Dear Dr. Rohlfes:

I intend to speak before the IRP during the public comment period on next Wednesday. Please see the attached PDF for the areas I expect to address.

Warm regards,

David Gerard, Ph.D.
Managing Principal, Reflect Coaching
www.reflectcoaching.org
1-408-499-2819
August 4, 2017

Dear Independent Review Panel Members:

I intend to make a public comment during your Wednesday, August 9 meeting, in my role as a 24-year resident of Morgan Hill, and not as a member of the Morgan Hill Unified School Board. My comments in no way reflect the views or policies of the school district nor of any other board members.

Here in Morgan Hill, we are facing a potentially dangerous situation where we need the Department of Toxic Substances Control to act with a greater degree of independence from the school construction plans of the Morgan Hill Unified School District, which is attempting to build a K-5 elementary school on former farmland heavily laced with the toxic pesticide Dieldrin. The District in its recently submitted Removal Action Workplan has proposed excavating about 26,595 tons (19,700 cubic yards) of toxic soil and hauling it through our school district to a nearby landfill overlooking heavily travelled Highway 101. The proposed school site is less than two miles from both an active earthquake fault, and the largest dam in Santa Clara County, Anderson Dam. The school would be located in the middle of an existing neighborhood that does not want this school to be built. One of the key problems is that Dieldrin, which is here in concentrations up to 2000% above what the EPA uses as a safety screening level, easily attaches itself to soil and can be blown about by winds--and we have a very windy climate. Exposure to Dieldrin is associated with everything from convulsions to Parkinson's Disease.

We are disturbed that the staff of DTSC appears to be minimizing the risk, with their toxicologist saying at a July 27 Morgan Hill public meeting that it is only "slightly contaminated". This flies in the face of the most recent research on the risks posed by Dieldrin by esteemed Dutch toxicologist Henk A. Tennekes, in 2016 in the Journal of Environmental and Analytical Toxicology, see:

https://www.farmlandbirds.net/sites/default/files/2016-10/Tennekes%20HA%20(2016)%20Critical%20Appraisal%20of%20the%20Threshold%20of%20Toxicity%20Model%20for%20Non-Carcinogens%20JEAT.pdf

Dr. Tennekes argues that the risk threshold for Dieldrin used by regulatory agencies like EPA seriously underestimates the health risk and that this toxin must be totally removed. The DTSC plan is to simply remove enough soil to meet the long standing EPA guideline of .034mg/kg.

In fact, large amounts of Dieldrin would remain on this school site after the intended remediation plan, and with several large grassy playground areas, children will be exposed to this toxin on a daily basis. Research indicates that Dieldrin can be transported via earthworms

https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3547466

who ingest it and later expel it when they come to the soil surface from their burrows as much as six feet deep underground.

We were shocked when DTSC declined


to ask the school district to thoroughly retest the soil of the entire site following our heavy February inundations which led to floods just two blocks away in Coyote Creek which instantly closed off the
northbound 101 exit in Morgan Hill, just one half mile away from the proposed school site. The DTSC Project Manager permitted the District’s consultant to retest only 11% of the total site, and no testing at all was done after the heavy February floods.


And since Anderson Dam which overlooks the school site will not be seismically retrofitted until 2024,

http://www.morganhilltimes.com/news/community/anderson-retrofit-project-cost-jumps-to-

m/article_dd839be8-ddbd-11e6-a4ee-afd954bf88ad.html

the possibility however remote of a natural disaster that would trap 600 school children and their teachers is too painful to contemplate. See also

http://temblor.net/earthquake-insights/seismic-stability-concerns-at-anderson-dam-2554/

and

http://www.valleywater.org/Services/AndersonDamAndReservoir.aspx

Instead of the previously forecast two hour window for students to evacuate the new Borello School, the latest research suggests that because of the school’s proximity to Anderson Dam, flood waters would begin entering the school within five minutes of the dam’s failure and likely liquefaction.

Regrettably, the June 30, 2017 Draft CEQA was based on obsolete inundation studies that were done in 2014 and not updated with the December 9, 2016 Santa Clara Valley Water District revised Anderson Dam retrofit plan.

Therefore, because of:

1. The latest toxicology research that questions the validity of the current screening level for Dieldrin,
2. The inadequacy of recent soil testing at the proposed school site, which thus minimized potential health and safety risks that the RAW will not address,
3. The poor overall quality of the Removal Action Workplan and the CEQA,
4. The near-term and long-term flood inundation risks brought about by the proposed school’s proximity to an active earthquake fault and a seismically unfit dam, and
5. The strong neighborhood opposition to the construction of this school based on legitimate health and safety concerns, (see YouTube video of June 27, 2017 MHUSD Special Meeting):

   https://www.youtube.com/watch?v=5nRAY_dzV0

I therefore urge the Independent Review Panel to exercise its influence to encourage DTSC to suspend or deny approval of the proposed Removal Action Workplan (RAW) for the Borello School Property in Morgan Hill.

Best regards,

Dr. David Gerard
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Morgan Hill, CA 95037