
**INITIAL STUDY/
MITIGATED NEGATIVE DECLARATION FOR THE
TAMALPAIS HIGH SCHOOL STEAM BUILDING REPLACEMENT
PROJECT**

Prepared for:

Tamalpais Union High School District
395 Doherty Drive,
Mill Valley, CA 94939

Prepared by:

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January 2024

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ACRONYMS AND ABBREVIATIONS

Acronym/Abbreviation	Definition
BMP	Best Management Practice
CARB	California Air Resources Board
FEMA	Federal Emergency Management Agency
CO	carbon monoxide
CO2E	carbon dioxide equivalent
GHG	greenhouse gas
gpd	gallons of wastewater per day
LOS	level of service
mgd	million gallons per day
MCSTOPPP	Marin Countywide Stormwater Pollution Prevention Program
MLD	Most Likely Descendant
MMWD	Marin Municipal Water District
NAHC	Native American Heritage Commission
NOx	nitrogen oxides
NPDES	National Pollutant Discharge Elimination System
OHP	State Office of Historic Preservation
O3	ozone
PM10	particulate matter less than 10 microns
PM2.5	particulate matter less than 2.5 microns
RWQCB	Regional Water Quality Control Board
SCH	State Clearinghouse
SCWA	Sonoma County Water Agency
SOx	sulfur dioxide
SASM	Sewerage Agency of Southern Marin
SWPPP	Stormwater Pollution Prevention Plan
TAC	toxic air contaminant
TMDL	Total Maximum Daily Load
VOC	volatile organic compound
ZWM	Zero Waste Marin

ENVIRONMENTAL DETERMINATION

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED: The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a “Potentially Significant Impact” as indicated by the checklist on the following pages.

	Aesthetics		Greenhouse Gas Emissions		Public Services
	Agricultural and Forestry Resources	X	Hazards and Hazardous Materials		Recreation
X	Air Quality		Hydrology/Water Quality		Transportation/ Traffic
X	Biological Resources		Land Use/Planning		Tribal Cultural Resources
X	Cultural Resources		Mineral Resources		Utilities/Service Systems
	Energy		Noise		Wildfire Hazards
	Geology/Soils		Population/Housing	X	Mandatory Findings of Significance

DETERMINATION: On the basis of this initial evaluation:

I find that the proposed Project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.	
I find that although the proposed Project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the Project have been made by or agreed to by the Project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.	X
I find that the proposed Project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.	
I find that the proposed Project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.	
I find that although the proposed Project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed Project, nothing further is required.	

Michael Woolard, Senior Director of Facilities Planning, TUHSD

Date

ENVIRONMENTAL DETERMINATION

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED: The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a “Potentially Significant Impact” as indicated by the checklist on the following pages.

	Aesthetics		Greenhouse Gas Emissions		Public Services
	Agricultural and Forestry Resources	X	Hazards and Hazardous Materials		Recreation
X	Air Quality		Hydrology/Water Quality		Transportation/ Traffic
X	Biological Resources		Land Use/Planning		Tribal Cultural Resources
X	Cultural Resources		Mineral Resources		Utilities/Service Systems
	Energy		Noise		Wildfire Hazards
	Geology/Soils		Population/Housing	X	Mandatory Findings of Significance

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Michael Woolard

Michael Woolard, Senior Director of Facilities Planning, TUHSD

2/9/2024

Date

I. INTRODUCTION

This Initial Study and Mitigated Negative Declaration (IS/MND) has been prepared by the Tamalpais Union High School District (TUHSD or District), 395 Doherty Drive, Mill Valley, CA, pursuant to the California Environmental Quality Act (CEQA) statutes¹ and Guidelines². It provides documentation to support the conclusion that the proposed Tamalpais High School STEAM Building Replacement Project (“the Project”), with mitigation identified herein, would not cause a potentially significant impact to the physical environment. The proposed project is located at Tamalpais High School, 700 Miller Ave, in the City of Mill Valley.

This IS/MND describes the location of the project site, the project objectives, and the details of the proposed project. The Environmental Checklist Form included as Appendix G of the CEQA Guidelines serves as the basis for the environmental evaluation contained in the IS/MND. The Checklist Form examines the specific potential project-level physical environmental impacts that may result from the construction and operation of the proposed new and expanded facilities onsite. Mitigation measures have been identified to reduce any potentially significant impacts that would otherwise occur with development and operation of the new facilities to a less-than-significant level.

The District will serve as the “lead agency” (the public agency that has the principal responsibility for carrying out and/or approving a project) for the proposed project. The District’s Board of Trustees is responsible for ensuring that the environmental review and documentation meet the requirements of CEQA. The Draft IS/Notice of Intent to adopt an MND will be circulated for a 30-day public review period from January 30 through March 1, 2024.

Should the District approve the project, it would be required to file a “Notice of Determination” for posting by the County Clerk and the State Clearinghouse. The filing of the notice and its posting starts a 30-day statute of limitations on court challenges to the CEQA review of the Project.

Document Organization

This document is organized into the following sections:

SECTION I – INTRODUCTION: Provides background information about the project.

SECTION II – PROJECT DESCRIPTION: Includes project background and detailed description of the project.

SECTION III – INITIAL STUDY CHECKLIST AND DISCUSSION: Reviews the proposed project and states whether the project would have potentially significant environmental effects.

¹ Public Resources Code Sections 21000 et seq.

² Title 14, Section 15000 et seq. of the California Code of Regulations

SECTION IV – MANDATORY FINDINGS OF SIGNIFICANCE: States whether environmental effects associated with development of the proposed project are significant, and what, if any, added environmental documentation may be required.

SECTION V – REFERENCES: Identifies source materials that have been consulted in the preparation of the IS.

SECTION VI – REPORT PREPARERS: Identifies the firms and individuals who prepared the IS.

APPENDICES: Includes technical reports, comments and responses on the Draft IS, and Mitigation Monitoring and Reporting Program.

II. PROJECT DESCRIPTION

Project Name:	Tamalpais High School STEAM Building Replacement Project
Project Location:	700 Miller Ave Mill Valley, CA 94961
Project Applicant and Lead Agency	Tamalpais Union High School District 395 Doherty Drive Mill Valley, CA 94939 Attn Michael Woolard, Facilities Director: 415-945-1020
General Plan Designation:	C-F (Community Facilities)
Zoning:	C-F (Community Facilities)
Project Approvals:	TUHSD approval. Review of facilities by Division of the State Architect for structural, fire and life safety, and ADA accessibility.
Date Initial Study Completed:	January 30, 2024

PROJECT DESCRIPTION

Project Objectives

The primary Project objective is to enhance the student educational experience at Tamalpais High School by constructing innovative classrooms and diverse indoor and outdoor learning spaces. These environments would be carefully designed to cater to the specific needs of educational programs, incorporating modern design, optimal lighting, and other physical amenities.

The Project also has the goal of establishing a connection between the new buildings and the natural landscape, fostering a sense of place and connection to the environment. The Project includes placing three buildings and a bridge to address topography and program adjacencies while ensuring the preservation of larger existing trees. Furthermore, the Project would replace aging utilities in this part of the school.

Project Location and Surrounding Land Uses

Tamalpais High School is located at 700 Miller Ave in the City of Mill Valley (see Figures 1 and 2). The school is bordered by single-family residences along Gomez Way and Homestead Boulevard to the west and south. A retirement home/skilled nursing facility and single-family residences lie along Miller Ave to the north. A school athletic field lies to the east of the site, and further east a seasonal wetland area and an inlet feeds into marshes abutting Richardson Bay.

The Project site comprises approximately 3 acres of the overall 25-acre Tamalpais High School campus (see Figure 3). The campus is currently developed with a variety of one-, two- and three-story buildings, modular classrooms and administrative structures; concrete and asphalt pedestrian areas; open lawns; and asphalt parking lots.

Existing Site Conditions and Facilities

Tamalpais High School has an enrollment of approximately 1,321 students and was originally built in 1907. The school campus consists of a combination of one-, two- and three-story structures, asphalt and concrete play areas, concrete walkways, a pool, and an athletic field. The northern end of the campus was constructed on a series of cut and fill slopes and some of the structures date back to the early 1900s. The southwest corner of the campus would be redeveloped by the Project, with the demolition of existing buildings and construction of new buildings, a connecting bridge, and landscape features. Existing facilities in that area are a terraced amphitheater, parking area, as well as Woodruff Hall, Greenwood Hall, and Benefield Hall. Currently, these buildings are used for instruction in mathematics, music and as a storage area, respectively. A portable science classroom building and a storage garage are also present. Vegetation throughout the campus generally consists of grasses, landscaped planters and sporadic adolescent and mature trees.

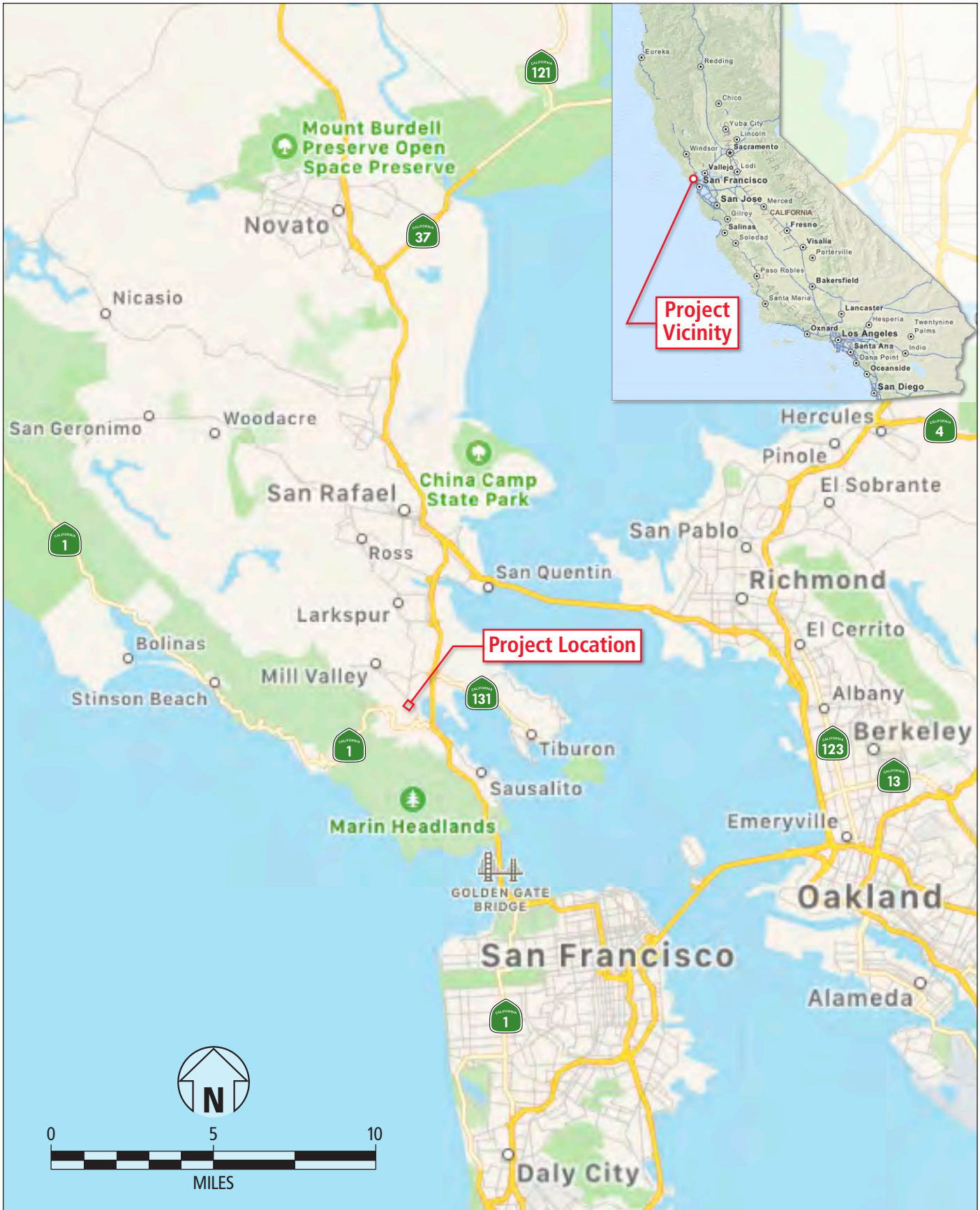


Figure 1
Project Location

Source: TomTom Maps and Grasetti Environmental



Figure 2
Project Vicinity

Source: TomTom Maps and Grasetti Environmental



Figure 3
Project Development, Grading, and Landscape Plan

Proposed School Reconstruction

The Project encompasses the demolition and construction of several key facilities constructed in the southwestern corner of the Tamalpais High School campus, as shown on Figure 4.

The Project would demolish approximately 29,000 square-feet of buildings including Building M (15,037 sq. ft.), Building N (6,580 sq. ft.), Building U (1627 sq. ft.), Building T (2,208 sq. ft.), Building Q (1608 sq. ft.), and two portables (total 1,920 sq. ft.). Within these buildings proposed for demolition are eleven classrooms, a music center and a photography center. Greenwood Hall currently houses the music center and the photography center. Benefield Hall is currently used as storage structure. Woodruff Hall contains ten math classrooms, and the portable science classroom building is used as a single classroom.

Temporary classrooms totaling approximately 14,400 square-feet would be constructed on the existing tennis courts on the east side of the campus, adjacent to the existing athletic field (See Figure 5). The use and square footage of the classrooms are shown below in Table PD-1:

Table PD-1: Temporary Classrooms and Facilities Overview

Use	Quantity	Dimensions (feet)
Math	8	48'x40'
Science Lab	1	36'x40'
Music	1	48'x40'
Art/Photo Lab	1	36'x40'
Classroom	1	24'x40'
Restroom Portable	1	12'x40'
Total Sq. Ft.		21,600

Permanent construction would include a Music Building, Science, Math, and Art Classroom Building, and Auto Shop Building. Building A, the Music Building, would be approximately 7,487 square-feet, while Building B, a 4-story Science, Math, and Art Classroom Building, would be approximately 30,674 square-feet. Building C, the Auto Shop building, would be approximately 4,921 square feet. A total of eleven classrooms would be constructed in the Science, Math, and Art Classroom Building to compensate for the removal of eleven classrooms during demolition.

The Project also includes the construction of a covered pedestrian bridge between the new Music Building (Building A) and the fourth story of the new classroom building (Building B) spanning 892 square feet.

Ancillary improvements would include concrete and asphalt pedestrian areas, covered walkways, site utilities, and landscaping. New trees planted would include evergreen native trees and flowering native trees. New trees would be planted in the southwestern corner of the campus within the area of proposed demolition and building construction. The trees south of the existing student center would be preserved as a pine grove and excluded from building development.



Figure 4
Proposed Building Demolition and Remodeling Locations

Source: Tamalpais Union High School District

The Project would be constructed in three phases. Phase I would first install the temporary classrooms in the eastern corner of campus and then demolish the existing buildings in the southwest corner of the campus. Site work also would be completed in this phase. Site work would include grading to level and contour the underlying soil as well as utility installation, involving the identification and marking of existing utilities lines for electricity and water. Phase II would entail the construction of the Buildings A, B, and C and the bridge.

Phase III would include paving work, landscaping, removal of the temporary classrooms, and the restoration of the parking area and tennis courts.

Infrastructure Connections

Utility service to the new buildings would be provided via connections to existing on-campus water, sewer, gas, and electrical lines that currently serve the buildings on the site.

Days and Hours of Operation

The Project would not change or expand any hours or days of use of the school compared to existing use operating hours.

School Uses Capacity

The Project would not change or expand any uses of the school compared to existing use types and levels. There would be no change in student enrollment or staffing from the Project.

Parking

Construction of the Project would result in a permanent reduction in approximately 30 parking spaces from the southwest corner of campus and from the east parking lot. At the site of the temporary classrooms at the eastern area of the campus the Project would construct 47 temporary parking spaces for use during construction. During the construction period, accessible parking, including van parking, would be constructed at the proposed temporary parking area adjacent to the temporary classrooms, as well as in the existing east parking lot.

Tree Protection, Planting and Removal

A Tree Inventory was prepared for the school on September 30, 2023 by ArborScience LLC³. Twenty-three existing trees would be removed, and 76 new trees would be planted, as well as shrubs and ground cover. In the area of planned building demolition and construction in the southwest area of campus, three trees qualify as heritage-sized trees. The Project would not remove any mature, heritage-sized trees. Generally, the Project would remove trees that are hazardous, fire-prone, or in generally poor condition. The trees to remain would be primarily oaks

³ ArborScience, LLC. Tree Inventory, Tamalpais High School 700 Miller Ave, Mill Valley, California. September 30, 2023.

and redwoods that have better tolerance for construction. Figure 3, Project Development, Grading, and Landscape Plan, shows the proposed landscape plan.

Grading and Earthwork

Grading would be minimal and balanced on the site; no off-haul or import of materials is anticipated.

Drainage and Runoff

Runoff from the Project site currently drains into the campus drainage system, which connects into the City of Mill Valley storm drainage system. The project would decrease impervious surfaces and thereby not increase potential peak runoff.

Construction Schedule, Equipment, Workers, and Hours

Construction Schedule. The Project would consist of 3 phases beginning in June 2024 and running through August of 2026. The phases include:

Phase I – Installation of temporary classrooms, demolition and site work (site grading and utilities installation): 2 months for construction of temporary classrooms, 5 months for building demolition and site work.

Phase II – Building construction: 8 months.

Phase III – Paving/parking and tennis court restoration, landscaping, removal of temporary classrooms: 1 month.

Equipment Use. Equipment used during construction would vary by phase, but would include excavators, backhoes, skid steers, dump trucks, grading machines, compaction equipment, water trucks, concrete trucks, concrete pumps, cranes and various boom lifts and power equipment for building construction.

Construction Workers. Up to 25 construction workers would be on-site on an average day.

Construction Hours. Typical construction hours would be 7:00 a.m. to 6:00 p.m. on weekdays with heavy equipment use restricted to the hours of 8:00 a.m. to 6:00 p.m., and on Saturdays between the hours of 9:00 a.m. and 5:00 p.m., consistent with the City of Mill Valley Noise Ordinance.

Staging Areas. Construction staging would be located entirely on paved areas on the campus near the Project site.

III. INITIAL STUDY CHECKLIST

The initial study checklist recommended by the CEQA Guidelines is used to describe the potential impacts of the proposed Project on the physical environment.

I. Aesthetics

Would the Project:

Environmental Issue	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect on a scenic vista?			X	
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?			X	
c) In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?			X	
d) Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?			X	

Discussion

a, c) The Project would construct buildings of similar scale as the existing school buildings. The music building and 4-story classroom building would be taller than the existing buildings to be demolished, but would not block or impede any views, or substantially change the character of this part of the school campus. The base elevation of the 4-story classroom building would be situated near the bottom of a sloped area in the southwest corner of the campus, which would minimize the perceived height of the structure.

Figure 6 shows the view of the southwest area of the campus, the area of proposed building demolition and replacement, looking east from the intersection of Homestead Blvd and Gomez Way. Figure 6 also shows the view of the tennis courts, the area of the proposed temporary classrooms, looking southwest from Miller Avenue. The school buildings are visible from Homestead Boulevard and Almonte Boulevard. Views would not

be substantially altered from existing views of the school and athletic field. Views of Tamalpais High School from Stadium Ave are limited due to a fence and trees lying between the road and the school. The Project would remove 23 trees from the site but would replace them with a larger number of new trees and additional landscaping. Therefore, the Project would have a **less than significant** impact on scenic vistas or scenic resources.

- b) There are no rock outcroppings, historic buildings, or scenic highways on the Project site. The section of US Highway 1 nearest to the Project area is designated as a scenic highway⁴, however, the Project would not be visible from the highway due to the distance of 0.5 miles between Highway 1 and the Project site. The school campus is visible from the Richardson Bay crossing of Highway 101, but the distance between the campus and the crossing exceeds 0.75 miles. This specific stretch of Highway 101 is not classified as a scenic highway. Furthermore, the existing buildings not subject to demolition serve as a barrier between the highway and the buildings slated for demolition, thereby further diminishing any potential visual impact. Considering these factors, the overall impact of the Project on the visual landscape is expected to be minimal. Therefore, the Project's impact would be **less than significant**.

- d) The proposed exterior safety lighting for the reconstructed school buildings would be similar to existing exterior lighting in this area of the school. Exterior lighting would be shielded and directed to minimize light and glare spillage. Therefore, the Project's light and glare impact would be **less than significant**.

⁴ <https://www.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aaca>



Intersection of Homestead Boulevard and Gomez Way Looking East



Miller Avenue Looking Southwest Towards Tennis Courts

Figure 6
Existing Views

Source: Grasseti Environmental Consulting

II. Agricultural and Forestry Resources

Would the Project:

Environmental Issue	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?				X
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?				X
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?				X
d) Result in the loss of forest land or conversion of forest land to non-forest use?				X
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?				X

Discussion

a-e) The Project site is developed with existing school facilities, including existing buildings and an athletic field. There are no existing or designated agricultural or forested lands on or in the vicinity of the school campus. The site is not under Williamson Act contract. Therefore, the Project would not result in the conversion of farmland or forestland to non-agricultural uses and would have **no impact** on agricultural or forest resources.

III. Air Quality

Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:

Environmental Issue	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Conflict with or obstruct implementation of the applicable air quality plan?			X	
b) Result in a cumulatively considerable net increase of any criteria for which the Project region is non-attainment under an applicable federal or state ambient air quality standard?		X		
c) Expose sensitive receptors to substantial pollutant concentrations?			X	
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?			X	

Background

This section describes construction and operational air quality impacts associated with the project and is consistent with the methods described in the Bay Area Air Quality Management District (BAAQMD) *CEQA Air Quality Guidelines* (April 2023).

The air quality analysis includes a review of criteria pollutant emissions such as carbon monoxide (CO), nitrogen oxides (NO_x), volatile organic compounds (VOC) as reactive organic gases (ROG), particulate matter less than 10 micrometers (coarse or PM₁₀), and particulate matter less than 2.5 micrometers (fine or PM_{2.5}).

The United States Environmental Protection Agency (USEPA) has established National Ambient Air Quality Standards (NAAQS) under the Clean Air Act (CAA) for the criteria pollutants and California Air Resources Board (CARB) has established California Ambient Air Quality Standards (CAAQS). Air basins where NAAQS and/or CAAQS are exceeded is designated as a “nonattainment” area. If standards are met, the area is designated as an “attainment” area.

The Project site is located within the San Francisco Bay Area Air Basin (Air Basin) under the jurisdiction of the BAAQMD. The BAAQMD is the local agency responsible for the administration and enforcement of air quality regulations for the area. The Bay Area is currently designated “nonattainment” for state and national (1-hour and 8-hour) ozone standards, for the state PM₁₀ standards, and for state and national (annual average and 24-hour) PM_{2.5} standards. The Bay Area is designated “attainment” or “unclassifiable” with respect to the other ambient air quality standards.

Discussion

a) The BAAQMD *2017 Clean Air Plan/Regional Climate Protection Strategy (CAP/RCPS)*, which provides a roadmap for BAAQMD’s current and planned efforts to reduce air pollution and protect public health and the global climate. The 2017 *CAP/RCPS* identifies potential rules, control measures, and strategies that BAAQMD can pursue to reduce GHG in the Bay Area. Determination of whether a project supports the goals in the 2017 *CAP/RCPS* is achieved by a comparison of project-estimated emissions with BAAQMD thresholds of significance. If project emissions would not exceed the thresholds of significance after the application of all feasible mitigation measures, the project is considered consistent with the goals of the 2017 *CAP/RCPS*. As presented in the subsequent impact discussions, the project would not exceed the BAAQMD significance thresholds; therefore, it would support the primary goals of the 2017 *CAP/RCPS* and would not hinder implementation of any of the control measures. Therefore, this impact would be **less than significant**.

b) **Construction Impacts**

Project construction would generate short-term emissions of air pollutants, including fugitive dust and equipment exhaust emissions. The BAAQMD *CEQA Air Quality Guidelines* recommend quantification of construction-related exhaust emissions and comparison of those emissions to significance thresholds. CalEEMod (California Emissions Estimator Model Version 2022.1.1.20) was used to quantify construction-related pollutant emissions (CAPCOA, 2022).

Table AQ-1 provides the estimated average daily construction emissions for the Project. The average daily construction period emissions (i.e., total construction period emissions divided by the number of construction days) were compared to the BAAQMD significance thresholds. Construction-related emissions would be below the BAAQMD significance thresholds. See Appendix A for air quality calculations.

Table AQ-1: Estimated Average Daily Construction Emissions (pounds)

Condition	ROG	NOx	PM ₁₀	PM _{2.5}	CO
Construction (2024)	2.35	19.20	1.22	1.13	15.90
Construction (2025)	0.95	7.90	0.29	0.27	9.22
Construction (2026)	3.37	3.62	0.13	0.12	4.48
Significance Threshold	54	54	82	54	---
Significant (Yes or No)?	No	No	No	No	No

Notes: PM₁₀ and PM_{2.5} are exhaust emissions only.
SOURCE: CAPCOA, 2022.

Uncontrolled construction activities could result in substantial short-term emissions of fugitive dust. According to BAAQMD’s *CEQA Air Quality Guidelines*, for a project to assure a less-than-significant impact related to construction-related fugitive dust emissions, it must implement all of BAAQMD’s basic BMPs for construction-related fugitive dust emissions.

Mitigation Measure AQ-1 would require the implementation of BAAQMD's basic BMPs for construction-related fugitive dust emissions during the Project. The **potentially significant** Project construction impacts (dust) would be reduced to a **less-than-significant** level with this mitigation.

Operational Impacts

The Project would not result in an increase in enrollment or staffing and would not increase vehicle trips. Furthermore, the new buildings would be subject to more stringent energy standards than the existing buildings. Therefore, the Project would not increase operational emissions and this impact would be **less than significant**.

Cumulative Impacts

The BAAQMD *CEQA Air Quality Guidelines* recommend that cumulative air quality effects from criteria air pollutants also be addressed by comparison to the mass daily and annual thresholds. These thresholds were developed to identify a cumulatively considerable contribution to a significant regional air quality impact. As shown in Table AQ-1, above, the Project-related construction emissions would be below the significance thresholds. BAAQMD's basic BMPs for construction-related fugitive dust emissions would be implemented through Mitigation Measure AQ-1 and the Project would not increase operational emissions. Therefore, the Project would not be cumulatively considerable and cumulative impacts would be **less than significant with mitigation incorporated**.

Conclusion

As shown, Project construction emissions would be **less than the BAAQMD significance thresholds** and BAAQMD's basic BMPs for construction-related fugitive dust emissions would be implemented through Mitigation Measure AQ-1 per BAAQMD's *CEQA Air Quality Guidelines*. The Project would not increase operational emissions. Therefore, criteria pollutant impacts would be **less than significant with mitigation incorporated**.

- c) The Project would constitute a new emission source of diesel particulate matter (DPM) from construction activities (on-road haul truck and off-road equipment exhaust emissions). Studies have demonstrated that DPM from diesel-fueled engines is a human carcinogen and that chronic (long-term) inhalation exposure to DPM poses a chronic health risk, particularly to sensitive receptors. Sensitive receptors include residences, hospitals, schools, day care facilities, and nursing homes. Construction activities could occur approximately 50 feet away from the nearest residence on Homestead Drive. However, most construction activities would occur at distances much greater than 50 feet. Furthermore, the Project site is situated within an operational school that would continue its regular activities during construction, with students and staff present. However, the Project is a short-term construction activity and exhaust PM₁₀ and PM_{2.5} emissions (see Table AQ-1) would each be less than three percent of BAAQMD's significance thresholds. Off-road construction equipment would be regulated per the State's In-Use Off-Road Diesel Vehicle Regulation

and on-road haul trucks would be regulated per the State's Truck and Bus Regulation. Therefore, health impacts would be **less than significant**.

- d) The BAAQMD's significance criteria for odors are subjective and are based on the number of odor complaints generated by a project. Generally, the BAAQMD considers any project with the potential to frequently expose members of the public to objectionable odors to cause a significant impact. With respect to the Project, diesel-fueled construction equipment exhaust would generate some odors. However, these emissions typically dissipate quickly and would be unlikely to affect a substantial number of people. The Project would not involve operational activities that generate odors. Therefore, odor impacts would be **less than significant**.

Mitigation Measures

Mitigation Measure AQ-1: The construction contractor shall implement the following during Project construction activities:

- 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 excavation, grading, and/or demolition 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 wood chips, mulch, or gravel.
- All vehicle speeds on unpaved roads shall be limited to 15 miles per hour.
- A publicly visible sign shall be posted with the telephone number and person to contact at the Lead Agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Air District's phone number shall also be visible to ensure compliance with applicable regulations.

IV. Biological Resources

Would the Project:

Environmental Issue	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) 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 the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?		X		
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies or regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?				X
c) Have a substantial adverse effect on federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?				X
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?				X
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?				X
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?				X

Background

The Project site is developed with school buildings, facilities, and landscaped areas. Trees surrounding the existing buildings may provide nesting and/or roosting habitat for a number of

special-status bird species. No potential jurisdictional wetlands or Waters of the United States occur on the Project site⁵.

Discussion

- a) Planned tree removal (23 trees and several areas of shrubs that may provide nesting habitat) and construction activities would have the potential to affect migratory and nesting protected bird species, either directly from tree removal, and/or from construction noise impacts on active nests in remaining trees on or near the site. This potentially significant impact would be reduced to a **less than significant** level by implementation of Mitigation Measure BIO-1, below.
- b) The Project would not affect any riparian habitat or sensitive natural communities, as none of those are present on the site. **No impact** would occur.
- c) The Project would not affect any wetlands habitats, as none of those are present on the site. **No impact** would occur.
- d) The Project has no potential to impede any migration corridors. The Project is not expected to “interfere substantially with the movement of any native resident or migratory fish or wildlife species” because there is minimal habitat on the site and the Project would not substantially change the uses of the project site and area. With respect to native wildlife nursery sites, see tree discussion, above. **No impact** would occur.
- e) According to the Project demolition plan, about 23 trees would be removed as a result of the project. The City of Mill Valley requires a permit to remove any Heritage tree, four or more (non-Heritage) trees over 19-inch circumference on a developed site per year, and removal of any tree from a vacant site without a permit. There are certain exceptions to the permit requirements based on tree size, emergencies and vegetative management. The Tamalpais Union High School District is not subject to the City of Mill Valley’s tree protection ordinance. In addition, none of the trees to be removed would qualify as a “Heritage Tree” under the City’s tree protection ordinance (Section 20.67 of the City’s Municipal Code) or would have a circumference of over 19-inches, so the project would conform with the City’s tree protection ordinance in any case. The Project landscaping plan includes planting of approximately 76 new trees, which would more than offset trees removed by the Project. Therefore, the Project’s impacts to trees would be **less than significant**.
- f) The Project site is not covered by any federal, state, or local conservation plan. Therefore, the Project would have **no impact** with respect to habitat conservation plan compliance.

⁵ <https://www.fws.gov/wetlands/data/mapper.html>

Mitigation Measures

Measure BIO-1: Prevent Loss of or Substantial Disturbance of Active Bird Nests. A pre-construction survey for nesting birds shall be conducted in trees to be removed and trees within 200 feet of construction activities by a qualified biologist within two weeks of construction activities, if construction activities are to occur within nesting/breeding season of native bird species (February- August). If active nests are identified within 300 feet of construction and would be exposed to either. Proposed tree removal or prolonged construction-related noise above normal levels, a buffer shall be implemented around nests during the breeding season, or until a biologist determines the young have fledged. The size of the buffer shall be determined by the project biologist, and would depend on multiple factors including relative change in noise and disturbance during construction activity, amount of vegetative screening between activity and nest, and sensitivity of species.

V. Cultural Resources

Would the project:

Environmental Issue	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?			X	
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?				X
c) Disturb any human remains, including those interred outside of dedicated cemeteries?		X		

Background

A Cultural Resources Evaluation was conducted for the site by Solano Archaeological Services (SAS 2024). On January 7, 2024, SAS archaeologist Karena Skinner conducted an intensive pedestrian survey of the Project area. With the exception of small landscaped and grass-covered spaces, the entire Project area was occupied by existing campus buildings and pavement. Consequently, any possible surface traces of archaeological remains could not be identified. However, given the recent nature of the landform on which the campus was built, it is unlikely any archaeological traces ever existed at this location.

Archival research and an intensive field survey did not identify any prehistoric or historic-period cultural resources within the Project area. Map and aerial photography reviews show that the land on which the Project area is situated is largely comprised of fill brought in sometime prior to the mid-1940s. Consequently, the Project area retains a very low level of sensitivity for containing prehistoric materials.

Concerning historic period resources, mapping, aerial photographs, and archival research indicates that the four buildings proposed for demolition date to the late 1940s and as such, as considered potential historical resources per CEQA. Prior to Project implementation, a qualified architectural historian must document and evaluate these buildings for their significance per CRHR criteria.

Discussion

- a) The Project would not have the potential to affect any off-site historic resources due to its location internal to the school campus. As discussed above, the existing buildings on the site were constructed in the 1940's. Consequently, they may qualify as historic resources historical resources as defined in CEQA Guidelines Section 15064.5. However, a review

of state, local, and federal registers indicates that the specific buildings proposed for removal do not have historical significance⁶. Therefore, the Project would have **no impact** on historical resources.

- b) The Project would involve grading for foundations and infrastructure. However, the site has been previously disturbed for construction of the existing school, and the fill materials underlying the site have a low probability of containing archaeological materials. SAS determined that the Project would have **a less than significant** to archaeological resources (SAS 2024).
- c) Although no prehistoric or historic-era human remains are known to exist on the Project site, it is possible that presently undocumented human interments may be uncovered during grading. Implementation of Mitigation Measure CULT-1 would reduce this **potentially significant impact** to a **less than significant** level.

Mitigation Measures

Mitigation Measure CULT-1: Human Remains. California law recognizes the need to protect interred human remains, particularly Native American burials and associated items of patrimony, from vandalism and inadvertent destruction. The procedures for the treatment of discovered human remains are contained in California Health and Safety Code Section 7050.5 and Section 7052 and California Public Resources Code Section 5097.

In accordance with the California Health and Safety Code, if human remains are uncovered during ground disturbing activities all such activities in the vicinity of the find shall be halted immediately and the District or the District's designated representative shall be notified. The District shall immediately notify the county coroner and a qualified professional archaeologist. The coroner is required to examine all discoveries of human remains within 48 hours of receiving notice of a discovery on private or state lands (Health and Safety Code Section 7050.5[b]). If the coroner determines that the remains are those of a Native American, he or she must contact the Native American Heritage Commission (NAHC) by phone within 24 hours of making that determination (Health and Safety Code Section 7050[c]). The responsibilities of the District for acting upon notification of a discovery of Native American human remains are identified in detail in the California Public Resources Code Section 5097.9. The District or their appointed representative and the professional archaeologist would consult with a Most Likely Descendent determined by the NAHC

⁶ https://en.wikipedia.org/wiki/National_Register_of_Historic_Places_listings_in_Marin_County,_California
https://ohp.parks.ca.gov/?page_id=21429

<https://nationalregisterofhistoricplaces.com/ca/marin/state.html>

<https://www.millvalleylibrary.org/763/Historic-Preservation> (Which references a 2017 Historic Context Statement/property list prepared by city consultant historians.)

<https://www.millvalleylibrary.org/DocumentCenter/View/1543/HRI---Property-List?bidId=>

Note that Wood Hall at Tam HS was listed as historic but is not proposed for demolition under the Project, which would demolish Woodruff Hall.

regarding the removal or preservation and avoidance of the remains and determine if additional burials could be present in the vicinity.

VI. Energy

Would the Project:

Environmental Issue	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?				X
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?				X

Setting

California Building Energy Efficiency Standards (Title 24, Part 6)

The energy consumption of new residential and nonresidential buildings in California is regulated by the state's Title 24, Part 6, Building Energy Efficiency Standards (California Energy Code). The California Energy Code was established by CEC in 1978 in response to a legislative mandate to create uniform building codes to reduce California's energy consumption and provide energy efficiency standards for residential and nonresidential buildings. CEC updates the California Energy Code every 3 years with more stringent design requirements for reduced energy consumption, which results in the generation of fewer GHG emissions.

The California Energy Commission (CEC) updates the Energy Code every three years. On August 11, 2021, the CEC adopted the 2022 Energy Code. In December, it was approved by the California Building Standards Commission for inclusion into the California Building Standards Code. The 2022 Energy Code encourages efficient electric heat pumps, contains prescriptive requirements for high-efficiency lighting, strengthens ventilation standards, and more. Buildings whose permit applications are applied for on or after January 1, 2023, must comply with the 2022 Energy Code.

California Green Building Standards Code (Title 24, Part 11)

The California Green Building Standards Code—Part 11, Title 24, California Code of Regulations — known as CALGreen, is the first-in-the-nation mandatory green building standards code developed to meet the state's GHG reduction goals. CALGreen includes regulations for energy efficiency, water efficiency and conservation, material conservation and resource efficiency, environmental quality, and more, and also includes mandatory provisions for commercial, residential, and public-school buildings. CalGreen includes a waste diversion mandate, which requires that at least 65 percent of construction materials generated during new construction or demolition projects are diverted from landfills.

Discussion

- a) The Project would require short-term energy consumption of petroleum fuels (primarily gasoline and diesel fuel) by construction workers traveling to and from the Project site, transportation of site and building materials, and equipment for on-site construction activities. Gasoline and diesel fuel would be the primary sources of energy for these activities except where electricity is available and feasible, thus electricity use during construction is considered to be minor.

Based on the CalEEMod modeling described in the air quality and GHG emissions sections of this Initial Study and standard fuel conversion factors, Project construction activities would require approximately 88,128 gallons of diesel fuel and approximately 6,362 gallons of gasoline⁷. This increase in gasoline and diesel fuel consumption would be temporary, of relatively short duration, and would cease once Project construction is completed. The Project would replace existing school buildings, which are outdated, have inadequate safety, and are substandard facilities. The Project would also modernize existing buildings and landscaping, incorporating modern design principles and technologies. Therefore, Project construction would not result in wasteful, inefficient, or unnecessary consumption of energy.

The Project would not result in wasteful, inefficient, or unnecessary consumption of energy during operation, given that the school facilities would be constructed to more stringent energy standards, in compliance with current State of California building energy efficiency standards and green building standards. Furthermore, the Project would not increase vehicle trips since there would be no change in student enrollment or staffing with the Project. Therefore, **no impact** would occur.

- b) The Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. The Project would comply with the current State of California Building Energy Efficiency Standards and the California Green Buildings Standards Code. Therefore, **no impact** would occur.

⁷ Fuel usage is estimated using the CalEEMod output for CO₂, and a kgCO₂/gallon conversion factor, as cited in the *U.S. Energy Information Administration Carbon Dioxide Emissions Coefficients*, https://www.eia.gov/environment/emissions/co2_vol_mass.php

VII. Geology and Soils

Would the Project:

Environmental Issue	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map, issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.				X
ii) Strong seismic ground shaking?		X		
iii) Seismic-related ground failure, including liquefaction?		X		
iv) Landslides?			X	
b) Result in substantial soil erosion or the loss of topsoil?			X	
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?		X		
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial director indirect risks to life or property?			X	
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of wastewater?				X
f) Directly or indirectly destroy a unique paleontological resource or site, or unique geologic feature?			X	

Background

Miller Pacific Engineering Group (MPEG) prepared a Geotechnical Investigation for the Project (MPEG 2023).⁸ The study included a literature review and exploratory soil borings. Relevant portions of the Geotechnical Investigation report are summarized below.

Soil and Geologic Conditions

The geotechnical exploration found different geologic and soil conditions within areas of proposed development.

The proposed Math, Science, and Art Building area is underlain by roughly 5 feet of fill composed of stiff, low plasticity sandy clay and dense silty and sandy gravel. The fill soils overlie 3- to 6-foot medium to very stiff, medium plasticity clay alluvium/colluvium. Weathered sandstone bedrock was encountered 8- to 14-feet below the ground surface. Groundwater was observed 4.5- and 9.0-feet below the ground surface.

The subsurface conditions in the proposed Auto Shop Building area vary across the planned footprint. The subsurface conditions consist of 3-feet of medium stiff to stiff, medium to high plasticity sandy and gravelly clay overlying weathered bedrock on the southern portion of the footprint. Roughly 3-feet of medium stiff, medium plasticity sandy clay fill overlying 20-feet of medium stiff to stiff, medium to high plasticity gravelly clay alluvium/colluvium was encountered in the northeastern corner. Groundwater was observed approximately 4.0 to 7.5-feet below the ground surface.

The subsurface conditions in the proposed music building area consist of completely to highly weathered sandstone bedrock immediately below the asphalt pavement section. Groundwater was observed 10-feet below the ground surface.

The subsurface conditions in the planned temporary classrooms area consist of approximately 8 to 10 feet of stiff, medium plasticity sandy clay and medium dense clayey sand fill overlying very soft to soft, high plasticity silty clay known as Bay Mud. The Bay Mud thickness in that area varies from roughly 10-feet on the southwestern corner to nearly 40-feet on the northeast corner. Weathered bedrock was encountered between 16- and 50-feet below the ground surface within the building footprint.

Groundwater was found at or near the ground surface and therefore MPEG anticipates the highest historic groundwater level at the project site to be at the ground surface in the lower lying areas of the campus (MPGE, 2023). Typically, groundwater levels fluctuate seasonally with higher levels expected during the wet winter months.

⁸ Miller Pacific Engineering Group, Geotechnical Investigation, TUHSD – Tamalpais High School – 700 Miller Avenue, Mill Valley, California, August 31, 2023.

Seismic Conditions

The Project site is located within a seismically active region that includes the Central and Northern Coast Mountain Ranges. Several active faults are present east and west of the site including the San Andreas, San Gregorio, and Hayward Faults. Conclusions from the most recent Uniform California Earthquake Rupture Forecast indicate the highest probability (33%) of an earthquake of 6.7 Richter Magnitude or greater on any of the active faults in the region by 2045 would be from the Hayward/Rodgers Creek Fault, located approximately 11.8 miles northeast of the Project site. The San Andreas Fault has a probability of 22% for a similar earthquake by 2045 (MPEG 2023) and is located approximately 5.9 miles southwest of the Project site.

Discussion

- a)
 - i. Under the Alquist-Priolo Earthquake Fault Zoning Act, the California Geological Survey produced 1:24,000 scale maps showing all known active faults and defining zones within which special fault studies are required. The Project site is not mapped as located within an Alquist-Priolo Earthquake Fault Zone. In addition, MPEG did not observe evidence during site reconnaissance indicative of active or historic faulting. MPEG concluded that the potential for fault surface rupture on the campus is very low (MPEG 2023).
 - ii. As discussed in the Background, above, Mill Valley is subject to ground shaking caused by a number of regional faults, most prominently the San Andreas Fault and Hayward/Rodgers Creek Fault. Because ground rupture is unlikely on the site, ground shaking would be the cause of most damage during an earthquake. According to the Association of Bay Area Government's Seismic Hazard maps, the Project area is subject to severe seismic shaking in the event of a major earthquake on the faults in the region⁹.

The proposed school buildings would be designed to current seismic safety codes, and the design would be reviewed for structural safety by the State Architect. Given updates to the Building Code, the new buildings would likely be safer seismically than the existing buildings. Large earthquakes could generate strong to violent ground shaking at the Project site and could cause damage to buildings and infrastructure and threaten public safety. This is a **potentially significant** impact that would be reduced to a **less than significant** level with implementation of the recommendations contained in the MPEG geotechnical report, per Mitigation Measure GEO-1, below.

- iii. Seismic ground shaking can induce settlement of unsaturated, loose, granular soils. Settlement occurs as the loose soil particles rearrange into a denser configuration when subjected to seismic ground shaking. Varying degrees of settlement can occur throughout a deposit, resulting in differential settlement of structures founded on such deposits. MPEG did not observe loose granular deposits above the highest historic groundwater level. MPEG concluded that the risk of seismically induced ground settlement occurring

⁹ <https://mtc.maps.arcgis.com/apps/webappviewer/index.html?id=4a6f3f1259df42eab29b35dfcd086fc8>

under the proposed structures is low (MPEG 2023). Therefore, this impact would be **less than significant**.

MPEG evaluated the potential for liquefaction based on testing of site soils and concluded that the potential for substantive liquefaction on-site is medium to high. Therefore, this impact is **potentially significant** but would be reduced to **less than significant** with implementation of Mitigation Measure GEO-1 below (MPEG 2023).

Lurching and associated ground cracking can occur during strong ground shaking. The ground cracking generally occurs along the tops of slopes where stiff soils are underlain by soft deposits, or along steep slopes or channel banks. These conditions generally do not exist at the site, so MPEG concluded that the risk of lurching or ground cracking impacting the structures is very low (MPEG 2023). Therefore, this impact would be **less than significant**.

iv. Slope instability generally occurs on relatively steep slopes and/or on slopes underlain by weak materials. The Project site is located on terrain that rises to the west with gentle slopes and retaining walls separating areas of elevation change. Therefore, traditional (hillside) slope instability is not considered a hazard and the impact would be **less than significant**.

- b) Sandy soils on moderate slopes or clayey soils on steep slopes are susceptible to erosion when exposed to concentrated water runoff. The Tamalpais High School campus is covered in hardscaped surfaces, existing structures, and vegetation. The temporary classrooms would be built on the eastern area of the campus, an area that is flat. The proposed building demolition and replacement would occur on the southwestern area of the campus, which is characterized by sloped terrain that rises to the west. Additionally, during subsurface exploration MPEG observed material susceptible to erosion near the ground surface, and concluded the risk of erosion due to surface water runoff is moderate. The risk of erosion would increase during construction when the surficial soils are exposed. The Project would disturb more than one acre of soil and would require a Construction General Permit (CGP) issued by the State Water Resources Control Board. A Stormwater Pollution Prevention Plan (SWPPP) would be required to be prepared prior to issuance of the permit.

Furthermore, California Government Code Section 53097 stipulates that the District must comply with a city or county ordinance (1) regulating drainage improvements and conditions, (2) regulating road improvements and conditions, or (3) requiring the review and approval of grading plans. The City of Mill Valley Urban Runoff Pollution Prevention Ordinance includes both construction and operational Best Management Practices (BMPs) to reduce stormwater runoff contaminants in drainage and thus the Project is required to comply.

The ordinance requires each construction project to have an erosion and sediment control plan (ESCP) which addresses erosion and sediment control and pollution prevention during the construction phase as well as final stabilization control measures. The Project also would be required to develop and implement an Erosion and Sediment Control Plan (ESCP) or have the SWPPP meet the requirements of the ESCP. The ESCP and the specific control measures to be utilized are subject to the review and approval of the City of Larkspur. Modifications of an approved ESCP are required if, during the course of construction at a site, unanticipated conditions occur, or if the plans prove inadequate for the intended purpose. The SWPPP and compliance with ESCP requirements would reduce the potential impact of erosion to **less than significant**.

- c) For discussion of liquefaction, lateral spreading, collapse, and landslides see items a(iii) and a(iv) above.

Some areas of the site in question have underlying soft and compressible Bay Mud, with up to 40 feet of thickness. MPEG conducted subsurface exploration and consolidation tests to estimate the Bay Mud deposit thicknesses and understand its consolidation properties. Settlement analyses indicate that the Bay Mud found in the lower elevations of the Project site in the proposed temporary classroom construction area has not fully consolidated due to 1950s fill placement in proposed improvement areas. The impact of differential settlement is **potentially significant** but would be reduced to a **less than significant** level with implementation of Mitigation Measure GEO-1.

- d) Expansive soils will shrink and swell with fluctuations in moisture content and are capable of exerting significant expansion pressures on building foundations, interior floor slabs, and exterior flatwork. Distress from expansive soil movement can include cracking of brittle wall coverings (stucco, plaster, drywall, etc.), cracked door and/or window frames, and uneven floors and cracked slabs. Flatwork, pavements, and concrete slabs-on-grade are particularly vulnerable to distress. Based on subsurface exploration and laboratory testing, MPEG concluded that the risk of expansive soil affecting the Project is low (MPEG 2023). Therefore, this impact would be **less than significant**.
- e) The Project would be served by the public sewer system and would not include any septic systems. Therefore, **no impact** would occur with respect to adequacy of site soils for septic systems.
- f) The Project would involve limited grading to a previously developed site. Therefore, potential impacts to paleontological resources would be considered **less than significant**.

Mitigation Measures

Mitigation Measure GEO-1. The Project shall implement all site preparation, structural, drainage, and foundation design recommendations included in the MPEG Geotechnical Investigation (MPEG 2023). With respect to potential seismically induced slope failures, a

professional engineer shall create a finalized grading plan and assess the potential for bearing failure based on planned fill and structural loads. Limitations on the thickness of new fills may be required to maintain adequate factors of safety against instability.

VIII. Greenhouse Gas

Would the Project:

Environmental Issue	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			X	
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?			X	

Background

This section describes greenhouse gas (GHG) emissions impacts associated with the Project and is consistent with the methods described in the BAAQMD *CEQA Air Quality Guidelines* (April 2023). The BAAQMD adopted GHG significance thresholds in April 2022, however, they do not apply to construction activities (BAAQMD, 2022).

“Global warming” and “global climate change” are the terms used to describe the increase in the average temperature of the earth’s near-surface air and oceans since the mid-20th century and its projected continuation. Warming of the climate system is now considered to be unequivocal, with global surface temperature increasing approximately 1.33 degrees Fahrenheit (°F) over the last 100 years. Continued warming is projected to increase global average temperature between 2 and 11°F over the next 100 years.

Gases that trap heat in the atmosphere are referred to as GHG because they capture heat radiated from the sun as it is reflected back into the atmosphere, much like a greenhouse does. The accumulation of GHG has been implicated as the driving force for global climate change. The primary GHG are carbon dioxide (CO₂), methane (CH₄), and nitrous oxide (N₂O), ozone, and water vapor.

While the presence of the primary GHG in the atmosphere are naturally occurring, CO₂, CH₄, and N₂O are also emitted from human activities, accelerating the rate at which these compounds occur within earth’s atmosphere. Emissions of CO₂ are largely by-products of fossil fuel combustion, whereas methane results from off-gassing associated with agricultural practices, coal mines, and landfills. Other GHG include hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride, and are generated in certain industrial processes.

CO₂ is the reference gas for climate change because it is the predominant GHG emitted. The effect that each of the aforementioned gases can have on global warming is a combination of the mass of their emissions and their global warming potential (GWP). GWP indicates, on a pound-

for-pound basis, how much a gas is predicted to contribute to global warming relative to how much warming would be predicted to be caused by the same mass of CO₂. CH₄ and N₂O are substantially more potent GHG than CO₂, with GWP of 28 and 265 times that of CO₂, respectively.

In emissions inventories, GHG emissions are typically reported in terms of pounds or metric tons of CO₂ equivalents (CO₂e). CO₂e are calculated as the product of the mass emitted of a given GHG and its specific GWP. While CH₄ and N₂O have much higher GWP than CO₂, CO₂ is emitted in such vastly higher quantities that it accounts for the majority of GHG emissions in CO₂e.

Discussion

- a) The Project's estimated 30-year amortized annual construction related GHG emissions would be approximately 31.7 metric tons of CO₂e. There is no BAAQMD CEQA significance threshold for construction related GHG emissions. BAAQMD states that GHG emissions from construction represent a very small portion of a project's lifetime GHG emissions. GHG emissions from construction are a one-time release and would not pose a significant impact to the environment (BAAQMD 2022).

Project operational GHG emissions were not quantified because the Project would not increase GHG emissions. The Project would not result in an increase in enrollment or staffing and would not result in an increase in vehicle trips. Furthermore, the new buildings would be subject to more stringent energy standards than the existing buildings. Therefore, this impact would be **less than significant**.

- b) The principal State plans and policies adopted for the purpose of reducing GHG emissions are Senate Bill 32 (SB 32) and the 2022 CARB Scoping Plan (Scoping Plan). The Scoping Plan lays out a path to achieve targets for carbon neutrality and reduce anthropogenic GHG emissions by 85 percent below 1990 levels no later than 2045, as directed by Assembly Bill 1279. SB 32 was preceded by Assembly Bill 32 (AB 32). AB 32 required that statewide GHG emissions be reduced to 1990 levels by 2020. SB 32 requires that by 2030 statewide emissions be reduced by 40 percent beyond the 2020 reduction target set by AB 32. The State has taken these measures because no project individually could have a major impact (either positively or negatively) on the global concentration of GHG. Therefore, the Project would result in a significant impact if it would be in conflict with state regulations for reducing GHG emissions such as SB 32 or the Scoping Plan.

Increasing building energy efficiency is a measure identified under the Scoping Plan to reduce statewide GHG emissions. As outlined in the Scoping Plan, energy efficiency moderates the need for electricity consumption and contributes to overall environmental sustainability. By replacing older buildings with buildings built to modern, more stringent energy standards, the Project aligns with the Scoping Plan's overarching goal of achieving substantial and meaningful reductions in GHG emissions statewide. Thus, the Project would be consistent with State GHG plans and policies and this impact would be **less than significant**.

The City of Mill Valley adopted a Climate Action Plan (CAP) in 2013 and is currently in the process of updating it. Strategy SA-C1 applies to the Project. Strategy SA-C1 supports improving air quality through the planting of trees and the creation of green space. The Project would remove twenty-three existing trees and 76 new trees would be planted. Therefore, the Project would be consistent with the City of Mill Valley CAP and the impact would be **less than significant**.

Conclusion

The Project would be consistent with the GHG emissions reduction measures in the City of Mill Valley CAP. The Project would be consistent with the climate change policies and measures in CARB's scoping plans and would not conflict with State GHG reduction goals. Therefore, Project impacts would be **less than significant**.

IX. Hazards and Hazardous Materials

Would the Project:

Environmental Issue	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?			X	
b) 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?			X	
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?		X		
d) 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 it create a significant hazard to the public or the environment?				X
e) 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, would the Project result in a safety hazard or excessive noise for people residing or working in the Project area?				X
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?				X
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?			X	

Discussion

- a, b) Project construction activities may involve the use and transport of hazardous materials. These materials may include fuels, oils, mechanical fluids, and other chemicals used during construction. Transportation, storage, use, and disposal of hazardous materials during construction activities would be required to comply with applicable federal, state, and local statutes and regulations. Compliance would ensure that human health and the

environment are not exposed to hazardous materials. In addition, the construction contractor would be required to implement a Stormwater Pollution Prevention Plan during construction activities to prevent contaminated runoff from leaving the Project site. Therefore, the impacts would be **less than significant**.

Project operations (school uses) would not involve the routine transport, use, or disposal of hazardous materials. However, the use of the proposed auto shop building in the southwest corner of the campus may involve small amounts of lubricants and fuels. 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. Therefore, the Project would not create a significant hazard to the public or the environment from such activities and the impact would be **less than significant**.

- c) As discussed in a) above, Project operations would not involve the use of hazardous materials on campus, and construction use of such materials would be carefully implemented in compliance with all applicable regulations. The construction and demolition sites would be fenced and no student access would be permitted. Therefore, this impact would be **less than significant**.

NorBay Consulting conducted an evaluation of asbestos and lead-based paints that may be associated with the existing buildings to be demolished on the campus (NorBay 2023). Samples of building materials at all of the buildings proposed for demolition were collected and analyzed by Norbay. The following materials at the school were identified to contain asbestos minerals or known to contain asbestos:

- Drywall/taping mud throughout the lower-level storage areas and shoes at Woodruff Hall,
- Previous inspections indicate that the thermal insulation system insulation and mudded joints at Greenwood Hall contain asbestos; Norbay Consulting could not their presence,
- Exterior black waterproofing sealant on the west side of the storage building formerly used as a bus barn,
- Sheet vinyl flooring in the restroom of Benefield Hall,
- Drywall/taping mud through the basement level of Benefield Hall,
- Caulking/sealant between exterior windows and walls of Benefield Hall, and;
- Exterior Window Caulking at Benefield Hall.

NorBay collected readings of interior/exterior painted/coated surfaces at numerous locations in the buildings to be demolished. Lead-based paint/glazing was found in the following buildings:

Woodruff Hall

Greenwood Hall

Storage building formerly used as a bus barn

Benefield Hall

Demolition could disturb and disperse lead found within the lead-based paint/glazing and create a hazard to the public. This is a **potentially significant** impact that would be reduced to a **less than significant** level with implementation of Mitigation Measure HAZ-1, below.

- d) A review of the Envirostor database (Cortese List) indicated that there are no known hazardous waste sites within 1000 feet of the school¹⁰. Therefore, the Project would not present a hazard to the public or the environment and **no impact** would occur.
- e) The Project site is not within two miles of an airport or within an airport land use plan area. Therefore, it would not present a hazard to air safety, and **no impact** would occur.
- f) Construction and operation of the Project are not expected to interfere with City of Mill Valley's emergency response because it is the replacement of existing school buildings on an existing school campus. Construction, including staging, would be limited to the existing high school, and traffic would not be substantially affected by the Project. In addition, the Office of State Architect would review all plans for emergency response accessibility and safety. **No impact** would occur.
- g) The Project site is situated in a developed urban area, surrounded by other urban uses. It is not designated as a fire hazard severity zone of moderate or higher¹¹. Additionally, the new and reconstructed school buildings would include fire protection infrastructure (alarms, sprinklers, etc.) as required by current codes. Therefore, the Project would have a **less than significant** impact with respect to wildfire hazards.

Mitigation Measures

Mitigation Measure HAZ-1: As part of the project, all items potentially containing asbestos materials or lead-based paints shall be removed intact to prevent the generation of any asbestos or lead-based paint hazard to the public.

¹⁰<https://www.envirostor.dtsc.ca.gov/public/map/?myaddress=Tamalpais+High+School>

¹¹<https://gisopendata.marincounty.org/datasets/MarinCounty::fire-hazard-severity-zone-1/explore?location=37.864395%2C-122.502329%2C16.00>

X. Hydrology and Water Quality

Would the Project:

Environmental Issue	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?			X	
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?				X
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would: <ul style="list-style-type: none"> i) result in substantial erosion or siltation on- or off-site; ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on-or off-site; iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or iv) impede or redirect flood flows? 			X	
d) In flood hazard, tsunamis, or seiche zones, risk release of pollutants due to project inundation?			X	
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?				X

Discussion

- a, c) During construction activities, there would be a potential for surface water to carry sediment from bared soils and small quantities of other pollutants into the City's stormwater system, which ultimately discharges to San Francisco Bay, potentially contributing to degrading water quality in the drainages and Bay In addition, potential pollutants such as gasoline, diesel fuel, lubricating oil, hydraulic oil, lubricating grease, automatic transmission fluid, paints, solvents,

glues, and other substances may be used/released by construction equipment. An accidental release of any of these substances could degrade the water quality of the surface water runoff and add additional sources of pollution into the drainage system.

The City of Mill Valley is a member agency of the Marin Countywide Stormwater Pollution Prevention Program (MCSTOPPP)MCSTOPPP, under which is is required to implement a local stormwater pollution prevention program.

The Federal Clean Water Act and the California Porter-Cologne Water Quality Control Act require a National Pollutant Discharge Elimination System (NPDES) permit to prevent harmful pollutants from being dumped or washed by stormwater runoff, into the stormwater system, then discharged into local waterbodies. Smaller (less than 100,000 population) municipalities and unincorporated counties are required to obtain coverage under a statewide NPDES Municipal General Stormwater Permit (Phase II Permit) issued by the State Water Resources Control Board. In Marin, the County and all Marin's municipalities are subject to the conditions of the regulations described in the Phase II Small Municipal Separate Storm Sewer System (MS4) NPDES Permit, Water Quality Order No. 2013-0001-DWQ, General Permit No. CAS000004.

The City of Mill Valley administers its Urban Runoff Pollution Prevention Ordinance, the purpose of which is to manage and control stormwater and non-stormwater discharges in a manner pursuant to and consistent with the Phase II Permit.

California Government Code Section 53097 stipulates that school districts must comply with a city or county ordinance (1) regulating drainage improvements and conditions, (2) regulating road improvements and conditions, or (3) requiring the review and approval of grading plans. The City of Mill Valley Urban Runoff Pollution Prevention Ordinance includes both construction and operational Best Management Practices (BMPs) to reduce stormwater runoff contaminants in drainage and thus the Project is required to comply.

The ordinance requires each construction project to have an erosion and sediment control plan (ESCP) which addresses erosion and sediment control and pollution prevention during the construction phase as well as final stabilization control measures. The ESCP and the specific control measures to be utilized are subject to the review and approval of the City of Larkspur.

The Project would disturb more than one acre and therefore would require a Construction General Permit (CGP) from the State Water Resources Control Board. A Stormwater Pollution Prevention Plan (SWPPP) would be required to be prepared prior to issuance of the permit. Under the City of Larkspur Urban Runoff Pollution Prevention Ordinance a SWPPP may be submitted in lieu of the ESCP provided it meets the requirements of the ESCP. The ESCP/SWPPP is required to identify a practical sequence for BMP implementation and maintenance, site restoration, contingency measures, responsible parties, and agency contacts.

The SWPPP must include but not be limited to the following elements:

- Temporary erosion control measures would be employed for disturbed areas.
- No disturbed surfaces would be left without erosion control measures in place during the winter and spring months. Cover disturbed areas with soil stabilizers, mulch, fiber rolls, or temporary vegetation.
- Sediment would be retained on site by a system of sediment basins, traps, or other appropriate measures. Drop inlets shall be lined with filterfabric/geotextile.
- The construction contractor would prepare Standard Operating Procedures for the handling of hazardous materials on the construction site to eliminate or reduce discharge of materials to storm drains. This may include locating construction-related equipment and processes that contain or generate pollutants in a secure area, away from storm drains and gutters, and wetlands; parking, fueling, and cleaning all vehicles and equipment in the secure area; designating concrete washout areas; and preventing or containing potential leakage or spilling from sanitary facilities.
- BMP performance and effectiveness would be determined either by visual means where applicable (e.g., observation of above-normal sediment release), or by actual water sampling in cases where verification of contaminant reduction or elimination (such as inadvertent petroleum release) is required by the RWQCB to determine adequacy of the measure.
- In the event of significant construction delays or delays in final landscape installation, native grasses or other appropriate vegetative cover would be established on the construction site as soon as possible after disturbance, as an interim erosion-control measure throughout the wet season.

Implementation of the ESCP (or SWPPP) would ensure that the construction of the Project would not violate any water quality standards or waste discharge.

- b) The City of Mill Valley purchases all of its water from the Marin Municipal Water District (MMWD). About 75% of the MMWD's water supply originates from rainfall on the Mt. Tamalpais watershed and in the hills of west Marin, flowing into the MMWD's seven reservoirs. The MMWD also supplements its supply with water from the Sonoma County Water Agency (SCWA), which comes from the Russian River system in Sonoma County. The Russian River water supply originates from rainfall runoff to the River and then captured in Lake Sonoma and Lake Mendocino. MMWD does not rely substantially on groundwater. As such, it would not conflict with any groundwater management plan, and **no impact** would result.
- c) The Project area is already developed with school facilities and landscaped areas. However, the Project would increase impervious surfaces with new asphalt and concrete paved surfaces. The site currently has about 69,700 sq. ft. of impervious surfaces and 15,300 sq. ft. of pervious surfaces. The Project would decrease impervious surfaces to about 67,300

sq. ft, and increase pervious surfaces to about 17,700 sq. ft. The decrease in impervious surfaces would result in a slight reduction in peak runoff from the site. Therefore, the Project would have **no impacts** impacts to peak runoff.

The Project would create or replace greater than 5,000 square feet of impervious area and would therefore be required to prepare and maintain Low-Impact Development Plans with post-construction BMPs for the Project. The District would be responsible for costs incurred in operating, maintaining, repairing, and replacing any stormwater quality improvements and features. The District is required to conduct inspection and maintenance activities and complete annual reports. Implementation of the requirements described above would reduce water quality impacts to a **less-than-significant** level.

- d) Tamalpais High School is located on sloped terrain that rises to the west. The proposed building demolition and replacement would occur on the southwest area of the campus, an area of higher elevation that is not within a FEMA flood zone. The lower elevation areas of the campus including the area for the proposed temporary classrooms are mapped as within a FEMA 500-year flood or 100-year flood zone (ABAG, 2023, in MPEG 2023¹²). Therefore, widespread flooding may be considered a significant geologic hazard at that area of Project site. The existing buildings on the eastern area of the school and the tennis courts are currently subject to flood hazard. To remain in compliance with the 2022 California Building Code, Project floor elevations have been designed to remain one foot above the FEMA base flood elevation in accordance with accepted hydrologic and hydraulic engineering techniques. Therefore, this impact would be **less than significant**.

The Project site is not mapped within a zone at risk of flooding due to the failure of local dams (Department of Water Resources, 2023, in MPEG 2023). Therefore, the risk of inundation of the site from dam failure would be low. **No impact** would occur.

Seiche and tsunamis are short duration, earthquake-generated water waves in large, enclosed bodies of water and the open ocean, respectively. The extent and severity of a seiche or tsunami would be dependent upon ground motions and fault offset from nearby active faults. The Project site is adjacent to Richardson Bay and the lower elevation levels of the campus including the location of the proposed temporary classrooms are located within a mapped Tsunami Inundation Zone (ABAG, 2023, in MPEG 2023). There have been eight credible local seiche events observed in San Francisco Bay between 1854 and 1906, six of which are attributed to earthquake activity and two to landslides.

No confirmed seiche has been recorded in San Francisco Bay since 1906. Considering the recorded history of seiche in San Francisco Bay, MPEG concluded that the risk of seiche or tsunami in excess of the height observed in the 1964 tsunami (approximately 3.5-feet) is low. Furthermore, the buildings proposed for the southwest area of the campus would be in an area of higher elevation and are not located within a mapped Tsunami

¹² Miller Pacific Engineering Group, Geotechnical Investigation, TUHSD – Tamalpais High School – 700 Miller Avenue, Mill Valley, California, August 31, 2023.

Inundation Zone. Project floor elevations, including floor elevations of the proposed temporary classrooms, have been designed to remain one foot above the FEMA base flood elevation. Therefore, the Project impact to future occupants of the Project from these hazards would be **less than significant**. Mudflows and other slope instability impacts are addressed in the Geology section of this document.

- e) Please see Item b), above. The project would not affect groundwater resources, and **no impact** would occur.

XI. Land Use and Planning

Would the Project:

Environmental Issue	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Physically divide an established community?				X
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the Project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?				X
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?				X

Discussion

- a) The new school buildings are proposed on an existing school campus containing similar existing facilities. Because the Project would not change the existing land use but would instead upgrade the existing school facilities on-site, the Project would not create conflicts between uses or divide an established community, and there would be **no impact**.
- b) The Project parcel's general plan land use designation and zoning are both C-F (Community Facilities), where a school is an allowed use. The Project would not change the existing land use on site and would therefore have **no impact** on plan conformance.
- c) The Project site is not located within the boundaries of a habitat conservation plan or a natural community conservation plan; therefore, the Project would not conflict with any habitat plans and there would be **no impact**.

XII. Mineral Resources

Would the Project:

Environmental Issue	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?				X
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?				X

Discussion

- a, b) The Project site is a developed school campus in an urban area and is not identified in the City of Mill Valley's 2040 General Plan as a site containing mineral resources that would be of local, regional, or statewide importance. The Project site does not contain any known mineral deposits or active mineral extraction operations. Therefore, the Project would have no impact on mineral resources.

XIII. Noise

Would the Project result in:

Environmental Issue	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Generation of a substantial temporary or permanent increase in ambient noise levels in vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?		X		
b) Generation of excessive groundborne vibration or groundborne noise levels?			X	
c) For a Project within the vicinity of a private airstrip or 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, would the Project expose people residing or working in the project area to excessive noise levels?				X

Background

RCH Group, Inc. (RCH) performed noise monitoring at the Project site on November 30, 2023. The following analysis details the results of the noise monitoring and potential noise impacts from the Project.

Noise Descriptors

Noise can be defined as unwanted sound. It is commonly measured with an instrument called a sound level meter. The sound level meter captures the sound with a microphone and converts it into a number called a decibel. To correlate the microphone signal to a level that corresponds to the way humans perceive noise, the A-weighting filter is used. A-weighting de-emphasizes low-frequency and very high-frequency sound in a manner similar to how humans hear sound. The abbreviation dBA is sometimes used when the A-weighted sound level is reported.

Different time-averaged scales are used to represent noise environments and consequences of human activities. The most commonly used noise descriptors are: the A-weighted sound level over a given time period (Leq)¹³; average day–night 24-hour average sound level (Ldn)¹⁴ with a nighttime increase of 10 dB to account for sensitivity to noise during the nighttime; and community

¹³The Equivalent Sound Level (Leq) is a single value of a constant sound level for the same measurement period duration, which has sound energy equal to the time-varying sound energy in the measurement period.

¹⁴Ldn is the day–night average sound level that is equal to the 24-hour A-weighted equivalent sound level with a 10-decibel penalty applied to night between 10:00 p.m. and 7:00 a.m.

noise equivalent level (CNEL)¹⁵, , which also is a 24-hour average that includes both an evening and a nighttime sensitivity weighting.

Table NOISE-1 identifies decibel levels for common sounds heard in the environment. With regard to increases in A-weighted noise level, the following relationships occur (Caltrans, 1998a):

- Under controlled conditions in an acoustics laboratory, the trained healthy human ear is able to discern changes in sound levels of 1 dB;
- Outside of such controlled conditions, the trained ear can detect changes of 2 dB in normal environmental noise;
- It is widely accepted that the average healthy ear, however, can barely perceive noise levels changes of 3 dB;
- A change in level of 5 dB is a readily perceptible increase in noise level; and
- A 10-dB change is recognized as twice as loud as the original source, although different people may perceive sound increases of from 6-10 dB as twice as loud.

Table NOISE-1. Typical Noise Levels

Noise Level (dB)	Outdoor Activity	Indoor Activity
90+	Gas lawn mower at 3 feet, jet flyover at 1,000 feet	Rock Band
80-90	Diesel truck at 50 feet	Loud television at 3 feet
70-80	Gas lawn mower at 100 feet, noisy urban area	Garbage disposal at 3 feet, vacuum cleaner at 10 feet
60-70	Commercial area	
40-60	Quiet urban daytime, traffic at 300 feet	Large business office, dishwasher next room
20-40	Quiet rural, suburban nighttime	Concert hall (background), library, bedroom at night
10-20		Broadcast / recording studio
0	Lowest threshold of human hearing	Lowest threshold of human hearing

SOURCE: Modified from Caltrans Technical Noise Supplement, 1998

Noise Attenuation

Stationary point sources of noise, including construction equipment, attenuate (lessen) at a rate of 6 to 7.5 dB per doubling of distance from the source, depending on ground absorption. Soft sites, such as soft dirt, grass, or unpaved sites with scattered bushes and trees, attenuate at 7.5 dB per doubling. Hard sites have reflective surfaces (e.g., parking lots or smooth bodies of water) and therefore have less attenuation (6.0 dB per doubling). A street or roadway with moving vehicles (known as a “line” source), would typically attenuate at a lower rate, approximately 3 to 4.5 dB each time the distance doubles from the source (Caltrans, 1998b). Physical barriers

¹⁵CNEL is the average A-weighted noise level during a 24-hour day, obtained by addition of 5 decibels in the evening from 7:00 to 10:00 p.m., and an addition of a 10–decibel penalty in the night between 10:00 p.m. and 7:00 a.m.

located between a noise source and the noise receptor, such as buildings, berms, or sound walls, would increase the attenuation. Noise from large construction sites would have characteristics of both “point” and “line” sources, so attenuation would likely range between 4.5 and 7.5 dB per doubling of distance.

City of Mill Valley General Plan

Chapter 8 (Noise) of the Mill Valley General Plan contains policies and programs to prevent problems created by excessive noise levels and to maintain or reduce current noise levels in the community. The following are relevant to the Project:

Policy N.3-2: Ensure that all acoustical analyses required by the City:

- Are prepared by a qualified person or firm experienced in the fields of environmental noise assessment and architectural acoustics as selected or pre-approved by the City.
- Include representative noise level measurements with sufficient sampling periods and locations to adequately describe local conditions.
- Estimate existing and projected (20-year) noise levels in terms of Ldn and/or the standards of the noise ordinance and compare those levels to the policies of this Noise Element.
- Recommend appropriate mitigation to achieve compliance with the adopted policies and standards of this Noise Element. Where the noise source in question consists of intermittent single events, the report shall address the effects of maximum noise levels in sleeping rooms in terms of possible sleep disturbance.
- Describe a post-project assessment program that could be used to evaluate the effectiveness of the proposed mitigation measures.

Goal N.3: Construction Noise: Manage noise from construction.

Policy N4.1: Implement appropriate standard noise controls for all construction projects.

Policy N4.2: Require detailed construction noise management plans.

Policy N4.3: Develop a guidance manual to provide information to the public regarding construction noise control.

City of Mill Valley Municipal Code

Chapter 7.16 (Noise Control) of the City of Mill Valley Municipal Code prohibits unnecessary, excessive, and annoying noises from all sources of noise in the City of Mill Valley. The following are relevant to the Project:

Per §7.16.080(C), noise sources associated with or vibration created by construction, repair, remodeling, or grading of any real property or during authorized seismic surveys are exempt from the provisions of Chapter 7.16, provided such activities do not take place between the hours of 6:00 p.m. and 7:00 a.m. on weekdays, or at any time on Saturday, Sunday or a legal holiday and

provided any vibration created does not endanger the public health, welfare and safety. Heavy equipment and power tools are restricted to weekdays between the hours of 8:00 a.m. and 6:00 p.m. Owner/occupant builders are exempt from the time and heavy equipment and power tools restrictions on Saturdays between the hours of 9:00 a.m. and 5:00 p.m.

Vibration

Vibration is an oscillatory motion which can be described in terms of displacement, velocity, or acceleration. The peak particle velocity (PPV) is the descriptor used in monitoring of construction vibration.

Sensitive Receptors

The site is surrounded by single-family residential uses to the south and west, commercial and residential uses to the north, and other school uses to the east. The overall school campus is in a single-family residential neighborhood in south Mill Valley. Noise-sensitive receptors in the City of Mill Valley General Plan are identified as residences, hospitals, schools, nursing homes, theaters, auditoriums, churches, meeting halls, libraries, schools, museums, and parks.

Existing Noise Environment

To quantify existing ambient noise levels, this noise monitoring consisted of four short-term (10-minute) noise measurements in and around the Project site. Table NOISE-2 summarizes the locations and results of the noise measurements. Figure 7 shows the locations of the noise measurements on a map. Based on observations during the short-term measurements, the main sources of noise in and around the Project site include traffic noise on Miller Avenue, Almonte Drive, and Homestead Boulevard. Other noise sources include noise from the school parking lot and students.

Table NOISE-2. Existing Noise Levels

Location	Time Period	Noise Levels (dB)	Noise Sources
Site 1: Lawn adjacent to guest parking lot area, north of Wood Hall.	Thursday November 30, 2023 10:23 a.m. to 10:33 a.m.	5-minute Leq's: 68, 60	Traffic noise from Miller Avenue 70-86 dB.
Site 2: Northeast parking lot, south of Miller Avenue, north of aquatics facility.	Thursday November 30, 2023 10:36 a.m. to 10:46 a.m.	5-minute Leq's: 51, 52	Parking lot noise 50-62 dB. Traffic noise from Miller Avenue 55-60 dB.
Site 3: South of Tamalpais High School, at the intersection of Almonte Boulevard and Stadium Avenue, directly north of apartment building.	Thursday November 30, 2023 10:57 a.m. to 11:07 a.m..	5-minute Leq's: 50, 60	Traffic noise from Almonte Drive was 58-71 dB. Distant noise from students playing basketball on-campus was 48-51 dB.
Site 3: West of Tamalpais High School,	Thursday November 30, 2023	5-minute Leq's: 52, 52	Nearby construction occurring at home on

at the intersection of Almonte Boulevard and Gomez Way, nearby residences	11:17 a.m. to 11:27 a.m.		Homestead Boulevard was 60-74 dB. Traffic on Homestead Boulevard was 52-66 dB.
Source: RCH Group, 2023			

Figure 7 Noise Measurement Locations



Discussion

a) **Construction Noise Impacts.**

Project construction would consist of 3 phases and is anticipated to begin 2024 and run through August 2026. Construction would result in a temporary increase in ambient noise levels in the vicinity of the Project. Noise levels generated by construction equipment would 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.

Construction activities could occur approximately 50 feet away from the nearest residence on Homestead Drive. However, most construction activities would occur at distances much greater than 50 feet. The maximum noise levels at 50 feet for various types of construction equipment that could be used during construction are provided in Table NOISE-3.

Table NOISE-3. Typical Noise Levels from Construction Equipment (L_{max})

Construction Equipment	Noise Level (dB, L _{max} at 50 feet)
Dump Truck	76
Air Compressor	78
Backhoe	78
Dozer	82
Excavator	81
Flat Bed Truck	74
Grader	85
Generator	81
Roller	80
Vibratory Concrete Mixer	80
Concrete Mixer Truck	79
Front End Loader	79

Notes:

L_{max} = maximum sound level

SOURCE: Federal Highway Administration (FHWA) Roadway Construction Noise Model User's Guide, 2006.

Construction equipment would not all operate at the same time or location. As shown in Table NOISE-3, construction noise levels at the nearest residence on Homestead Drive could reach up to 85 dB, L_{max} when construction is occurring at the southern property line of the high school. Construction would only occur within the allowable hours of the City of Mill Valley Municipal Code §7.16.080(C), described above. Furthermore, the applicant shall implement Mitigation Measure NOISE-1 to reduce impacts from construction noise to off-site sensitive receptors (to be consistent with Goal N.3 and Policies N.4-1 through N.4-3 of the City of Mill Valley General Plan, Chapter 8 Noise Element). With implementation of Mitigation Measure NOISE-1, construction noise impacts on off-site sensitive receptors would be **less than significant**.

Due to the proximity of nearby school buildings on-site, construction activities have the potential to disrupt school activities or cause annoyance to on-site students, teachers, and staff. The District shall implement Mitigation Measure NOISE-2 to reduce impacts to on-site school activities. With implementation of Mitigation Measure NOISE-2, construction noise impacts to on-site school activities would be **less than significant**.

Operational Noise Impacts

Implementation of the Project would not result in a significant escalation of noise levels in areas where noise-sensitive uses exist. The Project would not change or expand any uses of the school and there would be no change in student enrollment or staffing. Once operational, the Project noise would not generate noise that would exceed what is currently generated by the existing school (See Table NOISE-2). As shown in Table NOISE-2, the main source of noise at nearby noise-sensitive areas is traffic noise from Miller Avenue, Almonte Drive, and Homestead Boulevard and not noise from current school operations. Therefore, operational noise would be a **less than significant impact**.

- b) Construction activities have the potential to result in varying degrees of temporary ground vibration, depending on the specific construction equipment used and operations involved. In most cases, vibration induced by typical construction equipment does not result in adverse effects on people or structures (Caltrans, 2013). Vibrational effects from typical construction activities are only a concern within 25 feet of existing structures (Caltrans, 2002). There are no off-site structures within 25 feet of the proposed construction site. Therefore, vibration would be a **less than significant impact**.
- c) The Project site is not within the vicinity of a private airstrip or an airport land use plan, or within 2 miles of a public use airport. The nearest airport is San Rafael Airport (the nearest runway of which is approximately 8.5 miles north of the Project site). Therefore, the Project would have **no impact** from airport noise.

Mitigation Measures

Mitigation Measure NOISE-1. To minimize disruption and potential annoyance during construction, the applicant shall implement the following construction noise reduction measures:

- All construction equipment shall be properly maintained and in good order.
- Locate staging areas at the greatest feasible distances away from noise-sensitive receptors adjacent to the Project site.
- Locate stationary noise-generating equipment (e.g., generators, air compressors) at the greatest feasible distances away from noise-sensitive receptors adjacent to the Project site.
- 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.

- Prior to construction activities, the applicant shall designate a “Construction Noise Coordinator” who would be responsible for responding to any local complaints about construction noise. The Construction Noise Coordinator shall determine the cause of the complaint and shall require implementation of reasonable measures to correct the problem. The telephone number for the Construction Noise Coordinator shall be conspicuously posted at the construction site. At least three weeks prior to the start of construction activities, the applicant shall provide written notification to all nearby residential units within 300 feet of the construction site informing them of the estimated start date and duration of construction activities, the role of the Construction Noise Coordinator, and how to contact the Construction Noise Coordinator.

Mitigation Measure NOISE-2: The District Construction Contractor shall coordinate with the school principal or site administrator to limit 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.

XIV. Population and Housing

Would the Project:

Environmental Issue	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?				X
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?				X

Discussion

- a) The Project would not directly or indirectly increase population growth because no new housing, enrollment or permanent jobs are proposed as part of the Project. The Project site and surrounding areas are developed with urban land uses and no extensions of roads or other infrastructure would be required that would indirectly induce growth. Therefore, the Project would not induce new development on nearby lands, and **no impact** would occur.

- b) The Project site contains an existing school campus and facilities, with no housing. The Project would not displace existing housing or people, so there would be **no impact**.

XV. Public Services

Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the following public services:

Environmental Issue	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Fire protection?				X
b) Police protection?				X
c) Schools?				X
d) Parks?				X
e) Other public facilities?				X

Discussion

- a) The Southern Marin Fire Protection District (SMFD) provides fire protection and emergency medical services for the school. The fire station nearest the Project site is Station #7, located at 1 Hamilton Drive Ave, Mill Valley, approximately 0.5 miles east of the Project site. Replacement of existing school buildings would not materially alter uses of the site, and therefore would not result in a substantive increase in demand for fire protection services. The Project would not require the provision of or need for new or physically altered facilities to continue to serve the Project site, as the new school buildings would include fire protection components as required under current codes and would replace existing similar buildings. In addition, the Project would be subject to fire safety review by the Office of the State Architect. Therefore, the Project would have **no impact** to fire protection services.
- b) The school is served by the Mill Valley Police Department, located at 1 Hamilton Drive, Mill Valley, approximately 0.5 miles east of the school. As discussed for fire, above, the Project would be the demolition and replacement of existing school buildings and therefore would not increase the need for police services. No new police facilities would be required. Therefore, **no impact** would occur to police services.
- c) The Project would encompass the demolition and replacement of existing school buildings. It would not increase the population or otherwise increase demand for school services. It would not alter the enrollment of students at the school. Therefore, the Project would have **no impact** on schools.

- d) As described above, the Project would not result in an increase in residents and therefore, would not increase demand for any parks facilities. For this reason, the Project would have **no impact** on recreational facilities.
- e) No other public facilities would be required by the Project. Therefore, there would be **no impact** on other public facilities.

XVI. Recreation

Environmental Issue	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Would the Project increase the use of existing neighborhood and regional parks or other recreational facilities such that physical deterioration of the facility would occur or be accelerated?				X
b) Does the Project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?				X

Discussion

- a) As described in response to item d) under Public Services, the Project would have no adverse effects on parks and other recreational facilities. Therefore, the Project would not cause physical deterioration of any recreational facility to occur or be accelerated, and **no impact** would occur.
- b) The Project would not increase employment or enrollment at the school. The Project would not require the construction or expansion of recreational facilities and **no impact** would occur.

XVII. Transportation/Traffic

Would the Project:

Environmental Issue	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit roadways, pedestrian and bicycle facilities?				X
b) Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b) (vehicle Miles traveled)?			X	
c) Substantially increase hazards due to design features (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?				X
d) Result in inadequate emergency access?				X

Discussion

- a) The Project would not alter uses or any traffic routes compared to existing conditions at the school. Minor construction traffic would not conflict with program, plan, ordinance, or policy addressing the circulation system, including transit roadways, pedestrian, and bicycle facilities. Therefore, the Project would have **no impact** with respect to any such plan or policy, or underlying circulation systems.
- b) With the passage of Senate Bill SB 743 in 2013 and full implementation on July 1, 2020, Vehicle Miles Traveled (VMT) became the main metric to evaluate transportation impacts of proposed development projects. Traffic LOS and parking deficiencies are no longer considered significant impacts in CEQA analysis. With SB 743, most development projects need to provide a VMT analysis to determine traffic impacts. However, there are several exceptions. These include small projects that generate fewer than 110 daily trips; locally serving retail and similar land uses; and locally serving public facilities such as public schools and parks.

As discussed above, the Project is a reconstruction of existing school buildings, and would not result in additional enrollment or employment that would change the current traffic circulation patterns and operations in the area. The Project would reduce available parking by approximately 30 spaces. Loss of parking is not considered a potentially significant impact under CEQA. The Project is a public school that serves the students from the nearby community and, as such, would be exempt from VMT analysis. In addition, Project construction traffic is exempt from VMT analysis. According to the Governor’s Office of Planning and Research (Technical Advisory on Evaluating Transportation Impacts in CEQA,

April 2018), similar to small projects, locally serving retail and land uses, and local-serving public facilities, including schools, are presumed to have a less-than-significant impact on VMT. As indicated above, the Project is not a new project but the replacement of existing buildings and would be mainly used by the school. As such, the VMT impact of the Project would be **less than significant**.

- c, d) The Project would not introduce new design features or other changes that are incompatible with the existing transportation infrastructure or otherwise adversely affect emergency access, and it would not create any traffic hazards. Therefore, **no impact** would occur.

XVIII. Tribal Cultural Resources

Would the project:

Environmental Issue	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Would the project cause a significant adverse change in the significance of a tribal cultural resource defined in Public Resource Code Section 21074 as either a site, feature, place cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or			X	
ii) 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 Public Resources Code section 5024.1. In applying criteria set forth in subdivision (c) of Public Resources Code section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.		X		

Background

The 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 November 22, 2023, 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 (Attachment B). On December 4th, 2023, 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 December 6, 2023, inquiring if they had any knowledge of culturally sensitive properties or archaeological sites within or near the project area. On January 4, 2024, Ms. Buffy McQuillen, Tribal Historic Preservation Officer for the Federated Indians of Graton Rancheria (Graton Rancheria) contacted SAS and requested the "...results of research efforts and recommendation.". The TUHSD has provided Graton Rancheria with the SAS report and is in consultation with the tribal representative. Results of the consultation will be incorporated into the Final Initial Study, as required under AB 52.

Discussion

a) i., ii. As described in the Cultural Resources section, because the site has already been graded and is the location of an existing high school facility, and because the project would have minimal earthmoving beyond the previously graded depths, impacts to culturally sensitive sites would be unlikely. Additionally, Mitigation Measure CULT-1 in the Cultural Resources section would address impacts on any unknown burials. The TUHSD has provided Graton Rancheria with the SAS report and is in consultation with the tribal representative. Results of the consultation will be incorporated into the Final Initial Study, as required under AB 52. Consultation with Graton and incorporation of applicable tribal requests would assure that potential tribal cultural resource impacts would be reduced to **less than significant**.

XIX. Utilities and Service Systems

Would the Project:

Environmental Issue	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?			X	
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?			X	
c) Result in a determination by the waste water treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?			X	
d) Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?			X	
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?			X	

Background

Wastewater treatment and conveyance services in Mill Valley are provided by the Sewerage Agency of Southern Marin (SASM). The SASM is a Joint Powers Agency founded in 1979 and is made up of six member agencies, including the City of Mill Valley. Each member agency owns, operates, and maintains a sanitary sewer system which carries wastewater to the wastewater treatment plant. Water treated at the plant flows through several treatment units to remove pollutants and organics materials before it is disinfected and pumped six miles to Tiburon for deep-water discharge into the San Francisco Bay. Some of the processed wastewater is reclaimed and used for landscape irrigation. The wastewater treatment plant has a facility capacity of 24.7 million gpd for peak hour wet weather flow.

The City of Mill Valley purchases its water from the Marin Municipal Water District (MMWD). About 75% of the MMWD water supply originates from rainfall on the Mt. Tamalpais watershed and in

the grassy hills of west Marin, flowing into the MMWD's seven reservoirs. The MMWD also supplements its supply with water from the Sonoma County Water Agency (SCWA), which comes from the Russian River system in Sonoma County. The Russian River water supply originates from rainfall that flows into Lake Sonoma and Lake Mendocino. The MMWD does not rely substantially on groundwater.

Zero Waste Marin (ZWM) is the informal name for the Marin Hazardous and Solid Waste Joint Powers Authority (JPA), which is comprised of representatives from all over Marin County. ZWM is comprised of the city and town managers of Belvedere, Corte Madera, Fairfax, Mill Valley, Mill Valley, Novato, Ross, San Anselmo, San Rafael, Sausalito and Tiburon and the County of Marin. Zero Waste Marin ensures Marin's compliance with the California Integrated Waste Management Act and its waste reduction mandates. ZWM's mission is to help residents and businesses meet the county's Zero Waste goal by 2025 by reducing and recycling their solid waste and safely disposing of hazardous materials. ZWM provides information on household hazardous waste collection, recycling, composting, and waste disposal. The Marin County Department of Public Works/Waste Management administers Zero Waste Marin. The City of Mill Valley's solid waste collection and disposal is provided by Mill Valley Refuse Service.

Discussion

- a, b, c) The Project would demolish and replace existing school buildings and therefore would not substantively alter water demand. Therefore, impacts to water supplies and associated facilities would be minimal and **less than significant**. Similarly, the quantity of sewage generated is not expected to change substantially from that generated by the existing school facilities. These facilities would continue to discharge to the City of Mill Valley's sewer system. Therefore, this impact would be **less than significant**. The Project would increase impervious surfaces on the site with the addition of asphalt and concrete paving. However, peak runoff from the site would not be increased, as described in the Hydrology section of this IS. This impact would be **less than significant**.
- d, e) Because the Project would replace existing school buildings, there would be no substantial increase in solid waste generation as a result of Project operation. Solid waste would be generated during demolition of the existing buildings and construction of the new buildings. As much of this material would be reused and composted of as feasible. Therefore, the Project would have a **less than significant** impact on solid waste generation or disposal.

XX. Wildfire Hazards

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the Project:

Environmental Issue	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?				X
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?				X
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?				X
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?				X

Discussion

a, b) The Project site is situated in a developed urban area, surrounded by other urban uses. It is not designated as a fire hazard severity zone of moderate or higher¹⁶. Additionally, the reconstructed school buildings would include fire protection infrastructure (alarms, sprinklers, etc.) as required by current codes. Therefore, the Project would have **no impact** with respect to wildfire hazards.

c, d) The Project is in an urbanized area, and would not require any additional fire protection infrastructure or fuel breaks. Because of the developed state of the Project site and area, it would not expose people or structures to post-fire land instability or runoff issues. Therefore, the Project would have **no impact** with respect to these wildfire hazards.

¹⁶<https://gisopendata.marincounty.org/datasets/MarinCounty::fire-hazard-severity-zone-1/explore?location=37.864395%2C-122.502329%2C16.00>

IV. MANDATORY FINDINGS OF SIGNIFICANCE

Environmental Issue	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact
a) Does the Project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of an endangered, rare or threatened species or eliminate important examples of the major periods of California history or prehistory?		X		
b) Does the Project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a Project are considerable when viewed in connection with the effects of past Projects, the effects of other current Projects, and the effects of probable future Projects)?				X
c) Does the Project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?			X	

- a) Compliance with the mitigation measures for unknown cultural resources would ensure all potential impacts associated with cultural resources would be reduced to a **less than significant** level. Similarly, impacts to special-status birds would be mitigated to **less than significant** with measures included in this document.
- b) No other projects are proposed at the school that would overlap with the Project. Based on a review of the City of Mill Valley current projects lists¹⁷, there are currently no proposed development projects in the Project area. Therefore, the Project would not contribute to any cumulative impacts associated with development in the Project area. **No impact** would result.
- c) The Project would not increase long-term air pollutant emissions and greenhouse gas emissions because it would not add any net new workers or residents. The Project’s noise impacts would also be **less than significant** with mitigation. The Project’s hazards to human health and safety would be **less than significant**, as described in Section VIII of this Initial Study.

¹⁷ <https://www.cityofmillvalley.org/258/Projects>, accessed November 28, 2023.

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APPENDIX A: AIR QUALITY APPENDICES

**APPENDIX B: DRAFT MITIGATION MONITORING AND REPORTING
PROGRAM**