide was 7.05 feet above the MLLW approximately 2 hours prior to sampling and low tide was -1.52 feet below the MLLW approximately 3.5 hours after sampling (NOAA, 2025).

3.8 Decontamination Procedures

All equipment that came into contact with potentially contaminated media was decontaminated to assure the quality of samples collected. Disposable equipment intended for one-time use was not decontaminated but was packaged for appropriate disposal. Decontamination occurred prior to, and after each use, of a piece of equipment. All drilling and sampling devices used were decontaminated using the following procedures:

1. Pre-wash rinse of tap water, to remove sediments from the sampling equipment.
2. Non-phosphate detergent in tap water wash, using a brush, if necessary.
3. Tap-water rinse.
4. Initial deionized/distilled water rinse.
5. Final deionized/distilled water rinse.

3.9 Soil Vapor Well Installation

Ninyo & Moore installed three dual-nested soil vapor probes (VP-1, VP-3, and VP-7) and seven single soil vapor probes (VP-2, VP-4, VP-5, VP-6, and VP-9 through VP-11) at the locations shown on Figure 3. Soil vapor probe VP-8 was not installed due to the presence of shallow groundwater. The total depth of each boring was approximately 10.5 feet bgs, except for VP-2 which had a total depth of 6 feet bgs due to refusal during drilling. Each soil vapor probe was constructed with a permeable stainless steel probe, connected to ¼-inch outer diameter Teflon® tubing and Swagelok® connection fittings. Dual-nested soil vapor wells consist of probes installed at approximately 5 and 10 feet bgs and each surrounded by 12-inches of Monterey 2/12 sand pack from approximately 4.5 to 5.5 feet bgs and 9.5 to 10.5 feet bgs, respectively. Above the sand pack, 12-inches of dry granular bentonite was placed. Above the deeper dry granular bentonite interval at 8.5 to 9.5 feet bgs, neat cement was placed in the boring to approximately 5.5 feet bgs. Above the upper dry bentonite interval (3.5 to 4.5 feet bgs) neat cement was placed to approximately 0.5 feet bgs.

Soil vapor wells VP-2 and VP-4 through VP-6 were installed at 5 feet bgs, VP-9 was installed at 4.5 feet bgs, VP-10 was installed at 3 feet bgs, and VP-11 was installed at 2.5 feet bgs. Each probe was surrounded by at least 1-foot of Monterey 2/12 sand pack followed by at least 6-inches of dry granular bentonite and neat cement to approximately 0.5-foot bgs. For borings advanced to 10.5 feet bgs and where groundwater was encountered shallower than 10 feet bgs, each boring was backfilled with dry granular bentonite from below the sand pack to the total depth of 10.5 feet bgs.

The tubing of each soil vapor probe was capped and the tubing of each deeper soil vapor probe for the dual-nested wells was demarcated with a piece of black tape. All soil vapor wells were finished at the surface using traffic-rated flush mounted well boxes encased in concrete aprons. Each soil vapor well was installed in general accordance with DTSC's July 2015 *Advisory - Active Soil Gas Investigations* guidance document (Soil Gas Advisory; DTSC, 2015a). Soil vapor well construction details are shown on the construction diagrams in Appendix D and presented in Table 2. Department of Water Resources (DWR) Well Completion Reports for completed soil vapor wells were submitted through DWR's Online System of Well Completion Reports (OSWCR).

3.10 Sub-Slab Vapor Pin Installation

On August 30, 2025, Ninyo & Moore oversaw the installation of sub-slab vapor pins, SSP-1 through SSP-11, by VTS Drilling LLC (VTS, C-57 License #916085) of Hayward, California. Each sub-slab vapor pin was installed by drilling a 1.5-inch diameter hole into the concrete foundation

to a depth of approximately 1.75-inches. Then a 5/8-inch hole was drilled through the center of the larger hole until it penetrated the bottom of the foundation. Foundation thickness ranged from approximately 5-inches for SSP-1 through SSP-3 to approximately 10-inches for SSP-4 through SSP-11.

The sub-slab vapor pins were assembled with a silicone sleeve around the base to form an air-tight seal during installation into the drilled hole. The sub-slab vapor pins were then capped and covered flush with the foundation surface. Each sub-slab vapor pin was installed in general accordance with DTSC's Soil Gas Advisory and manufacturer standard operating procedures. The location of the sub-slab vapor pins in relation to all other sampling locations is shown on Figure 3. The locations of sub-slab vapor pins within the MVSD administrative offices and main school building are shown on Figure 4 and for the gymnasium on Figure 5. Sub-slab vapor pin construction details are shown on the construction diagrams in Appendix D.

3.11 Soil Vapor and Sub-Slab Vapor Sampling

Three rounds of soil vapor and/or sub-slab vapor sampling have been conducted:

1. On December 23 and 24, 2024, Ninyo & Moore collected soil vapor samples from soil vapor probes VP-1-10, VP-2, VP-3-5, VP-7-5, VP-9, VP-10, and VP-11. Soil vapor samples could not be collected from VP-1-5, VP-4, VP-5, or VP-7-10 due to water in the tubing or from VP-3-10 or VP-6 due to low flow conditions.

2. On July 22, 2025, Ninyo & Moore collected soil vapor samples from soil vapor probes VP-1-5, VP-4, VP-5, VP-6, VP-7-5, VP-9, and VP-11. Soil vapor samples could not be collected from VP-1-10, VP-2, VP-3-10, or VP-7-10 due to water in the tubing or from VP-3-5 or VP-10 due to low flow conditions.

3. On August 31, 2025, Ninyo & Moore collected sub-slab vapor samples from vapor pins SSP-1 through SSP-11. Sampling of soil vapor and sub-slab vapor was performed in general accordance with the DTSC Soil Gas Advisory.

All samples for each of the three sampling events were collected using laboratory-certified 1-liter Summa canisters and manifolds provided by the analytical laboratory. Prior to sampling with the Summa canister equipment, a "shut-in" tightness test was performed on each sampling assembly. This was performed by sealing all openings to ambient air, establishing a vacuum inside the sampling manifold using a syringe, and waiting to ensure the vacuum remained stable for a minimum of 2 minutes. Once the sampling manifold passed the "shut-in" tightness test, it was

connected to the soil vapor well tubing or sub-slab vapor pin and approximately three calculated well casing or vapor pin volumes of vapor were purged, as applicable.

During sampling, a quantitative leak testing was performed during sampling using helium as a tracer gas. Each soil vapor well vault or sub-slab vapor pin, sample tubing, entire sampling train, and helium gas were enclosed within a shroud. Helium concentrations inside the shroud were monitored using a helium meter and were maintained at a minimum rate of 20 percent (%) during sampling.

Samples were collected using the sample canister to pull the soil vapor through the flow controller, pre-set by the laboratory to allow approximately 150 to 200 milliliters per minute of flow (mL/min), until a negative pressure of approximately 5 inches of mercury (in. Hg) was observed on the vacuum gauge. Prior to and after collecting each soil vapor sample, the vacuum of each sample canister was measured and recorded to ensure an adequate sample volume was collected. Soil vapor and sub-slab vapor sampling field sheets are provided as Appendix E. Details of each sampling event are presented below.

3.11.1 December 2024 and July 2025 Soil Vapor Sampling

In accordance with CalRecycle's Landfill Gas Sampling Procedures for Subsurface Landfill Gas Monitoring Wells (CalRecycle, 2014), field screening of the soil vapor probes for methane using a combustible gas indicator prior to collecting a soil vapor sample was performed. Results of the field screening were recorded on the soil vapor field sampling sheets. Soil vapor wells were purged using a calibrated Kelron pump during both the December 2024 and July 2025 sampling events.

December 2024 Sampling Event: A minimum of three well casing volumes were unable to be purged from vapor probes VP-1-10, VP-2, VP-3-5, and VP-9 due to low flow conditions. The flow rate of the Kelron pump used for purging would drop to approximately 3 to 4 mL/min. The pump was turned off to allow the high back pressure to dissipate and after a few minutes was turned back on to continue purging. This process was repeated multiple times until it was determined purging a minimum of three well casing volumes would not be practicable. After termination of purging, a few minutes were allowed to pass before sample collection. During sampling, high back pressure was observed, and the sampling of vapor wells VP-1-10, VP-2, and VP-3-5 was terminated with approximately 15 in. Hg, 17 in. Hg, and 23.5 in. Hg, respectively, remaining in the respective Summa canister. The presence of water in some vapor probe tubing and the high back pressure observed were likely due to shallow

groundwater conditions, attempts to sample during the rainy season, high soil moisture content, low permeable soil layers, and/or heterogeneity of the subsurface.

July 2025 Sampling Event: No purging or sampling was performed on soil vapor wells VP-1-10, VP-2, VP-3-10, or VP-7-10 due to water observed in the tubing. Ninyo & Moore attempted to remove the water using a syringe but was unsuccessful due to the amount of water, indicating the vapor probes were likely submerged in shallow groundwater. Soil vapor wells VP-3-5 and VP-10 were unable to be purged and sampled due to low flow conditions. A high back pressure of approximately 10 in Hg occurred at the start of purging. The purge pump was turned off and the back pressure did not dissipate more than 0.5 in Hg after 15 to 20 minutes of waiting, indicating purging a minimum of three well casing volumes would not be practicable. The low flow conditions observed were likely due to shallow groundwater conditions, high soil moisture content, low permeable soil layers, and/or heterogeneity of the subsurface.

Soil vapor wells were qualitatively field screened for methane using an RKI Eagle II combustible gas indicator (CGI) prior to purging and sampling in accordance with CalRecycle's Landfill Gas Sampling Procedures guidance document (CalRecycle, 2014), as requested by the LEA. Methane readings ranged from 0% to the maximum capable equipment reading of 5%. Field screening using a CGI is a qualitative approach to evaluate if methane is present and does not provide accurate quantitative concentrations. Methane field readings of 5% indicate that methane may be present at 5% or higher. Quantitative methane concentrations are obtained through laboratory analysis of vapor samples. Quantitative methane results are presented in Section 4.6.1 and results of the qualitative methane gas field screening are presented in Table 3-1 below.

Table 3-1: Methane Gas Field Screening Results		
Soil Vapor Well ID	**Date**	**Methane Concentration (% volume)**
VP-1-5*	12/23/2024	0
VP-1-5	7/22/2025	0
VP-1-10**	12/23/2024	0
VP-1-10	7/22/2025	--
VP-2**	12/23/2024	0.05
VP-2	7/22/2025	--
VP-3-5**	12/23/2024	0
VP-3-5**	7/22/2025	0
VP-3-10**	12/23/2024	0
VP-3-10	7/22/2025	--
VP-4	12/23/2024	--
VP-4	7/22/2025	0.06
VP-5	12/23/2024	--
VP-5	7/22/2025	1
VP-6**	12/23/2024	0.15
VP-6	7/22/2025	0
VP-7-5	12/24/2024	0
VP-7-5	7/22/2025	0
VP-7-10*	12/24/2024	0.2
VP-7-10*	7/22/2025	5
VP-9**	12/24/2024	5
VP-9	7/22/2025	0
VP-10	12/23/2024	0
VP-10**	7/22/2025	1
VP-11**	12/23/2024	0
VP-11	7/22/2025	5

Notes:
ID = identification
% = percent
* = Water observed in tubing during field screening; as a result, uncertainty may be associated with screening result
** = Low flow conditions observed; uncertainty may be associated with screening results
-- = Field screening not performed due to water observed in tubing during initial pre-check for water

All sample canisters were labeled and submitted under chain-of-custody procedures to Eurofins Air Toxics LLC (Eurofins), a California-certified analytical laboratory, for analysis. A

total of nine soil vapor samples were collected in December 2024 and a total of eight soil vapor samples were collected in July 2025. All samples were analyzed for:

- TPHg and VOCs by EPA Method TO-15; and
- Fixed gases (oxygen, carbon dioxide, methane, and helium) by ASTM D1946.

All samples were submitted on a 7- to 10-day turnaround time.

3.11.2 August 2025 Sub-Slab Vapor Sampling

A minimum of three vapor pin volumes were purged from each vapor pin using a Gilair digital pump set at a flow rate of 50 mL/min. No issues were encountered during purging or sampling and a sample was collected from each sub-slab vapor pin. All sample canisters were labeled and submitted under chain-of-custody procedures to Eurofins for analysis. A total of 12 sub-slab vapor samples were collected and analyzed for:

- TPHg and VOCs by EPA Method TO-15; and
- Fixed gases (oxygen, carbon dioxide, methane, and helium) by ASTM D1946.

All samples were submitted on an expedited 3-day turnaround time.

3.12 Quality Assurance and Quality Control Measures

To evaluate the reliability and compatibility of data generated during the PEA investigation, the following field quality assurance and quality control (QA/QC) procedures were implemented.

3.12.1 Duplicate Samples

Duplicate samples were collected to evaluate the precision of both sampling techniques and laboratory testing. A summary of the parent and duplicate samples collected are presented in Table 3-2 below.

Table 3-2: Summary of Duplicate Samples

Parent Sample ID	Duplicate Sample ID	Date Sampled	Sample Matrix	Analyses Performed
SB-3-15	DUP-01	11/12/2024	Soil	Title 22 Metals, TPHs, VOCs, PAHs
SB-5-10	DUP-02	11/12/2024	Soil	Title 22 Metals, TPHs, VOCs, PAHs
SB-42-2.5	DUP-03	11/12/2024	Soil	Title 22 Metals, OCPs, PCBs

Table 3-2: Summary of Duplicate Samples

Parent Sample ID	Duplicate Sample ID	Date Sampled	Sample Matrix	Analyses Performed
GW-2	DUP-04	11/13/2024	Groundwater	Title 22 Metals, TPHs, VOCs,
SB-10-2.5	DUP-05	11/13/2024	Soil	Title 22 Metals, TPHs, VOCs, PAHs
SB-16-5	DUP-06	11/13/2024	Soil	Title 22 Metals, TPHs, VOCs, PAHs
SB-14-2.5	DUP-07	11/13/2024	Soil	Title 22 Metals, OCPs, PCBs
SB-13-6.5	DUP-08	11/14/2024	Soil	TPHg, VOCs
SB-21-0.5	DUP-09	11/14/2024	Soil	Title 22 Metals, TPHs, VOCs, PAHs
SB-26-2	DUP-10	11/14/2024	Soil	Title 22 Metals, TPHs, VOCs, PAHs
SB-32-11	DUP-11	11/15/2024	Soil	Title 22 Metals, TPHs, VOCs, PAHs
SB-24-2.5	DUP-12	11/15/2024	Soil	Title 22 Metals, OCPs, PCBs
SB-39-5	DUP-13	11/15/2024	Soil	Title 22 Metals, TPHs, VOCs, PAHs
SB-30-0.5	DUP-14	11/15/2024	Soil	Title 22 Metals, TPHs, VOCs, PAHs
VP-10	DUP-01	12/23/2024	Soil Vapor	TPHg, VOCs, Fixed Gases
VP-7-5	DUP-02	12/24/2024	Soil Vapor	TPHg, VOCs, Fixed Gases
VP-4	DUP-072225	7/22/2025	Soil Vapor	TPHg, VOCs, Fixed Gases
SSP-4	DUP-08312025	8/31/2025	Sub-Slab Vapor	TPHg, VOCs, Fixed Gases

Notes:
ID = identification
TPHs = Total petroleum hydrocarbons (as gasoline, diesel, and motor oil). Only TPH as gasoline and diesel analyzed for water samples.
TPHg = Total petroleum hydrocarbons as gasoline
VOC = Volatile organic compounds
PAHs = Polycyclic aromatic hydrocarbons
OCPs = Organochlorine pesticides
PCBs = Polychlorinated biphenyls
Fixed Gases = Oxygen, carbon dioxide, methane, helium

A summary of the duplicate sample frequency per sample matrix is presented in Table 3-3 below.

Table 3-3: Duplicate Sample Frequency

Sample Matrix	Number of Duplicate Samples	Number of Parent Samples	Duplicate Percent Rate
Soil	13	180	7%
Water	1	10	10%
Soil Vapor	3	14	21%
Sub-Slab Vapor	1	11	9%

Duplicate samples were labeled, packaged, and transported to the analytical laboratory under the same procedures as their parent sample and were tested for the same analyses as the parent sample.

3.12.2 Equipment Blanks

Equipment blank samples were collected on non-dedicated sampling equipment. Equipment blank samples were collected by pouring distilled water over decontaminated sampling equipment, sampling this water, and then submitting the sample for analysis. An equipment blank was collected at the rate of one sample per day for a total of five samples and submitted to the laboratory for analysis. Equipment blank samples collected from soil sampling equipment were analyzed for Title 22 Metals by EPA Method 6010B/7471. Equipment blanks are identified by 'EB' followed by the date. For example, the equipment blank 'EB-11122024' indicates an equipment blank collected on November 12, 2024. Equipment blank results are presented on Table 3.

3.12.3 Trip Blanks

Trip blank samples were submitted with coolers containing samples designated for VOC analysis. Trip blank samples were provided by the analytical laboratory and accompanied the sample containers and samples to the analytical laboratory. Trip blank samples were submitted at the rate of one per sample shipment container that included samples to be analyzed for VOCs. Nine trip blank samples were submitted to the analytical laboratory and analyzed for TPHg and VOCs by EPA Method 8260B. Trip blanks are identified by 'TB' followed by the date. For example, the trip blank 'TB-11132024' indicates a trip blank collected on November 13, 2024. Trip blank results are presented on Tables 4 and 5.

3.13 Investigation-Derived Waste

Investigation-derived waste (IDW) generated during the PEA investigation consisted of soil cuttings, decontamination water, and purged groundwater. The soil cuttings and water were segregated and stored in Department of Transportation (DOT)-approved 55-gallon steel drums, labeled, and temporarily stored on Site. Following completion of the PEA investigation, composite waste samples were collected from the soil cutting drums and water drums, sent to the analytical laboratory under chain-of-custody protocol, and analyzed per waste characterization disposal protocol. Analytical results of the composite waste samples classified both the soil cuttings and water as non-hazardous. On January 27, 2025, Belshire Environmental Services, Inc. (Belshire) removed the IDW drums from the Site and transported them to the appropriate waste facilities.

The soil cuttings were transported to Soil Safe in Adelanto, California and the water was transported to World Oil Recycling in Compton, California. The non-hazardous waste manifests and waste analytical reports are presented as Appendix F.

4 PRELIMINARY ENDANGERMENT ASSESSMENT RESULTS

Soil analytical results are presented on Tables 3 through 9, groundwater and surface water analytical results are presented on Tables 10 and 11, and soil vapor and sub-slab vapor analytical results are presented on Table 12. All sample locations are shown on Figure 3. Analytical results for select Title 22 Metals, TPHs, and dioxins in soil are provided on Figures 6 through 8, respectively. Analytical results for select Title 22 Metals and TPHs in water samples are provided on Figures 9 and 10, respectively. Analytical results for select VOCs in soil vapor and sub-slab vapor are presented on Figure 11. Geologic cross-sections are provided as Figures 12 through 18. Laboratory analytical reports are included in Appendix G.

Analytical results were compared to residential screening levels, which are the most conservative benchmarks used for risk evaluation and assume an exposure scenario of 350 days per year, 24 hours per day, for 26 years. The PEA first relies on DTSC's residential screening levels (SLs; DTSC, 2025b). Where DTSC residential SLs are not available, analytical results were compared to residential EPA Regional Screening Levels (RSLs; EPA, 2024). For TPHs, the San Francisco Bay Regional Water Quality Control Board's (SFBRWQCB's) residential Environmental Screening Levels (ESLs; SFBRWQCB, 2025) were used to evaluate concentrations detected in samples from all media.

Screening levels for soil vapor and sub-slab vapor were calculated by conservatively applying the appropriate attenuation factor (AF) to the indoor air screening levels with reference to CalEPA's February 2023 Final Draft Supplemental Guidance: Screening and Evaluating Vapor Intrusion (CalEPA VI Guidance; CalEPA, 2023).[4] According to that guidance, a default AF of 0.03 is used for the initial screening of sites (without consideration of Site-specific factors). Following discussion with DTSC, soil vapor analytical results from December 2024 were not evaluated against SLs, used in assessing risk, or used to inform project decision making due to uncertainty associated with the

[4] The attenuation factor estimates the percentage of contaminants in subsurface soil vapor that may potentially enter into a building. An attenuation factor of 0.03 assumes that 3% of the COPC concentration in subsurface soil vapor will enter into the indoor air.

reported concentrations. The uncertainty resulted from samples being collected within five days of a significant rain event, significant vacuum remaining in some sample canisters due to low flow conditions resulting in elevated reporting limits, and matrix interference likely caused by moisture in sample tubing from recent rainfall and shallow groundwater conditions. The soil vapor analytical results from December 2024 are presented on Table 12 for reference and the analytical laboratory reports are included in Appendix G but will not be discussed further herein.

4.1 Deviations from PEA Work Plan

During Ninyo & Moore's field work, the following deviations from the PEA Work Plan occurred due to Site conditions:

- Boring SB-15 was advanced to 2.5 feet bgs (as opposed to 15 feet bgs) due to small subsurface voids observed creating unsafe drilling conditions. While hand augering, full buckets of soil were being removed from the borehole but the borehole depth was not increasing. Multiple locations within 2 feet of the original boring location were attempted but the same issue was observed. The cause of the voids could not be determined and the borehole was abandoned at 2.5 feet bgs and backfilled with the soil cuttings.

- Boring SB-44 was moved approximately 40 feet to the west to allow better access for coring equipment. The boring was moved from an elevated walkway to a lower elevation at the ground surface but remained within 2 feet of the building foundation.

- Grab-groundwater samples GW-1, GW-2, and GW-4 were collected from different boring locations than originally proposed due to insufficient groundwater in the original locations. Sample GW-1 was collected from VP-4 instead of SB-1, GW-2 was collected from SB-8 instead of SB-6, and GW-3 was collected from SB-18 instead of SB-19.

- VP-2, VP-4, VP-5, VP-6, and VP-9 through VP-11 were not installed as dual-nested probes due to shallow groundwater. Instead, they were installed as single probes in each boring location above the observed groundwater depth. VP-8 was unable to be installed due to shallow groundwater.

- Soil vapor wells VP-9, VP-10, and VP-11 were installed shallower than 5 feet bgs due to shallow groundwater conditions.

- Soil samples SB-19-4, SB-20-10, SB-24-0.5, SB-24-9.5, SB-25-10, SB-26-5, SB-29-5, SB-31-10, SB-33-8.5, SB-36-7, SB-39-5, and SB-40-5 were detected with total metal concentrations that exceeded 10 times the STLC value and/or 20 times the TCLP value, but were unable to be analyzed for STLC, TCLP, and/or pH due to insufficient sample mass remaining after all other analytical tests had been performed on those samples. However, 91 other soil samples were analyzed for STLC, TCLP, and/or pH and adequately demonstrate the range of leachability characteristics at the Site.

4.2 Soil Borings

Soils encountered during the PEA field activities generally consisted of silty sand with some clay and gravel above the landfill waste and Bay Mud below the landfill waste. Soils located above the waste extended to approximately 4 feet bgs in the northwest corner of the Site and to approximately 1 to 2 feet bgs in landscaped areas across the Site. Paved areas of the Site were generally 0.5- to 1-foot thick and directly overlay the landfill waste on the eastern half of the Site. No landfill waste or Bay Mud was encountered in the southwest corner of the Site, where soils consisted of sand and silt to the total explored depth of 15 feet bgs with a clay layer from approximately 5 to 12 feet bgs. Refusal was encountered in the southwest corner in borings SB-6 and VP-2 at approximately 9.5 and 6 feet bgs, respectively. The depth to Bay Mud varied across the Site ranging in depth from approximately 5 to 15.5 feet bgs but was predominantly encountered at approximately 9 to 10 feet bgs.

No radiation or methane were detected with the combustible gas indicator and digital radiation meter during drilling activities. One boring (SB-6 at 5 feet bgs) was observed to have an elevated PID reading of 48 parts per million (ppm). Boring logs are included in Appendix A.

4.2.1 Extent of Waste

Most of the Site overlies the waste prism associated with the former Mill Valley Dump. The waste prism refers to the overall three-dimensional shape and volume of waste contained within the landfill. Landfill waste was encountered across the Site with the exception of the borings in the southwest corner (SB-2, SB-3, SB-4, SB-5, SB-6, SB-41, SB-42, SB-43, VP-1, and VP-2) and from surface soil sample locations within the landscape areas (LSS-1 through LSS-10). Waste was encountered in all other borings and extends laterally to at least the northern, eastern, and southern Site boundaries. Boring SB-11 was the most western soil boring along the southern boundary where waste was observed. The approximate lateral extent of the waste is shown on Figure 2.

Depth to the top of the waste varied across the Site, ranging from approximately 0.5 foot bgs (SB-20, SB-22, SB-24, SB-30, SB-40, and VP-8) to approximately 5 feet bgs (SB-33) but was predominantly encountered at approximately 1 to 1.5 feet bgs across the Site. The vertical extent of waste observed at the Site is delineated by the top of Bay Mud for a majority of the Site and the top of native soil (clayey to silty sand) in borings SB-11 and SB-12. The thickness of the waste at the Site varies but ranges from approximately 2 feet thick (SB-1) in the northwest corner to approximately 14.5 feet thick along the southern Site boundary (SB-18). Generally, the waste thickness is greatest in the center of the Site and appears to thin to the

east and west. The waste thickness is generally consistent between the northern and southern Site boundaries. Waste is generally encountered from approximately 0 to 10 feet amsl and appears to account for a majority of the landmass above the Bay Mud (Figures 13 through 18).

The types of waste encountered consisted of glass, wood, ceramics, cloth, plastic, and brick. A black layer consisting primarily of glass was encountered in borings located on the eastern and northern portions of the Site (SB-17, SB-20 through SB-25, SB-27 through SB-31, SB-35 through SB-39) at approximately 8.5 to 11 feet bgs and in the southeastern portion of the Site (SB-33 and SB-34) at approximately 4 feet bgs. This layer was generally encountered 1 to 3 feet above the Bay Mud and near the depth of first encountered groundwater. The dark-colored nature and lack of debris other than glass appears to indicate this may be a burned waste layer.

4.3 Soil Analytical Results

4.3.1 Title 22 Metals

Title 22 Metals detected at or above their residential DTSC SL or EPA RSL are presented in Table 4-1 below.

Table 4-1: Title 22 Metals Detected in Soil Above Residential SLs

Constituent	Residential SL or RSL (mg/kg)	Number of Detections Above SL/Total Samples[1]	Concentration Range Above SL (mg/kg)
Antimony	31	3/176	41 to 290
Arsenic	15*	27/176	15 to 230
Cadmium	7.1	4/176	7.7 to 180
Hexavalent Chromium	0.30	7/31	0.31 to 1.7
Cobalt	23	13/176	23 to 82
Copper	3,100	1/176	6,400
Lead	80	38/176	92 to 23,000
Mercury	0.67	30/176	0.69 to 15
Thallium	0.78	1/176	16

Notes:
mg/kg = milligrams per kilogram
SL = screening level
RSL = regional screening level
DTSC = Department of Toxic Substances Control
EPA = United States Environmental Protection Agency
[1] = Does not include duplicate samples or samples not analyzed for the constituent
* = Calculated Site-specific background level, see Appendix H
Analytical results were compared to DTSC SL or EPA RSLs if no DTSC SL is established

Lead, arsenic, and mercury were the most prevalent metals detected above the SLs. Metal concentrations detected above the SLs were primarily located within the landfill waste between 5 and 10 feet bgs (Figure 6). No metals were detected above the SLs in any of the surface soil samples collected from the bank of Ryan Creek. Lead and mercury were each detected in one surface soil sample from landscape areas above their respective SL at concentrations of 130 milligrams per kilogram (mg/kg; LSS-5) and 1.1 mg/kg (LSS-8), respectively.

Because arsenic is typically naturally occurring in California soil at concentrations greater than the DTSC SL, the Site background concentration is used as the SL for risk assessment purposes. A statistical analysis was performed on samples collected from native soil to determine the Site-specific arsenic background concentration. Soil samples considered to be native soil were collected from borings located in the southwest corner of the Site (with no observed landfill waste) and from the Bay Mud underlying the landfill waste. Because native soil was observed in the southwest corner of the Site where no waste was observed and Bay Mud is the native soil present beneath the landfill waste, samples collected from these areas are considered to be representative of natural arsenic background concentrations in the vicinity of the Site. Results of the statistical analysis indicate a background concentration of 15 mg/kg for arsenic in native Site soils. This Site-specific background concentration is generally consistent with DTSC-conducted studies of California soils.[5,6] Further discussion and results of the statistical analysis is presented in Appendix H.

Additional analysis was performed on 31 of the 176 parent samples (approximately 17% of samples) to differentiate between trivalent and hexavalent chromium. Hexavalent chromium is a more toxic form of chromium and according to DTSC's PEA Guidance Manual (PEA Manual; DTSC, 2015b), total chromium concentrations must be assumed to be hexavalent chromium unless further evaluation is performed. The highest total chromium concentrations were selected for hexavalent chromium analysis unless there was insufficient sample mass remaining to perform the analysis. Thirty-one samples (consisting of all surface soil samples

[5] DTSC Human and Ecological Risk Office (HERO), 2020. Human Health Risk Assessment Note Number 11, Southern California Ambient Arsenic Screening Level. December 28.

[6] DTSC, 2009. Arsenic Strategies, Determination of Arsenic Remediation Development of Arsenic Cleanup Goals. January 16.

from the landscape areas, as well as the samples with the highest total chromium concentrations with sufficient mass remaining) were selected to provide for lateral and vertical distribution across the Site. Of the 31 samples analyzed, 21 were “non-detect” for hexavalent chromium with laboratory reporting limits below the DTSC SL, three had hexavalent chromium detections above the laboratory reporting limit but below the DTSC SL, and seven had detections above the DTSC SL. The maximum concentrations of hexavalent chromium were detected in samples collected from either native soil or fill material and not collected from the landfill waste. Only two of the eleven samples collected from the landfill waste (SB-18-1 and SB-24-0.5) contained hexavalent chromium concentrations greater than the DTSC SL.

Barium, beryllium, trivalent chromium, molybdenum, nickel, selenium, silver, vanadium, and zinc were not detected at or above the residential SLs.

No DTSC SL is established for thallium but the EPA RSL is 0.78 mg/kg. The laboratory reporting limit for thallium ranged from 0.33 to 0.45 mg/kg in surface soil samples from landscape areas. The laboratory reporting limit for all other samples ranged from 0.97 to 3.0 mg/kg, which is greater than the EPA RSL. With the exception of sample SB-31-5, thallium was not detected at or above the laboratory reporting limit. Two soil studies conducted in California reported that thallium is naturally occurring in California soils in concentrations greater than the EPA RSL. A study by the Kearny Foundation of Soil Science (Kearny, 1996) reported that the mean concentration of thallium in soil samples collected from 50 locations throughout California was 13.8 mg/kg. An Analysis of Background Distribution of Metals in Soils at the Lawrence Berkeley National Laboratory (LBNL; LBNL, 2009) reported that, from 1,398 soil samples collected, thallium ranged in concentrations from 0.16 mg/kg to 20 mg/kg with a 99th percentile concentration of 10 mg/kg. Therefore, the laboratory reporting limit range for thallium (0.97 to 3.0 mg/kg) is considered to be within the naturally occurring background range.

Samples with total metal concentrations that exceeded 10 times the STLC value and 20 times the TCLP value were analyzed for STLC, TCLP, and pH. Metals identified in samples with total concentrations indicating that further analysis pursuant to the WET include antimony, arsenic, barium, cadmium, chromium, copper, lead, nickel, mercury, and zinc. Metals identified in samples with total concentrations indicating further analysis pursuant to the TCLP consisted of arsenic, barium, chromium, lead, and mercury.

All Title 22 Metals results including STLC, TCLP, and pH, are shown on Table 3 and select Title 22 Metals results are shown on Figure 6.

4.3.2 TPHs

TPHg was detected at or above the laboratory reporting limit in 10 of 165 samples at concentrations ranging from 1.6 mg/kg in SB-24-9.5 to 1,700 mg/kg in SB-6-5. TPHg exceeded the SFBRWQCB ESL of 460 mg/kg in only one sample, SB-6-5. The maximum concentration of 1,700 mg/kg correlates to the elevated PID reading of 48 ppm observed in SB-6-5.

TPHd was detected at or above the laboratory reporting limit in 65 of 164 samples at concentrations ranging from 10 mg/kg in SB-1-0.5, SB-24-7, and SB-40-0.5 to 3,200 mg/kg in SB-29-10. TPHd exceeded the SFBRWQCB ESL of 200 mg/kg in 15 samples.

TPHmo was detected at or above the laboratory reporting limit in 72 of 164 samples at concentrations ranging from 20 mg/kg in SB-26-5 to 6,000 mg/kg in SB-29-10. No samples had TPHmo concentrations exceeding the SFBRWQCB ESL of 12,000 mg/kg.

TPH results are presented in Table 4 and TPHg and TPHd results are presented in Figure 7.

4.3.3 VOCs

Acetone, benzene, trichloroethene (TCE), 4-methyl-2-pentanone, toluene, ethylbenzene, isopropylbenzene, tert-butylbenzene, 1,2,4-trimethylbenzene, sec-butylbenzene, para-isopropyl toluene, n-butylbenzene, 2-butanone (or methyl ethyl ketone [MEK]), and naphthalene were detected in some soil samples collected during this PEA investigation, but none of these detections exceed their respective DTSC SL or EPA RSL. All detected VOCs are shown on Table 5.

4.3.4 PAHs

1-methylnaphthalene, 2-methylnaphthalene, naphthalene, fluorene, phenanthrene, anthracene, fluoranthene, pyrene, benzo(a)anthracene, chrysene, benzo(b)fluoranthene, benzo(k)fluoranthene, benzo(a)pyrene (BaP), indeno(1,2,3-cd)pyrene, dibenz(a,h)anthracene, and benzo(g,h,i)perylene were detected in soil samples collected during this investigation. Of these, benzo(b)fluoranthene (1.6 mg/kg), BaP (1.7 mg/kg), indeno(1,2,3-cd)pyrene (1.1 mg/kg), and dibenz(a,h)anthracene (0.210 mg/kg) were

detected at or above their respective DTSC SLs of 1.1 mg/kg, 0.11 mg/kg, 1.1 mg/kg, and 0.028 mg/kg, respectively, in sample SB-10-9. All detected PAHs are shown on Table 6.

4.3.5 OCPs

4,4'-DDT, 4,4'-DDD, and chlordane were each detected in 1 out of 29 samples at concentrations of 0.015 mg/kg, 0.014 mg/kg, and 0.3 mg/kg, respectively. No OCP detections exceed DTSC SLs. All detected OCPs are shown on Table 7.

4.3.6 PCBs

Aroclor-1248 and Aroclor-1268 were each detected in 1 out of 29 samples at concentrations of 0.140 mg/kg and 0.071 mg/kg, respectively. Aroclor-1260 was detected in 2 out of 29 samples at concentrations of 0.068 mg/kg and 0.098 mg/kg. No PCB detection exceed DTSC SLs. PCBs results are shown on Table 7.

4.3.7 Dioxins

Various dioxins were detected in all 53 of the samples analyzed for dioxins. DTSC dioxin SLs are based on 2,3,7,8-tetrachlorodibenzo-p-dioxin (2,3,7,8-TCDD) and total hexachlorodibenzo-p-dioxin (Total HxCDD). 2,3,7,8-TCDD was detected in 10 out of 53 samples at concentrations ranging from estimated (J flagged) concentration of 0.364 J picograms per gram (pg/g) in LSS-6 to 16.8 pg/g in SB-40-5. Only the sample SB-40-5 exceeds the DTSC SL of 4.8 pg/g. Total HxCDD was detected in 50 out of 53 samples at concentrations ranging from estimated concentration of 0.116 J pg/g in SB-39-0.5 to 2,180 pg/g in SB-22-10. Samples SB-13-1.5, SB-22-10, SB-33-8.5, SB-36-7, SB-40-5, SB-43-0.5, SB-44-0.5, SS-3, LSS-4, and LSS-9 exceed the DTSC SL of 100 pg/g. Dioxin toxic equivalency (TEQ) ranged from 0.00142 pg/g in SB-3-10 to 147 pg/g in SB-13-1.5. The TEQ for samples SB-13-1.5, SB-22-10, and SB-40-5 exceed the DTSC residential soil remedial goal of 50 pg/g (DTSC, 2017). Dioxin results are presented on Table 8 and shown on Figure 8.

4.3.8 Asbestos

Asbestos was analyzed in three samples collected from suspected burned waste and from four surface samples along Ryan Creek. No asbestos was detected in any of the samples. Asbestos results are presented on Table 9.

4.4 Grab-Groundwater Analytical Results

Grab-groundwater analytical results from the unfiltered samples were compared to California maximum contaminant levels (MCLs) presented in DTSC's HHRA Note Number 3 (DTSC, 2025b) and EPA MCLs when MCLs are not presented in DTSC's HHRA Note Number 3. TPH results were compared to SFBRWQCB ESLs.

4.4.1 Title 22 Metals

No antimony, selenium, or thallium were detected in any of the grab-groundwater samples. The laboratory reporting limits for antimony and thallium were 40 micrograms per liter (µg/L) and 50 µg/L, which are greater than the California MCL of 6 µg/L and EPA MCL of 2 µg/L, respectively. Therefore, it is possible that antimony and thallium are present at concentrations greater than the MCL but were not reported by the laboratory. Molybdenum and silver were detected in three out of seven and two out of seven grab-groundwater samples, respectively. No molybdenum and silver concentrations exceed their respective EPA RSLs. Title 22 Metal results are presented in Table 10 and select metals that exceed screening levels are shown on Figure 9.

Arsenic

Arsenic was detected in all of the grab-groundwater samples at concentrations ranging from 11 µg/L in GW-1 to 190 µg/L in GW-4. All arsenic concentrations exceed the California MCL of 10 µg/L.

Barium

Barium was detected in all of the grab-groundwater samples at concentrations ranging from 1,600 µg/L in GW-2 to 5,500 µg/L in GW-5. All barium concentrations exceed the California MCL of 1,000 µg/L.

Beryllium

Beryllium was detected in four out of seven grab-groundwater samples at concentrations ranging from 2.0 µg/L in GW-2 to 16 µg/L in GW-4. Beryllium did not exceed the California MCL of 4 µg/L with the exception of GW-4.

Cadmium

Cadmium was detected in three out of seven grab-groundwater samples at concentrations ranging from 7.7 µg/L in GW-4 to 39 µg/L in GW-5. The detected cadmium concentrations exceed the California MCL of 5 µg/L.

Chromium

Chromium was detected in all of the grab-groundwater samples at concentrations ranging from 30 µg/L in GW-1 to 1,000 µg/L in GW-4. All chromium concentrations except GW-1 exceed the EPA MCL of 100 µg/L.

Cobalt

Cobalt was detected in all of the grab-groundwater samples at concentrations ranging from 12 µg/L in GW-1 to 260 µg/L in GW-4. All cobalt concentrations exceed the EPA MCL of 6 µg/L.

Copper

Copper was detected in all of the grab-groundwater samples at concentrations ranging from 48 µg/L in GW-1 to 1,800 µg/L in GW-5. Copper did not exceed the EPA MCL of 1,300 µg/L except in GW-5.

Lead

Lead was detected in all of the grab-groundwater samples at concentrations ranging from 30 µg/L in GW-1 to 5,300 µg/L in GW-5. All lead concentrations exceed the EPA MCL of 10 µg/L.

Mercury

Mercury was detected in four out of seven grab-groundwater samples at concentrations ranging from 1.4 µg/L in GW-3 to 3.9 µg/L in GW-5. All mercury concentrations exceed the California MCL of 2µg/L except in GW-3.

Nickel

Nickel was detected in all of the grab-groundwater samples at concentrations ranging from 39 µg/L in GW-1 to 1,200 µg/L in GW-4. All nickel concentrations, except GW-1, exceed the California MCL of 100 µg/L.

Vanadium

Vanadium was detected in all of the grab-groundwater samples at concentrations ranging from 23 µg/L in GW-6 to 940 µg/L in GW-4. Vanadium did not exceed the EPA MCL of 86 µg/L except in GW-2, GW-4, and GW-5.

Zinc

Zinc was detected in all of the grab-groundwater samples at concentrations ranging from 110 µg/L in GW-1 to 7,800 µg/L in GW-5. Zinc did not exceed the EPA MCL of 6,000 µg/L except in GW-5.

4.4.2 TPHs

TPHg was detected in six out of seven grab-groundwater samples at concentrations ranging from 54 µg/L in GW-1 to 170 µg/L in GW-5. Only the TPHg concentration in GW-5 exceeds the SFBRWQCB ESL of 100 µg/L. TPHd was detected in all of the grab-groundwater samples at concentrations ranging from 140 µg/L in GW-1 to 1,900 µg/L in GW-3. All TPHd concentrations exceed the SFBRWQCB ESL of 100 µg/L. TPH grab-groundwater results are presented on Table 11 and shown on Figure 10.

4.4.3 VOCs

Methyl tertiary butyl ether (MTBE), TCE, chlorobenzene, and 1,4-dichlorobenzene were each detected in at least one grab-groundwater sample. All concentrations are below the DTSC or EPA MCL. No other VOCs were detected in any grab-groundwater samples. All detected VOCs are presented on Table 11.

4.5 Surface Water Analytical Results

Surface analytical results from the three unfiltered surface water samples collected were compared to California MCLs presented in DTSC's HHRA Note Number 3 (DTSC, 2025b) and EPA MCLs when MCLs are not presented in DTSC's HHRA Note Number 3. TPH results were compared to SFBRWQCB ESLs.

4.5.1 Title 22 Metals

No antimony, arsenic, beryllium, cadmium, cobalt, mercury, molybdenum, selenium, silver, or thallium were detected at or above laboratory reporting limits in any of the surface water samples collected. The laboratory reporting limits for antimony and thallium were above the DTSC MCLs. Therefore, it is possible these metals are present at concentrations greater than the MCL but were not reported by the laboratory. Barium, chromium, copper, nickel, vanadium, and zinc were each detected in at least one water sample, but all concentrations are below respective DTSC or EPA MCLs. Lead was only detected in sample SW-1 at a concentration of 22 µg/L, which exceeds the EPA MCL of 10 µg/L. Title 22 Metals results for surface water samples are presented in Table 10 and shown on Figure 10.

4.5.2 TPHs

No TPHg was detected in any surface water samples collected. TPHd was detected in surface water samples SW-1 and SW-2 at concentrations of 170 µg/L and 100 µg/L, respectively. Both of these concentrations exceed the SFBRWQCB ESL of 100 µg/L. TPH surface water results are presented in Table 11 and shown on Figure 10.

4.5.3 VOCs

No VOCs were detected in any of the surface water samples collected, and all laboratory reporting limits are below DTSC and EPA MCLs.

4.6 Soil Vapor Analytical Results

4.6.1 Fixed Gases

Oxygen was detected in all soil vapor samples at concentrations ranging from 0.54% in VP-9 to 16% in VP-6.

Carbon dioxide was detected in all soil vapor samples at concentrations ranging from 2.6% in VP-6 to 30% in VP-9.

As expected, methane gas, a natural byproduct of decomposing landfill materials and Bay Mud, has been detected at varying concentrations in soil vapor samples at depth across the site but not at explosive levels (i.e., all methane concentrations analyzed by the laboratory were either below the lower explosive limit [LEL] or above the upper explosive limit [UEL]). To ensure that explosive levels of methane do not accumulate in an enclosed space, methane detection monitors that continuously monitor indoor air concentrations have been installed in all school buildings. To date, no exceedances have been detected, and the monitoring systems are regularly inspected by the LEA.

Methane was detected in all soil vapor samples except for VP-1-5, at concentrations ranging from 0.0012% in VP-7-5 to 80% in VP-11. Results indicate that methane concentrations in soil vapor are either less than the LEL of 5% or greater than the UEL of 15%. Results for fixed gases are presented on Table 12.

4.6.2 TPHg

TPHg was detected in soil vapor samples VP-5, VP-9, and VP-11 at concentrations ranging from 18,000 micrograms per cubic meter (µg/m^3) in VP-9 to 53,000 µg/m^3 in VP-11. TPHg

detections in VP-5 (30,000 µg/m^3) and VP-11 (53,000 µg/m^3) exceed the residential SFBRWQCB ESL of 22,000 µg/m^3 when an AF of 0.03 is applied[7].

TPHg results and applicable screening levels are presented in Table 12 and shown on Figure 11.

4.6.3 VOCs

Benzene, toluene, ethylbenzene, m,p-xylene, o-xylene, TCE, 1,2-dichloroethane (1,2-DCA), vinyl chloride, acetone, carbon disulfide, chlorobenzene, cumene, cyclohexane, chloroform, freon 11, freon 114, freon 12, heptane, hexane, naphthalene, propylbenzene, styrene, MEK, 2-propanol, 4-ethyltoluene, 1,1,1-trichloroethane, 1,2,4-trimethylbenzene, 1,3,5-trimethylbenzene, 1,4-dichlorobenzene, and 2,2,4-trimethylpentane were detected in soil vapor samples collected during the July 2025 sampling event. Of these, benzene, ethylbenzene, and naphthalene exceed the residential DTSC SL or EPA RSL when a default AF of 0.03 is applied.[8] VOCs detected at or above their respective SLs are summarized below in Table 4-2.

7 Petroleum hydrocarbons are much less persistent than other COPCs due to their susceptibility to biodegrade in the presence of oxygen referred to as a bioattenuation zone. As described in Attachment 2 of CalEPA's VI Guidance, oxygen concentrations less than 1% indicate no bioattenuation zone, concentration between 1% and 4% indicated a weak bioattenuation zone, and concentrations greater than 4% indicate a strong bioattenuation zone. Oxygen concentrations in six of the soil vapor samples indicate there may be at least a weak bioattenuation zone beneath a majority of the Site. However, as a conservative evaluation, the potential for a bioattenuation zone beneath the Site is not relied upon.

8 Screening levels for soil vapor were calculated by conservatively applying the default attenuation factor (AF) to the indoor air screening levels. The default AF of 0.03 is meant to be used for the initial screening of sites, as indicated in CalEPA's February 2023 Final Draft Supplemental Guidance: Screening and Evaluating Vapor Intrusion (CalEPA, 2023).

Table 4-2: VOCs in Soil Vapor at or above Residential Screening Level			
Sample ID	**VOCs Detected**	**Concentration (µg/m³)**	**Screening Criteria (µg/m³)**
VP-9	Benzene	6.2	3.2 (DTSC RSL)
VP-11	Benzene	17	3.2 (DTSC RSL)
VP-11	Ethylbenzene	270	37 (EPA RSL)
VP-11	Naphthalene	7.2	2.8 (EPA SL)

Notes:
µg/m³ = micrograms per cubic meter
Screening criteria provided was calculated by applying a default AF of 0.03.

All detected VOCs and applicable screening levels are presented in Table 12 and select VOCs are shown on Figure 11.

4.6.4 Leak Detection

The DTSC Advisory allows for a maximum 5% leakage of ambient air into a sample container before the results are considered to be compromised (DTSC, 2015a). No helium was detected in soil vapor samples. Therefore, the soil vapor data are considered valid and usable for decision making purposes. Helium concentrations are shown on Table 12.

4.7 Sub-Slab Vapor Analytical Results

4.7.1 Fixed Gases

Oxygen was detected in all sub-slab vapor samples at concentrations ranging from 14% in SSP-4 to 22% in SSP-10 and SSP-11.

Carbon dioxide was detected in nine of the sub-slab vapor samples at concentrations ranging from 0.22% in SSP-2 to 1.4% in SSP-5 and SSP-8.

Methane was detected in three of the sub-slab vapor samples at concentrations of 0.00022% in SSP-7, 0.0015% in SSP-10, and 0.0016% in SSP-11. Results indicate that methane concentrations in sub-slab vapor are significantly below the LEL of 5%, demonstrating that there is no explosion risk below the building footprint. Results for fixed gases are presented on Table 12.

4.7.2 TPHg

No TPHg was detected at or above laboratory reporting limits in any of the sub-slab vapor samples. All reporting limits were below the residential SFBRWQCB ESL of 22,000 µg/m^3 when an AF of 0.03 is applied.

TPHg results and applicable screening levels are presented in Table 12 and shown on Figure 11.

4.7.3 VOCs

Benzene, toluene, ethylbenzene, m,p-xylene, o-xylene, PCE, 1,2-DCA, vinyl chloride, acetone, carbon disulfide, cyclohexane, chloroform, freon 12, ethanol, heptane, hexane, styrene, tetrahydrofuran, MEK, 2-propanol, 4-ethyltoluene, 4-methyl-2-pentanone, 1,2,4-trimethylbenzene, 1,2-dichlorobenzene, 1,4-dioxane, and 2,2,4-trimethylpentane were detected in sub-slab vapor samples. Of these, benzene, 1,2-DCA, and vinyl chloride slightly exceeded the residential DTSC SL or EPA RSL when a default AF of 0.03 is applied.[9] VOCs detected at or above their respective SLs are summarized below in Table 4-3.

Table 4-3: VOCs in Sub-Slab Vapor at or above Residential Screening Level

Sample ID	VOCs Detected	Concentration (µg/m^3)	Screening Criteria (µg/m^3)
SSP-7	Benzene	6.0	3.2 (DTSC RSL)
SSP-7	1,2-DCA	8.5	3.7 (EPA RSL)
SSP-7	Vinyl Chloride	0.37	0.32 (DTSC SL)

Notes:
µg/m^3 = micrograms per cubic meter
Screening criteria provided was calculated by applying a default AF of 0.03.

[9] Screening levels for soil vapor were calculated by conservatively applying the default attenuation factor (AF) to the indoor air screening levels. The default AF of 0.03 is meant to be used for the initial screening of sites, as indicated in CalEPA's February 2023 Final Draft Supplemental Guidance: Screening and Evaluating Vapor Intrusion (CalEPA, 2023).

All detected VOCs and applicable screening levels are presented in Table 12 and select VOCs are shown on Figure 11.

4.7.4 Leak Detection

The DTSC Advisory allows for a maximum 5% leakage of ambient air into a sample container before the results are considered to be compromised (DTSC, 2015a). Helium was detected in sub-slab vapor sample SSP-7 at a concentration of 0.78%, which equates to less than 5% of the average helium concentration in the shroud during sampling. No helium was detected in any other sub-slab vapor sample. Therefore, the soil vapor data are considered valid and usable for decision making purposes. Helium concentrations are shown on Table 12.

4.8 Data Quality

The analytical data obtained from the sampling events presented in this PEA Report were assessed according to QA/QC procedures to ensure the data met the requirements for their intended use and that the sampling, analysis, and reporting activities provide data that are accurate, precise, representative, and legally defensible. Ninyo & Moore reviewed Enthalpy's and Eurofins' analytical reports in accordance with the EPA National Functional Guidelines for Superfund Organic and Inorganic Methods Data Review (EPA, 2017a and 2017b). Enthalpy and Eurofins prepared and analyzed method blank (MB) samples, laboratory control samples/laboratory control sample duplicates (LCS/LCSD), and matrix spikes/matrix spike duplicates (MS/MSD) in accordance with their internal QC procedures. QA/QC data are presented in Appendix I.

In accordance with the QA/QC review, some analytical results were qualified as estimated concentrations as noted in this section. These estimated analytical results are denoted with a "J" flag on Tables 3, 4, 5, 8, 11, and 12. Estimated analytical results with a potentially biased-high concentration are denoted with a "J+" flag and estimated analytical results with a potentially biased-low concentration are denoted with a "J-" flag.

Except for the soil vapor data from December 2024, which was not considered due to uncertainty regarding the results, no data were rejected during this data validation. The relevant QA/QC results were satisfactory and acceptable. Outstanding issues were not identified during the course of the data validation review. Overall, the presented data are reliable and useable for project decision making. A summary of the review is provided below and in Table I-1 of Appendix I.

4.8.1 Chains of Custody

Samples were transported to the laboratory under appropriate chain-of-custody documentation, and each chain of custody is provided as an attachment in the respective laboratory analytical report (in Appendix G).

4.8.2 Method Blanks

Chromium was detected in the MB sample for batch 355440. 1,4-dichlorobenzene, alpha-chlorotoluene, and naphthalene were detected in Eurofins MB. All analytes detected in the MBs were not detected in the project samples, therefore, no qualifiers were added to the project sample results.

4.8.3 Laboratory Control Samples/Laboratory Control Sample Duplicates

High recovery was observed of benzo(a)pyrene in CCV for LCS for batch 355646, thallium in CCV for LCS for batch 356016, and thallium in CCV for LCS for batch 356028. However, all associated recoveries in the LCS' were within limits, therefore, no qualifiers were added to the project sample results.

4.8.4 Surrogate Recoveries

All samples submitted for analysis were spiked with the appropriate number of surrogate compounds prior to sample analysis. Surrogate recoveries were assessed against the control limits. Several high surrogate recoveries were observed in groundwater and soil samples. If the affected analytes were not detected in project samples, no qualifiers were added. If affected analytes were detected in the project samples, a "J+" qualifier was added. Low surrogate recoveries were observed for VOCs in SB-12-6, SB-14-6.5, and SB-18-6. VOCs were not detected in the three samples, therefore, no qualifiers were added.

4.8.5 Matrix Spikes/Matrix Spike Duplicates

The MS/MSD samples were spiked with the analytes of interest. Several project samples were observed with high and low percent recoveries for various analytes, primarily antimony and barium. A post-digestion spike was performed on all MS/MSD samples not meeting associated control limits. The post-digestion spike met the associated control limits for all samples. Furthermore, the LCS and associated RPD for each sample was within associated control limits. Therefore, for project samples that were non-detect, no qualifier was added. For project samples detected with the analyte exceeding MS/MSD percent recoveries, a "J" qualifier was added.

4.8.6 Duplicate Samples

Thirteen soil, one groundwater, and one soil vapor, and one sub-slab vapor sample pairs were collected. RPDs were calculated between the primary/duplicate sample pairs, and the calculations are presented on Tables I-2 through I-8 in Appendix I. Due to the heterogeneous subsurface at the Site, an RPD threshold of 100% was utilized. Twelve soil sample pairs were analyzed for Title 22 Metals, ten were analyzed for TPHs and VOCs, nine were analyzed for PAHs, and three were analyzed for OCPs and PCBs. Calculated RPDs were below the 100% threshold except for TPHd in SB-26-2/DUP-10, antimony in SB-39-5/DUP-13, arsenic in SB-32-11/DUP-11 and SB-39-5/DUP-13, barium in SB-3-15/DUP-01, SB-32-11/DUP-11, copper in SB-14-2.5/DUP-07, SB-32-11/DUP-11, and SB-39-5/DUP-13, nickel in SB-14-2.5/DUP-07, mercury in SB-10-2.5/DUP-05 and SB-39-5/DUP-13, vanadium in SB-39-5/DUP-13 and zinc in SB-14-2.4/DUP-07 and SB-32-11/DUP-11.

All groundwater, soil vapor (from July 2025), and sub-slab vapor sample pairs were below the 100% threshold.

4.8.7 Flagged Data Discussion

Samples analyzed for hexavalent chromium were analyzed outside of hold time of 28 days for EPA Method 7199. An exceeded hold time can cause biased high or biased low concentrations depending on chemical. Since hexavalent chromium is not classified as a volatile compound and the soil sample pH was relatively neutral, it is likely the exceeded hold time has not caused a degradation of hexavalent chromium and the detected concentrations are reliable and useable for project decision making. However, due to the uncertainty associated with the exceeded hold time hexavalent chromium results are flagged with an “H” to denote the hold time was exceeded and a “J” to denote the concentration is an estimate.

Samples qualified with a “J+” indicate a potentially biased-high estimated concentration, meaning concentrations may be lower than reported results. These samples provide a conservative estimation and therefore, were used for project decision making.

4.9 Uncertainty

Some COPCs were not detected above the laboratory reporting limits in soil and groundwater samples; however, because the reporting limits were higher than residential SLs, there is some uncertainty as to whether these COPCs may be present at low concentrations slightly above the residential SLs.

In soil, the laboratory reporting limit for thallium was greater than the EPA RSL of 0.78 mg/kg in a majority of the samples. While thallium was only detected above the laboratory reporting limit in one soil sample, it is theoretically possible that thallium is present at the Site at concentrations greater than the EPA RSL but less than the laboratory reporting limit. The laboratory reporting limit range for thallium (0.97 to 3.0 mg/kg) is considered to be within the naturally occurring background range of 10 to 13.8 mg/kg.

The reporting limits for 1-methylnaphthalene, naphthalene, benzo(a)anthracene, benzo(b)fluoranthene, benzo(k)fluoranthene, benzo(a)pyrene, indeno(1,2,3-cd)pyrene, and dibenz(a,h)anthrancene were greater than the DTSC SLs in several samples. However, a majority of the samples with laboratory reporting limits that were below the DTSC SLs were “non-detect.” Therefore, it is likely that these PAHs are not present in those samples that had reporting limits that exceeded the DTSC SLs.

In groundwater and surface water, the reporting limits for antimony and thallium were greater than their respective residential SLs in all samples. Therefore, antimony and thallium may be present in groundwater and surface at the Site at concentrations greater than their residential SLs but below their laboratory reporting limits.

5 CONCEPTUAL SITE MODEL

A general schematic summarizing the CSM is included as Figure 19. The CSM details are discussed below.

5.1 Contaminants of Potential Concern and Potential Sources

To evaluate COPCs, the PEA data was compared to DTSC SLs (DTSC, 2025b) and/or EPA RSLs (EPA, 2024); TPH data was compared to SFBRWQCB ESLs. To ensure a conservative evaluation, constituents that exceed applicable residential SLs are considered COPCs. The analytical results indicate that COPCs in soil include antimony, arsenic, cadmium, hexavalent chromium, cobalt, copper, lead, mercury, thallium, zinc, TPHg, TPHd, benzo(b)fluoranthene, BaP, indeno(1,2,3-cd)pyrene, dibenz(a,h)anthracene, and dioxins. COPCs in groundwater and surface water include arsenic, barium, beryllium, cadmium, chromium, cobalt, copper, lead, nickel, mercury, vanadium, zinc, TPHg, and TPHd. COPCs in soil vapor include TPHg, benzene, ethylbenzene, 1,2-DCA, vinyl chloride, naphthalene, and methane.

The likely source of the majority of these COPCs include the historical use of the Site as a burn dump from the early 1900s to the 1950s. As is the case with samples collected from the landfill

waste prism at the Site, it is common for elevated concentrations of Title 22 Metals to be found at landfills and burning debris is a known source for dioxins. The historical waste-burning practices at the Site are not well documented. Waste may have been burned without additional fuel sources or with added fuel sources. It is possible that the TPH constituents detected at the Site are associated with past burning activities and/or disposal of TPH-containing materials.

Due to shallow groundwater conditions at the Site, it is likely COPC impacts to groundwater (primarily metals) originate from COPCs in impacted/landfill soil leaching into the groundwater.

Ninyo & Moore considered the potential for off-Site sources to impact the Site. A review of GeoTracker to search for various types of closed and active environmental cases (including leaking underground fuel tanks [LUFT], DTSC cleanup sites, military cleanup sites, land disposal sites, waste discharge sites, etc.) was performed. The review indicates there are 14 documented sites within a 0.5-mile radius of the Site. Thirteen of these sites have received regulatory closure and one is a site impacted by a dry-cleaning operation. The associated TPH-impacted groundwater plumes have been adequately delineated and concentrations reduced to below applicable case closure screening criteria. The distance from these closed cases to the Site, delineation of groundwater plumes, and reduction in TPH concentrations make it unlikely that these off-Site properties may be contributing to COPCs detected at the Site. The remaining site is an active case involving a dry-cleaning facility associated with chlorinated solvent contamination. These COPCs are inconsistent with those detected at the Site, making this an unlikely potential off-Site source.

One off-Site source that may potentially be contributing to Site COPCs is a former 550-gallon waste oil underground storage tank (UST) located at the Sewerage Agency of Southern Marin to the south of the Site. The UST was removed in November 2005. Investigations performed at the time identified elevated levels of TPHg, TPHd, and TPHmo in soil and groundwater, but a subsequent investigation in 2007 did not identify TPHs (EC&A, 2007). Although the Sewerage Agency UST may be a potential source of TPH impacting the Site, the lateral distribution of TPH concentrations in groundwater across the Site and the fact that the maximum concentrations were detected in the northern and central portions of the Site indicate that the Sewerage Agency UST is unlikely to be a significant contributing factor to Site impacts. Rather, TPHd concentrations detected in groundwater at the Site are more likely attributable to historical Site operations.

COPC impacts to soil vapor are likely sourced from COPC-impacted soil above the water table from historical dump operations. The source of methane may potentially originate from organic

material within the waste and from the underlying Bay Mud, which is a known natural source of methane.

5.2 Impacted Media

COPCs have been detected in soil, groundwater, surface water, and soil vapor.

5.3 COPC Distribution in Soil

COPCs appear to be heterogeneously distributed across the Site at various depths. The COPCs are generally limited to the landfill waste, with a few exceptions of metals and TPHs in the southwest corner of the Site where no waste was observed. Select metals, TPHs, and dioxins exceeding their respective SLs are presented in Figures 6 through 8. Additionally, lead concentrations are presented on cross-sections on Figures 13 through 18.

5.3.1 Title 22 Metals

Title 22 Metals above applicable SLs appear to be heterogeneously distributed laterally and vertically in landfill waste across the Site. Metal concentrations above SLs appear to extend laterally from Site boundary to Site boundary and are delineated vertically by Bay Mud. Maximum concentrations of metals are primarily detected from approximately 5 to 10 feet bgs in samples collected from the waste. Lead, arsenic, and mercury are the predominant metals detected at the Site, with lead being the most frequently detected and with the highest concentrations. Elevated concentrations of other metals are generally accompanied with an elevated concentration of lead.

5.3.2 TPHs

TPHg is only detected above the SFBRWQCB ESL of 460 mg/kg in the southwest corner of the Site at 5 feet bgs.

TPHd appears to be predominantly located in the center of the Site within the top 2.5 feet bgs but is detected above SLs at depths of up to 10 to 12 feet in the central-eastern portion of the Site in two samples. Generally, elevated TPH concentrations are located in fill material near the surface or within the top two feet of waste.

5.3.3 PAHs

Benzo(b)fluoranthene, BaP, indeno(1,2,3-cd)pyrene, and dibenz(a,h)anthracene concentrations at or above the DTSC SL are present in SB-10 at 9 feet bgs, located south of

Ryan Creek along the northern Site boundary. No PAHs were detected at or above residential SLs in samples collected from the burned waste layer on the east side of the Site.

5.3.4 Dioxins

Dioxin concentrations detected above the DTSC SL and remediation goal appear to be heterogeneously distributed laterally and vertically at the Site with depths ranging from surface samples along the creek bank and in two of the sampled landscape areas (LSS-4 and LSS-9) to approximately 10 feet bgs in the center of the Site. Elevated dioxin concentrations were primarily detected in samples collected from the waste and correlate with elevated metal concentrations. Dioxin concentrations were detected above the DTSC SL in three of the seven samples (SB-22, SB-33, and SB-36) collected from the burned waste layer on the east side of the Site.

5.4 COPC Distribution in Groundwater and Surface Water

TPHg, TPHd, and select metals detected above MCLs are presented in Figures 9 and 10.

5.4.1 Title 22 Metals

Arsenic, barium, cobalt, and lead were each detected above DTSC or EPA MCLs in all grab-groundwater samples collected. Maximum concentrations for Title 22 Metals were detected in either GW-4 located along the southern Site boundary (SB-18), GW-5 located to the east of the gymnasium (SB-28), or GW-6 located in the northeast corner of the Site (SB-39). Each of these grab-groundwater locations is in the vicinity of the maximum detected concentrations in soil samples. Lead was the only metal detected in the surface water samples collected from Ryan Creek and was only detected in SW-1 at a concentration of 22-µg/L. The location of SW-1 was located at the western extent of Ryan Creek near the culvert traversing under Camino Alto. No other metals were detected in surface water samples from Ryan Creek.

5.4.2 TPHs

TPHg was only detected above the SFBRWQCB ESL of 100 µg/L in grab-groundwater sample GW-5 and appears to be delineated to the north by GW-6, to the southwest by GW-4, and to the west by GW-3. No TPHg was detected in any of the surface water samples from Ryan Creek.

TPHd was detected above the SFBRWQCB ESL of 100 µg/L in all of the grab-groundwater samples collected with a maximum concentration of 1,900 µg/L in GW-3. TPHd was detected

above or equal to the SFBRWQCB ESL in surface water samples SW-1 and SW-2. No TPHd was detected in SW-3 located at the eastern extent of Ryan Creek near the flood gate and pump house.

5.5 COPC Distribution in Soil Vapor and Sub-Slab Vapor

Select COPCs detected in soil vapor and sub-slab vapor are presented on Figure 11. As described above, an AF of 0.03 was conservatively used in accordance with the CalEPA VI Guidance.

5.5.1 TPHg

TPHg was detected above the residential SFBRWQCB ESL of 22,000 µg/m^3 in soil vapor samples collected from 5 feet bgs in the northern portion of the Site (VP-5), and in the soil vapor sample collected 2.5 feet bgs in the northeast corner of the Site (VP-11). No TPHg was detected in any of the sub-slab vapor samples, including sub-slab vapor pin SSP-9 located nearest to VP-5. The highest TPHg concentration was detected in VP-11, which is located beneath an outdoor asphalt area and not near any school buildings.

5.5.2 VOCs

Benzene was detected above the calculated DTSC SL of 3.2 µg/m^3 in soil vapor samples collected from the top 5 feet bgs on the east side of the Site (VP-9) and from the northeast corner of the Site (VP-11). Ethylbenzene and naphthalene were also detected above the SLs in the northeast corner of the Site (VP-11). Benzene concentrations above the DTSC SL in soil vapor probe VP-9 were not detected in the nearest sub-slab vapor pin, SSP-11, located in the southeast corner of the gymnasium. The highest benzene, ethylbenzene, and naphthalene concentrations were detected in VP-11, located beneath an outdoor asphalt area and not near any school buildings.

Benzene, 1,2-DCA, and vinyl chloride were detected slightly above the DTSC SLs in one sub-slab vapor sample (SSP-7) located in the southeast corner of the main school building. No benzene, 1,2-DCA, or vinyl chloride concentrations were detected at or above the DTSC SL in either of the nearest soil vapor probes, VP-6 and VP-7.

5.5.3 Methane

Methane was detected in soil vapor probes at concentrations ranging from 0.0012% in the middle of the Site to 80% in the northeast corner of the Site. No elevated methane concentrations were detected in any sub-slab vapor samples.

5.6 Factors Related to Soil Pathway

The Site is located in a mixed residential and commercial/industrial area on a portion of the former Mill Valley Dump and is currently developed with the MVSD administrative building and Mill Valley Middle School. It includes a large building on the west side of the Site and smaller buildings and portable classrooms on the eastern and northern portions of the Site. The large building consists of MVSD offices and a library on the first floor, and classrooms on the second floor. School parking lots are located along the southern and eastern Site boundaries, as well as a skate park in the southeast corner and a blacktop play area in the northeast corner of the Site (Figure 2). The Site surface consists of approximately 341,200 square feet of hardscape (asphalt, concrete, and buildings) and approximately 103,200 square feet of landscape areas. The Site ranges in elevation and gently slopes from approximately 15 to 17 feet amsl on the west side to approximately 7 feet amsl on the east side. Ryan Creek cuts across the northern portion of the Site oriented west to east with a top of bank elevation of approximately 7 to 8 feet amsl. The creek is fenced off to potential Site receptors. The majority of the Site is covered with hardscape (i.e., asphalt, concrete, or buildings). Landscaped areas sampled during the PEA have at least 0.5 foot of soil above landfill waste.

5.7 Factors Related to Water Pathways

The Site is situated within the Angel Island-Frontal San Francisco Bay Estuaries sub-watershed within the greater San Francisco Bay watershed (USGS, 2025a). The Site was developed in an area that is naturally tidal marsh, with tidal marshes still present to the northwest and east of the Site. Ryan Creek cuts across the northern portion of the Site and is tidally influenced. The creek receives water from the upgradient watershed drainage through a culvert located at the western end of the creek and from the Pickleweed Inlet during high tide. A tidegate and the Ryan Creek Pump Station are located at the eastern end of Ryan Creek. The creek is completely fenced off and locked to prevent unauthorized access.

Groundwater has historically been encountered at approximately 3 to 9 feet bgs (DTSC, 2003). During PEA activities, groundwater was encountered in soil borings at approximately 3 feet bgs along the eastern Site boundary and south of Ryan Creek to approximately 10 to 12 feet bgs in the center of the Site. Based on the Site's proximity to the Pickleweed Inlet and the fact that Ryan Creek is tidally influenced, it is presumed that groundwater at the Site is also tidally influenced.

The Site receives its water supply from the Marin Municipal Water District. Shallow groundwater at the Site is not currently used as a source of drinking or irrigation water and, due to the Site's

proximity to the Pickleweed Inlet and the likelihood groundwater is tidally influenced, groundwater is likely brackish and unsuitable as a water supply without treatment.

5.8 Factors Related to Air Pathways

The presence of buildings on Site and soil vapor impacted by COPCs creates a potentially complete exposure pathway for volatilization to soil vapor and indoor air. Petroleum hydrocarbons are susceptible to biodegradation and are much less persistent than other COPCs, which is indicated by the fact that TPHg concentrations were not detected in sub-slab vapor samples (immediately underneath the Site buildings) but were detected in soil vapor samples at 5 feet bgs elsewhere on Site[10].

We note that in addition to the waste, which can be an anthropogenic source of methane, Bay Mud is present, which is a known natural source of methane. Currently, all Site buildings including the main school building, administrative offices, MVSD offices, the gymnasium, and portable classrooms have automatic indoor air methane sensors installed. The locations of the methane sensors in the portable classrooms are shown on Figure 3. All methane sensors in the main school building and gymnasium were installed in accordance with the LEA-approved Methane Sensor Installation Work Plan (Ninyo & Moore, 2025a) and the sensor locations are shown on Figures 19 through 21.

6 HUMAN HEALTH RISK ASSESSMENT

An HHRA was prepared to evaluate the potential health risks that could result from exposure to contaminants at the Site. The HHRA applies conservative (health protective) assumptions to evaluate the properties of the COPCs and the ways people might be exposed to them. The objective of the HHRA is to determine whether COPC concentrations in soil and soil vapor pose a potential risk to current and future on-Site receptors, including students and staff.

The HHRA was performed in conformance with the following guidance from the EPA and the DTSC:

10 It should be noted that oxygen concentrations detected in six soil vapor samples indicate there may be at least a weak bioattenuation zone across a majority of the Site promoting biodegradation of petroleum hydrocarbons.

- DTSC, 2009. Arsenic Strategies, Determination of Arsenic Remediation Development of Arsenic Cleanup Goals. January 16 (DTSC Arsenic Strategies Guidance).
- DTSC, 2011. Final Guidance for the Evaluation and Mitigation of Subsurface Vapor Intrusion to Indoor Air.
- DTSC, 2015b. Preliminary Endangerment Assessment Guidance Manual.
- DTSC, 2022a. HHRA Note Number 4, Guidance for Screening Level Human Health Risk Assessments.
- DTSC, 2022b. HHRA Note Number 11, Southern California Ambient Arsenic Screening Level.
- DTSC, 2023. Supplemental Guidance: Screening and Evaluating Vapor Intrusion.
- DTSC, 2025a. HHRA Note Number 1, Recommended DTSC Default Exposure Factors for Use in Risk Assessment at California Hazardous Waste Sites and Permitted Facilities.
- DTSC,2025b. HHRA Note Number 3, DTSC-Modified Screening Levels.
- DTSC, 2025c. HHRA Note Number 10, Toxicity Criteria.
- EPA, 1989. Risk Assessment Guidance for Superfund: Volume I - Human Health Evaluation Manual.
- EPA, 2024. Regional Screening Levels.

As required by the EPA and DTSC, this HHRA quantitatively evaluates the potential health impacts associated with human exposure to chemicals detected in soil and soil vapor beneath the Site. This HHRA evaluates two exposure scenarios 1) current school exposure, and 2) hypothetical residential exposure. Site characterization data were compiled into a database and statistically analyzed to establish representative chemical concentrations. Then, where appropriate, environmental fate and transport models were used to estimate the concentrations of the chemicals to which human receptors might be exposed. The HHRA summary tables are included in Appendix J.

Conservative methods, models, and assumptions have been utilized during the preparation of this HHRA in accordance with the guidelines of the EPA and DTSC. For example, the HHRA evaluates residential use, which provides a more conservative risk evaluation than what would be required for the anticipated Site use. In addition, the HHRA incorporates, to the extent possible, recent improvements and refinements in the practice of risk assessment. Current regulatory guidance requires risk assessments to be health-protective in nature and will likely overestimate potential health risk at the Site based on current and future Site use. Therefore, actual risks associated with conditions evaluated in this HHRA are likely to be lower than those described herein. Conservative assumptions built into the HHRA include:

- Evaluation of hypothetical future residential scenario; which assumes residents are present 24 hours per day, 350 days per year for a total of 26 years (20 years as an adult and 6 years as a child; even though current and proposed uses are for a school;
- Calculations use maximum COPC concentrations instead of Site averages;
- Calculations assume direct exposure to COPCs without mitigation measures;
- Calculations assume COPC concentrations are constant and continuously released and ignore some fate and transport mechanisms and natural degradation; and
- The default (conservative) AF of 0.03 was used to perform vapor intrusion risk calculations.

6.1 Selection of Contaminants of Potential Concern

All chemicals detected at the Site were included in a formal selection of COPCs. The COPCs evaluated in this HHRA may differ from the COPCs listed in Section 5.1, as COPCs were discussed in Section 5.1 only if they were detected at concentrations exceeding residential screening levels. By comparison, in an effort to be conservative, the HHRA considered all constituents detected at the Site in at least one sample to be COPCs, regardless if the concentration exceeded residential screening levels. This results in an overly conservative HHRA evaluation by considering and incorporating constituent concentrations that would be considered safe under a residential exposure scenario. As described in current EPA and DTSC risk assessment guidance, including each chemical identified in at least one sample as a COPC ensures that all chemicals are quantitatively evaluated in the HHRA.

6.1.1 Organic Compounds

Organic chemicals detected at the Site included OCPs, PCBs, dioxins, PAHs, and TPH in soil and VOCs (including TPH) in soil vapor. VOCs detected included aromatic hydrocarbons and chlorinated hydrocarbons. Organic compounds detected in soil, soil vapor, and/or sub-slab vapor at concentrations above laboratory reporting limits at least once were considered to be COPCs for the Site.

The VOCs detected in soil vapor and sub-slab vapor at the Site include TPHs, chlorinated hydrocarbons, and chloroform.

6.1.2 Metals

All Title 22 Metals were detected above laboratory reporting limits in at least one soil sample and therefore were included in the risk evaluation for this HHRA.

In accordance with DTSC Arsenic Strategies Guidance (DTSC, 2009) and DTSC HERO HHRA Note Number 4 (DTSC, 2022a), potential health risk and hazard posed by arsenic and lead concentrations in soil were evaluated independently as described below.

6.2 Arsenic in Soil

The DTSC Arsenic Strategies Guidance (DTSC, 2009) states that, for arsenic, cleanup levels should be set at the background concentration. The background concentration is used to determine if there are any arsenic impacts and to determine if potential risk associated with arsenic is present.

The Site-specific soil arsenic background concentration has been determined to be 15 mg/kg (Appendix H). This Site-specific background concentration is generally consistent with DTSC-conducted studies of California soils.[11,12] Arsenic was detected at or above the Site-specific background level in 27 soil samples at concentrations ranging from 15 mg/kg to 230 mg/kg at depths ranging from 0.5 feet bgs to 15 feet bgs (Table 3). Since some arsenic concentrations exceed the Site-specific background concentration, there may be potential risk associated with arsenic in Site soil if mitigation measures are not in place. The ground surface above soil samples with arsenic exceedances consists of the landfill cover or cap (e.g., under landscaping or under a paved area), which mitigates potential direct exposure to elevated arsenic concentrations in shallow soil (0.5 to 1-foot bgs). There were no arsenic detections exceeding the Site-specific background level in surface samples and the calculated 95% upper confidence limit (95UCL) of arsenic within surface and shallow soil (0.5 to 1 foot bgs) is 10 mg/kg, which is also below the Site-specific background level.

[11] DTSC Human and Ecological Risk Office (HERO), 2022. Human Health Risk Assessment Note Number 11, Southern California Ambient Arsenic Screening Level. December 28.

[12] DTSC, 2009. Arsenic Strategies, Determination of Arsenic Remediation Development of Arsenic Cleanup Goals. January 16.

6.3 Lead in Soil

DTSC's HERO HHRA Note Number 4 (DTSC, 2022a) indicates that, for lead, concentrations should be compared to the residential DTSC SL of 80 mg/kg to evaluate if potential risk associated with lead is present. Lead was detected above the DTSC SL of 80 mg/kg in 38 soil samples at concentrations ranging from 92 mg/kg to 23,000 mg/kg at depths ranging from the ground surface to 15 feet bgs (Table 3). Since some samples exceed the soil screening level for lead, there may be potential risk associated with lead in Site soil if not mitigated. The ground surface above buried waste and the samples with the highest lead concentrations consists of the landfill cover or cap (e.g., under landscaping or under a paved area) which prevent contact with underlying soils. The calculated 95UCL of lead within surface and shallow soil (0.5-1 foot bgs) is 61 mg/kg, which is below the DTSC SL.

6.4 Exposure Assessment

6.4.1 Potential Receptors

Given the current use of the Site and potential redevelopment, and in an effort to present the most conservative evaluation of risks, potential exposures to two sets of on-Site receptors are evaluated: (1) school staff and students, and (2) hypothetical future residential receptors, as described below. The exposure assessment is based on a theoretical scenario where no protective systems, remedial action, or mitigation is in place.

School Exposure (Staff and Students): School receptors were deemed to have the potential to come in contact with chemicals that might be present in soil from 0 to 1-foot bgs, in landscape areas through the inhalation of ambient air and direct contact with soil. Ambient air may become impacted by airborne dust; therefore, the inhalation of dust is considered to be a complete exposure pathway. The incidental ingestion of and dermal contact with impacted soil is considered to be a complete exposure pathway (Figure 22). This scenario assumed students are exposed to COPCs through the exposure pathways for 6 hours per day, 180 days per year, for 3 years, and staff are exposed for 8 hours per day, 250 days per year, for 25 years. Exposure parameters for on-Site receptors for the current Site use are presented on Table J-1.

Hypothetical Residential Exposure: A residential scenario was evaluated because it provides the most conservative assessment in regards to the potential receptors and exposure timeframe. Under this scenario, future on-Site residents could include adult and child residents. The hypothetical adult and child residential receptors were deemed to have

the potential to come in contact with COPCs that might be present in soil (regardless of depth) through the inhalation of ambient air and direct contact with soil. Ambient air may become impacted by airborne dust; therefore, the inhalation of dust is considered to be a complete exposure pathway. Residents could also come in contact with soils through by conducting backyard activities such as gardening and other recreational activities. Therefore, the incidental ingestion of and dermal contact with impacted soil is considered to be a complete exposure pathway (Figure 22). This scenario assumed a person is exposed to COPCs for 24 hours per day, 350 days per year for 26 years in total (with six years as a child, and 20 years as an adult). Exposure parameters for hypothetical on-Site receptors for Site residential use are presented on Table J-2.

This HHRA assumed that a potential source of VOCs exists under the Site. It was also assumed that this potential VOC source would be infinite and in steady-state condition (i.e., not depleting) for the next 26 years even though the concentrations would likely deplete over time. The assumption that VOC vapors will migrate up to the surface and enter a building through cracks in its foundation is a conservative assumption and will result in an over-estimate of health risk. Furthermore, redevelopment of the Site will include construction of protective systems, such as sub-slab depressurization systems, which are not considered or evaluated in the HHRA. Regardless, this vapor intrusion pathway is considered a potential exposure pathway for both the school receptors and the hypothetical residential receptors (Figure 22).

The HHRA assumes that future on-Site receptors will continue to receive their drinking water from municipal sources and will not depend on groundwater wells for their water needs. Due to the Site's proximity to the Pickleweed Inlet and the likelihood that groundwater is tidally influenced, groundwater is likely brackish and unsuitable as a water supply. Ryan Creek is fenced off and locked from current Site receptors to mitigate potential direct contact with surface water in compliance with LEA requirements. Therefore, the surface water and groundwater exposure pathways are not considered to be complete exposure pathways for current or future on-Site receptors and were not considered in this HHRA.

Although off-Site residential populations located within a one-mile radius of the Site may also be potentially exposed to COPCs identified at the Site, their exposures should be substantially less than those estimated for on-Site residential receptors because of wind dispersion and dilution. Therefore, only exposure to hypothetical on-Site residents is quantitatively evaluated in this HHRA.

6.4.2 Soil and Dust Exposure Point Concentrations

Metals, OCPs, PCBs, PAHs, TPHs, and dioxins were detected in soil at the Site (Tables 3 through 9). Exposure to these chemicals may occur via inhalation of fugitive dust, incidental ingestion, and dermal contact. Inhalation exposure to non-volatile compounds is typically minor in fugitive dust when compared to direct ingestion exposure (EPA, 2002). Nevertheless, a relationship must be estimated between the chemical concentration in soil and the concentration in air due to fugitive dust emissions from surface soil.

The EPA (2002) and DTSC (2015) recommend using a particulate emission factor (PEF) to model COPC concentrations in airborne dust. The PEF represents an annual average emission rate based on wind erosion. The default PEF value for a residential exposure scenario published by the DTSC (2025a) was used in this HHRA for both the current Site use and residential exposure scenarios evaluated. The residential PEF value of 1.36E+09 cubic meters per kilogram (m^3/kg) was used to estimate dust emissions for the Site. The COPC concentration in ambient air due to dust emissions was obtained by dividing the soil COPC concentrations by the PEF. The estimated ambient air exposure point concentrations were used to estimate dust inhalation exposures for all potential receptors.

6.4.3 Vapor Inhalation of Chemicals in Indoor Air

Risk characterization involves estimating the magnitude of the potential adverse health effects that could occur due to chronic, long-term exposure to chemicals identified in soil vapor and sub-slab vapor at the Site. The risk characterization is based on the results of the dose-response (toxicity) and exposure assessment.

Chemicals may migrate through environmental media from their source to a point where human receptors may be exposed. Therefore, it was necessary to determine if the detected VOCs (given their residual concentrations, locations, soil physical characteristics, weather conditions, etc.) could potentially migrate to the surface (where human receptors may be exposed).

Screening-level models were used to predict indoor air concentrations that may result from the chemical vapors potentially released from soil vapor and sub-slab vapor under the Site. The estimated vapor flux and indoor air concentrations were then used to estimate potential health risk that may result from on-Site exposures. For purposes of this evaluation, two scenarios were evaluated: (1) use of the land as a school; and (2) hypothetical residential use.

In this evaluation, maximum concentrations detected in soil vapor (Table 12) were conservatively used as representative of chemical concentrations present in soil vapor under the Site for the Hypothetical Residential Scenario. For the School Exposure Scenario, the maximum concentrations detected in sub-slab vapor (Table 12) were used.

CalEPA's VI Guidance recommends that multiple lines of evidence be used when evaluating the potential risk and hazard posed by vapor intrusion. DTSC recommends that the indoor air chemical concentrations that can result from vapor intrusion be estimated using the following equation:

$$AF = \frac{C_{indoor}}{C_{soil\ vapor}}$$

Where:

AF = Attenuation factor (unitless)

C_{indoor} = Indoor air concentration ($\mu g/m^3$)

$C_{soil\ vapor}$ = Soil vapor concentration ($\mu g/m^3$)

Using the above equation, the indoor air chemical concentration can be estimated by multiplying the known soil vapor concentration by the AF.

For the School Exposure Scenario, the only Site-specific parameter entered into the indoor air exposure model was the ceiling height. The ceiling height in the school classrooms is approximately 13.5 feet. Default AFs were developed for buildings having a ceiling height of 8 feet. By taking into consideration the building-specific ceiling height, this vapor intrusion evaluation accounts for the increased dilution of VOCs due to the higher diluting volume of indoor air. The ventilation rate for the School Exposure Scenario was set to the default value from commercial buildings (one air exchange per hour; DTSC, 2011). Indoor air VOC concentrations estimated for the Hypothetical Residential Scenario are presented in Table J-3. Indoor air VOC concentrations estimated for the School Exposure Scenario are presented in Table J-4.

The models assume that the concentrations in indoor air are proportional to the flux throughout the soil column, and that a vapor infiltrating into the building through the foundation floor is uniformly and instantaneously mixed within the air space in the lowest

occupied floor of the building. Because this model ignores a number of possible mitigating factors, it likely over-predicts the chemical flux to indoor air. However, because of its simplicity and conservatism, this approach provides a method to estimate the likely maximum rate at which chemicals would be transported to the surface soils and into a building.

The indoor air chemical concentrations estimated to result from the volatilization of VOCs could be considered to represent a "worst-case" estimate. In the calculations, it was assumed that single chemical compounds are volatilizing, traveling alone through the vadose zone and escaping to ambient air. In reality, all chemicals detected at the Site are competing with each other for available soil-pore space. It is well known that chemical volatilization and migration is limited by the vapor saturation in the vadose zone.

6.5 Toxicity Assessment

In order to evaluate the potential adverse effects associated with exposure to COPCs, the relationship between the dose of each chemical and the incidence or potential of an adverse health effect in an exposed population must be determined. This is known as the dose-response assessment and is based on data collected from animal studies and theoretical precepts about what might occur in humans.

This HHRA considers both carcinogenic and non-carcinogenic health effects associated with chemical exposures based on dose-response criteria published by various regulatory agencies.

In this HHRA, chronic toxicity criteria were selected in accordance with the DTSC Regulation "Toxicity Criteria for Human Health Risk Assessment" (effective September 2018) (https://dtsc.ca.gov/LawsRegsPolicies/Regs/Toxicity-Criteria-for-Human-Health-Risk-Assessment). Toxicity information was obtained from the following sources in the hierarchy shown:

- DTSC HERO HHRA Note Number 10 (DTSC, 2025c);
- DTSC HERO HHRA Note Number 3 (DTSC, 2025b);
- EPA RSLs for Chemical Contaminants at Superfund Sites (EPA, 2024);
- SFBRWQCB, User's Guide: Compilation and Application of Environmental Screening Levels (ESLs) (SFBRWQCB, 2025).

6.5.1 Non-Carcinogenic Dose-Response Criteria

It is widely accepted that most biological effects of chemical substances occur only after a threshold dose is reached. For the purpose of establishing non-carcinogenic criteria levels, this threshold dose is usually derived from either the no observed adverse effect level (NOAEL) or the lowest observed adverse effect level (LOAEL), as determined in chronic animal exposure studies. The NOAEL is defined as the highest dose at which no adverse effects occur, while the LOAEL is defined as the lowest dose at which adverse effects begin to appear. NOAELs and LOAELs are used by the EPA to establish reference doses (RfDs) for acceptable levels of human intake.

A RfD is the dose of a chemical that is not expected to cause adverse health effects over a lifetime of daily exposure in the most sensitive population. Uncertainty factors are used to set RfDs, representing an attempt to account for limitations in the quality or quantity of available data. Most RfDs include a 100-fold safety factor that is based on 1) a factor of 10 to account for uncertainties in extrapolating animal data to human health effects, and 2) another 10-fold safety factor to account for differences in sensitivity within the human population. Furthermore, if an available database is incomplete, or if the involved chemical is persistent or bioaccumulative, additional 10-fold safety factors may be applied. Reference doses for chemicals detected in soil are compiled in Table J-5. Reference doses for VOCs detected in soil vapor and sub-slab vapor are summarized in Table J-6.

6.5.2 Carcinogenic Dose-Response Criteria

The currently accepted regulatory approach assumes that all potentially carcinogenic chemicals should be treated as if they do not have thresholds. This regulatory approach, which was used to evaluate carcinogenic risk for this HHRA, assumes that the dose-response curve for carcinogens allows for zero risk at zero dose (i.e., for all doses, some cancer risk is assumed to be present). Since animal testing is performed at relatively high doses for the purposes of eliciting a carcinogenic response, various mathematical models are used to estimate the theoretically plausible response at low doses. The accuracy of the projected risk depends on how well the model predicts the true relationship between dose and risk at levels where this relationship cannot actually be measured.

Health risk for exposures to carcinogens is defined in terms of probability. The probability quantifies the likelihood of a carcinogenic response in an individual that receives a given dose of a particular compound. This probability is calculated based on the potential dose and the cancer slope factor (CSF) for a chemical.

The CSF, which is expressed in units of inverse milligrams per kilogram-day $(mg/kg\text{-}day)^{-1}$, is the 95UCL of the probability of carcinogenic response per unit daily intake of a chemical over a lifetime. The CSF multiplied by the lifetime average daily intake of the chemical (dose) provides an estimate of the 95UCL of the theoretical cancer risk for the specific dose. The CSFs used in this HHRA to estimate carcinogenic risk are presented in Table J-5.

For the inhalation pathway, cancer risk is calculated based on the potential exposure concentration and the inhalation unit risk (IUR) for a chemical. The IUR, which is expressed in units of inverse micrograms per cubic meter $(\mu g/m^3)^{-1}$, is the 95UCL of the probability of carcinogenic response per unit daily exposure to a given chemical concentration over a lifetime. The IUR multiplied by the lifetime exposure concentration of the chemical provides an estimate of the 95UCL of the theoretical cancer risk for the specific chemical. The IURs used in this evaluation to estimate carcinogenic dose-assessment risk are presented in Table J-6.

In this assessment, chronic toxicity criteria were selected in accordance with the DTSC Regulation "Toxicity Criteria for Human Health Risk Assessment" (effective September 2018) (https://dtsc.ca.gov/LawsRegsPolicies/Regs/Toxicity-Criteria-for-Human-Health-Risk-Assessment). Toxicity information was obtained from the DTSC HERO HHRA Note Number 10, Toxicity Criteria (DTSC, 2025c).

6.6 Risk Characterization

Risk characterization combines information obtained in the exposure assessment and fate and transport modeling with toxicological parameters to obtain an estimate of potential health effects. Risk characterization is conducted in two distinct steps. First, quantification of the daily intake (dose) of the chemical is estimated. Intake assumptions including absorption and bioavailability factors, frequency and duration of exposure, age of receptor, body weight, and exposure rates are used to calculate the dose. The second step in the risk characterization process compares the estimated daily dose to cancer potency factors and reference doses to obtain an estimate of potential health risk and hazard.

Results of the risk characterization represent the "worst case" scenario based on maximum COPCs detected at the Site and are intended to assess the potential for risk without mitigation. Furthermore, as mentioned in Section 6.4.3, the soil vapor intrusion to indoor air risk characterization, assumes

single COPCs are volatilizing in the vadose zone and migrating directly into ambient air, and does not take into account a number of possible mitigating factors.

6.6.1 Average Daily Dose/Lifetime Daily Dose

This section discusses the methods used to quantify the average daily dose (ADD) of COPCs that may be received by the potential receptors from the ingestion, dermal contact, and inhalation of chemicals detected in soil and soil vapor at the Site. An ADD is calculated to estimate non-carcinogenic health hazard. A lifetime daily dose (LDD) is calculated to obtain the potential lifetime doses of carcinogenic chemicals that are received by the potential receptors.

The general equation used to estimate the average daily dose for ingestion and dermal contact exposures is:

$$\mathrm{ADD} = \frac{\mathrm{EPC_{soil}} \times \mathrm{CR} \times \mathrm{EF} \times \mathrm{ED} \times \mathrm{CF}}{\mathrm{BW} \times \mathrm{AT} \times 365}$$

Where:

ADD	=	Average daily intake (mg/kg/day)
EPC	=	Exposure point concentration (e.g., mg/kg soil or mg/m^3 vapor or airborne dust particles)
CR	=	Contact rate; the amount of medium contacted per unit of time or event (e.g., soil ingestion rate [mg/hour])
CF	=	Unit conversion factor (e.g., 1E-06 kg/mg)
EF	=	Exposure frequency (days/year)
ED	=	Exposure duration (years)
BW	=	Body weight (kg)
AT	=	Averaging time (years)

The Lifetime ADD (LADD) is estimated using the same equation. The only difference is that the averaging time (AT) is assumed to be an average human lifetime (70 years). For the inhalation exposure pathway, EPA (2009) recommends that when estimating risk or hazard via inhalation, the concentration of the chemical in air (e.g., μg/m^3) should be used as the exposure metric rather than inhalation intake of a COPC in air based on an inhalation rate and body weight (e.g., mg/kg-day). Therefore, the ADD for the inhalation pathway is replaced with an exposure concentration factor (EC), as follows:

$$EC_{inh} = \frac{EPC_{soil} \times EF \times ED \times ET}{AT \times PEF}$$

Where:

EC_{inh} = Exposure concentration factor of COPC in outdoor air from soil (kg/m^3)

EPC_{soil} = Exposure point concentration (e.g., mg/kg soil)

EF = Exposure frequency (days/year)

ED = Exposure duration (years)

ET = Exposure time (24 hours for a resident)

AT = Averaging time (years)

PEF = Particulate emission factor for soil (m^3/kg)

The default exposure parameters used in this HHRA for hypothetical residential receptors are based on approximate typical exposure conditions (DTSC, 2025a). These parameters are summarized in Table J-2.

6.6.2 Soil Exposure Non-Carcinogenic Health Hazard

The potential for adverse noncancer effects due to exposure to an individual COPC is expressed as the hazard quotient (HQ). COPC-specific HQs are estimated by calculating the ratio of the ADDs for ingestion or dermal exposures to the chronic RfD, and the exposure concentration (EC_{inh}) to the inhalation reference concentration (RfC). The following equations are used to estimate the noncancer HQ for direct contact and outdoor inhalation exposures, respectively:

$$HQ_{oral/dermal} = \frac{ADD}{RfD}$$

$$HQ_{inh} = \frac{EC_{inh}}{RfC}$$

The HQs for each COPC and all exposure pathways were summed to estimate the total hazard index (HI) for hypothetical on-Site residents, as follows:

$$HI = \sum_{n}^{1} HQ_i$$

Where:

HI = Hazard index, unitless

HQi = as defined above, unitless

Since children are known to be more sensitive to chemical exposures, HQs and HIs estimated for children are higher than those estimated for adult receptors. Therefore, it is customary in risk assessments to report only HQs and HIs estimated for child receptors for the residential scenario. This reporting convention is followed in this HHRA.

The estimated HIs are compared to an acceptable hazard level. Implicit in the HI is the assumption of a threshold level of exposure below which no adverse effects are expected to occur. For example, if the HI exceeds 1 (because Site-specific exposure exceeds the RfD), then the potential for non-cancer adverse effects may exist. In general, the greater the value above 1, the greater the potential hazard. In contrast, HIs equal to or less than 1 indicate that no adverse health effects are expected to occur from exposure to chemicals at the Site.

Using maximum detected soil chemical concentrations, the total HIs estimated in this HHRA from exposures to soil via incidental ingestion, dermal contact, and inhalation of outdoor air were:

- 0.3 for School Staff (Table J-7).
- 0.4 for School Students (Table J-7).
- 70 for hypothetical residential receptors (Table J-8).

For the School Exposure Scenario, the maximum concentrations of COPCs detected in the top 1-foot soil from landscaped areas were utilized for evaluation because any sample results below 1-foot are not part of the exposure pathway. Soil sample concentrations from boring locations under hardscape areas (i.e., asphalt, concrete, building foundation) were not used for the School Exposure Scenario because the hardscape material eliminates the potential incidental ingestion, dermal contact, and inhalation of outdoor air exposure pathways. The HIs estimated for the current School Exposure Scenario are below 1 and therefore considered acceptable under California environmental health and safety regulations.

By comparison, the HI estimated for the Hypothetical Residential Exposure Scenario exceeded the value of 1. For the Hypothetical Residential Exposure Scenario, the HHRA conservatively utilized the maximum COPC concentrations for all sampling locations and

depths even though (1) residential use is not anticipated, and (2) exposure to COPCs at all depths is not anticipated. The COPCs primarily responsible for the exceedance (i.e., the risk drivers) were antimony, cadmium, cobalt, copper, thallium, total dioxins (TEQ), and TPHd (Table J-8). Supporting calculations are presented in Attachments A and B of Appendix J.

6.6.3 Soil Exposure Cancer Risk Estimates

Cancer risk is expressed as the upper-bound, increased likelihood of an individual developing cancer as a result of exposure to a particular chemical. For example, a cancer risk of 1E-04 refers to an upper-bound increased chance of 1 in 10,000 of developing cancer over a lifetime (0.01% risk). The potential increase in cancer risk from exposure to the COPCs detected in soil at the Site is in addition to a background risk of Americans developing cancer. The background risk is 1 chance in 3 (0.3 or 3E-01) for every American female, and 1 chance in 2 (0.5 or 5E-01) for every American male, of eventually developing cancer (ACS, 2020).

The excess cancer risks were compared to the risk level considered acceptable by federal and state regulatory agencies. The target cancer risk level (benchmark) identified by the DTSC as acceptable in the PEA Guidance Manual is 1 in 1,000,000 (1E-06). However, the EPA has established acceptable incremental cancer risk levels to be within the risk management range of 1 in 10,000 (1E-04) and 1E-06; risks greater than 1E-04 are generally considered unacceptable.

Each COPC-specific cancer risk (CR) is estimated by multiplying the LADD for ingestion or dermal exposures by the COPC-specific CSF, or by multiplying the EC_{inh} by the IUR factor for inhalation exposures, to arrive at a unitless probability (e.g., 1E-06) of an individual developing cancer.

$$\mathrm{CR_{oral/dermal}} = \mathrm{LADD} \times \mathrm{CSF}$$

$$\mathrm{CR_{inh}} = \mathrm{EC_{inh}} \times \mathrm{IUR}$$

The CRs for each COPC and all exposure pathways were summed to estimate the total CR for hypothetical on-Site residents, as follows:

$$\mathrm{CR_{total}} = \sum_{i=1}^{n} (\mathrm{CR_i})$$

Where:

CR_{total} = Total cancer risk from all COPCs, unitless

CRi = cancer risk from individual COPC i detected in soil, unitless

Based on data collected, the incremental cancer risks estimated for exposures to COPC-impacted soil and dust through the ingestion, dermal, and inhalation pathway are:

- 4E-06 for School Staff (Table J-7).
- 7E-07 for School Students (Table J-7).
- 4E-05 for hypothetical residential receptors (Table J-8).

The incremental cancer risk estimated for the School Exposure Scenario for students is less than 1E-06 and therefore, considered acceptable under California environmental health and safety regulations and risk evaluation practices.

The cancer risk estimated for the School Exposure Scenario for staff and Hypothetical Residential Exposure Scenarios exceeded the DTSC's benchmark of 1E-06 (1 in 1,000,000). Incremental risk for school staff is slightly above the 1E-06 benchmark, calculated as an incremental risk of 4 in 1,000,000, within the risk management range. The risk driver responsible for the exceedance for school staff was total dioxins (Table J-7). This estimated cancer risk is based on two inputs, which tends to overestimate the risk: (1) the maximum dioxin TEQ, and (2) the toxicity of 2,3,7,8-TCDD, the most toxic dioxin. When the calculation is performed under a more realistic exposure scenario using the 95UCL dioxin TEQ for surface and shallow soils (8.93 pg/g), the estimated cancer risk for school staff is 1E-06, which is equal to the DTSC's benchmark of 1E-06 and therefore considered acceptable. Further, we note that all dioxin TEQs within surface and shallow soil are below the DTSC soil remedial goal of 50 pg/g (DTSC, 2017), and no 2,3,7,8-TCDD concentrations within the top foot of soil exceed the DTSC SL. As a result, it is reasonable to conclude that the incremental cancer risk for school staff is at or below the 1E-06 benchmark.

For the Hypothetical Residential Scenario, the HHRA conservatively utilized the maximum COPC concentrations for all sampling locations and depths even though (1) residential use is not anticipated, and (2) exposure to COPCs at all depths is not anticipated. Supporting calculations for each exposure scenario are presented in Attachments A and B of Appendix J.

6.6.4 Vapor Intrusion Non-Carcinogenic Health Hazard

For the inhalation exposure pathway, the HQ is defined as the ratio of the exposure concentration (EC) to the RfC. The HQ can be expressed according to the following equation:

$$HQ = \frac{EC}{RfC}$$

Where:

HQ = Hazard quotient, unitless

EC = Exposure concentration, $\mu g/m^3$

RfC = Reference concentration, $\mu g/m^3$

The estimated HQs are compared to an acceptable hazard level. Implicit in the HQ is the assumption of a threshold level of exposure below which no adverse effects are expected to occur. For example, if the HQ exceeds 1 (because Site-specific exposure exceeds the RfC), then the potential for non-cancer adverse effects may exist. In general, the greater the value above 1, the greater the potential hazard. In contrast, HQs equal to or less than 1 indicate that no adverse health effects are expected to occur from exposure to chemicals at the Site.

According to the EPA (1989), if the HQ is equal to or less than 1, there is no concern for potential chronic adverse health effects from the chemical exposures. The HQs estimated for the exposure scenarios evaluated were:

- 0.01 for School Staff (Table J-9).
- 0.006 for School Students (Table J-10).
- 3 for Hypothetical Residential Receptors (Table J-11).

Only the HQ estimated for the hypothetical residential receptors exceeded the benchmark value of 1, and the risk driver was TPHg (Table J-11).

6.6.5 Vapor Intrusion Cancer Risk Characterization

Inhalation cancer risk was calculated in accordance with DTSC (2015b) and EPA (1989) guidelines.

$$Risk = EC \bullet IUR$$

Where:

Risk = Upper bound incremental lifetime carcinogenic risk, unitless

EC = Exposure concentration, $\mu g/m^3$

IUR = Inhalation unit risk, $(\mu g/m^3)^{-1}$

Using the maximum detected VOC concentrations, the cancer risks estimated for the exposure scenarios were:

- 4E-07 for School Staff (Table J-12).
- 3E-08 for School Students (Table J-13).
- 2E-05 for the Hypothetical Residential Exposure Scenario (Table J-14).

The cancer risk estimated for the School Exposure Scenario are below the benchmark value of 1E-06 for both students and staff. The cancer risk estimated for the risk to hypothetical residential receptors exceeded the 1E-06 benchmark, and is within the EPA's risk management range. The risk drivers for the Hypothetical Residential Exposure Scenario were 1,2-DCA, benzene, ethylbenzene, and naphthalene(Table J-14).

6.7 HHRA Conclusions

Current regulatory guidance (DTSC, 2022) requires risk assessments to be conservative and health-protective in nature, meaning they are designed to overestimate, rather than underestimate, potential health risks based on current and proposed site uses. As a result, the actual risks at the Site are likely lower than those described in the HHRA.

Soil and Dust Exposure

- Arsenic was detected in soil at concentrations greater than the Site-specific background concentration of 15 mg/kg, and lead was detected in soil at concentrations greater than the DTSC's screening level of 80 mg/kg, which could pose a potential risk without mitigation.
- 95UCL calculations show that arsenic and lead concentrations in the top foot of soil are below applicable SLs. The Site's existing cover prevents Site users from direct exposure to elevated arsenic and lead concentrations in soil.
- Exposure to other COPCs detected in shallow soil (0 to 1-foot bgs) do not pose a health hazard for current staff and students for direct exposure (Table J-7).
- The incremental cancer risk estimated for the school students is below the 1E-06 benchmark (Table J-7).

- The incremental cancer risk estimated for the school staff slightly exceeds the 1E-06 benchmark when based on the maximum dioxin TEQ and using the toxicity from the most toxic of the dioxins. However, under a more realistic exposure scenario that uses the 95UCL dioxin TEQ for shallow soils (8.93 pg/g), the estimated cancer risk for school staff is 1E-06, which is equal to the DTSC's benchmark of 1E-06 and therefore considered acceptable.

- Exposure to maximum concentrations of COPCs detected in soil within the landfill waste could, if not mitigated, pose a cancer risk and/or health hazard to the hypothetical residential receptor (Table J-8).

Vapor Intrusion to Indoor Air Exposure

- VOCs detected in sub-slab vapor do not pose a health hazard for current students or school staff for indoor air exposures (Tables J-9 and J-10).

- The incremental cancer risks estimated for the both school students and staff are below the 1E-06 benchmark for indoor air exposures (Tables J-12 and J-13).

- For the hypothetical residential receptor, indoor air exposures to VOCs detected in soil vapor could, if not mitigated, pose a health hazard and a cancer risk (Tables J-11 and J-14).

Groundwater Exposure

- The groundwater exposure pathway is incomplete and does not present a risk.

Table 6-1: Summary of Cancer Risks and Non-Cancer Hazards

Receptor	Environmental Media	Cancer Risk	Non-Cancer Hazard	Cumulative Cancer Risk	Cumulative Non-Cancer Hazard
Hypothetical Residential	Soil	4.E-05	70	6.E-05	70
	Soil Vapor	2.E-05	3		
School Staff	Soil	4.E-06	0.3	4.E-06	0.3
	Soil Vapor	4.E-07	0.01		
School Student	Soil	7.E-07	0.4	7.E-07	0.4
	Soil Vapor	3.E-08 **Notes:** Cancer Risk Benchmark = 1E-06 Non-Cancer Hazard Benchmark = 1	0.006		

Notes:
Cancer Risk Benchmark = 1E-06
Non-Cancer Hazard Benchmark = 1

The risk and hazard calculations assumed multiple exposures to chemicals via incidental soil ingestion, dermal contact, outdoor inhalation, and inhalation of indoor vapors in accordance with

EPA and DTSC guidance. The results are based on multiple health-protective assumptions. For example, it was assumed that a VOC reservoir is located under the Site and that this VOC reservoir is unlimited in concentrations that are continuously released as vapors for up to 26 years.

All conclusions and recommendations presented in this HHRA are based on reported COPC concentrations and the current use of the Site as a middle school and the hypothetical future land use of the Site as residences. In this risk assessment, all fate-and-transport models, parameters, toxicity data and assumptions were applied in accordance with federal and state regulatory guidelines. These guidelines are meant to protect the public and tend to overestimate potential health risk. The residential scenario provides the most conservative assessment in regards to the potential receptors (adults and children within first 6 years of life) and exposure timeframe. The default AF of 0.03 was used to assess risk related to vapor intrusion and is considered protective of public health. As such, this risk assessment provides an estimate of the upper boundary of potential health risk, rather than an accurate representation of true health risk posed by the Site.

Further, we note that the purpose of the HHRA is to identify potential risk and hazard that will need to be addressed in the plans for the proposed school modernization project. The potential risks identified herein will be adequately addressed and mitigated as discussed in the Conclusions and Recommendations section below.

7 ECOLOGICAL RISK ASSESSMENT

A qualitative Screening-Level Ecological Risk Assessment (ERA) was conducted for the Site. The objectives of the ERA were to:

1. Evaluate potential threat posed by COPCs detected in soil at the Site to ecological receptors that may visit the Site now or in the foreseeable future. A summary of COPCs detected in soil samples are presented in Tables 3 through 9.

2. Evaluate the potential threat posed by COPCs detected in surface water and groundwater at the Site to ecological receptors that may utilize native habitats in the vicinity of the Site.

3. Evaluate soil sample data to ensure it meets current DTSC and EPA data quality objectives for a risk assessment. The collected data should be of sufficient quality and quantity for a valid statistical analysis including calculation of 95UCL.

The approach used for this ERA was based on EPA (EPA, 1989) and DTSC (DTSC, 2015b) guidance for the evaluation of potential ecological health risks. Specifically, the ERA was conducted by comparing the detected COPC concentrations in soil, surface water, and groundwater to screening levels published by health and environmental protection regulatory agencies. For COPCs detected in soil, the screening levels selected for comparison were the EPA

Ecological Soil Screening Levels (Eco-SSLs). If no Eco-SSLs were available, the screening levels published in the Los Alamos National Laboratory's ECORISK Database (ECORISK SLs). For COPCs detected in groundwater and surface water, except for TPHs, the screening levels selected for comparison were the ECORISK SLs for aquatic habitat. For TPHs in groundwater and surface water, concentrations were compared to SFBRWQCB Ecological ESLs for terrestrial habitat for soil and aquatic habitat. The ERA summary tables are included in Appendix K.

7.1 Site Characterization

The land use to the north, west, and south of the Site is mostly residential and commercial/industrial. A tidal marsh is located adjacent to the northwest of the Site and the Richardson Bay shoreline is located adjacent to the east of the Site. Ryan Creek cuts across the northern portion of the Site, oriented west to east, connecting the tidal marsh to the northeast and Pickleweed Inlet to the east of the Site. Three municipal parks (Bayfront Park, Hauke Park, and Bayfront Meadow) are located within approximately 1,000 feet to the southeast of the Site, and are used primarily for recreational purposes. The Bothin Marsh Preserve is located approximately 2,100 feet to the south of the Site and is fostered by the Marin County Open Space District.

7.2 Biological Characterization

7.2.1 Wildlife Habitat

According to the California Department of Fish and Wildlife (CDFW) Biogeographic Information and Observation System (BIOS), the tidal marshes to the northwest and east of the Site along the shoreline of Richardson Bay, are classified as brackish emergent tidal marsh and are considered native wildlife habitat (CDFW, 2025). The Site and the nearby municipal parks do not provide native habitat for wildlife, although some native biota may utilize the park habitats.

The greater San Francisco Bay shoreline, which encompasses Richardson Bay, contains many different ecosystems including intertidal coastal salt marshes, like found adjacent to the Site. These tidal marshes provide native habitat to a wide diversity of vertebrates including birds, reptiles, amphibians, and fish. Some threatened or endangered species that reside in these tidal marsh habitats include the California Clapper Rail (*Rallus longirostris obsoletus*) and the Salt-marsh Harvest Mouse (*Reithrodontomys raviventris*) (FSW, 2025).

Coastal tidal marshes are typically dominated by low-growing grasses and herbaceous perennials that are adapted to wet, salty soils. Typical tidal marsh plants found along the shoreline include, Pickleweed (*Sarcocornia pacifica*), Saltbush (*Atriplex prostrata*), and Cordgrass (*Spartina foliosa*) (BCDC, 2007).

7.3 Ecological Pathway Assessment

The Site is developed with the Mill Valley Middle School and does not support native vegetation or provide native habitat for wildlife. The future use of the Site will remain a school and is not planned for open space use. Therefore, there does not appear to be a significant soil pathway of exposure to ecologically sensitive receptors. However, the one area of the Site that may potentially be utilized by ecological receptors is limited to Ryan Creek. The tidally influenced creek receives water from the upgradient watershed drainage through a culvert located at the western end of the creek and from the Pickleweed Inlet during high tide. Except during high tide, the banks of the creek are exposed.

Groundwater at the Site is presumed to be tidally influenced and the Richardson Bay shoreline is located approximately 100 feet east of the Site. Thus, there is a potential groundwater exposure pathway for aquatic plants and animals living within the shoreline area to come in contact with COPC-impacted groundwater migrating from the Site.

7.4 Screening-Level Ecological Risk Assessment

The ecological screening levels used for this ERA were developed to screen sites to evaluate if further evaluation is needed, to prioritize areas of concern at large sites, and to calculate risks associated with multiple contaminants. Eco-SSLs used for soil consider exposure pathways for plants, invertebrates, and wildlife (birds and mammals). The direct exposure pathway is considered for plants and invertebrates and the ingestion pathway is considered for invertebrates and wildlife. ECORISK SLs are calculated using toxicity reference values to derive screening levels for terrestrial and aquatic plants, earthworms, birds, and mammals. The most conservative ecological screening level was used to compare detected COPC concentrations.

A summary of COPCs detected in soil at the Site is presented in Table K-1, which also presents the number of soil samples collected at the Site, the percent detected, and the minimum and maximum detected concentrations. Table K-1 also presents the ecological ESLs for soil used in the evaluation. Specifically for this ERA, the 95UCL concentrations detected in soil were compared to terrestrial ESLs.

The COPCs detected in soil whose 95UCL concentration exceeded their corresponding Eco-SSL included antimony, arsenic, cadmium, chromium, cobalt, copper, lead, nickel, mercury, vanadium, and zinc. Based on these results, it can be concluded some metals detected in soil could pose a potential health risk to ecological receptors at the Site. However, because the school grounds are not used as open space and are primarily covered with paved areas, buildings, and man-made landscape areas with no native habitat areas, the soil exposure pathway to ecological receptors across a majority of the Site is considered incomplete.

As for Ryan Creek, sediment samples SS-1 through SS-4 were collected from the bank of the Creek with locations targeting soils visibly mixed with debris. For samples collected from the bank of Ryan Creek, the maximum detected concentrations were compared to their corresponding Eco-SSLs. A summary of COPCs detected in sediment from Ryan Creek and a comparison to their corresponding Eco-SSLs is presented in Table K-2. Chromium, copper, lead, nickel, mercury, vanadium, and zinc detected in creek sediment exceeded their corresponding screening levels (Table K-2).

A summary of metals detected in surface water and groundwater at the Site is presented in Table K-3. A summary of TPH fractions detected in groundwater are presented in Table K-4. Tables K-3 and K-4 also present the maximum detected concentrations compared to aquatic habitat ECORISK SLs for metals and SFBRWQCB Ecological ESLs for TPHs.

The COPCs whose maximum detected concentrations exceeded their corresponding aquatic ecological screening levels included arsenic, barium, beryllium, cadmium, chromium, cobalt, copper, lead, nickel, mercury, silver, vanadium, zinc, and TPHd. Based on these results, it can be concluded some metals and TPHd detected in surface water and groundwater at the Site could pose a potential health risk to ecological receptors at the nearby Richardson Bay shoreline.

7.5 Statistical Analysis

A statistical analysis was conducted for all COPCs detected in soil at a frequency of detection of more than 5%. Any COPC detected at a frequency of detection of less than 5% was deemed to be too infrequent at the Site to pose a potential health threat to ecological receptors. The soil data was analyzed following EPA and DTSC guidance. The statistical analysis was conducted using Microsoft Excel software, which is recommended by both the EPA and DTSC for screening-level evaluations. For samples reported as not-detected, one-half of the laboratory reporting limit for the sample was used as a surrogate for the chemical concentration in the sample. The results of the statistical analysis are presented in Table K-1.

The DTSC recommends that the one-sided 95UCL of the arithmetic mean be used as an upper bound chemical concentration that can be expected at a site. The 95UCL provides reasonable confidence that the true site average will not be underestimated. According to the EPA (EPA,2002), risk assessment exposure concentrations should use the 95UCL unless the 95UCL exceeds the maximum detected concentration for a particular chemical. Where the 95UCL exceeds the maximum detected concentration, the maximum detected concentration is used as the upper limit exposure concentration. The 95UCL can exceed the maximum detected concentration for several reasons, including small sample sizes and large sample variances. Following EPA guidance, the lower value of the maximum concentration or the 95UCL was used in the risk evaluation (EPA, 2002).

7.6 ERA Conclusions

Results of the ERA indicate that:

- The soil exposure pathway to ecological receptors across the Site (excluding Ryan Creek) is considered incomplete. Therefore, COPCs detected within the school grounds do not pose a potential threat to ecological receptors.
- Sediment samples collected from the bank of the Ryan Creek indicating that chromium, copper, lead, nickel, mercury, vanadium, and zinc detected in Ryan Creek sediment could pose a potential threat to ecological receptors (Table K-2).
- Maximum concentrations of COPCs in surface water and groundwater may pose a potential threat to ecological receptors at the native tidal marsh habitats adjacent to the Site.
- Soil and water sample data used for the ERA meets current DTSC and EPA data quality objectives and is appropriate for this screening-level risk assessment.

8 SEA LEVEL RISE ASSESSMENT

Ninyo & Moore evaluated the current Site conditions using a potential future sea level rise (SLR) scenario to determine if the Site would be impacted by sea level rise and/or groundwater rise contributed to rising sea levels in the near-term (2020-2050) and mid-term (2060-2100). As part of the proposed redevelopment project, at least parts of the Site's current grade are planned to be raised through placement of clean fill material. The scenarios presented in this SLRA do not account for any increase in Site elevation or any other potential SLR mitigations, including local and/or regional mitigations. The projected SLR scenarios are obtained from the California Ocean Protection Council's (OCP's) State of California Sea Level Rise Guidance: 2024 Science and Policy Update (OCP, 2024). The SLR scenario selected for this assessment was the Intermediate-High Scenario. This scenario is based on intermediate-to-high future emissions and high warming.

Multiple contributing factors were considered when developing SLR scenarios outlined in the OCP's Sea Level Rise Guidance and are based on various assumptions. Generally, the more extreme the scenario, the less plausible the scenario is. The Intermediate-High Scenario is the second most extreme scenario presented in the guidance document and consequently the second least plausible scenario. Determining which scenario to choose is in part based on risk aversion. Because the current and future uses of the Site are a middle school, the intermediate-to-high scenario provides a relatively high-risk aversion for a near-term timeframe (2030, 2040, and 2050) and a mid-term timeframe (2100; OPC, 2024). Under the intermediate-to-high scenario, the amount of SLR by 2100 corresponds to plausible high-end projections (i.e., less plausible than other scenarios; OCP, 2024). The nearest tide gauge to the Site is the San Francisco tide gauge; therefore, the projected amounts of SLR for this tide gauge were used to assess potential SLR at the Site and are summarized below in Table 8-1.

Table 8-1: Projected Sea Level Rise Scenarios for San Francisco (in feet)

Year	Low	Int-Low	Intermediate	Int-High	High
2020	0.2	0.2	0.2	**0.3**	0.3
2030	0.3	0.4	0.4	**0.4**	0.4
2040	0.4	0.5	0.6	**0.7**	0.8
2050	0.5	0.6	0.8	**1.0**	1.3
2060	0.6	0.8	1.1	**1.5**	2.0
2070	0.7	1.0	1.4	**2.2**	2.9
2080	0.8	1.2	1.8	**3.0**	4.1
2090	0.9	1.4	2.4	**3.8**	5.3
2100	1.0	1.6	3.1	**4.8**	6.5

Notes:
Int-Low = Intermediate-Low scenario
Int-High = Intermediate-High scenario
Bold values indicate intermediate-to-high scenario used for this SLRA.

The projected amounts of SLR for the intermediate-to-high scenario were modeled incorporating existing Site conditions using publicly available modeling systems including the San Francisco Bay Conservation and Development Commission's Adapting to Rising Tides (ART; BCDC, 2025) program and the Coastal Storm Modeling System (CoSMoS) developed by the United States Geological Survey (USGS, 2025b). The interpretation of SLR and the impacts it would have on the Site are based on current conditions and assume no mitigation measures are conducted.

8.1 Baseline Conditions

The current Site topography sits at an elevation of approximately 15 to 17 feet amsl on the west side and gently slopes to approximately 7 feet amsl on the east side. Based on a review of Federal Emergency Management Agency (FEMA) flood hazard maps, the Site is located within the 500-year flood zone (FEMA, 2016). During the PEA investigations, groundwater was encountered between 3 and 12 feet bgs. Depending on the location at the Site, COPC-impacted waste can be submerged from approximately 0.5 foot to 8.5 feet below the water table.

8.2 Near-Term SLR: 2030, 2040, 2050

2030 – 0.4 Foot of SLR

A SLR of 0.4 foot by the year 2030 would likely have minimal effects on the groundwater table elevation and raise the water table by approximately 0.4 foot. This may submerge impacted soil below the water table that previously was not saturated but assuming groundwater is currently tidally influenced, this amount of groundwater rise may already occur during King Tides and storm surge events. A SLR of 0.4 foot would likely increase the amount of water flowing through Ryan Creek during high tide and storm surge events and increase the chances off overtopping the banks of the creek.

2040 – 0.7 Foot of SLR

A projected 0.7 foot of SLR would likely have similar effects that a SLR of 0.4 foot will have except that the groundwater table and surface water elevation in the creek would be approximately 0.3 foot higher than in 2030. Overtopping of the creek banks may become more frequent during high tides and storm surge events.

2050 – 1.0 Foot of SLR

A projected SLR of 1.0 foot would start overtopping the creek banks on the east side of the Site and minor flooding may occur on the eastern Site boundary adjacent to Pickleweed Inlet (Figure 18). Additionally, this would raise the groundwater elevation by approximately 1 foot and COPCs that were previously only saturated during high tide and storm surge events, may now be permanently submerged and potentially increase the leaching of chemicals into groundwater and subsequently mobilizing contaminants.

8.3 Mid-Term SLR: 2060 to 2100

2060 – 1.5 Feet of SLR

A projected SLR of 1.5 feet would increase the length of bank creek that would be overtopped and would begin overtopping the eastern Site boundary. Flooding would extend further west onto the Site and may begin to impact some school buildings that are located at lower elevations. The flood gate at the east side of the creek would likely no longer be sufficient and would be overtopped. Groundwater would rise approximately 1.5 feet and would be as shallow as 1.5 feet bgs in some places on-Site, nearly saturating all COPC-impacted waste in that area. The northeastern corner of the parking lot on the east side of the school would be permanently inundated with water. Any shallow contaminants may become saturated and mobile.

2070 – 2.2 Feet of SLR

A SLR of 2.2 feet would overtop the entire length of Ryan Creek from the flood gate to the marsh located to the northwest of the main school building. The portables and the blacktop in the northern portion of the Site would no longer be accessible from the main campus. The eastern side of the parking lot would flood and become inundated with up to 2 feet of water.

2080 – 3.0 Feet of SLR

A SLR of 3.0 feet would overtop the entirety of the eastern and northern Site boundaries and the marsh would be under approximately 3.5 to 4 feet of water (Figure 19). A majority of the eastern parking lot would be under approximately 1 foot of water and the portable located on the north side of the gymnasium would begin to be impacted with up to 0.5 foot of water. The groundwater table would have risen approximately 3 feet and all areas where groundwater is currently encountered at 3 feet bgs, would be inundated. COPCs that previously had not been in contact with groundwater would now be saturated.

2090 – 3.8 Feet of SLR

A SLR of 3.8 feet would have similar effects as 3.0 feet. The eastern half of the Site would continue to be inundated with deeper flood waters and the deepest depth to groundwater at the Site would be approximately 6 feet bgs. The portion of the Site located to the north of Ryan Creek would be flooded with water depths ranging from 0.5 to 2 feet.

2100 – 4.8 Feet of SLR

In the year 2100, with a SLR of 4.8 feet, the entire perimeter of the Site would be flooded from overtopping along the eastern and northern Site boundaries and from groundwater emerging at the surface (Figure 20). The highest elevations at the center of the Site would essentially become

an island. Storm surge events would flood almost the entirety of the Site. Almost all COPCs at the site would be saturated and any underground infrastructure and utilities would be in contact with brackish water.

8.4 Impacts of SLR

Near-term SLR projections would expect to see increases in the groundwater elevation across the Site ranging from 0.4 to 1 foot, which may potentially come into contact with COPC-impacted waste that was previously above the water table, though we note that some of the waste is currently submerged. Extreme high tides, such as King Tides, and storm surge events would likely increase the likelihood and frequency of temporary flooding on the east side of the Site. By 2050, overtopping of the banks of Ryan Creek may be observed and flooding of low-lying areas adjacent to the creek would occur.

Mid-term projections expect the perimeter of the Site to be inundated with water, essentially creating an island of the higher elevations at the center of the Site by 2100. The low-lying areas such as the eastern and northern portions of the Site and Sycamore Avenue to the south of the Site would be inundated with up to approximately 3 feet of water. The inundation would occur by overtopping of the creek banks and the eastern Site boundary. The portable buildings to the north of Ryan Creek and to the north of the gymnasium would begin to flood. The groundwater elevation at the Site would have risen approximately 5 feet compared to current conditions and further submerge contaminants that were previously in the vadose zone.

Impacts of surface flooding due to SLR could result in damage to buildings in low-lying areas, such as the portables, erosion and damage to Site improvements like paved areas, saturation of shallow soils impacted with COPCs, loss of useable area space such as the eastern parking lots and blacktop area in the northeast corner of the Site and would render the natural drainage (Ryan Creek) of the Site ineffective. Impacts of groundwater rise associated with SLR could include submerging COPC-impacted waste that was previously above the water table and potentially increasing the concentration of contaminants that could leach to groundwater, and increasing the mobilization of contaminants. Groundwater rise would result in a reduction of the vadose zone, potentially pushing COPC-impacted soil vapor closer to the surface.

If left unmitigated and unaccounted for, SLR may result in negative impacts to the Site that may lead to increased environmental concerns and issues at the Site, primarily associated with groundwater and soil vapor. SLR impacts at the Site would be required to be mitigated through collaboration with multiple stakeholders since the historical footprint of the landfill expands beyond

the Site boundaries and is overlain by multiple properties with different owners. We note that SLR is a regional issue and would also likely affect neighboring properties.

9 CONCLUSIONS AND RECOMMENDATIONS

In November 2024, Ninyo & Moore advanced 44 borings to collect soil samples, installed and attempted to sample ten soil vapor probes (three dual-nested), collected six grab-groundwater samples from borings, and collected surface soil and water samples from Ryan Creek as proposed in the DTSC-approved PEA Work Plan. As requested by DTSC, Ninyo & Moore conducted the following sampling this summer:

- Resampled existing soil vapor probes - July 2025
- Installed and sampled eleven sub-slab vapor pins – August 2025
- Collected ten surface soil samples from select landscape areas – September 2025

Environmental investigations at the Site characterized the extent, composition, and surface impacts of historical landfill materials. The findings confirm that waste materials are widespread but well delineated, and that surface soils generally meet applicable SLs with only limited, localized exceedances.

- Landfill waste was encountered across most of the Site, except in the southwestern portion where native soil was present.
- Waste has been vertically delineated and is underlain by Bay Mud. The landfill waste constitutes most of the landmass above the Bay Mud.
- Waste thickness is greatest in the center of the Site and gradually thins toward the east and west.
- Landfill waste was generally observed from approximately 0 to 10 feet amsl.
- Landfill waste was observed in the banks of Ryan Creek; however, no COPCs were detected above screening levels in sediment, except for dioxins in sample SS-3.
- No landfill waste was observed in surface soil within landscaped areas.
- Lead and mercury were detected slightly above SLs in surface soil samples LSS-5 and LSS-8, respectively.
- Dioxins were detected slightly above SLs in surface soil samples LSS-4 and LSS-9.
- Average concentrations of lead and dioxin TEQs, based on the 95UCL for soil from 0 to 1 foot bgs in exposed areas, are below applicable SLs.

A CSM was prepared and an HHRA was completed. COPCs consist of metals (primarily lead and arsenic), TPHs, PAHs, and dioxins in soil; metals and TPHs in (unfiltered) groundwater; and VOCs in soil vapor and sub-slab vapor. COPC-impacted soil is primarily detected within the waste prism and is heterogeneously distributed both laterally and vertically at the Site. The landfill waste and COPC impacts are vertically delineated by Bay Mud. COPC-impacted groundwater primarily consists of metals with maximum concentrations located in the central portion of the Site. Surface water was slightly impacted above MCLs with lead and TPHd in samples collected from the eastern half of the creek and were not detected in the most western sample collected near the tidegate.

The HHRA assessed two different scenarios, (1) current school staff and students (based on current building footprints), and (2) hypothetical future residential receptors. Current regulatory guidance requires risk assessments to be health-protective in nature and will likely overestimate potential health risks at the Site based on current and future Site use. Therefore, actual risks associated with conditions evaluated in this HHRA are likely to be lower than those described herein. Results of the HHRA indicate that:

Soil and Dust Exposure

- There is no risk of direct exposure to elevated arsenic or lead concentrations in soil for current Site users because the existing soil and hardscape cover prevents contact. Arsenic was detected in soil at concentrations greater than the Site-specific background concentration of 15 mg/kg, and lead was detected in soil at concentrations greater than DTSC's screening level of 80 mg/kg, which could pose a potential risk without mitigation. The average arsenic and lead concentrations (using the 95UCL) in the top foot of soil are below applicable SLs.

- Other COPCs detected in soil do not pose a cancer risk or health hazard for students in current school Site conditions.

- The incremental cancer risk estimated for school staff is 4E-06, which is slightly above the 1E-06 benchmark, well within agency risk management range, based on the maximum detected dioxin toxicity equivalents (TEQ). When using the average dioxin concentration (based on a 95UCL), the incremental cancer risk for school staff is below the benchmark and deemed acceptable.

- Exposure to maximum concentrations of COPCs detected in soil within the landfill waste could, if not mitigated, pose a cancer risk and/or health hazard to the hypothetical residential receptor (Table J-8).

Vapor Intrusion to Indoor Air Exposure

- Sub-slab samples results support the conclusion that vapor intrusion is not a risk. VOCs detected in sub-slab vapor do not pose a health hazard for current students or school staff for indoor air exposures (Tables J-9 and J-10).

- The incremental cancer risk estimated for both students and staff is below the 1E-06 benchmark for indoor air exposures (Tables J-12 and J-13).

- For the hypothetical residential receptor, indoor air exposures to VOCs detected in soil vapor could, with no mitigation measures implemented pose a health hazard and a cancer risk (Tables J-11 and J-14).

Groundwater Exposure

- The groundwater exposure pathway is incomplete and does not present a risk.

In addition to the HHRA, an ERA was completed to qualitatively assess potential threats associated with detected COPC concentrations in soil and groundwater to ecological receptors on and adjacent to the Site. Results of the ERA indicate that:

- The soil exposure pathway to ecological receptors across the Site (excluding Ryan Creek) is considered incomplete. Therefore, COPCs detected within the school grounds do not pose a potential threat to ecological receptors.

- Surface soil samples collected from the bank of the Ryan Creek indicating that lead, vanadium, and total dioxins detected in Ryan Creek sediment could pose a potential threat to ecological receptors (Table K-2).

- Maximum concentrations of COPCs in surface water and groundwater may pose a potential threat to ecological receptors at the native tidal marsh habitats adjacent to the Site.

- Soil and water sample data used for the ERA meets current DTSC and EPA data quality objectives and is appropriate for this screening-level risk assessment.

This PEA has evaluated the continued use of the Mill Valley Middle School buildings, that may be modernized within their existing footprints. Based on the data evaluated, and because contamination at landfill sites is typically delineated by identifying the extent of the landfill waste prism due to the heterogeneous nature of landfills, Ninyo & Moore believes the Site is adequately characterized to move forward with the modernization project.

Although the HHRA and this PEA Report do not identify increased risks under the current school scenario, Ninyo & Moore recommends developing a Mitigation Plan as a measure of conservatism to ensure that the Site remains protective of users. The Mitigation Plan will provide mitigation measures, including installation of sub-slab depressurization systems beneath existing buildings, to address COPCs detected in soil and sub-slab vapor. Additional measures that will be incorporated into the Mitigation Plan will consist of a land use covenant to restrict the use of groundwater at the Site (ensuring that the groundwater pathway remains incomplete), improving the cover overlaying the waste as necessary, and long-term maintenance and operation of the

Site's mitigation measures under the oversight of the LEA. The Mitigation Plan will be prepared prior to the recommended investigation work below to accommodate the proposed schedule.

Based on the PEA results, Ninyo & Moore also recommends the following additional activities be conducted as a separate Supplemental Site Investigation process to address potential issues not directly impacting any Site modernization project:

- Perform additional sub-slab vapor sampling to evaluate seasonal and temporal variability in sub-slab vapor concentrations.
- Collecting surface and/or groundwater samples (using silica gel cleanup) to further evaluate COPC-impacted groundwater and surface water, and potential exposure to ecological receptors.

10 LIMITATIONS

The environmental services described in this report have been conducted in general accordance with current regulatory guidelines and the standard-of-care exercised by environmental consultants performing similar work in the project area. No warranty, expressed or implied, is made regarding the professional opinions presented in this report. Variations in Site conditions may exist and conditions not observed or described in this report may be encountered during subsequent activities. Please also note that this assessment did not include an evaluation of geotechnical conditions or potential geologic hazards.

Ninyo & Moore's opinions and recommendations regarding environmental conditions, as presented in this report, are based on limited subsurface assessment and chemical analysis. Further assessment of potential adverse environmental impacts from past on-Site and/or nearby use of hazardous materials may be accomplished by a more comprehensive assessment. The samples collected and used for testing, and the observations made, are believed to be representative of the area(s) evaluated; however, conditions can vary significantly between sampling locations. Variations in soil and/or groundwater conditions will exist beyond the points explored in this evaluation.

The environmental interpretations and opinions contained in this report are based on the results of laboratory tests and analyses intended to detect the presence and concentration of specific chemical or physical constituents in samples collected from the subject Site. The testing and analyses have been conducted by an independent laboratory which is certified by the State of California to conduct such tests. Ninyo & Moore has no involvement in, or control over, such

testing and analysis. Ninyo & Moore, therefore, disclaims responsibility for any inaccuracy in such laboratory results.

Ninyo & Moore's conclusions, recommendations and opinions are based on an analysis of the observed Site conditions. It should be understood that the conditions of a site could change with time as a result of natural processes or the activities of man at the subject Site or nearby sites. In addition, changes to the applicable laws, regulations, codes and standards of practice may occur due to government action or the broadening of knowledge. The findings of this report may, therefore, be invalidated over time, in part or in whole, by changes over which Ninyo & Moore has no control.

This document is intended to be used only in its entirety. No portion of the document, by itself, is designed to completely represent any aspect of the project described herein. Ninyo & Moore should be contacted if the reader requires any additional information, or has questions regarding content, interpretations presented, or completeness of this document.

This report is intended exclusively for use by the client. Any use or reuse of the findings, conclusions and/or recommendations of this report by parties other than those noted is undertaken at said parties' sole risk.

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APPENDIX J

Human Health Risk Assessment Summary Tables

Table J-1: Exposure Parameters for On-Site Receptors - School Exposure Scenario

Exposure/Site Specific Parameters	Units	School Exposure Parameters		
		Staff	Student	Source
Soil Ingestion Rate (IR-S)	mg/day	100	100	DTSC 2004
Skin Surface Area (SA)	cm^2/day	6,032	2,373	DTSC 2025
Skin Adsorption Factor (ABS)	unitless	chem-specific	chem-specific	DTSC 1994/EPA 1997
Adherence Factor (AF)	mg/cm^2	0.20	0.80	DTSC 2004
Fraction of Soil Exposed (FE)	unitless	1	1	Default
Exposure Frequency (EF)	days/year	250	180	DTSC 2004
Exposure Frequency (dermal; EFd)	days/year	250	180	DTSC 2004
Exposure Duration (ED)	years	25	3	Site-specific
Exposure Time (ET)	hours	8	6	Site-specific
Conversion Factor (CF)	kg/mg	1.0E-06	1.0E-06	--
Body Weight (BW)	kg	80	47.9	DTSC 2025
Averaging Time for Noncarcinogens (AT_n)	days	9,125	1,095	EPA 1989 (ED*365 days/yr)
Averaging Hours for Noncarcinogens (AT_n)	hours	219,000	26,280	EPA 1989 (ED*365 days/yr)
Averaging Time for Carcinogens (AT_c)	days	25,550	25,550	EPA 1989
Averaging Hours for Carcinogens (AT_c)	hours	613,200	613,200	EPA 1989

Table J-2: Exposure Parameters for On-Site Receptors - Hypothetical Residential Exposure Scenario

Exposure Parameters	Units	Residential Scenario		Source
		Adult	Child	
Soil Ingestion Rate (IR-S)	mg/day	100	200	DTSC 2025
Skin Surface Area (SA)	cm^2/day	6,032	2,373	DTSC 2025
Skin Adsorption Factor (ABS)	unitless	chem-specific	chem-specific	DTSC 1994/USEPA 1997a
Adherence Factor (AF)	mg/cm^2	0.07	0.20	DTSC 2025
Fraction of Soil Exposed (FE)	unitless	1.0	1.0	Default
Exposure Frequency (EF)	days/year	350	350	DTSC 2025
Exposure Frequency (dermal; EFd)	days/year	350	350	DTSC 2025
Exposure Duration (ED)	years	20	6	DTSC 2025
Exposure Time (ET)	hours/day	24	24	DTSC 2025
Conversion Factor (CF)	kg/mg	1.0E-06	1.0E-06	--
Body Weight (BW)	kg	80	15	DTSC 2025
Averaging Time for Noncarcinogens (AT_n)	days	7,300	2,190	USEPA 1989 (ED*365 dys/yr)
Averaging Hours for Noncarcinogens (AT_n)	hours	175,200	52,560	USEPA 2009
Averaging Time for Carcinogens (AT_c)	days	25,550	25,550	USEPA 1989
Averaging Hours for Carcinogens (AT_c)	hours	613,200	613,200	

Table J-3: Indoor Air Exposure Point Concentrations Estimated for Hypothetical Residential Exposure Scenario			
Chemical of Potential Concern (COPC)	**CAS Number**	**Maximum Detected Soil Vapor Concentration (ug/m^3)**	**Estimated Indoor Chemical Air Concentration (ug/m^3)**
1,1,1-Trichloroethane	71556	110	3.30E+00
1,2-Dichlorobenzene	95501	2.8	8.40E-02
1,2-Dichloroethane	107062	8.5	2.55E-01
1,2,4-Trimethylbenzene	95636	36	1.08E+00
1,3,5-Trimethylbenzene	108678	28	8.40E-01
1,4-Dichlorobenzene	106467	7	2.10E-01
1,4-Dioxane	123911	5.3	1.59E-01
2-Butanone	78933	33	9.90E-01
2,2,4-Trimethylpentane	95636	17	5.10E-01
4-Ethyltoluene	95476	3.1	9.30E-02
4-Methyl-2-pentanone	108101	20	6.00E-01
Acetone	67641	550	1.65E+01
Benzene	71432	17	5.10E-01
Carbon Disulfide	75150	18	5.40E-01
Chlorobenzene	108907	15	4.50E-01
Chloroform	67663	1.5	4.50E-02
Isopropylbenzene	98828	53	1.59E+00
Ethylbenzene	100414	270	8.10E+00
Freons	75694	47	1.41E+00
Hexanes	110543	1870	5.61E+01
Naphthalene	91203	7.2	2.16E-01
Propylbenzene	103651	12	3.60E-01
Styrene	100425	16	4.80E-01
Tetrachloroethene	127184	10	3.00E-01
Tetrahydrofuran	109999	6.7	2.01E-01
Toluene	108883	38	1.14E+00
Trichloroethene	79016	4.7	1.41E-01
Vinyl Chloride	75014	0.37	1.11E-02
Xylenes, total	95476	206	6.18E+00
TPH-g	E1790676	53000	1.59E+03

Notes:

Attenuation factor for chlorinated VOCs (unitless) = 0.03

Attenuation factor for petroleum-derived VOCs (unitless) = 0.03

ug/m^3 = micrograms per cubic meter

NA = Not applicable or not available

NE = Not evaluated

Table J-4: Indoor Air Exposure Point Concentrations Estimated for School Exposure Scenario

Chemical of Potential Concern (COPC)	CAS Number	Maximum Detected Sub-Slab Vapor Concentration ($\mu g/m^3$)	Default Indoor Chemical Air Concentration (ug/m^3)	Estimated Site-Specific Indoor Chemical Air Concentration ($\mu g/m^3$)
1,2-Dichlorobenzene	95501	2.8	8.40E-02	2.5E-02
1,2-Dichloroethane	107062	8.5	2.55E-01	7.6E-02
1,2,4-Trimethylbenzene	95636	3.4	1.02E-01	3.0E-02
1,4-Dioxane	123911	5.3	1.59E-01	4.7E-02
2-Butanone	78933	33	9.90E-01	2.9E-01
2,2,4-Trimethylpentane	95636a	3.4	1.02E-01	3.0E-02
4-Ethyltoluene	95476	3.1	9.30E-02	2.8E-02
4-Methyl-2-pentanone	108101	20	6.00E-01	1.8E-01
Acetone	67641	550	1.65E+01	4.9E+00
Benzene	71432	6	1.80E-01	5.3E-02
Carbon Disulfide	75150	5.7	1.71E-01	5.1E-02
Chloroform	67663	1.4	4.20E-02	1.2E-02
Dichlorodifluoromethane	75718	2.6	7.80E-02	2.3E-02
Ethylbenzene	100414	15	4.50E-01	1.3E-01
Hexanes	110543	14.8	4.44E-01	1.3E-01
Styrene	100425	16	4.80E-01	1.4E-01
Tetrachloroethene	127184	10	3.00E-01	8.9E-02
Tetrahydrofuran	109999	6.7	2.01E-01	6.0E-02
Toluene	108883	22	6.60E-01	2.0E-01
Vinyl Chloride	75014	0.37	1.11E-02	3.3E-03
Xylenes, total	95476	72	2.16E+00	6.4E-01

Notes:

Attenuation factor (unitless) = 0.03

Ceiling height (feet) = 13.5

Building ventilation rate (AE/hr) = 1

$\mu g/m^3$ = micrograms per cubic meter

NA = Not applicable or not available

Table J-5: Toxicity Criteria for Chemicals of Potential Concern in Soil

Chemical	Chronic Oral Reference Dose (RfDo) [mg/kg-day]	Inhalation Reference Concentration (RfCi) [ug/m^3]	Oral Cancer Slope Factor (CSFo) [mg/kg-day]$^{-1}$	Inhalation Unit Risk (IUR) [ug/m^3]$^{-1}$
Metals				
Antimony	4.0E-04	3.0E-01	NA	NA
Barium	2.0E-01	5.0E-01	NA	NA
Beryllium	2.0E-04	7.0E-03	NA	2.4E-03
Cadmium	1.0E-04	1.0E-02	NA	4.2E-03
Chromium (VI)	9.0E-04	3.0E-02	5.0E-01	1.5E-01
Cobalt	3.0E-04	6.0E-03	NA	9.0E-03
Copper	4.0E-02	NA	NA	NA
Nickel	1.1E-02	1.4E-02	NA	2.6E-04
Mercury	1.6E-04	3.0E-02	NA	NA
Molybdenum	5.0E-03	2.0E+00	NA	NA
Selenium	5.0E-03	2.0E+01	NA	NA
Silver	5.0E-03	NA	NA	NA
Thallium	1.0E-05	NA	NA	NA
Vanadium	5.0E-03	1.0E-01	NA	NA
Zinc	3.0E-01	NA	NA	NA
Pesticides				
4,4'-DDT	5.0E-04	NA	3.4E-01	9.7E-05
4,4'-DDD	5.0E-04	NA	2.4E-01	6.9E-05
Chlordane	5.0E-04	7.0E-01	3.5E-01	1.0E-04
PCBs				
Aroclor-1248	NA	NA	2.0E+00	5.7E-04
Aroclor-1260	NA	NA	2.0E+00	5.7E-04
Aroclor-1268	NA	NA	2.0E+00	5.7E-04
SVOCs				
1-Methylnaphthalene	7.0E-02	3.0E-03	5.1E-02	1.3E-05
2-Methylnaphthalene	4.0E-03	1.6E+01	NA	NA
Naphthalene	2.0E-02	3.0E+00	1.2E-01	3.4E-05
Acenaphthylene	6.0E-02	2.4E+02	NA	NA
Acenaphthene	6.0E-02	2.4E+02	NA	NA
Fluorene	4.0E-02	1.6E+02	NA	NA
Phenanthrene	4.0E-02	1.6E+02	NA	NA
Anthracene	3.0E-01	1.2E+03	NA	NA
Fluoranthene	4.0E-02	NA	NA	NA
Pyrene	3.0E-02	1.2E+02	NA	NA
Benzo(a)anthracene	NA	NA	1.0E-01	1.1E-04
Chrysene	NA	NA	1.0E-03	1.1E-05
Benzo(b)fluoroanthene	NA	NA	1.0E-01	1.1E-04
Benzo(k)fluoroanthene	NA	NA	1.0E-02	1.1E-04
Benzo(a)pyrene	3.0E-04	2.0E-03	1.0E+00	1.1E-03
Indeno(1,2,3-cd)pyrene	NA	NA	1.0E-01	1.1E-04
Dibenz(a,h)anthracene	NA	NA	4.1E+00	1.2E-03
Dioxins				
Total Dioxins*	7.0E-10	4.0E-05	1.3E+05	3.8E+01
TPH				
TPH-g	3.9E-02	6.2E+02	NA	NA
TPH-d	1.9E-02	1.9E+02	NA	NA
TPH-mo	1.5E-01	NA	NA	NA

Notes:

Values taken from HHRA Note No. 10, 2025

mg/kg = milligrams per kilogram

ug/m^3 = micrograms per cubic meter

* = Toxicity data for 2,3,7,8-TCDD

Table J-6: Toxicity Criteria for Chemicals of Potential Concern in Soil Vapor and Sub-Slab Vapor

Chemical	Chronic Inhalation Reference Concentration (RfC) (ug/m^3)	Inhalation Unit Risk $(ug/m^3)^{-1}$
1,1,1-Trichloroethane	1.0E+03	NA
1,2-Dichlorobenzene	2.0E+02	NA
1,2-Dichloroethane	7.0E+00	2.6E-05
1,2,4-Trimethylbenzene	6.0E+01	NA
1,3,5-Trimethylbenzene	6.0E+01	NA
1,4-Dichlorobenzene	8.0E+02	1.1E-05
1,4-Dioxane	3.0E+01	5.0E-06
2-Butanone	5.0E+03	NA
2,2,4-Trimethylpentane	6.0E+01	NA
4-Ethyltoluene	1.0E+02	NA
4-Methyl-2-pentanone	3.0E+03	NA
Acetone	3.1E+04	NA
Benzene	3.0E+00	2.9E-05
Carbon Disulfide	7.0E+02	NA
Chlorobenzene	5.0E+01	NA
Chloroform	2.0E+00	2.3E-05
Isopropylbenzene	4.0E+02	NA
Ethylbenzene	1.0E+03	2.5E-06
Freons	5.0E+03	NA
Hexanes	7.0E+02	NA
Naphthalene	3.0E+00	3.4E-05
Propylbenzene	1.0E+03	NA
Styrene	9.0E+02	NA
Tetrachloroethene	4.0E+01	6.1E-06
Tetrahydrofuran	2.0E+03	NA
Toluene	4.2E+02	NA
Trichloroethene	2.0E+00	4.1E-06
Vinyl Chloride	5.1E+01	7.8E-05
Xylenes, total	1.0E+02	NA
TPH-g	6.2E+02	NA

Notes:
Source = Cal/EPA HHRA Note No. 10, 2025
NA = Not applicable or not available

Table J-7: Estimated Cumulative Risks and Hazards, Multi-Pathway Soil Exposures - School Exposure Scenario

COPC	School Exposure Scenario				
	School EPC (mg/kg)	Cancer Risk		Hazard Index	
		Staff	Student	Staff	Student
Metals					
Antimony	4	--	--	1.E-02	1.E-02
Barium	240	--	--	1.E-03	2.E-03
Beryllium	0.72	1.E-10	7.E-12	3.E-03	4.E-03
Cadmium	0.78	2.E-10	1.E-11	7.E-03	8.E-03
Chromium (III)	79	--	--	5.E-05	6.E-05
Chromium (VI)	1.3	2.E-07	3.E-08	1.E-03	2.E-03
Cobalt	20	1.E-08	7.E-10	6.E-02	8.E-02
Copper	94	--	--	2.E-03	3.E-03
Nickel	96	2.E-09	1.E-10	1.E-02	1.E-02
Mercury	1.7	--	--	1.E-02	1.E-02
Molybdenum	1.6	--	--	3.E-04	4.E-04
Silver	21	--	--	4.E-03	5.E-03
Vanadium	54	--	--	1.E-02	1.E-02
Zinc	1600	--	--	5.E-03	7.E-03
Pesticides					
4,4'-DDT	0.015	3.E-09	4.E-10	4.E-05	6.E-05
Dioxins					
Total Dioxins	3.0E-05	3.E-06	7.E-07	1.E-01	2.E-01
TPH					
TPH-d	120	--	--	1.E-02	2.E-02
TPH-mo	420	--	--	5.E-03	8.E-03
TOTAL RISKS and HAZARDS		**4.E-06**	**7.E-07**	**3.E-01**	**4.E-01**

Notes:

" -- " Not Applicable

Includes Incidental Soil Ingestion, Dermal Contact, and Fugitive Dust Inhalation.

EPC: Exposure Point Concentration in milligrams per kilogram used in the risk and hazard calculations

Table J-8: Estimated Cumulative Risks and Hazards, Multi-Pathway Soil Exposures - Hypothetical Residential Exposure Scenario

COPC	Residential Exposure Scenario		
	Maximum Detected Concentration (mg/kg)	Cancer Risk	Hazard Index
		Adult & Child	Child
Metals			
Antimony	290	--	9.E+00
Barium	4900	--	3.E-01
Beryllium	1.1	7.E-10	7.E-02
Cadmium	180	2.E-07	2.E+01
Chromium (VI)	1.7	1.E-06	2.E-02
Cobalt	82	2.E-07	4.E+00
Copper	6400	--	2.E+00
Nickel	490	3.E-08	6.E-01
Mercury	15	--	1.E+00
Molybdenum	29	--	8.E-02
Selenium	9.8	--	3.E-02
Silver	21	--	5.E-02
Thallium	16	--	2.E+01
Vanadium	190	--	5.E-01
Zinc	13000	--	6.E-01
Pesticides			
4,4'-DDT	0.015	8.E-09	4.E-04
4,4'-DDD	0.014	6.E-09	4.E-04
Chlordane	0.3	2.E-07	9.E-03
PCBs			
Aroclor-1248	0.14	6.E-07	--
Aroclor-1260	0.098	4.E-07	--
Aroclor-1268	0.071	3.E-07	--
SVOCs			
1-Methylnaphthalene	0.39	4.E-08	2.E-04
2-Methylnaphthalene	0.23	--	1.E-03
Naphthalene	0.2	5.E-08	2.E-04
Acenaphthylene	0.38	--	1.E-04
Acenaphthene	0	--	--
Fluorene	0.11	--	5.E-05
Phenanthrene	0.61	--	3.E-04
Anthracene	0.026	--	2.E-06
Fluoranthene	1.1	--	5.E-04
Pyrene	1.9	--	1.E-03
Benzo(a)anthracene	0.57	1.E-07	--
Chrysene	0.92	2.E-09	--
Benzo(b)fluoroanthene	1.6	3.E-07	--
Benzo(k)fluoroanthene	0.54	1.E-08	--
Benzo(a)pyrene	1.7	3.E-06	1.E-01
Indeno(1,2,3-cd)pyrene	1.1	2.E-07	--
Dibenz(a,h)anthracene	0.21	2.E-06	--
Dioxins			
Total Dioxins	1.47E-04	4.E-05	4.E+00
TPH			
TPH-g	1700	--	7.E-01
TPH-d	3200	--	3.E+00
TPH-mo	6000	--	6.E-01
TOTAL RISKS and HAZARDS		**4.E-05**	**7.E+01**

Notes:

" -- " = Not Applicable

mg/kg = milligrams per kilogram

Includes Incidental Soil Ingestion, Dermal Contact, and Fugitive Dust Inhalation

EPC: Exposure Point Concentration in milligrams per kilogram used in the risk and hazard calculations

Table J-9: Health Hazards from Inhalation of Indoor Air - School Staff Exposure Scenario

Chemical	Estimated Indoor Air Conc. (ug/m^3)	Inhalation Reference Concentration (ug/m^3)	School Staff Exposure Scenario	
			Average Exposure Conc_nc (ug/m^3)	Hazard Quotient (Unitless)
1,2-Dichlorobenzene	2.5E-02	2.0E+02	5.7E-03	3.E-05
1,2-Dichloroethane	7.6E-02	7.0E+00	1.7E-02	2.E-03
1,2,4-Trimethylbenzene	3.0E-02	6.0E+01	6.9E-03	1.E-04
1,4-Dioxane	4.7E-02	3.0E+01	1.1E-02	4.E-04
2-Butanone	2.9E-01	5.0E+03	6.7E-02	1.E-05
2,2,4-Trimethylpentane	3.0E-02	6.0E+01	6.9E-03	1.E-04
4-Ethyltoluene	2.8E-02	1.0E+02	6.3E-03	6.E-05
4-Methyl-2-pentanone	1.8E-01	3.0E+03	4.1E-02	1.E-05
Acetone	4.9E+00	3.1E+04	1.1E+00	4.E-05
Benzene	5.3E-02	3.0E+00	1.2E-02	4.E-03
Carbon Disulfide	5.1E-02	7.0E+02	1.2E-02	2.E-05
Chloroform	1.2E-02	2.0E+00	2.8E-03	1.E-03
Dichlorodifluoromethane	2.3E-02	1.0E+02	5.3E-03	5.E-05
Ethylbenzene	1.3E-01	1.0E+03	3.0E-02	3.E-05
Hexanes	1.3E-01	7.0E+02	3.0E-02	4.E-05
Styrene	1.4E-01	9.0E+02	3.2E-02	4.E-05
Tetrachloroethene	8.9E-02	4.0E+01	2.0E-02	5.E-04
Tetrahydrofuran	6.0E-02	2.0E+03	1.4E-02	7.E-06
Toluene	2.0E-01	4.2E+02	4.5E-02	1.E-04
Vinyl Chloride	3.3E-03	5.1E+01	7.5E-04	1.E-05
Xylenes, total	6.4E-01	1.0E+02	1.5E-01	1.E-03
Total Hazard Index				**1.E-02**

Notes:

ug/m^3 = Micrograms per cubic meter

NA = Not applicable or not available

Table J-10: Health Hazards from Inhalation of Indoor Air - School Students Exposure Scenario

Chemical	Estimated Indoor Air Conc. (ug/m^3)	Inhalation Reference Concentration (ug/m^3)	School Exposure Scenario	
			Average Exposure Conc_nc (ug/m^3)	Hazard Quotient (Unitless)
			Student	Student
1,2-Dichlorobenzene	2.5E-02	2.0E+02	3.1E-03	2.E-05
1,2-Dichloroethane	7.6E-02	7.0E+00	9.3E-03	1.E-03
1,2,4-Trimethylbenzene	3.0E-02	6.0E+01	3.7E-03	6.E-05
1,4-Dioxane	4.7E-02	3.0E+01	5.8E-03	2.E-04
2-Butanone	2.9E-01	5.0E+03	3.6E-02	7.E-06
2,2,4-Trimethylpentane	3.0E-02	6.0E+01	3.7E-03	6.E-05
4-Ethyltoluene	2.8E-02	1.0E+02	3.4E-03	3.E-05
4-Methyl-2-pentanone	1.8E-01	3.0E+03	2.2E-02	7.E-06
Acetone	4.9E+00	3.1E+04	6.0E-01	2.E-05
Benzene	5.3E-02	3.0E+00	6.6E-03	2.E-03
Carbon Disulfide	5.1E-02	7.0E+02	6.2E-03	9.E-06
Chloroform	1.2E-02	2.0E+00	1.5E-03	8.E-04
Dichlorodifluoromethane	2.3E-02	1.0E+02	2.8E-03	3.E-05
Ethylbenzene	1.3E-01	1.0E+03	1.6E-02	2.E-05
Hexanes	1.3E-01	7.0E+02	1.6E-02	2.E-05
Styrene	1.4E-01	9.0E+02	1.8E-02	2.E-05
Tetrachloroethene	8.9E-02	4.0E+01	1.1E-02	3.E-04
Tetrahydrofuran	6.0E-02	2.0E+03	7.3E-03	4.E-06
Toluene	2.0E-01	4.2E+02	2.4E-02	6.E-05
Vinyl Chloride	3.3E-03	5.1E+01	4.1E-04	8.E-06
Xylenes, total	6.4E-01	1.0E+02	7.9E-02	8.E-04
Total Hazard Index				**6.E-03**

Notes:

ug/m^3 = Micrograms per cubic meter

NA = Not applicable or not available

Table J-11: Health Hazards from Inhalation of Indoor Air - Hypothetical Residential Exposure Scenario

COPC	Indoor Air Conc. (ug/m^3)	Inhalation Reference Dose (ug/m^3)	Residential Exposure Scenario		
			Average Exposure Conc_nc (ug/m^3)		Hazard Quotient (Unitless)
			Adult Res.	Child Res.	Child Res.
1,1,1-Trichloroethane	3.3E+00	1.0E+03	3.2E+00	3.2E+00	3.E-03
1,2-Dichlorobenzene	8.4E-02	2.0E+02	8.1E-02	8.1E-02	4.E-04
1,2-Dichloroethane	2.6E-01	7.0E+00	2.4E-01	2.4E-01	3.E-02
1,2,4-Trimethylbenzene	1.1E+00	6.0E+01	1.0E+00	1.0E+00	2.E-02
1,3,5-Trimethylbenzene	8.4E-01	6.0E+01	8.1E-01	8.1E-01	1.E-02
1,4-Dichlorobenzene	2.1E-01	8.0E+02	2.0E-01	2.0E-01	3.E-04
1,4-Dioxane	1.6E-01	3.0E+01	1.5E-01	1.5E-01	5.E-03
2-Butanone	9.9E-01	5.0E+03	9.5E-01	9.5E-01	2.E-04
2,2,4-Trimethylpentane	5.1E-01	6.0E+01	4.9E-01	4.9E-01	8.E-03
4-Ethyltoluene	9.3E-02	1.0E+02	8.9E-02	8.9E-02	9.E-04
4-Methyl-2-pentanone	6.0E-01	3.0E+03	5.8E-01	5.8E-01	2.E-04
Acetone	1.7E+01	3.1E+04	1.6E+01	1.6E+01	5.E-04
Benzene	5.1E-01	3.0E+00	4.9E-01	4.9E-01	2.E-01
Carbon Disulfide	5.4E-01	7.0E+02	5.2E-01	5.2E-01	7.E-04
Chlorobenzene	4.5E-01	5.0E+01	4.3E-01	4.3E-01	9.E-03
Chloroform	4.5E-02	2.0E+00	4.3E-02	4.3E-02	2.E-02
Isopropylbenzene	1.6E+00	4.0E+02	1.5E+00	1.5E+00	4.E-03
Ethylbenzene	8.1E+00	1.0E+03	7.8E+00	7.8E+00	8.E-03
Freons	1.4E+00	5.0E+03	1.4E+00	1.4E+00	3.E-04
Hexanes	5.6E+01	7.0E+02	5.4E+01	5.4E+01	8.E-02
Naphthalene	2.2E-01	3.0E+00	2.1E-01	2.1E-01	7.E-02
Propylbenzene	3.6E-01	1.0E+03	3.5E-01	3.5E-01	3.E-04
Styrene	4.8E-01	9.0E+02	4.6E-01	4.6E-01	5.E-04
Tetrachloroethene	3.0E-01	4.0E+01	2.9E-01	2.9E-01	7.E-03
Tetrahydrofuran	2.0E-01	2.0E+03	1.9E-01	1.9E-01	1.E-04
Toluene	1.1E+00	4.2E+02	1.1E+00	1.1E+00	3.E-03
Trichloroethene	1.4E-01	2.0E+00	1.4E-01	1.4E-01	7.E-02
Vinyl Chloride	1.1E-02	5.1E+01	1.1E-02	1.1E-02	2.E-04
Xylenes, total	6.2E+00	1.0E+02	5.9E+00	5.9E+00	6.E-02
TPH-g	1.6E+03	6.2E+02	1.5E+03	1.5E+03	2.E+00
Total Hazard Index					**3.E+00**

Notes:
ug/m^3 = micrograms per cubic meter
COPC = chemical of potential concern
NA = Not applicable or not available
NE = Not evaluated

Table J-12: Cancer Risks from Inhalation of Indoor Air - School Staff Exposure Scenario

Chemical	Estimated Indoor Air Conc. (ug/m^3)	Inhalation Unit Risk (ug/m^3)$^{-1}$	School Staff Exposure Scenario	
			Lifetime Exposure Conc_c (ug/m^3)	Cancer Risk (Unitless)
1,2-Dichlorobenzene	2.5E-02	NA	2.0E-03	NA
1,2-Dichloroethane	7.6E-02	2.6E-05	6.2E-03	2.E-07
1,2,4-Trimethylbenzene	3.0E-02	NA	2.5E-03	NA
1,4-Dioxane	4.7E-02	5.0E-06	3.8E-03	2.E-08
2-Butanone	2.9E-01	NA	2.4E-02	NA
2,2,4-Trimethylpentane	3.0E-02	NA	2.5E-03	NA
4-Ethyltoluene	2.8E-02	NA	2.2E-03	NA
4-Methyl-2-pentanone	1.8E-01	NA	1.4E-02	NA
Acetone	4.9E+00	NA	4.0E-01	NA
Benzene	5.3E-02	2.9E-05	4.3E-03	1.E-07
Carbon Disulfide	5.1E-02	NA	4.1E-03	NA
Chloroform	1.2E-02	2.3E-05	1.0E-03	2.E-08
Dichlorodifluoromethane	2.3E-02	NA	1.9E-03	NA
Ethylbenzene	1.3E-01	2.5E-06	1.1E-02	3.E-08
Hexanes	1.3E-01	NA	1.1E-02	NA
Styrene	1.4E-01	NA	1.2E-02	NA
Tetrachloroethene	8.9E-02	6.1E-06	7.2E-03	4.E-08
Tetrahydrofuran	6.0E-02	NA	4.9E-03	NA
Toluene	2.0E-01	NA	1.6E-02	NA
Vinyl Chloride	3.3E-03	7.8E-05	2.7E-04	2.E-08
Xylenes, total	6.4E-01	NA	5.2E-02	NA
Total Cancer Risk				**4.E-07**

Notes:

ug/m^3 = Micrograms per cubic meter

NA = Not applicable or not available

Table J-13: Cancer Risks from Inhalation of Indoor Air - School Student Exposure Scenario

Chemical	Estimated Indoor Air Conc. (ug/m^3)	Inhalation Unit Risk $(ug/m^3)^{-1}$	School Exposure Scenario	
			Lifetime Exposure Conc_c (ug/m^3)	Cancer Risk (Unitless)
			Student	Student
1,2-Dichlorobenzene	2.5E-02	NA	1.3E-04	NA
1,2-Dichloroethane	7.6E-02	2.6E-05	4.0E-04	1.E-08
1,2,4-Trimethylbenzene	3.0E-02	NA	1.6E-04	NA
1,4-Dioxane	4.7E-02	5.0E-06	2.5E-04	1.E-09
2-Butanone	2.9E-01	NA	1.5E-03	NA
2,2,4-Trimethylpentane	3.0E-02	NA	1.6E-04	NA
4-Ethyltoluene	2.8E-02	NA	1.5E-04	NA
4-Methyl-2-pentanone	1.8E-01	NA	9.4E-04	NA
Acetone	4.9E+00	NA	2.6E-02	NA
Benzene	5.3E-02	2.9E-05	2.8E-04	8.E-09
Carbon Disulfide	5.1E-02	NA	2.7E-04	NA
Chloroform	1.2E-02	2.3E-05	6.6E-05	2.E-09
Dichlorodifluoromethane	2.3E-02	NA	1.2E-04	NA
Ethylbenzene	1.3E-01	2.5E-06	7.0E-04	2.E-09
Hexanes	1.3E-01	NA	7.0E-04	NA
Styrene	1.4E-01	NA	7.5E-04	NA
Tetrachloroethene	8.9E-02	6.1E-06	4.7E-04	3.E-09
Tetrahydrofuran	6.0E-02	NA	3.1E-04	NA
Toluene	2.0E-01	NA	1.0E-03	NA
Vinyl Chloride	3.3E-03	7.8E-05	1.7E-05	1.E-09
Xylenes, total	6.4E-01	NA	3.4E-03	NA
Total Cancer Risk				**3.E-08**

Notes:

ug/m^3 = Micrograms per cubic meter

NA = Not applicable or not available

Table J-14: Cancer Risks from Inhalation of Indoor Air - Hypothetical Residential Exposure Scenario

COPC	Indoor Air Conc. (ug/m^3)	Inhalation Slope Factor $(ug/m^3)^{-1}$	Residential Exposure Scenario		
			Lifetime Exposure Conc_c (ug/m^3)		Cancer Risk (unitless)
			Adult Resident	Child Resident	Adult & Child
1,1,1-Trichloroethane	3.3E+00	NA	9.0E-01	2.7E-01	NA
1,2-Dichlorobenzene	8.4E-02	NA	2.3E-02	6.9E-03	NA
1,2-Dichloroethane	2.6E-01	2.6E-05	7.0E-02	2.1E-02	2.E-06
1,2,4-Trimethylbenzene	1.1E+00	NA	3.0E-01	8.9E-02	NA
1,3,5-Trimethylbenzene	8.4E-01	NA	2.3E-01	6.9E-02	NA
1,4-Dichlorobenzene	2.1E-01	1.1E-05	5.8E-02	1.7E-02	8.E-07
1,4-Dioxane	1.6E-01	5.0E-06	4.4E-02	1.3E-02	3.E-07
2-Butanone	9.9E-01	NA	2.7E-01	8.1E-02	NA
2,2,4-Trimethylpentane	5.1E-01	NA	1.4E-01	4.2E-02	NA
4-Ethyltoluene	9.3E-02	NA	2.5E-02	7.6E-03	NA
4-Methyl-2-pentanone	6.0E-01	NA	1.6E-01	4.9E-02	NA
Acetone	1.7E+01	NA	4.5E+00	1.4E+00	NA
Benzene	5.1E-01	2.9E-05	1.4E-01	4.2E-02	5.E-06
Carbon Disulfide	5.4E-01	NA	1.5E-01	4.4E-02	NA
Chlorobenzene	4.5E-01	NA	1.2E-01	3.7E-02	NA
Chloroform	4.5E-02	2.3E-05	1.2E-02	3.7E-03	4.E-07
Isopropylbenzene	1.6E+00	NA	4.4E-01	1.3E-01	NA
Ethylbenzene	8.1E+00	2.5E-06	2.2E+00	6.7E-01	7.E-06
Freons	1.4E+00	NA	3.9E-01	1.2E-01	NA
Hexanes	5.6E+01	NA	1.5E+01	4.6E+00	NA
Naphthalene	2.2E-01	3.4E-05	5.9E-02	1.8E-02	3.E-06
Propylbenzene	3.6E-01	NA	9.9E-02	3.0E-02	NA
Styrene	4.8E-01	NA	1.3E-01	3.9E-02	NA
Tetrachloroethene	3.0E-01	6.1E-06	8.2E-02	2.5E-02	7.E-07
Tetrahydrofuran	2.0E-01	NA	5.5E-02	1.7E-02	NA
Toluene	1.1E+00	NA	3.1E-01	9.4E-02	NA
Trichloroethene	1.4E-01	4.1E-06	3.9E-02	1.2E-02	2.E-07
Vinyl Chloride	1.1E-02	7.8E-05	3.0E-03	9.1E-04	3.E-07
Xylenes, total	6.2E+00	NA	1.7E+00	5.1E-01	NA
TPH-g	1.6E+03	NA	4.4E+02	1.3E+02	NA
Total Cancer Risk					**2.E-05**

Notes:

ug/m^3 = micrograms per cubic meter

COPC = chemical of potential concern

NA = Not applicable or not available

NE = Not evaluated

APPENDIX J – Attachment A

Human Health Risk Assessment Supporting Calculations Tables: School Exposure Scenario

HHRA Appendix A, Table A-1
Health Hazards from Incidental Soil Ingestion - School Exposure Scenario

COPC	Exposure Point Concentration (mg/kg)	Oral Reference Dose (mg/kg-d)	School Exposure Scenario			
			Average Daily Intake (mg/kg-d)		Hazard Quotient (Unitless)	
			Staff	Student	Staff	Student
Metals						
Antimony	4	4.0E-04	3.4E-06	4.1E-06	8.6E-03	1.0E-02
Barium	240	2.0E-01	2.1E-04	2.5E-04	1.0E-03	1.2E-03
Beryllium	0.72	2.0E-04	6.2E-07	7.4E-07	3.1E-03	3.7E-03
Cadmium	0.78	1.0E-04	6.7E-07	8.0E-07	6.7E-03	8.0E-03
Chromium (III)	79	1.5E+00	6.8E-05	8.1E-05	4.5E-05	5.4E-05
Chromium (VI)	1.3	9.0E-04	1.1E-06	1.3E-06	1.2E-03	1.5E-03
Cobalt	20	3.0E-04	1.7E-05	2.1E-05	5.7E-02	6.9E-02
Copper	94	4.0E-02	8.0E-05	9.7E-05	2.0E-03	2.4E-03
Nickel	96	1.1E-02	8.2E-05	9.9E-05	7.5E-03	9.0E-03
Mercury	1.7	1.6E-04	1.5E-06	1.8E-06	9.1E-03	1.1E-02
Molybdenum	1.6	5.0E-03	1.4E-06	1.6E-06	2.7E-04	3.3E-04
Silver	21	5.0E-03	1.8E-05	2.2E-05	3.6E-03	4.3E-03
Vanadium	54	5.0E-03	4.6E-05	5.6E-05	9.2E-03	1.1E-02
Zinc	1600	3.0E-01	1.4E-03	1.6E-03	4.6E-03	5.5E-03
Pesticides						
4,4'-DDT	0.015	5.0E-04	1.3E-08	1.5E-08	2.6E-05	3.1E-05
Dioxins						
Total Dioxins*	0.0000303	7.0E-10	2.6E-11	3.1E-11	3.7E-02	4.5E-02
TPH						
TPH-d	120	1.9E-02	1.0E-04	1.2E-04	5.4E-03	6.5E-03
TPH-mo	420	1.5E-01	3.6E-04	4.3E-04	2.4E-03	2.9E-03
Total Hazard Index					**1.6E-01**	**1.9E-01**

Notes:
NA = not applicable or not available
* = Toxicity data for 2,3,7,8-TCDD
Equations:

$$Construction\ Worker\ Intake_{Noncancer}\left(\frac{mg}{kg}day\right) = \frac{CS \times IR_{iw} \times FE \times EF_{iw} \times ED_{iw} \times CF}{BW_{iw} \times AT_{noncancer}}$$

$$Non-Intrusive\ Worker\ Intake_{Noncancer}\left(\frac{mg}{kg}day\right) = \frac{CS \times IR_{Scw} \times FE \times EF_{cw} \times ED_{cw} \times CF}{BW_{cw} \times AT_{noncancer}}$$

$$Noncancer\ Hazard = \frac{Intake_{noncancer}}{RfD}$$

HHRA Appendix A, Table A-2
Health Hazards from Dermal Contact with Soil - School Exposure Scenario

COPC	Exposure Point Concentration (mg/kg)	Soil-to-Skin Absorption Factor (unitless)	Oral/Dermal Reference Dose (mg/kg-d)	School Exposure Scenario			
				Average Daily Intake (mg/kg-d)	Average Daily Intake (mg/kg-d)	Hazard Quotient (unitless)	
				Staff	Student	Staff	Student
Metals							
Antimony	4	0.01	4.0E-04	4.1E-07	7.8E-07	1.0E-03	2.0E-03
Barium	240	0.01	2.0E-01	2.5E-05	4.7E-05	1.2E-04	2.3E-04
Beryllium	0.72	0.01	2.0E-04	7.4E-08	1.4E-07	3.7E-04	7.0E-04
Cadmium	0.78	0.001	1.0E-04	8.1E-09	1.5E-08	8.1E-05	1.5E-04
Chromium (III)	79	0.01	1.5E+00	8.2E-06	1.5E-05	5.4E-06	1.0E-05
Chromium (VI)	1.3	0.01	9.0E-04	1.3E-07	2.5E-07	1.5E-04	2.8E-04
Cobalt	20	0.01	3.0E-04	2.1E-06	3.9E-06	6.9E-03	1.3E-02
Copper	94	0.01	4.0E-02	9.7E-06	1.8E-05	2.4E-04	4.6E-04
Nickel	96	0.01	1.1E-02	9.9E-06	1.9E-05	9.0E-04	1.7E-03
Mercury	1.7	0.01	1.6E-04	1.8E-07	3.3E-07	1.1E-03	2.1E-03
Molybdenum	1.6	0.01	5.0E-03	1.7E-07	3.1E-07	3.3E-05	6.3E-05
Silver	21	0.01	5.0E-03	2.2E-06	4.1E-06	4.3E-04	8.2E-04
Vanadium	54	0.01	5.0E-03	5.6E-06	1.1E-05	1.1E-03	2.1E-03
Zinc	1600	0.01	3.0E-01	1.7E-04	3.1E-04	5.5E-04	1.0E-03
Pesticides							
4,4'-DDT	0.015	0.05	5.0E-04	7.7E-09	1.5E-08	1.5E-05	2.9E-05
Dioxins							
Total Dioxins*	0.0000303	0.15	7.0E-10	4.7E-11	8.9E-11	6.7E-02	1.3E-01
TPH							
TPH-d	120	0.1	1.9E-02	1.2E-04	2.3E-04	6.5E-03	1.2E-02
TPH-mo	420	0.1	1.5E-01	4.3E-04	8.2E-04	2.9E-03	5.5E-03
Total Hazard Index						**9.0E-02**	**1.7E-01**

Notes:

NA = not applicable or not available

* = Toxicity data for 2,3,7,8-TCDD

Equations:

$$Construction\ Worker\ Intake_{Noncancer}\left(\frac{mg}{kg}day\right) = \frac{CS \times SA_{iw} \times AF_{iw} \times ABS \times FE \times EF_{iw} \times ED_{iw} \times CF}{BW_{iw} \times AT_{noncancer}}$$

$$Non-Intrusive\ Worker\ Intake_{Noncancer}\left(\frac{mg}{kg}day\right) = \frac{CS \times SA_{cw} \times AF_{cw} \times ABS \times FE \times EF_{cw} \times ED_{cw} \times CF}{BW_{cw} \times AT_{noncancer}}$$

$$Noncancer\ Hazard = \frac{Intake_{noncancer}}{RfD}$$

HHRA Appendix A, Table A-3
Health Hazards from Inhalation of Outdoor Air - School Exposure Scenario

COPC	Exposure Point Concentration (mg/kg)	Inhalation Reference Concentration (ug/m^3)	School Exposure Scenario			
			Average Daily Intake (mg/kg-d)	Average Daily Intake (mg/kg-d)	Hazard Quotient (unitless)	
			Staff	Student	Staff	Student
Metals						
Antimony	4	3.0E-01	6.9E-07	3.7E-07	2.3E-06	1.2E-06
Barium	240	5.0E-01	4.2E-05	2.2E-05	8.3E-05	4.5E-05
Beryllium	0.72	7.0E-03	1.2E-07	6.7E-08	1.8E-05	9.6E-06
Cadmium	0.78	1.0E-02	1.4E-07	7.3E-08	1.4E-05	7.3E-06
Chromium (III)	79	NA	1.4E-05	7.4E-06	NA	NA
Chromium (VI)	1.3	3.0E-02	2.3E-07	1.2E-07	7.5E-06	4.1E-06
Cobalt	20	6.0E-03	3.5E-06	1.9E-06	5.8E-04	3.1E-04
Copper	94	NA	1.6E-05	8.8E-06	NA	NA
Nickel	96	1.4E-02	1.7E-05	9.0E-06	1.2E-03	6.4E-04
Mercury	1.7	3.0E-02	2.9E-07	1.6E-07	9.8E-06	5.3E-06
Molybdenum	1.6	2.0E+00	2.8E-07	1.5E-07	1.4E-07	7.5E-08
Silver	21	NA	3.6E-06	2.0E-06	NA	NA
Vanadium	54	1.0E-01	9.4E-06	5.1E-06	9.4E-05	5.1E-05
Zinc	1600	NA	2.8E-04	1.5E-04	NA	NA
Pesticides						
4,4'-DDT	0.015	NA	2.6E-09	1.4E-09	NA	NA
Dioxins						
Total Dioxins*	0.0000303	4.0E-05	5.3E-12	2.8E-12	1.3E-07	7.1E-08
TPH						
TPH-d	120	1.9E+02	2.1E-05	1.1E-05	1.1E-07	5.9E-08
TPH-mo	420	NA	7.3E-05	3.9E-05	NA	NA
Total Hazard Index					**2.0E-03**	**1.1E-03**

Notes:
NA = not applicable or not available
* = Toxicity data for 2,3,7,8-TCDD
Intake Equations:

$$Intake\ (\frac{ug}{m3}) = \frac{CS \times ET \times EF \times ED}{VF \times AT_{noncancer}}$$

$$Noncancer\ Hazard = \frac{Intake_{noncancer}}{RfC}$$

HHRA Appendix A, Table A-4
Cumulative Health Hazards from Multipathway Soil Exposure - School Exposure Scenario

COPC	Exposure Point Conc. (mg/kg)	School Exposure Scenario							
		School Staff				School Student			
		Ingestion	Dermal	Inhalation	Total HI	Ingestion	Dermal	Inhalation	Total HI
Metals									
Antimony	4	8.6E-03	1.0E-03	2.3E-06	9.6E-03	1.0E-02	2.0E-03	1.2E-06	1.2E-02
Barium	240	1.0E-03	1.2E-04	8.3E-05	1.2E-03	1.2E-03	2.3E-04	4.5E-05	1.5E-03
Beryllium	0.72	3.1E-03	3.7E-04	1.8E-05	3.5E-03	3.7E-03	7.0E-04	9.6E-06	4.4E-03
Cadmium	0.78	6.7E-03	8.1E-05	1.4E-05	6.8E-03	8.0E-03	1.5E-04	7.3E-06	8.2E-03
Chromium (III)	79	4.5E-05	5.4E-06	NA	5.1E-05	5.4E-05	1.0E-05	NA	6.5E-05
Chromium (VI)	1.3	1.2E-03	1.5E-04	7.5E-06	1.4E-03	1.5E-03	2.8E-04	4.1E-06	1.8E-03
Cobalt	20	5.7E-02	6.9E-03	5.8E-04	6.5E-02	6.9E-02	1.3E-02	3.1E-04	8.2E-02
Copper	94	2.0E-03	2.4E-04	NA	2.3E-03	2.4E-03	4.6E-04	NA	2.9E-03
Nickel	96	7.5E-03	9.0E-04	1.2E-03	9.6E-03	9.0E-03	1.7E-03	6.4E-04	1.1E-02
Mercury	1.7	9.1E-03	1.1E-03	9.8E-06	1.0E-02	1.1E-02	2.1E-03	5.3E-06	1.3E-02
Molybdenum	1.6	2.7E-04	3.3E-05	1.4E-07	3.1E-04	3.3E-04	6.3E-05	7.5E-08	3.9E-04
Silver	21	3.6E-03	4.3E-04	NA	4.0E-03	4.3E-03	8.2E-04	NA	5.1E-03
Vanadium	54	9.2E-03	1.1E-03	9.4E-05	1.0E-02	1.1E-02	2.1E-03	5.1E-05	1.3E-02
Zinc	1600	4.6E-03	5.5E-04	NA	5.1E-03	5.5E-03	1.0E-03	NA	6.5E-03
Pesticides									
4,4'-DDT	0.015	2.6E-05	1.5E-05	NA	4.1E-05	3.1E-05	2.9E-05	NA	6.0E-05
Dioxins									
Total Dioxins*	0.0000303	3.7E-02	6.7E-02	1.3E-07	1.0E-01	4.5E-02	1.3E-01	7.1E-08	1.7E-01
TPH									
TPH-d	120	5.4E-03	6.5E-03	1.1E-07	1.2E-02	6.5E-03	1.2E-02	5.9E-08	1.9E-02
TPH-mo	420	2.4E-03	2.9E-03	NA	5.3E-03	2.9E-03	5.5E-03	NA	8.4E-03
Total Hazard Index					**2.5E-01**				**3.6E-01**

Notes:
NA = not applicable or not available
* = Toxicity data for 2,3,7,8-TCDD

HHRA Appendix A, Table A-5
Cancer Risks from Incidental Soil Ingestion - School Exposure Scenario

COPC	Exposure Point Concentration (mg/kg)	Oral Slope Factor $(mg/kg\text{-}d)^{-1}$	School Exposure Scenario			
			Average Daily Intake (mg/kg-d)		Cancer Risk (Unitless)	
			Staff	Student	Steff	Student
Metals						
Antimony	4	NA	1.2E-06	1.8E-07	NA	NA
Barium	240	NA	7.3E-05	1.1E-05	NA	NA
Beryllium	0.72	NA	2.2E-07	3.2E-08	NA	NA
Cadmium	0.78	NA	2.4E-07	3.4E-08	NA	NA
Chromium (III)	79	NA	2.4E-05	3.5E-06	NA	NA
Chromium (VI)	1.3	5.0E-01	4.0E-07	5.7E-08	2.0E-07	2.9E-08
Cobalt	20	NA	6.1E-06	8.8E-07	NA	NA
Copper	94	NA	2.9E-05	4.1E-06	NA	NA
Nickel	96	NA	2.9E-05	4.2E-06	NA	NA
Mercury	1.7	NA	5.2E-07	7.5E-08	NA	NA
Molybdenum	1.6	NA	4.9E-07	7.1E-08	NA	NA
Silver	21	NA	6.4E-06	9.3E-07	NA	NA
Vanadium	54	NA	1.7E-05	2.4E-06	NA	NA
Zinc	1600	NA	4.9E-04	7.1E-05	NA	NA
Pesticides						
4,4'-DDT	0.015	3.4E-01	4.6E-09	6.6E-10	1.6E-09	2.3E-10
Dioxins						
Total Dioxins*	0.0000303	1.3E+05	9.3E-12	1.3E-12	1.2E-06	1.7E-07
TPH						
TPH-d	120	NA	3.7E-05	5.3E-06	NA	NA
TPH-mo	420	NA	1.3E-04	1.9E-05	NA	NA
Total Cancer Risk					**1.4E-06**	**2.0E-07**

Notes:
NA = not applicable or not available
* = Toxicity data for 2,3,7,8-TCDD
Equations:

$$Construction\ Worker\ Intake_{cancer}\left(\frac{mg}{kg}day\right) = \frac{CS \times IR{\sim}S_{iw} \times FE \times EF_{iw} \times ED_{iw} \times CF}{BW_{iw} \times AT_{cancer}}$$

$$Non-Intrusive\ Worker\ Intake_{cancer}\left(\frac{mg}{kg}day\right) = \frac{CS \times IR_{Scw} \times FE \times EF_{cw} \times ED_{cw} \times CF}{BW_{cw} \times AT_{cancer}}$$

$$Cancer\ Risk = Intake_{cancer} \times CSF$$

HHRA Appendix A, Table A-6
Cancer Risks from Dermal Contact with Soil - School Exposure Scenario

COPC	Exposure Point Concentration (mg/kg)	Soil-to-Skin Absorption Factor (unitless)	Oral/Dermal Slope Factor $(mg/kg\text{-}d)^{-1}$	School Exposure Scenario			
				Average Daily Intake (mg/kg-d)		Cancer Risk (Unitless)	
				Staff	Student	Staff	Student
Metals							
Antimony	4	0.01	NA	1.5E-07	3.4E-08	NA	NA
Barium	240	0.01	NA	8.9E-06	2.0E-06	NA	NA
Beryllium	0.72	0.01	NA	2.7E-08	6.0E-09	NA	NA
Cadmium	0.78	0.001	NA	2.9E-09	6.5E-10	NA	NA
Chromium (III)	79	0.01	NA	2.9E-06	6.6E-07	NA	NA
Chromium (VI)	1.3	0.01	5.0E-01	4.8E-08	1.1E-08	2.4E-08	5.4E-09
Cobalt	20	0.01	NA	7.4E-07	1.7E-07	NA	NA
Copper	94	0.01	NA	3.5E-06	7.9E-07	NA	NA
Nickel	96	0.01	NA	3.5E-06	8.0E-07	NA	NA
Mercury	1.7	0.01	NA	6.3E-08	1.4E-08	NA	NA
Molybdenum	1.6	0.01	NA	5.9E-08	1.3E-08	NA	NA
Silver	21	0.01	NA	7.7E-07	1.8E-07	NA	NA
Vanadium	54	0.01	NA	2.0E-06	4.5E-07	NA	NA
Zinc	1600	0.01	NA	5.9E-05	1.3E-05	NA	NA
Pesticides							
4,4'-DDT	0.015	0.05	3.4E-01	2.8E-09	6.3E-10	9.4E-10	2.1E-10
Dioxins							
Total Dioxins*	0.0000303	0.15	1.3E+05	1.7E-11	3.8E-12	2.2E-06	4.9E-07
TPH							
TPH-d	120	0.1	NA	4.4E-05	1.0E-05	NA	NA
TPH-mo	420	0.1	NA	1.5E-04	3.5E-05	NA	NA
Total Cancer Risk						**2.2E-06**	**5.0E-07**

Notes:
NA = not applicable or not available
* = Toxicity data for 2,3,7,8-TCDD
Equations:

$$Construction\ Worker\ Intake_{cancer}\left(\frac{mg}{kg}day\right) = \frac{CS \times SA_{iw} \times AF_{iw} \times ABS \times FE \times EF_{iw} \times ED_{iw} \times CF}{BW_{iw} \times AT_{cancer}}$$

$$Non-Intrusive\ Worker\ Intake_{cancer}\left(\frac{mg}{kg}day\right) = \frac{CS \times SA_{cw} \times AF_{cw} \times ABS \times FE \times EF_{cw} \times ED_{cw} \times CF}{BW_{cw} \times AT_{cancer}}$$

$$Cancer\ Risk = Intake_{cancer} \times CSF$$

HHRA Appendix A, Table A-7
Cancer Risks from Inhalation of Outdoor Air - School Exposure Scenario

COPC	Exposure Point Concentration (mg/kg)	Inhalation Unit Risk $(ug/m^3)^{-1}$	School Exposure Scenario			
			Average Daily Intake (ug/m^3)		Cancer Risk (Unitless)	
			Staff	Student	Staff	Student
Metals						
Antimony	4	NA	2.5E-07	1.6E-08	NA	NA
Barium	240	NA	1.5E-05	9.6E-07	NA	NA
Beryllium	0.72	2.4E-03	4.5E-08	2.9E-09	1.1E-10	6.9E-12
Cadmium	0.78	4.2E-03	4.8E-08	3.1E-09	2.0E-10	1.3E-11
Chromium (III)	79	NA	4.9E-06	3.2E-07	NA	NA
Chromium (VI)	1.3	1.5E-01	8.1E-08	5.2E-09	1.2E-08	7.8E-10
Cobalt	20	9.0E-03	1.2E-06	8.0E-08	1.1E-08	7.2E-10
Copper	94	NA	5.8E-06	3.8E-07	NA	NA
Nickel	96	2.6E-04	5.9E-06	3.9E-07	1.5E-09	1.0E-10
Mercury	1.7	NA	1.1E-07	6.8E-09	NA	NA
Molybdenum	1.6	NA	9.9E-08	6.4E-09	NA	NA
Silver	21	NA	1.3E-06	8.4E-08	NA	NA
Vanadium	54	NA	3.3E-06	2.2E-07	NA	NA
Zinc	1600	NA	9.9E-05	6.4E-06	NA	NA
Pesticides						
4,4'-DDT	0.015	9.7E-05	9.3E-10	6.0E-11	9.0E-14	5.8E-15
Dioxins						
Total Dioxins*	0.0000303	3.8E+01	1.9E-12	1.2E-13	7.1E-11	4.6E-12
TPH						
TPH-d	120	NA	7.4E-06	4.8E-07	NA	NA
TPH-mo	420	NA	2.6E-05	1.7E-06	NA	NA
Total Cancer Risk					**2.5E-08**	**1.6E-09**

Notes:
NA = not applicable or not available
* = Toxicity data for 2,3,7,8-TCDD
Equations:

$$VOC\ Exposure\ Concentration\ (\frac{ug}{m^3}) = \frac{CS \times EF \times ED \times ET}{VF \times AT_c}$$

$$Intake_{cancer}\left(\frac{mg}{kg}day\right) = \frac{CS \times EF_{iw} \times ED_{iw} \times \frac{1}{PEF} \times IR{\sim}A_{iw}}{BW_{iw} \times AT_{cancer}}$$

$$Cancer\ Risk = Intake_{cancer} \times CSF$$

$$Intake_{cancer}\left(\frac{mg}{kg}day\right) = \frac{CS \times EF_{cw} \times ED_{cw} \times \frac{1}{PEF} \times IR{\sim}A_{cw}}{BW_{cw} \times AT_{cancer}}$$

HHRA Appendix A, Table A-8
Cumulative Cancer Risks from Multipathway Soil Exposure - School Exposure Scenario

COPC	Exposure Point Conc. (mg/kg)	School Exposure Scenario							
		School Staff				School Student			
		Ingestion	Dermal	Inhalation	Total Risk	Ingestion	Dermal	Inhalation	Total Risk
Metals									
Antimony	4	NA	NA	NA	--	NA	NA	NA	--
Barium	240	NA	NA	NA	--	NA	NA	NA	--
Beryllium	0.72	NA	NA	1.1E-10	1.1E-10	NA	NA	6.9E-12	6.9E-12
Cadmium	0.78	NA	NA	2.0E-10	2.0E-10	NA	NA	1.3E-11	1.3E-11
Chromium (III)	79	NA	NA	NA	--	NA	NA	NA	--
Chromium (VI)	1.3	2.0E-07	2.4E-08	1.2E-08	2.3E-07	2.9E-08	5.4E-09	7.8E-10	3.5E-08
Cobalt	20	NA	NA	1.1E-08	1.1E-08	NA	NA	7.2E-10	7.2E-10
Copper	94	NA	NA	NA	--	NA	NA	NA	--
Nickel	96	NA	NA	1.5E-09	1.5E-09	NA	NA	1.0E-10	1.0E-10
Mercury	1.7	NA	NA	NA	--	NA	NA	NA	--
Molybdenum	1.6	NA	NA	NA	--	NA	NA	NA	--
Silver	21	NA	NA	NA	--	NA	NA	NA	--
Vanadium	54	NA	NA	NA	--	NA	NA	NA	--
Zinc	1600	NA	NA	NA	--	NA	NA	NA	--
Pesticides									
4,4'-DDT	0.015	1.6E-09	9.4E-10	9.0E-14	2.5E-09	2.3E-10	2.1E-10	5.8E-15	4.4E-10
Dioxins									
Total Dioxins*	0.0000303	1.2E-06	2.2E-06	7.1E-11	3.4E-06	1.7E-07	4.9E-07	4.6E-12	6.7E-07
TPH									
TPH-d	120	NA	NA	NA	--	NA	NA	NA	--
TPH-mo	420	NA	NA	NA	--	NA	NA	NA	--
Total Cancer Risk					**3.6E-06**				**7.0E-07**

Notes:

NA = not applicable or not available

* = Toxicity data for 2,3,7,8-TCDD

APPENDIX J – Attachment B

Human Health Risk Assessment Supporting Calculations Tables: Hypothetical Residential Exposure Scenario

HHRA Appendix B, Table B-1
Health Hazards from Incidental Soil Ingestion - Residential Exposure Scenario

COPC	Maximum Soil Concentration (mg/kg)	Oral Reference Dose (mg/kg-d)	Residential Scenario	
			Average Daily Intake (mg/kg-d)	Hazard Quotient (Unitless)
			Child	Child
Metals				
Antimony	290	4.0E-04	3.71E-03	9.27E+00
Barium	4900	2.0E-01	6.26E-02	3.13E-01
Beryllium	1.1	2.0E-04	1.41E-05	7.03E-02
Cadmium	180	1.0E-04	2.30E-03	2.30E+01
Chromium (VI)	1.7	9.0E-04	2.17E-05	2.42E-02
Cobalt	82	3.0E-04	1.05E-03	3.49E+00
Copper	6400	4.0E-02	8.18E-02	2.05E+00
Nickel	490	1.1E-02	6.26E-03	5.70E-01
Mercury	15	1.6E-04	1.92E-04	1.20E+00
Molybdenum	29	5.0E-03	3.71E-04	7.42E-02
Selenium	9.8	5.0E-03	1.25E-04	2.51E-02
Silver	21	5.0E-03	2.68E-04	5.37E-02
Thallium	16	1.0E-05	2.05E-04	2.05E+01
Vanadium	190	5.0E-03	2.43E-03	4.86E-01
Zinc	13000	3.0E-01	1.66E-01	5.54E-01
Pesticides				
4,4'-DDT	0.015	5.0E-04	1.92E-07	3.84E-04
4,4'-DDD	0.014	5.0E-04	1.79E-07	3.58E-04
Chlordane	0.3	5.0E-04	3.84E-06	7.67E-03
PCBs				
Aroclor-1248	0.14	NA	1.79E-06	NA
Aroclor-1260	0.098	NA	1.25E-06	NA
Aroclor-1268	0.071	NA	9.08E-07	NA
SVOCs				
1-Methylnaphthalene	0.39	7.0E-02	4.99E-06	7.12E-05
2-Methylnaphthalene	0.23	4.0E-03	2.94E-06	7.35E-04
Naphthalene	0.2	2.0E-02	2.56E-06	1.28E-04
Acenaphthylene	0.38	6.0E-02	4.86E-06	8.10E-05
Acenaphthene	0	6.0E-02	0.00E+00	0.00E+00
Fluorene	0.11	4.0E-02	1.41E-06	3.52E-05
Phenanthrene	0.61	4.0E-02	7.80E-06	1.95E-04
Anthracene	0.026	3.0E-01	3.32E-07	1.11E-06
Fluoranthene	1.1	4.0E-02	1.41E-05	3.52E-04
Pyrene	1.9	3.0E-02	2.43E-05	8.10E-04
Benzo(a)anthracene	0.57	NA	7.29E-06	NA
Chrysene	0.92	NA	1.18E-05	NA
Benzo(b)fluoroanthene	1.6	NA	2.05E-05	NA
Benzo(k)fluoroanthene	0.54	NA	6.90E-06	NA
Benzo(a)pyrene	1.7	3.0E-04	2.17E-05	7.25E-02
Indeno(1,2,3-cd)pyrene	1.1	NA	1.41E-05	NA
Dibenz(a,h)anthracene	0.21	NA	2.68E-06	NA
Dioxins				
Total Dioxins*	0.000147	7.0E-10	1.88E-09	2.68E+00
TPH				
TPH-g	1700	3.9E-02	2.17E-02	5.57E-01
TPH-d	3200	1.9E-02	4.09E-02	2.15E+00
TPH-mo	6000	1.5E-01	7.67E-02	5.11E-01
Total Hazard Index				**6.8E+01**

Notes:

NA = not applicable or not available

* = Toxicity data for 2,3,7,8-TCDD

Equations:

$$Child\ Intake_{Noncancer}\left(\frac{mg}{kg}day\right) = \frac{CS_{residential} \times IR{\sim}S_{child} \times EF_{child} \times ED_{child} \times CF}{BW_{child} \times AT_{noncancer}}$$

$$Noncancer\ Hazard = \frac{Intake_{noncancer}}{RfD}$$

HHRA Appendix B, Table B-2
Health Hazards from Dermal Contact with Soil - Residential Exposure Scenario

COPC	Maximum Soil Concentration (mg/kg)	Soil-to-Skin Absorption Factor (unitless)	Oral/Dermal Reference Dose (mg/kg-d)	Residential Scenario	
				Average Daily Intake (mg/kg-d)	Hazard Quotient (Unitless)
				Child	Child
Metals					
Antimony	290	0.01	4.0E-04	8.80E-05	2.20E-01
Barium	4900	0.01	2.0E-01	1.49E-03	7.43E-03
Beryllium	1.1	0.01	2.0E-04	3.34E-07	1.67E-03
Cadmium	180	0.001	1.0E-04	5.46E-06	5.46E-02
Chromium (VI)	1.7	0.01	9.0E-04	5.16E-07	5.73E-04
Cobalt	82	0.01	3.0E-04	2.49E-05	8.29E-02
Copper	6400	0.01	4.0E-02	1.94E-03	4.85E-02
Nickel	490	0.01	1.1E-02	1.49E-04	1.35E-02
Mercury	15	0.01	1.6E-04	4.55E-06	2.84E-02
Molybdenum	29	0.01	5.0E-03	8.80E-06	1.76E-03
Selenium	9.8	0.01	5.0E-03	2.97E-06	5.95E-04
Silver	21	0.01	5.0E-03	6.37E-06	1.27E-03
Thallium	16	0.01	1.0E-05	4.85E-06	4.85E-01
Vanadium	190	0.01	5.0E-03	5.76E-05	1.15E-02
Zinc	13000	0.01	3.0E-01	3.94E-03	1.31E-02
Pesticides					
4,4'-DDT	0.015	0.05	5.0E-04	2.28E-08	4.55E-05
4,4'-DDD	0.014	0.05	5.0E-04	2.12E-08	4.25E-05
Chlordane	0.3	0.05	5.0E-04	4.55E-07	9.10E-04
PCBs					
Aroclor-1248	0.14	0.15	NA	6.37E-07	NA
Aroclor-1260	0.098	0.15	NA	4.46E-07	NA
Aroclor-1268	0.071	0.15	NA	3.23E-07	NA
SVOCs					
1-Methylnaphthalene	0.39	0.15	7.0E-02	1.77E-06	2.54E-05
2-Methylnaphthalene	0.23	0.15	4.0E-03	1.05E-06	2.62E-04
Naphthalene	0.2	0.15	2.0E-02	9.10E-07	4.55E-05
Acenaphthylene	0.38	0.15	6.0E-02	1.73E-06	2.88E-05
Acenaphthene	0	0.15	6.0E-02	0.00E+00	0.00E+00
Fluorene	0.11	0.15	4.0E-02	5.01E-07	1.25E-05
Phenanthrene	0.61	0.15	4.0E-02	2.78E-06	6.94E-05
Anthracene	0.026	0.15	3.0E-01	1.18E-07	3.94E-07
Fluoranthene	1.1	0.15	4.0E-02	5.01E-06	1.25E-04
Pyrene	1.9	0.15	3.0E-02	8.65E-06	2.88E-04
Benzo(a)anthracene	0.57	0.15	NA	2.59E-06	NA
Chrysene	0.92	0.15	NA	4.19E-06	NA
Benzo(b)fluoroanthene	1.6	0.15	NA	7.28E-06	NA
Benzo(k)fluoroanthene	0.54	0.15	NA	2.46E-06	NA
Benzo(a)pyrene	1.7	0.15	3.0E-04	7.74E-06	2.58E-02
Indeno(1,2,3-cd)pyrene	1.1	0.15	NA	5.01E-06	NA
Dibenz(a,h)anthracene	0.21	0.15	NA	9.56E-07	NA
Dioxins					
Total Dioxins*	0.000147	0.03	7.0E-10	1.34E-10	1.91E-01
TPH					
TPH-g	1700	0.1	3.9E-02	5.16E-03	1.32E-01
TPH-d	3200	0.1	1.9E-02	9.71E-03	5.11E-01
TPH-mo	6000	0.1	1.5E-01	1.82E-02	1.21E-01
Total Hazard Index					**2.0E+00**

Notes:

NA = not applicable or not available

* = Toxicity data for 2,3,7,8-TCDD

Equations:

$$Child\ Intake_{Noncancer}\left(\frac{mg}{kg}day\right) = \frac{CS_{residential} \times SA_{child} \times AF_{child} \times ABS \times EF_{child} \times ED_{child} \times CF}{BW_{child} \times AT_{noncancer}}$$

$$Noncancer\ Hazard = \frac{Intake_{noncancer}}{RfD}$$

HHRA Appendix B, Table B-3
Health Hazards from Inhalation of Outdoor Air - Residential Exposure Scenario

COPC	Maximum Soil Concentration (mg/kg)	PEF or VEF (m^3/kg)	Inhalation Reference Concentration (ug/m^3)	Residential Scenario	
				Exposure Concentration (ug/m^3)	Hazard Quotient (Unitless)
				Child	Child
Metals					
Antimony	290	1.36E+09	3.0E-01	2.04E-04	6.82E-04
Barium	4900	1.36E+09	5.0E-01	3.45E-03	6.91E-03
Beryllium	1.1	1.36E+09	7.0E-03	7.76E-07	1.11E-04
Cadmium	180	1.36E+09	1.0E-02	1.27E-04	1.27E-02
Chromium (VI)	1.7	1.36E+09	3.0E-02	1.20E-06	4.00E-05
Cobalt	82	1.36E+09	6.0E-03	5.78E-05	9.64E-03
Copper	6400	1.36E+09	NA	4.51E-03	NA
Nickel	490	1.36E+09	1.4E-02	3.45E-04	2.47E-02
Mercury	15	1.36E+09	3.0E-02	1.06E-05	3.53E-04
Molybdenum	29	1.36E+09	2.0E+00	2.04E-05	1.02E-05
Selenium	9.8	1.36E+09	2.0E+01	6.91E-06	3.45E-07
Silver	21	1.36E+09	NA	1.48E-05	NA
Thallium	16	1.36E+09	NA	1.13E-05	NA
Vanadium	190	1.36E+09	1.0E-01	1.34E-04	1.34E-03
Zinc	13000	1.36E+09	NA	9.17E-03	NA
Pesticides					
4,4'-DDT	0.015	1.36E+09	NA	1.06E-08	NA
4,4'-DDD	0.014	1.36E+09	NA	9.87E-09	NA
Chlordane	0.3	1.36E+09	7.0E-01	2.12E-07	3.02E-07
PCBs					
Aroclor-1248	0.14	1.36E+09	NA	9.87E-08	NA
Aroclor-1260	0.098	1.36E+09	NA	6.91E-08	NA
Aroclor-1268	0.071	1.36E+09	NA	5.01E-08	NA
SVOCs					
1-Methylnaphthalene	0.39	1.36E+09	3.0E-03	2.75E-07	9.17E-05
2-Methylnaphthalene	0.23	1.36E+09	1.6E+01	1.62E-07	1.01E-08
Naphthalene	0.2	1.36E+09	3.0E+00	1.41E-07	4.70E-08
Acenaphthylene	0.38	1.36E+09	2.4E+02	2.68E-07	1.12E-09
Acenaphthene	0	1.36E+09	2.4E+02	0.00E+00	0.00E+00
Fluorene	0.11	1.36E+09	1.6E+02	7.76E-08	4.85E-10
Phenanthrene	0.61	1.36E+09	1.6E+02	4.30E-07	2.69E-09
Anthracene	0.026	1.36E+09	1.2E+03	1.83E-08	1.53E-11
Fluoranthene	1.1	1.36E+09	NA	7.76E-07	NA
Pyrene	1.9	1.36E+09	1.2E+02	1.34E-06	1.12E-08
Benzo(a)anthracene	0.57	1.36E+09	NA	4.02E-07	NA
Chrysene	0.92	1.36E+09	NA	6.49E-07	NA
Benzo(b)fluoroanthene	1.6	1.36E+09	NA	1.13E-06	NA
Benzo(k)fluoroanthene	0.54	1.36E+09	NA	3.81E-07	NA
Benzo(a)pyrene	1.7	1.36E+09	2.0E-03	1.20E-06	5.99E-04
Indeno(1,2,3-cd)pyrene	1.1	1.36E+09	NA	7.76E-07	NA
Dibenz(a,h)anthracene	0.21	1.36E+09	NA	1.48E-07	NA
Dioxins					
Total Dixoins*	0.000147	1.36E+09	4.0E-05	1.04E-10	2.59E-06
TPH					
TPH-g	1700	1.36E+09	6.2E+02	1.20E-03	1.93E-06
TPH-d	3200	1.36E+09	1.9E+02	2.26E-03	1.19E-05
TPH-mo	6000	1.36E+09	NA	4.23E-03	NA
Total Hazard Index					**5.7E-02**

Notes:

NA = not applicable or not available

* = Toxicity data for 2,3,7,8-TCDD

Equations:

Particulate: $Child\ Exposure_{Noncancer}(ug/m^3) = \frac{CS_{residential} \times \frac{1}{PEF} \times EF_{child} \times ED_{child} \times ET_{child}}{AT_{noncancer}}$

VOCs: $Child\ Exposure_{Noncancer}(ug/m^3) = \frac{CS_{residential} \times \frac{1}{VF} \times EF_{child} \times ED_{child} \times ET_{child}}{AT_{noncancer}}$

$Noncancer\ Hazard = \frac{Intake_{noncancer}}{RfD}$

HHRA Appendix B, Table B-4
Cumulative Health Hazards from Multipathway Soil Exposure - Residential Exposure Scenario

COPC	Maximum Soil Concentration (mg/kg)	Residential Noncancer Hazard			
		Child Resident			
		Ingestion of Soil	Dermal	Inhalation	Total HI
Metals					
Antimony	290	9.27E+00	2.20E-01	6.82E-04	9.5E+00
Barium	4900	3.13E-01	7.43E-03	6.91E-03	3.3E-01
Beryllium	1.1	7.03E-02	1.67E-03	1.11E-04	7.2E-02
Cadmium	180	2.30E+01	5.46E-02	1.27E-02	2.3E+01
Chromium (VI)	1.7	2.42E-02	5.73E-04	4.00E-05	2.5E-02
Cobalt	82	3.49E+00	8.29E-02	9.64E-03	3.6E+00
Copper	6400	2.05E+00	4.85E-02	NA	2.1E+00
Nickel	490	5.70E-01	1.35E-02	2.47E-02	6.1E-01
Mercury	15	1.20E+00	2.84E-02	3.53E-04	1.2E+00
Molybdenum	29	7.42E-02	1.76E-03	1.02E-05	7.6E-02
Selenium	9.8	2.51E-02	5.95E-04	3.45E-07	2.6E-02
Silver	21	5.37E-02	1.27E-03	NA	5.5E-02
Thallium	16	2.05E+01	4.85E-01	NA	2.1E+01
Vanadium	190	4.86E-01	1.15E-02	1.34E-03	5.0E-01
Zinc	13000	5.54E-01	1.31E-02	NA	5.7E-01
Pesticides					
4,4'-DDT	0.015	3.84E-04	4.55E-05	NA	4.3E-04
4,4'-DDD	0.014	3.58E-04	4.25E-05	NA	4.0E-04
Chlordane	0.3	7.67E-03	9.10E-04	3.02E-07	8.6E-03
PCBs					
Aroclor-1248	0.14	NA	NA	NA	--
Aroclor-1260	0.098	NA	NA	NA	--
Aroclor-1268	0.071	NA	NA	NA	--
SVOCs					
1-Methylnaphthalene	0.39	7.12E-05	2.54E-05	9.17E-05	1.9E-04
2-Methylnaphthalene	0.23	7.35E-04	2.62E-04	1.01E-08	1.0E-03
Naphthalene	0.2	1.28E-04	4.55E-05	4.70E-08	1.7E-04
Acenaphthylene	0.38	8.10E-05	2.88E-05	1.12E-09	1.1E-04
Acenaphthene	0	0.00E+00	0.00E+00	0.00E+00	--
Fluorene	0.11	3.52E-05	1.25E-05	4.85E-10	4.8E-05
Phenanthrene	0.61	1.95E-04	6.94E-05	2.69E-09	2.6E-04
Anthracene	0.026	1.11E-06	3.94E-07	1.53E-11	1.5E-06
Fluoranthene	1.1	3.52E-04	1.25E-04	NA	4.8E-04
Pyrene	1.9	8.10E-04	2.88E-04	1.12E-08	1.1E-03
Benzo(a)anthracene	0.57	NA	NA	NA	--
Chrysene	0.92	NA	NA	NA	--
Benzo(b)fluoroanthene	1.6	NA	NA	NA	--
Benzo(k)fluoroanthene	0.54	NA	NA	NA	--
Benzo(a)pyrene	1.7	7.25E-02	2.58E-02	5.99E-04	9.9E-02
Indeno(1,2,3-cd)pyrene	1.1	NA	NA	NA	--
Dibenz(a,h)anthracene	0.21	NA	NA	NA	--
Dioxins					
Total Dioxins*	0.000147	2.68E+00	1.91E-01	2.59E-06	2.9E+00
TPH					
TPH-g	1700	5.57E-01	1.32E-01	1.93E-06	6.9E-01
TPH-d	3200	2.15E+00	5.11E-01	1.19E-05	2.7E+00
TPH-mo	6000	5.11E-01	1.21E-01	NA	6.3E-01
Total Hazard Index					**7.0E+01**

Notes:

"--" not applicable or not available

* = Toxicity data for 2,3,7,8-TCDD

HHRA Appendix B, Table B-5

Cancer Risks from Incidental Soil Ingestion - Residential Exposure Scenario

COPC	Maximum Soil Concentration (mg/kg)	Oral Slope Factor $(mg/kg\text{-}d)^{-1}$	Residential Scenario	
			Average Daily Intake (mg/kg-d)	Cancer Risk (Unitless)
			Adult & Child	Adult & Child
Metals				
Antimony	290	NA	4.17E-04	NA
Barium	4900	NA	7.05E-03	NA
Beryllium	1.1	NA	1.58E-06	NA
Cadmium	180	NA	2.59E-04	NA
Chromium (VI)	1.7	5.0E-01	2.45E-06	1.22E-06
Cobalt	82	NA	1.18E-04	NA
Copper	6400	NA	9.21E-03	NA
Nickel	490	NA	7.05E-04	NA
Mercury	15	NA	2.16E-05	NA
Molybdenum	29	NA	4.17E-05	NA
Selenium	9.8	NA	1.41E-05	NA
Silver	21	NA	3.02E-05	NA
Thallium	16	NA	2.30E-05	NA
Vanadium	190	NA	2.73E-04	NA
Zinc	13000	NA	1.87E-02	NA
Pesticides				
4,4'-DDT	0.015	3.4E-01	2.16E-08	7.34E-09
4,4'-DDD	0.014	2.4E-01	2.01E-08	4.83E-09
Chlordane	0.3	3.5E-01	4.32E-07	1.51E-07
PCBs				
Aroclor-1248	0.14	2.0E+00	2.01E-07	4.03E-07
Aroclor-1260	0.098	2.0E+00	1.41E-07	2.82E-07
Aroclor-1268	0.071	2.0E+00	1.02E-07	2.04E-07
SVOCs				
1-Methylnaphthalene	0.39	5.1E-02	5.61E-07	2.86E-08
2-Methylnaphthalene	0.23	NA	3.31E-07	NA
Naphthalene	0.2	1.2E-01	2.88E-07	3.45E-08
Acenaphthylene	0.38	NA	5.47E-07	NA
Acenaphthene	0	NA	0.00E+00	NA
Fluorene	0.11	NA	1.58E-07	NA
Phenanthrene	0.61	NA	8.77E-07	NA
Anthracene	0.026	NA	3.74E-08	NA
Fluoranthene	1.1	NA	1.58E-06	NA
Pyrene	1.9	NA	2.73E-06	NA
Benzo(a)anthracene	0.57	1.0E-01	8.20E-07	8.20E-08
Chrysene	0.92	1.0E-03	1.32E-06	1.32E-09
Benzo(b)fluoroanthene	1.6	1.0E-01	2.30E-06	2.30E-07
Benzo(k)fluoroanthene	0.54	1.0E-02	7.77E-07	7.77E-09
Benzo(a)pyrene	1.7	1.0E+00	2.45E-06	2.45E-06
Indeno(1,2,3-cd)pyrene	1.1	1.0E-01	1.58E-06	1.58E-07
Dibenz(a,h)anthracene	0.21	4.1E+00	3.02E-07	1.24E-06
Dioxins				
Total Dioxins*	0.000147	1.3E+05	2.11E-10	2.75E-05
TPH				
TPH-g	1700	NA	2.45E-03	NA
TPH-d	3200	NA	4.60E-03	NA
TPH-mo	6000	NA	8.63E-03	NA
Total Cancer Risk				**3.4E-05**

Notes:

NA = not applicable or not available

* = Toxicity data for 2,3,7,8-TCDD

Equations:

$$Adult/Child\ Intake_{cancer}\left(\frac{mg}{kg}day\right) = \frac{CS_{residential} \times ING_{adjusted} \times EF\ \times CF}{AT_{cancer}}$$

$$Where\ ING_{adjusted} = \left(\frac{IR{\sim}S_{child} \times ED_{child}}{BW_{child}}\right) + \left(\frac{IR{\sim}S_{adult} \times ED_{adult}}{BW_{adult}}\right.$$

$$Cancer\ Risk = Intake_{cancer} \times CSF$$

HHRA Appendix B, Table B-6
Cancer Risks from Dermal Contact with Soil - Residential Exposure Scenario

COPC	Maximum Soil Concentration (mg/kg)	Soil-to-Skin Absorption Factor (unitless)	Oral/Dermal Slope Factor $(mg/kg\text{-}d)^{-1}$	Residential Scenario	
				Average Daily Intake (mg/kg-d)	Cancer Risk (Unitless)
				Adult & Child	Adult & Child
Metals					
Antimony	290	0.01	NA	1.17E-05	NA
Barium	4900	0.01	NA	1.98E-04	NA
Beryllium	1.1	0.01	NA	4.45E-08	NA
Cadmium	180	0.001	NA	7.28E-07	NA
Chromium (VI)	1.7	0.01	5.0E-01	6.88E-08	3.44E-08
Cobalt	82	0.01	NA	3.32E-06	NA
Copper	6400	0.01	NA	2.59E-04	NA
Nickel	490	0.01	NA	1.98E-05	NA
Mercury	15	0.01	NA	6.07E-07	NA
Molybdenum	29	0.01	NA	1.17E-06	NA
Selenium	9.8	0.01	NA	3.97E-07	NA
Silver	21	0.01	NA	8.50E-07	NA
Thallium	16	0.01	NA	6.47E-07	NA
Vanadium	190	0.01	NA	7.69E-06	NA
Zinc	13000	0.01	NA	5.26E-04	NA
Pesticides					
4,4'-DDT	0.015	0.05	3.4E-01	3.03E-09	1.03E-09
4,4'-DDD	0.014	0.05	2.4E-01	2.83E-09	6.80E-10
Chlordane	0.3	0.05	3.5E-01	6.07E-08	2.12E-08
PCBs					
Aroclor-1248	0.14	0.15	2.0E+00	8.50E-08	1.70E-07
Aroclor-1260	0.098	0.15	2.0E+00	5.95E-08	1.19E-07
Aroclor-1268	0.071	0.15	2.0E+00	4.31E-08	8.62E-08
SVOCs					
1-Methylnaphthalene	0.39	0.15	5.1E-02	2.37E-07	1.21E-08
2-Methylnaphthalene	0.23	0.15	NA	1.40E-07	NA
Naphthalene	0.2	0.15	1.2E-01	1.21E-07	1.46E-08
Acenaphthylene	0.38	0.15	NA	2.31E-07	NA
Acenaphthene	0	0.15	NA	0.00E+00	NA
Fluorene	0.11	0.15	NA	6.68E-08	NA
Phenanthrene	0.61	0.15	NA	3.70E-07	NA
Anthracene	0.026	0.15	NA	1.58E-08	NA
Fluoranthene	1.1	0.15	NA	6.68E-07	NA
Pyrene	1.9	0.15	NA	1.15E-06	NA
Benzo(a)anthracene	0.57	0.15	1.0E-01	3.46E-07	3.46E-08
Chrysene	0.92	0.15	1.0E-03	5.58E-07	5.58E-10
Benzo(b)fluoroanthene	1.6	0.15	1.0E-01	9.71E-07	9.71E-08
Benzo(k)fluoroanthene	0.54	0.15	1.0E-02	3.28E-07	3.28E-09
Benzo(a)pyrene	1.7	0.15	1.0E+00	1.03E-06	1.03E-06
Indeno(1,2,3-cd)pyrene	1.1	0.15	1.0E-01	6.68E-07	6.68E-08
Dibenz(a,h)anthracene	0.21	0.15	4.1E+00	1.27E-07	5.23E-07
Dioxins					
Total Dioxins*	0.000147	0.03	1.3E+05	1.78E-11	2.32E-06
TPH					
TPH-g	1700	0.1	NA	6.88E-04	NA
TPH-d	3200	0.1	NA	1.29E-03	NA
TPH-mo	6000	0.1	NA	2.43E-03	NA
Total Cancer Risk					**4.5E-06**

Notes:

NA = not applicable or not available

* = Toxicity data for 2,3,7,8-TCDD

Equations:

$$Adult/Child\ Intake_{cancer}\left(\frac{mg}{kg}day\right) = \frac{CS_{residential} \times SAF_{adjusted} \times ABS \times CF}{AT_{cancer}}$$

$$Where\ SAF_{adjusted} = \left(\frac{SA_{child} \times AF_{child} \times EF_{child} \times ED_{child}}{BW_{child}}\right) + \left(\frac{SA_{adult} \times AF_{adult} \times EF_{adult} \times ED_{adult}}{BW_{adult}}\right)$$

$$Cancer\ Risk = Intake_{cancer} \times CSF$$

HHRA Appendix B, Table B-7
Cancer Risks from Inhalation of Outdoor Air - Residential Exposure Scenario

COPC	Maximum Soil Concentration (mg/kg)	PEF or VEF (m^3/kg)	Inhalation Unit Risk $(ug/m^3)^{-1}$	Residential Scenario	
				Exposure Concentration (ug/m^3)	Cancer Risk (Unitless)
				Adult & Child	Adult & Child
Metals					
Antimony	290	1.36E+09	NA	7.59E-05	NA
Barium	4900	1.36E+09	NA	1.28E-03	NA
Beryllium	1.1	1.36E+09	2.4E-03	2.88E-07	6.91E-10
Cadmium	180	1.36E+09	4.2E-03	4.71E-05	1.98E-07
Chromium (VI)	1.7	1.36E+09	1.5E-01	4.45E-07	6.68E-08
Cobalt	82	1.36E+09	9.0E-03	2.15E-05	1.93E-07
Copper	6400	1.36E+09	NA	1.68E-03	NA
Nickel	490	1.36E+09	2.6E-04	1.28E-04	3.34E-08
Mercury	15	1.36E+09	NA	3.93E-06	NA
Molybdenum	29	1.36E+09	NA	7.59E-06	NA
Selenium	9.8	1.36E+09	NA	2.57E-06	NA
Silver	21	1.36E+09	NA	5.50E-06	NA
Thallium	16	1.36E+09	NA	4.19E-06	NA
Vanadium	190	1.36E+09	NA	4.98E-05	NA
Zinc	13000	1.36E+09	NA	3.40E-03	NA
Pesticides					
4,4'-DDT	0.015	1.36E+09	9.7E-05	3.93E-09	3.81E-13
4,4'-DDD	0.014	1.36E+09	6.9E-05	3.67E-09	2.53E-13
Chlordane	0.3	1.36E+09	1.0E-04	7.86E-08	7.86E-12
PCBs					
Aroclor-1248	0.14	1.36E+09	5.7E-04	3.67E-08	2.09E-11
Aroclor-1260	0.098	1.36E+09	5.7E-04	2.57E-08	1.46E-11
Aroclor-1268	0.071	1.36E+09	5.7E-04	1.86E-08	1.06E-11
SVOCs					
1-Methylnaphthalene	0.39	1.36E+09	1.3E-05	1.02E-07	1.31E-12
2-Methylnaphthalene	0.23	1.36E+09	NA	6.02E-08	NA
Naphthalene	0.2	1.36E+09	3.4E-05	5.24E-08	1.78E-12
Acenaphthylene	0.38	1.36E+09	NA	9.95E-08	NA
Acenaphthene	0	1.36E+09	NA	0.00E+00	NA
Fluorene	0.11	1.36E+09	NA	2.88E-08	NA
Phenanthrene	0.61	1.36E+09	NA	1.60E-07	NA
Anthracene	0.026	1.36E+09	NA	6.81E-09	NA
Fluoranthene	1.1	1.36E+09	NA	2.88E-07	NA
Pyrene	1.9	1.36E+09	NA	4.98E-07	NA
Benzo(a)anthracene	0.57	1.36E+09	1.1E-04	1.49E-07	1.64E-11
Chrysene	0.92	1.36E+09	1.1E-05	2.41E-07	2.65E-12
Benzo(b)fluoroanthene	1.6	1.36E+09	1.1E-04	4.19E-07	4.61E-11
Benzo(k)fluoroanthene	0.54	1.36E+09	1.1E-04	1.41E-07	1.56E-11
Benzo(a)pyrene	1.7	1.36E+09	1.1E-03	4.45E-07	4.90E-10
Indeno(1,2,3-cd)pyrene	1.1	1.36E+09	1.1E-04	2.88E-07	3.17E-11
Dibenz(a,h)anthracene	0.21	1.36E+09	1.2E-03	5.50E-08	6.60E-11
Dioxins					
Total Dioxins*	0.000147	1.36E+09	3.8E+01	3.85E-11	1.46E-09
TPH					
TPH-g	1700	1.36E+09	NA	4.45E-04	NA
TPH-d	3200	1.36E+09	NA	8.38E-04	NA
TPH-mo	6000	1.36E+09	NA	1.57E-03	NA
Total Cancer Risk					**4.9E-07**

Notes:

NA = not applicable or not available

* = Toxicity data for 2,3,7,8-TCDD

Equations:

$$Particulate\ Exposure\ Concentration\ (\frac{ug}{m^3}) = (\frac{CS \times EF_{child} \times ED_{child} \times ET_{child}}{PEF \times AT_c}) + (\frac{CS \times EF_{adult} \times ED_{adult} \times ET_{adult}}{PEF \times AT_c}$$

$$VOC\ Exposure\ Concentration\ (\frac{ug}{m^3}) = \frac{CS \times EF \times ED \times ET}{VF \times AT_c}$$

$$Cancer\ Risk = Intake_{cancer} \times CSF$$

HHRA Appendix B, Table B-8

Cumulative Cancer Risks from Multipathway Soil Exposure - Residential Exposure Scenario

COPC	Maximum Soil Concentration (mg/kg)	Residential Cancer Risk			
		Adult & Child Resident			
		Ingestion	Dermal	Inhalation	Total Risk
Metals					
Antimony	290	NA	NA	NA	--
Barium	4900	NA	NA	NA	--
Beryllium	1.1	NA	NA	6.9E-10	6.9E-10
Cadmium	180	NA	NA	2.0E-07	2.0E-07
Chromium (VI)	1.7	1.2E-06	3.4E-08	6.7E-08	1.3E-06
Cobalt	82	NA	NA	1.9E-07	1.9E-07
Copper	6400	NA	NA	NA	--
Nickel	490	NA	NA	3.3E-08	3.3E-08
Mercury	15	NA	NA	NA	--
Molybdenum	29	NA	NA	NA	--
Selenium	9.8	NA	NA	NA	--
Silver	21	NA	NA	NA	--
Thallium	16	NA	NA	NA	--
Vanadium	190	NA	NA	NA	--
Zinc	13000	NA	NA	NA	--
Pesticides					
4,4'-DDT	0.015	7.3E-09	1.0E-09	3.8E-13	8.4E-09
4,4'-DDD	0.014	4.8E-09	6.8E-10	2.5E-13	5.5E-09
Chlordane	0.3	1.5E-07	2.1E-08	7.9E-12	1.7E-07
PCBs					
Aroclor-1248	0.14	4.0E-07	1.7E-07	2.1E-11	5.7E-07
Aroclor-1260	0.098	2.8E-07	1.2E-07	1.5E-11	4.0E-07
Aroclor-1268	0.071	2.0E-07	8.6E-08	1.1E-11	2.9E-07
SVOCs					
1-Methylnaphthalene	0.39	2.9E-08	1.2E-08	1.3E-12	4.1E-08
2-Methylnaphthalene	0.23	NA	NA	NA	--
Naphthalene	0.2	3.5E-08	1.5E-08	1.8E-12	4.9E-08
Acenaphthylene	0.38	NA	NA	NA	--
Acenaphthene	0	NA	NA	NA	--
Fluorene	0.11	NA	NA	NA	--
Phenanthrene	0.61	NA	NA	NA	--
Anthracene	0.026	NA	NA	NA	--
Fluoranthene	1.1	NA	NA	NA	--
Pyrene	1.9	NA	NA	NA	--
Benzo(a)anthracene	0.57	8.2E-08	3.5E-08	1.6E-11	1.2E-07
Chrysene	0.92	1.3E-09	5.6E-10	2.7E-12	1.9E-09
Benzo(b)fluoroanthene	1.6	2.3E-07	9.7E-08	4.6E-11	3.3E-07
Benzo(k)fluoroanthene	0.54	7.8E-09	3.3E-09	1.6E-11	1.1E-08
Benzo(a)pyrene	1.7	2.4E-06	1.0E-06	4.9E-10	3.5E-06
Indeno(1,2,3-cd)pyrene	1.1	1.6E-07	6.7E-08	3.2E-11	2.3E-07
Dibenz(a,h)anthracene	0.21	1.2E-06	5.2E-07	6.6E-11	1.8E-06
Dioxins					
Total Dioxins*	0.000147	2.7E-05	2.3E-06	1.5E-09	3.0E-05
TPH					
TPH-g	1700	NA	NA	NA	--
TPH-d	3200	NA	NA	NA	--
TPH-mo	6000	NA	NA	NA	--
Total Cancer Risk					**3.9E-05**

Notes:

"--" not applicable or not available

* = Toxicity data for 2,3,7,8-TCDD

APPENDIX F. MILL VALLEY MIDDLE SCHOOL MODERNIZATION MESS COMMENT LETTER SUPPORTING DOCUMENTS

MVMS Modernization Mess
an association of concerned parents
mvmsmodernizationmess.com | mvmsmodernizationmess@gmail.com

Public Comment on the Mill Valley Middle School Environmental Impact Report

October 9, 2025

VIA EMAIL

To:

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ekaufman@mvschools.org
Julio Arroyo, Director of Maintenance and Operations
jarroyo@mvschools.org
Mill Valley School District
411 Sycamore Avenue
Mill Valley, CA 9494

Cc:

- John A. Carroll, Marin County Superintendent of Schools, superintendentsoffice@marinschools.org
- Citizen's Bond Oversight Committee, cboc@mvschools.org
- Lee Bryant, Greg Pirie, and Tara Efrain, County Environmental Health Services, lbryant@marincounty.org; gpirie@marincounty.org; tefrain@marincounty.org
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- Larry Goldzband, San Francisco Bay Commission and Development Commission, larry.goldzband@bcdc.ca.gov
- Keith Robertson and Alan Friedman, SF Bay Regional Water Quality Control Board, keith.robertson@waterboards.ca.gov; alan.friedman@waterboards.ca.gov
- PTA Council, ptacouncil@mvschools.org
- Community Financial Advisory Committee (CFAC), cfac@mvschools.org
- Jessica Newman, Executive Director, Kiddo, jnewman@kiddo.org

MVMS Modernization Mess
an association of concerned parents
mvmsmodernizationmess.com | mvmsmodernizationmess@gmail.com

Dear Dr. Kaufman and Mr. Arroyo:

I. Executive Summary

This letter provides detailed comments regarding the Draft Environmental Impact Report ("Draft EIR") for the Mill Valley Middle School ("MVMS") Modernization Project. The community remains deeply concerned about the project's environmental, fiscal, and safety implications. In summary:

- The original, now discarded, rebuild project analyzed in the Draft EIR is no longer financially feasible because of well-documented issues with soil toxicity at the site. Instead of conducting an initial feasibility analysis for a few hundred thousand dollars, the District spent more than 3 years and approximately $6 million dollars planning for a project that was not realistic considering expected mitigation needs.
- The Draft EIR fails to provide an accurate project description or meaningful analysis of the renovation option now under consideration with only three-and-a-half pages of analysis, one of which is a picture.
- Proceeding before completion of the Preliminary Endangerment Analysis ("PEA") process violates CEQA requirements and frustrates informed public review.
- The EIR improperly rejects and never seriously studies feasible alternatives, such as relocating MVMS to the Edna Maguire site, based on outdated student enrollment data. There are 377 Edna students that could be redistributed to the four existing elementary schools. The traffic at Edna was originally studied, and approved, for 679 students. MVMS currently has 697 students, so that is comparable and feasible. This is worth exploring because the Edna site would be (1) **safer**: free from the liquefaction zone, flooding, contamination, and smell, (2) **less disruptive**: no students would have to move mid-year or learn amid construction noise, and (3) **more sustainable**: no sea level rise "island" effect and no concern about the waning useful life of a 1970s building.
- The District is proposing to spend $130 million, or $1,406 per square foot, for a remodel with a limited useful life by not addressing known flooding and seismic issues, since $38 million – or 29% of the budget! – is being dedicated to toxic soil removal ($19.2 million) and temporary housing ($18.7 million), all of which could be expended on more durable enhancements at the Edna site, making that option far **more cost-effective.**
- The District's timeline is unrealistic and risks fiscal mismanagement.

We respectfully urge the District to withdraw and revise the Draft EIR to ensure compliance with CEQA, promote transparency in project planning, and secure the long-term safety and sustainability of Mill Valley schools.

II. Introduction

The Draft EIR fails to address community concerns related to the environmental, financial, and safety implications of the MVMS modernization project. It also fails to meet the basic requirements of the California Environmental Quality Act ("CEQA"), Pub. Res. Code § 21000 et seq.

As discussed in detail below, the Mill Valley School District has acknowledged that the "proposed project" analyzed in the Draft EIR – a complete rebuild of the MVMS campus – is no longer financially feasible. It is confusing, even within this letter, to discuss the EIR's "proposed project" because that is now a discarded project that is no longer proposed at all. To ensure this letter is not as confusing as the EIR, we will refer to that erstwhile rebuild project as the "Discarded Rebuild Project."

The District must now, of necessity, turn to the alternatives identified in the EIR. However, the District cannot lawfully pursue the alternative it appears to favor – a renovation of the current building – on the basis of this Draft EIR. The Draft EIR is fundamentally misleading because it does not clearly identify or adequately analyze the version of the project the District apparently wants to build. The EIR is also inadequate because the District is rushing to approve the project before it has sufficient information about the health and safety risks associated with the existing site and the scope and cost of the mitigation necessary to reduce those risks. Thus, the District's currently favored renovation alternative, like the Discarded Rebuild Project misleadingly analyzed in the Draft EIR, may well turn out to be environmentally and financially infeasible. Unfortunately, the District may not even know that until after it has approved the project.

This rush to approval, before critical information is available, violates CEQA. It is also both fiscally and environmentally irresponsible. The District needs to consider all of the relevant facts and seriously look at alternatives that will not risk the health and safety of students and staff or the District's own fiscal viability. Once it has done so, the District must revise and recirculate the Draft EIR so that the community can understand and provide meaningful input on the environmental and financial impacts of the project that the District is actually proposing to approve and build.

III. Infeasibility of the Discarded Rebuild Project

The District has acknowledged that the Discarded Rebuild Project is no longer financially feasible. At the August 14, 2025 School Board meeting, the District presented the following budget trajectory, which we are attaching as Exhibit A:[1]

- **Sept. 2023:** Board set a $130 million target budget.
- **Sept. 2024:** Cost estimate increased by $22.6 million when pier foundations were replaced with deep soil mixing to address lateral spread and liquefaction.
- **Sept. 2024:** "Value engineering" reduced project size to $134 million.
- **June 2025:** Additional $23 million in projected toxic soil removal costs identified.
- **July 2025:** Budget ballooned to $156 million and project declared infeasible.
- **Aug. 2025:** District began considering alternatives with a target budget for hard costs of $95 million and an estimated $130 million [2] including soft costs and contingency (including $19.2 million for soil removal[3] and $18.7 million for temporary housing[4]).

In total, toxic soil removal and geotechnical mitigation with the rebuild was projected at $32.4 million, nearly one-quarter of the entire budget and far above the $7.8 million originally set aside.[5] We repeatedly cautioned the District that costs would approach $33 million based on comparable San Diego projects. Our warnings proved accurate, but went unheeded.

The Discarded Rebuild Project collapsed because the District rushed ahead without methodically considering the threshold issues that would make or break that plan. The District knew that the soil was toxic before the Measure G Bonds were even passed and that soil *mixing* would be required as early as 2024, so why did it not ask the Department of Toxic Substances Control ("DTSC") or even its own consultants earlier, first thing even, if soil *removal* might also be

[1] Mill Valley School District, School Board meeting deck, August 14, 2025, *available at* https://www.mvschools.org/89534_3 [as of Oct. 9, 2025]. The District is now only posting very abbreviated School Board meeting "highlights", along with full-length meeting videos, which require a viewer to wade through hours of footage, making it difficult to access this public information. To facilitate review, we are thus attaching the August 14, 2025 Board deck to this letter as Exhibit A. We downloaded this before the District revamped its website making the information harder to locate.
[2] *Id.* at p. 4.
[3] *Id.* at p. 5.
[4] *Id.* at p. 9.
[5] Measure G Board of Trustees Meeting, AECOM presentation deck, January 11, 2024, p. 32, *available at* https://static1.squarespace.com/static/668c4a0dd9348c745c994ccf/t/67106852d096722216bbc134/1729128536194/Measure+G+January.pdf [as of Oct. 9, 2025].

required? That shoe finally dropped in the Summer of 2025. In a report titled, "Mill Valley Middle School Reconstruction Hazardous Soil Volumetric Analysis" prepared by Flint on June 6, 2025, attached hereto as Exhibit B, the District's consultants explained that soil removal would indeed be required, defining a term called the *3' Clean Cap Requirement*, which is "a minimum 3-foot vertical buffer of clean soil between finished grade and any underlying contaminated material…***consistent with standard* DTSC mitigation guidance for school sites**" (emphasis added). If this is a known DTSC standard, it is baffling that it took so long to prepare this report, which finally "quantifies the anticipated scope, cost, and environmental compliance implications of hazardous soil removal at Mill Valley Middle School," something we had been requesting for over a year. The report explains that the new analysis was "initiated in response to updated PEA findings" (page 9).

While questions about soil removal lingered, the District could have held off on the detailed architectural drawings, the tense community meetings, and even the EIR until it had an answer to that essential question. Breezing past this crucial threshold issue had serious financial implications. As of March 2025, the District has spent approximately $6,014,866.80 on the Discarded Rebuild Project, comprised of $2,902,181.00 for MVMS site planning (including $1,944,489.88 on architect fees),[6] plus another $325,000.00 on architect fees for the interim campus,[7] plus $2,787,685.80 for AECOM's construction management services,[8] some of which is allocable to the elementary sites, but most of which is allocable to MVMS.

Unfortunately, the District proceeded before it had all the relevant information. Chaos and confusion resulted, and it is about to repeat this same mistake. Given that the District has already had to make a major project shift due to new PEA findings, it would certainly be wise to actually finish the PEA process before rushing to approve the next alternative.

IV. The Draft EIR's Inaccurate Project Description Renders the Entire Document Fundamentally Misleading and Inadequate.

An EIR must contain an accurate, stable, and finite project description.[9] Such a project description "is the sine qua non of an informative and legally sufficient EIR."[10] A project description that gives "conflicting signals to decisionmakers and the public about the nature and

[6] Citizens Bond Oversight Committee Meeting, Fiscal Year 2024-25 Financial Update, "Expenditure by Category and PO March 2025 (1)," April 23, 2025, *available at* https://simbli.eboardsolutions.com/SB_Meetings/ViewMeeting.aspx?S=36030331&MID=38805&Tab=Agenda&enIID=FG86plusHyU72fPNlrrCkGUXw%3D%3D, p. 2 [as of Oct. 9, 2025].
[7] *Id.*
[8] *Id.* at p. 5.
[9] *County of Inyo v. City of Los Angeles (1977)*, 71 Cal. App. 3d 185, 199.
[10] *Id.* at p. 193.

scope of the activity being proposed . . . [is] fundamentally inadequate and misleading."[11] In other words, "A curtailed, enigmatic or unstable project description draws a red herring across the path of public input."[12]

Unable to advance the Discarded Rebuild Project, the District has now shifted focus to two alternatives: (1) renovation of the existing MVMS campus, including upgrades and a new STEM building, as described in the EIR (the "Renovation Option"); and (2) construction of a new middle school at 70 Lomita Avenue (the former Terra Marin site), co-located with Edna Maguire Elementary (the "Dual-Schools Option"). The Draft EIR devotes hundreds of pages to the Discarded Rebuild Project, while allocating only a few cursory pages to the alternatives now under consideration. The Renovation Option that the District wants to approve, based on the analysis in this EIR, is discussed over the course of a mere three-and-a-half pages, one of which is a full-page picture that hardly counts. That is patently absurd and wholly inadequate given the scale and complexity of this project. Moreover, the District is, once again, rushing ahead before answering the next set of crucial threshold questions.

In the *Washoe Meadows* case, the Court of Appeal found that an EIR that discussed a range of alternatives – each of which had distinct impacts and would require different mitigation measures – without clearly identifying and analyzing a single proposed project is inherently misleading and unstable.[13] Here, the District has already rejected the proposed project identified in the Draft EIR. What remains of the Draft EIR therefore suffers from the same flaw as the EIR in *Washoe Meadows*. Absent a clearly identified proposed project, the EIR effectively examines only a range of inadequately defined alternatives. The EIR thus does not provide sufficient analysis of environmental impacts, mitigation measures, or feasibility to support informed decision-making and public review regarding *any* of the remaining alternatives, each of which is described in only a few cursory pages. If anything, this Draft EIR's project description is even more misleading than the description in *Washoe Meadows* because it fails to disclose that the proposed project it *does* identify is no longer the project the District proposes to build.

The District cannot rely on the Draft EIR to approve the Renovation Option because it is not described in sufficient detail or with sufficient certainty to meet CEQA's standards. The exact contours of the Renovation Option remain ill-defined and seem to be continuously shifting. For instance, we recently learned at a community meeting that the proposed STEM building has now been abandoned due to the same soil mitigation issues that doomed the Discarded Rebuild Project.

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[11] *San Joaquin Raptor Rescue Center v. County of Merced* (2007) 149 Cal.App.4th 645, 655–656
[12] *County of Inyo*, *supra*, 71 Cal.App.3d at p. 198.
[13] *Washoe Meadows Community v. Dept. of Parks and Recreation* (2017) 17 Cal.App.5th 277, 288-289.

In the three-and-a-half pages about the Renovation Option, the EIR does not say what will happen to the current building's foundation, whether any upgrades are advisable, required, or financially feasible. The EIR goes on at some length about the severe seismic liquefaction risk at the site,[14] but it then punts on the implications for the Renovation Option. The EIR says only, "This alternative would renovate the existing building *and possibly the foundations* to meet current building code seismic requirements."[15] We have heard conflicting things at subsequent community meetings. At one, the Superintendent said the 1970s foundation would be left as-is, meaning the project would not meet current building code seismic requirements at all. At another, she said that of course seismic safety would be taken seriously, but she stopped short of saying what that would actually involve or how much it would cost. The District's FAQs, posted on its website after the release of the Draft EIR, say that "Ultimately, California Geological Services and the Department of the State Architect will decide whether deep soil mixing is required [for seismic stabilization], using the best available science and applicable regulations to ensure the safety of students and staff."[16] Those agencies have not yet reviewed the renovation plan, so the District does not know what those agencies might require. Seismic safety is an important planning consideration for a school, both for safety and fiscal feasibility, and the public deserves to know the plan, or the extent to which there is actually no seismic strengthening plan at all, as the case may be.

Similarly, the three-and-a-half pages about the Renovation Option also fail to describe whether and to what extent the Renovation Option would disrupt the soil cap that currently protects students and staff from the hazardous contaminants in the burn dump underlying the current site. The EIR does not say what the implications would be for the anticipated level of disruption. The EIR offers only vague, conclusory assertions, such as, "This alternative would involve some construction within the former landfill underlying portions of the existing school, although less disturbance would occur than under the Proposed Project. The interim campus would be exposed to some potential dust and emissions hazards, but these would be reduced compared with the proposed Project due to the substantial reduction in earth disturbing activities."[17] The qualitative description "some" is not sufficiently precise to inform parents or the District itself of the extent of possible hazards under this option, particularly for students and staff at the proposed temporary campus next door. What soil cap disruption would be necessary? Would the new

[14] The EIR describes the severity of the seismic hazards: "Results of the geotechnical investigation performed by Ninyo & Moore in 2024 indicate that settlement under new loads is a consideration due to the undocumented fill and soft bay mud encountered at the Site. Portions of the Site are susceptible to liquefaction, lateral spreading, and settlement under new loads." (EIR, p. 52 [PDF pagination]).
[15] *Id.* at p. 266 [PDF pagination].
[16] District FAQs, *available at* https://files.smartsites.parentsquare.com/5178/mvms_faqs_9262025.pdf [as of Oct. 9, 2025].
[17] EIR p. 267 [PDF pagination].

shade structures require soil cap disruption? Simply stating that the Renovation Option's impacts might be "reduced" in comparison to those of a project the District now has no intention of pursuing does not adequately inform the public or the District as to what the actual project's impacts might be. Indeed, it appears the District does not even know, because the characteristics of the Renovation Option itself keep shifting.

V. The Draft EIR Fails to Disclose, and Propose Adequate Mitigation for, Hazards Related to the Existing School Site

The Draft EIR's analysis of and proposed mitigation for hazards associated with the current site are inadequate because the District is rushing the process before it has the information necessary to comply with CEQA and make informed environmental and financial decisions.

The EIR is quite unusually proceeding *before* DTSC has completed its independent environmental analysis, as part of the required 3-Step Preliminary Endangerment Analysis ("PEA") process.[18] The District is only on Step 2 of that process. In Step 1, it stipulated that the current site contains contaminants, so it moved to Step 2, which is to complete soil and soil vapor testing, which will then be documented in the final PEA. The sampling is still underway, and the PEA is still in draft form. The EIR projects confidence about soil results and mitigation, but it misses the mark by citing an earlier version of the PEA, which does not reflect the results of subsequent sampling or an updated risk assessment based on that new data, as that entire process is still underway. Since the PEA is not yet final, the District has not even begun Step 3, which is to develop a Removal Action Work Plan or Remedial Action Plan, the details and costs of which are as-yet wholly unknowable.

Rather than wait until it has sufficient information to disclose and formulate mitigation for these impacts, the District is punting the entire analysis and mitigation process until *after* approval of the project. This is unlawful. An EIR is inadequate as an informational document if its suggested mitigation measures fail to meet CEQA standards or are so undefined that it is impossible to evaluate their effectiveness.[19] The District may not use the inadequacy of its impacts review to avoid mitigation: "The agency should not be allowed to hide behind its own failure to collect data."[20] Moreover, "[m]itigation measures must be fully enforceable through permit conditions, agreements, or legally binding instruments."[21] The formulation of mitigation measures may not be improperly deferred until after Project approval absent specific performance standards and

[18] DTSC, Site Mitigation & Restoration Program: 3-Step Process", *available at* https://dtsc.ca.gov/3-step-process/ [as of Oct. 9, 2025].
[19] *See King and Gardiner Farms, LLC v. County of Kern* (2020) 45 Cal.App.5th 814, 866; *San Franciscans for Reasonable Growth v. City and County of San Francisco* (1984) 151 Cal.App.3d 61, 79.
[20] *Sundstrom v. County of Mendocino* (1988) 202 Cal.App.3d 296, 306.
[21] CEQA Guidelines § 15126.4(a)(2).

concrete commitments to defined mitigation actions.[22] A conclusion that mitigation will reduce impacts to a less-than-significant level must be supported by substantial evidence.[23]

Here, the District proposes to select and approve its favored alternative *before* the PEA and accompanying Mitigation Plan are finalized. A proposed schedule on the District's website states that the Final EIR will be certified and the project approved in December 2025. The District also anticipates a "Final PEA" in December 2025. But the Final Mitigation Plan for whatever project the District intends to pursue will not be ready until April 2026.[24]

This schedule is both unrealistic and inadequate. As discussed above, the District has released only a draft PEA, and DTSC is requiring additional soil vapor samples, as shown in the correspondence between the District and DTSC, attached hereto as Exhibit C.[25] The EIR incorporates soil measurements from a prior version of the PEA, so it does not reflect the current data or health hazard information. In addition, the Health Risk Assessment attached as Appendix E to the Draft EIR has not yet been updated to include the most recent soil sampling results and has not yet been approved by DTSC.[26] The Health Risk Assessment included with the Draft EIR for public comment is therefore already out of date and insufficient to inform either the community or the District as to the project's real risks to students, teachers, and families.[27] Moreover, the DTSC-supervised Phase 3 Removal Action Work Plan or Remedial Action Plan

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[22] *See King and Gardiner Farms*, *supra*, 45 Cal.App.5th at 857-60.
[23] *See id.* at 878-79.
[24] "Modernization Project Schedule," *available at* https://www.mvschools.org/facilities-modernization [as of Oct. 9, 2025].
[25] The District's consultant, Ninyo & Moore, submitted a Draft PEA Report to DTSC on April 8, 2025. On July 3, 2025, DTSC provided extensive – and highly critical – comments on the Draft PEA identifying significant problems with both sample collection and the overall health risk assessment in the Draft PEA Report. DTSC, Letter to Mr. Julio Arroyo, Mill Valley School District, Re: DTSC Review of Draft Preliminary Endangerment Assessment Report (July 3, 2025). Among other things, DTSC's letter identified concentrations of multiple toxic materials above significance thresholds and methane gas at "explosive" levels on the site. DTSC recommended additional soil gas sampling. Ninyo & Moore provided an "Addendum 2" to the Draft PEA Work Plan on August 22, 2025, outlining additional soil gas and indoor air sampling. On September 9, 2025, DTSC provided additional comments, identifying additional deficiencies in Ninyo & Moore's revised approach. DTSC, Letter to Mr. Julio Arroyo, Mill Valley School District, Re: DTSC Comments – Preliminary Endangerment Assessment Work Plan, Revision 2, Addendum 2 (Sept. 9, 2025). However, Ninyo & Moore apparently proceeded with additional sample collection on August 30 and 31, 2025, before receiving DTSC's comments. Letter from Ninyo & Moore to DTSC, Re: Response to Department of Toxic Substance Control's September 9, 2025 Comment Letter on Preliminary Endangerment Assessment Work Plan, Revision 2 Addendum 2 (Sept. 23, 2025). Copies of this correspondence are attached as Exhibit C.
[26] Ninyo & Moore, letter to DTSC, Sept. 23, 2025, at pp. 2-3 (describing Ninyo & Moore's proposal to revise the Draft PEA Report to include additional soil sampling and an "updated" Health Risk Assessment "and submit to the DTSC for review.").
[27] Perhaps the District is intending to include an updated Health Risk Assessment in a Final EIR. But at least one court has found that failure to circulate a Health Risk Assessment for public comment in a timely manner is a violation of CEQA. *King & Gardiner Farms*, *supra*, 45 Cal.App.5th at 895.

have not even begun. The District is thus asking for EIR review and approval before the scope of the project's environmental impacts are known or the scope of the required mitigation is discernable.

An EIR "should be prepared as early as feasible in the planning process to enable environmental considerations to influence project program and design and yet late enough to provide meaningful information for environmental assessment."[28] Here, the District does not yet have critical information that will determine the scope of the project and required mitigation. Proceeding on the basis of this premature EIR will have the effect of further locking the District into a plan of unknown scope, consequence, and feasibility. It is tantamount to "a study conducted after approval of a project" which meaningfully diminishes responsible decision-making and frustrates public input. Moreover, without knowing the cost of mitigation associated with the remaining on-site alternatives, the District cannot determine whether those alternatives are feasible, and thus cannot lawfully make the findings necessary under CEQA to approve one of those alternatives.

In addition to violating CEQA, the District is being fiscally reckless. It is proposing to spend $130 million (including hard and soft costs) on a 96,000 sq. ft. renovation, which amounts to $1,406 per square foot. Under normal circumstances, with a less challenging site, that price per square foot would yield high-end finishes and a seismically modern building. Unfortunately, what is being proposed here, at this same great expense, is a basic remodel with potentially no seismic retrofit. This is because this has always been the wrong site. The Renovation Option would be expensive, yet underwhelming, because the District would have to dedicate a projected $38 million – or 29% of the budget! – to toxic soil removal ($19.2 million) and temporary housing ($18.7 million),[29] all of which could be saved and spent on something more impactful and durable at another, safer, site. This is an expensive lipstick-on-a-pig proposal that leaves serious problems unaddressed.[30] The District cannot just sweep all of the project's environmental and financial problems under the rug in order to adhere to an unrealistic schedule.

VI. The EIR Improperly Rejects Reasonable Alternatives Based on Insufficient Evidence, Including Outdated Enrollment Projections

An EIR must "describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid

[28] CEQA Guidelines § 15004(a).
[29] Mill Valley School District, School Board meeting deck, August 14, 2025, attached hereto as Exhibit A.
[30] This adage is particularly apt, as this site regularly smells like a pigsty due to the sewage treatment plant, and what the District calls "smell days." In September 2025, the campus experienced what several students called "complete pandemonium" in their classrooms, when thousands of flies swarmed in after an uncapped waste incident at the sewer plant. The EIR concedes that the odor issue is "significant and unavoidable." (EIR, p. 19 [PDF pagination]).

or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. . . .[I]t must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation."[31] An EIR must therefore "include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project."[32]An EIR should also address whether "any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location," and if the agency concludes "no feasible alternative locations exist, it must disclose the reasons for this conclusion."[33] A finding that a particular alternative is infeasible must be supported by substantial evidence.[34]

The EIR rejects the idea of relocating the Middle School to the Edna Maguire site and dispersing the current Edna students to the District's four other elementary schools. However, in discarding this option as infeasible, the EIR relies on the 2024-25 enrollment *projections* set forth in the *2021* Master Facilities Plan (see footnote to EIR Appendix pdf page 307, which says "Note: student count from FMP projections for 24-25"). So, rather than looking at *actual* 2025 enrollment numbers or recent trends, the EIR travels back in time to 2021 to determine what people back then *thought* enrollment in 2025 *might* be. That is not a sound basis for analysis. The EIR's decision to reject this alternative based on outdated projections, rather than actual or updated enrollment data, is not supported by the evidence.

If we look at the actual enrollment numbers, and even other figures elsewhere in the EIR, the Edna Maguire option becomes easily feasible, as explained in detail in the materials from our website attached as Exhibit D to this letter and incorporated by reference.[35]

Briefly, the old 2021 projection indicates 617 Edna students.[36] The EIR then takes that outdated figure and uses it to say there would be about 150 Edna students added to the 4 other elementary sites under this option (for a total of 600 Edna students dispersed). That dramatically overstates how many students would actually need to be dispersed, as the actual Edna enrollment is 377 according to the District's latest enrollment update report.[37] Elsewhere, on its FAQ page, the District says there would be 428 students to disperse, with Old Mill taking 61, Park taking 79, Strawberry taking 104, and Tam Valley taking 154, at which point the District concludes this is

[31] CEQA Guidelines § 15126.6(a).
[32] CEQA Guidelines § 15126.6(d)
[33] CEQA Guidelines § 15126.6(f)(2)(A), (B).
[34] CEQA Guidelines § 15091(a)(3), (b).
[35] These materials are also *available at* https://www.mvmsmodernizationmess.com/other-ideas [as of Oct. 9, 2025].
[36] EIR Appendix, p. 307 [PDF pagination].
[37] Board Enrollment Update 2025-2026, dated August 28, 2025, *available at* https://static1.squarespace.com/static/668c4a0dd9348c745c994ccf/t/68c89998da9aa25603d52164/1757976984424/enrollment+25-26.pdf [as of Oct. 9, 2025].

infeasible because that leaves 30 students undispersed.[38] That is a really small delta, and it is easily closed by using the latest and correct enrollment figure, which is 377, not 428, and certainly not 617. Elsewhere, the EIR even stipulates that the current Edna enrollment is "under 400,"[39] yet the EIR ignores this reality in rejecting this otherwise promising alternative. The EIR needs to use consistent and correct enrollment data.

The enrollment data also impacts the traffic analysis. The "Mill Valley Middle School Reconstruction Project Traffic Study" from August 2024, says the "current Edna Maguire student enrollment is 436" but it then says that its "Alternative A" (to move MVMS to Edna and disperse the Edna students) would "replace Edna Maguire School permanently with the 1,100-student middle school."[40] That is not an apples-to-apples comparison, as it compares ostensible-but-outdated *actual* Edna enrollment to the MVMS *max capacity* enrollment, which is nowhere near its actual enrollment of 697. If instead, we compare the MVMS actual enrollment of 697[41] to the *max capacity* enrollment for Edna – 679 students according to the 2021 Master Plan[42] – that means moving MVMS to Edna would add only about 18 more students than Edna is currently designed to accommodate. That number was already approved for the Edna site long ago, with all relevant traffic studies and neighborhood settlements, and that was before any new traffic mitigation plans, which would further mitigate the traffic. The traffic analysis should also look at the percentage of middle school vs. elementary school students that actually bike or walk to school.

In analyzing and approving the feasibility of the Dual-Schools Option, the EIR says "hours of classes for the two schools would be staggered by half an hour or 45 minutes to reduce traffic congestion. This would eliminate most of the [traffic level of service] degradation. It should be noted that the Marin County Department of Public Works is currently proposing a Renovation program for Lomita Drive that includes sidewalk extension and other roadway improvements that would improve the situation."[43] If the District believes, and the EIR concurs, that the traffic situation is thus viable with the *Dual-Schools* Option, then it is certainly viable with only MVMS at that Lomita site, particularly when the number of MVMS students is only slightly above the

[38] District Bond FAQs, *available at* https://www.mvschools.org/135135_3 [as of Oct. 9, 2025].
[39] EIR, p. 259 [PDF pagination]..
[40] "Mill Valley Middle School Reconstruction Project Traffic Study", PHA Transportation Consultants, August 2024, EIR Appendix, pp. 219 and 222 [PDF pagination].
[41] Board Enrollment Update 2025-2026, dated August 28, 2025, *available at* https://static1.squarespace.com/static/668c4a0dd9348c745c994ccf/t/68c89998da9aa25603d52164/1757976984424/enrollment+25-26.pdf [as of Oct. 9, 2025].
[42] Mill Valley School District Facilities Master Plan, 2021, p. 33, *available at* https://static1.squarespace.com/static/668c4a0dd9348c745c994ccf/t/68c89b2dafe8454dd8037224/1757977389049/2021+Facility+Master+Plan+.pdf [as of Oct. 9, 2025].
[43] Mill Valley Middle School Reconstruction Project Traffic Study", PHA Transportation Consultants, August 2024, EIR Appendix, p. 263 [PDF pagination].

existing max capacity for Edna. Traffic and emergency ingress/egress are important issues, but they are being exaggerated at community meetings beyond what the data supports. The EIR needs to clarify the traffic and enrollment figures and discuss the extent to which sensible mitigation could address this community concern.

This alternative, for MVMS to reside at Edna, is compelling and worth careful, accurate analysis in the EIR because:

- It would meet all of the District's goals, as set forth in the EIR, and would actually do a better job of achieving objectives 5 and 6 (addressing concerns related to sea level rise odors, and site conditions, and constructing climate resilient facilities) than any of the alternatives on the current site.[44]

- The site is seismically much safer, with a modern foundation and no liquefaction zone.

- There are no toxic soils, explosive methane, or other health risks, which would enhance safety for students and teachers, while also reducing the District's toxic tort liability exposure.

- No students would have to endure construction noise. The Middle School students would remain at the current site until Edna is ready. Edna students could join their new schools before construction begins at the Edna site.

- It would result in a sustainable building that avoids the sea level rise "island" effect and leaching contamination.

- There would be no more sewer smell for any students.

- There would be no need to spend money on a temporary campus and toxic soil removal, thus permitting a more efficient and durable use of taxpayer dollars.

- There would be no need for students to move mid-year.

- Compared to the Dual-School Option, this would significantly mitigate traffic impacts in the neighborhood and promote public safety during emergencies.

[44] EIR p. 43 [PDF pagination].

- The current Middle School and Edna have comparable acreages. Per the EIR, MVMS is on 8 acres,[45] (though the 2021 Master Plan lists it at 10.3 acres)[46] while Edna is listed at 9.1 acres in the 2021 Master Plan.[47]

- With its 9.1 acres, Edna Maguire serves 366 students (16% of the District's student population). For comparison, Park has 308 students on 3.1 acres[48] and MVMS has 698 on somewhere between 8 and 10.3 acres.

- This would keep Grades 6-8th together.

- This would hopefully allow the District to retain their current tenant, West America Tae Kwon Do, as middle school students also enjoy this after-school activity.

As a variation on that theme, the District should also explore adding a smaller elementary school to the Terra Marin location, so that children in that area still have a neighborhood elementary school, while mitigating the traffic and crowding concerns that are causing such dissatisfaction with the Dual-Schools Option. The Draft EIR improperly rejects these and similar options based on cursory, inadequate description and analysis, without proper supporting evidence.

VII. The District's Timeline Is Unrealistic

Given the deficiencies in the EIR, the District's published schedule is unrealistic. As discussed above, the District proposes to certify the Final EIR in December 2025, before DTSC concurrence on the PEA (or, potentially, the revised Health Risk Assessment), and without preparing a revised Draft EIR that identifies, adequately analyzes, and provides mitigation for the version of the project the District actually intends to consider. The schedule then assumes construction could begin in June 2026 and finish in December 2028.

Promising a 2026 construction start creates false expectations and undermines public trust, particularly as other aggressive targets have already been repeatedly pushed back. Asking the school board, and the public, to choose between competing alternatives without final scope and cost information could again yield wasted efforts and pointless community discord. Rather than trying to project false confidence, the District should honestly disclose to the public where information gaps remain, what they are doing to close them, who has to approve various aspects of the project, how long that will take, and what the District is doing to preserve bond funds in the meantime. Until the District completes all three phases of the PEA process, with DTSC

[45] EIR p. 135 [PDF pagination].
[46] 2021 Master Plan, *supra,* p. 84.
[47] *Id*. at p. 74.
[48] *Id*. at p. 78.

concurrence, prepares a new Draft EIR that actually identifies a proposed project and meaningfully analyzes feasible alternatives, and receives assurance from the Division of State Architect and California Geological Survey that whatever project it intends to build can actually be built, further steps toward approval are premature.

VIII. Requests

We therefore respectfully request that the District:

1. Withdraw the current Draft EIR and recirculate a revised Draft EIR that complies with CEQA's requirements, including requirements for an accurate project description and meaningful analysis of alternatives.

2. Complete the PEA process, address DTSC's comments, and secure DTSC's concurrence before proceeding with CEQA review. Ensure the revised Draft EIR incorporates definitive findings from the PEA regarding whether soil mixing, ground improvement, or foundation replacement will be required, and whether such measures are financially feasible.

3. Secure approval from the Division of State Architect and California Geological Survey before finalizing CEQA review and making a decision on the project.

4. Identify financially viable options first, and only then recommence CEQA review limited to financially feasible alternatives.

5. Ensure that the revised Draft EIR provides full project-level analysis of the viable alternatives, including geotechnical and structural requirements.

6. Refrain from expending material amounts of bond funds, entering into contracts for construction or temporary classrooms, or taking further action on the project until a revised Draft EIR has been completed and circulated.

7. Suspend discretionary spending on Measure G projects, including at the elementary sites, until the District determines whether portable classrooms or other basic facilities will be required at the elementary sites, instead of mere discretionary improvements.

8. Release a realistic project timeline that avoids moving children mid-year.

9. Expand the alternative analysis to include the potential for (i) converting Edna Maguire to serve as the middle school site, dispersing the current Edna students to the remaining

elementary sites, and (ii) same as the foregoing, but with the variation of constructing a smaller Edna elementary school at the Terra Marin site.

10. Within the alternatives related to Edna Maguire, use accurate enrollment figures and add more traffic mitigation options, such as a common drop off point with shuttles, as well as acknowledge planned street improvements that could further address this impact.

11. When evaluating the feasibility of the Edna alternatives, utilize updated and accurate enrollment data, not projections from 2021 that are artificially high.

IX. Conclusion

The District and its consultants vastly underestimated the environmental and geological problems at the current middle school site and mitigation costs required for the Discarded Rebuild Project. Now they are proposing a limited renovation done at the cost of a completely new high-end build. The proposed remodel lacks the details needed to estimate cost and safety: The necessity of soil mixing for those project components, the service life of the renovated building, or measures to address seismic risk, sea level rise and its impact on the soil cap over the dump all have yet to be addressed in a meaningful way.

The EIR improperly rejects the feasible alternative of relocating MVMS to the Edna Maguire site based on outdated student enrollment data. The option for a permanent campus on Edna's site with either student relocation or smaller elementary school at Terra Marin is a feasible solution, as indicated on page 268 of the Draft EIR, especially when buttressed with actual, not projected, enrollment numbers and realistic trends.

Yes, there would be challenges: transportation logistics, preservation of cultural sites, and accommodation of neighborhood services like West America Taekwondo. But these pale in comparison – in both risk and cost – to maintaining a campus on a toxic dump prone to liquefaction and near-term flooding. **This site is simply too risky and too expensive.**

Let's challenge the District's consultants to offer practical and sustainable solutions. Let's also ensure our tax dollars are wisely invested in a safe and resilient facility that can be used for decades to come and that will make the community rightly proud of our excellent public schools.

The community is entitled to an honest and thorough analysis of the true scope, costs, and environmental impacts of the project actually under consideration, not one already deemed infeasible. Until the District complies with CEQA and Education Code requirements, further action would be premature, legally vulnerable, and fiscally irresponsible.

Thank you for considering these comments.

Respectfully submitted,

MVMS Modernization Mess,

an association of concerned parents

Exhibit A

School Board Meeting, Modernization Project Update Deck

August 14, 2025



Board of Trustees

August 14, 2025



Meeting Agenda & Purpose

Purpose:

- Share current project budget and scope, and identify impacts to preferred project budget
- Propose two alternatives identified in the draft Environmental Impact Report (EIR)
- Consider pros, cons, and potential mitigation efforts for each alternative
- Determine feasibility of alternatives in preparation for final site selection following certification of EIR



Objectives of Measure G

- Upgrade MVMS facilities to current educational, safety & security and accessibility standards
- Enhance science, technology, engineering and math classrooms
- Modernize outdated electrical, plumbing, heating and ventilation systems
- *Address concerns related to projected future sea-level rise, odors and site conditions*
- *Construct climate-resilient and sustainable facilities and implement "green building" practices*



Project Budget and Scope

$130 M	September 2023	• Board direction
+$22.6M	September 2024	• Replace pier foundation with deep soil mixing • Escalation due to extended schedule • raising site grade
$134 M	September 2024	• Value engineering: reduction of project size
+$23 M	June 2025	• Soil removal
$156 M	August 2025	• Scope no longer feasible • Alternatives to preferred project considered for $95 M budget



Current Project “Hard Cost” Budget

Revised Hard Cost Budget - $95 M

Within Hard Cost Budget

- Construction Costs
- Contingency (Contractor, DSA)
- Additional Year of Escalation (Delays)

Held Outside of Hard Cost Budget

- Reserve for landfill soil disposal ($19.2 M)
- Additional soft costs (AE, GC, survey, geotech, etc)
- Additional contingency for modernization (10%)

Alternatives to Preferred Project

$95 M Budget



Two Alternatives to Preferred Project Meet $95M Hard Cost Budget

- **Alternative 1**: Renovation of existing MVMS campus
- **Alternative 2**: Campus co-located at the Lomita Campus with Edna Maguire

Alternative 1

Renovation of Existing MVMS

Alternative 1

Potential Renovation of Existing MVMS Campus ($95 M)

• Fire sprinklers	$1.5M
• New elevator/related construction	$2.2M
• Accessibility upgrades incl. restrooms	$0.75M
• Interim housing	$18.7M
• Exterior skin upgrade (siding & windows)	$14.5M
• Interior finishes (floor/walls)	$9.1M
• Electrical upgrades	$5.8M
	$52.55M

Potential Additions:

• Exterior canopies	$2.8 M
• Mechanical including air conditioning	$9.2 M
• Renovation of existing gym	$7.5 M
• New STEM building	$4.3M
	$23.8M

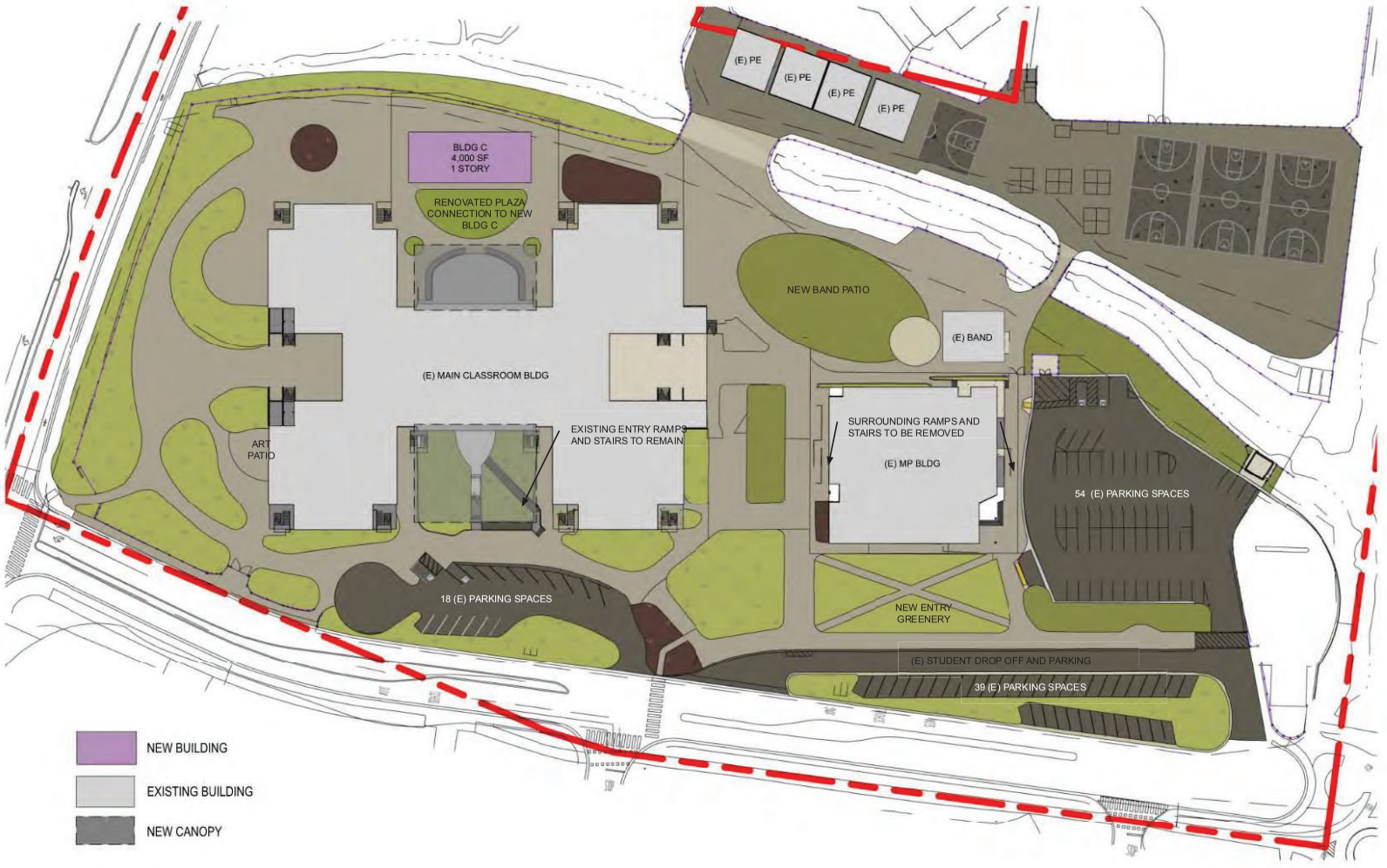


Alternative 1 - Existing MVMS Site Plan

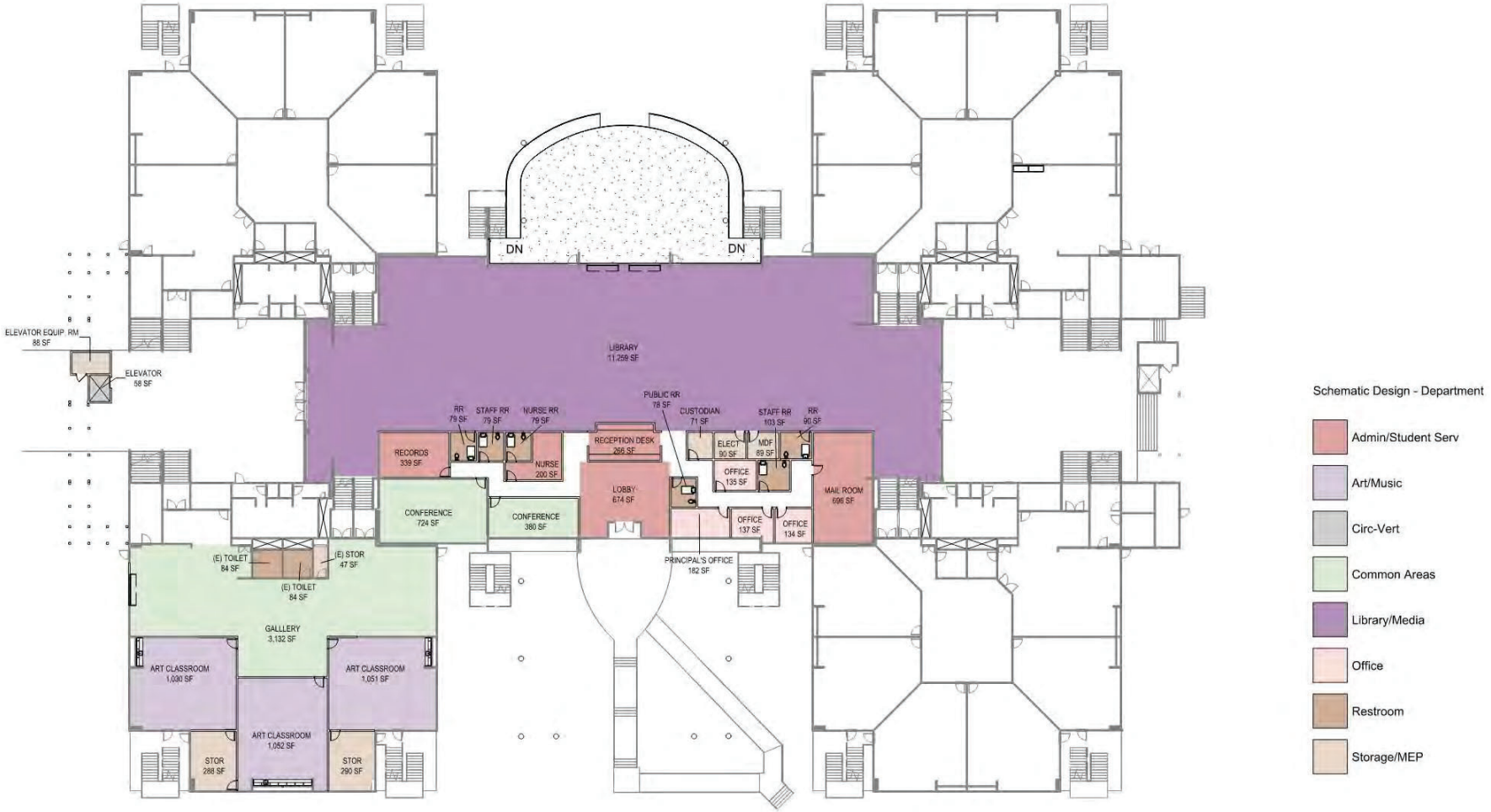


Alternative 1 - Proposed Site Plan

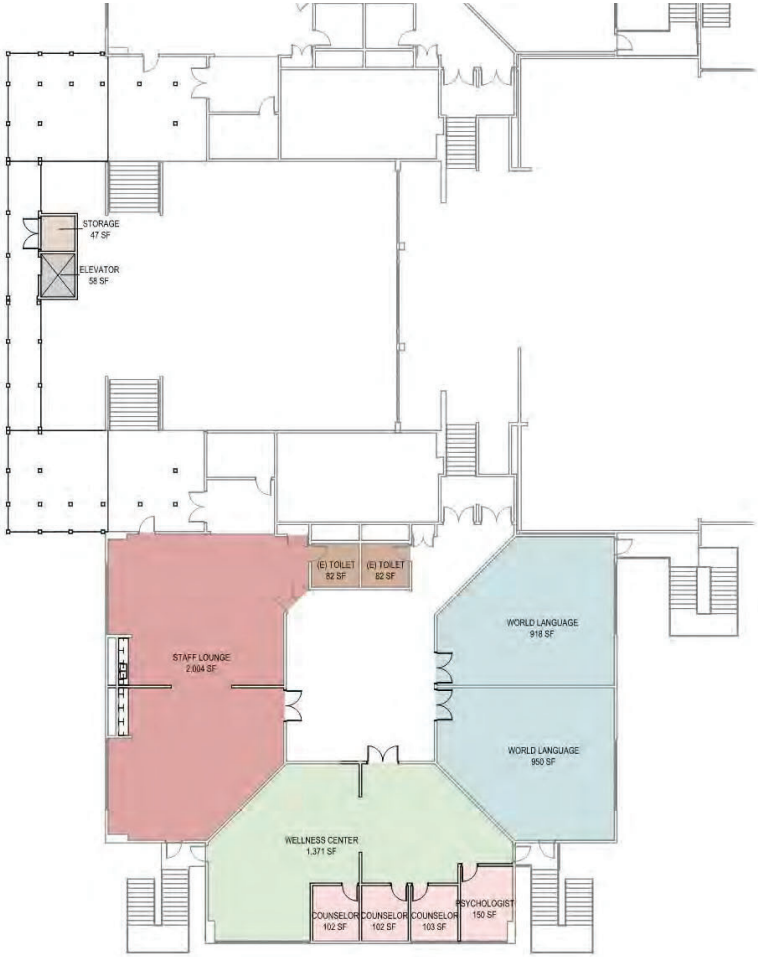
Parking Option 1



Alternative 1 - Renovation Main Classroom Building



Alternative 1 - Renovation of Main Classroom Building





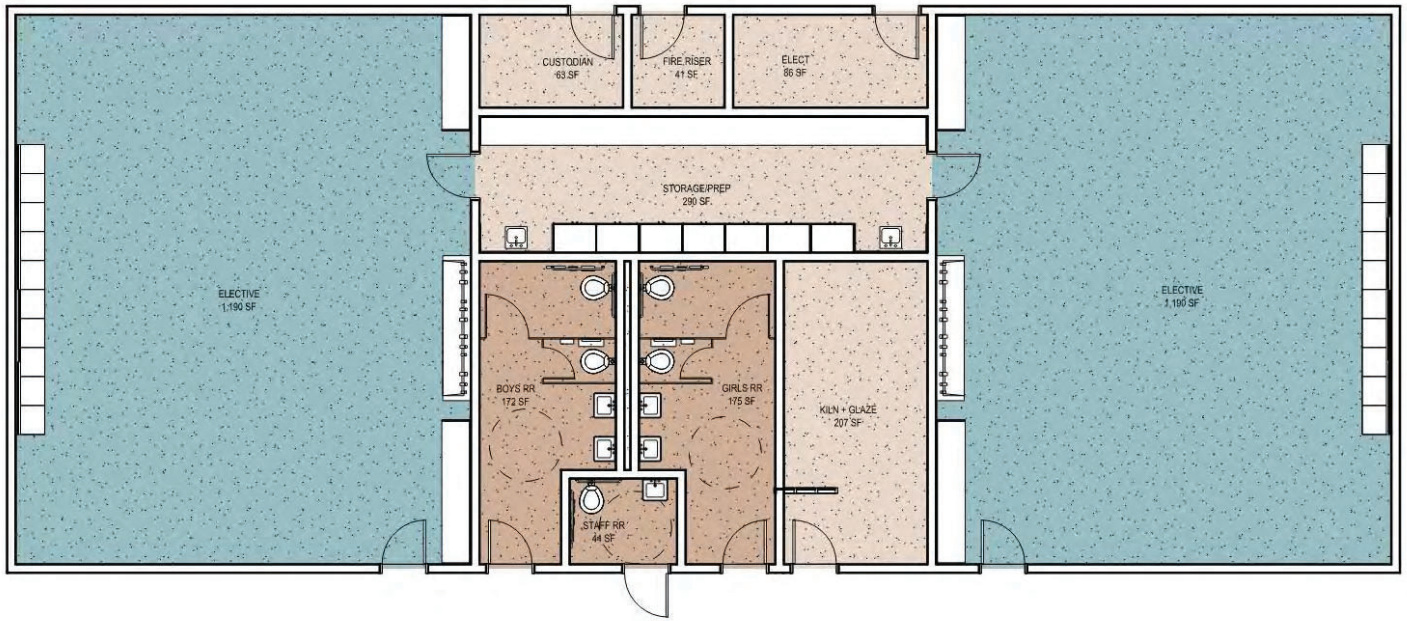
Alternative 1 - Renovation of Multi Purpose Building



Schematic Design - Department

- Art/Music
- Circ-Horiz
- Circ-Vert
- Kitchen
- PE/Gym/Locker Rooms
- Restroom
- Storage/MEP

Alternative 1 - Building C (New Building)



Schematic Design - Department

- Lab
- Restroom
- Storage/MEP

Existing MVMS



EXISTING MAIN ENTRANCE



EXISTING LIBRARY EXTERIOR

MVMS Renovated Main Entrance









MVMS New Exterior - Library Courtyard



Alternative 2

New Middle School Site at Terra Marin Lomita Campus Co-located with Edna Maguire Elementary

Alternative 2: Current Site Plan for Terra Marin Lomita Campus



Alternative 2: New Middle School at Terra Marin Lomita Campus



Alternative 2: Enlarged Site Plan



Alternative 2 - Campus Entry



Alternative 2: Interior Campus



Comparison of Alternatives

Comparison of Alternatives

Alternative 1 - Renovation of Current Mill Valley Middle School

PROS	CONS
Leverage existing campus and classrooms	Campus still adjacent to sewer plant
Significant improvement to current site	Campus still located on landfill
Maintains 12 classrooms per grade level	Campus still vulnerable to sea level rises
Minimal impact to community	
Maintains integrity of 6-8 campus where all children from all 5 schools come together as a community	
Leverages largest acreage available and appropriate to middle school design (site adequacy per CDE guideline)	
Can accommodate enrollment increases (ADA 1100)	
Central location supports walking/biking, minimizing transportation	

Mitigation: Additional mitigation measures to be identified in EIR

Comparison of Alternatives

Alternative 2 - New Middle School at Terra Marin Lomita Campus

PROS	CONS
New construction	Acreage at Edna/Terra Marin/Lomita Drive campus does not me CDE guidelines for middle school (let alone TK-8)
New gymnasium	Cannot accommodate increased enrollment (ADA 1100)
No interim housing required	Elementary and middle school students on same campus
	Shared use of some spaces
	Loss of single, centrally located campus for grade 6-8 students
	Requires demolition of Terra Marin site and district maintenance buildings
	Impacts Edna community which already experienced renovation for Measure B
	Increases traffic congestion across city/county as children from all areas convene at Edna
	Displaces West America Tae Kwon Do

Mitigation:

- **Staggered start and end of school**
- **Bus transportation**
- **Additional mitigation to be identified in EIR and feasibility studies**

Benefits of Both Alternatives

Enhanced security
Enhanced accessibility
Modernized facilities
Improved electrical, plumbing, heating & ventilation systems
Improved climate resilience and sustainability

Considerations for Interim Housing

Interim Housing

Alternative 1:

- Grade 6 at Terra Marin Lomita Campus and Grades 7 & 8 at existing Mill Valley Middle School Site

Alternative 2:

- Temporary Middle School at Terra Marin Lomita Campus

Comparison of Interim Housing Alternatives

Alternative 1 - Grade 6 at Terra Marin Lomita and Grades 7-8 at Existing Mill Valley Middle School

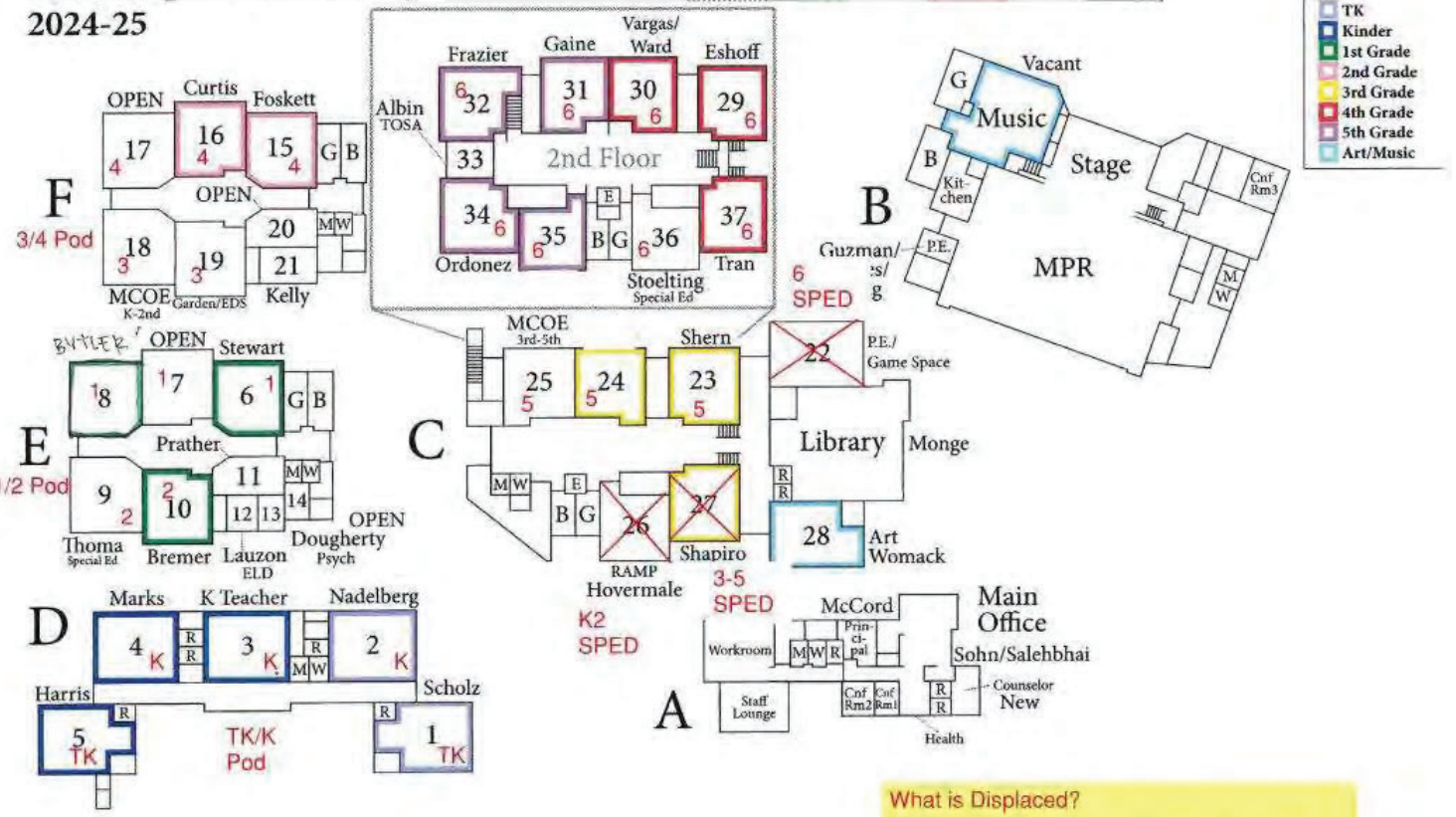
PROS	CONS
Reduces need for interim classrooms by one grade level	Divides 6-8 grade educational programming
6th grade enrollment on Terra Marin Lomita campus does not exceed maximum enrollment for Edna	Divides 6-8 grade student community
	Split site creates credential and staffing issues
	Creates safety, logistics, and supervision concerns with divided administrative and supervision staff
	Interrupts development of 6-8 campus culture at MVMS following years of administrative turnover
	Students remain on campus during active construction

Mitigation: Additional mitigation measures to be identified in EIR.

Note: **Deep soil mixing may be required for interim housing at MVMS, making this option too costly to consider.**

06/30/25	TK	K	1st	2nd	3rd	4th	5th
EM	20	21	20	24	21	20	19
	20	21	20	23	21	19	19
		20	20			19	19

Edna Maguire Elementary
2024-25



What is Displaced?

- MCOE (2) - **To another site?**
- RAMP (1) - Conference Room 3
- Garden/EDS (1) - In MPR
- PE/Game Space (1) - Not Required

Comparison of Interim Housing Alternatives

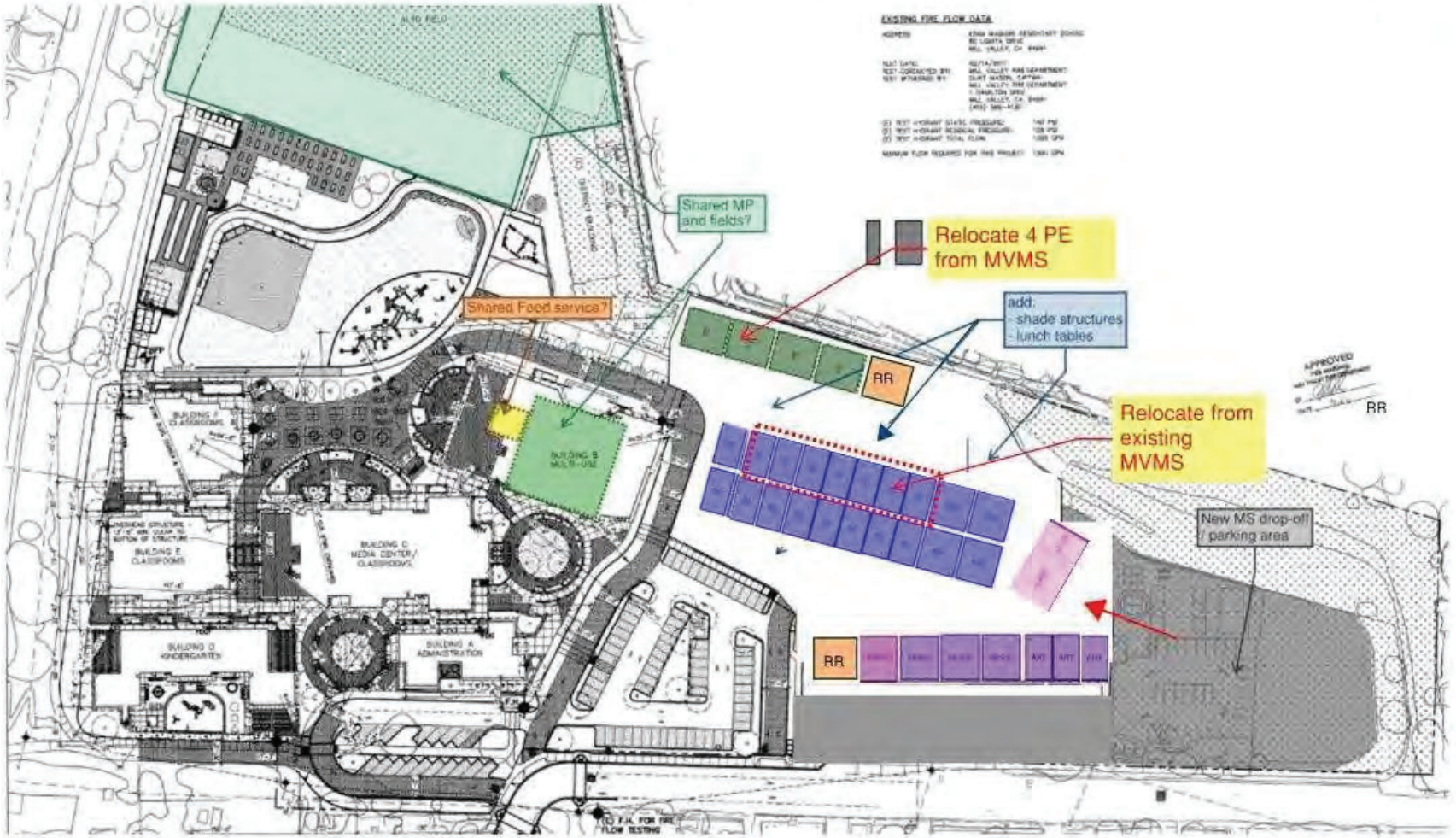
Alternative 2: Temporary Middle School at Terra Marin Lomita Campus

PROS	CONS
Maintains comprehensive 6-8th grade middle school program and experiences for : ● students ● staffing ● administration; and ● supervision	Places middle school students on same campus as elementary students temporarily
Avoids impacts of active construction at the existing Mill Valley Middle school site	Temporarily increases traffic congestion across the City
Temporary housing may be repurposed later for other programming (e.g. district office)	Temporarily impacts Edna Maguire community which has already experienced a bond program
	Requires demolition of Terra Marin, M&O, and district warehouse
	Requires relocation of district warehouse, M&O, and West America Tae Kwon Do

Mitigation:

- Staggered start/end times
- Bus transportation
- Potential portable allocation for West America Tae Kwon Do
- Additional mitigation measures will be identified in EIR and feasibility studies

Interim Housing Middle School Site Plan Test Fit (6th Grade In Existing Space)



Schedule and Next Steps



Schedule

- 45 Day Draft EIR Public Comment: September 2 - October 16
- Response to Comments: October 16 - December 1
- Final EIR Certification: December 1
- Site Selection: December 1
- Start of Construction: June 2026
- Complete Construction: December 2028



Outcomes Needed

Identification of questions and additional information needed for the consideration of alternatives

MVMS Modernization Mess
an association of concerned parents
mvmsmodernizationmess.com | mvmsmodernizationmess@gmail.com

Exhibit B

Mill Valley Middle School Reconstruction Hazardous Soil Volumetric Analysis

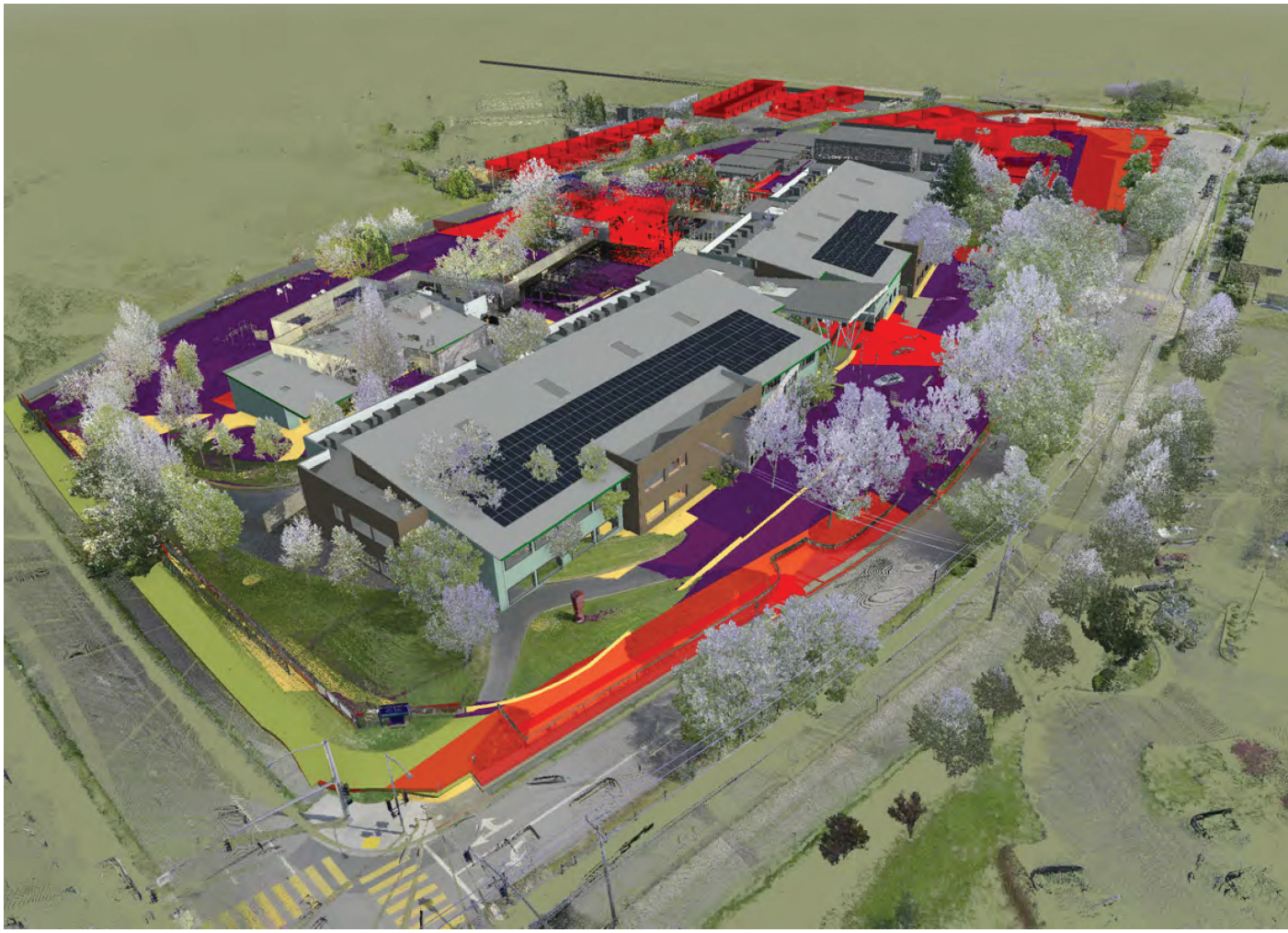
Prepared by Flint

June 6, 2025

MILL VALLEY SCHOOL DISTRICT

MILL VALLEY MIDDLE SCHOOL RECONSTRUCTION HAZARDOUS SOIL VOLUMETRIC ANALYSIS

June 6, 2025



FLINT

A Better Building…A Better Building Experience!

1. Background and Objectives 1

2. Key Terms & Definitions 2

3. Methodology and Assumptions 3

4. Results and Conclusions 5

5. Summary of Off-Haul Volumes from 100% DD Estimate 6

6. Risks and Opportunities 8

7. Summary 9

8. Appendices 10

Appendix A: FLINT Remediation Cost Estimate

Appendix B: GBI Proposal and Takeoff Package

Appendix C: PEA Sampling Figures and Contam. Extent Modeling

Appendix D: Ninyo & Moore Bore Hole Test Results

1. BACKGROUND AND OBJECTIVES

BACKGROUND AND OBJECTIVES

In response to evolving environmental findings and the historical characterization of the Mill Valley Middle School site, FLINT Builders was directed by the project's program manager (AECOM) to undertake a focused volumetric modeling study. This report is intended as a conservative planning baseline, designed to support CEQA readiness, cost forecasting, and risk management. The purpose of the study was to quantify the potential impact of hazardous soil mitigation across the project site under the assumption of full development per the 100% Design Development (DD) documents.

PRIMARY OBJECTIVES

» Accurately estimate the cubic yardage and tonnage of soil expected to be excavated and disturbed during construction.

» Distinguish between Class 1 (RCRA and non-RCRA) and Class 2 ADC material based on available soil testing and sampling data.

» Identify the additional export volume needed to provide a 3-foot clean soil buffer below finished grade, as required for compliance with anticipated DTSC mitigation criteria for school sites.

» Establish the cost and volume delta between the 100% DD design assumptions and the updated remediation requirements for board-level decision-making.

This study integrates the following inputs:

» Grading and utility subgrade models from the 100% DD civil design package.

» Soil sampling and lab results from Ninyo & Moore's Preliminary Environmental Assessment (PEA), including STLC and TCLP exceedance locations and classifications.

» Detailed volumetric takeoffs and zone mapping developed by Goodfellow Bros. Inc. (GBI), an excavation and remediation subcontractor.

» Civil engineering input from Tyson Robertson, PE (Brelje & Race), particularly in relation to soil cap design and import material acceptability.

The methodology assumes a full cut-to-subgrade construction approach, inclusive of trenching, foundation preparation, and structural backfill, and uses a conservative 2.0 tons per cubic yard conversion for export tonnage due to shallow groundwater conditions and the heavy nature of saturated soil.

This report takes a conservative approach in estimating the scope and impact of hazardous soil removal. The assumptions used are not intended to reflect a best-case or worst-case scenario, but rather a precautionary planning baseline based on the available site data and environmental regulations. The goal is to ensure sufficient contingency for compliance, cost transparency, and schedule planning, not to define the final field conditions or mitigation strategy.

2. KEY TERMS AND DEFINITIONS

KEY TERMS AND DEFINITIONS

This section defines key terminology, acronyms, and classification references used throughout the report to ensure consistency and avoid ambiguity for all reviewers.

SOIL CLASSIFICATION DEFINITIONS

» Class 1 RCRA: Soils classified as hazardous waste under federal Resource Conservation and Recovery Act (RCRA) thresholds, requiring out-of-state rail disposal.

» Class 1 Non-RCRA: Soils exceeding California state hazardous limits (e.g., STLC) but not meeting federal RCRA criteria; typically stabilized and trucked to Class 1 landfills in-state.

» Class 2 ADC (Alternative Daily Cover): Soils that are not hazardous but exceed reuse thresholds and are accepted for daily cover at Class 2 municipal landfills.

TECHNICAL TERMINOLOGY AND ACRONYMS

» TTLC/STLC/TCLP:

  › TTLC - Total Threshold Limit Concentration: If the soil concentration is equal to or greater than the TTLC limit, it is considered a California hazardous waste.

  › STLC - Soluble Threshold Limit Concentration: analyzed if concentration equals or exceeds STLC threshold by a factor of 10 or more (STLC trigger value). Exceedance of the STLC indicates the sample is considered a California hazardous waste.

  › TCLP - Toxicity Characteristic Leaching Procedure: analyzed if concentration equals or exceeds the TCLP threshold by a factor of 20 or more for federally regulated metals (TCLP Trigger value). Exceedance of the TCLP indicates the sample is considered a federal hazardous waste.

» DSM – Deep Soil Mixing: A ground improvement method involving in-situ mixing of native soil with stabilizing agents to improve structural properties.

» Cap Delta: Refers to the additional excavation required below design subgrade to provide a 3-foot clean Cap buffer between contaminated zones and finished grade, as required by DTSC guidance.

» Remediation: For the purposes of this report, remediation refers to the off-haul and disposal of contaminated soils located within or below the design subgrade that are expected to be encountered during mass grading, trenching, or excavation.

» ADC – Alternative Daily Cover: Material used at landfills to cover compacted solid waste at the end of each day's operation.

PHASING DEFINITIONS

» Phase 1 refers to the interim housing scope located on the eastern portion of the site. This includes site grading, utility tie-ins, installation and relocation of temporary modular classroom facilities to support ongoing school operations during construction.

» Phase 2 encompasses the main campus redevelopment on the western portion of the site. This includes demolition of existing buildings and full construction of the new middle school campus and associated site improvements.

3. METHODOLOGY AND ASSUMPTIONS

METHODOLOGY AND ASSUMPTIONS

This study employed a volumetric analysis approach to determine the quantities of soil requiring export based on contamination status, in alignment with the 100% Design Development (DD) plans and current environmental data.

MODELING FRAMEWORK

The following inputs formed the technical foundation for all calculations:

» PEA Laboratory Data: Based on STLC and TCLP exceedances from Ninyo & Moore.

» Design Subgrade Models: Subgrade elevations for mass grading, trenching, and deep soil mixing (DSM) were derived from the 100% DD civil design plans.

» Takeoff Quantities by Zone: GBI provided excavation quantity takeoffs with clear breakout by contaminant classification, construction phase, and scope element (e.g., trenching, DSM spoils, 3' cap delta).

» Utility Trench Profiles: Volume of contaminated trench spoils was modeled based on proposed trench geometry and invert depths, cross-referenced against classified soil zones.

HAZARDOUS ZONE CLASSIFICATION LOGIC

Soil classification was determined by using step-out modeling from confirmed contamination boreholes:

» Where no clean boring existed between two contaminated ones, the entire interval was classified as hazardous.

» Three visual models were developed and reviewed:

  › 20-foot offset from contaminated samples.

  › Midpoint logic between clean and dirty borings.

  › Maximum-conservative extension to the next boring without clean validation.

» The final takeoff was based on the most conservative approach, extending contamination zones to the nearest clean sample or boring location. This method reflects a conservative assumption recommended by Goodfellow Bros., a remediation subcontractor, and was used to guide the final modeling and quantity takeoffs. (See Appendix Figures 3A–3C.)

KEY ASSUMPTIONS

» DSM Spoils (Deep Soil Mixing)—Spoil volumes generated from deep soil mixing were calculated using a 35% Area Displacement Ratio (ADR), which aligns with the estimate provided in the 100% DD budget. This assumption was selected as a conservative planning basis due to its significant influence on total export volumes and cost.

  While the project geotechnical report recommends a minimum ADR of 20%, consistent subcontractor input based on similar project conditions suggests that 35% is a more realistic upper-bound value, particularly for sites with high moisture content and closely spaced DSM columns. This 35% ADR was also used in a formal budget submitted for the project, where spoil volumes were projected at approximately 18,000 CY for the 35% case (compared to 10,000 CY for the 20% case)

  Although field conditions may ultimately support a lower displacement ratio, the decision to retain the 35% ADR in this analysis was made to avoid underestimating the impact of this high-cost activity. Final export volumes may be adjusted downward if testing or construction sequencing confirms lower spoil generation. Until then, the 35% figure ensures sufficient buffer for environmental compliance, staging logistics, and haul/disposal planning.

» DSM Spoils Hazardous Classification Assumption—All DSM spoils are conservatively classified as Class 1 Non-RCRA due to the deep and widespread nature of the mixing operation. The DSM scope follows a grid formation across large site areas and disturbs deeper soils. The site's tidal water table raises the potential for vertical and lateral migration of contaminants, meaning deeper layers may contain residual hazardous constituents even if not directly tested.

  Notably, one area currently targeted for DSM contains STLC/TCLP exceedances consistent with RCRA thresholds. While this zone is expected to be excavated in advance, its proximity and overlap with DSM activity reinforces the assumption of potential exposure to hazardous material.

  As such, the entire DSM volume has been modeled as Class 1 Non-RCRA to align with DTSC expectations, disposal permitting, and conservative budget planning.

» 3' Clean Cap Requirement— A minimum 3-foot vertical buffer of clean soil between finished grade and any underlying contaminated material was assumed, consistent with standard DTSC mitigation guidance for school sites. This requirement triggered additional export volumes above the original subgrade design, categorized in this report as the "Cap Delta."

  To backfill these exported volumes, the model assumes the use of imported structural fill material compliant with the recommendations of the civil engineer (Tyson Robertson, Brelje & Race). Specifically, the replacement material is required to have a maximum dry density of 120 lbs/CF or less, to maintain compatibility with adjacent lightweight fill and avoid triggering further design impacts. This guidance was confirmed via project correspondence and serves as the basis for the material specification reflected in the estimate.

» Exclusion of Over-Excavation—No contingency has been included for discretionary over-excavation or inspector-directed extensions beyond the mapped contamination limits unless explicitly shown in the model zones.

REPORTING INTENT

The results presented in this report reflect a conservative planning baseline intended to support CEQA readiness, environmental compliance, cost forecasting, and stakeholder decision-making. The modeled values are not intended to be literal representations of field conditions, but rather reflect a precautionary approach developed through the interpretation of available sampling, testing, and design data.

Where uncertainty exists, the methodology favors conservative assumptions, including expansion of hazardous zones and higher spoil conversion factors to avoid underestimating the scope of mitigation or cost exposure. This analysis does not prescribe mitigation strategies, but rather quantifies expected impacts based on current environmental information and design intent to help inform future planning and regulatory engagement.

4. RESULTS AND CONCLUSIONS

RESULTS AND CONCLUSIONS

EXPORT SUMMARY—BASED ON FLINT ESTIMATE

SCOPE AREA	VOLUME (CY)	CLASSIFICATION	TONNAGE (TN)
Phase 1 – Class 1 RCRA (SB-12-10)	45	Class 1 RCRA	90
Phase 1 – Class 1 Non-RCRA	4,725	Class 1 Non-RCRA	9,450
Phase 1 – Class 2 ADC Soil	6,160	Class 2 ADC	12,320
Phase 2 – Class 1 Non-RCRA	2,935	Class 1 Non-RCRA	5,870
Phase 2 – Class 2 ADC Soil	14,860	Class 2 ADC	29,720
DSM Spoils – Class 1 Non-RCRA	18,000	Class 1 Non-RCRA	36,000
Utility Spoils – Class 1 Non-RCRA	386	Class 1 Non-RCRA	772
Utility Spoils – Class 2 ADC	219	Class 2 ADC	438
3′ Clean Cap Delta – Class 1 Non-RCRA	7,100	Class 1 Non-RCRA	14,200
3′ Clean Cap Delta – Class 2 ADC	4,795	Class 2 ADC	9,590
TOTAL EXPORT	**59,225 CY**		**118,450 TN**

IMPORT SUMMARY—3′ CLEAN CAP REPLACEMENT ONLY

SCOPE AREA	VOLUME (CY)	MATERIAL TYPE	NOTES
3′ Clean Cap Replacement Fill	11,895	Structural Fill (≤120 lbs/CF)	Replacement of exported cap zone only

This represents the only additional import volume beyond what was already carried in the 100% DD estimate. All other general grading, backfill, and structural fill quantities associated with rough grade, finished pads, structural slabs, and utility trench backfill were already included in the DD estimate assumptions. The above 11,895 CY reflects the additional import needed solely to backfill the clean cap volume exported below the design subgrade to satisfy the 3-foot environmental buffer requirement.

5. SUMMARY OF OFF-HAUL VOLUMES FROM 100% DESIGN DEVELOPMENT ESTIMATE

SUMMARY OF OFF-HAUL VOLUMES FROM 100% DESIGN DEVELOPMENT ESTIMATE

The following table summarizes the soil export quantities that were included in the FLINT 100% Design Development (DD) estimate dated 11-14-24 (Rev. 2). These quantities reflect measurements based on general grading, structural excavation, DSM spoils and utility installation scopes.

SCOPE AREA	VOLUME (CY)	NOTES
Phase 1 – Rough grading (Civil Eng.)	2,813	Modeled grading cut/fill based on site plan
Phase 1 – Export allowance (other trades spoils)	1,500	Placeholder for trenching, footings, minor utilities, and sitework cuts
Phase 1 – Off-haul spoils for cellcrete	2,813	Excavation associated with structural slab/lightweight fill areas
Phase 2 – Rough grading (Civil Eng.)	15,561	Sitewide cut/fill across building and site pad areas
Phase 2 – Export allowance (other trades spoils)	2,000	Placeholder for general excavation for trenching, piping, vaults, flatwork, and shallow improvements
Phase 2 – Off-haul spoils for cellcrete	15,270	Major excavation for structural slab/lightweight fill areas
DSM Spoils	18,000	Based on 35% Area Displacement Ratio for DSM volume

Total Off-Haul Volume from DD Estimate: 57,957 CY.

This value has been verified to match the official line items in the FLINT DD estimate backup. It serves as the baseline reference for comparison against the current volumetric analysis.

Delta in Off-Haul Volume: +1,268 CY between current modeling and DD estimate.

In comparison, the updated hazardous soils modeling identifies a total of 59,225 CY of off-haul volume, an increase of 1,268 CY over the 100% DD baseline. While the overall change in export quantity is modest, the updated analysis introduces a major distinction: all export volumes are now classified by waste type (Class 1 RCRA, Class 1 Non-RCRA, Class 2 ADC), and specific allowances are made for 3' clean cap separation, trenching spoil classification, and conservative DTSC compliance assumptions.

COST SUMMARY

The table below summarizes the cost impact associated with the hazardous soil mitigation scope, including all modeling outputs, off-haul classification, subcontractor estimates, and applicable markups. Credits from the original 100% DD estimate have been applied to reflect previously assumed soil export, resulting in a net construction subtotal.

ITEM	AMOUNT
Hazardous Soil Scope	$21,598,174
FLINT DD Estimate Credit	–$3,933,332
Construction Subtotal	**$17,664,842**
Contingency + Markups	$5,899,766
TOTAL BUDGET (CONSTRUCTION)	**$23,564,608**

This value reflects the anticipated cost impact of contaminated soil removal and disposal, including classification, haul-off, wheel washing, DSM spoils, trench spoils, and 3' clean cap separation. It represents a planning-level estimate based on conservative regulatory assumptions and volumetric modeling.

6. RISKS AND CONCLUSIONS

OPPORTUNITIES AND RISKS

OPPORTUNITIES

» Flexibility in 3′ cap delta backfill—Use of compliant structural fill (≤120 lbs/cf) may be permitted in lieu of Lightweight Fill (LWF) for the 3′ cap delta zone, subject to final review and approval by the civil engineer. This option may reduce costs and improve sourcing flexibility.

» Potential 3′ cap delta relief from DTSC—If DTSC confirms that the full 3-foot clean buffer is not required in certain areas, or allows alternative mitigation strategies (e.g., isolation layers), the export and import volumes associated with the 3′ cap delta could be reduced, resulting in meaningful cost savings.

» Value engineering of disposal methods—Final landfill and transport procurement may yield lower unit rates than currently assumed in GBI's proposal. Additionally, alternative remediation strategies, such as use of an onsite burrow pit, stockpiling/staging, or phased exports could reduce immediate disposal quantities or defer costs until later project phases.

» Targeted supplemental sampling—Additional borings or step-out validation may reduce hazardous footprint and reclassify borderline zones, especially in cap areas.

» DSM displacement volume may be overstated—Current 35% Area Displacement Ratio (ADR) is conservative; lower values (e.g., 20%) could reduce volume if confirmed.

RISKS

» Overcut beyond modeled zones—Field inspectors may require excavation beyond the modeled contamination limits, increasing off-haul volume and disposal cost.

» Reclassification by DTSC—DTSC or landfill operators may reclassify Class 2 or Class 1 Non-RCRA soils as Class 1 RCRA, increasing hauling restrictions and unit rates.

The risks and opportunities outlined above are subject to further validation through detailed testing, consultant evaluation, regulatory confirmation, and final subcontractor pricing. The methodology used in this report reflects a conservative planning approach based on the best available data. While actual mitigation costs may be reduced through strategic implementation, they may also increase due to the latent and unpredictable nature of subsurface contamination. These risks will not be fully realized until sitework and excavation activities are underway. As such, this report is intended to guide contingency planning, not define final construction scope or costs.

7. SUMMARY

SUMMARY

This report quantifies the anticipated scope, cost, and environmental compliance implications of hazardous soil removal at Mill Valley Middle School. The modeling exercise was initiated in response to updated PEA findings, and represents a conservative planning baseline that reflects:

» A total of 59,225 CY of export volume across all contaminated and impacted areas, including DSM spoils, trench spoils, and a 3' clean cap requirement.

» An estimated construction budget impact of $23.56M, net of DD estimate credits and inclusive of contingency, escalation, and markups.

» Clear identification of soil classifications (Class 1 RCRA, Class 1 Non-RCRA, Class 2 ADC), and associated off-haul strategies.

» Conservative assumptions regarding contamination extent, spoil classification, and buffer requirements in the absence of full field confirmation.

The study provides a defensible foundation for environmental planning and budget alignment. However, final scope will depend on regulatory approvals, additional testing, and decisions by DTSC and the District on mitigation strategies and risk tolerance.

Pending DTSC input and regulatory coordination, this analysis provides a foundation for decision-making related to final scope, mitigation strategy, and funding allocation. FLINT is available to support clarification, revision, or presentation of findings as needed.

8. APPENDICES

APPENDICES

The following supporting documents provide backup data, technical references, and quantity takeoffs that inform the hazardous soil volumetric analysis. These materials support the classification logic, modeling assumptions, and budget impact assessments presented in this report.

Appendix A: FLINT Remediation Cost Estimate (Dated 05/21/25)

Detailed line-item estimate of contaminated soil removal, classification by waste type, associated disposal and site work, and markup applications.

Appendix B: GBI Proposal and Takeoff Package

Subcontractor proposal including modeling approach, removal quantities by phase and waste class, and alignment with FLINT's cost summary.

Appendix C: PEA Sampling Figures and Contamination Extent Modeling

Visual representations of the different interpolation methods tested to define hazardous soil boundaries between confirmed borehole locations.

Appendix D: Ninyo & Moore Bore Hole Test Results

This appendix presents the locations and test results of soil borings collected across the Mill Valley Middle School site. The data included was collected and interpreted as part of the environmental assessment conducted by Ninyo & Moore.

APPENDIX A

FLINT REMEDIATION COST ESTIMATE

HAZARDOUS SOILS COST SUMMARY

	Element	Quantity	Unit	Unit Cost	Total
Added Costs- Per Goodfellow Brothers Estimate, 05-15-25					
	Mobilization				
1.01	GBI Mobilization	1	LS	$85,300.00	$85,300
1.02	Construction Entrance (6 FOD Plates)	1	EA	$35,600.00	$35,600
	Phase 1				
2.01	Wheel Washing / Street Sweeping	1	LS	$142,700.00	$142,700
2.02	Load/Haul/Dispose Class 1 RCRA Stab. (SB-12-10)	90	TN	$643.00	$57,870
2.03	Load/Haul/Dispose Class 1 Non-RCRA	9,450	TN	$218.00	$2,060,100
2.04	Load/Haul/Dispose Class 2 ADC Soil	12,320	TN	$76.00	$936,320
2.05	Sheet Grading Remaining Site Areas	142,160	SF	$0.25	$35,540
	Phase 2				
3.01	Wheel Washing / Street Sweeping	1	LS	$178,000.00	$178,000
3.02	Load/Haul/Dispose Class 1 Non-RCRA	5,870	TN	$218.00	$1,279,660
3.03	Load/Haul/Dispose Class 2 ADC Soil	29,720	TN	$76.00	$2,258,720
3.04	Sheet Grading Remaining Site Areas	298,060	SF	$0.25	$74,515
	Ground Improvements Spoils (Soil Mixing)				
4.01	Wheel Washing / Street Sweeping	1	LS	$307,000.00	$307,000
4.02	Load/Haul/Dispose Class 1 Non-RCRA	36,000	TN	$218.00	$7,848,000
	Underground Spoils (Quantity per FLINT VDC)				
5.01	Wheel Washing / Street Sweeping	1	LS	$20,500.00	$20,500
5.02	Load/Haul/Dispose Class 1 Non-RCRA	772	TN	$218.00	$168,296
5.03	Load/Haul/Dispose Class 2 ADC Soil	438	TN	$76.00	$33,288
	3'-0" Clean Fill Cap				
6.01	Wheel Washing / Street Sweeping	1	LS	$170,700.00	$170,700
6.02	Load/Haul/Dispose Class 1 Non-RCRA	14,200	TN	$218.00	$3,095,600
6.03	Load/Haul/Dispose Class 2 ADC Soil	9,590	TN	$76.00	$728,840
6.04	Import / Replace Clean Fill at 3'-0" Cap	11,895	CY	$175.00	$2,081,625
	Total Haz-Mat Spoils Removal- Added				**$21,598,174**
Credits from FLINT DD Estimate, 11-14-24, Rev.2					
	Interim Housing				
1 .	Mobilization	1	EA	($66,000.00)	($66,000)

HAZARDOUS SOILS COST SUMMARY

	Element	Quantity	Unit	Unit Cost	Total
2 .	Rough grading, cut/fill (per Civil Eng.)	2,813	cy	($13.00)	($36,569)
3 .	Export allowance, other trades spoils	1,500	CY	($90.00)	($135,000)
	Phase 1 Site Mitigation Detail Elements				
4 .	Off-haul spoils for cellcrete	2,813	CY	($90.00)	($253,170)
	Site Improvements				
5 .	Mobilization	1	EA	($66,000.00)	($66,000)
6 .	Rough grading, cut/fill (per Civil Eng.)	15,561	cy	($13.00)	($202,293)
7 .	Export allowance, other trade's spoils	2,000	CY	($90.00)	($180,000)
	Phase 2 Site Mitigation				
8 .	Off-haul spoils for cellcrete	15,270	CY	($90.00)	($1,374,300)
9 .	Off-haul spoils for DSM (per sub)	18,000	CY	($90.00)	($1,620,000)
	Total Haz-Mat Spoils Removal- Credits				**($3,933,332)**
	Subtotal Haz-Mat Spoils Removal				**$17,664,842**
	Contingencies and Mark-ups on Direct Cost of Work				
1 .	SDI / Subcontractor Bonds	1.50%			$264,973
2 .	Design Contingency	4.00%			$717,193
3 .	Escalation to M.O.C. Dec. 2026	9.00%			$1,678,231
4 .	DSA Review Contingency	3.00%			$609,757
5 .	Bonds and Insurance	2.87%			$600,834
6 .	Overhead & Profit Fee	3.50%			$732,725
7 .	Finance Fee Tail, 5.0% Financed	10.00%			$117,823
8 .	Contractor Contingency	5.00%			$1,178,230
	Total Haz-Mat Spoils Removal				**$23,564,608**

APPENDIX B

GBI PROPOSAL AND TAKEOFF PACKAGE

1921 2021

GOODFELLOW BROS.

100 YEARS OF SERVICE

May 21, 2025

ATTN: Flint Builders
401 Derek Place
Roseville 95678
ATTN: Michael Della Rosa

Re: Goodfellow Bros. California, LLC's Proposal – Mill Valley Soil Analysis with Remediation

Mr. Della Rosa

Goodfellow Bros. California, LLC **(GBI)** is pleased to submit to Flint Builders for their consideration and review, this budget proposal to evaluate data for the remediation of Mill Valley Middle School located at 425 Sycamore Ave. Our proposal is based on the following plans and reports:

1. Phase 1 and 2 Civil Plans 100% Design Development Dated 10/4/24
2. Geotechnical Investigation by Ninyo and Moore Dated 8/22/24
3. Preliminary Endangerment Assessment Sampling Location Data

INCLUSIONS

1. Notify the appropriate agencies via Underground Service Alert (USA) and potholing of the work area with GBI personnel to verify the location of existing utilities.
2. Mobilize GBI's personnel and equipment necessary for construction activities.
3. Cost of water, all hook-ups and obtaining temporary hydrant meter from the hydrant located near the site is included in our pricing (No other source of construction water is included in our unit prices). Hauling water from an offsite source is not included.
4. Perform a topographic survey of the site prior to the start of grading activities in order to compare the existing topographic elevations to those provided by the engineer.
5. Pothole the site for existing utilities prior to the start of GBI operations.
6. ***When determining quantities, we identified the location and depth of the contaminated sample, then created a horizontal and vertical volume bound by neighboring samples. In the event similar contamination was discovered in a neighboring sample, the horizontal limits were stopped halfway between the two contaminated samples. The quantities determined here likely can be reduced with additional step out sampling, specific to the contaminant of concern at each boring. It would be prudent to review this opportunity with the Owner, their Environmental Consultant and any regulatory agencies involved.***
7. Load/Haul/Dispose of various contaminated soil.
8. Wheel washing trucks as they leave the site.
9. Leveling site after remediation.
10. Dust control is included for GBI's operations only. Dust control is only when GBI is actively working on the site.

Goodfellow Bros. California, LLC
50 Contractors Street, Livermore, CA 94551
P.O. Box 598, Wenatchee, WA 98807
P 925 \ 245 \ 2100 | F 925 \ 449 \ 5875
CL# 977506 • Equal Opportunity Employer

GOODFELLOWBROS.COM

Furnishing or installing dust palliatives is excluded.

11. Traffic control and clean up for GBI operations only.
12. If a bond is required, please add ½ of one percent to our total contract amount.

EXCLUSIONS

1. All fees, permits, engineering, survey and staking and testing.
2. Additional testing of earthen material to determine actual contamination limits
3. Removal of buried debris, structures, piping, or existing underground utilities is not included unless clearly shown on the plans. Cutting and capping of existing utilities is not included.
4. Modification, relocation, removal or adjustment of existing utilities. Well abandonment or removal.
5. Structural excavation and/or structural backfill.
6. Backfill of existing utility trenches and/or shoring systems.
7. Handling or export of spoils generated by others.
8. Dewatering/Water mitigation.
9. Crushed rock, CL II AB, drain rock, capillary breaks, vapor barrier(s) and/or sand at building pad.
10. Repairs to existing pavement and streets due to construction traffic.
11. Onsite clearing/demolition, underground, concrete, electrical, wall, fence, landscape and irrigation work and any work not listed above or in the attached breakdown.
12. Stockpile management.
13. Any work above the building mat slab.
14. Any police personnel for escort/traffic control.
15. GBI excludes selective grading / handling / processing of soils or over excavation / sub excavation necessary to handle over optimum unsuitable material. Air drying of lime treatment of over optimum materials is not included.
16. Geostabilization fabrics or grids. Rebuilding slopes with geogrid/tensar/wire basket(s) reinforcement. Paving fabrics or grids.
17. Credits for participation any OCIP programs.

CLARIFICATIONS

1. All pricing is in today's dollars. Material, equipment and labor escalation due to when the project may actually start are not included.
2. In the event that government-imposed tariffs, duties, or other regulatory changes impact the cost of materials or services necessary for this project, Goodfellow Bros. California, LLC reserves the right to submit an updated pricing proposal reflecting such changes.
3. We are assuming that our excavation and remedial work extends to design subgrade – our pricing does not include sub excavation of soil or 'chasing waste' beyond these limits. In other words, if a regulatory agency requires further remediation beyond design subgrade, our pricing does not include this scope. Furthermore, any ground improvements or underground work will likely encounter hazardous waste and should be classified accordingly.
4. These assumptions do not warrant, represent or otherwise designate the waste streams to be generated from this project site. The assumptions and visual aids are for informational purposes only – all confirmation sampling, delineation of waste streams and waste designation are the responsibility of the Project Owner, the Generator of the waste, and or the Generator's Designated Representative.
5. The following samples require additional evaluation to determine which waste classification they meet:

- SB-14-5 requires Cadmium TCLP
- DUP-13 - requires Lead TCLP
- DUP-07 requires Chromium STLC, Copper STLC, Lead STLC/TCLP, Nickel STLC
- SB-33-8.5 requires Chromium TCLP and Chromium VI
- DUP-03 requires Chromium STLC
- DUP-12 requires Copper STLC, Mercury STLC, Lead STLC/TCLP
- SB-33-5 requires Lead TCLP
- Stabilization may be required on sample SB-12-10 due to TCLP result of 20 mg/L
- SB-29-5 requires Lead STLC
- SB-31-10 requires Lead STLC/TCLP
- DUP-11 requires Chromium STLC, Lead STLC/TCLP
- SB-36-7 requires Lead TCLP
- SB-40-5 requires Lead STLC/TCLP

6. Our budget assumes acceptance at Republic Services Disposal Facilities. Class 2 material to go to either Keller or Ox Mountain and Class 1 to go to ECDC Landfill.
7. GBI requires 48 hours notice prior to starting any work in order to notify Underground Service Alert (USA). All privately owned utilities will need to be located by others.
8. Clear, unobstructed and continuous access in each phase of work.
9. Working 5 x 8 hour days.
10. Any work requested to be done in bad weather or wet conditions may result in additional costs.
11. There will be no repairs of damage by others at our expense without prior notification to GBI.
12. If the job is operated with any nonunion subcontractors on site, a two gate system may be required.
13. GBI uses standard construction equipment and is not responsible for any damage due to vibrations or any other reason.
14. This proposal is based on utilizing a combination of GPS technology and standard construction staking provided by others. We will require five control points and a complete CAD file.
15. If this proposal is accepted, we will participate in constructing an agreeable schedule.
16. This proposal remains in effect for 30 days.

Goodfellow Bros. California LLC appreciates the opportunity to proposal your project. Please contact me should you have any questions.

Sincerely,
Goodfellow Bros. California LLC

David O'Connell, Ken Fritts and Ivan Eng
Goodfellow Bros. Inc.

05/21/2025 11:48
ITE24-5368-2 Mill Valley MS Remediation v2
*** Ivan Eng

BID TOTALS

Biditem	Description	Quantity	Units	Unit Price	Bid Total
	***Mobilization				
1.01	GBI Mobilization	1.000	LS	85,300.00	85,300.00
1.02	Construction Entrance (6 FOD Plates)	1.000	EA	35,600.00	35,600.00
	***Subtotal Mobilization				$120,900.00
	***Phase 1				
2.01	Wheel Washing/Street Sweeping	1.000	SH	142,700.00	142,700.00
2.02	Load/Haul/Dispose Class 1 RCRA Stabil. (SB-12-10)	90.000	TN	643.00	57,870.00
2.03	Load/Haul/Dipose Class 1 Non-RCRA	9,450.000	TN	218.00	2,060,100.00
2.04	Load/Haul/Dispose Class 2 ADC Soil	12,320.000	TN	76.00	936,320.00
2.05	Sheet Grade Remaining Site Areas	142,160.000	SF	0.25	35,540.00
	***Subtotal Phase 1				$3,232,530.00
	***Phase 2				
3.01	Wheel Washing/Street Sweeping	1.000	LS	178,000.00	178,000.00
3.02	Load/Haul/Dipose Class 1 Non-RCRA	5,870.000	TN	218.00	1,279,660.00
3.03	Load/Haul/Dispose Class 2 ADC Soil	29,720.000	TN	76.00	2,258,720.00
3.04	Sheet Grade Remaining Site Areas	298,060.000	SF	0.25	74,515.00
	***Subtotal Phase 2				$3,790,895.00
	***Ground Improvement Spoils				
4.01	Wheel Washing/Street Sweeping	1.000	LS	307,000.00	307,000.00
4.02	Load/Haul/Dipose Class 1 Non-RCRA	36,000.000	TN	218.00	7,848,000.00
	***Subtotal Ground Improvement Spoils				$8,155,000.00
	***Undergound Spoils				
5.01	Wheel Washing/Street Sweeping	1.000	LS	20,500.00	20,500.00
5.02	Load/Haul/Dipose Class 1 Non-RCRA	1,380.000	TN	218.00	300,840.00
	***Subtotal Underground Spoils				$321,340.00
	***3' Requirement				
6.01	Wheel Washing/Street Sweeping	1.000	LS	170,700.00	170,700.00
6.02	Load/Haul/Dipose Class 1 Non-RCRA	14,200.000	TN	218.00	3,095,600.00
6.03	Load/Haul/Dispose Class 2 ADC Soil	9,590.000	TN	76.00	728,840.00
	***Subtotal 3' Requirement				$3,995,140.00

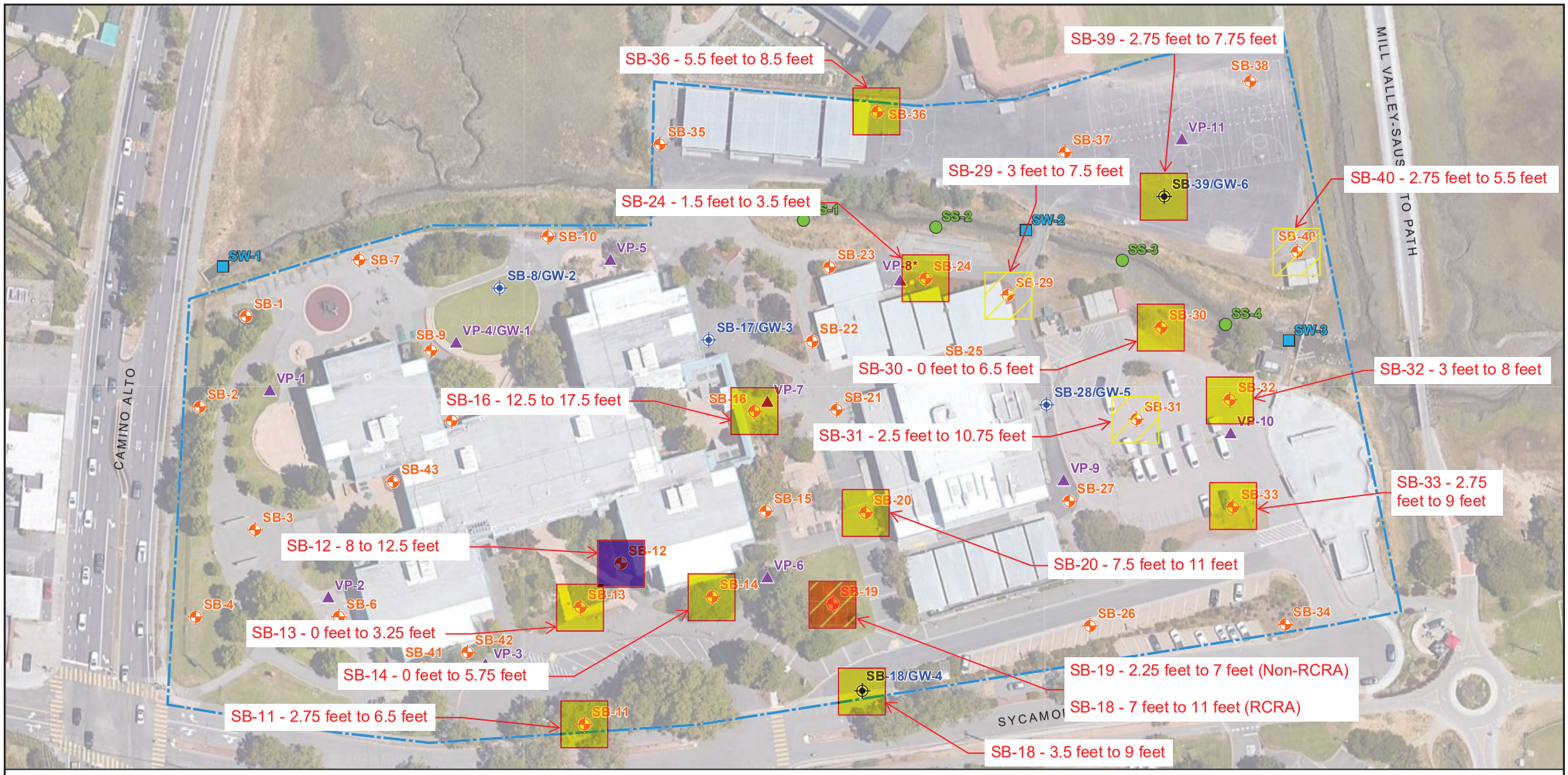
BID TOTALS

Biditem	Description	Quantity	Units	Unit Price	Bid Total
		***Total Base Budget			$19,615,805.00

**Notes:
Items in italics are Non-Additive.

APPENDIX C

PEA SAMPLING FIGURES AND CONTAMINATION EXTENT MODELING



LEGEND

SITE BOUNDARY | SB-1/GW-1 SOIL BORING AND GRAB- GROUNDWATER | SS-4 SURFACE SOIL SAMPLE

SB-2 SOIL BORING | VP-1 SOIL VAPOR PROBE | SW-3 SURFACE WATER SAMPLE

NOTE: DIRECTIONS, DIMENSIONS AND LOCATIONS ARE APPROXIMATE. | SOURCE: GOOGLE, 2025

NOTE:
* = NOT INSTALLED DUE TO SHALLOW GROUNDWATER

N

0 80 160 FEET 80'-0"

P404704001_R.aprx 1/15/2025 JDL

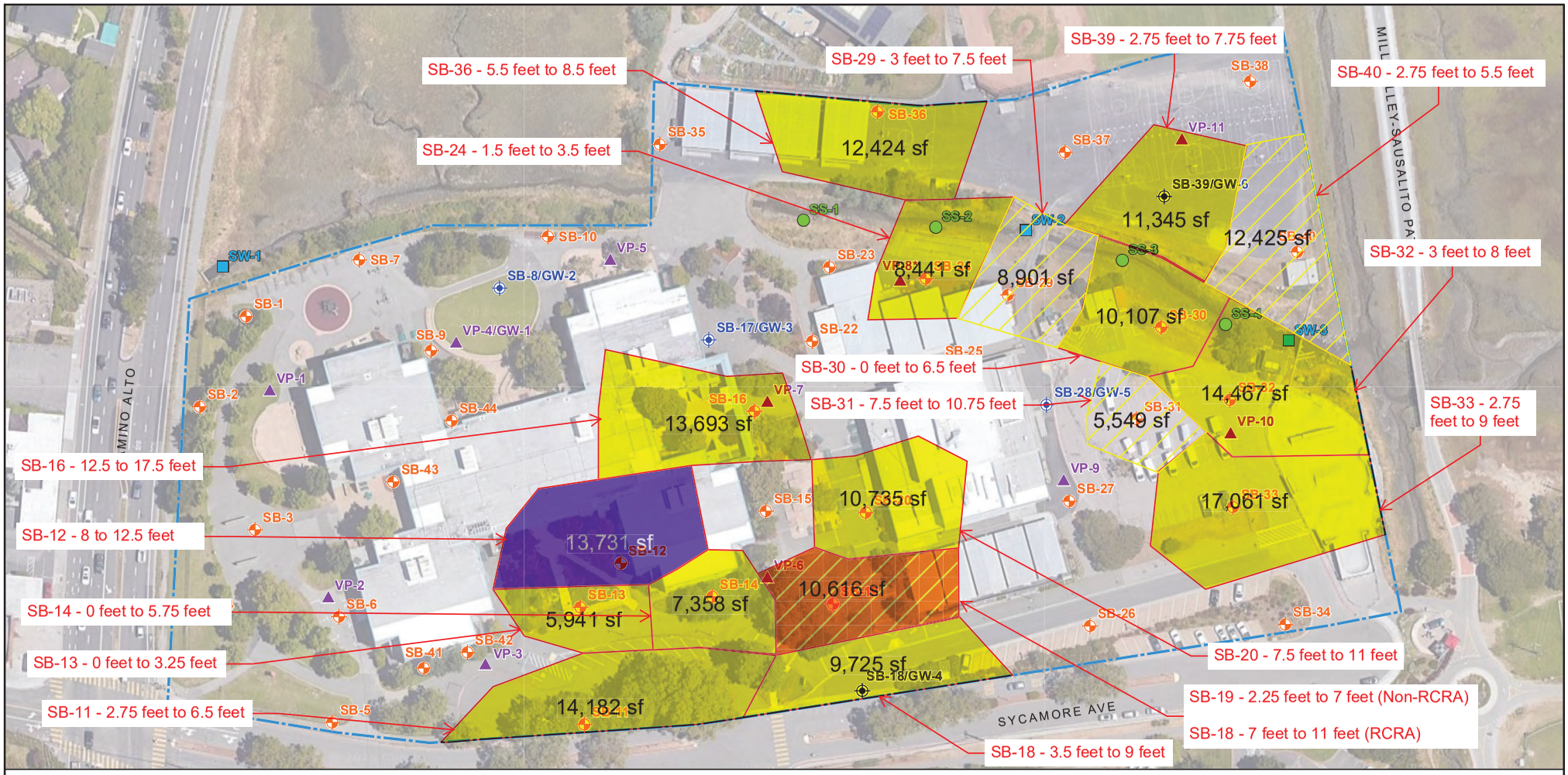
FIGURE 3

PRELIMINARY ENDANGERMENT ASSESSMENT SAMPLING LOCATIONS

MILL VALLEY MIDDLE SCHOOL
425 SYCAMORE AVENUE, MILL VALLEY, CALIFORNIA

404704001 | 1/25

Ninyo & Moore
Geotechnical & Environmental Sciences Consultants



LEGEND

SITE BOUNDARY | SB-1/GW-1 SOIL BORING AND GRAB- GROUNDWATER | SS-4 SURFACE SOIL SAMPLE

SB-2 SOIL BORING | VP-1 SOIL VAPOR PROBE | SW-3 SURFACE WATER SAMPLE

NOTE: DIRECTIONS, DIMENSIONS AND LOCATIONS ARE APPROXIMATE. | SOURCE: GOOGLE, 2025

NOTE:
* = NOT INSTALLED DUE TO SHALLOW GROUNDWATER

N

0 80 160 FEET 80'-0"

P404704001_R.aprx 1/15/2025 JDL

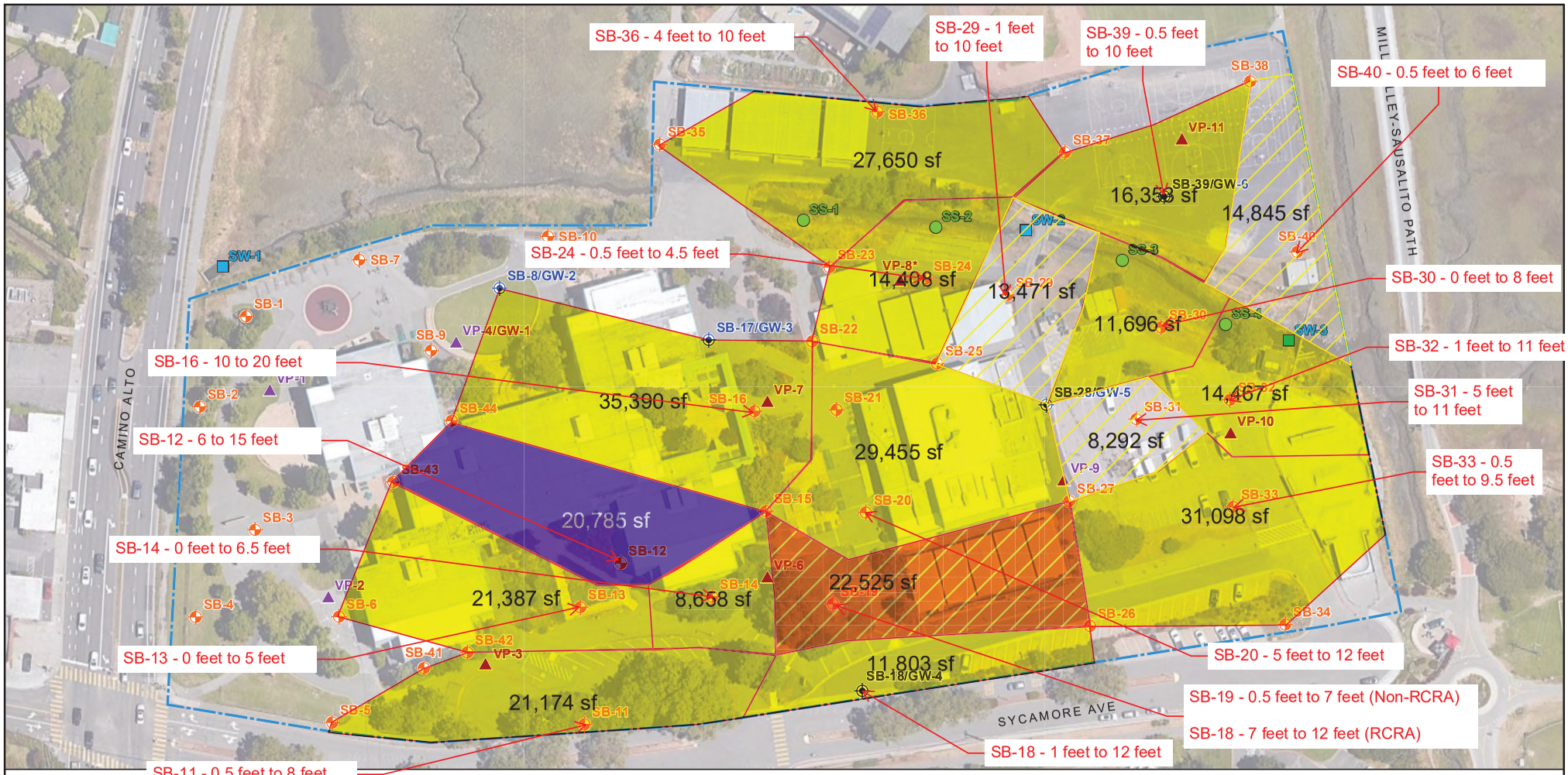
FIGURE 3

PRELIMINARY ENDANGERMENT ASSESSMENT SAMPLING LOCATIONS

MILL VALLEY MIDDLE SCHOOL
425 SYCAMORE AVENUE, MILL VALLEY, CALIFORNIA

404704001 | 1/25

Ninyo & Moore
Geotechnical & Environmental Sciences Consultants



LEGEND

SITE BOUNDARY | SB-1/GW-1 SOIL BORING AND GRAB- GROUNDWATER | SS-4 SURFACE SOIL SAMPLE

SB-2 SOIL BORING | VP-1 SOIL VAPOR PROBE | SW-3 SURFACE WATER SAMPLE

NOTE: DIRECTIONS, DIMENSIONS AND LOCATIONS ARE APPROXIMATE. | SOURCE: GOOGLE, 2025

NOTE:
* = NOT INSTALLED DUE TO SHALLOW GROUNDWATER

N

0 80 160 FEET 80'-0"

P404704001_R.aprx 1/15/2025 JDL

FIGURE 3

PRELIMINARY ENDANGERMENT ASSESSMENT SAMPLING LOCATIONS

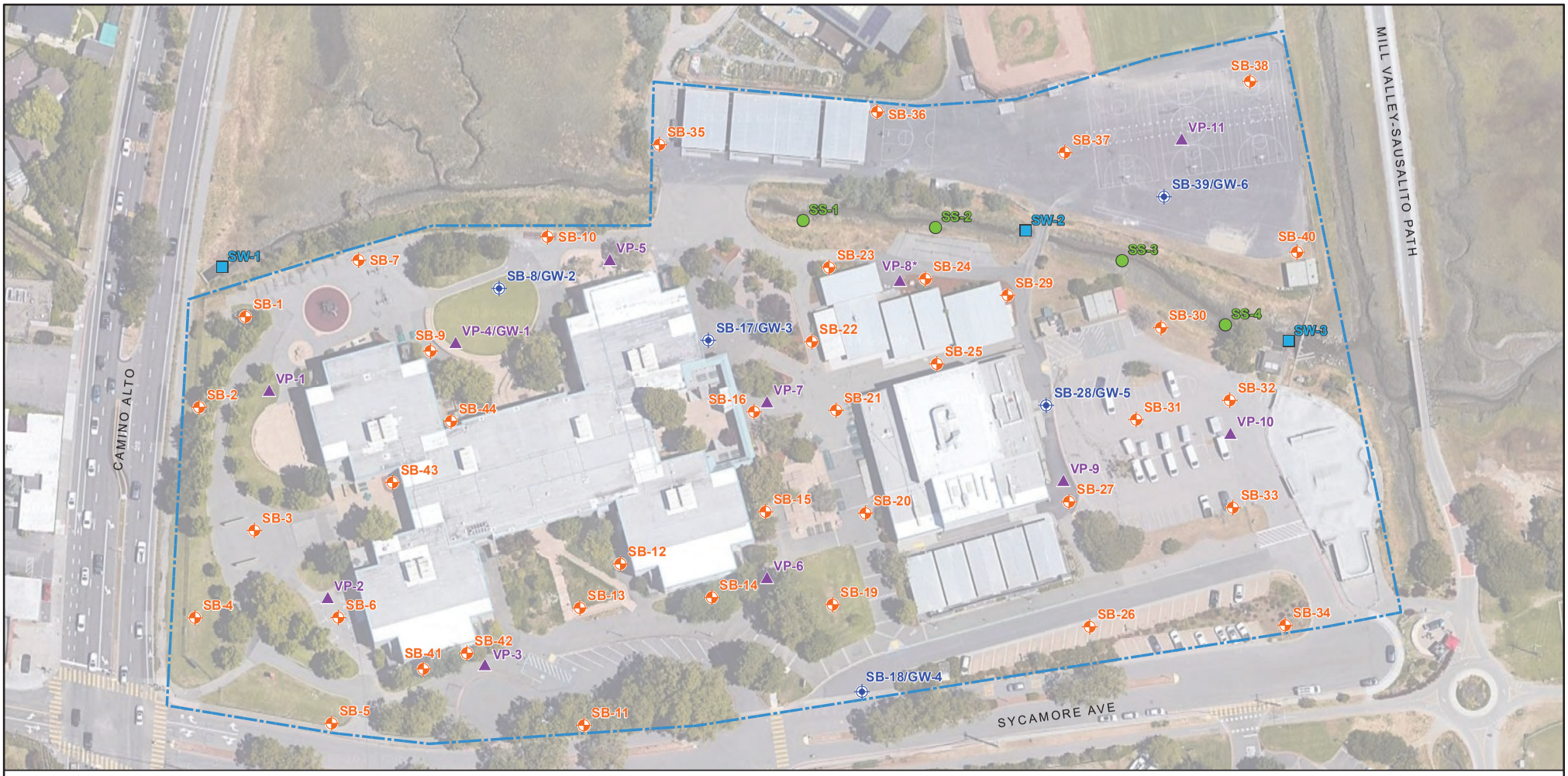
MILL VALLEY MIDDLE SCHOOL
425 SYCAMORE AVENUE, MILL VALLEY, CALIFORNIA

404704001 | 1/25

Ninyo & Moore
Geotechnical & Environmental Sciences Consultants

APPENDIX D

NINYO & MOORE BORE HOLE TEST RESULTS



LEGEND

- SITE BOUNDARY
- SB-1/GW-1 — SOIL BORING AND GRAB- GROUNDWATER
- SS-4 — SURFACE SOIL SAMPLE
- SB-2 — SOIL BORING
- VP-1 — SOIL VAPOR PROBE
- SW-3 — SURFACE WATER SAMPLE

NOTE: DIRECTIONS, DIMENSIONS AND LOCATIONS ARE APPROXIMATE. | SOURCE: GOOGLE, 2025

NOTE:
* = NOT INSTALLED DUE TO SHALLOW GROUNDWATER

N

FEET
0 80 160

P404704001_R.aprx 1/15/2025 JDL

FIGURE 3

PRELIMINARY ENDANGERMENT ASSESSMENT SAMPLING LOCATIONS

MILL VALLEY MIDDLE SCHOOL
425 SYCAMORE AVENUE, MILL VALLEY, CALIFORNIA

404704001 | 1/25

Ninyo & Moore
Geotechnical & Environmental Sciences Consultants

Table 1 – Soil Sample Summary

Sample ID	Sample Depth (ft bgs)	Approximate Elevation (amsl)	Date Sampled	Analyses
SB-1-0.5	0.5	10.0	11/11/2024	Title 22 Metals, STLC (Chromium), pH, TPH, VOCs, PAHs, Dioxins
SB-1-4	4.0	6.5	11/11/2024	Title 22 Metals, TPH, VOCs, PAHs, Dioxins
SB-1-6	6.0	4.5	11/11/2024	Title 22 Metals, TPH, VOCs, PAHs
SB-2-0.5	0.5	13.5	11/11/2024	Title 22 Metals, STLC (Chromium), pH, TPH, VOCs, PAHs
SB-2-5	5.0	9.0	11/11/2024	Title 22 Metals, STLC (Chromium, Nickel), TCLP (Chromium), pH, TPH, VOCs, PAHs
SB-2-10	10.0	4.0	11/11/2024	Title 22 Metals, STLC (Chromium, Nickel), pH, TPH, VOCs, PAHs
SB-2-15	15.0	-1.0	11/11/2024	Title 22 Metals, STLC (Chromium, Nickel), TCLP (Chromium), pH, TPH, VOCs, PAHs
SB-3-1.5	1.5	15.0	11/12/2024	Title 22 Metals, STLC (Chromium), pH, TPH, VOCs, PAHs, Dioxins
SB-3-5	5.0	11.5	11/12/2024	Title 22 Metals, TPH, VOCs, PAHs
SB-3-10	10.0	6.5	11/12/2024	Title 22 Metals, TPH, VOCs, PAHs, Dioxins
SB-3-15	15.0	1.5	11/12/2024	Title 22 Metals, TPH, VOCs, PAHs
DUP-01	15.0	1.5	11/12/2024	Title 22 Metals, TPH, VOCs, PAHs
SB-4-0.5	0.5	16.5	11/12/2024	Title 22 Metals, TPH, VOCs, PAHs
SB-4-5	5.0	12.0	11/12/2024	Title 22 Metals, STLC (Chromium), pH, TPH, VOCs, PAHs
SB-4-10	10.0	7.0	11/12/2024	Title 22 Metals, TPH, VOCs, PAHs
SB-4-15	15.0	2.0	11/12/2024	Title 22 Metals, TPH, VOCs, PAHs
SB-5-0.5	0.5	11.0	11/12/2024	Title 22 Metals, TPH, VOCs, PAHs
SB-5-5	5.0	6.5	11/12/2024	Title 22 Metals, TPH, VOCs, PAHs
SB-5-10	10.0	1.5	11/12/2024	Title 22 Metals, TPH, VOCs, PAHs
DUP-02	10.0	1.5	11/12/2024	Title 22 Metals, TPH, VOCs, PAHs
SB-5-15	15.0	-3.5	11/12/2024	Title 22 Metals, TPH, VOCs, PAHs
SB-6-1.5	1.5	9.5	11/12/2024	Title 22 Metals, STLC (Chromium), TCLP (Chromium), pH, TPH, VOCs, PAHs
SB-6-5	5.0	6.0	11/12/2024	Title 22 Metals, STLC (Chromium), pH, TPH, VOCs, PAHs
SB-6-7	7.0	4.0	11/12/2024	Title 22 Metals, STLC (Chromium, Nickel), TCLP (Chromium), pH, TPH, VOCs, PAHs
SB-6-9.5	9.5	1.5	11/12/2024	Title 22 Metals, TPH, VOCs, PAHs
SB-7-0.5	0.5	10.0	11/11/2024	Title 22 Metals, TPH, VOCs, PAHs
SB-7-5	5.0	5.5	11/11/2024	Title 22 Metals, TPH, VOCs, PAHs
SB-7-7	7.0	3.5	11/11/2024	Title 22 Metals, STLC (Chromium), pH, TPH, VOCs, PAHs
SB-8-0.5	0.5	10.5	11/13/2024	Title 22 Metals, TPH, VOCs, PAHs, Dioxins
SB-8-5	5.0	6.0	11/13/2024	Title 22 Metals, STLC (Chromium), TCLP (Chromium), pH, TPH, VOCs, PAHs
SB-8-9.5	9.5	1.5	11/13/2024	Title 22 Metals, TPH, VOCs, PAHs, Dioxins
SB-8-10.5	10.5	0.5	11/13/2024	Title 22 Metals, STLC (Chromium), pH, TPH, VOCs, PAHs
SB-9-0.5	0.5	11.0	11/13/2024	Title 22 Metals, TPH, VOCs, PAHs
SB-9-6	6.0	5.5	11/13/2024	Title 22 Metals, STLC (Chromium, Lead), TCLP (Lead), pH, TPH, VOCs, PAHs
SB-9-8.5	8.5	3.0	11/13/2024	Title 22 Metals, STLC (Chromium), TCLP (Chromium), pH, TPH, VOCs, PAHs
SB-10-1.5	1.5	9.5	11/13/2024	Title 22 Metals, TPH, VOCs, PAHs
SB-10-2.5	2.5	8.5	11/13/2024	Title 22 Metals, TPH, VOCs, PAHs
DUP-05	2.5	8.5	11/13/2024	Title 22 Metals, TPH, VOCs, PAHs
SB-10-6	6.0	5.0	11/13/2024	Title 22 Metals, TPH, VOCs, PAHs
SB-10-9	9.0	2.0	11/13/2024	Title 22 Metals, STLC (Lead), TCLP (Lead), pH, TPH, VOCs, PAHs
SB-10-10	10.0	1.0	11/13/2024	Title 22 Metals, STLC (Chromium), pH, TPH, VOCs, PAHs
SB-11-0.5	0.5	11.5	11/13/2024	Title 22 Metals, STLC (Chromium, Lead), pH, TPH, VOCs, PAHs
SB-11-5	5.0	7.0	11/13/2024	Title 22 Metals, STLC (Barium), TCLP (Lead), pH, TPH, VOCs, PAHs
SB-11-8	8.0	4.0	11/13/2024	Title 22 Metals, STLC (Lead), pH,TPH, VOCs, PAHs
SB-11-10	10.0	2.0	11/13/2024	Title 22 Metals, TPH, VOCs, PAHs
SB-12-1.5	1.5	10.0	11/14/2024	Title 22 Metals, STLC (Copper), pH, TPH, VOCs, PAHs, OCPs, PCBs
SB-12-2.5	2.5	9.0	11/14/2024	Title 22 Metals, STLC (Lead), pH, TPH, VOCs, PAHs, OCPs, PCBs
SB-12-6	6.0	5.5	11/14/2024	Title 22 Metals, TPH, VOCs, PAHs
SB-12-10	10.0	1.5	11/14/2024	Title 22 Metals, STLC (Arsenic, Chromium), TCLP (Lead), pH, TPH, VOCs, PAHs
SB-12-15	15.0	-3.5	11/14/2024	Title 22 Metals, TPH, VOCs, PAHs
SB-13-1.5	1.5	9.5	11/13/2024	Title 22 Metals, STLC (Arsenic, Chromium, Copper, Mercury), TCLP (Arsenic, Lead), pH, TPH, VOCs, PAHs, Dioxins
SB-13-5	5.0	6.0	11/14/2024	Title 22 Metals, STLC (Lead), pH, TPH, VOCs, PAHs, Dioxins
SB-13-6.5	6.5	4.5	11/14/2024	Title 22 Metals, TPH, VOCs, PAHs
DUP-08	6.5	4.5	11/14/2024	TPHg, VOCs
SB-14-0.5	0.5	11.0	11/13/2024	Title 22 Metals, STLC (Chromium, Lead), TCLP (Lead), pH, TPH, VOCs, PAHs, OCPs, PCBs
SB-14-2.5	2.5	9.0	11/13/2024	Title 22 Metals, STLC (Lead), TCLP (Lead), pH, TPH, VOCs, PAHs, OCPs, PCBs
DUP-07	2.5	9.0	11/13/2024	Title 22 Metals, OCPs, PCBs
SB-14-5	5.0	6.5	11/14/2024	Title 22 Metals, STLC (Antimony, Arsenic, Chromium, Copper), TCLP (Cadmium, Lead), pH, TPH, VOCs, PAHs
SB-14-6.5	6.5	5.0	11/14/2024	Title 22 Metals, TPH, VOCs, PAHs
SB-14-9	9.0	2.5	11/14/2024	Title 22 Metals, STLC (Chromium), pH, TPH, VOCs, PAHs
SB-15-0.5	0.5	10.5	11/14/2024	Title 22 Metals, STLC (Chromium, Lead), pH, TPH, VOCs, PAHs, OCPs,PCBs
SB-15-2.5	2.5	8.5	11/14/2024	Title 22 Metals, OCPs, PCBs
SB-16-0.5	0.5	14.0	11/13/2024	Title 22 Metals, TPH, VOCs, PAHs, Dioxins
SB-16-5	5.0	9.5	11/13/2024	Title 22 Metals, TPH, VOCs, PAHs
DUP-06	5.0	9.5	11/13/2024	Title 22 Metals, TPH, VOCs, PAHs
SB-16-10	10.0	4.5	11/13/2024	Title 22 Metals, TPH, VOCs, PAHs, Dioxins
SB-16-15	15.0	-0.5	11/13/2024	Title 22 Metals, STLC (Arsenic, Chromium, Copper), TCLP (Arsenic, Lead), pH, TPH, VOCs, PAHs
SB-17-0.5	0.5	10.5	11/13/2024	Title 22 Metals, TPH, VOCs, PAHs, OCPs, PCBs
SB-17-2.5	2.5	8.5	11/13/2024	Title 22 Metals, TPH, VOCs, PAHs, OCPs, PCBs
SB-17-7	7.0	4.0	11/13/2024	Title 22 Metals, TPH, VOCs, PAHs, Dioxins, Asbestos
SB-17-10	10.0	1.0	11/13/2024	Title 22 Metals, STLC (Chromium), pH, TPH, VOCs, PAHs
SB-18-1	1.0	9.5	11/14/2024	Title 22 Metals, STLC (Chromium), pH, TPH, VOCs, PAHs, Dioxins
SB-18-6	6.0	4.5	11/14/2024	Title 22 Metals, STLC (Lead), TCLP (Lead), pH, TPH, VOCs, PAHs
SB-18-12	12.0	-1.5	11/14/2024	Title 22 Metals, STLC (Chromium), pH, TPH, VOCs, PAHs, Dioxins
SB-18-16	16.0	-5.5	11/14/2024	Title 22 Metals, TPH, VOCs, PAHs
SB-19-0.5	0.5	12.0	11/14/2024	Title 22 Metals, STLC (Lead), pH, TPH, VOCs, PAHs
SB-19-4	4.0	8.5	11/14/2024	Title 22 Metals, STLC (Chromium, Copper, Mercury), TCLP (Lead), TPH, VOCs, PAHs
SB-19-10	10.0	2.5	11/14/2024	Title 22 Metals, STLC (Barium, Chromium, Copper), TCLP (Barium, Lead), pH, TPH, VOCs, PAHs
SB-19-12	12.0	0.5	11/14/2024	Title 22 Metals, STLC (Chromium), pH, TPH, VOCs, PAHs
SB-20-1	1.0	10.5	11/14/2024	Title 22 Metals, TPH, VOCs, PAHs, Dioxins
SB-20-5	5.0	6.5	11/14/2024	Title 22 Metals, TPH, VOCs, PAHs, Dioxins
SB-20-10	10.0	1.5	11/14/2024	Title 22 Metals, STLC (Lead, Mercury), TCLP (Lead), TPH, PAHs
SB-20-12	12.0	-0.5	11/14/2024	Title 22 Metals, STLC (Chromium), pH, TPH, VOCs, PAHs

Table 1 – Soil Sample Summary

Sample ID	Sample Depth (ft bgs)	Approximate Elevation (amsl)	Date Sampled	Analyses
SB-21-0.5	0.5	11.0	11/14/2024	Title 22 Metals, TPH, VOCs, PAHs
DUP-09	0.5	11.0	11/14/2024	Title 22 Metals, TPH, VOCs, PAHs
SB-21-5	5.0	6.5	11/14/2024	Title 22 Metals, TPH, VOCs, PAHs
SB-21-10	10.0	1.5	11/14/2024	Title 22 Metals, STLC (Lead), pH, TPH, VOCs, PAHs
SB-21-15	15.0	-3.5	11/14/2024	Title 22 Metals, STLC (Chromium), pH, TPH, VOCs, PAHs
SB-22-1	1.0	10.5	11/13/2024	Title 22 Metals, TPH, VOCs, PAHs, OCPs, PCBs
SB-22-2.5	2.5	9.0	11/13/2024	Title 22 Metals, STLC (Lead), TCLP (Lead), pH, OCPs, PCBs
SB-22-5	5.0	6.5	11/13/2024	Title 22 Metals, TPH, VOCs, PAHs
SB-22-10	10.0	1.5	11/13/2024	Title 22 Metals, STLC (Lead), TCLP (Lead), pH, TPH, PAHs, Dioxins, Asbestos
SB-22-13	13.0	-1.5	11/13/2024	Title 22 Metals, STLC (Chromium), pH, TPH, VOCs, PAHs
SB-23-0.5	0.5	8.5	11/13/2024	Title 22 Metals, STLC (Lead), pH, TPH, VOCs, PAHs, Dioxins
SB-23-2.5	2.5	6.5	11/13/2024	Title 22 Metals, STLC (Lead), pH, OCPs, PCBs, Dioxins
SB-23-10	10.0	-1.0	11/13/2024	Title 22 Metals, STLC (Chromium), pH, TPH, VOCs, PAHs
SB-24-0.5	0.5	8.5	11/15/2024	Title 22 Metals, STLC (Lead), pH, TPH, VOCs, PAHs, OCPs, PCBs
SB-24-2.5	2.5	6.5	11/15/2024	Title 22 Metals, STLC (Chromium, Copper, Lead, Mercury), TCLP (Lead), pH, OCPs, PCBs
DUP-12	2.5	6.5	11/15/2024	Title 22 Metals, OCPs, PCBs
SB-24-7	7.0	2.0	11/15/2024	Title 22 Metals, STLC (Lead), pH, TPH, VOCs, PAHs
SB-24-9.5	9.5	-0.5	11/15/2024	Title 22 Metals, TPH, VOCs, PAHs
SB-24.10.5	10.5	-1.5	11/15/2024	Title 22 Metals, TPH, VOCs, PAHs
SB-25-0.5	0.5	11.0	11/14/2024	Title 22 Metals, TPH, VOCs, PAHs, OCPs, PCBs, Dioxins
SB-25-2.5	2.5	9.0	11/14/2024	OCPs, PCBs
SB-25-5	5.0	6.5	11/14/2024	Title 22 Metals, TPH, VOCs, PAHs
SB-25-10	10.0	1.5	11/14/2024	Title 22 Metals, STLC (Lead, Mercury), pH, TPH, VOCs, PAHs, Dioxins
SB-25-12	12.0	-0.5	11/14/2024	Title 22 Metals, TPH, VOCs, PAHs
SB-26-0.5	0.5	8.0	11/14/2024	Title 22 Metals, TPH, VOCs, PAHs
SB-26-2	2.0	6.5	11/14/2024	Title 22 Metals, TPH, VOCs, PAHs
DUP-10	2.0	6.5	11/14/2024	Title 22 Metals, TPH, VOCs, PAHs
SB-26-5	5.0	3.5	11/14/2024	Title 22 Metals, STLC (Chromium, Lead), TCLP (Lead), TPH, VOCs, PAHs
SB-26-7	7.0	1.5	11/14/2024	Title 22 Metals, STLC (Chromium, Lead), pH, TPH, VOCs, PAHs
SB-27-1	1.0	9.5	11/14/2024	Title 22 Metals, STLC (Chromium), pH, TPH, VOCs, PAHs, OCPs, PCBs
SB-27-2.5	2.5	8.0	11/14/2024	Title 22 Metals, OCPs, PCBs
SB-27-5	5.0	5.5	11/14/2024	Title 22 Metals, TPH, VOCs, PAHs
SB-27-12	12.0	-1.5	11/14/2024	Title 22 Metals, STLC (Chromium), pH, TPH, VOCs, PAHs
SB-27-14	14.0	-3.5	11/14/2024	Title 22 Metals, STLC (Chromium), pH, TPH, VOCs, PAHs
SB-28-0.5	0.5	10.0	11/15/2024	Title 22 Metals, TPH, VOCs, PAHs, Dioxins
SB-28-5	5.0	5.5	11/15/2024	Title 22 Metals, TPH, VOCs, PAHs, Dioxins
SB-28-10	10.0	0.5	11/15/2024	Title 22 Metals, STLC (Chromium), pH, TPH, VOCs, PAHs
SB-28-14	14.0	-3.5	11/15/2024	Title 22 Metals, STLC (Chromium), pH, TPH, VOCs, PAHs
SB-29-1	1.0	8.0	11/15/2024	Title 22 Metals, STLC (Lead), pH, TPH, VOCs, PAHs
SB-29-2.5	2.5	6.5	11/15/2024	OCPs, PCBs
SB-29-5	5.0	4.0	11/15/2024	Title 22 Metals, TCLP (Lead), pH, TPH, VOCs, PAHs
SB-29-10	10.0	-1.0	11/15/2024	Title 22 Metals, STLC (Lead), pH, TPH, VOCs, PAHs
SB-29-12	12.0	-3.0	11/15/2024	Title 22 Metals, STLC (Chromium), pH, TPH, VOCs, PAHs
SB-30-0.5	0.5	8.0	11/15/2024	Title 22 Metals, STLC (Chromium, Lead), pH, TPH, VOCs, PAHs
DUP-14	0.5	8.0	11/15/2024	Title 22 Metals, TPH, VOCs, PAHs
SB-30-5	5.0	3.5	11/16/2024	Title 22 Metals, STLC (Chromium, Copper, Lead), TCLP (Lead), pH, TPH, VOCs, PAHs
SB-30-8	8.0	0.5	11/16/2024	Title 22 Metals, STLC (Chromium), pH, TPH, VOCs, PAHs
SB-31-1.5	1.5	8.0	11/15/2024	Title 22 Metals, TPH, VOCs, PAHs
SB-31-5	5.0	4.5	11/15/2024	Title 22 Metals, STLC (Barium), pH, TPH, VOCs, PAHs
SB-31-10	10.0	-0.5	11/15/2024	Title 22 Metals, TPH, VOCs, PAHs, Asbestos
SB-31-11.5	11.5	-2.0	11/15/2024	Title 22 Metals, STLC (Chromium), pH, TPH, VOCs, PAHs
SB-32-1	1.0	7.0	11/15/2024	Title 22 Metals, TPH, VOCs, PAHs
SB-32-5	5.0	3.0	11/15/2024	Title 22 Metals, STLC (Chromium, Copper, Lead, Zinc), pH, TCLP (Lead), TPH, VOCs, PAHs
SB-32-11	11.0	-3.0	11/15/2024	Title 22 Metals, STLC (Chromium, Lead), TCLP (Lead), pH, TPH, VOCs, PAHs
DUP-11	11.0	-3.0	11/15/2024	Title 22 Metals, TPH, VOCs, PAHs
SB-32-13	13.0	-5.0	11/15/2024	Title 22 Metals, STLC (Chromium), pH, TPH, VOCs, PAHs
SB-33-0.5	0.5	7.5	11/14/2024	Title 22 Metals, STLC (Chromium), pH, TPH, VOCs, PAHs, Dioxins
SB-33-5	5.0	3.0	11/14/2024	Title 22 Metals, TPH, VOCs, PAHs
SB-33-8.5	8.5	-0.5	11/14/2024	Title 22 Metals, STLC (Chromium, Lead, Nickel, Zinc), TPH, VOCs, PAHs, Dioxins
SB-33-9.5	9.5	-1.5	11/14/2024	Title 22 Metals, TPH, VOCs, PAHs
SB-34-0.5	0.5	6.5	11/14/2024	Title 22 Metals, STLC (Lead), pH, TPH, VOCs, PAHs, Dioxins
SB-34-1.5	1.5	5.5	11/14/2024	Title 22 Metals, STLC (Chromium, Lead), pH, TPH, VOCs, PAHs
SB-34-4	4.0	3.0	11/14/2024	Title 22 Metals, STLC (Chromium, Lead, Nickel), TCLP (Chromium, Lead), pH, TPH, VOCs, PAHs, Dioxins
SB-34-5.5	5.5	1.5	11/14/2024	Title 22 Metals, STLC (Chromium), pH, TPH, VOCs, PAHs
SB-35-1	1.0	8.0	11/15/2024	Title 22 Metals, TPH, VOCs, PAHs
SB-35-6	6.0	3.0	11/15/2024	Title 22 Metals, TPH, VOCs, PAHs
SB-35-10	10.0	-1.0	11/15/2024	Title 22 Metals, STLC (Lead), TCLP (Lead), pH, TPH, VOCs, PAHs
SB-36-1.5	1.5	8.5	11/15/2024	Title 22 Metals, TPH, VOCs, PAHs, Dioxins
SB-36-4	4.0	6.0	11/15/2024	Title 22 Metals, TPH, VOCs, PAHs
SB-36-7	7.0	3.0	11/15/2024	Title 22 Metals, STLC (Lead), TPH, VOCs, PAHs, Dioxins
SB-36-10	10.0	0.0	11/15/2024	Title 22 Metals, TPH, VOCs, PAHs
SB-37-0.5	0.5	9.0	11/15/2024	Title 22 Metals, STLC (Mercury), TCLP (Mercury), pH, TPH, VOCs, PAHs
SB-37-5	5.0	4.5	11/15/2024	Title 22 Metals, STLC (Lead), TCLP (Lead), pH, TPH, VOCs, PAHs
SB-37-10	10.0	-0.5	11/15/2024	Title 22 Metals, STLC (Lead, Mercury), TCLP (Mercury), pH, TPH, VOCs, PAHs
SB-37-12	12.0	-2.5	11/15/2024	Title 22 Metals, STLC (Chromium), pH, TPH, VOCs, PAHs
SB-38-1	1.0	7.5	11/15/2024	Title 22 Metals, TPH, VOCs, PAHs
SB-38-5	5.0	3.5	11/15/2024	Title 22 Metals, STLC (Chromium), pH, TPH, VOCs, PAHs
SB-38-10	10.0	-1.5	11/15/2024	Title 22 Metals, STLC (Lead), TCLP (Lead), pH, TPH, VOCs, PAHs
SB-38-12	12.0	-3.5	11/15/2024	Title 22 Metals, STLC (Chromium), pH, TPH, VOCs, PAHs
SB-39-0.5	0.5	8.0	11/15/2024	Title 22 Metals, TPH, VOCs, PAHs, Dioxins
SB-39-5	5.0	3.5	11/15/2024	Title 22 Metals, TCLP (Arsenic, Lead), TPH, VOCs, PAHs
DUP-13	5.0	3.5	11/15/2024	Title 22 Metals, TPH, VOCs, PAHs
SB-39-10	10.0	-1.5	11/15/2024	Ttile 22 Metals, TPH, VOCs, PAHs, Dioxins

Table 1 – Soil Sample Summary

Sample ID	Sample Depth (ft bgs)	Approximate Elevation (amsl)	Date Sampled	Analyses
SB-40-0.5	0.5	7.0	11/15/2024	Title 22 Metals, STLC (Chromium, Lead), pH, TPH, VOCs, PAHs, Dioxins
SB-40-5	5.0	2.5	11/15/2024	Title 22 Metals, TPH, VOCs, PAHs, Dioxins
SB-40-6	6.0	1.5	11/15/2024	Title 22 Metals, STLC (Chromium), pH, TPH, VOCs, PAHs
SB-41-0.5	0.5	11.0	11/12/2024	Title 22 Metals, OCPs, PCBs, Dioxins
SB-41-2.5	2.5	9.0	11/12/2024	Title 22 Metals, OCPs, PCBs, Dioxins
SB-42-0.5	0.5	11.0	11/12/2024	Title 22 Metals, STLC (Chromium), pH, OCPs, PCBs
SB-42-2.5	2.5	9.0	11/12/2024	Title 22 Metals, OCPs, PCBs
DUP-03	2.5	9.0	11/12/2024	Title 22 Metals, OCPs, PCBs
SB-43-0.5	0.5	18.0	11/12/2024	Title 22 Metals, OCPs, PCBs, Dioxins
SB-43-2.5	2.5	16.0	11/12/2024	Title 22 Metals, OCPs, PCBs, Dioxins
SB-44-0.5	0.5	11.0	11/12/2024	OCPs, PCBs, Dioxins
SB-44-2	2.0	9.5	11/12/2024	OCPs, PCBs, Dioxins
VP-4-9	9.0	4.0	11/12/2024	Title 22 Metals, TPH, VOCs, PAHs, Dioxins
SS-1	0-0.5	4.5	11/15/2024	Title 22 Metals, STLC (Lead), pH, TPH, VOCs, PAHs, Dioxins, Asbestos
SS-2	0-0.5	4.5	11/15/2024	Title 22 Metals, TPH, VOCs, PAHs, Dioxins, Asbestos
SS-3	0-0.5	4.5	11/15/2024	Title 22 Metals, TPH, VOCs, PAHs, Dioxins, Asbestos
SS-4	0-0.5	4.5	11/15/2024	Title 22 Metals, STLC (Lead), pH, TPH, VOCs, PAHs, Dioxins, Asbestos

Notes:

TPH = Total Petroleum Hydrocarbons (as gasoline, diesel, motor oil)

OCPs = Organochlorine pesticides

STLC = Soluable Threshold Limit Concentration

TCLP = Toxicity Characteristic Leaching Procedure

PAHs = Polycyclic Aromatic Hydrocarbons

PCBs = Polychlorinated Biphenyls

VOCs = Volatile Organic Compounds

amsl = above mean sea level

ft bgs = feet below ground surface

Table 2 – Soil Analytical Results: Title 22 Metals and pH

Sample ID	Sample Depth (ft bgs)	Date Sampled	Antimony	Antimony (STLC)[1]	Arsenic	Arsenic (STLC)[1]	Arsenic (TCLP)[1]	Barium	Barium (STLC)[1]	Barium (TCLP)[1]	Beryllium	Cadmium	Cadmium (STLC)[1]	Chromium	Chromium (STLC)[1]	Chromium (TCLP)[1]	Cobalt	Copper	Copper (STLC)[1]	Lead	Lead (STLC)[1]	Lead (TCLP)[1]	Nickel	Nickel (STLC)[1]	Mercury	Mercury (STLC)[1]	Mercury (TCLP)[1]	Molybdenum	Selenium	Silver	Thallium	Vanadium	Zinc	Zinc (STLC)[1]	pH
			mg/kg																																SU
SB-1-0.5	0.5	11/11/2024	<2.9	--	**11**	--	--	180	--	--	0.58	<0.49	--	**76**	<0.30	--	18	39	--	35	--	--	93	--	0.20	--	--	<0.98	<2.9	<0.49	<2.9	46	95	--	6.57
SB-1-4	5.0	11/11/2024	<2.9	--	5.3	--	--	200	--	--	0.58	<0.48	--	**49**	--	--	14	23	--	10	--	--	53	--	<0.15	--	--	<0.95	<2.9	<0.48	<2.9	43	47	--	--
SB-1-6	6.0	11/11/2024	<2.9	--	5.0	--	--	110	--	--	<0.48	<0.48	--	**39**	--	--	13	18	--	6.5	--	--	40	--	0.34	--	--	1.3	<2.9	<0.48	<2.9	35	22	--	--
SB-2-0.5	0.5	11/11/2024	<2.9	--	**11**	--	--	190	--	--	0.60	<0.49	--	**53**	<0.30	--	17	36	--	27	--	--	77	--	<0.15	--	--	<0.98	<2.9	<0.49	<2.9	42	83	--	6.86
SB-2-5	5.0	11/11/2024	4.3	--	6.2	--	--	40	--	--	0.71	<0.50	--	**270**	<0.30	<0.030	**23**	38	--	3.5	--	--	390	0.70	0.64	--	--	<0.99	<3.0	<0.50	<3.0	61	28	--	6.15
SB-2-10	10.0	11/11/2024	<2.9	--	4.9	--	--	45	--	--	0.96	<0.49	--	**63**	<0.30	--	**49**	60	--	9.3	--	--	490	2.8	0.71	--	--	<0.98	<2.9	<0.49	<2.9	44	92	--	6.45
SB-2-15	15.0	11/11/2024	4.0	--	3.7	--	--	53	--	--	0.69	<0.50	--	**280**	<0.30	<0.030	**34**	35	--	6.0	--	--	490	1.3	0.48	--	--	<0.99	<3.0	<0.50	<3.0	60	50	--	8.29
SB-3-1.5	1.5	11/12/2024	3.4	--	10	--	--	230	--	--	0.67	<0.50	--	**58**	<0.30	--	17	37	--	12	--	--	88	--	<0.15	--	--	<0.99	<3.0	<0.50	<3.0	41	59	--	7.76
SB-3-5	5.0	11/12/2024	3.1	--	**15**	--	--	180	--	--	0.69	<0.50	--	**22**	--	--	15	42	--	16	--	--	41	--	<0.14	--	--	<1.0	<3.0	<0.50	<3.0	26	75	--	--
SB-3-10	10.0	11/12/2024	<3.0	--	6.8	--	--	190	--	--	0.68	<0.50	--	**36**	--	--	4.3	31	--	6.3	--	--	60	--	0.65	--	--	<0.99	<3.0	<0.50	<3.0	40	38	--	--
SB-3-15	15.0	11/12/2024	<2.9	--	8.8	--	--	790	--	--	0.77	0.60	--	**26**	--	--	**82**	40	--	13	--	--	110	--	0.37	--	--	1.5	<2.9	<0.49	<0.97	35	58	--	--
DUP-01	15.0	11/12/2024	<2.9	--	10	--	--	250	--	--	0.87	<0.48	--	**31**	--	--	**38**	52	--	14	--	--	73	--	0.41	--	--	1.0	<2.9	<0.48	<2.9	40	67	--	--
SB-4-0.5	0.5	11/12/2024	<2.9	--	8.9	--	--	190	--	--	0.62	<0.48	--	**39**	--	--	15	37	--	33	--	--	59	--	0.16	--	--	<0.96	<2.9	<0.48	<2.9	37	84	--	--
SB-4-5	5.0	11/12/2024	<2.9	--	**13**	--	--	220	--	--	0.76	<0.48	--	**63**	<0.30	--	19	48	--	26	--	--	93	--	0.16	--	--	<0.96	<2.9	<0.48	<2.9	51	81	--	8.17
SB-4-10	10.0	11/12/2024	<2.9	--	4.7	--	--	160	--	--	0.58	<0.49	--	**29**	--	--	7.1	21	--	10	--	--	37	--	0.19	--	--	<0.97	<2.9	<0.49	<2.9	40	35	--	--
SB-4-15	15.0	11/12/2024	<2.9	--	7.8	--	--	200	--	--	0.62	<0.49	--	**26**	--	--	22	32	--	12	--	--	45	--	0.19	--	--	<0.97	<2.9	<0.49	<2.9	34	67	--	--
SB-5-0.5	0.5	11/12/2024	<2.9	--	9.3	--	--	190	--	--	0.58	<0.48	--	**46**	--	--	16	43	--	37	--	--	68	--	0.17	--	--	<0.96	<2.9	<0.48	<2.9	39	98	--	--
SB-5-5	5.0	11/12/2024	<3.0	--	**12**	--	--	540	--	--	0.66	<0.50	--	**23**	--	--	**26**	38	--	13	--	--	78	--	0.20	--	--	<0.99	<3.0	<0.50	<3.0	37	110	--	--
SB-5-10	10.0	11/12/2024	<2.9	--	**22**	--	--	930	--	--	0.63	<0.49	--	**34**	--	--	**24**	40	--	13	--	--	66	--	0.29	--	--	6.6	<2.9	<0.49	<2.9	40	83	--	--
DUP-02	10.0	11/12/2024	<2.9	--	**31**	--	--	310	--	--	0.62	<0.48	--	**33**	--	--	21	37	--	13	--	--	74	--	0.49	--	--	3.3	<2.9	<0.48	<2.9	40	85	--	--
SB-5-15	15.0	11/12/2024	<2.9	--	8.1	--	--	390	--	--	0.75	<0.49	--	**26**	--	--	16	59	--	20	--	--	53	--	<0.15	--	--	1.1	<2.9	<0.49	<2.9	32	93	--	--
SB-6-1.5	1.5	11/12/2024	<2.9	--	1.1	--	--	310	--	--	<0.48	<0.48	--	**180**	<0.30	<0.030	**35**	59	--	1.8	--	--	110	--	0.98	--	--	<0.96	<2.9	<0.48	<2.9	190	50	--	7.69
SB-6-5	5.0	11/12/2024	<2.9	--	4.5	--	--	200	--	--	0.57	<0.48	--	**67**	<0.30	--	18	28	--	8.5	--	--	120	--	0.98	--	--	<0.95	<2.9	<0.48	<2.9	63	48	--	7.95
SB-6-7	7.0	11/12/2024	3.3	--	8.8	--	--	98	--	--	0.97	<0.49	--	**160**	<0.30	<0.030	**27**	53	--	9.0	--	--	340	<0.60	0.52	--	--	1.3	<2.9	<0.49	<2.9	54	80	--	7.51
SB-6-9.5	9.5	11/12/2024	<2.9	--	5.9	--	--	44	--	--	0.49	<0.48	--	**45**	--	--	14	28	--	7.5	--	--	69	--	0.83	--	--	<0.95	<2.9	<0.48	<2.9	56	59	--	--
SB-7-0.5	0.5	11/11/2024	<2.9	--	4.4	--	--	850	--	--	<0.49	<0.49	--	**26**	--	--	11	23	--	24	--	--	39	--	0.26	--	--	<0.97	<2.9	<0.49	<2.9	41	50	--	--
SB-7-5	5.0	11/11/2024	<3.0	--	5.6	--	--	220	--	--	0.58	<0.50	--	**33**	--	--	11	29	--	9.6	--	--	42	--	<0.16	--	--	<1.0	<3.0	<0.50	<3.0	42	54	--	--
SB-7-7	7.0	11/11/2024	<2.9	--	5.5	--	--	46	--	--	<0.49	<0.49	--	**55**	<0.30	--	7.4	21	--	7.7	--	--	55	--	<0.16	--	--	<0.97	<2.9	<0.49	<2.9	42	43	--	7.87
SB-8-0.5	0.5	11/13/2024	<2.9	--	**27**	--	--	190	--	--	0.64	<0.49	--	**35**	--	--	16	45	--	37	--	--	52	--	0.15	--	--	<0.98	<2.9	<0.49	<2.9	36	100	--	--
SB-8-5	5.0	11/13/2024	3.1	--	**11**	--	--	200	--	--	0.66	<0.48	--	**130**	<0.30	<0.030	19	42	--	21	--	--	130	--	<0.17	--	--	<0.95	<2.9	<0.48	<2.9	42	72	--	7.77
SB-8-9.5	9.5	11/13/2024	<2.9	--	**18**	--	--	130	--	--	0.60	<0.49	--	**27**	--	--	9.3	30	--	12	--	--	29	--	<0.16	--	--	<0.98	<2.9	<0.49	<2.9	35	46	--	--
SB-8-10.5	10.5	11/13/2024	<3.0	--	6.0	--	--	54	--	--	<0.50	<0.50	--	**55**	<0.30	--	6.0	22	--	16	--	--	53	--	<0.14	--	--	1.6	<3.0	<0.50	<3.0	43	43	--	7.23
SB-9-0.5	0.5	11/13/2024	<2.9	--	3.9	--	--	140	--	--	<0.49	<0.49	--	**33**	--	--	15	27	--	11	--	--	44	--	0.74	--	--	<0.97	<2.9	<0.49	<2.9	51	47	--	--
SB-9-6	6.0	11/13/2024	<3.0	--	6.8	--	--	270	--	--	<0.50	0.86	--	**58**	<0.30	--	11	91	--	**310**	3.2	1.0	63	--	0.21	--	--	1.2	<3.0	<0.50	<3.0	50	470	--	7.55
SB-9-8.5	8.5	11/13/2024	<2.9	--	4.9	--	--	270	--	--	0.50	<0.48	--	**120**	0.41	<0.030	18	25	--	8.7	--	--	150	--	<0.14	--	--	<0.95	<2.9	<0.48	<2.9	50	41	--	7.73
SB-10-1.5	1.5	11/13/2024	<3.0	--	4.4	--	--	110	--	--	<0.50	<0.50	--	**31**	--	--	9.6	21	--	20	--	--	44	--	0.32	--	--	<0.99	<3.0	<0.50	<3.0	33	49	--	--
SB-10-2.5	2.5	11/13/2024	<2.9	--	9.6	--	--	220	--	--	0.65	<0.48	--	**39**	--	--	15	45	--	43	--	--	55	--	**1.5**	--	--	<0.96	<2.9	<0.48	<2.9	40	92	--	--
DUP-05	2.5	11/13/2024	<3.0	--	6.5	--	--	150	--	--	<0.50	<0.50	--	**25**	--	--	9.9	28	--	40	--	--	35	--	0.18	--	--	<1.0	<3.0	<0.50	<3.0	25	52	--	--
SB-10-6	6.0	11/13/2024	<2.9	--	9.6	--	--	180	--	--	0.68	<0.49	--	**25**	--	--	13	37	--	13	--	--	39	--	<0.15	--	--	<0.98	<2.9	<0.49	<2.9	34	62	--	--
SB-10-9	9.0	11/13/2024	<2.9	--	6.0	--	--	360	--	--	0.58	<0.48	--	**46**	--	--	13	75	--	**150**	0.18	0.037	60	--	<0.16	--	--	<0.96	<2.9	<0.48	<2.9	48	240	--	7.70
SB-10-10	10.0	11/13/2024	<2.9	--	4.5	--	--	34	--	--	<0.48	<0.48	--	**59**	<0.30	--	7.8	19	--	5.5	--	--	58	--	<0.15	--	--	<0.96	<2.9	<0.48	<2.9	46	47	--	7.60
SB-11-0.5	0.5	11/13/2024	<2.9	--	7.6	--	--	140	--	--	<0.48	<0.48	--	**56**	<0.30	--	13	68	--	**98**	1.6	--	67	--	0.24	--	--	<0.96	<2.9	<0.48	<2.9	39	1,600	--	6.38
SB-11-5	5.0	11/13/2024	<3.0	--	**17**	--	--	1,300	1.7	--	1.1	3.9	--	**46**	--	--	11	230	--	**4,800**	--	0.35	58	--	0.54	--	--	1.4	<3.0	1.4	<3.0	60	1,500	--	7.71
SB-11-8	8.0	11/13/2024	<3.0	--	5.9	--	--	210	--	--	0.69	<0.50	--	**45**	--	--	7.8	27	--	71	0.36	--	40	--	0.29	--	--	<0.99	<3.0	<0.50	<3.0	42	69	--	7.81
SB-11-10	10.0	11/13/2024	<3.0	--	2.2	--	--	190	--	--	0.75	<0.50	--	**23**	--	--	21	18	--	7.8	--	--	28	--	<0.15	--	--	<0.99	<3.0	<0.50	<3.0	52	20	--	--

Table 2 – Soil Analytical Results: Title 22 Metals and pH

Sample ID	Sample Depth (ft bgs)	Date Sampled	Antimony	Antimony (STLC)[1]	Arsenic	Arsenic (STLC)[1]	Arsenic (TCLP)[1]	Barium	Barium (STLC)[1]	Barium (TCLP)[1]	Beryllium	Cadmium	Cadmium (STLC)[1]	Chromium	Chromium (STLC)[1]	Chromium (TCLP)[1]	Cobalt	Copper	Copper (STLC)[1]	Lead	Lead (STLC)[1]	Lead (TCLP)[1]	Nickel	Nickel (STLC)[1]	Mercury	Mercury (STLC)[1]	Mercury (TCLP)[1]	Molybdenum	Selenium	Silver	Thallium	Vanadium	Zinc	Zinc (STLC)[1]	pH
			mg/kg																																SU
SB-12-1.5	1.5	11/14/2024	<2.9	--	4.2	--	--	150	--	--	<0.49	<0.49	--	**26**	--	--	11	980	0.69	40	--	--	40	--	0.54	--	--	<0.97	<2.9	<0.49	<2.9	51	91	--	8.74
SB-12-2.5	2.5	11/14/2024	<2.9	--	5.8	--	--	210	--	--	<0.49	<0.49	--	**30**	--	--	13	95	--	72	0.53	--	42	--	0.32	--	--	1.0	<2.9	<0.49	<2.9	70	140	--	8.53
SB-12-6	6.0	11/14/2024	<2.9	--	<0.98	--	--	11	--	--	<0.49	<0.49	--	**4.8**	--	--	<0.49	6.5	--	23	--	--	3.8	--	<0.15	--	--	<0.98	<2.9	<0.49	<2.9	10	26	--	--
SB-12-10	10.0	11/14/2024	5.3	--	**67**	<0.30	--	290	--	--	0.48	7.0	--	**52**	<0.30	--	14	190	--	**23,000**	--	20	60	--	0.65	--	--	2.1	<2.9	<0.49	<2.9	28	2,300	--	8.73
SB-12-15	15.0	11/14/2024	<2.9	--	3.7	--	--	120	--	--	0.49	<0.49	--	**26**	--	--	5.2	16	--	26	--	--	34	--	0.24	--	--	<0.97	<2.9	<0.49	<2.9	30	35	--	--
SB-13-1.5	1.5	11/13/2024	27	--	**110**	<0.30	<0.030	360	--	--	<0.49	4.5	--	**94**	<0.30	--	**23**	510	0.52	**4,500**	--	0.53	120	--	**2.2**	<0.010	--	17	<2.9	3.0	<2.9	10	2,000	--	7.69
SB-13-5	5.0	11/14/2024	<2.9	--	6.3	--	--	240	--	--	0.57	<0.48	--	**49**	--	--	11	56	--	68	1.1	--	46	--	0.25	--	--	<0.96	<2.9	<0.48	<2.9	39	100	--	7.22
SB-13-6.5	6.5	11/14/2024	<3.0	--	8.1	--	--	360	--	--	0.73	<0.50	--	**45**	--	--	13	28	--	10	--	--	57	--	<0.15	--	--	<0.99	<3.0	<0.50	<3.0	51	41	--	--
SB-14-0.5	0.5	11/13/2024	<2.9	--	7.7	--	--	180	--	--	0.48	0.78	--	**67**	<0.30	--	17	65	--	**120**	0.62	0.065	83	--	**1.7**	--	--	<0.96	<2.9	21	<2.9	47	190	--	6.93
SB-14-2.5	2.5	11/13/2024	<2.9	--	9.9	--	--	250	--	--	0.51	2.2	--	**38**	--	--	15	110	--	**310**	1.0	0.18	58	--	0.41	--	--	1.3	<2.9	<0.48	<2.9	41	220	--	7.67
DUP-07	2.5	11/13/2024	<3.0	--	**16**	--	--	350	--	--	0.58	1.3	--	**77**	--	--	20	1,400	--	**490**	--	--	270	--	0.90	--	--	1.7	<3.0	3.0	<3.0	47	850	--	--
SB-14-5	5.0	11/14/2024	**290**	<0.90	**63**	<0.30	--	540	--	--	<0.49	**180**	0.026	**80**	<0.30	--	15	440	1.3	**17,000**	--	0.054	120	--	0.64	--	--	29	<2.9	1.7	<2.9	5.0	1,100	--	10.52
SB-14-6.5	6.5	11/14/2024	<2.9	--	1.2	--	--	10	--	--	<0.48	<0.48	--	**6.8**	--	--	0.86	5.5	--	18	--	--	8.4	--	<0.15	--	--	<0.96	<2.9	<0.48	<2.9	11	13	--	--
SB-14-9	9.0	11/14/2024	<2.9	--	9.7	--	--	38	--	--	<0.49	0.55	--	**54**	<0.30	--	8.5	27	--	24	--	--	59	--	0.20	--	--	1.5	<2.9	<0.49	<2.9	44	99	--	9.36
SB-15-0.5	0.5	11/14/2024	<2.9	--	8.3	--	--	180	--	--	0.52	<0.49	--	**53**	<0.30	--	12	94	--	74	0.53	--	56	--	0.22	--	--	<0.97	<2.9	<0.49	<2.9	38	150	--	6.52
SB-15-2.5	2.5	11/14/2024	<2.9	--	**12**	--	--	210	--	--	0.73	<0.49	--	**22**	--	--	15	44	--	19	--	--	43	--	<0.15	--	--	<0.97	<2.9	<0.49	<2.9	31	84	--	--
SB-16-0.5	0.5	11/13/2024	<2.9	--	6.2	--	--	150	--	--	<0.49	<0.49	--	**28**	--	--	15	31	--	13	--	--	50	--	0.16	--	--	<0.97	<2.9	<0.49	<2.9	53	53	--	--
SB-16-5	5.0	11/13/2024	3.3	--	**24**	--	--	190	--	--	0.68	<0.49	--	**30**	--	--	15	46	--	15	--	--	47	--	<0.16	--	--	<0.97	<2.9	<0.49	<2.9	31	73	--	--
DUP-06	5.0	11/13/2024	4.6	--	**14**	--	--	280	--	--	0.85	<0.50	--	**30**	--	--	20	53	--	19	--	--	62	--	<0.15	--	--	1.1	<3.0	<0.50	<3.0	35	87	--	--
SB-16-10	10.0	11/13/2024	3.2	--	**17**	--	--	200	--	--	0.72	<0.50	--	**18**	--	--	14	47	--	14	--	--	37	--	<0.14	--	--	<0.99	<3.0	<0.50	<3.0	26	73	--	--
SB-16-15	15.0	11/13/2024	10	--	**230**	<0.30	<0.030	130	--	--	<0.49	2.0	--	**77**	<0.30	--	**41**	290	<0.30	**1,600**	--	<0.015	78	--	<0.14	--	--	15	9.8	<0.49	<2.9	6.0	250	--	7.48
SB-17-0.5	0.5	11/13/2024	<2.9	--	2.7	--	--	92	--	--	<0.49	<0.49	--	**21**	--	--	8.2	13	--	9.0	--	--	39	--	0.53	--	--	<0.98	<2.9	<0.49	<2.9	33	31	--	--
SB-17-2.5	2.5	11/13/2024	<3.0	--	9.2	--	--	470	--	--	0.66	<0.50	--	**31**	--	--	15	41	--	15	--	--	46	--	<0.16	--	--	<0.99	<3.0	<0.50	<3.0	37	71	--	--
SB-17-7	7.0	11/13/2024	<2.9	--	2.8	--	--	28	--	--	<0.48	<0.48	--	**47**	--	--	5.3	14	--	10	--	--	43	--	<0.15	--	--	2.5	<2.9	<0.48	<2.9	38	40	--	--
SB-17-10	10.0	11/13/2024	<3.0	--	3.9	--	--	30	--	--	<0.50	<0.50	--	**58**	<0.30	--	7.6	18	--	5.0	--	--	54	--	<0.15	--	--	<1.0	<3.0	<0.50	<3.0	44	42	--	7.99
SB-18-1	1.0	11/14/2024	<3.0	--	6.6	--	--	130	--	--	0.60	<0.50	--	**77**	<0.30	--	19	47	--	44	-	--	88	--	<0.15	--	--	<0.99	<3.0	<0.50	<3.0	58	83	--	8.10
SB-18-6	6.0	11/14/2024	<3.0	--	**22**	--	--	140	--	--	<0.50	0.99	--	**35**	--	--	5.9	180	--	**190**	<0.15	0.16	22	--	0.69	--	--	3.5	<3.0	<0.50	<3.0	8.1	**5,600**	--	12.45
SB-18-12	12.0	11/14/2024	<2.9	--	**13**	--	--	85	--	--	0.50	<0.49	--	**81**	<0.30	--	11	28	--	42	--	--	65	--	<0.15	--	--	1.3	<2.9	<0.49	<2.9	62	170	--	8.20
SB-18-16	16.0	11/14/2024	<3.0	--	10	--	--	110	--	--	0.61	<0.50	--	**45**	--	--	12	22	--	9.3	--	--	57	--	<0.14	--	--	1.6	<3.0	<0.50	<3.0	47	41	--	--
SB-19-0.5	0.5	11/14/2024	<3.0	--	10	--	--	220	--	--	0.63	<0.50	--	**45**	--	--	16	70	--	69	0.24	--	66	--	0.27	--	--	<0.99	<3.0	<0.50	<3.0	41	150	--	6.84
SB-19-4	4.0	11/14/2024	<3.0	--	**19**	--	--	810	--	--	0.65	2.6	--	**52**	<0.30	--	12	290	5.4	**1,600**	--	0.031	51	--	**2.6**	<0.010	--	2.4	<3.0	1.3	<3.0	36	1,200	--	--
SB-19-10	10.0	11/14/2024	7.9	--	**44**	--	--	4,900	1.4	<1.0	<0.50	4.9	--	**76**	<0.30	--	**26**	290	<0.30	**2,100**	--	**5.7**	110	--	0.61	--	--	14	<3.0	0.80	<3.0	17	**9,600**	--	7.21
SB-19-12	12.0	11/14/2024	<2.9	--	5.8	--	--	34	--	--	<0.49	<0.49	--	**53**	<0.30	--	7.6	24	--	18	--	--	57	--	<0.16	--	--	<0.98	<2.9	<0.49	<2.9	40	52	--	7.83
SB-20-1	1.0	11/14/2024	<3.0	--	5.2	--	--	180	--	--	<0.50	<0.50	--	**36**	--	--	12	25	--	31	--	--	53	--	0.24	--	--	<0.99	<3.0	<0.50	<3.0	45	66	--	--
SB-20-5	5.0	11/14/2024	<3.0	--	**11**	--	--	250	--	--	0.68	<0.50	--	**22**	--	--	14	43	--	14	--	--	34	--	<0.17	--	--	<1.0	<3.0	<0.50	<3.0	31	65	--	--
SB-20-10	10.0	11/14/2024	<2.9	--	**39**	--	--	190	--	--	<0.49	0.87	--	**43**	--	--	12	**6,400**	--	**250**	1.1	0.20	35	--	**3.1**	<0.010	--	4.2	<2.9	1.2	<2.9	15	240	--	--
SB-20-12	12.0	11/14/2024	<2.9	--	4.0	--	--	33	--	--	<0.49	<0.49	--	**54**	<0.30	--	7.0	19	--	6.0	--	--	51	--	<0.16	--	--	<0.98	<2.9	<0.49	<2.9	43	42	--	7.63
SB-21-0.5	0.5	11/14/2024	<2.9	--	3.4	--	--	120	--	--	<0.49	<0.49	--	**12**	--	--	6.3	11	--	10	--	--	23	--	0.98	--	--	<0.98	<2.9	<0.49	<2.9	24	34	--	--
DUP-09	0.5	11/14/2024	<2.9	--	4.0	--	--	200	--	--	0.65	<0.49	--	**21**	--	--	8.8	17	--	12	--	--	35	--	**1.1**	--	--	<0.97	<2.9	<0.49	<2.9	33	44	--	--
SB-21-5	5.0	11/14/2024	<2.9	--	**11**	--	--	180	--	--	0.66	<0.48	--	**18**	--	--	16	40	--	12	--	--	37	--	<0.16	--	--	<0.95	<2.9	<0.48	<2.9	24	63	--	--
SB-21-10	10.0	11/14/2024	<3.0	--	8.2	--	--	180	--	--	<0.50	4.3	--	**30**	--	--	15	56	--	**99**	0.65	--	34	--	0.87	--	--	1.2	<3.0	<0.50	<3.0	52	170	--	8.25
SB-21-15	15.0	11/14/2024	<2.9	--	4.5	--	--	32	--	--	<0.49	<0.49	--	**54**	<0.30	--	7.1	16	--	7.0	--	--	52	--	<0.17	--	--	1.9	<2.9	<0.49	<2.9	44	48	--	7.97
SB-22-1	1.0	11/13/2024	<3.0	--	3.4	--	--	110	--	--	<0.50	<0.50	--	**34**	--	--	8.8	13	--	12	--	--	39	--	0.64	--	--	<0.99	<3.0	<0.50	<3.0	26	34	--	--
SB-22-2.5	2.5	11/13/2024	<2.9	--	**22**	--	--	240	--	--	0.59	0.76	--	**39**	--	--	16	81	--	**170**	2.0	0.13	54	--	0.58	--	--	1.3	<2.9	<0.48	<2.9	33	170	--	8.15
SB-22-5	5.0	11/13/2024	<2.9	--	**11**	--	--	190	--	--	0.63	<0.49	--	**22**	--	--	16	39	--	16	--	--	42	--	<0.14	--	--	<0.97	<2.9	<0.49	<2.9	28	70	--	--

Table 2 – Soil Analytical Results: Title 22 Metals and pH

Sample ID	Sample Depth (ft bgs)	Date Sampled	Antimony	Antimony (STLC)[1]	Arsenic	Arsenic (STLC)[1]	Arsenic (TCLP)[1]	Barium	Barium (STLC)[1]	Barium (TCLP)[1]	Beryllium	Cadmium	Cadmium (STLC)[1]	Chromium	Chromium (STLC)[1]	Chromium (TCLP)[1]	Cobalt	Copper	Copper (STLC)[1]	Lead	Lead (STLC)[1]	Lead (TCLP)[1]	Nickel	Nickel (STLC)[1]	Mercury	Mercury (STLC)[1]	Mercury (TCLP)[1]	Molybdenum	Selenium	Silver	Thallium	Vanadium	Zinc	Zinc (STLC)[1]	pH
			mg/kg																																SU
SB-22-10	10.0	11/13/2024	<3.0	--	9.9	--	--	180	--	--	<0.50	1.7	--	**30**	--	--	13	79	--	**110**	0.59	<0.015	40	--	<0.14	--	--	2.5	<3.0	<0.50	<3.0	45	150	--	7.64
SB-22-13	13.0	11/13/2024	<3.0	--	3.7	--	--	29	--	--	<0.50	<0.50	--	**55**	<0.30	--	5.9	15	--	3.7	--	--	47	--	<0.15	--	--	2.8	<3.0	<0.50	<3.0	44	38	--	8.39
SB-23-0.5	0.5	11/13/2024	<3.0	--	8.6	--	--	220	--	--	0.55	<0.50	--	**35**	--	--	12	52	--	75	0.30	--	49	--	0.53	--	--	<1.0	<3.0	<0.50	<3.0	36	280	--	7.67
SB-23-2.5	2.5	11/13/2024	<2.9	--	**11**	--	--	180	--	--	0.57	0.79	--	**36**	--	--	17	52	--	68	0.74	--	56	--	0.17	--	--	1..2	<2.9	<0.49	<2.9	38	320	--	7.56
SB-23-10	10.0	11/13/2024	<2.9	--	3.5	--	--	28	--	--	<0.48	<0.48	--	**56**	<0.30	--	7.3	19	--	4.7	--	--	54	--	<0.15	--	--	<0.95	<2.9	<0.48	<2.9	41	41	--	8.37
SB-24-0.5	0.5	11/15/2024	<3.0	--	9.3	--	--	200	--	--	0.61	<0.50	--	**48**	--	--	14	64	--	**110**	0.38	--	63	--	0.60	--	--	1.3	<3.0	<0.50	<3.0	39	400	--	7.79
SB-24-2.5	2.5	11/15/2024	5.5	--	**29**	--	--	370	--	--	<0.50	3.2	--	**62**	<0.30	--	15	280	2.4	**750**	**5.5**	0.11	71	--	**3.8**	<0.010	--	6.8	<3.0	1.1	<3.0	30	880	--	7.45
DUP-12	2.5	11/15/2024	<2.9	--	**17**	--	--	350	--	--	<0.49	2.2	--	**52**	--	--	13	290	--	**640**	--	--	61	--	**3.2**	--	--	3.7	<2.9	1.2	<2.9	30	640	--	--
SB-24-7	7.0	11/15/2024	<3.0	--	4.8	--	--	150	--	--	<0.50	<0.50	--	**22**	--	--	7.2	20	--	60	0.56	--	28	--	<0.16	--	--	<1.0	<3.0	<0.50	<3.0	27	84	--	7.48
SB-24-9.5	9.5	11/15/2024	**59**	--	**11**	--	--	400	--	--	<0.50	2.0	--	**44**	--	--	14	66	--	**180**	--	--	60	--	0.16	--	--	4.3	<3.0	<0.50	<3.0	23	520	--	--
SB-24.10.5	10.5	11/15/2024	<2.9	--	5.4	--	--	26	--	--	<0.48	<0.48	--	**47**	--	--	4.7	13	--	4.5	--	--	43	--	<0.16	--	--	3.1	<2.9	<0.48	<2.9	38	35	--	--
SB-25-0.5	0.5	11/14/2024	<2.9	--	3.9	--	--	140	--	--	<0.48	<0.48	--	**25**	--	--	7.1	21	--	11	--	--	35	--	0.35	--	--	<0.95	<2.9	<0.48	<2.9	39	47	--	--
SB-25-5	5.0	11/14/2024	<2.9	--	**13**	--	--	150	--	--	0.65	<0.49	--	**22**	--	--	14	32	--	13	--	--	34	--	<0.15	--	--	0.98	<2.9	<0.49	<2.9	30	66	--	--
SB-25-10	10.0	11/14/2024	<2.9	--	**13**	--	--	270	--	--	<0.49	0.79	--	**35**	--	--	12	58	--	**140**	2.5	--	49	--	**2.3**	<0.010	--	3.3	<2.9	<0.49	<2.9	38	310	--	7.23
SB-25-12	12.0	11/14/2024	<3.0	--	4.1	--	--	29	--	--	<0.50	<0.50	--	**49**	--	--	5.4	12	--	4.4	--	--	41	--	<0.17	--	--	1.9	<3.0	<0.50	<3.0	41	36	--	--
SB-26-0.5	0.5	11/14/2024	<3.0	--	7.1	--	--	170	--	--	0.57	<0.50	--	**19**	--	--	13	25	--	16	--	--	29	--	<0.17	--	--	<1.0	<3.0	<0.50	<3.0	28	48	--	--
SB-26-2	2.0	11/14/2024	<2.9	--	8.1	--	--	210	--	--	0.68	<0.49	--	**29**	--	--	16	42	--	24	--	--	43	--	<0.17	--	--	<0.97	<2.9	<0.49	<2.9	36	84	--	--
DUP-10	2.0	11/14/2024	<2.9	--	6.8	--	--	210	--	--	0.59	<0.48	--	**23**	--	--	11	35	--	11	--	--	36	--	<0.17	--	--	<0.95	<2.9	<0.48	<2.9	34	68	--	--
SB-26-5	5.0	11/14/2024	<2.9	--	**13**	--	--	270	--	--	<0.48	1.1	--	**56**	<0.30	--	13	110	--	**300**	4.2	0.13	74	--	**1.5**	--	--	1.3	<2.9	<0.48	<2.9	38	410	--	--
SB-26-7	7.0	11/14/2024	<2.9	--	6.0	--	--	170	--	--	<0.48	<0.48	--	**74**	<0.30	--	10	100	--	78	0.61	--	78	--	<0.15	--	--	<0.95	<2.9	<0.48	<2.9	36	200	--	6.56
SB-27-1	1.0	11/14/2024	<3.0	--	9.1	--	--	200	--	--	0.62	<0.50	--	**51**	<0.30	--	15	39	--	17	--	--	75	--	<0.15	--	--	<0.99	<3.0	<0.50	<3.0	41	66	--	7.91
SB-27-2.5	2.5	11/14/2024	<2.9	--	5.0	--	--	210	--	--	0.71	<0.48	--	**34**	--	--	14	24	--	8.4	--	--	51	--	<0.16	--	--	<0.96	<2.9	<0.48	<2.9	46	61	--	--
SB-27-5	5.0	11/14/2024	<2.9	--	8.4	--	--	200	--	--	0.63	<0.48	--	**21**	--	--	11	30	--	15	--	--	28	--	<0.16	--	--	<0.95	<2.9	<0.48	<2.9	30	55	--	--
SB-27-12	12.0	11/14/2024	<2.9	--	**29**	--	--	66	--	--	<0.48	<0.48	--	**60**	<0.30	--	11	36	--	31	--	--	65	--	0.16	--	--	2.8	<2.9	<0.48	<2.9	42	100	--	8.19
SB-27-14	14.0	11/14/2024	<2.9	--	4.0	--	--	29	--	--	<0.49	<0.49	--	**54**	<0.30	--	7.1	17	--	5.6	--	--	53	--	<0.16	--	--	<0.97	<2.9	<0.49	<2.9	39	42	--	7.85
SB-28-0.5	0.5	11/15/2024	<2.9	--	8.4	--	--	200	--	--	0.64	<0.48	--	**26**	--	--	5.8	40	--	13	--	--	24	--	0.15	--	--	<0.96	<2.9	<0.48	<2.9	46	50	--	--
SB-28-5	5.0	11/15/2024	<2.9	--	**11**	--	--	200	--	--	0.64	<0.49	--	**18**	--	--	16	36	--	14	--	--	35	--	<0.14	--	--	<0.97	<2.9	<0.49	<2.9	26	67	--	--
SB-28-10	10.0	11/15/2024	<2.9	--	6.0	--	--	84	--	--	<0.48	<0.48	--	**58**	<0.30	--	5.3	21	--	19	--	--	55	--	<0.14	--	--	2.1	<2.9	<0.48	<2.9	41	62	--	8.08
SB-28-14	14.0	11/15/2024	<2.9	--	4.2	--	--	32	--	--	<0.48	<0.48	--	**59**	<0.30	--	7.5	19	--	5.8	--	--	57	--	<0.16	--	--	1.0	<2.9	<0.48	<2.9	44	46	--	8.09
SB-29-1	1.0	11/15/2024	<2.9	--	5.8	--	--	240	--	--	0.64	<0.48	--	**39**	--	--	11	43	--	51	0.69	--	40	--	0.35	--	--	<0.95	<2.9	<0.48	<2.9	44	82	--	7.51
SB-29-5	5.0	11/15/2024	<2.9	--	**14**	--	--	180	--	--	<0.48	0.89	--	**38**	--	--	9.2	160	--	**270**	--	0.12	48	--	0.76	--	--	2.6	<2.9	<0.48	<2.9	23	310	--	7.80
SB-29-10	10.0	11/15/2024	<2.9	--	4.0	--	--	130	--	--	<0.48	0.88	--	**25**	--	--	6.9	39	--	61	0.55	--	48	--	0.24	--	--	1.0	<2.9	<0.48	<2.9	44	310	--	7.98
SB-29-12	12.0	11/15/2024	<3.0	--	2.6	--	--	25	--	--	<0.50	<0.50	--	**51**	<0.30	--	5.8	14	--	5.1	--	--	47	--	<0.16	--	--	1.2	<3.0	<0.50	<3.0	38	39	--	8.13
SB-30-0.5	0.5	11/15/2024	<2.9	--	7.1	--	--	170	--	--	0.55	<0.49	--	**55**	<0.30	--	15	37	--	57	0.21	--	69	--	0.21	--	--	<0.97	<2.9	<0.49	<2.9	37	120	--	6.37
DUP-14	0.5	11/15/2024	<3.0	--	6.9	--	--	160	--	--	<0.50	<0.50	--	**45**	--	--	12	37	--	48	--	--	57	--	0.27	--	--	<1.0	<3.0	<0.50	<3.0	34	99	--	--
SB-30-5	5.0	11/16/2024	<2.9	--	**19**	--	--	550	--	--	<0.49	2.2	--	**57**	<0.30	--	13	280	**41**	**480**	2.0	0.69	75	--	<0.17	--	--	1.9	<2.9	0.57	<2.9	36	1,100	--	7.15
SB-30-8	8.0	11/16/2024	<2.9	--	4.4	--	--	31	--	--	<0.48	<0.48	--	**57**	<0.30	--	7.6	19	--	5.4	--	--	55	--	<0.16	--	--	<0.95	<2.9	<0.48	<2.9	42	42	--	8.13
SB-31-1.5	1.5	11/15/2024	<3.0	--	**11**	--	--	180	--	--	0.70	<0.50	--	**20**	--	--	14	38	--	14	--	--	37	--	<0.17	--	--	<1.0	<3.0	<0.50	<3.0	28	68	--	--
SB-31-5	5.0	11/15/2024	<3.0	--	**11**	--	--	1,300	16	--	0.67	<0.50	--	**23**	--	--	15	130	--	26	--	--	30	--	<0.15	--	--	<0.99	7.3	0.73	**16**	76	33	--	7.28
SB-31-10	10.0	11/15/2024	<0.29	--	**21**	--	--	160	--	--	<0.49	3.2	--	**30**	--	--	7.1	63	--	**360**	--	--	43	--	0.23	--	--	5.3	<2.9	<0.49	<2.9	15	480	--	--
SB-31-11.5	11.5	11/15/2024	<2.9	--	3.2	--	--	32	--	--	<0.48	<0.48	--	**59**	<0.30	--	6.8	18	--	9.0	--	--	59	--	<0.14	--	--	<0.96	<2.9	<0.48	<2.9	40	41	--	8.04
SB-32-1	1.0	11/15/2024	<3.0	--	5.5	--	--	150	--	--	0.61	<0.50	--	**28**	--	--	8.6	24	--	19	--	--	34	--	0.29	--	--	<1.0	<3.0	<0.50	<3.0	26	57	--	--
SB-32-5	5.0	11/15/2024	<2.9	--	**14**	--	--	740	--	--	<0.49	2.6	--	**51**	<0.30	--	7.9	340	<0.30	**770**	**12**	0.030	46	--	0.27	--	--	2.8	<2.9	0.50	<2.9	23	4,200	33	7.95
SB-32-11	11.0	11/15/2024	<2.9	--	**19**	--	--	200	--	--	<0.49	1.3	--	**57**	<0.30	--	9.7	110	--	**270**	0.27	<0.015	70	--	0.19	--	--	5.4	<2.9	1.6	<2.9	33	870	--	7.86
DUP-11	11.0	11/15/2024	<2.9	--	6.0	--	--	57	--	--	<0.48	<0.48	--	**50**	--	--	7.0	34	--	**160**	--	--	50	--	0.18	--	--	<0.95	<2.9	<0.48	<2.9	38	180	--	--

Table 2 – Soil Analytical Results: Title 22 Metals and pH

Sample ID	Sample Depth (ft bgs)	Date Sampled	Antimony	Antimony (STLC)[1]	Arsenic	Arsenic (STLC)[1]	Arsenic (TCLP)[1]	Barium	Barium (STLC)[1]	Barium (TCLP)[1]	Beryllium	Cadmium	Cadmium (STLC)[1]	Chromium	Chromium (STLC)[1]	Chromium (TCLP)[1]	Cobalt	Copper	Copper (STLC)[1]	Lead	Lead (STLC)[1]	Lead (TCLP)[1]	Nickel	Nickel (STLC)[1]	Mercury	Mercury (STLC)[1]	Mercury (TCLP)[1]	Molybdenum	Selenium	Silver	Thallium	Vanadium	Zinc	Zinc (STLC)[1]	pH
			mg/kg																																SU
SB-32-13	13.0	11/15/2024	<3.0	--	3.7	--	--	27	--	--	<0.50	<0.50	--	**51**	<0.30	--	6.6	18	--	6.2	--	--	50	--	<0.17	--	--	<1.0	<3.0	<0.50	<3.0	38	43	--	7.95
SB-33-0.5	0.5	11/14/2024	<3.0	--	6.4	--	--	130	--	--	<0.50	<0.50	--	**55**	<0.30	--	15	29	--	17	--	--	70	--	<0.15	--	--	<0.99	<3.0	<0.50	<3.0	39	65	--	6.35
SB-33-5	5.0	11/14/2024	3.0	--	**17**	--	--	330	--	--	<0.49	**7.7**	--	**82**	--	--	8.6	510	--	**400**	--	--	60	--	**2.6**	--	--	2.1	<2.9	0.76	<2.9	30	**13,000**	--	--
SB-33-8.5	8.5	11/14/2024	5.5	--	**12**	--	--	650	--	--	<0.48	**9.6**	--	**590**	2.0	--	**27**	110	--	**460**	**10**	--	470	1.3	<0.14	--	--	2.3	<2.9	<0.48	<2.9	40	2,500	14	--
SB-33-9.5	9.5	11/14/2024	<2.9	--	7.5	--	--	32	--	--	<0.49	<0.49	--	**49**	--	--	6.9	24	--	16	--	--	51	--	<0.17	--	--	1.6	<2.9	<0.49	<2.9	41	76	--	--
SB-34-0.5	0.5	11/14/2024	<2.9	--	**12**	--	--	180	--	--	0.56	<0.48	--	**35**	--	--	13	46	--	64	0.97	--	49	--	0.24	--	--	<0.95	<2.9	<0.48	<2.9	30	120	--	7.19
SB-34-1.5	1.5	11/14/2024	<2.9	--	6.0	--	--	180	--	--	<0.48	<0.48	--	**75**	<0.30	--	15	52	--	56	0.38	--	110	--	<0.17	--	--	<0.95	<2.9	<0.48	<2.9	50	95	--	8.19
SB-34-4	4.0	11/14/2024	**41**	--	**19**	--	--	320	--	--	<0.48	<0.48	--	**160**	0.43	<0.030	**31**	63	--	**130**	0.40	1.8	250	0.74	<0.14	--	--	1.7	<2.9	<0.48	<2.9	51	67	--	7.70
SB-34-5.5	5.5	11/14/2024	<3.0	--	4.0	--	--	26	--	--	<0.50	<0.50	--	**51**	<0.30	--	6.2	14	--	5.3	--	--	47	--	<0.14	--	--	<0.99	<3.0	<0.50	<3.0	39	43	--	7.94
SB-35-1	1.0	11/15/2024	<2.9	--	4.3	--	--	330	--	--	0.72	<0.48	--	**16**	--	--	7.8	14	--	9.3	--	--	25	--	**1.6**	--	--	<0.96	<2.9	<0.48	<2.9	24	10	--	--
SB-35-6	6.0	11/15/2024	<2.9	--	4.9	--	--	64	--	--	<0.48	<0.48	--	**42**	--	--	6.9	21	--	17	--	--	41	--	<0.14	--	--	1.0	<2.9	<0.48	<2.9	35	55	--	--
SB-35-10	10.0	11/15/2024	<3.0	--	9.1	--	--	430	--	--	0.50	0.58	--	**48**	--	--	10	44	--	**540**	2.3	0.28	40	--	<0.17	--	--	1.7	<3.0	<0.50	<3.0	41	240	--	7.16
SB-36-1.5	1.5	11/15/2024	<3.0	--	3.3	--	--	480	--	--	0.69	<0.50	--	**10**	--	--	5.4	8.4	--	10	--	--	17	--	**1.9**	--	--	<1.0	<3.0	<0.50	<3.0	15	33	--	--
SB-36-4	4.0	11/15/2024	<2.9	--	4.8	--	--	200	--	--	0.60	<0.48	--	**31**	--	--	13	27	--	9.3	--	--	45	--	<0.14	--	--	<0.95	<2.9	<0.48	<2.9	42	54	--	--
SB-36-7	7.0	11/15/2024	4.1	--	**74**	--	--	160	--	--	<0.49	2.4	--	**47**	--	--	16	210	--	**590**	**14**	--	60	--	**1.7**	--	--	5.7	<2.9	0.59	<2.9	6.5	600	--	--
SB-36-10	10.0	11/15/2024	<3.0	--	3.8	--	--	29	--	--	<0.50	<0.50	--	**45**	--	--	5.2	15	--	11	--	--	42	--	<0.15	--	--	1.8	<3.0	<0.50	<3.0	35	70	--	--
SB-37-0.5	0.5	11/15/2024	<2.9	--	3.5	--	--	300	--	--	0.65	<0.49	--	**13**	--	--	7.2	11	--	9.4	--	--	30	--	**15**	<0.010	<0.010	<0.98	<2.9	<0.49	<2.9	19	34	--	8.95
SB-37-5	5.0	11/15/2024	<3.0	--	**11**	--	--	210	--	--	<0.50	0.72	--	**38**	--	--	14	59	--	**180**	1.0	0.10	42	--	**1.1**	--	--	2.4	<3.0	<0.50	<3.0	30	240	--	8.13
SB-37-10	10.0	11/15/2024	<2.9	--	**26**	--	--	88	--	--	<0.48	0.74	--	**37**	--	--	9.5	45	--	72	0.50	--	46	--	**9.1**	<0.010	<0.010	2.5	<2.9	<0.48	<2.9	20	330	--	7.67
SB-37-12	12.0	11/15/2024	<3.0	--	4.4	--	--	27	--	--	<0.50	<0.50	--	**52**	<0.30	--	6.9	18	--	5.7	--	--	51	--	<0.17	--	--	1.0	<3.0	<0.50	<3.0	39	40	--	7.70
SB-38-1	1.0	11/15/2024	<3.0	--	5.6	--	--	240	--	--	0.64	<0.50	--	**36**	--	--	14	27	--	13	--	--	52	--	**1.6**	--	--	<1.0	<3.0	<0.50	<3.0	44	56	--	--
SB-38-5	5.0	11/15/2024	<2.9	--	**13**	--	--	140	--	--	0.51	<0.48	--	**65**	<0.30	--	15	29	--	24	--	--	80	--	<0.14	--	--	<0.95	<2.9	<0.48	<2.9	49	90	--	7.76
SB-38-10	10.0	11/15/2024	<2.9	--	**15**	--	--	100	--	--	<0.49	1.3	--	**46**	--	--	7.9	64	--	**200**	0.91	0.70	29	--	**1.0**	--	--	5.2	<2.9	<0.49	<2.9	14	210	--	7.66
SB-38-12	12.0	11/15/2024	<2.9	--	4.7	--	--	31	--	--	<0.49	<0.49	--	**55**	<0.30	--	7.2	20	--	11	--	--	53	--	<0.16	--	--	<0.98	<2.9	<0.49	<2.9	40	46	--	7.67
SB-39-0.5	0.5	11/15/2024	<2.9	--	3.7	--	--	130	--	--	0.55	<0.49	--	**9.9**	--	--	5.8	7.9	--	6.7	--	--	24	--	**1.6**	--	--	<0.97	<2.9	<0.49	<2.9	20	25	--	--
SB-39-5	5.0	11/15/2024	15	--	**110**	--	<0.030	380	--	--	<0.50	**8.8**	--	**79**	--	--	18	510	--	**4,500**	--	1.9	56	--	**1.5**	--	--	8.0	<3.0	0.63	<3.0	3.8	2,100	--	--
DUP-13	5.0	11/15/2024	3.9	--	**28**	--	--	160	--	--	<0.50	**17**	--	**39**	--	--	16	66	--	**4,200**	--	--	64	--	0.44	--	--	3.0	<3.0	<0.50	<3.0	28	**5,000**	--	--
SB-39-10	10.0	11/15/2024	3.1	--	3.4	--	--	22	--	--	<0.49	<0.49	--	**40**	--	--	3.6	11	--	3.0	--	--	35	--	<0.17	--	--	2.2	<2.9	<0.49	<2.9	36	30	--	--
SB-40-0.5	0.5	11/15/2024	4.0	--	8.2	--	--	170	--	--	0.72	<0.50	--	**65**	<0.30	--	14	47	--	**92**	0.26	--	85	--	0.15	--	--	<1.0	<3.0	<0.50	<3.0	46	140	--	6.68
SB-40-5	5.0	11/15/2024	6.3	--	9.7	--	--	74	--	--	<0.50	<0.50	--	**45**	--	--	12	180	--	**260**	--	--	56	--	**1.2**	--	--	1.9	<3.0	<0.50	<3.0	13	190	--	--
SB-40-6	6.0	11/15/2024	3.3	--	10	--	--	35	--	--	<0.48	<0.48	--	**51**	<0.30	--	7.6	29	--	25	--	--	50	--	<0.15	--	--	<0.95	<2.9	<0.48	<2.9	40	62	--	8.12
SB-41-0.5	0.5	11/12/2024	<2.9	--	7.5	--	--	150	--	--	0.49	<0.48	--	**46**	--	--	13	39	--	49	--	--	54	--	<0.16	--	--	<0.95	<2.9	<0.48	<2.9	45	85	--	--
SB-41-2.5	2.5	11/12/2024	<3.0	--	7.9	--	--	170	--	--	0.53	<0.50	--	**19**	--	--	14	30	--	7.9	--	--	42	--	0.38	--	--	<0.99	<3.0	<0.50	<3.0	32	44	--	--
SB-42-0.5	0.5	11/12/2024	<2.9	--	4.2	--	--	140	--	--	<0.49	<0.49	--	**79**	<0.30	--	20	25	--	8.1	--	--	96	--	<0.14	--	--	<0.98	<2.9	<0.49	<2.9	49	33	--	6.94
SB-42-2.5	2.5	11/12/2024	<3.0	--	6.8	--	--	210	--	--	0.52	<0.50	--	**43**	--	--	12	46	--	43	--	--	61	--	0.20	--	--	<1.0	<3.0	<0.50	<3.0	51	97	--	--
DUP-03	2.5	11/12/2024	<3.0	--	6.4	--	--	220	--	--	<0.50	<0.50	--	**55**	--	--	15	39	--	35	--	--	78	--	0.22	--	--	<1.0	<3.0	<0.50	<3.0	47	83	--	--
SB-43-0.5	0.5	11/12/2024	<3.0	--	5.1	--	--	150	--	--	<0.50	<0.50	--	**41**	--	--	11	46	--	25	--	--	40	--	0.16	--	--	<1.0	<3.0	<0.50	<3.0	41	79	--	--
SB-43-2.5	2.5	11/12/2024	<2.9	--	8.1	--	--	170	--	--	0.56	<0.48	--	**42**	--	--	15	28	--	14	--	--	69	--	<0.15	--	--	<0.95	<2.9	<0.48	<2.9	41	56	--	--
VP-4-9	9.0	11/12/2024	<3.0	--	5.7	--	--	570	--	--	0.66	<0.50	--	**28**	--	--	14	38	--	15	--	--	35	--	<0.15	--	--	<0.99	<3.0	<0.50	<3.0	56	63	--	--
SS-1	0-0.5	11/15/2024	<2.9	--	8.9	--	--	31	--	--	<0.48	<0.48	--	**39**	--	--	7.3	52	--	69	0.19	--	43	--	<0.17	--	--	<0.96	<2.9	<0.48	<2.9	33	110	--	6.99
SS-2	0-0.5	11/15/2024	<2.9	--	9.1	--	--	31	--	--	<0.48	<0.48	--	**44**	--	--	6.0	37	--	41	--	--	43	--	0.16	--	--	0.95	<2.9	<0.48	<2.9	34	93	--	--
SS-3	0-0.5	11/15/2024	<3.0	--	**13**	--	--	29	--	--	<0.50	<0.50	--	**36**	--	--	5.1	29	--	35	--	--	34	--	<0.16	--	--	1.6	<3.0	<0.50	<3.0	34	74	--	--
SS-4	0-0.5	11/15/2024	<3.0	--	9.0	--	--	55	--	--	<0.50	<0.50	--	**47**	--	--	6.3	58	--	52	<0.25	--	48	--	0.20	--	--	<1.0	<3.0	<0.50	<3.0	36	130	--	7.02
Equipment blank unit in µg/L																																			
EB-11122024	--	11/12/2024	<40	--	<10	--	--	<10	--	--	<1.0	<5.0	--	<10	--	--	<5.0	<10	--	<10	--	--	<10	--	<0.40	--	--	<10	<30	<5.0	<50	<5.0	<50	--	--

Table 2 – Soil Analytical Results: Title 22 Metals and pH

Sample ID	Sample Depth (ft bgs)	Date Sampled	Antimony	Antimony (STLC)[1]	Arsenic	Arsenic (STLC)[1]	Arsenic (TCLP)[1]	Barium	Barium (STLC)[1]	Barium (TCLP)[1]	Beryllium	Cadmium	Cadmium (STLC)[1]	Chromium	Chromium (STLC)[1]	Chromium (TCLP)[1]	Cobalt	Copper	Copper (STLC)[1]	Lead	Lead (STLC)[1]	Lead (TCLP)[1]	Nickel	Nickel (STLC)[1]	Mercury	Mercury (STLC)[1]	Mercury (TCLP)[1]	Molybdenum	Selenium	Silver	Thallium	Vanadium	Zinc	Zinc (STLC)[1]	pH
			mg/kg																																SU
EB-11132024	--	11/13/2024	<40	--	<10	--	--	26	--	--	<1.0	<5.0	--	<10	--	--	<5.0	<10	--	14	--	--	<10	--	<0.40	--	--	<10	<30	<5.0	<50	<5.0	<50	--	--
EB-111424	--	11/14/2024	<40	--	<10	--	--	<10	--	--	<1.0	<5.0	--	<10	--	--	<5.0	24	--	<10	--	--	<10	--	<0.40	--	--	<10	<30	<5.0	<50	<5.0	<50	--	--
EB-111524	--	11/15/2024	<40	--	<10	--	--	<10	--	--	<1.0	<5.0	--	12	--	--	<5.0	<10	--	<10	--	--	<10	--	<0.40	--	--	<10	<30	<5.0	<50	<5.0	<50	--	--
EB-11162024	--	11/16/2024	<40	--	<10	--	--	18	--	--	<1.0	<5.0	--	<10	--	--	<5.0	<10	--	13	--	--	<10	--	<0.40	--	--	<10	<30	<5.0	<50	<5.0	<50	--	--
Screening Limits																																			
DTSC Residential Soil [2]			NE	--	11*	--	--	NE	--	--	16	7.1	--	0.3	--	--	NE	NE	--	80	--	--	820	--	1	--	--	NE	NE	NE	NE	NE	NE	--	--
EPA Residential Soil RSL [3]			31	--	0.68	--	--	15,000	--	--	160	7.1	--	0.95	--	--	23	3,100	--	200	--	--	1,400	--	7.1	--	--	390	390	390	0.78	390	23,000	--	--
TTLC			500	--	500	--	--	10,000	--	--	75	100	--	2,500	--	--	8,000	2,500	--	1,000	--	--	2,000	--	20	--	--	3,500	100	500	700	2,400	5,000	--	--
STLC (mg/L)			--	15	--	5	--	--	2,000	--	--	--	1	--	5	--	--	--	25	--	5	--	--	20	--	0.2	--	--	--	--	--	--	--	250	--
TCLP (mg/L)			--	--	--	--	5	--	--	100	--	--	--	--	--	5	--	--	--	--	--	5	--	--	--	--	0.2	--	--	--	--	--	--	--	--
pH Corrosivity Range [4]			--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	≤2 or ≥12.5

Notes:

ft bgs = feet below ground surface

mg/kg = milligrams per kilogram

mg/L = millgrams per liter

SU = Standard units

NE = not established

TTLC = Total Threshold Limit Concentration. If the soil concentration is equal to or greater than the TTLC limit, it is considered a California hazardous waste.

STLC = Soluble Threshold Limit Concentration; analyzed if concentration equals or exceeds STLC threshold by a factor of 10 or more (STLC trigger value). Exceedance of the STLC indicates the sample is considered a California hazardous waste.

TCLP = Toxicity Characteristic Leaching Procedure; analyzed if concentration equals or exceeds the TCLP threshold by a factor of 20 or more for federally regulated metals (TCLP Trigger value). Exceedance of the TCLP indicates the sample is considered a federal hazardous waste.

<X = Not detected at or above laboratory reporting limit

-- = not analyzed/not applicable

[1] = Results reported in milligrams per liter (mg/L)

[2] = Table 1: Human Health Risk Assessment (HHRA) Note 3, June 2020 - Revised May 2022, DTSC-Modified Screening Levels. Where applicable, most conservative value between the cancer and noncancer endpoint used.

[3] = US EPA Regional Screening Levels (RSLs) November 2024 (TR=1E-06 , THQ=1.0)

[4] = California Code of Regulations, Title 40, Chapter 1 Subchapter 1, Part 261, Subsection 261.22

* = Arsenic levels were compared to Duvergé, December 2011 Establishing Background Arsenic in Soil of the Urbanized San Francisco Bay Region.

Bold = Indicates concentration equals or exceeds applicable screening limits.

Yellow = Indicates the TTLC and/or the STLC is exceeded and the sample is considered a California Non-RCRA hazardous waste.

Oragne = Indicates the TCLP is exceeded and the sample is considered a RCRA (Federal) hazardous waste.

Table 3 – Soil Analytical Results: Total Petroleum Hydrocarbons

Sample ID	Sample Depth (ft bgs)	Date Sampled	TPHg	DRO C10-C28 (TPHd)	ORO C28-C44 (TPHmo)
			mg/kg		
SB-1-0.5	0.5	11/11/2024	<1.0	10	53
SB-1-4	4.0	11/11/2024	<0.6	<10	48.0
SB-1-6	6.0	11/11/2024	<0.7	<10	<20
SB-2-0.5	0.5	11/11/2024	<1.1	17	42
SB-2-5	5.0	11/11/2024	<1.2	20	<20
SB-2-10	10.0	11/11/2024	<0.9	<10	<20
SB-2-15	15.0	11/11/2024	<1.6	<10	<20
SB-3-1.5	1.5	11/12/2024	<0.9	<10	25
SB-3-5	5.0	11/12/2024	<0.9	<9.9	<20
SB-3-10	10.0	11/12/2024	<0.6	<10	<20
SB-3-15	15.0	11/12/2024	<0.7	<10	<20
DUP-01	15.0	11/12/2024	<1.0	<10	<20
SB-4-0.5	0.5	11/12/2024	<0.9	<9.9	26
SB-4-5	5.0	11/12/2024	<1.2	<10	<20
SB-4-10	10.0	11/12/2024	<0.9	<10	<20
SB-4-15	15.0	11/12/2024	<1.0	<10	<20
SB-5-0.5	0.5	11/12/2024	<1.0	<10	<20
SB-5-5	5.0	11/12/2024	<1.0	<9.9	<20
SB-5-10	10.0	11/12/2024	<1.0	<9.9	<20
DUP-02	10.0	11/12/2024	<1.5	<9.9	<20
SB-5-15	15.0	11/12/2024	<1.0	<10	<20
SB-6-1.5	1.5	11/12/2024	<0.9	<10	29
SB-6-5	5.0	11/12/2024	**1,700**	**590**	34
SB-6-7	7.0	11/12/2024	26 E	56	<20
SB-6-9.5	9.5	11/12/2024	<1.1	<9.9	<20
SB-7-0.5	0.5	11/11/2024	<0.8	200	660
SB-7-5	5.0	11/11/2024	<2.2	<10	<20
SB-7-7	7.0	11/11/2024	1.9	<10	<20
SB-8-0.5	0.5	11/13/2024	<1.0	51	150
SB-8-5	5.0	11/13/2024	<0.7	<9.9	25
SB-8-9.5	9.5	11/13/2024	<0.7	<10	22
SB-8-10.5	10.5	11/13/2024	<0.8	<10	<20
SB-9-0.5	0.5	11/13/2024	<1.0	**290**	1,000
SB-9-6	6.0	11/13/2024	<0.8	<9.9	<20
SB-9-8.5	8.5	11/13/2024	<1.3	<10	<20
SB-10-1.5	1.5	11/13/2024	<0.7	**330**	1,200
SB-10-2.5	2.5	11/13/2024	<0.8	24	64
DUP-05	2.5	11/13/2024	<0.7	43	110
SB-10-6	6.0	11/13/2024	<0.8	<10	<20
SB-10-9	9.0	11/13/2024	<1.0	<10	<20
SB-10-10	10.0	11/13/2024	<0.8	<10	<20
SB-11-0.5	0.5	11/13/2024	<0.8	34	96
SB-11-5	5.0	11/13/2024	<1.1	20	<20
SB-11-8	8.0	11/13/2024	<0.8	<10	<20
SB-11-10	10.0	11/13/2024	<1.1	<9.9	<20
SB-12-1.5	1.5	11/14/2024	<43	**430**	1,800
SB-12-2.5	2.5	11/14/2024	<1.0	**460**	2,000
SB-12-6	6.0	11/14/2024	<1.1	19	<20
SB-12-10	10.0	11/14/2024	2.6 E	110	<20
SB-12-15	15.0	11/14/2024	<0.9	<9.9	<20
SB-13-1.5	1.5	11/13/2024	<1.1	220	610
SB-13-5	5.0	11/14/2024	<48	<10	<20
SB-13-6.5	6.5	11/14/2024	<0.6	<10	<20
DUP-08	6.5	11/14/2024	<0.7	--	--
SB-14-0.5	0.5	11/13/2024	<0.7	22	58
SB-14-2.5	2.5	11/13/2024	<2.3	13	37
SB-14-5	5.0	11/14/2024	<1.5	84	320
SB-14-6.5	6.5	11/14/2024	<1.5	<9.9	<20
SB-14-9	9.0	11/14/2024	<1.2	<10	<20
SB-15-0.5	0.5	11/14/2024	<1.0	39	93
SB-16-0.5	0.5	11/13/2024	<1.4	230	1,700
SB-16-5	5.0	11/13/2024	<1.0	<9.9	<20
DUP-06	5.0	11/13/2024	<1.5	<9.9	<20
SB-16-10	10.0	11/13/2024	<1.0	<9.9	<20
SB-16-15	15.0	11/13/2024	<0.7	19	35

SB-17-0.5	0.5	11/13/2024	<1.0	<500	3,000
SB-17-2.5	2.5	11/13/2024	<0.8	40	140
SB-17-7	7.0	11/13/2024	<1.0	<10	<20
SB-17-10	10.0	11/13/2024	<1.5	<10	<20
SB-18-1	1.0	11/14/2024	<0.9	<9.9	34
SB-18-6	6.0	11/14/2024	<1.7	25	29
SB-18-12	12.0	11/14/2024	<1.8	<10	<20
SB-18-16	16.0	11/14/2024	<1.2	<10	<20
SB-19-0.5	0.5	11/14/2024	<1.1	120	420
SB-19-4	4.0	11/14/2024	<1.3	67	82
SB-19-10	10.0	11/14/2024	<1.3	59	61
SB-19-12	12.0	11/14/2024	<1.1	<9.9	<20
SB-20-1	1.0	11/14/2024	<0.9	**330**	1,200
SB-20-5	5.0	11/14/2024	<1.3	<9.9	<20
SB-20-10	10.0	11/14/2024	<1.2	100	85
SB-20-12	12.0	11/14/2024	<0.8	<10	<20
SB-21-0.5	0.5	11/14/2024	<2.0	230	1,600
DUP-09	0.5	11/14/2024	<2.2	**310**	2,000
SB-21-5	5.0	11/14/2024	<1.1	<10	<20
SB-21-10	10.0	11/14/2024	<1.0	<10	<20
SB-21-15	15.0	11/14/2024	<2.5	<9.9	<20
SB-22-1	1.0	11/13/2024	<0.8	**310**	2,200
SB-22-5	5.0	11/13/2024	<0.6	<9.9	<20
SB-22-10	10.0	11/13/2024	<1.2	<10	<20
SB-22-13	13.0	11/13/2024	<0.9	<10	<20
SB-23-0.5	0.5	11/13/2024	<1.0	<50	210
SB-23-10	10.0	11/13/2024	<1.5	<10	<20
SB-24-0.5	0.5	11/15/2024	<0.9	<9.9	31
SB-24-7	7.0	11/15/2024	<0.7	10	<20
SB-24-9.5	9.5	11/15/2024	1.6	57	78
SB-24-10.5	10.5	11/15/2024	<1.0	<10	<20
SB-25-0.5	0.5	11/14/2024	<0.9	**510**	2,300
SB-25-5	5.0	11/14/2024	<1.2	<9.9	29
SB-25-10	10.0	11/14/2024	<0.7	<10	<20
SB-25-12	12.0	11/14/2024	<1.3	<10	<20
SB-26-0.5	0.5	11/14/2024	<1.1	<9.9	<20
SB-26-2	2.0	11/14/2024	<1.0	49	150
DUP-10	2.0	11/14/2024	<1.2	16	88
SB-26-5	5.0	11/14/2024	<0.7	13	20
SB-26-7	7.0	11/14/2024	<1.5	<10	<20
SB-27-1	1.0	11/14/2024	<0.9	50	150
SB-27-5	5.0	11/14/2024	<2.1	<9.9	<20
SB-27-12	12.0	11/14/2024	3.7 E	**590**	230
SB-27-14	14.0	11/14/2024	<0.9	<10	<20
SB-28-0.5	0.5	11/15/2024	<1.5	110	470
SB-28-5	5.0	11/15/2024	<1.0	<10	<20
SB-28-10	10.0	11/15/2024	<1.6	<10	<20
SB-28-14	14.0	11/15/2024	<1.4	<10	<20
SB-29-1	1.0	11/15/2024	<1.1	<10	<20
SB-29-5	5.0	11/15/2024	<1.2	22	31
SB-29-10	10.0	11/15/2024	<1.2	**3,200**	6,000
SB-29-12	12.0	11/15/2024	<1.1	<9.9	<20
SB-30-0.5	0.5	11/15/2024	<1.1	27	86
DUP-14	0.5	11/15/2024	<2.0	<9.9	30
SB-30-5	5.0	11/16/2024	<3.1	21	56
SB-30-8	8.0	11/16/2024	<1.7	<10	<20
SB-31-1.5	1.5	11/15/2024	<0.9	31	100
SB-31-5	5.0	11/15/2024	<0.7	<10	<20
SB-31-10	10.0	11/15/2024	1.7	33	42
SB-31-11.5	11.5	11/15/2024	<0.8	<10	<20
SB-32-1	1.0	11/15/2024	<1.2	150	650
SB-32-5	5.0	11/15/2024	<1.2	15	<20
SB-32-11	11.0	11/15/2024	<3.6	<10	<20
DUP-11	11.0	11/15/2024	<3.2	<10	<20
SB-32-13	13.0	11/15/2024	<1.0	<10	<20
SB-33-0.5	0.5	11/14/2024	<0.9	<9.9	31
SB-33-5	5.0	11/14/2024	1.9	190	230
SB-33-8.5	8.5	11/14/2024	<1.1	<10	<20
SB-33-9.5	9.5	11/14/2024	<1.1	<9.9	<20
SB-34-0.5	0.5	11/14/2024	<0.8	<10	<20
SB-34-1.5	1.5	11/14/2024	<1.1	40	110
SB-34-4	4.0	11/14/2024	<0.7	<10	23
SB-34-5.5	5.5	11/14/2024	<1.3	<10	<20
SB-35-1	1.0	11/15/2024	<3.1	**330**	1,100
SB-35-6	6.0	11/15/2024	<1.6	<10	<20
SB-35-10	10.0	11/15/2024	<1.2	210	110

SB-36-1.5	1.5	11/15/2024	<0.7	50	150
SB-36-4	4.0	11/15/2024	<0.8	<20	<40
SB-36-7	7.0	11/15/2024	<1.5	170	140
SB-36-10	10.0	11/15/2024	<0.9	<10	<20
SB-37-0.5	0.5	11/15/2024	<2.3	18	120
SB-37-5	5.0	11/15/2024	<2.7	**350**	270
SB-37-10	10.0	11/15/2024	<1.3	<10	<20
SB-37-12	12.0	11/15/2024	<1.7	<10	<20
SB-38-1	1.0	11/15/2024	<1.0	38	260
SB-38-5	5.0	11/15/2024	<0.7	<9.9	<20
SB-38-10	10.0	11/15/2024	1.8	31	29
SB-38-12	12.0	11/15/2024	<1.1	<10	<20
SB-39-0.5	0.5	11/15/2024	<2.5	200	1,400
SB-39-5	5.0	11/15/2024	4.3	33	43
DUP-13	5.0	11/15/2024	<87	<9.9	<20
SB-39-10	10.0	11/15/2024	<1.7	<10	<20
SB-40-0.5	0.5	11/15/2024	<0.7	10	40
SB-40-5	5.0	11/15/2024	<1.6	160	120
SB-40-6	6.0	11/15/2024	<1.0	<10	<20
VP-4-9	9.0	11/12/2024	<0.9	<10	<20
SS-1	0-0.5	11/15/2024	<0.9	<10	<20
SS-2	0-0.5	11/15/2024	<1.0	<9.9	<20
SS-3	0-0.5	11/15/2024	<1.3	<9.9	<20
SS-4	0-0.5	11/15/2024	<1.0	<10	<20
Trip Blanks (unit in µg/L)					
TB-11132024 [a]	--	11/13/2024	57	--	--
TB-11132024 [b]	--	11/13/2024	<50	--	--
TB-11132024 [c]	--	11/13/2024	<50	--	--
TB-11142024 [d]	--	11/14/2024	<50	--	--
TB-11142024 [e]	--	11/14/2024	<50	--	--
TB-11152024 [f]	--	11/15/2024	<100	--	--
TB-11152024 [g]	--	11/15/2024	<100	--	--
TB-11162024 [h]	--	11/16/2024	<50	--	--
TB-11162024 [i]	--	11/16/2024	<100	--	--
Screening Limits					
SFBRWQCB Residential ESLs [1]			430	260	12,000

Notes:

ft bgs = feet below ground surface

mg/kg = milligrams per kilogram

TPHg = total petroleum hydrocarbons as gasoline. Analyzed by United States Environmental Protection Agency (EPA) Method 8260B

DRO = diesel range oranics (TPHd = total petroleum hydrocarbons as diesel). Analyzed by EPA Method 8015M

ORO = oil range oranics (TPHmo = total petroleum hydrocarbons as motor oil). Analyzed by EPA Method 8015M

E = Response exceeds instrument's liner range

SFBRWQCB = San Francisco Bay Regional Water Quality Control Board

<X = Not detected at or above laboratory reporting limit

-- = not analyzed/not applicable

[a] = Lab ID 520246-006

[b] = Lab ID 520247-017

[c] = Lab ID 520248-018

[d] = Lab ID 520357-023

[e] = Lab ID 520358-024

[f] = Lab ID 520360-028

[g] = Lab ID 520361-025

[h] = Lab ID 520597-022

[i] = Lab ID 520603-007

[1] = 2019 (Rev.2) SFBRWQCB Residential Environmental Screening Levels (ESL), Table S-1: Soil Direct Exposure. Where applicable, most conservative value between the carcinogenic and noncarcinogenic endpoint used.

Bold = Indicates concentration equals or exceeds applicable screening limits.

Table 4 – Soil Analytical Results: Volatile Organic Compounds

Sample ID	Sample Depth (ft bgs)	Date Sampled	Acetone	Benzene	Trichloroethene	4-Methyl-2-Pentanone	Toluene	Ethylbenzene	Isopropylbenzene	Propylbenzene	tert-Butylbenzene	1,2,4-Trimethylbenzene	sec-Butylbenzene	para-Isopropyl Toluene	1,4-Dichlorobenzene	n-Butylbenzene	2-Butanone	Naphthalene	Other VOCs
			mg/kg																
SB-1-0.5	0.5	11/11/2024	<0.097	<0.0048	<0.0048	<0.0048	<0.0048	<0.0048	<0.0048	<0.0048	<0.0048	<0.0048	<0.0048	<0.0048	<0.0048	<0.0048	<0.097	<0.0048	ND
SB-1-4	4.0	11/11/2024	<0.059	<0.0029	<0.0029	<0.0029	<0.0029	<0.0029	<0.0029	<0.0029	<0.0029	<0.0029	<0.0029	<0.0029	<0.0029	<0.0029	<0.059	<0.0029	ND
SB-1-6	6.0	11/11/2024	<0.066	<0.0033	<0.0033	<0.0033	<0.0033	<0.0033	<0.0033	<0.0033	<0.0033	<0.0033	<0.0033	<0.0033	<0.0033	<0.0033	<0.066	<0.0033	ND
SB-2-0.5	0.5	11/11/2024	<0.110	<0.0053	<0.0053	<0.0053	<0.0053	<0.0053	<0.0053	<0.0053	<0.0053	<0.0053	<0.0053	<0.0053	<0.0053	<0.0053	<0.110	<0.0053	ND
SB-2-5	5.0	11/11/2024	<0.120	<0.0060	<0.0060	<0.0060	<0.0060	<0.0060	<0.0060	<0.0060	<0.0060	<0.0060	<0.0060	<0.0060	<0.0060	<0.0060	<0.120	<0.0060	ND
SB-2-10	10.0	11/11/2024	<0.090	<0.0045	<0.0045	<0.0045	<0.0045	<0.0045	<0.0045	<0.0045	<0.0045	<0.0045	<0.0045	<0.0045	<0.0045	<0.0045	<0.090	<0.0045	ND
SB-2-15	15.0	11/11/2024	<0.160	<0.0081	<0.0081	<0.0081	<0.0081	<0.0081	<0.0081	<0.0081	<0.0081	<0.0081	<0.0081	<0.0081	<0.0081	<0.0081	<0.160	<0.0081	ND
SB-3-1.5	1.5	11/12/2024	<0.086	<0.0043	<0.0043	<0.0043	<0.0043	<0.0043	<0.0043	<0.0043	<0.0043	<0.0043	<0.0043	<0.0043	<0.0043	<0.0043	<0.086	<0.0043	ND
SB-3-5	5.0	11/12/2024	<0.088	<0.0044	<0.0044	<0.0044	<0.0044	<0.0044	<0.0044	<0.0044	<0.0044	<0.0044	<0.0044	<0.0044	<0.0044	<0.0044	<0.088	<0.0044	ND
SB-3-10	10.0	11/12/2024	<0.064	<0.0032	<0.0032	<0.0032	<0.0032	<0.0032	<0.0032	<0.0032	<0.0032	<0.0032	<0.0032	<0.0032	<0.0032	<0.0032	<0.064	<0.0032	ND
SB-3-15	15.0	11/12/2024	<0.068	<0.0034	<0.0034	<0.0034	<0.0034	<0.0034	<0.0034	<0.0034	<0.0034	<0.0034	<0.0034	<0.0034	<0.0034	<0.0034	<0.068	<0.0034	ND
DUP-01	15.0	11/12/2024	<0.097	<0.0049	<0.0049	<0.0049	<0.0049	<0.0049	<0.0049	<0.0049	<0.0049	<0.0049	<0.0049	<0.0049	<0.0049	<0.0049	<0.097	<0.0049	ND
SB-4-0.5	0.5	11/12/2024	<0.092	<0.0046	<0.0046	<0.0046	<0.0046	<0.0046	<0.0046	<0.0046	<0.0046	<0.0046	<0.0046	<0.0046	<0.0046	<0.0046	<0.092	<0.0046	ND
SB-4-5	5.0	11/12/2024	<0.120	<0.0060	<0.0060	<0.0060	<0.0060	<0.0060	<0.0060	<0.0060	<0.0060	<0.0060	<0.0060	<0.0060	<0.0060	<0.0060	<0.120	<0.0060	ND
SB-4-10	10.0	11/12/2024	<0.092	<0.0046	<0.0046	<0.0046	<0.0046	<0.0046	<0.0046	<0.0046	<0.0046	<0.0046	<0.0046	<0.0046	<0.0046	<0.0046	<0.092	<0.0046	ND
SB-4-15	15.0	11/12/2024	<0.098	<0.0049	<0.0049	<0.0049	<0.0049	<0.0049	<0.0049	<0.0049	<0.0049	<0.0049	<0.0049	<0.0049	<0.0049	<0.0049	<0.098	<0.0049	ND
SB-5-0.5	0.5	11/12/2024	<0.099	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	<0.099	<0.0050	ND
SB-5-5	5.0	11/12/2024	<0.100	<0.0052	<0.0052	<0.0052	<0.0052	<0.0052	<0.0052	<0.0052	<0.0052	<0.0052	<0.0052	<0.0052	<0.0052	<0.0052	<0.100	<0.0052	ND
SB-5-10	10.0	11/12/2024	<0.100	<0.0052	<0.0052	<0.0052	<0.0052	<0.0052	<0.0052	<0.0052	<0.0052	<0.0052	<0.0052	<0.0052	<0.0052	<0.0052	<0.100	<0.0052	ND
DUP-02	10.0	11/12/2024	<0.150	<0.0077	<0.0077	<0.0077	<0.0077	<0.0077	<0.0077	<0.0077	<0.0077	<0.0077	<0.0077	<0.0077	<0.0077	<0.0077	<0.150	<0.0077	ND
SB-5-15	15.0	11/12/2024	<0.100	<0.0051	<0.0051	<0.0051	<0.0051	<0.0051	<0.0051	<0.0051	<0.0051	<0.0051	<0.0051	<0.0051	<0.0051	<0.0051	<0.100	<0.0051	ND
SB-6-1.5	1.5	11/12/2024	<0.092	<0.0046	<0.0046	<0.0046	<0.0046	<0.0046	<0.0046	<0.0046	<0.0046	<0.0046	<0.0046	<0.0046	<0.0046	<0.0046	<0.092	<0.0046	ND
SB-6-5	5.0	11/12/2024	<0.074	<0.0037	<0.0037	<0.0037	<0.0037	0.0091	0.039	0.041	0.0080	<0.0037	0.086	0.084	<0.0037	0.110	<0.074	<0.0037	ND
SB-6-7	7.0	11/12/2024	<0.082	<0.0041	<0.0041	<0.0041	<0.0041	<0.0041	<0.0041	<0.0041	<0.0041	<0.0041	0.0089	<0.0041	<0.0041	<0.0041	<0.082	<0.0041	ND
SB-6-9.5	9.5	11/12/2024	<0.110	<0.0056	<0.0056	<0.0056	<0.0056	<0.0056	<0.0056	<0.0056	<0.0056	<0.0056	<0.0056	<0.0056	<0.0056	<0.0056	<0.110	<0.0056	ND
SB-7-0.5	0.5	11/11/2024	<0.082	<0.0041	<0.0041	<0.0041	<0.0041	<0.0041	<0.0041	<0.0041	<0.0041	<0.0041	<0.0041	<0.0041	<0.0041	<0.0041	<0.082	<0.0041	ND
SB-7-5	5.0	11/11/2024	<0.220	<0.011	<0.011	<0.011	<0.011	<0.011	<0.011	<0.011	<0.011	<0.011	<0.011	<0.011	<0.011	<0.011	<0.220	<0.011	ND
SB-7-7	7.0	11/11/2024	<0.160	<0.0078	<0.0078	<0.0078	<0.0078	<0.0078	<0.0078	<0.0078	<0.0078	<0.0078	<0.0078	<0.0078	<0.0078	<0.0078	<0.160	<0.0078	ND
SB-8-0.5	0.5	11/13/2024	<0.097	<0.0049	<0.0049	<0.0049	<0.0049	<0.0049	<0.0049	<0.0049	<0.0049	<0.0049	<0.0049	<0.0049	<0.0049	<0.0049	<0.097	<0.0049	ND
SB-8-5	5.0	11/13/2024	<0.067	<0.0034	<0.0034	<0.0034	<0.0034	<0.0034	<0.0034	<0.0034	<0.0034	<0.0034	<0.0034	<0.0034	<0.0034	<0.0034	<0.067	<0.0034	ND
SB-8-9.5	9.5	11/13/2024	<0.073	<0.0036	<0.0036	<0.0036	<0.0036	<0.0036	<0.0036	<0.0036	<0.0036	<0.0036	<0.0036	<0.0036	<0.0036	<0.0036	<0.073	<0.0036	ND
SB-8-10.5	10.5	11/13/2024	<0.076	<0.0038	<0.0038	<0.0038	<0.0038	<0.0038	<0.0038	<0.0038	<0.0038	<0.0038	<0.0038	<0.0038	<0.0038	<0.0038	<0.076	<0.0038	ND
SB-9-0.5	0.5	11/13/2024	<0.100	<0.0051	<0.0051	<0.0051	<0.0051	<0.0051	<0.0051	<0.0051	<0.0051	<0.0051	<0.0051	<0.0051	<0.0051	<0.0051	<0.100	<0.0051	ND
SB-9-6	6.0	11/13/2024	<0.076	<0.0038	<0.0038	<0.0038	<0.0038	<0.0038	<0.0038	<0.0038	<0.0038	<0.0038	<0.0038	<0.0038	<0.0038	<0.0038	<0.076	<0.0038	ND
SB-9-8.5	8.5	11/13/2024	<0.130	<0.0066	<0.0066	<0.0066	<0.0066	<0.0066	<0.0066	<0.0066	<0.0066	<0.0066	<0.0066	<0.0066	<0.0066	<0.0066	<0.130	<0.0066	ND
SB-10-1.5	1.5	11/13/2024	<0.068	<0.0034	<0.0034	<0.0034	<0.0034	<0.0034	<0.0034	<0.0034	<0.0034	<0.0034	<0.0034	<0.0034	<0.0034	<0.0034	<0.068	<0.0034	ND
SB-10-2.5	2.5	11/13/2024	<0.079	<0.0039	<0.0039	<0.0039	<0.0039	<0.0039	<0.0039	<0.0039	<0.0039	<0.0039	<0.0039	<0.0039	<0.0039	<0.0039	<0.079	<0.0039	ND
DUP-05	2.5	11/13/2024	<0.066	<0.0033	<0.0033	<0.0033	<0.0033	<0.0033	<0.0033	<0.0033	<0.0033	<0.0033	<0.0033	<0.0033	<0.0033	<0.0033	<0.066	<0.0033	ND
SB-10-6	6.0	11/13/2024	<0.082	<0.0041	<0.0041	<0.0041	<0.0041	<0.0041	<0.0041	<0.0041	<0.0041	<0.0041	<0.0041	<0.0041	<0.0041	<0.0041	<0.082	<0.0041	ND
SB-10-9	9.0	11/13/2024	<0.100	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.100	<0.005	ND
SB-10-10	10.0	11/13/2024	<0.085	<0.0042	<0.0042	<0.0042	<0.0042	<0.0042	<0.0042	<0.0042	<0.0042	<0.0042	<0.0042	<0.0042	<0.0042	<0.0042	<0.085	<0.0042	ND

Table 4 – Soil Analytical Results: Volatile Organic Compounds

Sample ID	Sample Depth (ft bgs)	Date Sampled	Acetone	Benzene	Trichloroethene	4-Methyl-2-Pentanone	Toluene	Ethylbenzene	Isopropylbenzene	Propylbenzene	tert-Butylbenzene	1,2,4-Trimethylbenzene	sec-Butylbenzene	para-Isopropyl Toluene	1,4-Dichlorobenzene	n-Butylbenzene	2-Butanone	Naphthalene	Other VOCs
			mg/kg																
SB-11-0.5	0.5	11/13/2024	<0.082	<0.0041	<0.0041	<0.0041	<0.0041	<0.0041	<0.0041	<0.0041	<0.0041	<0.0041	<0.0041	<0.0041	<0.0041	<0.0041	<0.082	<0.0041	ND
SB-11-5	5.0	11/13/2024	<0.110	<0.0057	<0.0057	<0.0057	6.3	<0.0057	<0.0057	<0.0057	<0.0057	<0.0057	<0.0057	<0.0057	<0.0057	<0.0057	<0.110	<0.0057	ND
SB-11-8	8.0	11/13/2024	<0.083	<0.0041	<0.0041	<0.0041	<0.0041	<0.0041	<0.0041	<0.0041	<0.0041	<0.0041	<0.0041	<0.0041	<0.0041	<0.0041	<0.083	<0.0041	ND
SB-11-10	10.0	11/13/2024	<0.110	<0.0053	<0.0053	<0.0053	<0.0053	<0.0053	<0.0053	<0.0053	<0.0053	<0.0053	<0.0053	<0.0053	<0.0053	<0.0053	<0.110	<0.0053	ND
SB-12-1.5	1.5	11/14/2024	<4.3	<0.220	<0.220	<0.220	<0.220	<0.220	<0.220	<0.220	<0.220	<0.220	<0.220	<0.220	<0.220	<0.220	<4.3	<0.220	ND
SB-12-2.5	2.5	11/14/2024	<0.099	<0.0049	<0.0049	<0.0049	<0.0049	<0.0049	<0.0049	<0.0049	<0.0049	<0.0049	<0.0049	<0.0049	<0.0049	<0.0049	<0.099	<0.0049	ND
SB-12-6	6.0	11/14/2024	<0.110	<0.0057	<0.0057	<0.0057	<0.0057	<0.0057	<0.0057	<0.0057	<0.0057	<0.0057	<0.0057	<0.0057	<0.0057	<0.0057	<0.110	<0.0057	ND
SB-12-10	10.0	11/14/2024	0.180	<0.0038	<0.0038	<0.0038	<0.0038	<0.0038	<0.0038	<0.0038	<0.0038	<0.0038	<0.0038	<0.0038	<0.0038	<0.0038	<0.076	<0.0038	ND
SB-12-15	15.0	11/14/2024	<0.089	<0.0044	<0.0044	<0.0044	<0.0044	<0.0044	<0.0044	<0.0044	<0.0044	<0.0044	<0.0044	<0.0044	<0.0044	<0.0044	<0.089	<0.0044	ND
SB-13-1.5	1.5	11/13/2024	<0.110	0.0063	<0.0055	<0.0055	<0.0055	<0.0055	<0.0055	<0.0055	<0.0055	<0.0055	<0.0055	<0.0055	<0.0055	<0.0055	<0.110	<0.0055	ND
SB-13-5	5.0	11/14/2024	<0.0048	<0.240	<0.240	<0.240	<0.240	<0.240	<0.240	<0.240	<0.240	<0.240	<0.240	<0.240	<0.240	<0.240	<0.0048	<0.240	ND
SB-13-6.5	6.5	11/14/2024	<0.063	<0.0032	<0.0032	<0.0032	<0.0032	<0.0032	<0.0032	<0.0032	<0.0032	<0.0032	<0.0032	<0.0032	<0.0032	<0.0032	<0.063	<0.0032	ND
DUP-08	6.5	11/14/2024	<0.066	<0.0033	<0.0033	<0.0033	<0.0033	<0.0033	<0.0033	<0.0033	<0.0033	<0.0033	<0.0033	<0.0033	<0.0033	<0.0033	<0.066	<0.0033	ND
SB-14-0.5	0.5	11/13/2024	0.120	<0.0034	<0.0034	<0.0034	<0.0034	<0.0034	<0.0034	<0.0034	<0.0034	<0.0034	<0.0034	<0.0034	<0.0034	<0.0034	<0.067	<0.0034	ND
SB-14-2.5	2.5	11/13/2024	0.240	<0.012	<0.012	<0.012	<0.012	<0.012	<0.012	<0.012	<0.012	<0.012	<0.012	<0.012	<0.012	<0.012	<0.230	<0.012	ND
SB-14-5	5.0	11/14/2024	<0.150	<0.0077	<0.0077	<0.0077	<0.0077	<0.0077	<0.0077	<0.0077	<0.0077	<0.0077	<0.0077	<0.0077	<0.0077	<0.0077	<0.150	<0.0077	ND
SB-14-6.5	6.5	11/14/2024	0.170	<0.0075	<0.0075	<0.0075	<0.0075	<0.0075	<0.0075	<0.0075	<0.0075	<0.0075	<0.0075	<0.0075	<0.0075	<0.0075	<0.150	<0.0075	ND
SB-14-9	9.0	11/14/2024	0.130	<0.0061	<0.0061	<0.0061	<0.0061	<0.0061	<0.0061	<0.0061	<0.0061	<0.0061	<0.0061	0.0070	0.0070	<0.0061	<0.120	<0.0061	ND
SB-15-0.5	0.5	11/14/2024	0.120	<0.0048	<0.0048	<0.0048	<0.0048	<0.0048	<0.0048	<0.0048	<0.0048	<0.0048	<0.0048	<0.0048	<0.0048	<0.0048	<0.095	<0.0048	ND
SB-16-0.5	0.5	11/13/2024	<0.140	<0.0068	<0.0068	<0.0068	<0.0068	<0.0068	<0.0068	<0.0068	<0.0068	<0.0068	<0.0068	<0.0068	<0.0068	<0.0068	<0.140	<0.0068	ND
SB-16-5	5.0	11/13/2024	<0.100	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.100	<0.005	ND
DUP-06	5.0	11/13/2024	<0.150	<0.0073	<0.0073	<0.0073	<0.0073	<0.0073	<0.0073	<0.0073	<0.0073	<0.0073	<0.0073	<0.0073	<0.0073	<0.0073	<0.150	<0.0073	ND
SB-16-10	10.0	11/13/2024	<0.100	<0.0051	<0.0051	<0.0051	<0.0051	<0.0051	<0.0051	<0.0051	<0.0051	<0.0051	<0.0051	<0.0051	<0.0051	<0.0051	<0.100	<0.0051	ND
SB-16-15	15.0	11/13/2024	<0.070	<0.0035	<0.0035	<0.0035	<0.0035	<0.0035	<0.0035	<0.0035	<0.0035	<0.0035	<0.0035	<0.0035	<0.0035	<0.0035	<0.070	<0.0035	ND
SB-17-0.5	0.5	11/13/2024	<0.097	<0.0049	<0.0049	<0.0049	<0.0049	<0.0049	<0.0049	<0.0049	<0.0049	<0.0049	<0.0049	<0.0049	<0.0049	<0.0049	<0.097	<0.0049	ND
SB-17-2.5	2.5	11/13/2024	<0.083	<0.0042	<0.0042	<0.0042	<0.0042	<0.0042	<0.0042	<0.0042	<0.0042	<0.0042	<0.0042	<0.0042	<0.0042	<0.0042	<0.083	<0.0042	ND
SB-17-7	7.0	11/13/2024	<0.100	<0.0051	<0.0051	<0.0051	<0.0051	<0.0051	<0.0051	<0.0051	<0.0051	<0.0051	<0.0051	<0.0051	<0.0051	<0.0051	<0.100	<0.0051	ND
SB-17-10	10.0	11/13/2024	<0.150	<0.0075	<0.0075	<0.0075	<0.0075	<0.0075	<0.0075	<0.0075	<0.0075	<0.0075	<0.0075	<0.0075	<0.0075	<0.0075	<0.150	<0.0075	ND
SB-18-1	1.0	11/14/2024	<0.086	<0.0043	<0.0043	<0.0043	<0.0043	<0.0043	<0.0043	<0.0043	<0.0043	<0.0043	<0.0043	<0.0043	<0.0043	<0.0043	<0.086	<0.0043	ND
SB-18-6	6.0	11/14/2024	<0.170	<0.0083	<0.0083	<0.0083	<0.0083	<0.0083	<0.0083	<0.0083	<0.0083	<0.0083	<0.0083	<0.0083	<0.0083	<0.0083	<0.170	<0.0083	ND
SB-18-12	12.0	11/14/2024	<0.180	<0.0089	<0.0089	<0.0089	<0.0089	<0.0089	<0.0089	<0.0089	<0.0089	<0.0089	<0.0089	<0.0089	<0.0089	<0.0089	<0.180	<0.0089	ND
SB-18-16	16.0	11/14/2024	<0.120	<0.0061	<0.0061	<0.0061	<0.0061	<0.0061	<0.0061	<0.0061	<0.0061	<0.0061	<0.0061	<0.0061	<0.0061	<0.0061	<0.120	<0.0061	ND
SB-19-0.5	0.5	11/14/2024	<0.110	<0.0053	<0.0053	<0.0053	<0.0053	<0.0053	<0.0053	<0.0053	<0.0053	<0.0053	<0.0053	<0.0053	<0.0053	<0.0053	<0.110	<0.0053	ND
SB-19-4	4.0	11/14/2024	<0.130	0.016	<0.0065	<0.0065	0.010	<0.0065	<0.0065	<0.0065	<0.0065	<0.0065	<0.0065	0.012	<0.0065	<0.0065	<0.130	<0.0065	ND
SB-19-10	10.0	11/14/2024	0.180	<0.0067	<0.0067	<0.0067	<0.0067	<0.0067	<0.0067	<0.0067	<0.0067	<0.0067	<0.0067	<0.0067	<0.0067	<0.0067	<0.130	<0.0067	ND
SB-19-12	12.0	11/14/2024	<0.110	<0.0053	<0.0053	<0.0053	<0.0053	<0.0053	<0.0053	<0.0053	<0.0053	<0.0053	<0.0053	<0.0053	<0.0053	<0.0053	<0.110	<0.0053	ND
SB-20-1	1.0	11/14/2024	<0.092	<0.0046	<0.0046	<0.0046	<0.0046	<0.0046	<0.0046	<0.0046	<0.0046	<0.0046	<0.0046	<0.0046	<0.0046	<0.0046	<0.092	<0.0046	ND
SB-20-5	5.0	11/14/2024	<0.130	<0.0064	<0.0064	<0.0064	<0.0064	<0.0064	<0.0064	<0.0064	<0.0064	<0.0064	<0.0064	<0.0064	<0.0064	<0.0064	<0.130	<0.0064	ND
SB-20-10	10.0	11/14/2024	1.1 E	<0.0060	<0.0060	<0.0060	<0.0060	<0.0060	<0.0060	<0.0060	<0.0060	<0.0060	<0.0060	<0.0060	<0.0060	<0.0060	0.390	<0.0060	ND
SB-20-12	12.0	11/14/2024	<0.084	<0.0042	<0.0042	<0.0042	<0.0042	<0.0042	<0.0042	<0.0042	<0.0042	<0.0042	<0.0042	<0.0042	<0.0042	<0.0042	<0.084	<0.0042	ND
SB-21-0.5	0.5	11/14/2024	<0.200	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.200	<0.010	ND

Table 4 – Soil Analytical Results: Volatile Organic Compounds

Sample ID	Sample Depth (ft bgs)	Date Sampled	Acetone	Benzene	Trichloroethene	4-Methyl-2-Pentanone	Toluene	Ethylbenzene	Isopropylbenzene	Propylbenzene	tert-Butylbenzene	1,2,4-Trimethylbenzene	sec-Butylbenzene	para-Isopropyl Toluene	1,4-Dichlorobenzene	n-Butylbenzene	2-Butanone	Naphthalene	Other VOCs
			mg/kg																
DUP-09	0.5	11/14/2024	<0.220	<0.011	<0.011	<0.011	<0.011	<0.011	<0.011	<0.011	<0.011	<0.011	<0.011	<0.011	<0.011	<0.011	<0.220	<0.011	ND
SB-21-5	5.0	11/14/2024	<0.110	<0.0055	<0.0055	<0.0055	<0.0055	<0.0055	<0.0055	<0.0055	<0.0055	<0.0055	<0.0055	<0.0055	<0.0055	<0.0055	<0.110	<0.0055	ND
SB-21-10	10.0	11/14/2024	<0.096	<0.0048	<0.0048	<0.0048	<0.0048	<0.0048	<0.0048	<0.0048	<0.0048	<0.0048	<0.0048	<0.0048	<0.0048	<0.0048	<0.096	<0.0048	ND
SB-21-15	15.0	11/14/2024	<0.250	<0.012	<0.012	<0.012	<0.012	<0.012	<0.012	<0.012	<0.012	<0.012	<0.012	<0.012	<0.012	<0.012	<0.250	<0.012	ND
SB-22-1	1.0	11/13/2024	<0.079	<0.0039	<0.0039	<0.0039	<0.0039	<0.0039	<0.0039	<0.0039	<0.0039	<0.0039	<0.0039	<0.0039	<0.0039	<0.0039	<0.079	<0.0039	ND
SB-22-5	5.0	11/13/2024	<0.064	<0.0032	<0.0032	<0.0032	<0.0032	<0.0032	<0.0032	<0.0032	<0.0032	<0.0032	<0.0032	<0.0032	<0.0032	<0.0032	<0.064	<0.0032	ND
SB-22-10	10.0	11/13/2024	0.510	<0.0060	<0.0060	<0.0060	<0.0060	<0.0060	<0.0060	<0.0060	<0.0060	<0.0060	<0.0060	<0.0060	<0.0060	<0.0060	0.160	<0.0060	ND
SB-22-13	13.0	11/13/2024	<0.086	<0.0043	<0.0043	<0.0043	<0.0043	<0.0043	<0.0043	<0.0043	<0.0043	<0.0043	<0.0043	<0.0043	<0.0043	<0.0043	<0.086	<0.0043	ND
SB-23-0.5	0.5	11/13/2024	<0.100	<0.0052	<0.0052	<0.0052	<0.0052	<0.0052	<0.0052	<0.0052	<0.0052	<0.0052	<0.0052	<0.0052	<0.0052	<0.0052	<0.100	<0.0052	ND
SB-23-10	10.0	11/13/2024	<0.150	<0.0074	<0.0074	<0.0074	<0.0074	<0.0074	<0.0074	<0.0074	<0.0074	<0.0074	<0.0074	<0.0074	<0.0074	<0.0074	<0.150	<0.0074	ND
SB-24-0.5	0.5	11/15/2024	<0.086	<0.0043	<0.0043	<0.0043	<0.0043	<0.0043	<0.0043	<0.0043	<0.0043	<0.0043	<0.0043	<0.0043	<0.0043	<0.0043	<0.086	<0.0043	ND
SB-24-7	7.0	11/15/2024	<0.067	<0.0033	<0.0033	<0.0033	<0.0033	<0.0033	<0.0033	<0.0033	<0.0033	<0.0033	<0.0033	<0.0033	<0.0033	<0.0033	<0.067	<0.0033	ND
SB-24-9.5	9.5	11/15/2024	<0.110	<0.0057	<0.0057	<0.0057	<0.0057	<0.0057	<0.0057	<0.0057	<0.0057	0.010	6.9	<0.0057	<0.0057	<0.0057	<0.110	<0.0057	ND
SB-24-10.5	10.5	11/15/2024	<0.095	<0.0048	<0.0048	<0.0048	<0.0048	<0.0048	<0.0048	<0.0048	<0.0048	<0.0048	<0.0048	<0.0048	<0.0048	<0.0048	<0.095	<0.0048	ND
SB-25-0.5	0.5	11/14/2024	<0.093	<0.0046	<0.0046	<0.0046	<0.0046	<0.0046	<0.0046	<0.0046	<0.0046	<0.0046	<0.0046	<0.0046	<0.0046	<0.0046	<0.093	<0.0046	ND
SB-25-5	5.0	11/14/2024	<0.120	<0.0059	<0.0059	<0.0059	<0.0059	<0.0059	<0.0059	<0.0059	<0.0059	<0.0059	<0.0059	<0.0059	<0.0059	<0.0059	<0.120	<0.0059	ND
SB-25-10	10.0	11/14/2024	<0.070	<0.0035	<0.0035	<0.0035	<0.0035	<0.0035	<0.0035	<0.0035	<0.0035	<0.0035	<0.0035	<0.0035	<0.0035	<0.0035	<0.070	<0.0035	ND
SB-25-12	12.0	11/14/2024	<0.130	<0.0066	<0.0066	<0.0066	<0.0066	<0.0066	<0.0066	<0.0066	<0.0066	<0.0066	<0.0066	<0.0066	<0.0066	<0.0066	<0.130	<0.0066	ND
SB-26-0.5	0.5	11/14/2024	<0.110	<0.0056	<0.0056	<0.0056	<0.0056	<0.0056	<0.0056	<0.0056	<0.0056	<0.0056	<0.0056	<0.0056	<0.0056	<0.0056	<0.110	<0.0056	ND
SB-26-2	2.0	11/14/2024	<0.100	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	<0.100	<0.0050	ND
DUP-10	2.0	11/14/2024	<0.120	<0.0060	<0.0060	<0.0060	<0.0060	<0.0060	<0.0060	<0.0060	<0.0060	<0.0060	<0.0060	<0.0060	<0.0060	<0.0060	<0.120	<0.0060	ND
SB-26-5	5.0	11/14/2024	<0.074	<0.0037	<0.0037	<0.0037	<0.0037	<0.0037	<0.0037	<0.0037	<0.0037	<0.0037	<0.0037	<0.0037	<0.0037	<0.0037	<0.074	<0.0037	ND
SB-26-7	7.0	11/14/2024	<0.150	<0.0077	<0.0077	<0.0077	<0.0077	<0.0077	<0.0077	<0.0077	<0.0077	<0.0077	<0.0077	<0.0077	<0.0077	<0.0077	<0.150	<0.0077	ND
SB-27-1	1.0	11/14/2024	<0.088	<0.0044	<0.0044	<0.0044	<0.0044	<0.0044	<0.0044	<0.0044	<0.0044	<0.0044	<0.0044	<0.0044	<0.0044	<0.0044	<0.088	<0.0044	ND
SB-27-5	5.0	11/14/2024	<0.210	<0.011	<0.011	<0.011	<0.011	<0.011	<0.011	<0.011	<0.011	<0.011	<0.011	<0.011	<0.011	<0.011	<0.210	<0.011	ND
SB-27-12	12.0	11/14/2024	<0.092	<0.0046	<0.0046	0.0048	<0.0046	<0.0046	<0.0046	<0.0046	<0.0046	<0.0046	0.0063	<0.0046	<0.0046	<0.0046	<0.092	0.0049	ND
SB-27-14	14.0	11/14/2024	<0.085	<0.0043	<0.0043	<0.0043	<0.0043	<0.0043	<0.0043	<0.0043	<0.0043	<0.0043	<0.0043	<0.0043	<0.0043	<0.0043	<0.085	<0.0043	ND
SB-28-0.5	0.5	11/15/2024	<0.150	<0.0074	<0.0074	<0.0074	<0.0074	<0.0074	<0.0074	<0.0074	<0.0074	<0.0074	<0.0074	<0.0074	<0.0074	<0.0074	<0.150	<0.0074	ND
SB-28-5	5.0	11/15/2024	<0.097	<0.0049	<0.0049	<0.0049	<0.0049	<0.0049	<0.0049	<0.0049	<0.0049	<0.0049	<0.0049	<0.0049	<0.0049	<0.0049	<0.097	<0.0049	ND
SB-28-10	10.0	11/15/2024	0.490	<0.0078	<0.0078	<0.0078	<0.0078	<0.0078	<0.0078	<0.0078	<0.0078	<0.0078	<0.0078	<0.0078	<0.0078	<0.0078	0.190	<0.0078	ND
SB-28-14	14.0	11/15/2024	<0.140	<0.0070	<0.0070	<0.0070	<0.0070	<0.0070	<0.0070	<0.0070	<0.0070	<0.0070	<0.0070	<0.0070	<0.0070	<0.0070	<0.140	<0.0070	ND
SB-29-1	1.0	11/15/2024	<0.110	<0.0057	<0.0057	<0.0057	<0.0057	<0.0057	<0.0057	<0.0057	<0.0057	<0.0057	<0.0057	<0.0057	<0.0057	<0.0057	<0.110	<0.0057	ND
SB-29-5	5.0	11/15/2024	<0.120	<0.0060	<0.0060	<0.0060	<0.0060	<0.0060	<0.0060	<0.0060	<0.0060	<0.0060	<0.0060	<0.0060	<0.0060	<0.0060	<0.120	<0.0060	ND
SB-29-10	10.0	11/15/2024	<0.120	<0.0061	<0.0061	<0.0061	<0.0061	<0.0061	<0.0061	<0.0061	<0.0061	<0.0061	<0.0061	<0.0061	<0.0061	<0.0061	<0.120	<0.0061	ND
SB-29-12	12.0	11/15/2024	<0.110	<0.0053	<0.0053	<0.0053	<0.0053	<0.0053	<0.0053	<0.0053	<0.0053	<0.0053	<0.0053	<0.0053	<0.0053	<0.0053	<0.110	<0.0053	ND
SB-30-0.5	0.5	11/15/2024	<0.110	<0.0053	<0.0053	<0.0053	<0.0053	<0.0053	<0.0053	<0.0053	<0.0053	<0.0053	<0.0053	<0.0053	<0.0053	<0.0053	<0.110	<0.0053	ND
DUP-14	0.5	11/15/2024	0.230	<0.0098	<0.0098	<0.0098	<0.0098	<0.0098	<0.0098	<0.0098	<0.0098	<0.0098	<0.0098	<0.0098	<0.0098	<0.0098	<0.200	<0.0098	ND
SB-30-5	5.0	11/16/2024	<0.310	0.017	<0.015	<0.015	<0.015	<0.015	<0.015	<0.015	<0.015	<0.015	<0.015	<0.015	<0.015	<0.015	<0.310	<0.015	ND
SB-30-8	8.0	11/16/2024	<0.170	<0.0083	<0.0083	<0.0083	<0.0083	<0.0083	<0.0083	<0.0083	<0.0083	<0.0083	<0.0083	<0.0083	<0.0083	<0.0083	<0.170	<0.0083	ND
SB-31-1.5	1.5	11/15/2024	<0.088	<0.0044	<0.0044	<0.0044	<0.0044	<0.0044	<0.0044	<0.0044	<0.0044	<0.0044	<0.0044	<0.0044	<0.0044	<0.0044	<0.088	<0.0044	ND
SB-31-5	5.0	11/15/2024	<0.071	<0.0036	<0.0036	<0.0036	<0.0036	<0.0036	<0.0036	<0.0036	<0.0036	<0.0036	<0.0036	<0.0036	<0.0036	<0.0036	<0.071	<0.0036	ND

Table 4 – Soil Analytical Results: Volatile Organic Compounds

Sample ID	Sample Depth (ft bgs)	Date Sampled	Acetone	Benzene	Trichloroethene	4-Methyl-2-Pentanone	Toluene	Ethylbenzene	Isopropylbenzene	Propylbenzene	tert-Butylbenzene	1,2,4-Trimethylbenzene	sec-Butylbenzene	para-Isopropyl Toluene	1,4-Dichlorobenzene	n-Butylbenzene	2-Butanone	Naphthalene	Other VOCs
			mg/kg																
SB-31-10	10.0	11/15/2024	0.290	0.012	<0.0054	<0.0054	0.0089	<0.0054	0.0084	0.0078	<0.0054	0.0078	<0.0054	<0.0054	<0.0054	<0.0054	0.190	<0.0054	ND
SB-31-11.5	11.5	11/15/2024	<0.080	<0.0040	<0.0040	<0.0040	<0.0040	<0.0040	<0.0040	<0.0040	<0.0040	<0.0040	<0.0040	<0.0040	<0.0040	<0.0040	<0.080	<0.0040	ND
SB-32-1	1.0	11/15/2024	<0.120	<0.0060	<0.0060	<0.0060	<0.0060	<0.0060	<0.0060	<0.0060	<0.0060	<0.0060	<0.0060	<0.0060	<0.0060	<0.0060	<0.120	<0.0060	ND
SB-32-5	5.0	11/15/2024	<0.120	<0.0060	<0.0060	<0.0060	<0.0060	<0.0060	<0.0060	<0.0060	<0.0060	<0.0060	<0.0060	<0.0060	<0.0060	<0.0060	<0.120	<0.0060	ND
SB-32-11	11.0	11/15/2024	<0.360	<0.018	<0.018	<0.018	<0.018	<0.018	<0.018	<0.018	<0.018	<0.018	<0.018	<0.018	<0.018	<0.018	<0.360	<0.018	ND
DUP-11	11.0	11/15/2024	<0.320	<0.016	<0.016	<0.016	<0.016	<0.016	<0.016	<0.016	<0.016	<0.016	<0.016	<0.016	<0.016	<0.016	<0.320	<0.016	ND
SB-32-13	13.0	11/15/2024	<0.100	<0.0052	<0.0052	<0.0052	<0.0052	<0.0052	<0.0052	<0.0052	<0.0052	<0.0052	<0.0052	<0.0052	<0.0052	<0.0052	<0.100	<0.0052	ND
SB-33-0.5	0.5	11/14/2024	<0.092	<0.0046	<0.0046	<0.0046	<0.0046	<0.0046	<0.0046	<0.0046	<0.0046	<0.0046	<0.0046	<0.0046	<0.0046	<0.0046	<0.092	<0.0046	ND
SB-33-5	5.0	11/14/2024	<0.180	<0.0089	<0.0089	<0.0089	<0.0089	<0.0089	<0.0089	<0.0089	<0.0089	<0.0089	<0.0089	0.014	<0.0089	<0.0089	<0.180	<0.0089	ND
SB-33-8.5	8.5	11/14/2024	0.160	<0.0056	<0.0056	<0.0056	<0.0056	<0.0056	<0.0056	<0.0056	<0.0056	<0.0056	<0.0056	<0.0056	<0.0056	<0.0056	<0.110	<0.0056	ND
SB-33-9.5	9.5	11/14/2024	<0.110	<0.0055	<0.0055	<0.0055	<0.0055	<0.0055	<0.0055	<0.0055	<0.0055	<0.0055	<0.0055	<0.0055	<0.0055	<0.0055	<0.110	<0.0055	ND
SB-34-0.5	0.5	11/14/2024	<0.078	<0.0039	<0.0039	<0.0039	<0.0039	<0.0039	<0.0039	<0.0039	<0.0039	<0.0039	<0.0039	<0.0039	<0.0039	<0.0039	<0.078	<0.0039	ND
SB-34-1.5	1.5	11/14/2024	<0.110	<0.0054	<0.0054	<0.0054	<0.0054	<0.0054	<0.0054	<0.0054	<0.0054	<0.0054	<0.0054	<0.0054	<0.0054	<0.0054	<0.110	<0.0054	ND
SB-34-4	4.0	11/14/2024	<0.068	<0.0034	<0.0034	<0.0034	<0.0034	<0.0034	<0.0034	<0.0034	<0.0034	<0.0034	<0.0034	<0.0034	<0.0034	<0.0034	<0.068	<0.0034	ND
SB-34-5.5	5.5	11/14/2024	<0.130	<0.0065	<0.0065	<0.0065	<0.0065	<0.0065	<0.0065	<0.0065	<0.0065	<0.0065	<0.0065	<0.0065	<0.0065	<0.0065	<0.130	<0.0065	ND
SB-35-1	1.0	11/15/2024	<0.310	<0.016	<0.016	<0.016	<0.016	<0.016	<0.016	<0.016	<0.016	<0.016	<0.016	<0.016	<0.016	<0.016	<0.310	<0.016	ND
SB-35-6	6.0	11/15/2024	<0.160	<0.0079	<0.0079	<0.0079	<0.0079	<0.0079	<0.0079	<0.0079	<0.0079	<0.0079	<0.0079	<0.0079	<0.0079	<0.0079	<0.160	<0.0079	ND
SB-35-10	10.0	11/15/2024	<0.120	<0.0062	<0.0062	<0.0062	<0.0062	<0.0062	<0.0062	<0.0062	<0.0062	<0.0062	<0.0062	<0.0062	<0.0062	<0.0062	<0.120	0.012	ND
SB-36-1.5	1.5	11/15/2024	<0.069	<0.0034	<0.0034	<0.0034	<0.0034	<0.0034	<0.0034	<0.0034	<0.0034	<0.0034	<0.0034	<0.0034	<0.0034	<0.0034	<0.069	<0.0034	ND
SB-36-4	4.0	11/15/2024	<0.078	<0.0039	<0.0039	<0.0039	<0.0039	<0.0039	<0.0039	<0.0039	<0.0039	<0.0039	<0.0039	<0.0039	<0.0039	<0.0039	<0.078	<0.0039	ND
SB-36-7	7.0	11/15/2024	0.220	<0.0075	<0.0075	<0.0075	<0.0075	<0.0075	<0.0075	<0.0075	<0.0075	<0.0075	<0.0075	<0.0075	<0.0075	<0.0075	<0.150	<0.0075	ND
SB-36-10	10.0	11/15/2024	<0.092	<0.0046	<0.0046	<0.0046	<0.0046	<0.0046	<0.0046	<0.0046	<0.0046	<0.0046	<0.0046	<0.0046	<0.0046	<0.0046	<0.092	0.052	ND
SB-37-0.5	0.5	11/15/2024	<0.230	<0.011	<0.011	<0.011	<0.011	<0.011	<0.011	<0.011	<0.011	<0.011	<0.011	<0.011	<0.011	<0.011	<0.230	<0.011	ND
SB-37-5	5.0	11/15/2024	<0.270	<0.013	<0.013	<0.013	<0.013	<0.013	<0.013	<0.013	<0.013	<0.013	<0.013	<0.013	<0.013	<0.013	<0.270	<0.013	ND
SB-37-10	10.0	11/15/2024	<0.130	0.0094	<0.0063	<0.0063	<0.0063	<0.0063	<0.0063	<0.0063	<0.0063	<0.0063	<0.0063	<0.0063	<0.0063	<0.0063	<0.130	<0.0063	ND
SB-37-12	12.0	11/15/2024	<0.170	<0.0084	<0.0084	<0.0084	<0.0084	<0.0084	<0.0084	<0.0084	<0.0084	<0.0084	<0.0084	<0.0084	<0.0084	<0.0084	<0.170	<0.0084	ND
SB-38-1	1.0	11/15/2024	<0.100	<0.0051	<0.0051	<0.0051	<0.0051	<0.0051	<0.0051	<0.0051	<0.0051	<0.0051	<0.0051	<0.0051	<0.0051	<0.0051	<0.100	<0.0051	ND
SB-38-5	5.0	11/15/2024	<0.068	<0.0034	<0.0034	<0.0034	<0.0034	<0.0034	<0.0034	<0.0034	<0.0034	<0.0034	<0.0034	<0.0034	<0.0034	<0.0034	<0.068	<0.0034	ND
SB-38-10	10.0	11/15/2024	0.220	<0.0069	0.013	<0.0069	<0.0069	<0.0069	<0.0069	<0.0069	<0.0069	<0.0069	<0.0069	<0.0069	0.0073	<0.0069	<0.140	<0.0069	ND
SB-38-12	12.0	11/15/2024	<0.110	<0.0053	<0.0053	<0.0053	<0.0053	<0.0053	<0.0053	<0.0053	<0.0053	<0.0053	<0.0053	<0.0053	<0.0053	<0.0053	<0.110	<0.0053	ND
SB-39-0.5	0.5	11/15/2024	<0.250	<0.012	<0.012	<0.012	<0.012	<0.012	<0.012	<0.012	<0.012	<0.012	<0.012	<0.012	<0.012	<0.012	<0.250	<0.012	ND
SB-39-5	5.0	11/15/2024	<0.330	<0.016	<0.016	<0.016	<0.016	<0.016	<0.016	<0.016	<0.016	<0.016	<0.016	<0.016	<0.016	<0.016	<0.330	<0.016	ND
DUP-13	5.0	11/15/2024	<8.7	<0.430	<0.430	<0.430	<0.430	<0.430	<0.430	<0.430	<0.430	<0.430	<0.430	<0.430	<0.430	<0.430	<8.7	<0.430	ND
SB-39-10	10.0	11/15/2024	<0.170	<0.0085	<0.0085	<0.0085	<0.0085	<0.0085	<0.0085	<0.0085	<0.0085	<0.0085	<0.0085	<0.0085	<0.0085	<0.0085	<0.170	<0.0085	ND
SB-40-0.5	0.5	11/15/2024	<0.074	<0.0037	<0.0037	<0.0037	<0.0037	<0.0037	<0.0037	<0.0037	<0.0037	<0.0037	<0.0037	<0.0037	<0.0037	<0.0037	<0.074	<0.0037	ND
SB-40-5	5.0	11/15/2024	0.410	<0.0080	<0.0080	<0.0080	<0.0080	<0.0080	<0.0080	<0.0080	<0.0080	<0.0080	<0.0080	<0.0080	<0.0080	<0.0080	<0.160	<0.0080	ND
SB-40-6	6.0	11/15/2024	<0.100	<0.0052	<0.0052	<0.0052	<0.0052	<0.0052	<0.0052	<0.0052	<0.0052	<0.0052	<0.0052	<0.0052	<0.0052	<0.0052	<0.100	<0.0052	ND
VP-4-9	9.0	11/12/2024	<0.085	<0.0043	<0.0043	<0.0043	<0.0043	<0.0043	<0.0043	<0.0043	<0.0043	<0.0043	<0.0043	<0.0043	<0.0043	<0.0043	<0.085	<0.0043	ND
SS-1	0-0.5	11/15/2024	<0.087	<0.0044	<0.0044	<0.0044	<0.0044	<0.0044	<0.0044	<0.0044	<0.0044	<0.0044	<0.0044	<0.0044	<0.0044	<0.0044	<0.087	<0.0044	ND
SS-2	0-0.5	11/15/2024	<0.100	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	<0.100	<0.0050	ND
SS-3	0-0.5	11/15/2024	<0.130	<0.0063	<0.0063	<0.0063	<0.0063	<0.0063	<0.0063	<0.0063	<0.0063	<0.0063	<0.0063	<0.0063	<0.0063	<0.0063	<0.130	<0.0063	ND

Table 4 – Soil Analytical Results: Volatile Organic Compounds

Sample ID	Sample Depth (ft bgs)	Date Sampled	Acetone	Benzene	Trichloroethene	4-Methyl-2-Pentanone	Toluene	Ethylbenzene	Isopropylbenzene	Propylbenzene	tert-Butylbenzene	1,2,4-Trimethylbenzene	sec-Butylbenzene	para-Isopropyl Toluene	1,4-Dichlorobenzene	n-Butylbenzene	2-Butanone	Naphthalene	Other VOCs
			mg/kg																
SS-4	0-0.5	11/15/2024	<0.097	<0.0049	<0.0049	<0.0049	<0.0049	<0.0049	<0.0049	<0.0049	<0.0049	<0.0049	<0.0049	<0.0049	<0.0049	<0.0049	<0.097	<0.0049	ND
Trip Blanks (unit in µg/L)																			
TB-11132024 [a]	--	11/13/2024	<21	<0.50	<0.50	<5.0	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<5.0	<2.0	ND
TB-11132024 [b]	--	11/13/2024	<21	<0.50	<0.50	<5.0	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<5.0	<2.0	ND
TB-11132024 [c]	--	11/13/2024	<21	<0.50	<0.50	<5.0	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<5.0	<2.0	0.5 (Chloroform)
TB-11142024 [d]	--	11/14/2024	<21	<0.50	<0.50	<5.0	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<5.0	<2.0	ND
TB-11142024 [e]	--	11/14/2024	<21	<0.50	<0.50	<5.0	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<5.0	<2.0	ND
TB-11152024 [f]	--	11/15/2024	<21	<0.50	<0.50	<5.0	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<5.0	<2.0	ND
TB-11152024 [g]	--	11/15/2024	<21	<0.50	<0.50	<5.0	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<5.0	<2.0	ND
TB-11162024 [h]	--	11/16/2024	<20	<0.50	<0.50	<5.0	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<5.0	<2.0	1.6 (Chloroform
TB-11162024 [i]	--	11/16/2024	<21	<0.50	<0.50	<5.0	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<5.0	<2.0	1.6 (Chloroform
Screening Limits																			
DTSC Residential Soil [1]			NE	0.33	NE	NE	1,100	NE	NE	NE	2,200	NE	2,200	NE	NE	2,400	NE	2	Various
EPA Residential Soil RSL [2]			70,000	1.2	0.94	33,000	4,900	5.8	1,900	3,800	7,800	300	7,800	NE	2.6	3,900	27,000	2	Various

Notes:

ft bgs = feet below ground surface

mg/kg = milligrams per kilogram

ND = Not detected

DTSC = Department of Toxics Substance Control

EPA = United States Environmental Protection Agency

NE = not established

<X = Not detected at or above laboratory reporting limit

-- = not analyzed/not applicable

[a] = Lab ID 520246-006

[b] = Lab ID 520247-017

[c] = Lab ID 520248-018

[d] = Lab ID 520357-023

[e] = Lab ID 520358-024

[f] = Lab ID 520360-028

[g] = Lab ID 520361-025

[h] = Lab ID 520597-022

[i] = Lab ID 520603-007

[1] = Table 1: Human Health Risk Assessment (HHRA) Note 3, June 2020 - Revised May 2022, DTSC-Modified Screening Levels. Where applicable, most conservative value between the cancer and noncancer endpoint used.

[2] = US EPA Regional Screening Levels (RSLs) November 2024 (TR=1E-06 , THQ=1.0)

Table 5 – Soil Analytical Results: Polycyclic Aromatic Hydrocarbons (PAHs)

Sample ID	Sample Depth (ft bgs)	Date Sampled	1-Methylnaphthalene	2-Methylnaphthalene	Naphthalene	Acenaphthylene	Acenaphthene	Fluorene	Phenanthrene	Anthracene	Fluoranthene	Pyrene	Benzo[a]anthracene	Chrysene	Benzo[b]fluoranthene	Benzo[k]fluoranthene	Benzo[a]pyrene	Indeno[1,2,3-cd]pyrene	Dibenz[a,h]anthracene	Benzo[g,h,i]perylene
			mg/kg																	
SB-1-0.5	0.5	11/11/2024	<0.040	<0.040	<0.040	<0.040	<0.040	<0.040	<0.040	<0.040	<0.040	<0.040	<0.040	<0.040	<0.040	<0.040	<0.040	<0.040	<0.040*	<0.040
SB-1-4	4.0	11/11/2024	<0.040	<0.040	<0.040	<0.040	<0.040	<0.040	<0.040	<0.040	<0.040	<0.040	<0.040	<0.040	<0.040	<0.040	<0.040	<0.040	<0.040*	<0.040
SB-1-6	6.0	11/11/2024	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010
SB-2-0.5	0.5	11/11/2024	<0.040	<0.040	<0.040	<0.040	<0.040	<0.040	<0.040	<0.040	<0.040	<0.040	<0.040	<0.040	<0.040	<0.040	<0.040	<0.040	<0.040*	<0.040
SB-2-5	5.0	11/11/2024	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010
SB-2-10	10.0	11/11/2024	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010
SB-2-15	15.0	11/11/2024	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	0.055	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010
SB-3-1.5	1.5	11/12/2024	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050*	<0.050
SB-3-5	5.0	11/12/2024	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010
SB-3-10	10.0	11/12/2024	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010
SB-3-15	15.0	11/12/2024	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010
DUP-01	15.0	11/12/2024	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010
SB-4-0.5	0.5	11/12/2024	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050*	<0.050
SB-4-5	5.0	11/12/2024	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010
SB-4-10	10.0	11/12/2024	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010
SB-4-15	15.0	11/12/2024	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010
SB-5-0.5	0.5	11/12/2024	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010
SB-5-5	5.0	11/12/2024	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010
SB-5-10	10.0	11/12/2024	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010
DUP-02	10.0	11/12/2024	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010
SB-5-15	15.0	11/12/2024	0.061	0.170	0.013	<0.010	<0.010	0.055	0.480	<0.010	0.049	0.050	0.018	0.053	0.022	<0.010	<0.010	<0.010	<0.010	<0.010
SB-6-1.5	1.5	11/12/2024	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099
SB-6-5	5.0	11/12/2024	0.390	0.230	0.120	<0.1	<0.1	0.110	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1*	<0.1
SB-6-7	7.0	11/12/2024	0.011	0.011	0.014	<0.010	<0.010	0.015	0.053	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010
SB-6-9.5	9.5	11/12/2024	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	0.054	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010
SB-7-0.5	0.5	11/11/2024	<2	<2	<2	<2	<2	<2	<2	<2	<2	<2	<2*	<2	<2*	<2	<2*	<2*	<2*	<2
SB-7-5	5.0	11/11/2024	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1*	<0.1
SB-7-7	7.0	11/11/2024	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010
SB-8-0.5	0.5	11/13/2024	<0.2	<0.2	<0.2	<0.2	<0.2	<0.2	<0.2	<0.2	<0.2	<0.2	<0.2	<0.2	<0.2	<0.2	<0.2*	<0.2	<0.2*	<0.2
SB-8-5	5.0	11/13/2024	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010
SB-8-9.5	9.5	11/13/2024	<0.040	<0.040	<0.040	<0.040	<0.040	<0.040	<0.040	<0.040	<0.040	<0.040	<0.040	<0.040	<0.040	<0.040	<0.040	<0.040	<0.040*	<0.040
SB-8-10.5	10.5	11/13/2024	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010
SB-9-0.5	0.5	11/13/2024	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5*	<0.5	<0.5*	<0.5
SB-9-6	6.0	11/13/2024	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010
SB-9-8.5	8.5	11/13/2024	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010
SB-10-1.5	1.5	11/13/2024	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5*	<0.5	<0.5*	<0.5
SB-10-2.5	2.5	11/13/2024	<0.040	<0.040	<0.040	<0.040	<0.040	<0.040	<0.040	<0.040	<0.040	<0.040	<0.040	<0.040	<0.040	<0.040	<0.040	<0.040	<0.040*	<0.040
DUP-05	2.5	11/13/2024	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1*	<0.1
SB-10-6	6.0	11/13/2024	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099

Table 5 – Soil Analytical Results: Polycyclic Aromatic Hydrocarbons (PAHs)

Sample ID	Sample Depth (ft bgs)	Date Sampled	1-Methylnaphthalene	2-Methylnaphthalene	Naphthalene	Acenaphthylene	Acenaphthene	Fluorene	Phenanthrene	Anthracene	Fluoranthene	Pyrene	Benzo[a]anthracene	Chrysene	Benzo[b]fluoranthene	Benzo[k]fluoranthene	Benzo[a]pyrene	Indeno[1,2,3-cd]pyrene	Dibenz[a,h]anthracene	Benzo[g,h,i]perylene
			mg/kg																	
SB-10-9	9.0	11/13/2024	<0.2	<0.2	<0.2	0.380	<0.2	<0.2	0.610	<0.2	1.1	1.9	0.570	0.920	**1.6**	0.540	**1.7**	**1.1**	**0.210**	0.960
SB-10-10	10.0	11/13/2024	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010
SB-11-0.5	0.5	11/13/2024	<0.510	<0.510	<0.510	<0.510	<0.510	<0.510	<0.510	<0.510	<0.510	<0.510	<0.510	<0.510	<0.510	<0.510	<0.510*	<0.510	<0.510*	<0.510
SB-11-5	5.0	11/13/2024	0.020	0.023	0.014	<0.010	<0.010	<0.010	0.027	<0.010	0.024	0.022	0.015	0.017	0.017	<0.010	0.011	<0.010	<0.010	<0.010
SB-11-8	8.0	11/13/2024	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010
SB-11-10	10.0	11/13/2024	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099
SB-12-1.5	1.5	11/14/2024	<2	<2	<2	<2	<2	<2	<2	<2	<2	<2	<2*	<2	<2*	<2	<2*	<2*	<2*	<2
SB-12-2.5	2.5	11/14/2024	<2	<2	<2	<2	<2	<2	<2	<2	<2	<2	<2*	<2	<2*	<2	<2*	<2*	<2*	<2
SB-12-6	6.0	11/14/2024	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010
SB-12-10	10.0	11/14/2024	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1*	<0.1
SB-12-15	15.0	11/14/2024	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010
SB-13-1.5	1.5	11/13/2024	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5*	<0.5	<0.5*	<0.5
SB-13-5	5.0	11/14/2024	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010
SB-13-6.5	6.5	11/14/2024	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099
SB-14-0.5	0.5	11/13/2024	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1*	<0.1
SB-14-2.5	2.5	11/13/2024	<0.010	<0.010	0.014	<0.010	<0.010	<0.010	0.015	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010
SB-14-5	5.0	11/14/2024	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0*	<1.0	<1.0*	<1.0
SB-14-6.5	6.5	11/14/2024	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010
SB-14-9	9.0	11/14/2024	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010
SB-15-0.5	0.5	11/14/2024	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5*	<0.5	<0.5*	<0.5
SB-16-0.5	0.5	11/13/2024	<0.510	<0.510	<0.510	<0.510	<0.510	<0.510	<0.510	<0.510	<0.510	<0.510	<0.510	<0.510	<0.510	<0.510	<0.510*	<0.510	<0.510*	<0.510
SB-16-5	5.0	11/13/2024	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010
DUP-06	5.0	11/13/2024	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010
SB-16-10	10.0	11/13/2024	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099
SB-16-15	15.0	11/13/2024	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010
SB-17-0.5	0.5	11/13/2024	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0*	<1.0	<1.0*	<1.0
SB-17-2.5	2.5	11/13/2024	<0.250	<0.250	<0.250	<0.250	<0.250	<0.250	<0.250	<0.250	<0.250	<0.250	<0.250	<0.250	<0.250	<0.250	<0.250*	<0.250	<0.250*	<0.250
SB-17-7	7.0	11/13/2024	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010
SB-17-10	10.0	11/13/2024	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010
SB-18-1	1.0	11/14/2024	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1*	<0.1
SB-18-6	6.0	11/14/2024	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010
SB-18-12	12.0	11/14/2024	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010
SB-18-16	16.0	11/14/2024	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010
SB-19-0.5	0.5	11/14/2024	<0.510	<0.510	<0.510	<0.510	<0.510	<0.510	<0.510	<0.510	<0.510	<0.510	<0.510	<0.510	<0.510	<0.510	<0.510*	<0.510	<0.510*	<0.510
SB-19-4	4.0	11/14/2024	<0.510	<0.510	<0.510	<0.510	<0.510	<0.510	<0.510	<0.510	<0.510	<0.510	<0.510	<0.510	<0.510	<0.510	<0.510*	<0.510	<0.510*	<0.510
SB-19-10	10.0	11/14/2024	<0.010	<0.010	0.016	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010
SB-19-12	12.0	11/14/2024	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010
SB-20-1	1.0	11/14/2024	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0*	<2.0	<2.0*	<2.0	<2.0*	<2.0*	<2.0*	<2.0
SB-20-5	5.0	11/14/2024	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010

Table 5 – Soil Analytical Results: Polycyclic Aromatic Hydrocarbons (PAHs)

Sample ID	Sample Depth (ft bgs)	Date Sampled	1-Methylnaphthalene	2-Methylnaphthalene	Naphthalene	Acenaphthylene	Acenaphthene	Fluorene	Phenanthrene	Anthracene	Fluoranthene	Pyrene	Benzo[a]anthracene	Chrysene	Benzo[b]fluoranthene	Benzo[k]fluoranthene	Benzo[a]pyrene	Indeno[1,2,3-cd]pyrene	Dibenz[a,h]anthracene	Benzo[g,h,i]perylene
			mg/kg																	
SB-20-10	10.0	11/14/2024	<0.010	<0.010	0.020	<0.010	<0.010	<0.010	0.017	<0.010	0.019	0.029	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	0.020
SB-20-12	12.0	11/14/2024	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010
SB-21-0.5	0.5	11/14/2024	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0*	<2.0	<2.0*	<2.0	<2.0*	<2.0*	<2.0*	<2.0
DUP-09	0.5	11/14/2024	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0*	<2.0	<2.0*	<2.0	<2.0*	<2.0*	<2.0*	<2.0
SB-21-5	5.0	11/14/2024	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010
SB-21-10	10.0	11/14/2024	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	0.012	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099
SB-21-15	15.0	11/14/2024	0.021	0.022	0.013	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010
SB-22-1	1.0	11/13/2024	<0.990	<0.990	<0.990	<0.990	<0.990	<0.990	<0.990	<0.990	<0.990	<0.990	<0.990	<0.990	<0.990	<0.990	<0.990*	<0.990	<0.990*	<0.990
SB-22-5	5.0	11/13/2024	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099
SB-22-10	10.0	11/13/2024	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099
SB-22-13	13.0	11/13/2024	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010
SB-23-0.5	0.5	11/13/2024	<0.500	<0.500	<0.500	<0.500	<0.500	<0.500	<0.500	<0.500	<0.500	<0.500	<0.500	<0.500	<0.500	<0.500	<0.500*	<0.500	<0.500*	<0.500
SB-23-10	10.0	11/13/2024	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099
SB-24-0.5	0.5	11/15/2024	<0.020	<0.020	<0.020	<0.020	<0.020	<0.020	<0.020	<0.020	<0.020	<0.020	<0.020	<0.020	<0.020	<0.020	<0.020	<0.020	<0.020	<0.020
SB-24-7	7.0	11/15/2024	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010
SB-24-9.5	9.5	11/15/2024	<0.010	<0.010	0.014	<0.010	<0.010	<0.010	0.015	<0.010	0.011	0.013	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010
SB-24-10.5	10.5	11/15/2024	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010
SB-25-0.5	0.5	11/14/2024	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0*	<2.0	<2.0*	<2.0	<2.0*	<2.0*	<2.0*	<2.0
SB-25-5	5.0	11/14/2024	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	0.013	<0.010	0.018	0.018	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010
SB-25-10	10.0	11/14/2024	<0.020	<0.020	0.056	<0.020	<0.020	<0.020	<0.020	<0.020	<0.020	<0.020	<0.020	<0.020	<0.020	<0.020	<0.020	<0.020	<0.020	<0.020
SB-25-12	12.0	11/14/2024	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010
SB-26-0.5	0.5	11/14/2024	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010
SB-26-2	2.0	11/14/2024	<0.500	<0.500	<0.500	<0.500	<0.500	<0.500	<0.500	<0.500	<0.500	<0.500	<0.500	<0.500	<0.500	<0.500	<0.500*	<0.500	<0.500*	<0.500
DUP-10	2.0	11/14/2024	<0.200	<0.200	<0.200	<0.200	<0.200	<0.200	<0.200	<0.200	<0.200	<0.200	<0.200	<0.200	<0.200	<0.200	<0.200*	<0.200	<0.200*	<0.200
SB-26-5	5.0	11/14/2024	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010
SB-26-7	7.0	11/14/2024	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010
SB-27-1	1.0	11/14/2024	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010
SB-27-5	5.0	11/14/2024	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010
SB-27-12	12.0	11/14/2024	<0.100	0.140	0.200	<0.100	<0.100	<0.100	<0.100	<0.100	<0.100	<0.100	<0.100	<0.100	<0.100	<0.100	<0.100	<0.100	<0.100	<0.100
SB-27-14	14.0	11/14/2024	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010
SB-28-0.5	0.5	11/15/2024	<0.500	<0.500	<0.500	<0.500	<0.500	<0.500	<0.500	<0.500	<0.500	<0.500	<0.500	<0.500	<0.500	<0.500	<0.500*	<0.500	<0.500*	<0.500
SB-28-5	5.0	11/15/2024	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010
SB-28-10	10.0	11/15/2024	<0.010	<0.010	0.097	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010
SB-28-14	14.0	11/15/2024	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010
SB-29-1	1.0	11/15/2024	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010
SB-29-5	5.0	11/15/2024	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010
SB-29-10	10.0	11/15/2024	<12*	<12	<12*	<12	<12	<12	<12	<12	<12	<12	<12*	<12	<12*	<12*	<12*	<12*	<12*	<12
SB-29-12	12.0	11/15/2024	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099
SB-30-0.5	0.5	11/15/2024	<0.100	<0.100	<0.100	<0.100	<0.100	<0.100	<0.100	<0.100	<0.100	<0.100	<0.100	<0.100	<0.100	<0.100	<0.100	<0.100	<0.100*	<0.100

Table 5 – Soil Analytical Results: Polycyclic Aromatic Hydrocarbons (PAHs)

Sample ID	Sample Depth (ft bgs)	Date Sampled	1-Methylnaphthalene	2-Methylnaphthalene	Naphthalene	Acenaphthylene	Acenaphthene	Fluorene	Phenanthrene	Anthracene	Fluoranthene	Pyrene	Benzo[a]anthracene	Chrysene	Benzo[b]fluoranthene	Benzo[k]fluoranthene	Benzo[a]pyrene	Indeno[1,2,3-cd]pyrene	Dibenz[a,h]anthracene	Benzo[g,h,i]perylene
			mg/kg																	
DUP-14	0.5	11/15/2024	<0.100	<0.100	<0.100	<0.100	<0.100	<0.100	<0.100	<0.100	<0.100	<0.100	<0.100	<0.100	<0.100	<0.100	<0.100	<0.100	<0.100*	<0.100
SB-30-5	5.0	11/16/2024	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0*	<1.0	<1.0*	<1.0
SB-30-8	8.0	11/16/2024	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010
SB-31-1.5	1.5	11/15/2024	<0.200	<0.200	<0.200	<0.200	<0.200	<0.200	<0.200	<0.200	<0.200	<0.200	<0.200	<0.200	<0.200	<0.200	<0.200*	<0.200	<0.200*	<0.200
SB-31-5	5.0	11/15/2024	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099
SB-31-10	10.0	11/15/2024	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	0.014	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010
SB-31-11.5	11.5	11/15/2024	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010
SB-32-1	1.0	11/15/2024	<0.250	<0.250	<0.250	<0.250	<0.250	<0.250	<0.250	<0.250	<0.250	<0.250	<0.250	<0.250	<0.250	<0.250	<0.250*	<0.250	<0.250*	<0.250
SB-32-5	5.0	11/15/2024	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010
SB-32-11	11.0	11/15/2024	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099
DUP-11	11.0	11/15/2024	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	0.010	0.014	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010
SB-32-13	13.0	11/15/2024	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010
SB-33-0.5	0.5	11/14/2024	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010
SB-33-5	5.0	11/14/2024	<0.100	<0.100	<0.100	<0.100	<0.100	<0.100	<0.100	<0.100	<0.100	<0.100	<0.100	<0.100	<0.100	<0.100	<0.100	<0.100	<0.100*	<0.100
SB-33-8.5	8.5	11/14/2024	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099
SB-33-9.5	9.5	11/14/2024	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010
SB-34-0.5	0.5	11/14/2024	<0.100	<0.100	<0.100	<0.100	<0.100	<0.100	<0.100	<0.100	<0.100	<0.100	<0.100	<0.100	<0.100	<0.100	<0.100	<0.100	<0.100*	<0.100
SB-34-1.5	1.5	11/14/2024	<0.100	<0.100	<0.100	<0.100	<0.100	<0.100	<0.100	<0.100	<0.100	<0.100	<0.100	<0.100	<0.100	<0.100	<0.100	<0.100	<0.100*	<0.100
SB-34-4	4.0	11/14/2024	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010
SB-34-5.5	5.5	11/14/2024	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010
SB-35-1	1.0	11/15/2024	<0.500	<0.500	<0.500	<0.500	<0.500	<0.500	<0.500	<0.500	<0.500	<0.500	<0.500	<0.500	<0.500	<0.500	<0.500*	<0.500	<0.500*	<0.500
SB-35-6	6.0	11/15/2024	<0.010	<0.010	0.055	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010
SB-35-10	10.0	11/15/2024	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	0.011	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010
SB-36-1.5	1.5	11/15/2024	<0.200	<0.200	<0.200	<0.200	<0.200	<0.200	<0.200	<0.200	<0.200	<0.200	<0.200	<0.200	<0.200	<0.200	<0.200*	<0.200	<0.200*	<0.200
SB-36-4	4.0	11/15/2024	<0.040	<0.040	<0.040	<0.040	<0.040	<0.040	<0.040	<0.040	<0.040	<0.040	<0.040	<0.040	<0.040	<0.040	<0.040	<0.040	<0.040*	<0.040
SB-36-7	7.0	11/15/2024	<0.019	0.051	0.16	<0.019	<0.019	0.028	0.340	0.026	0.440	0.450	0.180	0.360	0.150	0.035	0.047	0.047	0.025	0.100
SB-36-10	10.0	11/15/2024	<0.010	<0.010	0.014	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010
SB-37-0.5	0.5	11/15/2024	<0.100	<0.100	<0.100	<0.100	<0.100	<0.100	<0.100	<0.100	<0.100	<0.100	<0.100	<0.100	<0.100	<0.100	<0.100	<0.100	<0.100*	<0.100
SB-37-5	5.0	11/15/2024	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	0.012	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010
SB-37-10	10.0	11/15/2024	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010
SB-37-12	12.0	11/15/2024	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010
SB-38-1	1.0	11/15/2024	<0.250	<0.250	<0.250	<0.250	<0.250	<0.250	<0.250	<0.250	<0.250	<0.250	<0.250	<0.250	<0.250	<0.250	<0.250*	<0.250	<0.250*	<0.250
SB-38-5	5.0	11/15/2024	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010
SB-38-10	10.0	11/15/2024	<0.020	<0.020	<0.020	<0.020	<0.020	<0.020	0.060	<0.020	<0.020	0.024	<0.020	<0.020	<0.020	<0.020	<0.020	<0.020	<0.020	<0.020
SB-38-12	12.0	11/15/2024	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010
SB-39-0.5	0.5	11/15/2024	<0.500	<0.500	<0.500	<0.500	<0.500	<0.500	<0.500	<0.500	<0.500	<0.500	<0.500	<0.500	<0.500	<0.500	<0.500*	<0.500	<0.500*	<0.500
SB-39-5	5.0	11/15/2024	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010
DUP-13	5.0	11/15/2024	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099	<0.0099
SB-39-10	10.0	11/15/2024	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010

Table 5 – Soil Analytical Results: Polycyclic Aromatic Hydrocarbons (PAHs)

Sample ID	Sample Depth (ft bgs)	Date Sampled	1-Methylnaphthalene	2-Methylnaphthalene	Naphthalene	Acenaphthylene	Acenaphthene	Fluorene	Phenanthrene	Anthracene	Fluoranthene	Pyrene	Benzo[a]anthracene	Chrysene	Benzo[b]fluoranthene	Benzo[k]fluoranthene	Benzo[a]pyrene	Indeno[1,2,3-cd]pyrene	Dibenz[a,h]anthracene	Benzo[g,h,i]perylene
			mg/kg																	
SB-40-0.5	0.5	11/15/2024	<0.100	<0.100	<0.100	<0.100	<0.100	<0.100	<0.100	<0.100	<0.100	<0.100	<0.100	<0.100	<0.100	<0.100	<0.100	<0.100	<0.100*	<0.100
SB-40-5	5.0	11/15/2024	<0.200	<0.200	<0.200	<0.200	<0.200	<0.200	<0.200	<0.200	<0.200	<0.200	<0.200	<0.200	<0.200	<0.200	<0.200*	<0.200	<0.200*	<0.200
SB-40-6	6.0	11/15/2024	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010
VP-4-9	9.0	11/12/2024	0.085	0.130	0.034	<0.010	<0.010	0.020	0.083	<0.010	<0.010	0.014	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010
SS-1	0-0.5	11/15/2024	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010
SS-2	0-0.5	11/15/2024	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010
SS-3	0-0.5	11/15/2024	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010
SS-4	0-0.5	11/15/2024	<0.020	<0.020	<0.020	<0.020	<0.020	<0.020	<0.020	<0.020	<0.020	<0.020	<0.020	<0.020	<0.020	<0.020	<0.020	<0.020	<0.020	<0.020
Screening Levels																				
DTSC Residential Soil [1]			9.9	190	2	NE	3,300	2,300	NE	17,000	2,400	1,800	1.1	110	1.1	11	0.11	1.1	0.028	NE
EPA Residential Soil RSL [2]			0.18	240	2	NE	3,600	2,400	NE	18,000	2,400	1,800	1.1	110	1.1	11	0.11	1.1	0.11	NE

Notes:

ft bgs = feet below ground surface

mg/kg = milligrams per kilogram

<X = Not detected at or above laboratory reporting limit

PAHs analyzed by United States Environmental Protection Agency (EPA) Method 8270C-SIM

NE = Screening level not established

DTSC = Department of Toxics Substance Control

EPA = United States Environmental Protection Agency

* = Sample was not detected above laboratory reporting limit. However, sample diluted due to dark and viscous nature of sample extract, resulting in reporting limit elevated above screeening level.

[1] = Table 1: Human Health Risk Assessment (HHRA) Note 3, June 2020 - Revised May 2022, DTSC-Modified Screening Levels. Where applicable, most conservative value between the cancer and noncancer endpoint used.

[2] = US EPA Regional Screening Levels (RSLs) November 2024 (TR=1E-06 , THQ=1.0)

Table 6 – Soil Analytical Results: Organochlorine Pesticides (OCPs) and Polychlorinated Biphenyls (PCBs)

Sample ID	Sample Depth (ft bgs)	Date Sampled	OCPs				PCBs								
			4,4'-DDT	4,4'-DDD	Chlordane	Other OCPs	Aroclor - 1016	Aroclor - 1221	Aroclor - 1232	Aroclor - 1242	Aroclor - 1248	Aroclor - 1254	Aroclor - 1260	Aroclor - 1262	Aroclor - 1268
			mg/kg												
SB-12-1.5	1.5	11/14/2024	<0.025	<0.025	<0.250	ND	<0.098	<0.098	<0.098	<0.098	<0.098	<0.098	<0.098	<0.098	<0.098
SB-12-2.5	2.5	11/14/2024	<0.025	<0.025	<0.250	ND	<0.099	<0.099	<0.099	<0.099	<0.099	<0.099	<0.099	<0.099	<0.099
SB-14-0.5	0.5	11/13/2024	<0.0098	<0.0098	<0.098	ND	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049
SB-14-2.5	2.5	11/13/2024	<0.0099	<0.0099	<0.099	ND	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050
DUP-07	2.5	11/13/2024	<0.025	<0.025	<0.250	ND	<0.099	<0.099	<0.099	<0.099	<0.099	<0.099	<0.099	<0.099	<0.099
SB-15-0.5	0.5	11/14/2024	<0.0098	<0.0098	<0.098	ND	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049
SB-15-2.5	2.5	11/14/2024	<0.0050	<0.0050	<0.050	ND	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050
SB-17-0.5	0.5	11/13/2024	<0.025	<0.025	<0.250	ND	<0.099	<0.099	<0.099	<0.099	<0.099	<0.099	<0.099	<0.099	<0.099
SB-17-2.5	2.5	11/13/2024	<0.025	<0.025	<0.250	ND	<0.098	<0.098	<0.098	<0.098	<0.098	<0.098	<0.098	<0.098	<0.098
SB-22-1	1.0	11/13/2024	<0.025	<0.025	<0.250	ND	<0.100	<0.100	<0.100	<0.100	<0.100	<0.100	<0.100	<0.100	<0.100
SB-22-2.5	2.5	11/13/2024	<0.0098	<0.0098	<0.098	ND	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049
SB-23-2.5	2.5	11/13/2024	<0.010	0.014	<0.100	ND	<0.050	<0.050	<0.050	<0.050	0.140	<0.050	<0.050	<0.050	<0.050
SB-24-0.5	0.5	11/15/2024	<0.010	<0.010	<0.100	ND	<0.051	<0.051	<0.051	<0.051	<0.051	<0.051	<0.051	<0.051	<0.051
SB-24-2.5	2.5	11/15/2024	<0.010	<0.010	<0.100	ND	<0.051	<0.051	<0.051	<0.051	<0.051	<0.051	0.068	<0.051	0.071
DUP-12	2.5	11/15/2024	<0.050	<0.050	<0.500	ND	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	0.098	<0.050	<0.050
SB-25-0.5	0.5	11/14/2024	<0.025	<0.025	<0.250	ND	<0.100	<0.100	<0.100	<0.100	<0.100	<0.100	<0.100	<0.100	<0.100
SB-25-2.5	2.5	11/14/2024	<0.010	<0.010	<0.100	ND	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050
SB-27-1	1.0	11/14/2024	<0.025	<0.025	<0.250	ND	<0.098	<0.098	<0.098	<0.098	<0.098	<0.098	<0.098	<0.098	<0.098
SB-27-2.5	2.5	11/14/2024	<0.025	<0.025	<0.250	ND	<0.099	<0.099	<0.099	<0.099	<0.099	<0.099	<0.099	<0.099	<0.099
SB-29-2.5	2.5	11/15/2024	<0.025	<0.025	<0.250	ND	<0.100	<0.100	<0.100	<0.100	<0.100	<0.100	<0.100	<0.100	<0.100
SB-41-0.5	0.5	11/12/2024	0.015	<0.0098	<0.098	ND	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049
SB-41-2.5	2.5	11/12/2024	<0.005	<0.005	<0.050	ND	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05
SB-42-0.5	0.5	11/12/2024	<0.005	<0.005	<0.050	ND	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05
SB-42-2.5	2.5	11/12/2024	<0.0099	<0.0099	<0.099	ND	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05
DUP-03	2.5	11/12/2024	<0.010	<0.010	<0.100	ND	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05
SB-43-0.5	0.5	11/12/2024	<0.010	<0.010	<0.100	ND	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05
SB-43-2.5	2.5	11/12/2024	<0.0099	<0.0099	<0.099	ND	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05
SB-44-0.5	0.5	11/12/2024	<0.025	<0.025	<0.250	ND	<0.099	<0.099	<0.099	<0.099	<0.099	<0.099	<0.099	<0.099	<0.099
SB-44-2	2.0	11/12/2024	<0.025	<0.025	0.300	ND	<0.100	<0.100	<0.100	<0.100	<0.100	<0.100	<0.100	<0.100	<0.100
Screening Levels															
DTSC Residential Soil [1]			1.9	1.9	1.7	Various	4	0.2	0.17	0.23	0.23	0.24	0.24	NE	NE
EPA Residential Soil RSL [2]			1.9	2.3	1.7	Various	4.1	0.2	0.17	0.23	0.23	0.24	0.24	NE	NE

Notes:

ft bgs = feet below ground surface

mg/kg = milligrams per kilogram

ND = Not detected

NE = not established

DTSC = Department of Toxics Substance Control

EPA = United States Environmental Protection Agency

<X = Not detected at or above laboratory reporting limit

[1] = Table 1: Human Health Risk Assessment (HHRA) Note 3, June 2020 - Revised May 2022, DTSC-Modified Screening Levels. Most conservative screening level used.

[2] = EPA Regional Screening Levels (RSLs) November 2024 (TR=1E-06 , THQ=1.0)

Table 7 – Soil Analytical Results - Dioxins

Sample ID	Sample Depth (ft bgs)	Date Sampled	2,3,7,8-TCDD	1,2,3,7,8-PeCDD	1,2,3,4,7,8-HxCDD	1,2,3,6,7,8-HxCDD	1,2,3,7,8,9-HxCDD	1,2,3,4,6,7,8-HpCDD	OCDD	2,3,7,8-TCDF	1,2,3,7,8-PeCDF	2,3,4,7,8-PeCDF	1,2,3,4,7,8-HxCDF	1,2,3,6,7,8-HxCDF	2,3,4,6,7,8-HxCDF	1,2,3,7,8,9-HxCDF	1,2,3,4,6,7,8-HpCDF	1,2,3,4,7,8,9-HpCDF	OCDF	Total TCDD	Total PeCDD	Total HxCDD	Total HpCDD	Total TCDF	Total PeCDF	Total HxCDF	Total HpCDF	Dioxin-TEQ[1]
			pg/g																									
SB-1-0.5	0.5	11/11/2024	<0.496	0.513 J	0.703 J	2.65	1.62 J	85.2	1,350	0.348 J	0.901 J,P	1.20 J	0.597 J	0.739 J	0.658 J	0.225 J	10.3	0.583 J	39.7	0.485 J	1.40 J	**25.8**	286	13.6	44.6	22.7	37.3	3.03
SB-1-5	5.0	11/11/2024	<0.499	<2.50	<2.50	0.252 J	<2.50	2.43 J	22.6	0.185 J	0.693 J, P	3.07	<2.50	0.491 J	0.402 J	<2.50	0.809 J	<2.50	1.20 J	0.167 J	0.220 J	0.968 J	4.96	15.7	54.5	15.9	2.26 J	1.11
SB-3-1.5	1.5	11/12/2024	<0.496	<2.48	<2.48	<2.48	<2.48	2.22 J	15.9	<0.496	<2.48	0.122 J	0.0549 J	0.108 J	0.0565 J	0.0700 J	0.212 J	<2.48	0.507 J	0.0743 J	<2.48	0.281 J	5.59	2.06	1.25 J	0.573 J	0.636 J	0.0948
SB-3-10	10.0	11/12/2024	<0.500	<2.50	<2.50	<2.50	<2.50	0.131 J	0.370 J	<0.500	<2.50	<2.50	<2.50	<2.50	<2.50	<2.50	<2.50	<2.50	<5.00	<0.500	<2.50	<2.50	0.131 J	<0.500	<2.50	<2.50	<2.50	0.00142
SB-8-0.5	0.5	11/13/2024	<0.496	0.555 J	0.507 J	2.86	1.62 J	85.0	1,160	<0.496	0.781 J,P	1.26 J	0.669 J	0.674 J	0.566 J	0.194 J	12.8	0.815 J	50.0	0.818	0.766 J	**19.7**	155	7.33	18.4	18.5	43.4	3.01
SB-8-9.5	9.5	11/13/2024	<0.499	<2.50	0.427 J	1.52 J	1.08 J	27.8	281	1.76	3.14 P	13.7	1.32 J	3.34	4.61	0.365 J	10.1	0.627 J	13.9	3.89	3.70	**18.6**	53.9	154	290	88.9	24.4	6.12
SB-13-1.5	1.5	11/13/2024	2.95	5.73	5.90	110	40.4	10,300*	65,600*	--	--	--	--	--	--	--	--	--	--	194	293	**903**	14,600	--	--	--	--	**147**
SB-13-5	5.0	11/14/2024	<0.481	<2.41	<2.41	<2.41	0.875 J	97.8	1,220	--	--	--	--	--	--	--	--	--	--	4.35	3.59	**13.7**	183	--	--	--	--	1.43
SB-16-0.5	0.5	11/13/2024	<0.498	<2.49	<2.49	<2.49	<2.49	16.7	190	0.740	0.859 J	1.19 J	0.747 J	0.879 J	0.393 J	<2.49	3.29	<2.49	6.16	<0.498	<2.49	2.12 J	33.1	1.93	7.17	5.99	8.76	0.916
SB-16-10	10.0	11/13/2024	<0.497	<2.49	<2.49	<2.49	<2.49	0.386 J	2.21 J	0.0695 J	<2.49	<2.49	0.0632 J	<2.49	<2.49	<2.49	<2.49	<2.49	0.210 J	<0.497	<2.49	<2.49	0.579 J	0.364 J	<2.49	0.0632 J	<2.49	0.0179
SB-17-7	7.0	11/13/2024	<0.497	<2.49	<2.49	3.84	1.25 J	104	1,830	2.71	4.70 P	4.44	2.75	12.6	1.71 J	0.872 J	86.7	2.45 J	48.5	8.57	6.25	**45.7**	279	77.7	66.3	85.1	181	6.54
SB-18-1	1.0	11/14/2024	<0.490	<2.45	<2.45	0.424 J	0.210 J	10.0	122	--	--	--	--	--	--	--	--	--	--	0.161 J	<2.45	0.633 J	17.5	--	--	--	--	0.200
SB-18-12	12.0	11/14/2024	<0.495	<2.47	<2.47	<2.47	0.191 J	5.65	42.3	--	--	--	--	--	--	--	--	--	--	0.120 J	0.405 J	2.48	16.6	--	--	--	--	0.0883
SB-20-1	1.0	11/14/2024	<0.497	<2.49	<2.49	1.20 J	<2.49	32.4	339	--	--	--	--	--	--	--	--	--	--	<0.497	0.249 J	4.06	63.7	--	--	--	--	0.546
SB-20-5	5.0	11/14/2024	<0.486	<2.43	<2.43	<2.43	0.366 J	<2.43	3.05 J	--	--	--	--	--	--	--	--	--	--	<0.486	<2.43	0.366 J	0.516 J	--	--	--	--	0.0375
SB-22-10	10.0	11/13/2024	<2.50 D	2.05 D,J	<12.5 D	116 D	28.4 D	3,940 D	66,100 D	3.85 D	16.8 D,P	21.9 D	22.0 D	99.3 D	35.7 D	9.58 D,J	1,870 D	26.7 D	645 D	13.8	111	**2,180**	9,210	76.4	221	1,650	4,050	**119**
SB-23-0.5	0.5	11/13/2024	<0.499	0.435 J	<2.49	2.89	1.30 J	108	1,410	1.32	1.09 J	1.75 J	1.01 J	0.756 J	0.733 J	<2.49	21.0	0.605 J	26.7	0.723	1.63 J	**24.6**	271	14.0	27.3	26.8	54.9	3.52
SB-23-2.5	2.5	11/13/2024	<0.496	0.716 J	<2.48	4.25	2.47 J	214	2,460	1.03	1.67 J,P	7.37	1.48 J	1.88 J	1.14 J	<2.48	39.8	1.34 J	45.9	3.11	5.52	**55.3**	454	48.2	139	76.6	109	7.51
SB-25-0.5	0.5	11/14/2024	<0.492	<2.46	<2.46	1.75 J	0.965 J	70.4	1,000	--	--	--	--	--	--	--	--	--	--	0.457 J	2.79	**11.9**	143	--	--	--	--	1.28
SB-25-10	10.0	11/14/2024	<0.488	<2.44	<2.44	6.05	2.49	256	3,850	--	--	--	--	--	--	--	--	--	--	1.58	4.30	**50.1**	568	--	--	--	--	4.57
SB-28-0.5	0.5	11/15/2024	<0.499	<2.49	<2.49	<2.49	<2.49	1.66 J	11	--	--	--	--	--	--	--	--	--	--	<0.499	0.284 J	<2.49	3.89	--	--	--	--	0.0199
SB-28-5	5.0	11/15/2024	<0.493	<2.46	<2.46	<2.46	<2.46	19.2	203	--	--	--	--	--	--	--	--	--	--	<0.493	<2.46	5.61	39.9	--	--	--	--	0.253
SB-33-0.5	0.5	11/14/2024	<0.485	<2.42	<2.42	1.40 J	0.992 J	31.1	372	--	--	--	--	--	--	--	--	--	--	1.04	1.69 J	8.59	63.4	--	--	--	--	0.662
SB-33-8.5	8.5	11/14/2024	3.09	12.3	9.57	46.7	41.4	684	2,430	--	--	--	--	--	--	--	--	--	--	172	249	**520**	1,290	--	--	--	--	32.8
SB-34-0.5	0.5	11/14/2024	<0.494	<2.47	<2.47	2.34 J	1.21 J	60.3	653	--	--	--	--	--	--	--	--	--	--	2.27	3.61	**17.3**	118	--	--	--	--	1.15
SB-34-4	4.0	11/14/2024	<0.495	<2.47	<2.47	0.460 J	0.116 J	12.7	114	--	--	--	--	--	--	--	--	--	--	0.891	0.490 J	1.51 J	22.1	--	--	--	--	0.219
SB-36-1.5	1.5	11/15/2024	<0.500	<2.50	<2.50	<2.50	<2.50	1.95 J	30.4	--	--	--	--	--	--	--	--	--	--	<0.500	<2.50	0.152 J	3.8	--	--	--	--	0.0286
SB-36-7	7.0	11/15/2024	1.89	4.10	1.92 J	19.2	8.37	1,170	22,600 D	--	--	--	--	--	--	--	--	--	--	39.6	75.2	**266**	2,400	--	--	--	--	27.5
SB-39-0.5	0.5	11/15/2024	<0.490	<2.45	<2.45	<2.45	<2.45	0.510 J	3.65 J	--	--	--	--	--	--	--	--	--	--	<0.490	<2.45	0.116 J	0.982 J	--	--	--	--	0.00620
SB-39-10	10.0	11/15/2024	<0.393	<1.96	<1.96	0.475 J	<1.96	22.1	358	--	--	--	--	--	--	--	--	--	--	0.576	<1.96	6.75	56.5	--	--	--	--	0.376
SB-40-0.5	0.5	11/15/2024	<0.494	<2.47	<2.47	1.81 J	1.27 J	57.7	674	--	--	--	--	--	--	--	--	--	--	4.47	4.70	**19.2**	116	--	--	--	--	1.09
SB-40-5	5.0	11/15/2024	**16.8**	5.28	4.71	62.3	15.4	5,740	84,400	--	--	--	--	--	--	--	--	--	--	139	189	**1,230**	13,400	--	--	--	--	**113**
SB-41-0.5	0.5	11/12/2024	<0.500	1.14 J	<2.50	7.52	5.72	160	1,550	0.274 J	1.01 J,P	1.34 J	0.901 J	<2.50	1.07 J	<2.50	18.4	<2.50	35.5	0.177 J	4.93	**63.7**	329	4.49	21.7	22.6	43.9	5.38
SB-41-2.5	2.5	11/12/2024	<0.499	<2.49	0.258 J	0.483 J	0.399 J	6.84	49.7	<0.499	<2.49	0.138 J	<2.49	<2.49	0.112 J	<2.49	0.695 J	<2.49	0.797 J	<0.499	<2.49	4.58	14.9	0.355 J	0.919 J	1.29 J	1.24 J	0.257
SB-43-0.5	0.5	11/12/2024	1.08	6.34	15.6	45.9	33.8	748	5,870	0.650	2.35 J	4.15	4.85	6.69	5.74	0.795 J	82.9	3.09	77.7	2.65	30.0	**451**	2,180	11.6	66.5	108	147	30.3
SB-43-2.5	2.5	11/12/2024	<0.500	<2.50	<2.50	1.14 J	0.965 J	18.8	154	0.238 J	0.999 J,P	1.40 J	0.239 J	0.320 J	0.463 J	0.143 J	2.21 J	0.143 J	2.49 J	0.273 J	<2.50	9.98	40.8	4.82	17.4	8.37	4.56	1.06
SB-44-0.5	0.5	11/12/2024	<0.500	0.446 J	0.365 J	1.38 J	0.882 J	28.5	293	0.279 J	0.569 J	2.42 J	0.457 J	0.580 J	0.736 J	<2.50	4.64	0.395 J	8.63	<0.500	0.851 J	5.54	52.8	8.93	39.6	19.1	14.1	2.08
SB-44-2	2.0	11/12/2024	<0.500	4.27	2.87	23.0	10.3	85.5	483	5.11	42.1 P	76.3	13.9	14.7	15.6	6.59	32.4	4.26	33.2	23.6	88.0	**225**	184	325	1,180	563	96.9	39.0
VP-4-9	9.0	11/12/2024	<0.499	<2.49	<2.49	<2.49	0.262 J	8.13	50.0	<0.499	0.318 J	0.506 J	<2.49	0.147 J	<2.49	<2.49	0.682 J	<2.49	<4.99	<0.499	0.295 J	2.34 J	17.2	1.99	7.20	2.91	1.55 J	0.305
SS-1	0-0.5	11/15/2024	<0.498	1.72 J	1.20 J	5.34	2.85	200	2,520	--	--	--	--	--	--	--	--	--	--	2.85	9.07	**35.3**	397	--	--	--	--	5.41
SS-2	0-0.5	11/15/2024	<0.487	3.98	4.12	11.6	8.98	240	1,770	--	--	--	--	--	--	--	--	--	--	5.41	16.0	**81.2**	506	--	--	--	--	9.37
SS-3	0-0.5	11/15/2024	0.938	7.04	6.34	17.3	14.1	354	2,460	--	--	--	--	--	--	--	--	--	--	6.20	18.3	**165**	776	--	--	--	--	16.0
SS-4	0-0.5	11/15/2024	<0.499	3.04	2.52	6.81	5.75	126	854	--	--	--	--	--	--	--	--	--	--	7.66	12.2	**66.9**	289	--	--	--	--	6.06
Screening Levels																												
DTSC Residential Soil [2]			4.8	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	100	NE	NE	NE	NE	NE	--
DTSC Residential Soil Remediation Goal [3]			--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	50
EPA Residential Soil [4]			4.8	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	100	NE	NE	NE	NE	NE	--

Notes:

below ground

HpCDD = Heptachlorodibenzo-P-dioxin

HpCDF = Heptachlorodibenzofuran

HxCDD = Hexachlorodibenzo-P-dioxin

HxCDF = Hexachlorodibenzofuran

PeCDD = Pentachlorodibenzo-P-dioxin
PeCDF = Pentachlorodibenzofuran
TCDD = Tetrachlorodibenzo-P-dioxin
TCDF = Tetrachlorodibenzofuran
OCDD = Octachlorodibenzo-P-dioxin
OCDF = Octachlorodibenzofuran
pg/g = picograms per gram
D = Sample diluted
J = The concentration detected is below the laboratory Reporting Limit/LOQ
P = Reported concentration may include contribution from chlorinated diphenyl ether(s)
<X = Not detected at or above laboratory reporting limit
NE = Screening level not established
-- = not analyzed/not applicable
* = Result diluted
[1] = Dioxin toxicity equivalents (TEQs) calculated in accordance with DTSC HERO HHRA Note 2, April 2017.
[2] = Table 1: Human Health Risk Assessment (HHRA) Note 3, June 2020 - Revised May 2022, DTSC-Modified Screening Levels. Where applicable, most conservative value between the cancer and noncancer endpoint used.
[3] = Table 1: Dioxin-TEQ Soil Remedial Goals for Sites in California, HHRA Note 2, April 2017.
[4] = US EPA Regional Screening Levels (RSLs) November 2024 (TR=1E-06 , THQ=1.0)
Dioxins and Furans were analyzed using EPA Method 8290A
Bold: Concentration at or exceeds DTSC HHRA Note 3 Residential Cancer Screening Levels (SL) or RWQCB Environmental Screening Level (ESL) if no DTSC SL is established

Table 8 – Soil Analytical Results: Asbestos

Sample ID	Sample Depth (ft bgs)	Date Sampled	Asbestos
			%
SB-17-7	7.0	11/13/2024	ND
SB-22-10	10.0	11/13/2024	ND
SB-31-10	10.0	11/15/2024	ND
SS-1	0-0.5	11/15/2024	ND
SS-2	0-0.5	11/15/2024	ND
SS-3	0-0.5	11/15/2024	ND
SS-4	0-0.5	11/15/2024	ND
Screening Criteria			%
DTSC Residential Soil [1]			NE
EPA Residential Soil [2]			NE

Notes:

ft bgs = feet below ground surface

ND = Not detected

NE = not established

DTSC = Department of Toxics Substance Control

EPA = United States Environmental Protection Agency

[1] = Table 1: Human Health Risk Assessment (HHRA) Note 3, June 2020 - Revised May 2022, DTSC-Modified Screening Levels.

[2] = US EPA Regional Screening Levels (RSLs) May 2024 (TR=1E-06 , THQ=1.0)

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FLINT

Exhibit C

Correspondence between the District and the Department of Toxic Substances Control

Department of Toxic Substances Control

Yana Garcia
Secretary for
Environmental Protection

Katherine M. Butler, MPH, Director
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Gavin Newsom
Governor

SENT VIA ELECTRONIC MAIL

July 3, 2025

Mr. Julio Arroyo
Director of Maintenance, Operations and Safety
Mill Valley School District
411 Sycamore Avenue
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DTSC REVIEW OF DRAFT PRELIMINARY ENDANGERMENT ASSESSMENT REPORT, MILL VALLEY MIDDLE SCHOOL, 425 SYCAMORE AVENUE, MILL VALLEY, CALIFORNIA (PROJECT CODE 204343)

Dear Mr. Arroyo:

The Department of Toxic Substances Control (DTSC) reviewed the Draft Preliminary Endangerment Assessment Report (Draft PEA Report – Ninyo & Moore, April 8, 2025), which was received on April 8, 2025. The Draft PEA Report was prepared by Ninyo & Moore on behalf of the Mill Valley School District (District).

BACKGROUND

The District is proposing to redevelop an existing 10.2-acre portion of Mill Valley Middle School (MVMS), located at 425 Sycamore Avenue in Mill Valley, California (Site), by demolishing the existing middle school and constructing a new middle school. The Site is developed with the District offices and MVMS. The Site surface consists of hardscape (asphalt, concrete, and buildings) and landscape areas. A drainage channel (known as Ryan Creek) cuts across the northern portion of the Site oriented west to east and discharges into the Pickleweed Inlet (known as the Sausalito Canal) to the east of the Site.

The Site once operated as the Mill Valley Dump, a household waste landfill and burn dump from the early 1900s until closing in the 1950s. The dump operated for approximately 50 years, burning waste if possible and spreading the remaining waste

across the dump. The historical extent of the dump extends beneath properties located to the north and south of the Site. Prior to landfill operations, the Site was undeveloped tidal marsh. MVMS was built at the Site in 1969.

In November 2024, Ninyo & Moore conducted PEA investigation drilling and sampling activities and submitted environmental samples to analytical laboratories; the Draft PEA Report summarizes these activities. In general, the Draft PEA Report: 1) describes the soil, soil vapor, groundwater (GW), and surface water sampling performed at the Site, 2) presents the results of laboratory analyses, and 3) evaluates the risk to human health and the environment from contaminants of potential concern (COPCs) identified in the subsurface media and surface water at the Site. The Draft PEA Report was prepared in conformance with the DTSC approved PEA Work Plan.[1]

DISCUSSION

The Draft PEA Report concludes that COPCs consist of metals (primarily lead and arsenic), total petroleum hydrocarbons (TPHs), polycyclic aromatic hydrocarbons (PAHs), and dioxins in soil; volatile organic compounds (VOCs) in soil vapor; metals and TPHs in GW and lead and TPH as diesel (TPHd) in surface water. The Draft PEA Report states that COPCs in soil at the Site are mainly in the landfill waste, which varies in thickness and is distributed across most of the Site.

The Draft PEA Report includes a human health risk assessment (HHRA), which assessed exposure to COPCs in soil and dust, vapor intrusion to indoor air, and GW. The HHRA considered two different scenarios including “current” school staff and students, and future residential use for the Site. In addition, the Draft PEA Report includes an Ecological Risk Assessment (ERA) that evaluates the potential for exposure posed by COPCs to ecological receptors and assesses the site for Sea Level Rise (SLR).

The Draft PEA Report offers the following recommendations:

- Develop a Response Plan that provides appropriate mitigation measures, including installing vapor barrier or mitigation systems in new buildings, which will address COPCs detected in soil and soil vapor during construction and after occupancy of the new middle school. The Response Plan will be prepared concurrently with the recommended

[1] DTSC: “*DTSC Approval – Preliminary Endangerment Assessment Work Plan, Revision 2, and Addendum”;* October 16, 2024.

investigation work below to accommodate the proposed redevelopment schedule.

- Perform additional soil vapor sampling to evaluate seasonal and temporal variability in soil vapor concentrations and verify COPC concentrations detected.

- Install sub-slab vapor pins to evaluate sub-slab vapor concentrations to refine the HHRA for current occupants.

- Collect surface and/or groundwater samples off-Site to the east along the Richardson Bay Shoreline to further evaluate the potentially complete groundwater exposure pathway to ecological receptors from COPC-impacted groundwater migrating off-Site.

DTSC has several comments that will affect the assessment and recommendations of the Draft PEA Report. Please incorporate the following comments and recommendations below into a revised PEA Report, internally discuss and plan on how to fulfill the California Education Code Public Comment Period for a PEA, and then, after consultation with DTSC, plan to prepare a Supplemental Site Investigation (SSI) report or prepare to move directly into the Removal Action phase, as applicable.

General Project Manager Comments

1) If the school district still wishes to move forward with the school remodel, a Supplemental Site Investigation (SSI) is needed to fill data gaps (see comments below). A “Response Plan”, as mentioned in the conclusions of the Draft PEA Report, without full site characterization will need to be comprehensive across the entire site. DTSC recommends a meeting to discuss sampling and cleanup options as soon as the comments below are reviewed by the District and its consultants.

2) COPCs above regulatory limits in soil vapor were found near the subject buildings. DTSC recommends a comprehensive indoor air sampling plan be included with an SSI Workplan for the Site.

3) The Draft PEA Report indicates that a Response Plan is necessary. The Site includes a portion of Ryan Creek; any future mitigation/remedial efforts must include protection of this water body.

4) Using a Bioattenuation factor (BAF) cannot be applied to the project site without nuance. If there was nothing built on site, varying oxygen levels across the site would lead to the BAF 0.001 level being discarded, defaulting to the 0.1 level,

since the delineation of oxygen levels are unknown. However, according to the VI Guidance, BAF is not to be applied to sub-slab locations, meaning BAF cannot occur under foundations or concrete, without delineation of the future building footprint, BAF will not be allowed in the analysis for any of the sample locations. Risk in the Draft PEA Report must be reevaluated without the use of a BAF.

5) The locations of future building footprints, hardscape walkways such as concrete and asphalt and associated joint trench, sewer, water and drainage pipelines should be overlaid on one sampling Figure in the Draft PEA Report for comparison in future reports.

6) There are multiple references to a “cap” in the report. Usage of this term “cap” is misleading, and the term should be avoided because a cap is perceived to be an engineered barrier. It is assumed in the Draft PEA Report that the project site already includes cover preventing contact between COPCs in the soil and site occupants, be it grass, planter boxes, concrete, asphalt and building floors, etc. However, the landscaped areas onsite were not sampled for metals at 0-0.5 feet and these areas exist as a data gap. Thus, there may or may not be a complete cover because it is unknown whether the landscaped areas have not been impacted by the burn ash.

7) The Draft PEA Report provides little information regarding the operational activities involving the former burn dump. Information as to what the source of fuel was used for burning refuse is not known. It is likely that the source of total petroleum hydrocarbons (TPH) found at the site could be related to past on-site activities.

8) Past Use of the Site included incineration of municipal soil waste. It is likely, based on the time, that past burning of debris at the Site did not include adequate safeguards to ensure that the distribution/accumulation of heavy metals and/or other associated COPCs in soils resulting from anthropogenic deposition is confined solely to Site boundaries. Considering the past burning/disposal of waste on the Site is the source of known on-site contamination, the potential for off-site contamination attributed to anthropogenic deposition must also be considered.

9) The Draft PEA Report concludes that only lead was found in surface water samples above DTSC Screening Levels (SL); however, the laboratory reporting limits for several metals were documented as being above DTSC’s associated SLs. Landfill waste material is present along the banks of Ryan Creek, and it is very likely that significant dilution at the interface with creek water and the waste materials is occurring. Therefore, DTSC requires pore water samples be

collected along the banks of Ryan Creek to confirm lead as the only metal in the waste impacting surface water quality.

Specific Project Manager Comments

1) Executive Summary, page 2. This section of the Report states that *"Current regulatory guidance requires risk assessments to be conservative in nature and to overestimate potential health risk."* Please include a reference(s) to the current regulatory guidance cited for this sentence.

2) Figures: The Site boundaries depicted on Figures 1 and 2 (in blue) are not consistent, nor are they consistent with Figures 3 through 9 in the Draft PEA Report. Also, Figure 2 shows a truncated boundary for the Mill Valley Burn Dump (yellow dash) near the southwest corner of the Site. While ash waste was not likely buried in the southwest corner of the Site, this area was still part of the Mill Valley Burn Dump and its associated facilities.

3) Appendix B - Historical Aerial Images: The historical aerial photos presented have a boundary that is different from the other boundaries depicted in the Figures. While this is likely due to timing of when the aerial photographs were procured from EDR® and subsequent changes regarding the project boundaries, this error in depicting the Site boundary should be explained in the text of the report .

4) Section 3.10 – Soil Vapor Sampling, first paragraph This section states that Soil vapor samples could not be collected from VP-1-5, VP-4, VP-5, or VP-7-10 due to water in the tubing or from VP-3-10 or VP-6 due to low flow conditions. The report should explain further what is causing the water in the tubing (i.e. high groundwater conditions, recent rains, landscape watering, etc.) and what maybe causing the low flow conditions.

5) Section 3.10 – Soil Vapor Sampling, second paragraph: The last sentence states "*The presence of water in some vapor probe tubing and the high back pressure observed is likely due to shallow groundwater conditions and attempted sampling during the rainy season."* While this statement may explain why water was found in the tubing, DTSC notes that soil vapor sampling was performed in the rain as noted in the Soil Vapor Sampling Sheets presented in Appendix E. DTSC's 2015 advisory for soil gas sampling states that soil gas sampling should not occur during a significant rain event (described as 1/2 inch or greater of rainfall during a 24-hour period) and should only occur after five days without a

significant rain event.[2] DTSC notes that soil vapor sampling occurred on November 23 and 24, 2024; a review of recorded rain totals for Mill Valley indicates that as much as three (3) inches of rain fell in the Mill Valley area in the three days (November 20-22, 2024) preceding the sampling event.[3] Hence, the soil gas sampling did not follow DTSC's soil gas sampling protocol; as such, concentrations of COPCs, or lack thereof, reported cannot be relied on to assess related environmental conditions for the Site. Resampling is required.

6) Section 4.1 Deviations from PEA Work Plan: This section states that there were 12 soil borings where sample analyses could not be performed due to insufficient sample mass collected. Please provide an explanation as to why a sufficient sample mass was not achieved and how the lack of data regarding leachability characteristics may or may not change conclusions regarding the status of the Site's current environmental integrity.

7) Section 4.6, Soil Vapor Analytical Results, Section 4.6.2 TPHg: Per the VI Guidance, BAF is not to be applied to sub-slab locations, meaning since BAF cannot occur under foundations or concrete, without delineation of the future building footprint, BAF will not be allowed in the analysis for any of the sample location. Please recalculate the Risk Results and update the tables and figures as needed.

8) Section 5.1 Contaminants of Potential Concern and Potential Sources: There is discussion of an abandoned underground storage tank (UST) of waste oil at the adjacent sewer treatment facility as the potential source of onsite TPH; while this attribution is somewhat plausible, it's likelihood in the Draft PEA Report was not fully developed. DTSC review of the California Regional Water Quality Control Board's Geotracker database shows that there are 17 known LUST sites within 0.5 miles upgradient of the project site. Also, with past use of the Site itself as a burn dump the possibility a fuel source (such as from an underground or aboveground tank) may have been used in the burning of refuse; more research may be necessary. Attribution is important, but the abandoned UST at the southerly sewer treatment facility is only one potential source and doesn't

[2] https://dtsc.ca.gov/wp-content/uploads/sites/31/2021/11/VI_ActiveSoilGasAdvisory_FINAL_a.pdf

[3] https://weatherspark.com/h/m/531/2024/11/Historical-Weather-in-November-2024-in-Mill-Valley-California-United-States

address the fact that most of the vapor probes (VP) did not produce sample results - created data gaps in the investigation.

9) Section 5.8 - Factors Related to Air Pathways: This section states that "*We note that in addition to the waste, which can be an anthropogenic source of methane, Bay Mud is present, which is a known natural source of methane*." DTSC notes that source identification is important but does not change the need to test for and potentially mitigate the presence of the methane gas in the existing buildings. An SSI workplan should include indoor air sampling for methane.

10) Table 3-1 - Methane Gas Field Screening Results: Methane gas is recorded as 5% in VP-9. Methane between 5% and 15% is within the explosive range (field notes suggest 100% of the lower explosive limit for methane was detected). DTSC is requiring the Draft PEA Report be revised to recommend adding methane sensors to all the existing buildings immediately. Also in Table 3-1, please label all of the depths in the table properly; example, VP-3 should read VP-3-5.

11) Section 6.7 - HHRA Conclusions: DTSC notes the following:

- There are 10 VP locations with three (3) having two sample collection depths (otherwise known as "dual-nested").
- Three (3) out of the 10 VPs on the project site did not produce any soil gas samples.
- All three (3) of the dual-nested VPs produced only one sample. A shallow or deep sample in these VPs could not be obtained due to water in the probe or low-flow conditions.
- On the west side of the project, three VPs (VP-4, VP-5 , and VP-6) around the main building did not produce any vapor samples
- Four (4) VPs around the main building on the west side of the project did return a sample result (VP-1, VP-2, VP-3, VP-7).
- VP-2 had a TPH as gasoline of 1,000,000 micrograms per cubic meter (ug/m3).

Since BAF cannot be used for the site, the theoretical assessment for indoor air based on 3 shallow vapor samples is overly optimistic. Indoor air should be tested due to the data gaps prior to drawing conclusion about anything other than the "theoretical" safety of indoor air. Factoring out the use of BAF, please

provide the rationale that supports the assumption that indoor air is currently safe when six (6) out of 13 VPs did not return results, and there is percent (%) methane detection in VP-9 that is in the explosive range.

Geology Comments – GSB

1) Laboratory Reporting Limits Too High: The Report should recommend using the Soil Gas Advisory's (Cal-EPA, 2015) Alternative Sampling Method on select soil vapor probes which consist of low flow purging and sampling of in aliquots, until three purge volumes are removed and sampling is complete. The Advisory defines a purge volume as the internal volume of the tubing and probe tip, the void space of the sand pack around the probe tip and the void space of the dry bentonite in the annular space. If soil vapor samples cannot be collected from existing probes due to low permeability resulting in high vacuum, reinstallation of the soil vapor probes may be necessary using Soil Gas Advisory (CalEPA, 2015) Alternative Installation specifications. Due to high vacuum and reduced sample volumes in soil vapor probes VP-1-10, VP-2 and VP-3-5, the laboratory applied a dilution factor that increased the reporting limits for several contaminants of concern (COCs) above their respecting screening levels.

2) Soil Vapor Sampling Procedures. The Report should identify that soil vapor sample protocols were not conducted in accordance with the Soil Gas Advisory (Cal-EPA, 2015) and recommend corrective actions for the next sampling event. The field forms indicate that the air flow stalled and high vacuum (204-320 inches of water) resulted in samples collected from soil vapor probes VP-1-10, VP-2 and VP-3-5. The Soil Gas Advisory (Cal- EPA, 2015) indicates that the maximum vacuum applied during both purging and sampling should be less than 100 inches of water to ensure the collection of high-quality data.

3) Silica Gel Cleanup Laboratory Procedure Recommended. The Report should recommend using EPA's silica gel cleanup method on soil, soil vapor and groundwater to exclude interference from biogenic organics from quantitative extractable petroleum hydrocarbons results. Total petroleum hydrocarbons (TPH) were detected at multiple locations across the site with the highest concentrations of TPH as gasoline detected in soil vapor in VP-2 and in soil in SB-6, located in the southwest corner of the site.

4) Groundwater Data Gaps. The Report should recommend the collection of additional groundwater samples to step out from the sample locations that had results exceeding the screening levels as well as from the western portion of the site which had the proposed groundwater sample locations moved. In

addition, the groundwater analysis should include all COCs detected in soil and soil vapor.

5) Soil Vapor Data Gaps. The Report should recommend the collection of additional soil vapor samples to step out from the sample locations that had results exceeding the screening levels. Specifically, soil vapor probes VP-1, VP-10 and VP-11; however, several locations were not sampled due to water present in the tubing and soil vapor probes VP-1-10, VP-2 and VP-3-5 were sampled under high vacuum resulting in data quality concerns and reporting limits greater than the screening levels. These data gaps should be resolved to complete the soil vapor investigation and to determine if risk to human health and the environment are acceptable.

6) Monitoring Well Network Needed. The Report should recommend that an adequate monitoring well network be installed to determine groundwater flow direction and gradient and to monitor the fate and transport of COCs detected above the screening levels at the site. The current investigation consisted of grab groundwater samples resulting in detections of several COCs above screening levels with no understanding of the groundwater flow directions or gradients.

Toxicology Comments (Human Health) – HERO

HERO - General Comments

1) Data Summary: HERO provides a data summary below. For brevity, not all exceedances are listed.

   a. Soil: Contaminants of potential concern (COPCs) are distributed heterogeneously across various depths [generally between 5 to 10 feet below ground surfaces (ft bgs)] – but are not found in Bay Mud. These include:

      i. Lead: 92 – 23,000 milligrams per kilogram (mg/kg) in soil above the residential SL of 80 mg/kg in soil (0.5 – 15 ft bgs, concentrations above 1,000 mg/kg all appear to be 5 ft bgs or deeper, except for 4,500 mg/kg at SB-13-1.5 at 1.5 ft bgs).

      ii. Mercury: maximum concentration of 9.1 mg/kg at 10 ft bgs at SB-37-10. Maximum concentration at shallower depths is 3.8 mg/kg (2.5 ft bgs), above the residential SL of 0.67 mg/kg.

      iii. Total petroleum hydrocarbon diesel (TPHd): 3,200 mg/kg at SB-29-10 at 10 ft bgs, above the residential Environmental Screening Level (ESL) of 260 mg/kg.

iv. Arsenic: 110 mg/kg at SB-13-1.5 1.5 ft bgs; greater concentrations at deeper depths, above the proposed Site-specific background of 15 mg/kg.

v. Hexavalent chromium: 1.7 mg/kg at SB-6-1.5 at 1.5 ft bgs, above the residential SL of 0.3 mg/kg.

vi. Dioxins: 2,3,7,8-tetrachlorodibenzo-p-dioxin (2,3,7,8-TCDD) and total hexachlorodibenzo-p-dioxin (Total HxCDD) were detected in all 43 samples that were analyzed for dioxins, with some exceedances noted.

b. Soil Vapor:

i. Total Petroleum Hydrocarbon as gasoline (TPHg): VP-2 has 1,000,000 micrograms per cubic meter (µg/m^3) TPHg at 5 ft bgs and above the ESL of 200,000 µg/m^3 when an attenuation factor (AF) of 0.3 and a bioattenuation factor (BAF) of 0.1 is applied. Table 12 also includes a BAF of 0.001, which applied elevates the ESL to 20,000,000 ug/m3. VP-2 is adjacent to a building (not under) in the southwest corner of the Site; TPHg concentrations surrounding VP-2 have not been fully delineated. For more details about the use of a BAF, see HERO comment #4 below.

ii. Volatile Organic Compounds: Benzene, ethylbenzene, tetrachloroethylene (PCE), trichloroethylene (TCE), vinyl chloride, chloroform exceed residential SLs with a 0.03 AF applied.

c. Groundwater (GW): Eleven metals [e.g., arsenic, barium, cadmium, chromium (form not specified), lead, nickel, mercury, others] and TPHd exceed relevant SLs for GW. In some instances, GW metals concentrations are six orders of magnitude higher than their DTSC SLs (i.e., arsenic when compared to the DTSC SL), although more generally, the majority of GW metals concentrations are 1-2 orders of magnitude higher than their respective SLs (see Table 10 in the Draft PEA Report).

d. Surface Water: TPHd at or above its ESL of 100 micrograms per liter (µg/L) at two locations (100 µg/L at SW-2, 170 µg/L at SW-1).

12) Conceptual Site Model (CSM): HERO recommends including students for the ingestion and dermal exposure pathways to surface water (accessing and playing in a creek).

13) Updated Screening Levels (SLs; DTSC HHRA Note 3): DTSC recently released an updated version of HHRA Note 3 that contains updated SLs. In the revised

Draft PEA Report, HERO recommends updating SLs to be consistent with this document, in all tables, and in the risk assessment.

Please check the DTSC website (https://dtsc.ca.gov/human-health-risk-hero/) for additional updates to HERO notes in the coming weeks.

2) Use of BAF: HERO does not support use of the BAF and recommends removing it from the text and tables. Data supports that some bioattenuation may be occurring in a few locations but overall bioattenuation is not likely to occur evenly across the Site based on oxygen content. In addition, future building locations may also disqualify the BAF from being applied; for example, VP-2 will be under a future building. (See the Soil Gas Oxygen Concentration Screening Approach Section in the 2023 DTSC Supplemental Vapor Intrusion Guidance, "*The BAF is not applied to sub-slab soil gas…*").

HERO - Risk and Uncertainty Comments

3) Risk Summary: HERO has no objections to presenting both the residential receptor and the Site-specific staff/student receptors in the Draft PEA Report. However, for the purposes of evaluating unrestricted land uses and any potential mitigation, HERO supports the use of the residential receptor. The residential cancer risk and non-cancer hazards are as follows:

   a. Direct Exposure to Contaminated Soil

      i. Cancer risk: $1x10^{-4}$ (one in 10,000)

      ii. Hazard Index (HI): 60

   b. Vapor Intrusion (soil vapor to indoor air)

      i. Cancer risk: $7x10^{-6}$ (seven in one million)

      ii. Hazard Index: 6

4) Requests/Questions for Risk Assessment:

   a. HERO recommends including direct exposure to GW (including ingestion) because the basin plan lists municipal beneficial uses and all official beneficial uses of GW should be protected in the absence of restrictions imposed by a land use covenant.

b. Please present all risks for all receptors and environmental media in one table in the main text. Please also provide cumulative risk, with all media totaled per receptor.

c. Please clarify if a 95% upper confidence limit (95% UCL) was used as the exposure point concentration (EPC) for the staff/student versus a maximum concentration as the EPC for the residential receptor (Tables J-6 and J-7, and elsewhere).

d. Please clarify why semi-volatile organic compounds (SVOCs) and dioxins are included in Table J-7 but not in Table J-6.

5) Uncertainty Section: HERO recommends including an uncertainty section discussing the items below and their potential impact to risk assessment. If relevant, please include an uncertainty discussion for any other data.

a. Thallium in soil Section 4.3.1 [i.e., lab reporting limit greater than EPA Regional Screening Level (RSL)]

b. Thallium, antimony in GW, Section 4.4.1 [i.e., lab reporting limit greater than U.S. EPA Maximum Contaminant Levels (MCLs)]

c. COPCs in surface water, Section 4.5.1 (i.e., lab reporting limits for antimony, arsenic, cadmium, mercury, and thallium were above the MCLs)

d. Vinyl chloride in soil gas method detection limit (MDL) above SL for all soil gas data (Table 12 of the Draft PEA Report) except for one data point for vinyl chloride which is J-flagged.

HERO - Data Comments

6) Soil Vapor Data: HERO finds there are a number of factors that may be contributing to questioning the reliability of the soil vapor data: 1) sample depth (2.5 ft bgs) may be influenced by air from the atmosphere, 2) half of the proposed soil vapor sample locations did not collect data, 3) it may have been raining before or during collection of soil vapor samples, 4) organic matter may have skewed some of the results (see further information in comments from staff from the Geological Services Branch). Therefore, HERO recommends resampling soil vapor locations, and adding more soil vapor locations, as part of a potential Supplemental Site Investigation (*see additional recommendations in the Additional Sampling Section, below*). Depending on the second round of soil gas sampling, HERO may recommend indoor air sampling in the future.

7) Entire Extent of Former Landfill: HERO requests the following information:

   a. Whether the entire extent of the landfill is known (extent estimated shown on Figure 2; i.e., whether portions of the landfill are offsite). Based on historic aerial photography, HERO asks whether the landfill extent could be further than shown on Figure 2.

   b. If there is concern that if cleanup were to occur onsite, offsite landfill waste could potentially leach/impact clean onsite conditions.

8) Section 4.2.1 Burned Waste Layer: Please clarify if dioxins and polyaromatic hydrocarbons (PAHs) were sampled in the observed burned waste layer.

9) Table in Section 4.3.1: HERO asks for clarification on the following:

   a. Please provide a reference or rationale for an arsenic residential SL of 15 mg/kg as a footnote to the table.

   b. Please clarify the SL exceedance for zinc. The concentration provided in the "Concentration Range Above SL (mg/kg)" column is below the concentration provided in the "Residential SL or RSL" column.

10) Arsenic Background: HERO requests further information is provided regarding how onsite background samples were determined. HERO supports other comments made by staff from the Geological Services branch (GSB) regarding the arsenic background.

11) Method Detection Limit (MDL) Above Screening Levels: HERO recommends working with the analytical laboratory to ensure that MDLs and/or reporting limits, are below screening levels, especially for constituents in soil gas, such as vinyl chloride.

HERO - Additional Sampling and Future Response Plan Comments

12) Proposed Response Plan: HERO supports submission of a response plan to discuss potential Site mitigation measures, as well as additional proposed soil vapor sampling (seasonal and temporal variability) and surface/GW samples.

13) Proposed Future Remedy: HERO finds that any future proposed remedy must also address sea level rise and potential risk relating to the release of chemicals from GW level rise and chemistry changes to GW.

14) Recommendation for Exceedances in Surface Water: Based on exceedances of TPH in surface water (Section 4.5.2), HERO recommends that any future proposed mitigation measures for the Site include making surface water inaccessible.

15) Recommendation for Exceedances in GW: Based on the metals and TPH exceedances in GW, HERO recommends either working with the San Francisco Bay Area Regional Water Quality Control Board about de-designating onsite GW from the beneficial use in the basin plan or addressing via a land use covenant that GW is not to be used for drinking water onsite.

16) Additional Sampling:

    a. HERO recommends additional soil, soil gas, indoor air, GW, and surface water sampling at the Site.

    b. For the future proposed additional sampling, please clarify if any of the locations with deviations (Section 4.1) or those that were not sampled (including STLC/TCLP/pH), will be addressed in the future sampling event.

    c. HERO recommends step outs / step downs for PAHs at sample ID SB-10-9 based on exceedances described in Section 4.3.4 to fully delineate PAHs onsite.

    d. HERO recommends step outs / step downs for all sample IDs with dioxin exceedances, described in Section 4.3.7.

    e. Sampling for dioxins and PAHs in the observed burned waste layer, unless already done (see Comment 10, above).

    f. Further delineation of SB-14 based on data in Table 3.

    g. Sample GW in southwestern corner.

    h. Based upon multiple metals exceedances in GW, HERO recommends sampling GW offsite to delineate any offsite GW plume and to determine potential risk to offsite receptors.

    i. HERO supports GSB’s recommendation for GW monitoring wells.

17) Additional Sampling Work Plan: Please indicate whether a separate sampling work plan will be submitted to DTSC for review. HERO recommends two work plans, one for an indoor air investigation and the other work plan for all other media.

18) Future GW Samples: HERO recommends analyzing both filtered and unfiltered GW samples. DTSC HHRA Note 4 recommends "given that unfiltered water may be of potable quality at some sites" and to inform on the total particulate-bound contaminants. Both methods (filtered and unfiltered) may be used for comparison and application to different hypothetical GW use scenarios.

19) GW Remedy: HERO requests that any proposed remedy/mitigation for GW consider sea level rise and address how GW will be impacted if waste is left in place.

HERO – Other Comments

20) Appendices: While HERO reviewed all appendices, its review focused on *Appendix H - Statistical Analysis of Soil Arsenic Data*, and *Appendix J- Human Health Risk Assessment Summary Tables*.

21) Define "Waste Prism": HERO understands the concept of this term, HERO recommends providing a definition in the document.

Toxicology Comments (Ecological) – ERAS

ERAS – General Comments

1) Overview: The Report contains the appropriate qualitative elements of an ecological screening evaluation that would be expected in a PEA, including site characterization, biological characterization, and ecological pathway assessment. Information from these was used to develop a conceptual site model (CSM). The Report also includes a Screening-Level Ecological Risk Assessment (SLERA) which is intended to identify COPCs that may pose an unacceptable risk to ecological receptors; these COPCs are retained for further consideration. ERAS overall concurs with the qualitative evaluation, and most of the following comments are focused on the SLERA.

2) Soil Environmental Screening Levels (ESLs): In the SLERA, soil COPCs are selected based on comparisons of analyte concentrations to the San Francisco Regional Water Quality Control Board's terrestrial habitat ESLs. These ESLs were derived using concentrations that were observed to cause adverse effects in a subset of receptors (i.e., they are "effect-based" ESLs). ERAS does not recommend using effect-based ESLs as the determining comparators for soil COPC selection in a SLERA. Instead, using the no-observed-adverse-effect (NOAEL)-based ESLs from the U.S. EPA's Ecological Soil Screening Levels (Eco-SSLs) and, secondarily, the NOAEL-based ESLs from the Los Alamos National Laboratory's ECORISK Database are more appropriate .

(see https://www.intellusnm.com/documents/documents.cfm; search LANL Files)

3) Soil Depth: For screening of soil samples, it appears that data from all sampled depths were considered for a given COPC. As an informative note, ERAS recommends that ecological risk assessments separately evaluate COPCs in surface soil (e.g., 0 to 0.5 feet bgs) and ecologically relevant depths of sub-surface soil (e.g., down to 6 feet bgs). For most terrestrial receptors, exposure is primarily limited to contact with the surface soil interval, while the sub-surface interval may be contacted by burrowing receptors and plant roots.

   The exposure pathway to ecological receptors is considered incomplete for most soil locations except for those near Ryan Creek (i.e., the sediment samples), which were only sampled at 0 to 0.5 feet bgs. Therefore, no revision is necessary based on this comment.

4) Screening Comparisons: The Report screened soil COPCs by comparing central tendency values (95 UCL) to ESLs. As an informative note, ERAS generally recommends that COPCs are first screened by comparing maximum detected values (at ecologically relevant depth) to their respective screening levels so that COPCs are conservatively retained.

   The 95 UCL was only calculated for soil samples at locations with an incomplete exposure pathway (Table K-1). Maximum values were used for screening COPCs at sediment locations near Ryan Creek (Table K-2) where the exposure pathway is potentially complete. Therefore, no revision is necessary based on this comment.

ERAS Specific Comments

5) Executive Summary: ERAS recommends summarizing the conclusions and recommendations from the Ecological Risk Assessment in this section.

6) Figure 17 (Conceptual Site Model): Section 7.3 indicates that soil (sediment) on the bank of Ryan Creek is exposed (except during high tide), suggesting a complete exposure pathway to terrestrial receptors. In the CSM figure, ERAS recommends differentiating between “soil” and “sediment” as exposure media, with soil being an incomplete/insignificant pathway and sediment being a potentially complete pathway.

Engineering Comments – ESPO

ESPO – Comments and Recommendations

ESPO focused its review on the Sea Level Rise Vulnerability Assessment (SLRVA) contained within the Draft PEA Report. ESPO also reviewed portions of the report to give context to the SLRVA. ESPO's comments on the SLRVA and how it affects Site conditions are below.

1) ESPO finds that the SLRVA appears to have been implemented appropriately in the Draft PEA Report. No gross deficiencies to the SLRVA were identified by ESPO. Based on the SLRVA, ESPO has the following comments and recommendations:

    a. It appears that due to site topography, nearby surface water bodies (Pickleweed Inlet to the southeast of the Site and Ryan Creek to the north), and current GW conditions, that COPC-impacted waste is already likely submerged across the Site, from 0.5 feet to 8.5 feet below the water table. This greatly increases the chances that Site COPCs are likely already more significantly mobilized than if these areas were dry, and seasonal and tidal effects are likely already allowing Site COPCs to migrate toward Pickleweed Inlet and the greater San Francisco Bay. This already existing pathway of contaminant migration indicates further evaluation of soil and sediment conditions along the northern and eastern sides of the Site is necessary.

    b. Due to shallow GW across much of the site likely co-located with waste in soil containing COPCs, more rigorous GW sampling and analysis is needed to effectively evaluate GW conditions for Site COPCs. This should be performed sufficiently to potentially determine the locations of plumes of Site COPCs, including metals, VOCs, and petroleum hydrocarbons.

    c. Unless the final site remedy will involve removing all waste above residential screening levels, it is likely that mitigation measures will be needed, as the SLRVA predicts that the northern and eastern portions of the Site will likely be affected by sea level rise in the long term.

2) ESPO notes that the soil vapor well construction diagrams appear to depict increasing GW levels (relative to ground surface) moving from west to east on the site, following the descending topography in the same direction. While ESPO finds no design issues with the soil vapor probes, ESPO notes that most of them are likely screened close to the GW surface and it is likely that the sampling screens of most of these probes are submerged at different times of the year. This can make evaluation of the soil vapor sampling results difficult. Also, the

sampling results for VOCs appear to be potentially anomalous, as the detections of VOCs in soil or GW appear to be minimal or non-detect and thus don't clearly support VOCs in soil vapor being present or prevalent. Subsequent soil vapor sampling should take place to better characterize Site conditions and verify whether VOCs in soil vapor are an issue.

3) Because of the age of the school and its buildings, all building foundations should be visually inspected for competency across the Site, especially those near soil vapor probes. Also, areas of pavement, landscaping, and other areas meant to prevent direct contact with waste should be inspected for competency. This data can inform DTSC of the likelihood of vapor intrusion occurring or possible short-circuiting of each soil vapor probe by surface air. This inspection can be part of any follow-up sampling activity.

NEXT STEPS

Generally, for a site with these sorts of environmental concerns, after the PEA is updated and ultimately approved, the next step would be an SSI. However, DTSC understands that the school district is under a tight deadline to remodel the school, so the department encourages the school district to reach out to the DTSC Project Manager as soon as possible to discuss the future timeline and project outcome.

Unless the School District wishes to withdraw, DTSC expects the PEA to undergo Public Comment under Option A or B, as required by the California Education Code.

DELIVERABLES

Please address each of the above comments and recommendations in a revised PEA Report without password protection and in a file size no more than 400 megabytes. Signature pages must be included and have either an original or electronic signature(s), or the report may be rejected.

The following items should be submitted to DTSC:

1. A clean, unmarked, unlocked revised electronic copy of the revised PEA Report (Adobe Acrobat PDF format).

2. A redline/strikeout markup of the revised PEA Report in Word Document format (DOCX).

3. An electronic copy of a response to comments (RTC) document in table form.

    a. The RTC table should restate each comment and recommendation in this letter and provide the associated response and specify where the associated

changes were made in the revised PEA Report. This file should be in Word Document format (DOCX).

b. The RTC table shall also be included in the appendix of the revised PEA Report. Please update the revised PEA Report and the table of contents to reflect the added appendix

CLOSING

If you have any questions regarding this letter, please contact me at (916) 255-3695 or via email at Peter.Ruttan@dtsc.ca.gov.
Sincerely,



Pete Ruttan, PG
Project Manager
Northern California Schools Unit
Site Mitigation and Restoration Program
Department of Toxic Substances Control

cc: See next page.

cc: (via e-mail)

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DTSC REVIEWER SIGNATURES PAGE

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Toxicology - ERAS Michael Garland, Ph.D. Staff Toxicologist Ecological Risk Assessment Department of Toxic Substances Control	**X**
Engineering - ESPO John Bystra Hazardous Substances Engineer Engineering and Special Projects Office Department of Toxic Substances Control	**X** *Perry Myers* for John Bystra
Engineering- ESPO Perry Myers, P.E. Hazardous Substances Engineer Engineering and Special Projects Office Department of Toxic Substances Control	X REGISTERED PROFESSIONAL ENGINEER PERRY A. MYERS C 69536 Exp. 6/30/ CIVIL STATE OF CALIFORNIA
Geologist – GSB Dave Kremer P.G. Senior Engineer Geologist Geological Services Branch Department of Toxic Substances Control	**X**

Department of Toxic Substances Control

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Secretary for
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Gavin Newsom
Governor

Sent Via Electronic Mail

September 9, 2025

Mr. Julio Arroyo
Director of Maintenance, Operations and Safety
Mill Valley School District
411 Sycamore Avenue
Mill Valley, California 94941
jarroyo@mvschools.org

DTSC COMMENTS – PRELIMINARY ENDANGERMENT ASSESSMENT WORK PLAN, REVISION 2, ADDENDUM 2 , MILL VALLEY MIDDLE SCHOOL, 425 SYCAMORE AVENUE, MILL VALLEY, CALIFORNIA – SITE CODE 204343

Dear Mr. Arroyo:

The Department of Toxic Substances Control (DTSC) has reviewed the document titled "Preliminary Endangerment Assessment Work Plan - Revision 2, Addendum 2" (Addendum 2). Addendum 2 was prepared by Ninyo & Moore on behalf of the Mill Valley School District (District) and is dated August 22, 2025.

Background

Mill Valley Middle School (MVMS) is located at 425 Sycamore Avenue in Mill Valley, California (Site). The District is proposing to modernize the current middle school campus through interior and exterior building upgrades, landscaping improvements, and a possible new STEM (Science, Technology, Engineering and Math) classroom building.

On April 8, 2025, DTSC received a Draft Preliminary Endangerment Assessment Report (Draft PEA Report)[1]. The Draft PEA Report 1) describes the soil, soil vapor, groundwater (GW), and surface water sampling performed at the Site, 2) presents the results of laboratory analyses, and 3) evaluates the risk to human health and the environment from contaminants of potential concern (COPCs) identified in the subsurface media and surface water at the Site. The Draft PEA Report was prepared in conformance with the DTSC-approved PEA Work Plan.[2] DTSC reviewed the Draft PEA Report and provided comments and recommendations to be incorporated into a revised PEA report in a letter dated July 3, 2025.[3] DTSC's comment letter recommended, in part, the need to address the exceedances of COPCs found in soil vapor at the Site and their potential to impact indoor air quality, and address data gaps in regard to potential COPCs in surface soils (i.e., in landscaped areas).

Addendum 2 describes the proposed additional sampling activities for sub-slab soil vapor beneath the Main Campus Building and the Gymnasium, and surface soils within landscaped areas. Addendum 2 also describes a contingency to sample indoor air sampling based on the results of the sub-slab sampling efforts.

Discussion

DTSC and its Engineering and Special Projects Office (ESPO), Human and Ecological Risk Office (HERO), and Geological Services Branch (GSB) have reviewed Addendum 2 and are providing the comments and recommendations below to be incorporated into a revised document.

Project Management Comments

1. Sub-Slab Soil Vapor Sampling – Attachments 1 through 3: DTSC believes additional sub-slab vapor locations are necessary, and some of the proposed sampling locations must be relocated due to the potential that preferential pathways may exist in the sub-slab. DTSC requires the following:

    a) An additional two (2) sub-slab sample locations must be added in the boys' and girls' bathrooms or the nearby electrical rooms located on the western side of the Main Building.

---

[1] Ninyo & Moore: "*Draft Preliminary Endangerment Assessment Report*"; April 8, 2025.
[2] DTSC: "*DTSC Approval – Preliminary Endangerment Assessment Work Plan, Revision 2, and Addendum";* October 16, 2024.
[3] DTSC: "*DTSC Review of Draft Preliminary Endangerment Assessment Report*"; July 3, 2025.

b) An additional two (2) sub-slab sample locations must be added in the boys' and girls' bathroom or the nearby electrical rooms located on the eastern side of the Main Building.

c) One (1) additional sub-slab sample location must be added in the small room located in the southwest area of the Main Building. Attachment 2 of Addendum 2 depicts this small room with labels "301" and "STAIR" on the figure.

d) DTSC discourages indoor air sampling in large rooms, such as the library in the Main Building. Hence sample locations SSP-4 and IA-4 are to be relocated into one of the offices located southwest of their current locations (example: office #1530). *See also HERO comment 4 below*.

e) DTSC suggests moving sample locations SSP-5 and IA-5 to the electrical room just east of their current location (example: rooms 1509 or 1510 provided the electric conduits are penetrating the slab – not the ceiling).

f) It is not known if chemicals of potential concern are/were being used in the science room (location of SSP-1 and IA-1). Consideration of moving this location to another classroom in this area is necessary to avoid the possibility that past or present use of chemicals in this room may obfuscate an understanding of the laboratory results.

g) Sample locations SSP-10, IA-10, SSP-11, and IA-11 appear to be in large room areas and must be relocated to their respective nearby bathroom locations.

h) Please note only add locations to electrical rooms if the conduits penetrate through the slab, not the ceiling.

<u>Engineering Comments – ESPO</u>

1. <u>Specify sub-slab concentration threshold for contingent indoor air sampling (Addendum 2, page 3-4 of 16):</u> In the section titled "Contingent Indoor Air and Ambient Air Sampling", Addendum 2 states that indoor air sampling will be conducted if sub-slab concentrations exceed screening levels, but it does not specify the numerical screening thresholds used to trigger this contingency.

   For transparency and clarity, ESPO recommends that a revised Addendum identifies the sub-slab screening levels applicable to the target chemicals of concern and the indoor air screening levels used in the calculation. Please reference literature such as the DTSC HERO Notes used to inform the sub-slab thresholds.

2. Clarify data gaps addressed by additional surface soil investigation; (Addendum 2, pg 4 of 16): In the section titled “Surface Soil Investigation”, the Addendum states that 10 additional surface soil samples (LSS-1 through 10) will be collected to further characterize the soil cover at the Site and supplement shallow soil samples previously collected at 0.5 to 1 ft bgs. The proposed soil samples will be collected at a depth of 0 to 6 inches bgs.

   ESPO recommends that a revised Addendum discusses the purpose of the additional efforts to characterize the soil. Please discuss the data gaps that the surface soil sampling efforts will address that previous investigations did not address.

Toxicology Comments – HERO

1. Indoor Air Sampling: Please provide the sub-slab soil vapor numerical thresholds that would trigger indoor air sampling.

2. Soil Samples Analysis Section: Based on the previous soil dataset collected as part of the PEA, HERO recommends also sampling soils for dioxins, as these were the only other constituents that were detected at shallow depths.

3. Sub-slab Soil Vapor Sample Locations: Based upon the elevated total petroleum hydrocarbon (TPH) concentration found at VP-3 (*see April 8, 2025, PEA Report*), HERO recommends one additional sub-slab soil vapor location under the building foundation, near VP-3.

4. Attachment 2 - Indoor Air Locations: Based upon Addendum 2, Attachment 2 Figure (PDF page 9), HERO prefers the corresponding sub-slab soil vapor location SSP-4 to be moved to the south so that IA-4 can be collected in an office or electrical room. HERO prefers sampling smaller rooms (e.g., bathrooms, classrooms, offices) rather than large spaces (e.g., large gym, cafeteria, library).

Deliverables

Please address each of the comments and recommendations in a revised document. All documents shall be provided to DTSC without password protection, in a file size no more than 1,000 megabytes. Signature pages must be included and have either an original or electronic signature. An electronic copy of the revised/final document will be posted on the DTSC EnviroStor database public access website.

The following items should be submitted to DTSC within two (2) weeks of the date of this letter:

1. A clean, unmarked, unlocked revised electronic copy of the revised document (Adobe Acrobat PDF format);

2. A redline/strikeout markup of the revised document in Word Document format (DOCX); and

3. An electronic copy of the response to comments (RTC) in table form.

    a. The RTC table should restate each comment and provide the associated response and specify where associated changes were made in the revised document. This file should be in Word Document format (DOCX).

    b. The RTC table shall also be included in the appendix of the revised document. Please update the revised document and the table of contents to reflect the added appendix.

Closing

If you have any questions regarding this letter, please contact me at (916) 255-3695 or via email at Peter.Ruttan@dtsc.ca.gov.

Sincerely,



Pete Ruttan, PG
Project Manager
Northern California Schools Unit
Site Mitigation and Restoration Program
Department of Toxic Substances Control

DTSC REVIEWER SIGNATURE PAGE

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Kahui Lim 9/8/2025

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Ninyo & Moore
A SOCOTEC COMPANY

September 23, 2025
Project No. 404704001

Mr. Peter Ruttan, PG
Project Manager
Northern California Schools Unit
Site Mitigation and Restoration Program
Department of Toxic Substances Control

Subject: Response to Department of Toxic Substances Control's September 9, 2025 Comment Letter on Preliminary Endangerment Assessment Work Plan, Revision 2 Addendum 2
Mill Valley Middle School
425 Sycamore Avenue
Mill Valley, California 94941

Dear Mr. Ruttan:

Ninyo & Moore has prepared this letter on behalf of the Mill Valley School District (District), to provide further context and an update on the status and implementation of the *Preliminary Endangerment Assessment (PEA) Work Plan, Revision 2 Addendum 2* (Addendum 2). Addendum 2 was submitted to the Department of Toxic Substances Control (DTSC) on August 22, 2025. The work plan proposed sub-slab vapor sampling under current school buildings and surface soil sampling in landscape areas. Ninyo & Moore proposed sub-slab vapor sampling locations that were distributed across the school buildings' footprints to obtain data from across the site and at locations where students and staff spend the most time. Indoor air monitoring was included as a contingent measure, based on the results of the sub-slab vapor sampling.

Prior to submitting Addendum 2, Ninyo & Moore requested a meeting with DTSC to review the sampling locations with the DTSC project team. DTSC declined based on the availability of some of the DTSC project team members. At the same time it submitted Addendum 2, Ninyo & Moore notified DTSC that, due to time constraints, the sub-slab vapor pin installation and sampling was scheduled for August 30 and 31, 2025 and provided DTSC the opportunity to observe installation and sampling.

Eleven sub-slab vapor samples were collected on August 31, 2025, and the sub-slab vapor analytical laboratory results were received on September 8, 2025. The sub-slab vapor pin installation and sampling methodologies were performed in accordance with the California Environmental Protection Agency's (CalEPA) Supplemental Guidance: Screening and Evaluating

Vapor Intrusion (VI Guidance).[1] On September 6, 2025, Ninyo & Moore collected surface soil samples from landscape areas. On September 9, 2025, DTSC issued its comments on Addendum 2 via letter. Most of DTSC's comments relate to adding or relocating sub-slab vapor pin locations to areas where potential preferential pathways may exist. One comment recommended adding dioxins analysis to surface soil samples.

Meeting with DTSC

DTSC's comments on Addendum 2 were provided after the sub-slab vapor pins were installed, the samples were collected, and analytical results were received. As a result, Ninyo & Moore and the District held a virtual meeting with DTSC on September 15, 2025 to discuss the sub-slab vapor analytical results. Ninyo & Moore presented the following conclusions during the meeting:

- Spatial distribution of sub-slab vapor pin locations provides adequate coverage of existing buildings.
- Sub-slab vapor pin locations were selected where receptors (students, teachers, and staff) would potentially have the longest time of exposure (i.e., classrooms and offices).
- Analytical results are consistent across sampling locations, demonstrating minimal variability underneath building foundations.
- All samples were below residential screening levels, except for one sample (SSP-7), which slightly exceeded the residential screening level; residential screening levels are used for conservatively estimating hypothetical future risk only and do not apply to current or future planned site use.
- Updated preliminary Human Health Risk Assessment (HHRA) incorporating sub-slab vapor results indicates there is no elevated health risk from soil vapor for current or future use of the buildings.
- The District has committed to installing a sub-slab depressurization system as part of any future renovation project.
- Analytical results of the surface soil samples remain pending. Consistent with DTSC's request, dioxin analysis will be performed for the surface soil samples.

Given the sub-slab vapor analytical results and updated HHRA results, Ninyo & Moore, the District, and DTSC determined that it is appropriate to revise the draft PEA Report such that it will include the July 2025 soil vapor sampling, August 2025 sub-slab vapor sampling, and

[1] CalEPA, 2023. Final Draft Supplemental Guidance: Screening and Evaluating Vapor Intrusion, dated February 2023.

September 2025 surface soil sampling, as well as an updated HHRA, and submit to the DTSC for review. Additionally, another round of sub-slab vapor sampling will be performed during the winter months to evaluate potential temporal variability in sub-slab vapor.

Respectfully submitted,
NINYO & MOORE

Ryan D. Bast, PG 9985
Senior Project Geologist

Aubrey K. Cool, PG 7659
Principal Geologist



RDB/AKC/gvr

Exhibit D

‘Other Ideas’ Page from MVMSModernizationMess.com

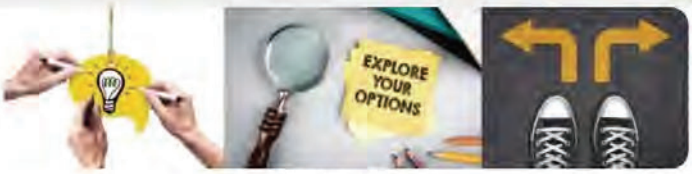
Containing Detailed Enrollment Data and Analysis

Mill Valley Middle School - Measure G Modernization Mess

District's Proposed Alternatives

- As of September 2025, the District is considering two alternatives: (1) Renovate the Middle School at its current site, or (2) build a new Middle School at the Terra Marin Lomita campus, while leaving the Enda Maguire Elementary School fully in place at its current size.
- But, as discussed in the linked page below, it is premature to decide between these. Key information is still missing that could render the renovation option economically infeasible.

Read about District's Proposed Alternatives



A Better Idea

Permanent Middle School at Edna + relocation of Edna students

The EIR dismisses this idea, but it uses obsolete enrollment data. Using current data, it is easily feasible!

Q: Why is this worth considering? What is your positive vision for the future? Why would this plan be better than the Renovation option?

- ☑ Only feasible option that meets all of the District's goals, as stated in the EIR.
- ☑ Seismically much safer than an aging 1970s foundation, which enhances insurability.
- ☑ No toxic soil exposures, explosive methane, or other health risks, which reduces the District's toxic tort liability exposure.
- ☑ No students would have to endure construction noise while learning. MVMS students would remain at MVMS until Edna site ready. Edna students could join their new schools before construction begins.
- ☑ Sustainable building that avoids sea level rise "island" effect and leaching contamination. Durable building that is worth the Measure G investment.
- ☑ No more "smell days."
- ☑ No need for wasted expense of an interim campus.
- ☑ No need to move students mid-year.
- ☑ Mitigates traffic concerns, compared to Dual-Schools at Edna option.
- ☑ Keeps 6-8th together.
- ☑ Beautiful fields at current MVMS site could enhance community enjoyment, youth sports opportunities, and help mitigate sea level rise in that neighborhood.

Q: To determine if it is feasible to relocate all of the Edna students to the District's other excellent elementary sites, we need to know the enrollment figures. What does MVSD report for enrollment?

In analyzing and summarily discarding this option, the EIR relies on the 2024-25 enrollment *projections* set forth in the *2021* Master Facilities Plan (see footnote to EIR Appendix pdf page 307, which says "Note: student count from FMP projections for 24-25"). That's very confusing, so let's break it down—rather than look at *actual* 2025 enrollment numbers or recent trends, the EIR travels back in time to 2021 to determine what people back then *thought* enrollment in 2025 *might* be.

This matters, because those higher figures are relied upon to explain why this option is ostensibly not feasible. If we look at the actual numbers, and even other figures elsewhere in the EIR, this option becomes easily feasible.

Here are the various numbers from the District, which are all over the map. This is another example of the District not taking the time to measure twice before cutting once, thus leaping to a conclusion based on bad data.

School	MVSD Reported Current Enrollment
MVMS	• 697 per Board Enrollment Update 2025-26 • 699 showing on ParentSquare Directory • 750 per EIR appendix page 307 (2021 data) • 765 per EIR page 9 • 850 students per EIR page 259
Edna	• 377 per Board Enrollment Update 2025-26 • "under 400" per EIR page 259 • 428 per MVSD FAQs • 436 per EIR page 12 • 617 per EIR appendix page 307 (2021 data)
Old Mill	• 251 per MVSD FAQs • 261 per Board Enrollment Update 2025-26 • 309 per EIR Appendix page 307 (2021 data)
Park	• 266 per MVSD FAQs • 298 per EIR appendix page 307 (2021 data) • 307 per Board Enrollment Update 2025-26
Strawberry	• 241 per MVSD FAQs • 272 per EIR appendix page 307 (2021 data) • 290 per Board Enrollment Update 2025-26
Tam Valley	• 335 per MVSD FAQs • 394 per Board Enrollment Update 2025-26 • 456 per EIR appendix page 307 (2021 data)

Citations and Links:

- MVSD Bond FAQs
- 2025-26 Board Enrollment Update
- Draft EIR + Appendix

In one place, the EIR assumes there are about 600 students to disperse from Edna, saying it would be about 150 students added to the 4 other elementary sites. That is significantly more than the District's own other Edna enrollment figures, which are as low as 377.

Elsewhere, the District FAQs says there are 428 students to disperse, and that Old Mill can take 61, Park can take 79, Strawberry could take 104, and Tam could take 154, **leaving just 30 left! That is a really small delta, which surely is solvable!** Here is that excerpt from the District's FAQs:

"If we were to move students from Edna to the other elementary schools, how can we accomplish this while maintaining our core culture and schedule?"

Much depends on how we plan to configure it. Our current model is a TK-5 model. Current enrollment: Edna has 428 students, OM has 251, Park has 266, Strawberry Point has 241, and Tam Valley has 335. If we have 428 students at Edna and we divide them among sites, we could house 398 of the 428 students from Edna based on current enrollment at the other sites. (Old Mill can take 61, Park could take 79, Strawberry Point could take 104, Tam Valley could take 154. We would need to add housing for 30 students.

Q: I've heard enrollment is down across the District. Is that true? What does 2025-26 enrollment data show?

That is definitely true! The 2021 Master Plan specifically recommends an updated, post-Covid enrollment study to revise projections done in 2021 (p. 35). No such study has been presented to the public. Regardless, current data clearly shows declining enrollment, even after the addition of TK classes.

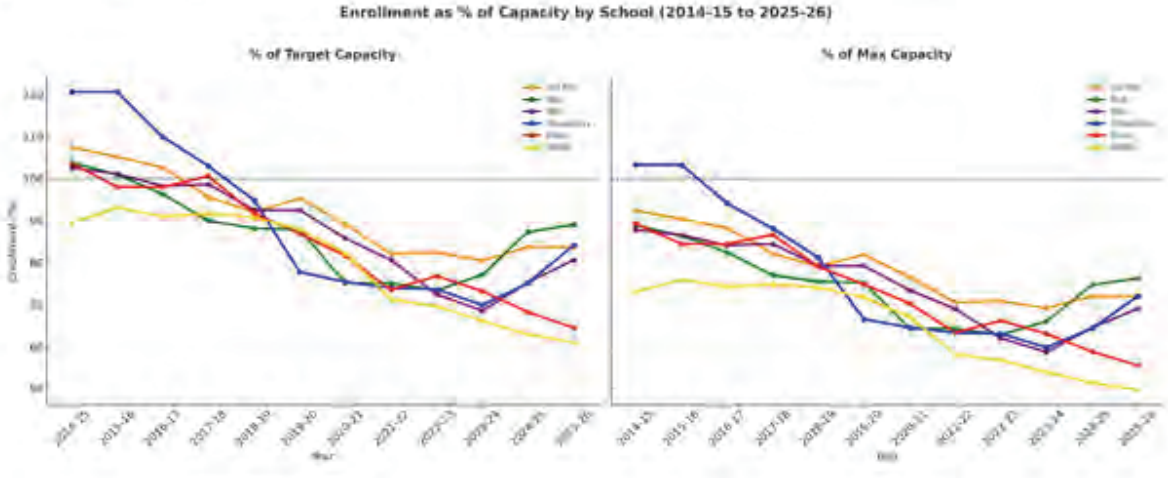


Chart Data Sources:

- 2014-2015 enrollment date obtained from CA Dept of Education – Data Quest
- 2024-2025 enrollment data obtained from 2025-26 Board Enrollment Update
- Target and Max Capacity data obtained from the 2021 Master Plan (p. 33)

Q: How many classrooms would each elementary site need to add to accommodate Edna students?

It is hard to tell, because this keys off enrollment numbers, which the District is not clearly reporting, as indicated above. But, to relocate Edna students, the District says would need to spread 25 classrooms across 4 other elementary sites. (EIR Appendix pdf page 311, but that portion of the Appendix assumes overly high enrollment figures).

25 classrooms across 4 sites

Table 5 Detailed Utilization Summary

School	Kindergarten Classrooms	Grade 1-3 Classrooms	Grade 4-5 Classrooms	Grade 6-8 Classrooms	Special Education Classrooms	Other Classrooms (Not Loaded)
Edna Maguire	5	13	6	0	1	6
Old Mill	2	7	4	0	0	2
Park	2	8	4	0	1	3
Strawberry Point	3	7	4	0	1	5
Tamalpais Valley	3	11	6	0	1	4
Elementary School Totals	15	46	24	0	4	20
Mill Valley Middle School	0	0	0	39	6	13

Even assuming those higher enrollment figures, the District shows that surplus space at each elementary site, paired with a few new portables, could do the trick. (EIR Appendix pdf page 311):

	(E) Surplus*	(N) Portables	Needed
Old Mill	2	3	5
Park	1	4	5
Strawberry	1	4	7
Tam	1	4	8
Totals:	5	15	25

Q: How would that look?

Pretty workable, and given enrollment figure discrepancies, they may not even need this many portables



Figure 22
Potential Edna Maguire Elementary School Student Relocation Site Plans

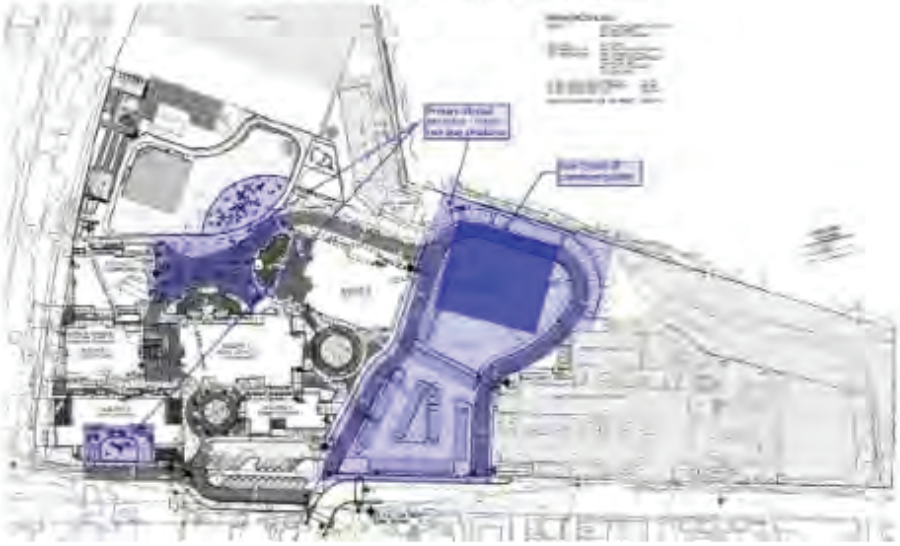
Source: AECOM, Google Earth

Q: How would the site size at Edna compare to the current MVMS?

- **Building Square Footage**. If MVMS moves to Edna, the plan would be to reuse the existing 75,000 sq. ft. of the Edna campus and construct a new 20,000 sq. ft. classroom building. (EIR pdf page 253). The total would thus be 95,000 sq. ft., which is comparable to the current MVMS that has an "existing 92,000 square foot (sq. ft.) main middle school building" (EIR pdf page 10).
- **Acreage.**The current MVMS site is about 8 acres. (EIR pdf page135).The Edna site is about 9 acres (Master Plan page 74-84), so quite comparable.

Q: Where would that new MVMS building go?

Alternative A – Middle School Site Plan Test Fit



Q: If MVMS moves to Edna, how many more students is that beyond what Edna was already designed to handle?

Edna is already designed to handle 679 students (2021 Master Plan, page 33). MVMS currently has about 697 students (2025-26 Board Enrollment Update). **So, moving MVMS to Edna would add only about 18 more students than Edna is currently designed to accommodate.** Of course, there would be a new building to expand capacity and various traffic mitigation measures, all of which is feasible.

Q: What does the EIR say about the traffic? Is there anything in the 2012 Settlement related to max enrollment permitted at that site?

"With this alternative, the traffic service levels at Lomita Drive and the school entrance and exit driveways would worsen because of the additional middle school students compared with the elementary students." (EIR pdf page 258).

But again, the EIR is assuming inflated enrollment numbers. As noted above, this plan would only add about 18 students beyond what Edna is already designed to accommodate.

We requested and received a copy of the 2012 Settlement related to traffic concerns during the original Edna construction project. We are not linking to the Settlement given neighborhood sensitives, but we can confirm it does **not** contain anything about enrollment limits for future development.

Traffic and emergency egress is a legitimate concern with this plan. However, the scope of the problem has been exaggerated and other mitigation measures have not been explored in the EIR. In addition to bussing, for instance, there could be designated drop off points, from which students could walk or bike, or shuttles could run.

Q: Any last variations to consider?

Yes. If the District does not think it can fit the remaining handful of students from Edna at the other elementary sites, it could consider keeping a smaller version of Edna Elementary at the Terra Marin location. It would need to renovate that building, but this would allow the District to still serve that local neighborhood, while reducing the increases needed at the other elementary schools.

To Recap Relevant Criteria, all of which favor the above solution

When selecting a school site, whether permanent or temporary, the California Department of Education requires Districts to consider, among other things, the following criteria:

- **Safety - "These factors MUST be avoided"**
  - Sites with contaminants/toxics in the soil or groundwater, such as from landfills and dumps.
  - Sites that are close to high-pressure lines, including sewer lines.
- **Environment - Sites should be free from:**
  - Air, water, and soil pollution.
  - Dust and odors.
- **Soils**
  - Sites shouldn't have danger of liquefaction.
- **Size and Shape**
  - Net acreage should be consisted with standards from California Department of Education.
- **Public Acceptance of the Proposed Site is also a factor**

Brought to you by a group of concerned Mill Valley parents

Contact us - MVMSModernizationMess@gmail.com

@MVMSModernizationMess

APPENDIX G. MITIGATION MONITORING AND REPORTING PROGRAM

MITIGATION MONITORING AND REPORTING PROGRAM – MILL VALLEY MIDDLE SCHOOL RECONSTRUCTION PROJECT

When approving a project for which an Environmental Impact Report has been prepared, the CEQA Guidelines [Section 15097] require that Lead Agencies adopt a program for reporting on or monitoring the changes that it has required in the project or made a condition of approval to mitigate or avoid significant environmental effects.

This monitoring program for mitigation measures identified by the Environmental Impact Report includes:

1. A list of mitigation measures with a space for the completion date,
2. The full text of the mitigation measures, and
3. Monitoring details, including: 1) agency responsible for implementation, 2) timing of implementation and monitoring, and 3) monitoring verification.
4. This MMRP applies to the Proposed Project. All measures herein also apply to Alternative 5 as described in the EIR with the exception of Mitigation Measures 3.5-1 and 3.3-1(d). A new geotechnical report would be required for Alternative 5, superseding Mitigation Measure 3.5-1; and Mitigation 3.3-1(d) would not apply because no building demolition is planned under that alternative. Should an alternative to the Proposed Project be selected that is located at a location other than the Mill Valley Middle School campus, the mitigation measures set forth in this MMRP would be modified as necessary to apply to the approved alternative.

Identified Impact	Related Mitigation Measure	MONITORING			VERIFICATION	
		Implementation Entity	Monitoring and Verification Entity	Timing Requirements	Signature	Date
Air Quality						
Project construction activities could result in a cumulatively considerable net increase of emissions of criteria air pollutants and precursors.	***Mitigation Measure 3.2.1:*** **Use Basic Dust Control Measures:** Construction-related activities, such as soil disturbance, grading, and material hauling, can also result in fugitive dust emissions. Based on the most recent BAAQMD's CEQA Air Quality Guidelines (see Table 5-2), for a project to have a less-than-significant air quality impact related to construction-related fugitive dust emissions, the project must implement the following basic best management practices: • All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day. • All haul trucks transporting soil, sand, or other loose material off-site shall be covered. • All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited. • All vehicle speeds on unpaved roads shall be limited to 15 mph. • All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used. • All excavation, grading, and/or demolition	MVSD Construction contractor	MVSD Construction manager	Ongoing during construction activities		

Identified Impact	Related Mitigation Measure	MONITORING			VERIFICATION	
		Implementation Entity	Monitoring and Verification Entity	Timing Requirements	Signature	Date
	activities shall be suspended when average wind speeds exceed 20 mph. • All trucks and equipment, including their tires, shall be washed off prior to leaving the site. • Unpaved roads providing access to sites located 100 feet or further from a paved road shall be treated with a 6- to 12-inch layer of compacted layer of wood chips, mulch, or gravel. • Publicly visible signs shall be posted with the telephone number and name of the person to contact at the lead agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The BAAQMD's General Air Pollution Complaints number shall also be visible to ensure compliance with applicable regulations.					
Project operational activities could expose sensitive receptors to substantial pollutant concentrations.	***Mitigation Measure 3.2-1*,** above, and **3.2-2** through **3.2-8,** below are required to reduce the air quality and health impacts due to construction activities to less than significant. These measures reduce combustion and fugitive dust emissions during construction activities and/or reduce the exposure to air pollutants via air filtration systems or other mechanisms. ***Mitigation Measure 3.2-2:*** **Tier 4 Construction Equipment Emission Standards:** The District shall implement the following measures during	MVSD Construction Contractor	MVSD Construction Manager			

Identified Impact	Related Mitigation Measure	MONITORING			VERIFICATION	
		Implementation Entity	Monitoring and Verification Entity	Timing Requirements	Signature	Date
	construction to reduce construction exhaust emissions: All construction equipment larger than 25 horsepower used at the site for more than two continuous days or 20 hours total shall utilize diesel engines that are USEPA certified Tier 4 "final" emission standards for particulate matter and be equipped with CARB-certified Level 3 Diesel Particulate Filters. Prior to the issuance of any demolition/construction permits, the construction contractor shall submit specifications of the equipment to be used during construction and Mill Valley School District's Construction Manager shall confirm this requirement is met. Equipment such as air compressors, concrete/industrial saws, forklifts, light stands, manlifts, pumps, and welders shall be electric or alternative-fueled (i.e., non-diesel), where feasible. Pole power shall be utilized at the earliest feasible point in time and shall be used to the maximum extent feasible in lieu of generators. If stationary construction equipment, such as diesel-powered generators, must be operated continuously, such equipment must be Tier 4 Final construction equipment or better. At a minimum, require that construction vendors, contractors, and/or haul truck operators commit to using trucks (e.g., material delivery trucks and soil import/export with a gross vehicle weight rating of at least 14,001 pounds), that meet CARB's 2010 engine emissions standards or newer, cleaner trucks.					

Identified Impact	Related Mitigation Measure	MONITORING			VERIFICATION	
		Implementation Entity	Monitoring and Verification Entity	Timing Requirements	Signature	Date
	Mitigation Measure 3.2-3: Enhanced Best Management Practices for Construction-Related Fugitive Dust Emissions (Part of Overall Fugitive Dust Control Plan): In compliance with the most recent *BAAQMD CEQA Air Quality Guidelines*, the project shall include the following Best Management Practices during construction: • To the maximum extent feasible, grading and soils work shall be conducted during the summer months when no students and minimal staff are present. • Install sandbags or other erosion control measures to prevent silt runoff to public roadways from sites with a slope greater than one percent. • Minimize the amount of excavated material or waste materials stored at the site for no more than two weeks. • All work areas shall be fenced to prevent unauthorized access. • All unpaved areas on the interim campus shall be capped with asphalt or clean soil prior to student occupancy. • Construction best management practices such as wetting of all soils during earthwork and other soil disturbing activities, covering of stockpiles, and other methods to minimize generation of fugitive dust.					

Identified Impact	Related Mitigation Measure	MONITORING			VERIFICATION	
		Implementation Entity	Monitoring and Verification Entity	Timing Requirements	Signature	Date
	• Continuous real-time air and dust monitoring shall be conducted during construction activities. **Mitigation Measure 3.2-4: Use Track-Out Dust Control Measures** (Part of Overall Fugitive Dust Control Plan): Track-out dust results when vehicles leave the Project site with residual dirt or dust on the tires or undercarriage of the vehicle. The residual dust becomes deposited on paved road surfaces leaving the subject site and can later be stirred up as airborne dust by subsequent vehicular traffic. To control track-out dust, the following measures shall be continuously implemented: Removal of any visible soil from a paved public roadway at any location where vehicles exit the Project site. • Installation of one or more track-out prevention measures (e.g., bumpers, fenders, wheel wells, etc.). • Inspection and cleaning of vehicle/equipment surfaces that can collect soil (e.g., bumpers, fenders, wheel wells, etc.) prior to leaving the Project site. **Mitigation Measure 3.2-5: Implement Stockpile Dust Control Measures** (Part of Overall Fugitive Dust Control Plan): Dust emissions from excavations, active and inactive soil stockpiles, and other exposed					

Identified Impact	Related Mitigation Measure	MONITORING			VERIFICATION	
		Implementation Entity	Monitoring and Verification Entity	Timing Requirements	Signature	Date
	soil-disturbed areas shall be controlled using measures such as: • Apply water to stockpile two times per day. • Use of a temporary cover (plastic sheeting, tarps, etc.). • Establishing and maintaining a surface crust. • Application of chemical dust suppressants or chemical stabilizers. • Installation of wind barriers around storage piles. • Installation of wind barriers across open areas. • **Mitigation Measure 3.2-6:** Use Excavation Dust Control Measures (Part of Overall Fugitive Dust Control Plan): Excavation activities shall be visually monitored daily for the generation of fugitive dust. If dust is being generated, water shall be applied to the point of disturbance to control dust emissions. In addition, measures such as 1) pre-wetting the ground to depth of anticipated cuts, and 2) application of water prior to any land clearing, would be used to control dust emissions. If wind speeds are high enough to result in dust emissions crossing the Project site boundary or the boundary between the permanent campus and the interim					

Identified Impact	Related Mitigation Measure	MONITORING			VERIFICATION	
		Implementation Entity	Monitoring and Verification Entity	Timing Requirements	Signature	Date
	campus, grading operations will be suspended until wind speeds recede. In the event these measures do not control/suppress fugitive dust emissions from construction activities, the use of contingency measures may be implemented. Measures may include but are not limited to: • Streets adjacent to the Project site shall be swept as necessary to remove accumulated dust and soil using wet power vacuum street sweeper (the use of dry power sweeping is prohibited). • Designated on-site unpaved roadways shall be watered more frequently as necessary to control dust emissions. • Paved public roads adjacent to the site and used by construction equipment shall be washed at the end of each workday. • Minimizing drop heights into dump trucks and/or trailers. **Mitigation Measure 3.2-7:** Conduct Ambient Dust Monitoring (Part of Overall Fugitive Dust Control Plan): Airborne dust monitoring shall be required when earth-disturbing activities are active. The airborne dust monitoring network shall consist of a network of high-volume air sampling instruments that are stationed around the perimeter of the Project site and between the Project site and sensitive receptors, including the Interim Campus. If air					

Identified Impact	Related Mitigation Measure	MONITORING			VERIFICATION	
		Implementation Entity	Monitoring and Verification Entity	Timing Requirements	Signature	Date
	monitoring stations detect levels of airborne dust above the action level, on-site work shall be suspended until such time that the reported levels have declined below action levels. A Community Air Monitoring Plan shall be prepared to provide protocols for fugitive dust management and air monitoring during construction activities at the Site. **Mitigation Measure 3.2-8:** Installation of Air Filtration System: The Mill Valley School District shall incorporate the following measures into the project design for both the interim and permanent campuses. These features shall be submitted and be included on the project drawings submitted for the construction permit: • Installation of high-efficiency particular air (HEPA) air purifiers in the classrooms and a Minimum Efficiency Reporting Value (MERV) pleated particle filters rating of 13 or better air filtration system, in accordance with California Code of Regulations Title 24, Part 6. MERV-13 air filters are considered high efficiency particulate filters able to remove 85 percent of $PM_{2.5}$ from indoor air. MERV-13 filters reduce particulate matter ranging in size from 0.3 to 1.0 micrometers by 50 percent, 1.0 to 3.0 micrometers by 85 percent, and 3.0 to 10 micrometers by 90 percent. HEPA filters can remove at least 99.9 percent of dust, pollen, mold, bacteria, and any airborne particles with					

Identified Impact	Related Mitigation Measure	MONITORING			VERIFICATION	
		Implementation Entity	Monitoring and Verification Entity	Timing Requirements	Signature	Date
	a size of 0.3 to 1.0 micrometers. As part of implementing this measure, an ongoing maintenance plan for the building's HVAC air filtration system shall be required. o The air filters shall be replaced quarterly. o The air filtration system shall meet the following minimal design standards: o A MERV-13, or better, rating that represents a minimum of 85 percent efficiency to capture fine particulates. o At least one air exchange(s) per hour of fresh outside filtered air. o At least four air exchange(s) per hour recirculation. o At least 0.35 air exchange(s) per hour in unfiltered infiltration. o The minimum ventilation volume must be at least 1 cubic foot per minute (cfm) for each 100 square feet of floor area plus 7.5 cfm for each occupant.					
The Interim Campus and construction activities could expose substantial numbers of people to increased odors associated with the WWTP and excavated landfill material, respectively.	**Mitigation Measures 3.2-8,** above, would apply to this impact as well. **Mitigation Measure 3.2-9:** Planting of Vegetation: After completion of construction activities, the Project shall plant trees and other vegetation between sensitive receptors (i.e., interim campus and/or permanent campus) and air pollution sources (i.e., the Sewerage Agency	MVSD Construction Contractor	MVSD Construction Manager			

Identified Impact	Related Mitigation Measure	MONITORING			VERIFICATION	
		Implementation Entity	Monitoring and Verification Entity	Timing Requirements	Signature	Date
	of Southern Marin), as indicated on the Project landscape plan. **Mitigation Measure 3.2-10:** Excavated materials with decaying organic material, or other potentially odorous materials, shall be handled in a manner that avoids impacting residential areas, Mt. Tamalpais United Methodist church, and interim campus, including the following: • Avoid stockpiling potentially odorous materials within 1,000 feet of sensitive land uses. • Odorous stockpiles disposed of at an appropriate landfill.					
BIOLOGICAL RESOURCES						
Loss of active protected bird nesting.	**Mitigation Measure 3.3.1a: Pre-Construction Nesting Bird Surveys and Timing of Tree Removal** The non-breeding season is defined as September 1 to January 31. During this period, breeding is not occurring and surveys are not required. Any trees proposed to be felled should be cut down during non-breeding season, or they could be selected by birds as nesting habitat. If nesting birds are encountered during work activities in the non-breeding season, disturbance activities within a minimum of 50 feet of the nest must be postponed until the young birds have fledged and the nest is vacant. For construction activities that occur between February 1 and August 31, a qualified biologist shall conduct nesting bird surveys no more than 14 days prior to initiation of ground-disturbing	Project Consulting Biologist with expertise in special status rails	MVSD Project Manager/Consulting Biologist	Habitat surveys prior to breeding season; Nesting bird surveys as required in mitigation. Protocol-level rail surveys during breeding season if required; development/approval of noise control plan and implementation of worker awareness training prior to start of construction		

Identified Impact	Related Mitigation Measure	MONITORING			VERIFICATION	
		Implementation Entity	Monitoring and Verification Entity	Timing Requirements	Signature	Date
	activities. Surveys shall be conducted within all suitable habitat within 250 feet of the work area. All active, non-status passerine nests identified at that time shall be protected by a 50-foot radius buffer until all birds have vacated the nest. Trees with active nests cannot be altered or cut until after all birds have vacated. Active raptor or special-status species nests shall be protected by a buffer with a minimum radius of 200-feet. CDFW and USFWS recommend that a minimum 500-foot exclusion buffer be established around active special status species nests. Limits of construction to avoid a nest should be established in the field with flagging and stakes or construction fencing. Construction personnel should be instructed on the sensitivity of the area. Additional surveys would then be conducted if ground-disturbing activities are delayed due to active bird nesting until the qualified biologist determines that the young associated with an active nest have fledged. Survey results are valid for 14 days from the survey date, assuming continuous work. Should ground disturbance activities halt for more than 14 days during nesting season, a nesting survey must be repeated. This is due to the possibility that a lack of activity will allow new birds to construct nests and begin nesting in the project site during that time. If no breeding birds are encountered, then work may proceed as planned. If a new bird nest is found during a repeated nesting bird survey, it is to be buffered and protected in the same manner described above					

Identified Impact	Related Mitigation Measure	MONITORING			VERIFICATION	
		Implementation Entity	Monitoring and Verification Entity	Timing Requirements	Signature	Date
	(i.e. 50-foot buffer for non-special status passerine, 200-foot for raptor or special-status). Exclusion zone sizes may vary, depending on habitat characteristics and species, and are generally larger for raptors and colonial nesting birds. Each exclusion zone would remain in place until the nest is abandoned or all young have fledged. **Mitigation Measure 3.3.1b: Construction Employee Environmental Awareness Training** The Project applicant/construction contractor shall retain a qualified biologist to conduct environmental awareness training for construction crews before project implementation. The awareness training shall be provided to all construction personnel and shall brief personnel on the need to avoid effects on sensitive biological resources (especially bird nests or birds that could disperse onto the Project Site from adjoining properties). The education program shall include a brief review of the special-status species with the potential to occur in the Project area (including their life history, habitat requirements, and photographs of the species). The training shall identify the portions of the Project area in which the species may occur, as well as their legal status and protection. The program shall also cover the relevant permit conditions and mitigation measures that must be followed by all construction personnel to reduce or avoid effects on these resources during project implementation through completion. The training shall emphasize the role that the construction					

Identified Impact	Related Mitigation Measure	MONITORING			VERIFICATION	
		Implementation Entity	Monitoring and Verification Entity	Timing Requirements	Signature	Date
	crew plays in identifying and reporting any special-status species observations to the on-site biologist. Training shall identify the steps to be taken if a special-status species is found within the construction area (i.e., notifying the crew foreman, who would call the designated biologist). An environmental awareness handout that describes and illustrates sensitive resources to be avoided during project construction and identifies all relevant permit conditions shall be provided to each crew member. The crew foreman shall be responsible for ensuring that crew members adhere to the guidelines and restrictions. Education programs shall be conducted for appropriate new personnel as they are brought on the job. ***Mitigation Measure 3.3.1c (California Ridgeway's Rail and California Black Rail Surveys and Avoidance):*** A qualified biologist shall survey for, and map, potential California Ridgeway's Rail (CRR) and California Black Rail (CBR) habitat within 700 feet of any proposed construction at the Sycamore Avenue site. If no such habitat is encountered, no additional mitigation is required. If potential nesting habitat is identified within 700 feet of proposed construction areas, protocol-level surveys using the 2017 USFWS Site-Specific Survey Protocol shall be conducted, and survey results shall be submitted to CDFW. If no nesting					

Identified Impact	Related Mitigation Measure	MONITORING			VERIFICATION	
		Implementation Entity	Monitoring and Verification Entity	Timing Requirements	Signature	Date
	CRR or CBR are encountered, no additional measures are required. If breeding CRR or CBR are identified in the annual breeding season surveys, work done during the breeding season within 700 feet of CBR and CRR occupied nesting habitat shall not cause noise levels exceeding 10 decibels (dBA) over existing ambient noise levels. If noise levels are determined to exceed 10 dBA, the applicant shall prepare a noise and visual avoidance plan (including barriers) and obtain CDFW's written approval of the plan and implement the CDFW-approved plan, prior to conducting noise-generating Project activities. **Mitigation Measure 3.3.1d: *Demolition Construction Monitoring*** A qualified biologist shall be present during demolition of the existing school buildings. The Biologist will ensure that all previously identified buffers are enforced, and will monitor the marsh for signs of disturbance by species inhabiting them. Signs of disturbance include but are not limited to: • Vocalization: Birds may call repeatedly and loudly, with different pitches, volume, and pattern than their normal calls. • Posturing: Birds may puff up their chest feathers and attempt to appear threatening. • Other distressed behavior includes dive-bombing, feigning injury (to lead potential predators away from					

Identified Impact	Related Mitigation Measure	MONITORING			VERIFICATION	
		Implementation Entity	Monitoring and Verification Entity	Timing Requirements	Signature	Date
	nests), and unusual behavior as identified by the biologist. The Biologist shall stop work at any time they observe distressed birds that could be in the area. This excludes common naturalized but invasive species such as the European Starling (*Sturnus vulgaris*), House Sparrow (*Passer domesticus*), and Rock Pigeon (*Columba livia*). The biologist shall then identify the species of bird and if required, establish a suitable work buffer from the area the bird was identified.					
The Project could impact wetlands and "other waters of the United States".	***Mitigation Measures 3.8.1a, 3.8.1b, and 3.8.1c*** in the Hydrology and Water Quality chapter would reduce impacts to wetland habitats to a less than significant level.					
The Project could conflict with local policies or ordinances protecting biological resources.	***Mitigation Measure 3.3.3:*** The Project shall avoid the removal or damage of any trees of protected or heritage class (as defined in Mill Valley Municipal Code Section 20.67) to the extent possible. Five redwood trees of heritage-class have been identified within the Project Area (not within the specific construction footprint, but on the MVMS campus). One redwood tree has been identified that is smaller than the size threshold for protection. One protected black oak also was identified on the site. If heritage or protected-class tree removal is required, the Project landscape plan shall include suitable replacement tree plantings in conformance with tree replacement guidelines set forth in the City's Ordinance, or as determined appropriate by a qualified arborist.					

Identified Impact	Related Mitigation Measure	MONITORING			VERIFICATION	
		Implementation Entity	Monitoring and Verification Entity	Timing Requirements	Signature	Date
GEOLOGY, SOILS, AND SEISMICITY						
The Project could directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking.	***Mitigation Measure 3.5.1:*** The District shall implement all recommendations outlined in Ninyo and Moore's Geotechnical Evaluation and Geologic Hazard Assessment Report, including but not limited to seismic design criteria, soils mixing measures, construction monitoring recommendations, excavation and earthwork recommendations, retaining walls, drainage, and foundation recommendations. The District shall also implement any recommendations provided by any future supplemental geotechnical engineering report(s) during development of the Project.	MVSD Project Manager	Project geotechnical engineer	Prior to submittal of final design plans to Division of the State Architect		
HAZARDS, HAZARDOUS MATERIALS, AND WILDFIRE						
The Project could expose students and staff at the Interim Campus to hazardous materials/health risks during construction of the Permanent Campus.	***Mitigation Measure 3.7-1.*** The Project Site shall be subject to mitigation as required by DTSC and the LEA in the Response Plan and/or the Post Closure Land Use Plan (PCLUP). The PCLUP shall include construction safety protocols and requirements, including preparation of a Health and Safety Plan, a Community Air Monitoring Plan, and measures for safe excavated waste handling. The PCLUP will also specify foundation design for the Interim Campus. In addition, the following measures shall be implemented to protect students and staff from contact with hazardous materials in the soil: • To the maximum extent feasible, grading and soils work shall be conducted during the	MVSD Project Manager	MVSD Construction Manager	Ongoing during project construction		

Identified Impact	Related Mitigation Measure	MONITORING			VERIFICATION	
		Implementation Entity	Monitoring and Verification Entity	Timing Requirements	Signature	Date
	summer months when no students, and minimal staff are present. • The noise wall specified in Mitigation 3.9-2 shall be constructed prior to any earthwork being initiated. • All work areas shall be fenced to prevent unauthorized access. • All unpaved areas on the interim campus to which students may have access shall be capped with asphalt or clean soil prior to student occupancy. • Construction best management practices such as wetting of all soils during earthwork and other soil disturbing activities, covering of stockpiles, and other methods to minimize generation of fugitive dust. • Continuous real-time air and dust monitoring shall be conducted on an ongoing basis during construction activities. • Soil Management Plan (SMP) or equivalent document shall be prepared by a qualified environmental consultant to ensure contaminated soils within the construction grading footprint are properly identified, excavated, and managed in accordance with applicable regulations, including for off-site disposal. The SMP shall be implemented during any grading, excavation, or other soil disturbance work. Elements of the SMP shall include:					

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	○ A qualified environmental consultant shall be present on the Project site during grading, excavation, and/or other soil disturbance activities in the known or suspected locations of landfill wastes and/or contaminated soils. The environmental consultant will monitor compliance with the SMP and actively monitor the soils and excavations for evidence of contamination. ○ The SMP shall require the timely testing and sampling of soils so that contaminated soils can be properly managed. The SMP shall specify the testing parameters and sampling frequency. ○ During the Project's soil disturbance phase, the District's construction contractor shall remove and properly dispose of contaminated materials in accordance with the provisions of the SMP. If soil is stockpiled prior to disposal, it will be managed in accordance with the Project's SMP and Storm Water Pollution Prevention Plan (SWPPP), prior to its transfer for disposal. All contaminated soil shall be properly disposed of. ○ Contaminated soils transported from the Project site shall be transported by an appropriately licensed transporter and disposed of at an authorized disposal or treatment facility.					

Identified Impact	Related Mitigation Measure	MONITORING			VERIFICATION	
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The Project could expose students and staff at the Interim Campus to hazardous materials/health risk during school operations.	**Mitigation Measure 3.7-2.** District shall conduct another round of sub-slab vapor sampling. The sample results shall be incorporated into an updated HHRA, upon which the Mitigation Plan and/or PCLUP shall be developed. The District shall prepare and implement a Mitigation Plan and/or PCLUCP for the Project Site in consultation with DTSC and/or the LEA that ensures that potential risks are managed in accordance with environmental agency regulations, standards and guidance such that, with mitigation measures (if any), risks are below the benchmark thresholds. The Project Site shall be subject to mitigation as required by the Mitigation Plan and/or the Post Closure Land Use Plan (PCLUP) that will ensure that, with mitigation measures (if any), health risks are below the benchmark thresholds. The PCLUP shall include construction safety protocols and requirements, including preparation of a Health and Safety Plan, a Community Air Monitoring Plan, and measures for safe excavated waste handling. The PCLUP will also specify foundation design for the Interim Campus. These Plans shall include, at a minimum, placement of an effective cap over the disturbed portion of the landfill, installation of a VIMS, and land use restrictions. These plans shall also include requirements for post-closure maintenance and monitoring including monitoring and inspection specifications and frequencies, cap-integrity measures, and drainage	MVSD Hazardous Materials Consultant	MVSD Project Manager	Prior to start of construction		

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		Implementation Entity	Monitoring and Verification Entity	Timing Requirements	Signature	Date
	and erosion control measures. • For new buildings, the Project shall install a passive VIMS with the option to be converted to active, which shall include, at a minimum: • A geomembrane or equivalent system with low permeability to landfill gas and VOCs shall be installed between the concrete floor slab of the building and subgrade. • A permeable layer of open graded material of clean aggregate with a minimum thickness of 12 inches shall be installed between the geomembrane and the subgrade and slab. • A geotextile filter shall be utilized to prevent the introduction of fines into the permeable layer. • Perforated venting pipe shall be installed within the permeable layer, and shall be designed to operate without clogging. • The venting pipe shall be constructed with the ability to be connected to an induced draft exhaust system. • Automatic methane gas sensors shall be installed within the permeable gas layer, and inside the building to trigger an audible alarm when methane gas concentrations are detected above an established threshold.					

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	• For existing buildings, the Project shall install a sub-slab depressurization system, which may vary in design but shall include, at a minimum: • Sub-slab suction points with piping sealed to the slab with air-tight fittings and/or durable sealing material. • Sealed floor and wall cracks • Blowers to depressurize the subsurface below the foundation and aboveground piping to exhaust sub-slab vapor above the building roof.					
Renovation of the Main Building could expose workers and nearby students and staff to hazardous materials.	**Mitigation Measure 3.7-4.** Prior to any renovations or demolition, all ACMs identified in the 2025 SCA Report that are subject to damage or which will be made friable shall be removed by qualified removal experts using appropriate equipment and methods as required by the BAAQMD and the Asbestos National Emissions Standards for Hazardous Air Pollutants (NESHAP). ***Mitigation Measure 3.7-5***. Dust control procedures shall be required during demolition/renovation of elements with any measurable lead content to comply with the Cal/OSHA regulations under 8 CCR 1532.1. As lead was identified in most paints and a detailed inventory of paints was not performed for the project, for the purpose of complying with the Cal/OSHA lead in construction regulation (8	MVSD Construction Contractor	MVSD Construction Manager	Prior to, and during demolition, as specified in the measures.		

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	CCR 1532.1), all coated surfaces shall be considered to contain some lead and require demolition dust control procedures for compliance with Cal/OSHA's Construction Lead Standard under 8 CCR 1532.1. The aforementioned regulation contains requirements for lead air monitoring, work practices, respiratory protection, etc., that are triggered by the presence of even very low levels of lead. In addition, based on the California TTLC hazardous waste standard, some paints, ceramic tiles, and other building materials may be classified as hazardous wastes. These materials shall be segregated from the general demolition debris, characterized, and managed in accordance with applicable federal and state laws and regulations. Additional sampling and analysis for leachable lead content by the Contractor during demolition will be required for waste characterization if sampled material has a total lead concentration equal to or above 50 mg/kg. Disposal of these materials may be as RCRA or California hazardous waste based on the results of analytical waste characterization data. None of the applicable regulations require removal of lead paint prior to renovation if the paints are securely adhered to the substrates (i.e., non-flaking or non-peeling). Disposal of the demolition debris in this case can be handled as non-hazardous waste after the loose and flaking paint have been removed, as long as demolition					

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	practices do not compromise worker safety and the waste stream is verified by the Contractor's waste characterization sampling. Conventional demolition techniques shall be employed for all painted surfaces with the Contractor complying with applicable OSHA and Cal/OSHA statutes regarding: • Worker awareness training; • Exposure monitoring, as needed; • Medical examinations, which may include blood lead level testing; and • Establishing a written respiratory protection program. ***Mitigation Measure 3.7-6***. One material is assumed to be PCB-containing (i.e., >50 ppm), pending destructive testing or visual examination prior to demolition: PCB hydraulic fluids associated with the elevator equipment. his material will require sampling and waste profiling or visual examination during demolition of the building or removal of the material. Until sampling can be performed to determine PCB content, this material shall be assumed to contain > 50 ppm PCBs. The contractor shall examine the lighting ballasts during the demolition process. If a "No PCBs" stamp is absent, the ballast should be assumed to contain PCBs. All PCB hazardous wastes (if identified) shall be disposed of in accordance with Federal (Toxic Substances Control Act), State, and local regulations.					

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	Mitigation Measure 3.7-7. Fluorescent light tubes were observed throughout the space. Fluorescent light tubes shall be either disposed of as hazardous waste, or recycled for mercury content in accordance with applicable law and regulation. All Freon shall be evacuated from AC units by trained professionals prior to demolition or replacement. The Freon shall be properly reclaimed for reuse.					
HYDROLOGY AND WATER QUALITY						
Impacts on Water Quality	***Mitigation Measure 3.8.1a:*** The Project applicant shall file an NOI to comply with the Construction General Permit with the San Francisco Bay RWQCB prior to construction. Individual SWPPPs shall be prepared for the Interim Campus and the permanent campus, and shall detail the treatment measures and BMPs to control pollutants that shall be implemented and complied with during the construction and post-construction phases of the project. The SWPPPs are subject to approval by the San Francisco Bay RWQCB, which makes the final determination on which BMPs are required for the Project. ***Mitigation Measure 3.8.1b****:* Prior to the issuance of grading permits for the Project, the Project applicant shall submit a Stormwater Control Plan to the Marin County STOPP for review and approval. The Stormwater Control Plan shall identify pollution prevention measures and practices to prevent polluted runoff from leaving	MVSD Project Manager	MVSD Project Manager/ Project Civil Engineer	Prior to issuance of grading permits/start of grading		

Identified Impact	Related Mitigation Measure	MONITORING			VERIFICATION	
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	the Project site. The plan shall be implemented to the satisfaction of Marin County STOPP prior to building occupancy. ***Mitigation Measure 3.8.1c:*** Prior to the issuance of grading permits for the Project, the Project applicant shall submit a final drainage plan as prepared by a qualified civil engineer to the City of Mill Valley for review and approval. The approved plan shall be incorporated into the Project design and constructed to the satisfaction of the City.					
NOISE						
Construction and operation of the Project could increase noise levels at the Interim Campus.	**Mitigation Measure 3.9.1.** The Construction Contractor shall coordinate with the school principal or site administrator to restrict high noise producing activities (i.e., site grading, demolition, truck deliveries, etc.) to only occur at times that minimize disruption to school activities. Coordination shall continue on an as-needed basis throughout the construction phase of the Project to reduce school disruptions from construction activities. **Mitigation Measure 3.9.2.** Prior to the start of construction activities at MVMS, the Construction Contractor shall install a temporary 16-foot-tall1 construction noise barrier as close as feasible to the construction of the new campus to block the line of sight between the construction footprint and the nearest interim campus buildings directly to the east. The noise barrier shall be equipped with exterior-rated quilted sound blankets that are a minimum of 2 inches thick. (see Figure 16 for the proposed	Project Construction Manager	MVSD Project Manager	During construction		

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	location of the 16-foot-tall construction noise barrier). **Mitigation Measure 3.9-3.** The District shall ensure that all interim classroom buildings have adequate HVAC systems so that windows and doors can be kept closed when school instruction is occurring during nearby construction. **Mitigation Measure 3.9-4:** To minimize disruption and potential annoyance during construction, the Construction Contractor shall implement the following construction noise reduction measures: o All construction equipment shall be properly maintained and in good order. o Locate staging areas at the greatest feasible distances away from the interim campus. o Locate stationary noise-generating equipment (e.g., generators, air compressors) at the greatest feasible distances away from the interim campus. Require that all construction equipment powered by gasoline or diesel engines have sound control devices (i.e., mufflers) that are at least as effective as those originally provided by the manufacturer and that all equipment be operated and maintained to minimize noise generation.					