

Draft Initial Study / Proposed Mitigated Negative Declaration

Lynwood Pump Station Replacement

City of Novato, California



Prepared for:

North Marin Water District
999 Rush Creek Place
Novato, CA 94945

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List of Acronyms and Abbreviations

AB	Assembly Bill
BAAQMD	Bay Area Air Quality Management District
BMPs	best management practices
CAAQS	California ambient air quality standards
CAL FIRE	California Department of Forestry and Fire Protection
Caltrans	California Department of Transportation
Cal/OSHA	California Division of Occupational Safety and Health
CAP	Clean Air Plan
CARB	California Air Resources Board
CBC	California Building Code
CCAP	Climate Change Action Plan
CDC	California Department of Conservation



CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CESA	California Endangered Species Act
CE&G	Cal Engineering & Geology, Inc.
CFGC	California Fish and Game Code
CGS	California Geological Survey
City	City of Novato
CNDDDB	California Natural Diversity Database
CNEL	Community Noise Equivalent Level
CNPS	California Native Plant Society
CO	carbon monoxide
Corps	United States Army Corps of Engineers
County	Marin County
CO₂	carbon dioxide
CO₂e	CO ₂ equivalent
CPUC	California Public Utilities Commission
C&D	construction and demolition
dB	decibel
dBA	A-weighted sound level
District	North Marin Water District
DPM	diesel particulate matter
DTSC	Department of Toxic Substances Control
EPA	Environmental Protection Agency
ESA	Endangered Species Act
FEMA	Federal Emergency Management Agency
FHSZ	Fire Hazard Severity Zone
F&L	Freyer & Laureta, Inc.
FTA	Federal Transit Administration
GHG	greenhouse gas
HI	Hazard Index
HRA	Health Risk Assessment
HVAC	heating, ventilation, and air conditioning
Hz	Frequency
IS/MND	Initial Study / Mitigated Negative Declaration
lb	pound
L_{dn}	day-night average noise level
L_{eq}	energy-equivalent noise level
L_{max}	maximum noise level
LT	Long-term
MBTA	Migratory Bird Treaty Act
MCE	Marin Clean Energy
MEIR	maximally exposed individual resident
MEIS	maximally exposed individual student
MMTCO₂e	million metric tons of carbon dioxide equivalent
MT	metric tons
NAAQS	National Ambient Air Quality Standard
NAHC	Native American Heritage Commission
NCCP	Natural Community Conservation Plan



NMFS	National Marine Fisheries Service
NOx	nitrogen oxides
NPDES	National Pollution Discharge Elimination System
NRCS	Natural Resource Conservation Service
OEHHA	Office of Environmental Health Hazard Assessment
OPR	Office of Planning and Research
Origer	Tom Origer & Associates
O₃	ozone
PG&E	Pacific Gas and Electric Company
PM	particulate matter
PM2.5	fine particulate matter
PM10	respirable particulate matter
POTW	publicly owned treatment works
PPV	Peak Particle Velocity
PS	pump station/s
Rank	California Rare Plant Rank
RCRA	Resource Conservation and Recovery Act
RMS	Root Mean Square
ROG	reactive organic gas
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SCWA	Sonoma County Water Agency
SF	square feet
SFBAAB	San Francisco Bay Area Air Basin
SOx	sulfur oxide
SRA	State Responsibility Area
ST	Short-term
SWPPP	Stormwater Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TAC	toxic air contaminant
TCE	trichloroethylene
TPH	total petroleum hydrocarbons
USDA	United States Department of Agriculture
USFWS	United States Fish and Wildlife Service
USGS	United States Geological Survey
UWMP	Urban Water Management Plan
VOC	volatile organic compound
VdB	Vibration Decibel
WRA	WRA, Inc.
WSCP	Water Shortage Contingency Plan
WUI	Wildland Urban Interface



1.0 INTRODUCTION AND PURPOSE

This Initial Study / Mitigated Negative Declaration (IS/MND) of environmental impacts is being prepared to conform to the requirements of the California Environmental Quality Act (CEQA), the CEQA Guidelines (California Code of Regulations 15000 et. seq.), and the regulations and policies of the North Marin Water District (District). This IS/MND evaluates the potential environmental impacts which might reasonably be anticipated to result from implementation of the Lynwood Pump Station Replacement (“proposed project” or “project”).

The District is the Lead Agency under CEQA and has prepared this IS/MND to address the impacts of implementing the proposed project. The purpose of the project is to replace the existing Lynwood pump station (PS) with either one or two new PS at a different location to continue to provide reliable potable water service to the District’s existing customers and to meet demands associated with future growth within the service area.

2.0 PROJECT INFORMATION

2.1 Project Title

Lynwood Pump Station Replacement Project

2.2 Lead Agency Name and Address

North Marin Water District
999 Rush Creek Place
Novato, CA 94945

2.3 Contact Person and Phone Number

Tim Fuelle, P.E., Senior Engineer
North Marin Water District
tfuelle@nmwd.com
(415) 897-4133

2.4 Project Location

The analysis provided in this IS/MND considers five potential alternatives for a proposed new PS or multiple PS to replace the existing Lynwood PS. To develop each of the five alternatives, a total of five potential sites on which a new pump station would be located, all of which are within the City of Novato (City) (Figure 1). Each potential alternative would be an alternative to replace the existing Lynwood PS and are all analyzed in the IS/MND at the same level of detail. These sites are located as follows:

- Sunset Parkway Site (Site 1): Within the Sunset Parkway median between Monte Maria Avenue and Cambridge Street.
- Ignacio Boulevard Site (Site 2): Within an open space area south of the intersection of Ignacio Boulevard and Palmer Drive.



- Bolling Drive Site (Site 3): Within an open space area northeast of the intersection of Bolling Drive and Bolling Circle. A pump station built at the Bolling Drive site requires construction of a parallel pump station at the Ignacio Boulevard Site (Site 2).
- Main Gate Road Site (Site 4): Within a public property situated along the south side of Main Gate Road between its intersection with Nave Drive and C Street. The site is situated in an open space area adjacent to the northeastern corner of a parking lot covered with solar canopies. A pump station built at the Main Gate Road Site (Site 4) requires construction of a parallel pump station at the Ignacio Boulevard Site (Site 2).
- C Street Site (Site 5): Within a baseball field situated adjacent northeast of the intersection of C Street and Main Gate Road. A pump station built at the C Street (Site 5) requires construction of a parallel pump station at the Ignacio Boulevard Site (Site 2).

Further discussion about which sites are included in each of the five alternatives is further discussed in Section 3.0 Project Description. The analysis provided herein will also evaluate the potential impacts of demolishing the existing Lynwood PS, which is located on Sunset Parkway between Lynwood Drive and South Novato Boulevard (Existing PS Site).



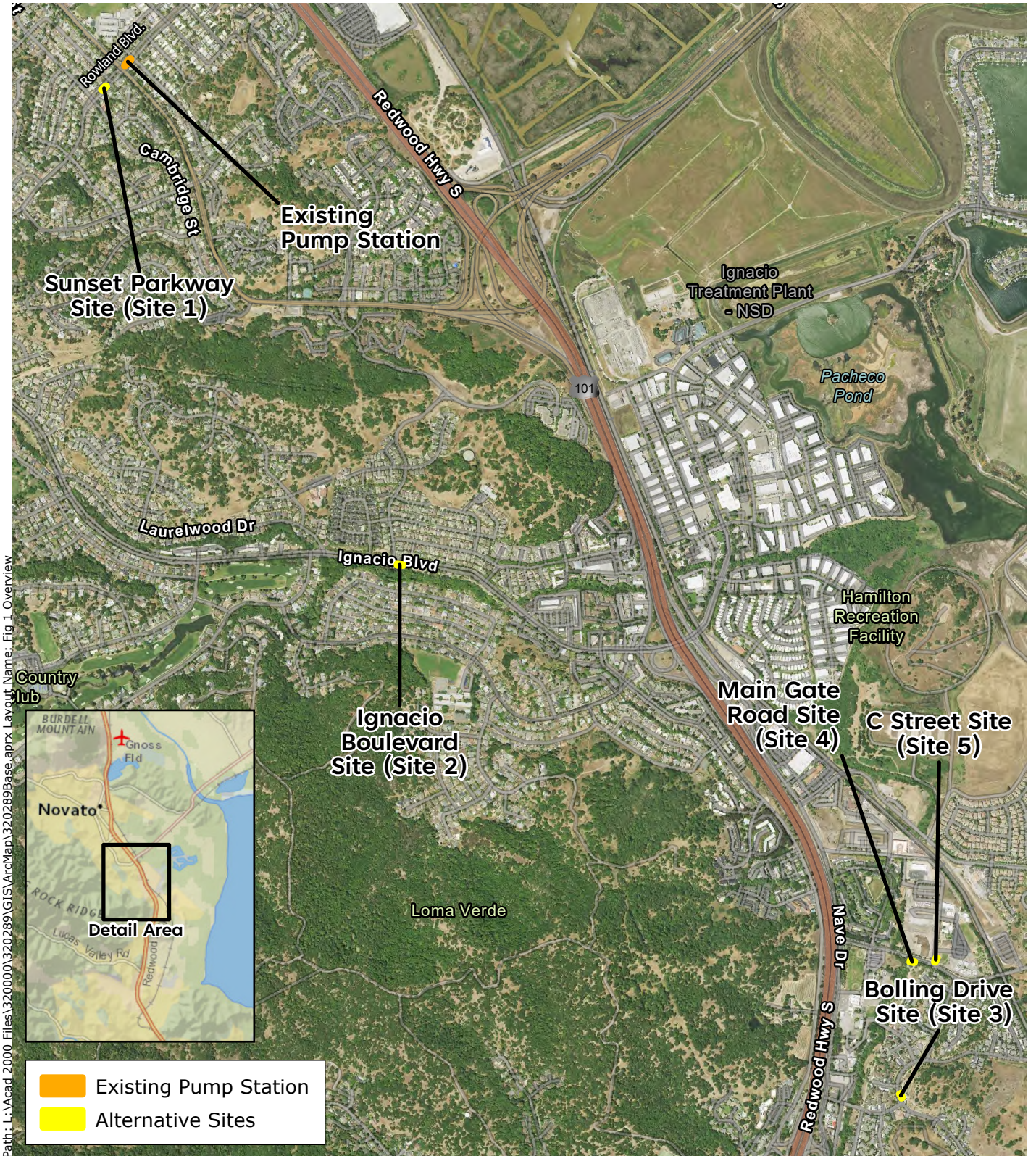
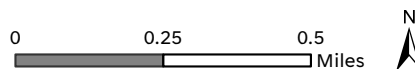


Figure 1. Project Regional Location Map

North Marin Water District
 Lynwood Pump Station Replacement
 Novato, California

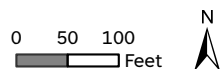




Sources: USDA NAIP Imagery 2020, WRA | Prepared By: kobylarz, 2/9/2024

Figure 2. Aerial Photograph of the Project Site and Staging Areas: Sunset Parkway Site (Site 1)

North Marin Water District
 Lynwood Pump Station Replacement
 Novato, California



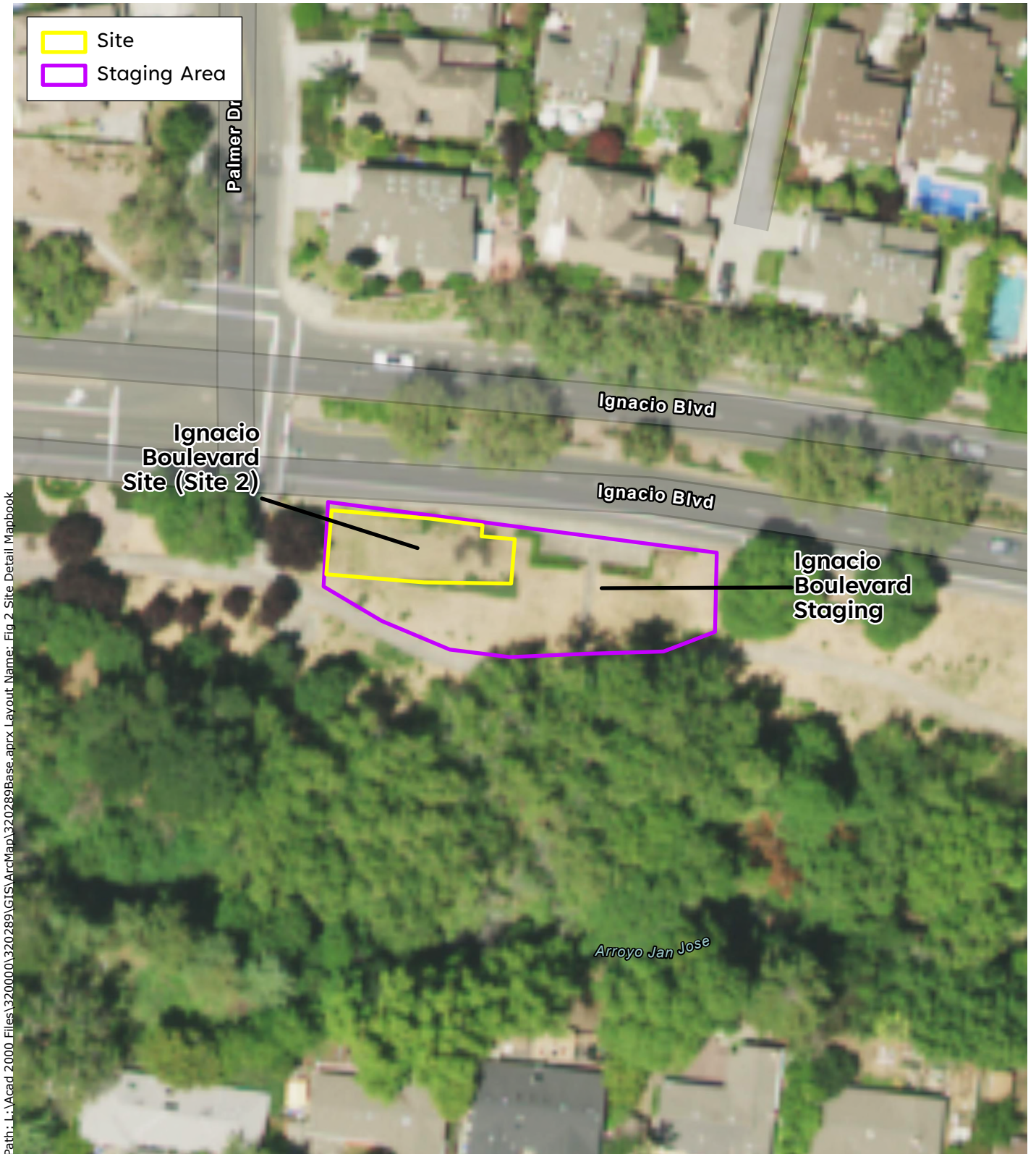
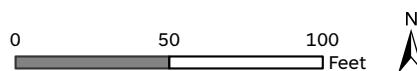


Figure 3. Aerial Photograph of the Project Site and Staging Areas: Ignacio Boulevard Site (Site 2)

North Marin Water District
 Lynwood Pump Station Replacement
 Novato, California



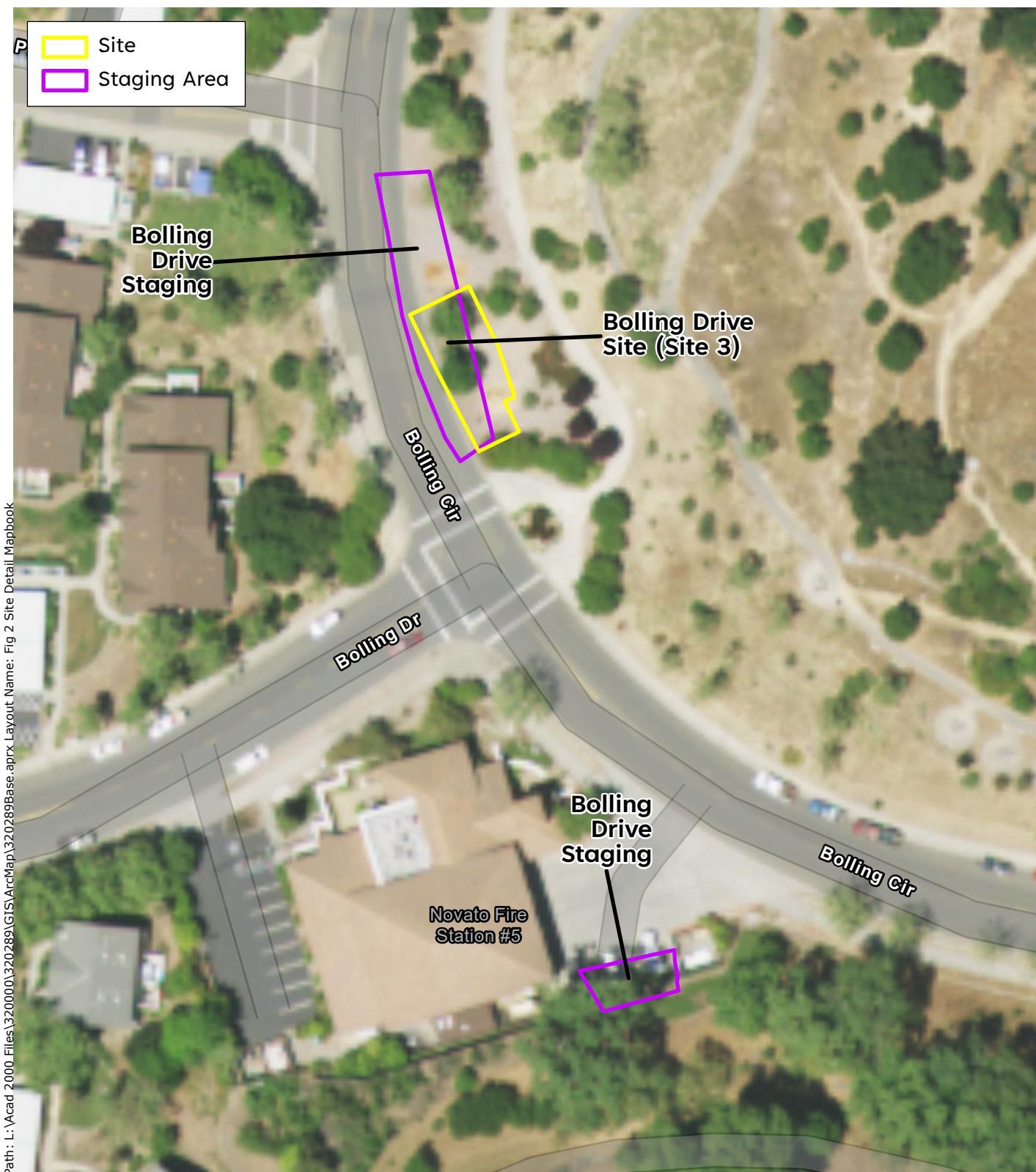
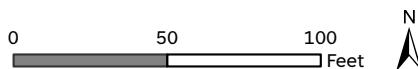
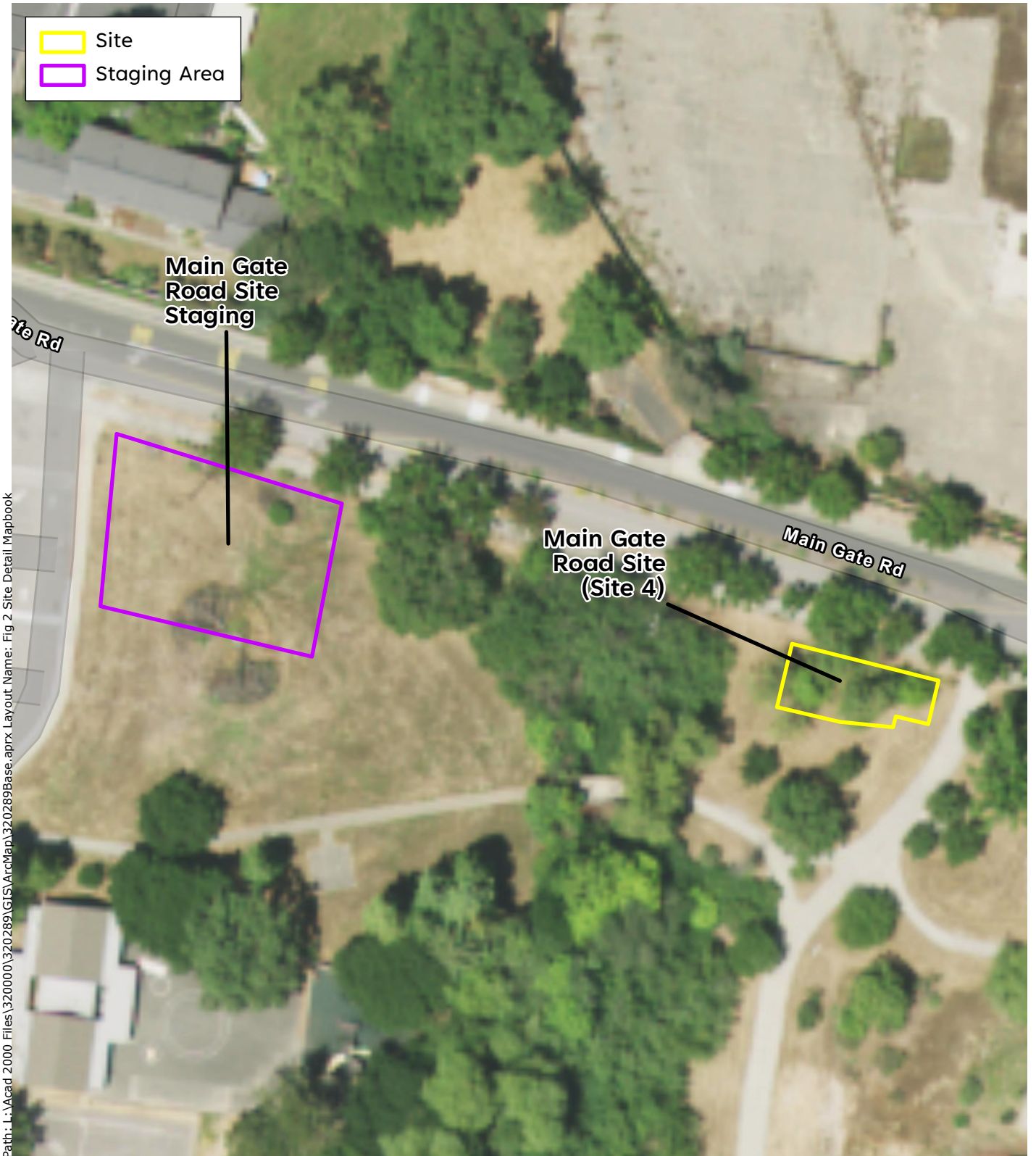


Figure 4. Aerial Photograph of the Project Site and Staging Areas: Bolling Drive Site (Site 3)

North Marin Water District
 Lynwood Pump Station Replacement
 Novato, California

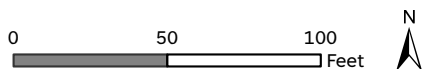




Sources: USDA NAIP Imagery 2020, WRA | Prepared By: kobylarz, 2/9/2024

Figure 5. Aerial Photograph of the Project Site and Staging Areas: Main Gate Road Site (Site 4)

North Marin Water District
Lynwood Pump Station Replacement
Novato, California



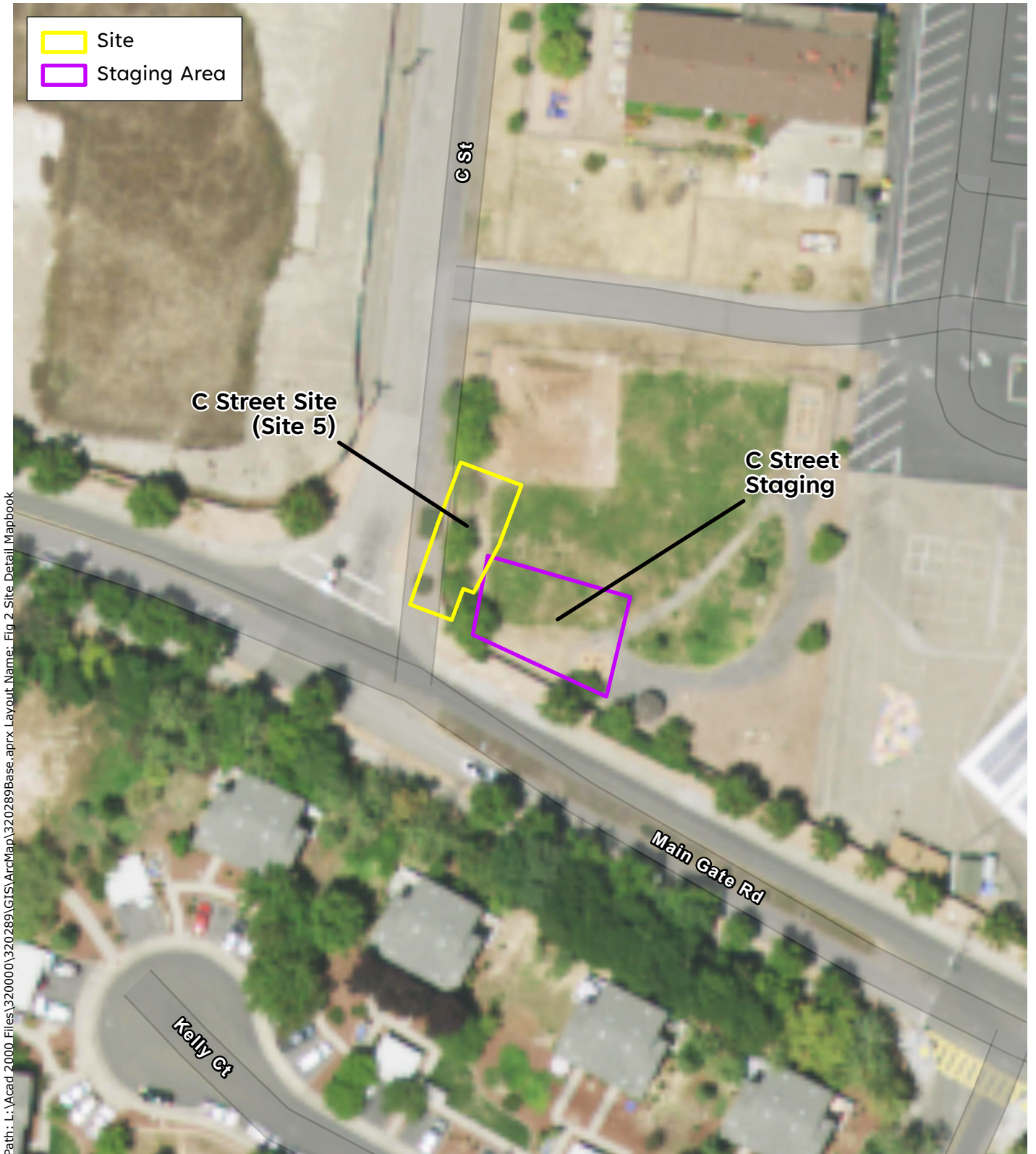


Figure 6. Aerial Photograph of the Project Site and Staging Areas: C Street Site (Site 5)

North Marin Water District
Lynwood Pump Station Replacement
Novato, California

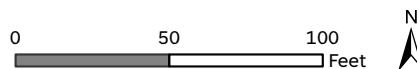




Photo of the Existing PS Site.



Photo of the Existing PS Site.



Photo of the Sunset Parkway Site (Site 1).



Photo of the Sunset Parkway Site (Site 1).

Figure 7. Photographs of Existing Conditions

Lynwood Pump Station Replacement

City of Novato, California





Photo of the Ignacio Boulevard Site (Site 2).



Photo of the Ignacio Boulevard Site (Site 2).



Photo of the Bolling Drive Site (Site 3).



Photo of the Bolling Drive Site (Site 3).

Figure 8. Photographs of Existing Conditions

Lynwood Pump Station Replacement Project

City of Novato, California





Photo of the Main Gate Road Site (Site 4).



Photo of the Main Gate Road Site (Site 4).



Photo of the C Street Site (Site 5).



Photo of the C Street Site (Site 5).

Figure 9. Photographs of Existing Conditions

Lynwood Pump Station Replacement

City of Novato, California



2.5 General Plan Designation and Zoning District

The General Plan land use designation and zoning district for each project site are provided below in Table 1.

Table 1. Existing General Plan Designation and Zoning District for Each Project Site

SITE	GENERAL PLAN DESIGNATION	ZONING DISTRICT
Sunset Parkway Site (Site 1)	Low Density Residential	R1-7.5 (Low Density Residential)
Ignacio Boulevard Site (Site 2)	Open Space	PD (Planned District)
Bolling Drive Site (Site 3)	Medium Density Residential	PD (Planned District)
Main Gate Road Site (Site 4)	Community Facilities, Public Utilities and Civic Uses	CF (Community Facilities)
C Street Site (Site 5)	Community Facilities, Public Utilities and Civic Uses	PD (Planned District)
Existing PS Site	Low Density Residential	R1-7.5 (Low Density Residential)

Source: (City of Novato “Map GP-1 Land Use”) (City of Novato 2001)

2.6 Surrounding Land Uses and Setting

Surrounding land uses of each project site are provided below in Table 2.

Table 2. Project Site Surrounding Land Uses

SITE	SURROUNDING LAND USES
Sunset Parkway Site (Site 1)	Low Density Residential, Community Facilities, Medium Density Multifamily Residential, High Density Multifamily Residential
Ignacio Boulevard Site (Site 2)	Low Density Residential, Medium Density Residential, Open Space
Bolling Drive Site (Site 3)	Open Space, Medium Density Residential
Main Gate Road Site (Site 4)	Community Facilities, Public Utilities and Civic Uses, Medium Density Residential, Open Space, Neighborhood Commercial
C Street Site (Site 5)	Community Facilities, Public Utilities and Civic Uses, Medium Density Residential
Existing PS Site	Low Density Residential, Community Facilities, High Density Multifamily Residential



3.0 PROJECT DESCRIPTION

3.1 Background Information and Project Purpose

The District primarily serves the City and surrounding unincorporated areas of Marin County (County), encompassing a service area of approximately 75 square miles. The existing PS is part of the Novato Service Area. The District's potable water supply for the Novato Service Area is divided into four main pressure zones. The existing Lynwood PS serves Primary Zone 2, along with the San Marin PS. Although these two PS meet current demands within Primary Zone 2, they are potentially not equipped to handle future growth within the zone (Freyer & Laureta 2023).

To inform future decision making, the District contracted with Freyer & Laureta, Inc. (F&L) to prepare an Engineering Assessment for the Lynwood PS.¹ The purpose of the assessment was to evaluate the condition of the existing PS, review projected future demands that may require the existing PS capacity to be increased, determine replacement options, and determine alternative site locations for a single new PS or multiple new PS. The existing conditions assessment evaluated the condition of the Lynwood PS based on access opportunities, location and environment, and mechanical and electrical components. F&L found that the Lynwood PS was in poor condition overall, and that multiple upgrades would be required to ensure that the PS is up to date with the latest code, to extend the service life, and to improve the overall reliability of the facility. These upgrades would be required even without considering potential expansion to meet future demands (F&L 2023).

The Engineering Assessment explained the potential advantages of rehabilitating the existing PS but determined that modifying or enhancing the PS is not feasible because of the overall age, condition, and significant site constraints that could result in significant and costly constructability challenges. Since the PS is below grade, the District's ability to perform repairs and upgrades is limited. District staff identified that it would be beneficial for the Lynwood PS to be reconstructed above grade to not only improve access but also to reduce the risk from groundwater and stormwater intrusion (F&L 2023). Therefore, F&L recommended that the District move forward in considering construction of a new PS at a different location, which would be built to current code and best practices for mechanical equipment layout for operational access, which would result in a new facility with a 50-year design life, at a minimum.²

3.2 Detailed Description of the Project

As recommended by the Engineering Assessment prepared by F&L, the District has decided to move forward with the replacement of the Lynwood PS at a different location. Five potential alternative solutions for replacing the existing Lynwood PS were identified in the Engineering Assessment. As described in Section 2.4, Project Location, there are five potential sites being considered for construction of a new PS. Each alternative would involve either a new PS at one of the sites or two new PS at a combination of the sites. The District has not yet selected which alternative solution will be implemented and would like to use the information in this IS/MND to help inform its decision. Therefore, this IS/MND considers the environmental impacts of each proposed alternative for the replacement of the existing Lynwood PS at the same level of detail.

¹ The Engineering Assessment (F&L 2023) is available for review at the North Marin Water District located at 999 Rush Creek Place in Novato, California.

² The District's depreciation policy sets a 50-year useful life for new PS (North Marin Water District 2023a).

To provide a conservative analysis of the potential impacts of the proposed project, this IS/MND analyzes impacts expected from the “worst-case scenario,” and therefore assumes demolition of the existing PS will be included as part of the project.

A detailed description of each alternative is provided in the sections following. Each new PS would include a pump station building and parking, as well as minimal ornamental and low-water use landscaping such as ground level shrubs and few trees. The analysis also considers that an emergency generator may be installed at each site, but the District may choose not to install an emergency generator as part of the final design effort that will be completed after the IS/MND. The footprint for pipe improvements assumes a ten-foot-wide T trench.

3.2.1 Alternative A

Alternative A would include one new PS with four pumps located at the Sunset Parkway Site (Site 1). This PS would include one additional pump to meet future demands. The Sunset Parkway Site is located approximately 330 feet southwest of the Existing PS Site. This alternative was chosen because the existing PS location provides the ability to meet demands to the north and south of the existing facility location, which is especially critical during peak demand periods (F&L 2023). The proposed PS footprint is approximately 2,000 square feet (SF) and proposed pipe improvements footprint is approximately 9,000 SF (Appendix A – Sheets C3 and M1).

3.2.2 Alternative B

Alternative B would include one new PS with four pumps located at the Ignacio Boulevard Site (Site 2). The Ignacio Boulevard Site is located approximately 1.3 miles south of the Existing PS Site. This alternative was chosen because, by relocating the PS away from the existing PS, the new PS could continue to provide adequate ability to meet future peak demands throughout Primary Zone 2 and would also improve the District’s ability to deliver water to the Pacheco Valley Tank (F&L 2023). The proposed PS footprint is approximately 2,000 SF and proposed pipe improvements footprint is approximately 37,500 SF (Appendix A – Sheets C4 and M2)

3.2.3 Alternative C

Alternative C would include the construction of two new PS, one at the Ignacio Boulevard Site (Site 2) and one at the Bolling Drive Site (Site 3). The new PS at the Ignacio Boulevard Site would include three pumps and the new PS at Bolling Drive Site would include two pumps. This alternative was developed to include both replacement of the Lynwood PS near the Existing PS Site and to add a third PS at a location within or in the vicinity of the southern portion of Primary Zone 2 that would improve the District’s ability to fill the Pacheco Valley Tank (F&L 2023) while also meeting future demands. The proposed PS footprint at the Ignacio Boulevard Site is approximately 1,800 SF and proposed pipe improvements footprint is approximately 37,500 SF (Appendix A – Sheets C4 and M3). The proposed PS footprint at the Bolling Drive Site is approximately 1,600 SF and proposed pipe improvements footprint is approximately 31,000 SF (Appendix A – Sheets C5 and M5).

3.2.4 Alternative D

Alternative D would include the construction of two new PS, one at the Ignacio Boulevard Site (Site 2) with three pumps, and one at the Main Gate Road Site (Site 4) with two pumps. This alternative would fulfill the same objectives as Alternative C given that the Main Gate Road Site (Site 4) is located approximately 0.3 miles north of the Bolling Drive Site (Site 3). The proposed

PS footprint at the Ignacio Boulevard Site is approximately 1,800 SF and proposed pipe improvements footprint is approximately 37,500 SF (Appendix A – Sheets C4 and M3). The proposed PS footprint at the Main Gate Road Site is approximately 1,600 SF and the proposed pipe improvements footprint is approximately 4,700 SF (Appendix A – Sheets C6 and M4).

3.2.5 Alternative E

Alternative E would include the construction of two new PS, one at the Ignacio Boulevard Site (Site 2) with three pumps, and one at the C Street Site (Site 5) with two pumps. This alternative would fulfill the same objectives as Alternative C given that the C Street Site is located approximately 0.3 miles north of the Bolling Drive Site (Site 3). The proposed PS footprint at the Ignacio Boulevard Site is approximately 1,800 SF and proposed pipe improvements footprint is approximately 37,500 SF (Appendix A – Sheets C4 and M3). The proposed PS footprint at the C Street Site is approximately 1,600 SF and the proposed pipe improvements footprint is approximately 1,200 SF (Appendix A – Sheets C7 and M5).

3.3 Project Construction

Conceptual plans for project design can be found in Appendix A and Building Dimension Exhibits for Alternatives A through E are provided in Appendix B. The following equipment would be required for project construction:

- Excavators - Both
- Rollers - Pipe
- Asphalt paving machine - Pipe
- Concrete mixer truck - Both
- Concrete pump - PS
- Forklifts – PS Pipe
- Dump trucks - Both
- Suction hoses - Pipe
- Discharge hose - Pipe
- Pump for dewatering purposes - Pipe
- Geosynthetic fabric - Both
- Plate compactors - Pipe
- Track loaders - Both
- Hydraulic vertical shoring system - Pipe
- Concrete vibrators - Both
- Water truck - Both
- Asphalt paver - Pipe
- Cement mixer - PS
- Air compressor - Both
- Portable generators - Both
- Tamping rammers – Pipe
- Utility Trucks

Construction equipment would be stored in designated staging areas, which are shown in Figures 2 through 6. The staging area on Sunset Parkway would be used for any project work at the Sunset Parkway Site or the Existing PS Site. Separate staging areas are identified for the four other sites on Ignacio Boulevard, Bolling Drive, Main Gate Road Site, and C Street Site.

Estimated import and export volumes for each alternative are provided below in Table 3.

Table 3. Project Import and Export Volumes

ALTERNATIVE	IMPORT VOLUME (CUBIC YARDS)	EXPORT VOLUME (CUBIC YARDS)
Alternative A	700	1,500
Alternative B	2,800	4,000
Alternative C	5,100	7,100
Alternative D	3,200	4,600
Alternative E	2,900	4,300

3.3.1 Construction Schedule

ALTERNATIVE A

Construction for Alternative A is anticipated to begin in 2025 and would last for an approximate duration of 17 months. Approximately 2,238 worker commute trips and 37 vendor trips would be required over the entire construction duration. A total of 106 demolition haul trips and 112 import haul trips for soil, aggregate, and concrete would be required.³

ALTERNATIVE B

Construction for Alternative B is anticipated to begin in 2025 and would last for an approximate duration of 17 months. Approximately 2,652 worker commute trips and 54 vendor trips would be required over the entire construction duration. A total of 309 demolition haul trips and 283 import haul trips for soil, aggregate, and concrete would be required.

ALTERNATIVE C

Construction for Alternative C is anticipated to begin in 2025 and would last for an approximate duration of 25 months.⁴ 3,968 worker commute trips and 97 vendor trips would be required over the entire construction duration. A total of 535 demolition haul trips and 504 import haul trips for soil, aggregate, and concrete would be required.

ALTERNATIVE D

Construction for Alternative D is anticipated to begin in 2025 and would last for an approximate duration of 25 months. Approximately 3,712 worker commute trips and 80 vendor trips would be required over the entire construction duration. A total of 353 demolition haul trips and 342 import haul trips for soil, aggregate, and concrete would be required.

ALTERNATIVE E

Construction for Alternative E is anticipated to begin in 2025 and would last for an approximate duration of 25 months. Approximately 3,688 worker commute trips and 80 vendor trips would be

³ Construction duration, worker and vendor trips, and demolition and import haul trips data was provided by Freyer & Laureta, Inc.

⁴ Under Alternatives C, D, and E, the second PS may be constructed at a later time, not within the same construction period as the first new PS.



required over the entire construction duration. A total of 328 demolition haul trips and 318 import haul trips for soil, aggregate, and concrete would be required.

3.4 Project-Related Approvals, Agreements, and Permits

The information contained in this IS/MND will be used by the District (the CEQA Lead Agency) as it considers whether or not to approve one of the project alternatives. If the project is approved, the IS/MND would be used by the District and responsible and trustee agencies in conjunction with various approvals and permits. These actions include, but may not be limited to, the following approvals by the agencies indicated:

3.4.1 City of Novato⁵

- Encroachment Permit

3.4.2 State Water Resources Control Board

- Stormwater Pollution Prevention Plan

3.4.3 Bay Area Air Quality Management District (only if emergency generator is installed)

- Authority To Construct
- Permit To Operate

⁵ The District is exempt from the City of Novato local ordinances with the exception of an Encroachment Permit.



4.0 ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by the project alternatives, involving at least one impact that is potentially significant unless mitigation is incorporated, as indicated by the checklist on the following pages.

<input type="checkbox"/> Aesthetics	<input type="checkbox"/> Greenhouse Gas Emissions	<input type="checkbox"/> Public Services
<input type="checkbox"/> Agricultural Resources	<input type="checkbox"/> Hazards and Hazardous Materials	<input type="checkbox"/> Recreation
<input checked="" type="checkbox"/> Air Quality	<input checked="" type="checkbox"/> Hydrology and Water Quality	<input type="checkbox"/> Transportation
<input checked="" type="checkbox"/> Biological Resources	<input type="checkbox"/> Land Use/Planning	<input checked="" type="checkbox"/> Tribal Cultural Resources
<input checked="" type="checkbox"/> Cultural Resources	<input type="checkbox"/> Mineral Resources	<input checked="" type="checkbox"/> Utilities / Service Systems
<input type="checkbox"/> Energy	<input type="checkbox"/> Noise	<input type="checkbox"/> Wildfire
<input checked="" type="checkbox"/> Geology and Soils	<input type="checkbox"/> Population and Housing	<input checked="" type="checkbox"/> Mandatory Findings of Significance

4.1 Determination

On the basis of this initial evaluation:

- I find that the project COULD NOT have a significant effect on the environment and a NEGATIVE DECLARATION will be prepared.
- I find that although the 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.
- I find that the project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT (EIR) is required.
- I find that the 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 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.



Signature

February 15, 2024

Date

Name and Title: Eric Miller, Chief Engineer/Assistant General Manager



4.2 Initial Study Checklist

This section describes the existing environmental conditions in and near the project sites and evaluates environmental impacts associated with each project alternative. The environmental checklist, as recommended in the CEQA Guidelines (Appendix G), was used to identify environmental impacts that could occur if the proposed project is implemented. The right-hand column in the checklist lists the source(s) for the answer to each question. The cited sources are identified at the end of this section.

Each of the environmental categories was fully evaluated for each project alternative, and one of the following four determinations was made for each checklist question:

“No Impact” means that no impact to the resource would occur as a result of implementing the project.

“Less than Significant Impact” means that implementation of the project would not result in a substantial and/or adverse change to the resource, and no mitigation measures are required.

“Less than Significant with Mitigation Incorporated” means that the incorporation of one or more mitigation measures is necessary to reduce the impact from potentially significant to less than significant.

“Potentially Significant Impact” means that there is either substantial evidence that a project-related effect may be significant, or, due to a lack of existing information, could have the potential to be significant.

In instances where project alternatives would result in different significance determinations for the same Initial Study Checklist question, the respective Checklist table will reflect the most substantial impact. However, the significance determination for each alternative is clearly identified in the discussion of impacts under each Checklist question.



4.2.1 Aesthetics

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) In non-urbanized 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

ENVIRONMENTAL SETTING

Sunset Parkway Site (Site 1)

The Sunset Parkway Site is situated in a median of Sunset Parkway in between Monte Maria Avenue and Cambridge Street. The median is currently developed with ornamental landscaping. Surrounding areas are developed as low-density residential neighborhoods and community facilities.

Ignacio Boulevard Site (Site 2)

The Ignacio Boulevard Site is situated within an open space area along the south side of the intersection of Ignacio Boulevard and Palmer Drive. The site is currently developed with ornamental landscaping. Surrounding areas include open space to the east and west, low-density and medium-density residential to the north, and low-density residential to the south.

Bolling Drive Site (Site 3)

The Bolling Drive Site is situated within an open space area on the eastern side of the intersection of Bolling Drive and Bolling Court. The site is currently developed with a paved walking path and ornamental landscaping. Surrounding areas include open space to the north and east, medium density residential to the west, and community facilities to the south.

Main Gate Road Site (Site 4)

The Main Gate Road Site is situated within a public property situated along the south side of

Main Gate Road between its intersection with Nave Drive and C Street. The site is situated in an open space area developed with ornamental landscaping. Surrounding areas include a vacant lot across Main Gate Road to the north, open space and medium density residential areas to the east, open space areas and the Hamilton School to the south, and the Hamilton School parking lot to the west.

C Street Site (Site 5)

The C Street Site is within a baseball field situated adjacent northeast of the intersection of C Street and Main Gate Road. Surrounding areas include a children’s center to the north, a charter school to the east, medium density residential areas across Main Gate Road to the south, and a vacant lot to the west.

Existing PS Site

The Existing PS Site is situated in a median of Sunset Parkway in between South Novato Boulevard and Lynwood Drive. The site is currently developed with the Lynwood PS and minimal ornamental landscaping. Surrounding areas are developed as low-density residential neighborhoods and community facilities.

DISCUSSION OF IMPACTS

a) Have a substantial adverse effect on a scenic vista?

Alternative A – Less than Significant Impact

The Sunset Parkway Site and Existing PS Site are situated in medians of Sunset Parkway surrounded by residential areas. Neither project site would be visible from a scenic vista. The Existing PS Site and Sunset Parkway Site are visible from public roads and sidewalks, and therefore, construction activities would alter existing public views of the site. This impact would be temporary and would not be substantial. The proposed new piping would be located underground, and the new PS building would be screened by landscaping and designed in a style that would fit into the surrounding environment. As such, the project would not have a substantial adverse effect on a scenic vista. The impact would be less than significant.

Alternative B – Less than Significant Impact

The Existing PS Site is situated in a median of Sunset Parkway and is surrounded by residential areas. The site is not visible from any scenic vistas. The Ignacio Boulevard Site is within a landscaped open space area near Ignacio Creek. The Ignacio Boulevard Site is visible from a nearby walking path along Ignacio Creek, and therefore, construction of the project would temporarily impact public views of the site. This impact would be temporary and would not be substantial. The proposed new piping would be located underground, and the PS building would be screened by landscaping and designed in a style that would fit into the surrounding environment. As such, the project would not have a substantial adverse effect on a scenic vista. The impact would be less than significant.

Alternative C – Less than Significant Impact

The Existing PS Site is situated in a median of Sunset Parkway and is surrounded by residential areas. The site is not visible from any scenic vistas. The Ignacio Boulevard Site is within a landscaped open space area near Ignacio Creek. The Ignacio Boulevard Site is visible from a nearby walking path along Ignacio Creek, and therefore, construction of the project would temporarily impact public views of the site. This impact would be temporary and would not be

substantial. The Bolling Drive Site is within a landscaped open space area and is surrounded by open space areas developed with walking paths. Construction at the Bolling Drive Site would temporarily impact public views to the east of the site; however, this impact would be temporary and would not be substantial. The proposed new piping would be located underground, and the PS building would be screened by landscaping and designed in a style that would fit into the surrounding environment. As such, the project would not have a substantial adverse effect on a scenic vista. The impact would be less than significant.

Alternative D – Less than Significant Impact

The Existing PS Site is situated in a median of Sunset Parkway and is surrounded by residential areas. The site is not visible from any scenic vistas. The Ignacio Boulevard Site is within a landscaped open space area near Ignacio Creek. The Ignacio Boulevard Site is visible from a nearby walking path along Ignacio Creek, and therefore, construction of the project would temporarily impact public views of the site. This impact would be temporary and would not be substantial. The Main Gate Road Site is within an open space area and is surrounded by open space areas developed with walking paths. Construction at the Main Gate Road Site would temporarily impact public views from areas east, south, and west of the site; however, this impact would be temporary and would not be substantial. The proposed new piping would be located underground, and the PS building would be screened by landscaping and designed in a style that would fit into the surrounding environment. As such, the project would not have a substantial adverse effect on a scenic vista. The impact would be less than significant.

Alternative E – Less than Significant Impact

The Existing PS Site is situated in a median of Sunset Parkway and is surrounded by residential areas. The site is not visible from any scenic vistas. The Ignacio Boulevard Site is within a landscaped open space area near Ignacio Creek. The Ignacio Boulevard Site is visible from a nearby walking path along Ignacio Creek, and therefore, construction of the project would temporarily impact public views of the site. This impact would be temporary and would not be substantial. The C Street Site is within a baseball field and is not visible from any scenic vistas. The proposed new piping would be located underground, and the PS building would be screened by landscaping and designed in a style that would fit into the surrounding environment. As such, the project would not have a substantial adverse effect on a scenic vista. The impact would be less than significant.

b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

Alternatives A through E - No Impact

There are no officially designated State Scenic Highways in the City (Caltrans 2018). The nearest eligible State Scenic Highway is a portion of U.S. Route 101 that extends from near Slade Park in the north to near Hana Ranch Road to the south (Caltrans 2018). California State Route (SR) 37, which enters the City in the northeast and ends at its intersection with U.S. 101, is also eligible to be an officially designated State Scenic Highway (Caltrans 2018). None of the project sites are visible from these routes due to local development and topography, and therefore project work would not damage any scenic resources within a State Scenic Highway corridor. No impact would occur.

c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? If the project is in an urbanized area,

would the project conflict with applicable zoning and other regulations governing scenic quality?

Alternative A – Less than Significant Impact

The Sunset Parkway Site and Existing PS Site are both situated in urbanized areas and are within the R1-7.5 (Low Density Residential) zoning district. The sites are both within landscaped roadway medians. The project would not conflict with allowable uses of the R1-7.5 zoning district or with any other regulations governing scenic quality. The District is exempt from the City of Novato local ordinances with the exception of an Encroachment Permit. The proposed new piping would be located underground, and the PS building would be screened by landscaping and designed in a style that would fit into the surrounding environment. As such, the project would not substantially degrade the existing visual character or quality of public views of the site and its surroundings. The impact would be less than significant.

Alternative B – Less than Significant Impact

The Ignacio Boulevard Site is within a landscaped open space area within the PD (Planned District) zoning district. The Existing PS Site is within a roadway median within the R1-7.5 (Low Density Residential) zoning district. Demolition of the Lynwood PS would not conflict with allowable uses of the R1-7.5 zoning district or with any other regulations governing scenic quality. The District is exempt from the City of Novato local ordinances with the exception of an Encroachment Permit. Construction of a new PS at the Ignacio Boulevard Site would not conflict with allowable uses of the PD zoning district or with any other regulation governing scenic quality. The proposed new piping would be located underground, and the PS building would be screened by landscaping and designed in a style that would fit into the surrounding environment. As such, the project would not substantially degrade the existing visual character or quality of public views of the site and its surroundings. The impact would be less than significant.

Alternative C – Less than Significant Impact

The Ignacio Boulevard Site and Bolling Drive Site are within landscaped open space areas within the PD (Planned District) zoning district. The Existing PS Site is within a roadway median within the R1-7.5 (Low Density Residential) zoning district. Demolition of the Lynwood PS would not conflict with allowable uses of the R1-7.5 zoning district or with any other regulations governing scenic quality. Construction of a new PS at the Ignacio Boulevard Site or Bolling Drive Site would not conflict with allowable uses of the PD zoning district or with any other regulation governing scenic quality. The proposed new piping would be located underground, and the PS buildings would be screened by landscaping and designed in a style that would fit into the surrounding environment. As such, the project would not substantially degrade the existing visual character or quality of public views of the site and its surroundings. The impact would be less than significant.

Alternative D – Less than Significant Impact

The Ignacio Boulevard Site is within landscaped open space areas within the PD (Planned District) zoning district. The Main Gate Road Site is within an open space area within the CF (Community Facilities) zoning district. The Existing PS Site is within a roadway median within the R1-7.5 (Low Density Residential) zoning district. Demolition of the Lynwood PS would not conflict with allowable uses of the R1-7.5 zoning district or with any other regulations governing scenic quality. The District is exempt from the City of Novato local ordinances with the exception of an Encroachment Permit. Construction of a new PS at the Ignacio Boulevard Site or Main Gate

Road Site would not conflict with allowable uses of the PD or CF zoning district or with any other regulation governing scenic quality. The proposed new piping would be located underground, and the PS buildings would be screened by landscaping and designed in a style that would fit into the surrounding environment. As such, the project would not substantially degrade the existing visual character or quality of public views of the site and its surroundings. The impact would be less than significant.

Alternative E – Less than Significant Impact

The Ignacio Boulevard Site is within landscaped open space areas within the PD (Planned District) zoning district. The C Street Site is within a baseball field owned by the Novato Charter School within the PD zoning district. The Existing PS Site is within a roadway median within the R1-7.5 (Low Density Residential) zoning district. The District is exempt from the City of Novato local ordinances with the exception of an Encroachment Permit. Demolition of the Lynwood PS would not conflict with allowable uses of the R1-7.5 zoning district or with any other regulations governing scenic quality. Construction of a new PS at the Ignacio Boulevard Site or C Street Site would not conflict with allowable uses of the PD zoning district or with any other regulation governing scenic quality. The proposed new piping would be located underground, and the PS buildings would be screened by landscaping and designed in a style that would fit into the surrounding environment. As such, the project would not substantially degrade the existing visual character or quality of public views of the site and its surroundings. The impact would be less than significant.

d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Alternative A – Less than Significant Impact

The proposed project would not create a new substantial source of light or glare which would affect day or nighttime views in the project site area. During construction, all work would take place during daytime hours. The only new source of nighttime lighting would be limited light at the entrance to the new PS building at the Sunset Parkway Site. The new PS building would not create a substantial new source of glare as its appearance would be softened by painting and landscaping. The impact would be less than significant.

Alternative B – Less than Significant Impact

The proposed project would not create a new substantial source of light or glare which would affect day or nighttime views in the project site area. During construction, all work would take place during daytime hours. The only new source of nighttime lighting would be limited light at the entrance to the new PS building at the Ignacio Boulevard Site. The new PS building would not create a substantial new source of glare as its appearance would be softened by painting and minimal ornamental landscaping. The impact would be less than significant.

Alternative C – Less than Significant Impact

The proposed project would not create a new substantial source of light or glare which would affect day or nighttime views in the project site area. During construction, all work would take place during daytime hours. The only new source of nighttime lighting would be limited light at the entrance to the new PS building at the Ignacio Boulevard Site and at the Bolling Drive Site. The new PS building would not create a substantial new source of glare as its appearance would be softened by painting and minimal ornamental landscaping. The impact would be less than significant.

Alternative D – Less than Significant Impact

The proposed project would not create a new substantial source of light or glare which would affect day or nighttime views in the project site area. During construction, all work would take place during daytime hours. The only new source of nighttime lighting would be limited light at the entrance to the new PS building at the Ignacio Boulevard Site and at the Main Gate Road Site. The new PS building would not create a substantial new source of glare as its appearance would be softened by painting and minimal ornamental landscaping. The impact would be less than significant.

Alternative E – Less than Significant Impact

The proposed project would not create a new substantial source of light or glare which would affect day or nighttime views in the project site area. During construction, all work would take place during daytime hours. The only new source of nighttime lighting would be limited light at the entrance to the new PS building at the Ignacio Boulevard Site and at the C Street Site. The new PS building would not create a substantial new source of glare as its appearance would be softened by painting and minimal ornamental landscaping. The impact would be less than significant.

CONCLUSION

Under Alternatives A through E, impacts related to aesthetics would be less than significant. The Sunset Parkway Site is located in the most developed area, and therefore Alternative A would have the least substantial impact on aesthetics. The Ignacio Boulevard Site, Bolling Drive Site, and Main Gate Road Site are in open space areas, and therefore Alternatives C and D would have the most substantial impact related to degradation of public views of the site because new PS would be developed at either the Ignacio Boulevard Site and Bolling Drive Site, or at the Ignacio Boulevard Site and Main Gate Road Site, respectively, under these Alternatives. However, the new PS buildings would be designed to blend into the surrounding environment and would be screened by minimal ornamental landscaping, and therefore, the impact would remain less than significant.



4.2.2 Agricultural and Forestry Resources

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

ENVIRONMENTAL SETTING

All five project sites and surrounding areas have been mapped as Urban and Built-Up Land in the Farmland Mapping and Monitoring Program compiled by the California Department of Conservation (DOC) (California DOC 2022a).

DISCUSSION OF IMPACTS

a-e) 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? Conflict with existing zoning for agricultural use, or a Williamson Act contract? 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))? Result in a loss of forest land or conversion of forest land to non-forest use? 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?

Alternatives A through E - No Impact

There is Farmland, forest land, or timberland located in the vicinity of the project sites. All of the project sites are mapped by the DOC as Urban and Built-Up Land (California DOC 2022). The project would not convert Farmland, forest land, or timber land to non-agricultural use, or conflict with an existing zoning for agricultural use or a Williamson Act contract. No impact would occur.

CONCLUSION

Under Alternatives A through E, the proposed project would have no impact related to agriculture and forestry resources, and no mitigation measures would be required. The impact would be the same under each Alternative.



4.2.3 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:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Result in other emissions (such as those leading to odors) affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

ENVIRONMENTAL SETTING

The project sites are located within the San Francisco Bay Area Air Basin (SFBAAB) which has natural characteristics that limit the ability of natural processes to either dilute or transport air pollutants. The major determinants of air pollution transport and dilution are climatic and topographic factors such as wind, atmospheric stability, terrain that influences air movement, and sunshine. Wind and terrain can combine to transport pollutants away from upwind areas, while solar energy can chemically transform pollutants in the air to create secondary photochemical pollutants such as ozone. The following discussion provides an overview of the environmental setting with regard to air quality in the SFBAAB.

Ambient Air Quality and Climate

The Bay Area has a Mediterranean climate characterized by wet winters and dry summers. During the summer, a high-pressure cell centered over the northeastern Pacific Ocean results in stable meteorological conditions and a steady northwesterly wind flow that generally keeps storms from affecting the California coast. During the winter, the Pacific high-pressure cell weakens, resulting in increased precipitation and the occurrence of storms. The highest air pollutant concentrations in the Bay Area generally occur during inversions, when a surface layer of cooler air becomes trapped beneath a layer of warmer air. An inversion reduces the amount of vertical mixing and dilution of air pollutants in the cooler air near the surface.

Due to the proximity of the San Francisco Bay and the Pacific Ocean, the climate in the SFBAAB is characterized by warm dry summers and cool moist winters. In summers, temperatures in the City generally range from the 50 to 80 degrees Fahrenheit, while winter temperatures range from 30 to upper 50 degrees (City of Novato 2020). The City lies mostly on the sheltered side of the

Marin coastal mountains and receives approximately 30 inches of precipitation per year, which mainly occurs throughout November to April. High-pressure systems are also common in winter, with low-level inversions that produce cool stagnant conditions (City of Novato 2020).

Air Pollutants of Concern

The California Air Resources Board (CARB) and United States Environmental Protection Agency (EPA) focus on the following air pollutants as regional indicators of ambient air quality:

- Ozone
- Coarse particulate matter (PM10)
- Fine particulate matter (PM2.5)
- Nitrogen dioxide
- Carbon monoxide
- Sulfur dioxide
- Lead

Because these are the most prevalent air pollutants known to be harmful to human health based on extensive criteria documents, they are referred to as “criteria air pollutants.” In the SFBAAB, the primary criteria air pollutants of concern are ground-level ozone formed through reactions of oxides of nitrogen (NOx) and reactive organic gases (ROG), PM10, and PM2.5. Regional air pollutants, such as ozone, PM10, and PM2.5, can be formed and/or transported over long distances and affect ambient air quality far from the emissions source. The magnitude and location of specific health effects from exposure to increased ozone, PM10, and PM2.5 concentrations are the result of emissions generated by numerous sources throughout the SFBAAB, as opposed to a single project.

Localized air pollutants generally dissipate with distance from the emission source and can pose a health risk to nearby populations. Toxic air contaminants (TACs), such as diesel particulate matter (DPM), are considered localized pollutants. PM2.5 is also considered a localized air pollutant, in addition to being considered a regional air pollutant. Air dispersion models can be used to reliably quantify the health risks to nearby receptors associated with emissions of localized air pollutants from an individual project.

Sensitive Receptors

Sensitive receptors are areas where individuals are more susceptible to the adverse effects of poor air quality. Sensitive receptors include, but are not limited to, hospitals, schools, daycare facilities, parks, elderly housing, and convalescent facilities. Residential areas are also considered sensitive receptors because people are often at home for extended periods, thereby increasing the duration of exposure to potential air contaminants. Existing sensitive land uses in the vicinity of each alternative site location are further described below in the detailed analysis of each project Alternative.

Sunset Parkway Site (Site 1) and Existing PS Site

Sensitive receptors near the Sunset Parkway Site and Existing PS Site include residences to the north, west, south, and east as close as 40 feet and the Lynwood Elementary School about 580 feet to the north of the Sunset Parkway Site. No off-site worker receptors are within 1,000 feet of the Sunset Parkway Site or Existing PS Site.

Ignacio Boulevard Site (Site 2)

Sensitive receptors near the Ignacio Boulevard Site include residences to the north, west, and



east as close as 140 feet. No off-site worker receptors are within 1,000 feet of the Ignacio Boulevard Site.

Bolling Drive Site (Site 3)

Sensitive receptors near the Bolling Drive Site include residences to the west, east, and south as close as 95 feet; the North Bay Children's Center and Tinker Way School Age Program about 585 feet to the north; the Novato Children's Center about 650 feet to the northwest; and, the Hamilton Meadow Park School about 880 feet to the northwest. The playground within the Clark A Blasdell Park is located about 300 feet north of the Bolling Drive Site. Off-site worker receptors are located at the Novato Fire Station 65 about 135 feet to the south and along Nave Drive as close as 635 feet west of the Bolling Drive Site.

Main Gate Road Site (Site 4)

Sensitive receptors near the Main Gate Road Site include residences to the east, south, and northwest as close as 155 feet; the Hamilton Meadow Park School about 300 feet to the southwest; the Novato Charter School about 375 feet to the northeast; the North Bay Children Center, C Street about 480 feet to the northeast; the Wonder Nook Preschool about 690 feet to the north; the North Bay Children's Center, Tinker Way School Age Program about 950 feet to the south; and, the Espino C Family Child Care about 975 feet to the east of the Main Gate Road Site. Off-site worker receptors are located about 860 feet to the northwest and 750 feet to the northeast of the Main Gate Road Site.

C Street Site (Site 5)

Sensitive receptors near the C Street Site include residences to the east, south, and northwest as close as 105 feet; the Hamilton Meadow Park School about 630 feet to the southwest; the Novato Charter School about 200 feet to the north; the North Bay Children Center, C Street about 330 feet to the north; the Wonder Nook Preschool about 880 feet to the northwest; the North Bay Children's Center, Tinker Way School Age Program about 980 feet to the south; and, the Espino C Family Child Care about 670 feet to the southeast of the C Street Site. Off-site worker receptors are located about 860 feet to the northwest and 650 feet to the northeast of the C Street Site.

REGULATORY SETTING

Federal and State Regulations

The federal EPA is responsible for implementing the programs established under the Federal Clean Air Act, such as establishing and reviewing the National Ambient Air Quality Standards (NAAQS) and judging the adequacy of State Implementation Plans to attain the NAAQS. A State Implementation Plan must integrate federal, state, and local plan components and regulations to identify specific measures to reduce pollution in nonattainment areas, using a combination of performance standards and market-based programs. If a state fails to enforce its implementation of approved regulations, or if the EPA determines that a State Implementation Plan is inadequate, the EPA is required to prepare and enforce a Federal Implementation Plan to promulgate comprehensive control measures for a given State Implementation Plan.

CARB is responsible for establishing and reviewing the California Ambient Air Quality Standards (CAAQS), developing and managing the California State Implementation Plans, identifying TACs, and overseeing the activities of regional air quality management districts. In California, mobile emissions sources (e.g., construction equipment, trucks, and automobiles) are regulated by CARB

and stationary emissions sources (e.g., industrial facilities) are regulated by the regional air quality management districts.

In accordance with the Federal Clean Air Act and California Clean Air Act, areas in California are classified as either in attainment, maintenance (i.e., former nonattainment), or nonattainment of the NAAQS and CAAQS for each criteria air pollutant. California’s 35 local Air Districts are responsible for regional air quality planning, monitoring, and stationary source and facility permitting. The project sites are within the jurisdiction of the Bay Area Air Quality Management District (BAAQMD). To assess the regional attainment status, the BAAQMD collects ambient air quality data from over 30 monitoring sites within the SFBAAB. Based on current monitoring data, the SFBAAB is designated as a nonattainment area for ozone, PM10 (CAAQS only), and PM2.5, and is designated an attainment or unclassified area for all other pollutants (Table 4).

Table 4. Air Quality Standards and Attainment Status

POLLUTANT	AVERAGING TIME	CAAQS		NAAQS	
		Concentration	Attainment Status	Concentration	Attainment Status
Ozone	8 Hours	0.070 ppm	N	0.070 ppm	N (marginal)
	1-Hour	0.09 ppm	N	Revoked in 2005	---
Carbon Monoxide	8 Hours	9.0 ppm	A	9 ppm	A
	1-Hour	20 ppm	A	35 ppm	A
Nitrogen Dioxide	1-Hour	0.18 ppm	A	0.100 ppm	U
	Annual	0.030 ppm	---	0.053 ppm	A
Sulfur Dioxide	24 Hours	0.04 ppm	A	0.14 ppm	A
	1-Hour	0.25 ppm	A	0.075 ppm	A
	Annual	---	---	0.030 ppm	A
Coarse Particulate Matter (PM10)	Annual	20 µg/m ³	N	---	---
	24 Hours	50 µg/m ³	N	150 µg/m ³	U
Fine Particulate Matter (PM2.5)	Annual	12 µg/m ³	N	12 µg/m ³	U/A
	24 Hours	---	---	35 µg/m ³	N (moderate)
Lead	30 Days	1.5 µg/m ³	A	---	---
	Calendar Quarter	---	---	1.5 µg/m ³	A
	Rolling 3 Months	---	---	0.15 µg/m ³	A

Source: BAAQMD 2017

Notes: A = Attainment; N = Nonattainment; U = Unclassified; “---“ = not applicable; ppm = parts per million; µg/m³ = micrograms per cubic meter; PST = Pacific Standard Time.



Regional Regulatory Framework

The BAAQMD is primarily responsible for ensuring that the NAAQS and CAAQS are attained and maintained in the SFBAAB. The BAAQMD fulfills this responsibility by adopting and enforcing rules and regulations concerning air pollutant sources, issuing permits, inspecting stationary sources of air pollutants, responding to citizen complaints, and monitoring ambient air quality and meteorological conditions.

The BAAQMD has adopted thresholds of significance to assist lead agencies in the evaluation of ozone precursors (NO_x and ROG), PM₁₀, and PM_{2.5} emitted from individual projects that could have a cumulatively considerable contribution to adverse air quality in the SFBAAB. The BAAQMD's thresholds of significance are summarized in Table 5.

ASSESSMENT METHODOLOGY

The project's potential impacts related to air quality were evaluated in accordance with the current BAAQMD CEQA Air Quality Guidelines. The project's estimated emissions associated with ROG, NO_x, PM₁₀, and PM_{2.5} were compared to the BAAQMD's thresholds of significance presented in Table 5.

Table 5. BAAQMD Project-level Thresholds of Significance

IMPACT ANALYSIS	POLLUTANT	THRESHOLD
Regional Air Quality (Construction)	ROG	54 pounds/day (average daily emission)
	NO _x	54 pounds/day (average daily emission)
	Exhaust PM ₁₀	82 pounds/day (average daily emission)
	Exhaust PM _{2.5}	54 pounds/day (average daily emission)
	Fugitive dust (PM ₁₀ and PM _{2.5})	Best management practices
	PM ₁₀	82 pounds/day (average daily emission) 15 tons/year (maximum annual emission)
	PM _{2.5}	54 pounds/day (average daily emission) 10 tons/year (maximum annual emission)
Local Community Risks and Hazards	Exhaust PM _{2.5} (project)	0.3 µg/m ³ (annual average)
	TACs (project)	Cancer risk increase > 10.0 in one million Chronic hazard index > 1.0



	Exhaust PM2.5 (cumulative)	0.8 µg/m ³ (annual average)
	TACs (cumulative)	Cancer risk > 100 in one million Chronic hazard index > 10.0

Source: BAAQMD 2023

Notes: ROG = reactive organic gases; NOx = oxides of nitrogen; PM10 = coarse particulate matter; PM2.5 = fine particulate matter; TACs = toxic air contaminants; µg/m3 = micrograms per cubic meter+

DISCUSSION OF IMPACTS

a) Conflict with or obstruct implementation of the applicable air quality plan?

Alternative A through Alternative E – Less than Significant Impact

The BAAQMD’s 2017 Clean Air Plan (CAP) is the applicable air quality plan for projects located in the SFBAAB. Consistency may be determined by evaluating whether the project supports the primary goals of the 2017 CAP, including applicable control measures contained within the 2017 CAP, and would not conflict with or obstruct implementation of any 2017 CAP control measures. The primary goals of the 2017 CAP are the attainment of ambient air quality standards and reduction of population exposure to air pollutants for the protection of public health in the Bay Area (BAAQMD 2017). As described further in Impact b), the project’s air pollutant emissions would not result in a cumulatively considerable net increase in criteria air pollutants for which the region is in nonattainment or expose the local community to substantial air pollutant concentrations.

The 2017 CAP includes control measures that aim to reduce air pollution and greenhouse gases (GHGs) from stationary, area, and mobile sources. The control measures are organized into nine categories: stationary sources, transportation, buildings, energy, agriculture, natural and working lands, waste, water, and super-GHG pollutants (e.g., methane, black carbon, and fluorinated gases). The consistency of the proposed project with control measures from the 2017 CAP is summarized in Table 6.

Table 6. Project Consistency with BAAQMD 2017 CAP

CONTROL MEASURES	PROPOSED PROJECT CONSISTENCY
Stationary Sources	Consistent. The stationary source measures are enforced by the BAAQMD pursuant to its authority to control emissions from permitted facilities. As described below in Impact b), the project would require an emergency diesel generator at each new PS site. Control measure SS32 applies to emergency backup generators and aims to “reduce emissions of diesel PM and black carbon from backup emergency generators through Draft Rule 11-18, resulting in reduced health risks to impacted individuals, and in climate protection benefits.” Under Rule 11-18, the BAAQMD conducts health risk assessments for facilities whose emissions pose potentially high health risks. Those facilities whose emissions are found to have health risks at or above a specific risk action level must prepare and implement a risk reduction plan that is approved by the BAAQMD. A Health Risk Assessment (HRA) for the proposed project was prepared by Baseline Environmental Consulting in January 2024 (included in Appendix C). As described below in Impact c), emissions from emergency



	generators installed as part of the project would not exceed BAAQMD thresholds of significance. Therefore, the proposed project would be consistent with stationary source control measures of the 2017 CAP.
Transportation	Not applicable. The transportation control measures are designed to reduce vehicle trips, use, miles traveled, idling, or traffic congestion for the purpose of reducing vehicle emissions. The project operation would not cause a significant increase in vehicle trips compared to the existing conditions. Therefore, the transportation control measures of the 2017 CAP are not applicable to the project.
Energy	Not applicable. The energy control measures are designed to reduce emissions of criteria air pollutants, TACs, and GHGs by decreasing the amount of electricity consumed in the Bay Area, as well as decreasing the carbon intensity of the electricity used by switching to less GHG-intensive fuel sources for electricity generation. Since these measures apply to electrical utility providers and local government agencies (and not individual projects), the energy control measures of the 2017 CAP are not applicable to the project.
Buildings	Consistent. The BAAQMD has authority to regulate emissions from certain sources in buildings such as boilers and water heaters, but has limited authority to regulate buildings themselves. Therefore, the building control measures focus on working with local governments that have authority over local building codes to facilitate adoption of best GHG control practices and policies. The District is not required to obtain a building permit from the City; however, the project would comply with all applicable requirements of the California Building Code (CBC) for the construction of new PS buildings. Therefore, the project would be consistent with the buildings control measures of the 2017 CAP.
Agriculture	Not applicable. The agriculture control measures are designed primarily to reduce emissions of methane. Since the project does not include any agricultural activities, the agriculture control measures of the 2017 CAP are not applicable to the project.
Natural and Working Lands	Not applicable. The control measures for the natural and working lands sector focus on increasing carbon sequestration on rangelands and wetlands, as well as encouraging local governments to adopt ordinances that promote urban tree plantings. Since the project does not include the disturbance of any rangelands or wetlands, the natural and working lands control measures of the 2017 CAP are not applicable to the project.
Waste Management	Not applicable. The waste management measures focus on reducing or capturing methane emissions from landfills and composting facilities, diverting organic materials away from landfills, and increasing waste diversion rates through efforts to reduce, reuse, and recycle. The project would generate minimal amounts of waste. Therefore, the waste management measures of the 2017 CAP are not applicable to the project.
Water	Consistent. The water control measures to reduce emissions from the water sector will reduce emissions of criteria pollutants, TACs, and GHGs



	by encouraging water conservation, limiting GHG emissions from publicly owned treatment works (POTWs), and promoting the use of biogas recovery systems. The project would increase the reliability of the POTW water distribution system, and therefore, the proposed project would be consistent with the water control measures of the 2017 CAP.
Super GHGs	Not applicable. The super-GHG control measures are designed to facilitate the adoption of best GHG control practices and policies through the BAAQMD and local government agencies. Since these measures do not apply to individual projects, the super-GHG control measures of the 2017 CAP are not applicable to the project.

Source: BAAQMD 2017

As show above in Table 6, the project under each Alternative would be consistent with applicable control measures from the 2017 CAP. Therefore, the project would not conflict with or obstruct implementation of the applicable air quality plan, and the impact would be less than significant.

b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

Alternative A through Alternative E – Less than Significant Impact with Mitigation Incorporated

Project construction activities would generate criteria air pollutant emissions that could potentially affect regional air quality. During construction, the primary pollutant emissions of concern would be ROG, NOx, PM10, and PM2.5 from the exhaust of off-road construction equipment and on-road construction vehicles related to worker vehicles, vendor trucks, and haul trucks. In addition, fugitive dust emissions of PM10 and PM2.5 would be generated by soil disturbance and demolition activities. The project’s emissions of fugitive dust during construction are analyzed separately, further below.

The BAAQMD recommends using the most current version of the California Emissions Estimator Model (CalEEMod Version 2022.1) to estimate construction and operational emissions of pollutants from a project. CalEEMod uses widely accepted models for emission estimates combined with appropriate default data for a variety of land-use projects that can be used if site-specific information is not available. CalEEMod Version 2022.1 was used to estimate construction and operational emissions of pollutants from the proposed project. The primary input data used to estimate emissions associated with construction of the project were provided by the District and contain information on construction duration, import and export volumes, construction-related vehicle trips, trip lengths, and off-road construction equipment inventory and usage. Construction information provided by the District and a copy of the CalEEMod report for each Alternative of the proposed project, which summarize the input parameters, assumptions, and findings, are included in Appendix C.

To analyze daily emission rates, the total emissions estimated during construction were averaged over a total of 368 working days for Alternative A and B, and a total of 586 working days for Alternative C through E. As shown in Table 7, the project’s estimated emissions for ROG, NOx, PM10, and PM 2.5 during construction are below the thresholds of significance and therefore, would not result in a cumulatively considerable net increase in criteria air pollutants for which the region is in nonattainment.

Table 7. Estimated Construction Emissions (Pounds per Day)

CONSTRUCTION EMISSIONS	ROG	NO _x	EXHAUST PM10	EXHAUST PM2.5
Alternative A	1.7	1.6	0.1	0.1
Alternative B	1.7	2.0	0.1	0.1
Alternative C	2.5	2.2	0.1	0.1
Alternative D	1.4	2.0	0.1	0.1
Alternative E	1.4	1.9	0.1	0.1
BAAQMD CEQA Thresholds of Significance	54	54	82	54
Threshold Exceedance?	No	No	No	No

Source: CalEEMod Report, Appendix C

In this analysis, it was assumed that a 1,000-kilowatt emergency diesel generator would be required for each site under each Alternative, and the generator would be used for non-emergency operation up to 50 hours per year for routine testing and maintenance. The estimated maximum annual emissions and average daily emissions during the operational phase of the proposed project are compared to the BAAQMD’s thresholds of significance in Table 8. As shown in Table 8, the project’s estimated emissions for ROG, NO_x, PM10, and PM2.5 during operation are below the thresholds of significance and therefore, would not result in a cumulatively considerable net increase in criteria air pollutants for which the region is in nonattainment.

Table 8. Estimated Operation Emissions

EMISSIONS SCENARIO	MAXIMUM ANNUAL EMISSIONS (TONS)				AVERAGE DAILY EMISSIONS (POUNDS)			
	ROG	NO _x	PM10	PM2.5	ROG	NO _x	PM10	PM2.5
Alternative A and Alternative B – One Generator	0.06	0.25	0.01	0.01	0.30	1.35	0.04	0.04
Alternative C through Alternative E – Two Generators (one at each site)	0.11	0.49	0.02	0.02	0.60	2.70	0.09	0.09
BAAQMD CEQA Thresholds of Significance	10	10	15	10	54	54	82	54
Threshold Exceedance?	No	No	No	No	No	No	No	No

Source: CalEEMod Report, Appendix C

The generation of fugitive dust PM10 and PM2.5 emissions from soil disturbance activities could result in a cumulatively considerable net increase in regional PM10 and PM2.5 concentrations. The BAAQMD does not have a quantitative threshold of significance for fugitive dust PM10 and PM2.5 emissions; however, the BAAQMD considers implementation of dust control measures during construction sufficient to reduce air quality impacts from fugitive dust to a less-than-significant level. The project would implement Mitigation Measure AQ-1, which contains Basic Best Management Practices (BMPs) from the BAAQMD’s CEQA Guidelines. Implementation of

Mitigation Measure AQ-1 would ensure that project construction activities would not result in a cumulatively considerable net increase in criteria air pollutants for which the region is in nonattainment. The impact would be less than significant with mitigation incorporated.

c) Expose sensitive receptors to substantial pollutant concentrations?

During construction, the project would generate emissions of DPM and PM_{2.5} from the exhaust of diesel-powered engines, which can penetrate deeply into the lungs and contribute to a range of health problems. In 1998, the CARB identified DPM from diesel-powered engines as a TAC based on its potential to cause cancer and other adverse health effects. For risk-assessment purposes, TACs are separated into carcinogens and non-carcinogens. Carcinogens are assumed to have no safe threshold below which health impacts would not occur, and cancer risk is expressed as excess cancer cases per 1 million exposed individuals over a lifetime of exposure. Non-carcinogenic substances are generally assumed to have a safe threshold below which health impacts would not occur. Acute and chronic exposure to non-carcinogens is expressed as a hazard index (HI), which is the sum of expected exposure levels divided by the corresponding acceptable exposure levels.

An Air Quality Health Risk Assessment (HRA) was prepared for the project by Baseline Environmental Consulting in January 2024 (included in Appendix C). The purpose of the HRA was to evaluate potential health risk impacts to nearby sensitive receptors associated with DPM emissions during project construction and operation. The health risks to nearby sensitive receptors were evaluated in accordance with guidance from the Office of Environmental Health Hazard Assessment (OEHHA) and the BAAQMD’s recommended thresholds of significance. The BAAQMD’s recommended health risk thresholds are summarized in Table 9.

Table 9. BAAQMD Health Risk Screening Threshold

IMPACT ANALYSIS	POLLUTANT	SCREENING THRESHOLDS
Local Community Risks and Hazards (Operation and/or Construction)	PM _{2.5} (project)	0.3 µg/m ³ (annual average)
	TACs (project)	Cancer risk increase > 10 in one million Chronic hazard index > 1.0
	PM _{2.5} (cumulative)	0.8 µg/m ³ (annual average)
	TACs (cumulative)	Cancer risk > 100 in one million Chronic hazard index > 10.0

Notes: µg/m³ = micrograms per cubic meter.
Source: BAAQMD 2023.

Exposure to DPM Emissions During Construction

As mentioned above, CalEEMod was used to estimate air pollutant emissions from project construction. The primary input data used to estimate emissions associated with construction of the project were provided by the District and contain information on construction duration, import and export volumes, construction-related vehicle trips, trip lengths, and off-road construction equipment inventory and usage. Construction information provided by the District and a copy of the CalEEMod report for each Alternative are included in Appendix C. For this analysis, emissions of exhaust PM₁₀ were used as a surrogate for DPM, which is a conservative

assumption because more than 90 percent of DPM is less than 1 micron in diameter.⁶ The total DPM emissions from construction activities at the five alternative site locations are presented in Table 10.

Table 10. On-site DPM Emissions (Pounds)

CONSTRUCTION EMISSION SCENARIO	TOTAL ON-SITE DPM EMISSIONS FROM OFFROAD CONSTRUCTION EQUIPMENT
Sunset Parkway Site (Alternative A)	21.8
Ignacio Boulevard Site (Alternative B)	19.4
Bolling Drive Site (Alternative C, excluding Site 2 emissions)	18.7
Main Gate Road Site (Alternative D, excluding Site 2 emissions)	15.8
C Street Site (Alternative E, excluding Site 2 emissions)	15.6

Notes: DPM emissions from existing pump station demolition were included for Site 1 but not for Site 2 to 5 due to the distances between the existing pump station and Site 2 to 5. DPM emissions from Site 3 to 5 were estimated by subtracting the total on-site offroad construction equipment DPM emissions estimated for Alternative B (Site 2 only) from the total on-site offroad construction equipment DPM emissions estimated for Alternative C through E.

Source: Appendix C.

The annual average concentrations of DPM and exhaust PM_{2.5} during construction were estimated within 1,000 feet of the project using the federal EPA’s Industrial Source Complex Term air dispersion model. Daily emissions from construction were assumed to primarily occur between 7 a.m. and 6 p.m. Monday through Friday, and between 10 a.m. and 5 p.m. on Saturdays, in accordance with the construction hours established in the City of Novato Municipal Code Division 19.22.070. Exhaust and fugitive dust emission rates for off-road equipment were based on the actual hours of work and averaged over the entire duration of construction.

The air dispersion model was used to estimate annual average concentrations of PM₁₀ and PM_{2.5} from project construction emissions for Alternative A. For the purposes of the HRA, Alternative A was assumed to be the worst-case scenario due to the location of the Sunset Parkway Site and Existing PS Site in close proximity to sensitive receptors, such as residences and schools. In addition, the sites are within the same vicinity, and therefore emissions from demolition of the existing PS as well as emissions from construction of the new PS would be occurring in the same area, which is not the case under Alternatives B through E as the new PS Site is not near the Existing PS Site. Estimates of the health risks at the maximally exposed individual resident (MEIR) and the maximally exposed individual student (MEIS) from exposure to DPM and PM_{2.5} concentrations during project construction are summarized and compared to the BAAQMD’s thresholds of significance in Table 11. The estimated excess cancer risk and chronic HI for DPM and annual average PM_{2.5} concentrations from construction emissions under Alternative A were below the thresholds of significance. Therefore, construction of the project

⁶ California Air Resources Board (CARB), 2016. Overview: Diesel Exhaust and Health. Available at: <https://www.arb.ca.gov/research/diesel/diesel-health.htm>, accessed January 13, 2017. Last updated April 12, 2016.

would not expose existing sensitive receptors to substantial concentrations of TACs and PM2.5 from construction of Alternative A (the worst-case scenario) and the impact would be less than significant for Alternatives A through E.

Table 11. Health Risks during Project Construction for Alternative A (Worse Case Scenario)

EMISSIONS SCENARIO	RECEPTOR	DIESEL PARTICULATE MATTER		PM _{2.5} ANNUAL AVERAGE CONCENTRATION (µG/M ³)
		CANCER RISK (PER MILLION)	CHRONIC HAZARD INDEX	
Construction Exhaust (Sunset Parkway Site)	MEIR	9.39	0.01	0.04
	MEIS	0.75	<0.01	0.01
Thresholds of Significance		10	1.0	0.3
Exceed Threshold?		No	No	No

Notes: µg/m³ = micrograms per cubic meter
 Source: Appendix C

As shown in Table 11, the estimated excess cancer risk and chronic HI for DPM and annual average PM2.5 concentrations from construction emissions under Alternative A were below the thresholds of significance. Therefore, construction of the project would not expose existing sensitive receptors to substantial concentrations of TACs and PM2.5 from construction of Alternative A (the worst-case scenario) and the impact would be less than significant for Alternatives A through E.

Exposure to DPM Emissions During Operation

For the purposes of the HRA analysis, it was assumed that a 1,000-kilowatt emergency diesel generator would be required at each new PS site, and the generator would be used for non-emergency operation up to 50 hours per year for routine testing and maintenance. Operation of stationary sources is subject to BAAQMD permitting requirements to minimize the potential exposure of nearby sensitive receptors to TACs. In accordance with BAAQMD’s Regulation 2-5, New Source Review of Toxic Air Contaminants, the BAAQMD does not issue permits for generators that would result in an excess cancer risk greater than 10 in 1 million or a chronic HI greater than 1.0. Therefore, operation of the project would not expose existing sensitive receptors to substantial concentrations of TACs and PM2.5 for Alternatives A through E.

Cumulative Toxic Air Contaminant Emissions

In addition to a project’s individual TAC emissions during construction and operation, the potential cumulative health risks to sensitive receptors from existing TACs were evaluated. Cumulative health risks were estimated at the MEIR for Alternative A to represent the worst-case-exposure scenario for sensitive receptors in the project vicinity.

Conservatively estimating the project’s emergency generators would result in the BAAQMD’s maximum permissible excess cancer risk of 10 in 1 million due to the emission of DPM, the BAAQMD Health Risk Calculator was used to back-calculate the equivalent screening level health risk values for chronic HI and annual average PM2.5 concentrations. Based on the emission rate for DPM (0.0071 pounds per day), that would result in a maximum cancer risk of 10 in 1 million, the associated fraction of PM2.5 emissions from an emergency generator were estimated using CARB’s specification profiles. The supporting health risk calculations are included in Appendix C.

There are no existing stationary sources within 1,000 feet of the MEIR, and there are no reasonably foreseeable future projects within 1,000 feet of the Sunset Parkway Site and Existing

PS Site that would introduce a new source of TAC and/or PM2.5 emissions. Estimates of the cumulative health risks at the MEIR for the project are summarized and compared to cumulative thresholds of significance in Table 12.

Table 12. Cumulative Health Risks for Alternative A (Worse-Case Scenario)

SOURCE	SOURCE TYPE	REF	DIESEL PARTICULATE MATTER		PM _{2.5} ANNUAL AVERAGE CONCENTRATION (µG/M ³)
			CANCER RISK (PER MILLION)	CHRONIC HAZARD INDEX	
Project					
Off-Road Construction Equipment	Diesel Exhaust		9.39	0.01	0.04
Emergency Generator	Diesel Generator	1	9.99	<0.01	0.01
Existing Mobile Sources					
Roadway	Mobile	2	9.5	0.03	0.2
Cumulative Health Risks			28.9	<0.1	0.3
Thresholds of Significance			100	10.0	0.8
Exceed Threshold?			No	No	No

Notes: µg/m³=micrograms per cubic meter; HI=hazard index; NA=not applicable; Ref=reference
 Health risk screening values derived using the following BAAQMD tools and methodologies:
 1) BAAQMD's Health Risk Calculator (Beta Version 5.0)
 2) BAAQMD Beta version Mobile Source Screening Map, 2023
 Source: Appendix C

As shown in Table 12, cumulative cancer risk, cumulative chronic HI, and annual average PM2.5 at the MEIR location were below the BAAQMD's cumulative thresholds for Alternative A (the worst-case scenario). Therefore, the exposure of existing sensitive receptors to substantial concentrations of TACs and PM2.5 from implementation of the project would not be cumulatively considerable and the impact would be less than significant for Alternatives A through E.

d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Alternative A through Alternative E – Less than Significant Impact

Some odors would be generated during project construction due to the use of gasoline- and/or diesel-powered construction equipment that emit exhaust fumes. These activities would take place intermittently throughout the workday and the associated odors would dissipate within the immediate vicinity of the work area. Persons near the construction work area may find these odors objectionable; however, the project would not include uses that have been identified as potential sources of objectionable odors, such as restaurants, manufacturing plants, landfills, and agricultural and industrial operations.

Water PS are not typically associated with objectionable odors; therefore, no odor impacts associated with the new PS would occur during project operation. The impact would be less than

significant.

MITIGATION MEASURES

Mitigation Measure AQ-1: Fugitive Dust Control Measures

The project shall implement BMPs as recommended by the BAAQMD 2022 CEQA Air Quality Guidelines, which include the following measures:

- All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day.
- All haul trucks transporting soil, sand, or other loose material off-site shall be covered.
- All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.
- All vehicle speeds on unpaved roads shall be limited to 15 mph.
- All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.
- Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations). Clear signage shall be provided for construction workers at all access points.
- All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation.

CONCLUSION

Under Alternatives A through E, the impact of the proposed project related to air quality would be reduced to a less than significant level with the implementation of mitigation measures. None of the Alternatives would conflict with the BAAQMD 2017 CAP, and therefore, the impact related to confliction with a local plan or policy addressing air quality would be the same under each Alternative. Alternative C would have the most substantial impact related to construction emissions, and Alternatives C, D, and E would have the most substantial impact related to operational emissions from the emergency diesel generators. Under each Alternative, construction activities would generate fugitive dust emissions (PM_{2.5} and PM₁₀), which would be reduced to a less than significant level with the implementation of Mitigation Measure AQ-1, which includes standard construction BMPs recommended by the BAAQMD. Alternative A would have the most substantial impact related to TAC and DPM emissions during construction because the construction and demolition activities would be occurring at the Sunset Parkway Site and Existing PS Site, which are in close proximity to one another. However, the HRA found that none of the Alternatives would have a potentially significant impact related to exposing sensitive populations to substantial pollution concentrations, and that no mitigation measures are required. Under Alternatives A through E, the project would not result in other emissions (such as those leading to odors) that would affect a substantial number of people; the impact would be the same under each Alternative.



4.2.4 Biological Resources

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	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 Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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 Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

On March 29 and December 13, 2023, WRA, Inc. (WRA) biologists visited the project sites to map vegetation, unvegetated land cover types, document plant and wildlife species presence, and evaluate habitat for the potential to support special-status species as defined by CEQA. The research and survey methodology and results of these surveys are summarized in the following

sections. Information in this section relies on the Biological Resources Technical Report (BRTR, Appendix D) prepared by WRA biologists in January 2024. WRA also prepared an Arborist Report for the proposed project in January 2024, which is included as Appendix E.

REGULATORY SETTING – FEDERAL AND STATE

Endangered and Threatened Plants, Fish, and Wildlife

Specific species of plants, fish and wildlife may be designated as threatened or endangered by the federal Endangered Species Act (ESA), or the California Endangered Species Act (CESA). Specific protections and permitting mechanisms for these species differ under each of these acts, and a species' designation under one law does not automatically provide protection under the other.

The ESA (16 USC 1531 et seq.) is implemented by the United States Fish and Wildlife Service (USFWS) and the National Marine Fisheries Service (NMFS). The USFWS and NMFS maintain lists of "endangered" and "threatened" plant and animal species (referred to as "listed species"). "Proposed" or "candidate" species are those that are being considered for listing and are not protected until they are formally listed as threatened or endangered. Under the ESA, authorization must be obtained from the USFWS or NMFS prior to "take" of any listed species. "Take" under the ESA is defined as "harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct." Take under the ESA includes direct injury or mortality to individuals, disruptions in normal behavioral patterns resulting from factors such as noise and visual disturbance and impacts to habitat for listed species. Actions that may result in "take" of an ESA-listed species may obtain a permit under ESA Section 10, or via the interagency consultation described in ESA Section 7. Federally listed plant species are only protected when take occurs on federal land; however, if a federal agency authorizes, funds, or carries out an action, that agency must insure through Section 7 consultation that the action is not likely to jeopardize the continued existence of the species.

The ESA also provides for designation of critical habitat, which are specific geographic areas containing physical or biological features "essential to the conservation of the species." Protections afforded to designated critical habitat apply only to actions that are funded, permitted, or carried out by federal agencies. Critical habitat designations do not affect activities by private landowners if there is no other federal agency involvement.

The CESA (California Fish and Game Code [CFGC] 2050 et seq.) prohibits the "take" of any plant and animal species that the California Fish and Game Commission determines to be an endangered or threatened species in California. CESA regulations include take protection for threatened and endangered plants on private lands, as well as extending this protection to "candidate species" which are proposed for listing as threatened or endangered under CESA. The definition of a "take" under CESA ("hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill") only applies to direct impact to individuals, and does not extend to habitat impacts or harassment. The California Department of Fish and Wildlife (CDFW) may issue an Incidental Take Permit under CESA to authorize take if it is incidental to otherwise lawful activity and if specific criteria are met. Take of these species is also authorized if the geographic area is covered by a Natural Community Conservation Plan (NCCP), as long as the NCCP covers that activity. CDFW may also authorize take for voluntary restoration projects through the Restoration Management Permit.



Fully Protected Species and Designated Rare Plant Species

This category includes specific plant and wildlife species that are designated in the CFGC as protected even if not listed under CESA or the ESA. Fully Protected Species includes specific lists of birds, mammals, reptiles, amphibians, and fish designated in the CFGC. Fully protected species may not be taken or possessed at any time. No licenses or permits may be issued for the take of fully protected species, except for necessary scientific research and conservation purposes. The definition of "take" is the same under the CFGC and the CESA.

Special Protections for Nesting Birds and Bats

The federal Bald and Golden Eagle Protection Act provides relatively broad protections to both of North America's eagle species (bald [*Haliaeetus leucocephalus*] and golden eagle [*Aquila chrysaetos*]) that in some regards are similar to those provided by the ESA. In addition to regulations for special-status species, most native birds in the U.S., including non-status species, have baseline legal protections under the Migratory Bird Treaty Act of 1918 (MBTA) and CFGC, i.e., Sections 3503, 3503.5 and 3513. Under these laws/codes, the harm or collection of adult birds as well as the collection or destruction of active nests, eggs, and young is illegal. For bat species, the Western Bat Working Group designates conservation status for species of bats, and those with a high or medium-high priority are typically given special consideration under CEQA (Western Bat Working Group 2021).

Species of Special Concern, Movement Corridors, and Other Special-status Species under CEQA

A Species of Special Concern is a species formally designated by CDFW which meet one or more criteria related to federal ESA status (if it is not listed under CESA), extirpation from California, documented population declines, or small population size within California and risk of declines. Section 15280 of the CEQA Guidelines state that species of special concern must be included in project impact analyses. In addition, CDFW has developed a special animals list as "a general term that refers to all of the taxa the California Natural Diversity Database (CNDDDB) is interested in tracking, regardless of their legal or protection status." This list includes lists developed by other organizations, including for example, the Audubon Watch List Species, the Bureau of Land Management Sensitive Species, and USFWS Birds of Special Concern. Plant species on the California Native Plant Society (CNPS) Rare Plant Inventory (Inventory) (CNPS 2023) with California Rare Plant Ranks (Rank) of 1 and 2, as well as some with a Rank of 3 or 4, are also considered special-status plant species and must be considered under CEQA. Some Rank 3 and Rank 4 species are typically only afforded protection under CEQA when such species are particularly unique to the locale (e.g., range limit, low abundance/low frequency, limited habitat) or are otherwise considered locally rare. Additionally, any species listed as sensitive within local plans, policies and ordinances are likewise considered sensitive. Movement and migratory corridors for native wildlife (including aquatic corridors) as well as wildlife nursery sites are given special consideration under CEQA.

REGULATORY SETTING – LOCAL

City of Novato Tree Ordinance (Private Property)

The City of Novato Tree Ordinance defines a "tree" on private property as any native or non-native woody plant having a major trunk or trunk of a diameter of 6 inches or greater measured at 24 inches above grade, and a "heritage tree" is defined as any tree having a diameter of 24 inches or greater, measured at 24 inches above grade (Ord. No. 1576, § 2, 10-23-12). The alteration or removal of a heritage tree on any parcel or of one or more tree on an undeveloped

parcel is prohibited without a permit from the City of Novato (Ord. No. 1441 § 2(E); Ord. No. 1576, § 2, 10-23-2012). The District is exempt from the City of Novato local ordinances with the exception of an Encroachment Permit.

City of Novato Tree Ordinance (Public Places)

The City of Novato Tree Ordinance defines a “tree” on or adjacent to public places as any woody perennial plant having a single main axis or stem commonly achieving ten feet in height and capable of shaping and pruning to develop a branch-free trunk at least nine feet in height, and a “shrub” is defined as any woody perennial plant having a single main axis or stem commonly achieving ten feet in height and capable of shaping and pruning to develop a branch-free trunk at least nine feet in height, and a “shrub” is defined as any woody perennial plant, normally low, several stemmed, adaptable to shaping, trimming and pruning without injury within the area planted (Ord. No. 1576, § 2, 10-23-12). The trimming, alteration, or removal of and street tree or shrub is prohibited without approval from the City of Novato (Ord. No. 1441 § 2(E); Ord. No. 1576, § 2(E), 10-23-2012). The District is exempt from the City of Novato local ordinances with the exception of an Encroachment Permit.

City of Novato Wetland Protection and Restoration

The City of Novato municipal code stipulates that any development shall be designed and constructed to avoid wetlands to the maximum extent feasible (Ord. No. 1576, § 2, 10-23-2012). Wetlands are defined as waters delineated by the United States Army Corps of Engineers (Corps) under the provisions of the Clean Water Act. Permit approval is required for any project within 50 feet of a wetland, requiring wetland protection measures, involving wetland/encroachment, or requiring wetland mitigation; and, for all wetland protection, restoration, enhancement, and/or mitigation projects (Ord. No. 1576, § 2, 10-23-2012). The District is exempt from the City of Novato local ordinances with the exception of an Encroachment Permit.

City of Novato Waterways and Riparian Protection

The City of Novato municipal code stipulates that all lands adjoining or encompassing watercourses and their significant tributaries shall be subject to a Stream Protection Zone (Ord. No. 1576, § 2, 10-23-2012). These lands are shown on “ES- 1” within the General Plan. A Stream Protection Zone includes the streambed, stream banks, all riparian vegetation, and an upland buffer at least 50 feet wide measured from top of the channel bank. Proposed development, land uses and activities including any proposed development application, land division, use permit, grading or building permit for any excavation, fill, grading, or paving; removal or planting of vegetation; construction, alteration, or removal of any structure; or alteration of any embankment within the Stream Protection Zone requires Use Permit approval (Ord. No. 1576, § 2, 10-23-2012). The District is exempt from the City of Novato local ordinances with the exception of an Encroachment Permit.

METHODOLOGY

On March 29 and December 13, 2023, WRA biologists visited the project sites to map vegetation, aquatic features, and other land cover types; document plant and wildlife species present; and evaluate on-site habitat for the potential to support special-status species as defined by CEQA. Prior to the site visit, WRA biologists reviewed literature resources and performed database searches to assess the potential for sensitive land cover types and special-status species, including:

- Contemporary aerial photographs (Google Earth 2024)
- Historical aerial photographs (NETR 2024)
- National Wetlands Inventory (USFWS 2024a)
- California Aquatic Resources Inventory (SFEI 2024)
- CNDDDB (CDFW 2024b)
- CNPS Inventory (CNPS 2024)
- Consortium of California Herbaria (CCH1 2024, CCH2 2024)
- USFWS Information for Planning and Consultation (USFWS 2024b)
- eBird Online Database (Cornell Lab of Ornithology 2024)
- California Bird Species of Special Concern in California (Shuford and Gardali 2008)
- California Amphibian and Reptile Species of Special Concern (Thomson et al. 2016)
- A Field Guide to Western Reptiles and Amphibians (Stebbins 2003)
- A Manual of California Vegetation, Online Edition (CNPS 2024)
- California Natural Community List (CDFW 2024a)
- Database searches (i.e., CNDDDB, CNPS) for special-status species focused on the Novato and eight surrounding USGS 7.5-minute quadrangles.

Following the remote assessment, WRA biologists completed a field review over the course of two days to document: (1) land cover types (e.g., vegetation communities, aquatic resources), (2) existing conditions and to determine if such provide suitable habitat for any special-status plant or wildlife species, (3) if and what type of aquatic land cover types (e.g., wetlands) are present, and (4) if special-status species are present.

Special-status Species

Potential occurrence of special-status species in the project site areas was evaluated by first determining which special-status species occur in the vicinity of the project site through a literature and database review as described above. Presence of suitable habitat for special-status species was evaluated during the site visits based on physical and biological conditions in the project site area as well as the professional expertise of the investigating biologists. The potential for each special-status species to occur in the project site area was then determined according to the following criteria:

- **No Potential.** Habitat on and adjacent to the Study Area is clearly unsuitable for the species requirements (foraging, breeding, cover, substrate, elevation, hydrology, plant community, site history, disturbance regime).
- **Unlikely.** Few of the habitat components meeting the species requirements are present, and/or the majority of habitat on and adjacent to the Study Area is unsuitable or of very poor quality. The species is not likely to be found in the Study Area.
- **Moderate Potential.** Some of the habitat components meeting the species requirements are present, and/or only some of the habitat on or adjacent to the Study



Area is unsuitable. The species has a moderate probability of being found in the Study Area.

- **High Potential.** All of the habitat components meeting the species requirements are present and/or most of the habitat on or adjacent to the Study Area is highly suitable. The species has a high probability of being found in the Study Area.
- **Present.** Species is observed on the site or has been recorded (i.e., CNDDDB, other reports) in the Study Area in the recent past.

Wildlife Corridors and Native Wildlife Nursery Sites

To account for potential impacts to wildlife movement and migratory corridors, biologists reviewed maps from the California Essential Connectivity Project (CalTrans 2010), and habitat connectivity data available through the CDFW Biogeographic Information and Observation System (CDFW 2024). Additionally, aerial imagery (Google Earth 2024) for the local area was referenced to assess if local core habitat areas were present within, or connected to the project sites. This assessment was refined based on observations of on-site physical and/or biological conditions, including topographic and vegetative factors that can facilitate wildlife movement, as well as on-site and off-site barriers to connectivity. Examples of native wildlife nursery sites include nesting sites for native bird species (particularly colonial nesting sites), marine mammal pupping sites, and colonial roosting sites for other species (such as for monarch butterfly [*Danaus plexippus*]).

ENVIRONMENTAL SETTING

The project sites are located in the inland region of Marin County. The average monthly maximum temperature in the area is 70 degrees Fahrenheit, while the average monthly minimum temperature is 48 degrees Fahrenheit. Predominantly, precipitation falls as rainfall between November and March with an annual average precipitation of 36 inches.

The local watershed is Miller Creek-Frontal San Pablo Bay Estuaries and the regional watershed is San Pablo Bay. The project sites are located in the western portion of the San Pablo Bay watershed.

Sunset Parkway Site (Site 1)

The Sunset Parkway Site and staging area on Sunset Parkway are characterized by developed/landscaped land cover.

Ignacio Boulevard Site (Site 2)

The Ignacio Boulevard Site and staging area are characterized by developed/landscaped land cover. The Ignacio Boulevard Site is situated within 50 feet of riparian vegetation associated with Arroyo San Jose Creek.

Bolling Drive Site (Site 3)

The Bolling Drive Site and staging areas are characterized by developed/landscaped land cover.

Main Gate Road site (Site 4)

The Main Gate Road Site is characterized by developed/landscaped land cover, while the staging area is characterized by ruderal herbaceous land cover. The Main Gate Road Site is situated within 50 feet of riparian vegetation associated with Pacheco Creek.

C Street Site (Site 5)

The C Street Site and staging area are characterized by developed/landscaped land cover.

Existing PS Site

The Existing PS Site and staging area on Sunset Parkway are characterized by developed/landscaped land cover.

DISCUSSION OF IMPACTS

- 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 (CDFW) or United States Fish and Wildlife Service (USFWS)?*

Alternative A through Alternative E – Less than Significant Impact with Mitigation Incorporated

Special-status Plant Species

Based upon a review of the resource databases listed in the Methodology Section above, 105 special-status plant species have been documented in the vicinity of the project sites. None of these species were determined to have the potential to occur or are unlikely to occur within the project sites due to one or more of the following:

- The project sites do not contain the necessary hydrologic, edaphic (soil), topographic, and pH conditions necessary to support the special-status species.
- Associated natural communities necessary to support the special-status species are not present within the project sites.
- The project sites are geographically isolated from the documented range of the special-status plant species.
- The historical landscape and/or habitat(s) of the project sites were not suitable habitat prior to land/type conversion to support the special-status plant species.
- Land use history and contemporary management has degraded the localized habitat necessary to support the special-status plant species.

WRA biologists did not observe any special-status plant species during the March 29 and December 13, 2023 site visits. Because no special-status plant species were observed on the project sites, and special-status plant species have no potential to occur or are unlikely to occur on the project site, the proposed project under Alternatives A through E would have no impact on special-status plant species.

Special-status Wildlife Species

Based upon a review of the resource databases listed in the Methodology Section above, no special-status wildlife species have been documented on or adjacent to the project sites; however, 54 special-status wildlife species have been documented in the general vicinity of the project sites. The BRTR concluded that, of the 54 special-status species, all are considered unlikely, or have no potential, to occur within the project sites based on a lack of suitable habitat features.

Features not found within the project sites that are required to support special-status wildlife species include:



- Vernal pools,
- Perennial aquatic habitat (e.g., streams, rivers, or ponds),
- Tidal marsh areas,
- Old growth redwood or fir forest,
- Open grassland,
- Sandy beaches or alkaline flats,
- Presence of specific host plants, and
- Caves, mine shafts, or abandoned buildings.

The absence of such habitat features eliminates components critical to the survival or movement of special-status species found in the vicinity. Given the project sites' relative proximity to sensitive habitats on the San Francisco Bay, many species documented nearby are additionally obligates to marine or tidal marsh habitats which are not present on or in the immediate vicinity of the project sites.

Although special-status bird species are unlikely to nest within the project sites, common birds protected under the MBTA and CFGC may nest within trees or on the ground within the project sites. Project construction activities, such as grading and other earth-disturbing activities, could impact nesting birds or their eggs, which is considered a potentially significant impact. The project would implement Mitigation Measure BIO-1 to reduce impacts to nesting bird species to a less-than-significant level. With implementation of Mitigation Measure BIO-1, the proposed project under Alternatives A through E would not have a substantial adverse effect on any candidate, sensitive, or special-status species. The impact would be less than significant with mitigation incorporated.

b) *Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the CDFW or USFWS?*

Alternative A – No Impact

The Sunset Parkway Site, Existing PS Site, and staging area on Sunset Parkway are entirely covered by developed/landscaped land cover. No sensitive natural communities are present on the project sites or staging area. Therefore, no impact related to riparian habitat or other sensitive natural community would occur.

Alternative B – Less than Significant Impact

The Ignacio Boulevard Site and staging area, Existing PS Site, and staging area on Sunset Parkway are entirely covered by developed/landscaped land cover. No sensitive natural communities are present on the project sites or staging area. The Ignacio Boulevard Site and staging area are located within 50 feet of riparian vegetation associated with Arroyo San Jose Creek. No impacts to riparian vegetation would occur as the staging areas are outside the dripline of riparian vegetation. The impact would be less than significant.

Alternative C – Less than Significant Impact

The Bolling Drive Site and staging areas, Ignacio Boulevard Site and staging area, Existing PS Site, and staging area on Sunset Parkway are entirely covered by developed/landscaped land cover. No sensitive natural communities are present on the project sites or staging area. The Ignacio Boulevard Site and staging area are located within 50 feet of riparian vegetation associated with Arroyo San Jose Creek. No impacts to riparian vegetation would occur as the

staging areas are outside the dripline of riparian vegetation. The impact would be less than significant.

Alternative D – Less than Significant Impact

The Main Gate Road Site, Ignacio Boulevard Site and staging area, Existing PS Site, and staging area on Sunset Parkway are entirely covered by developed/landscaped land cover. The Main Gate Road staging area is covered by ruderal herbaceous land cover, which is not considered a sensitive natural community. No sensitive natural communities are present on the project sites or staging area. The Ignacio Boulevard Site and staging area and Main Gate Road Site and staging area are located within 50 feet of riparian vegetation associated with Arroyo San Jose and Pacheco Creek, respectively. No impacts to riparian vegetation would occur as the staging areas are outside the dripline of riparian vegetation. The impact would be less than significant.

Alternative E – Less than Significant Impact

The C Street Site and staging area, Ignacio Boulevard Site and staging area, Existing PS Site, and staging area on Sunset Parkway are entirely covered by developed/landscaped land cover. No sensitive natural communities are present on the project sites or staging area. The Ignacio Boulevard Site and staging area are located within 50 feet of riparian vegetation associated with Arroyo San Jose Creek. No impacts to riparian vegetation would occur as the staging areas are outside the dripline of riparian vegetation. The impact would be less than significant.

- c) *Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?***

Alternative A – No Impact

No aquatic resources are present within the Sunset Parkway Site, Existing PS Site, or staging area on Sunset Parkway. Therefore, the project would not have a substantial adverse effect on State or federally protected wetlands through direct removal, filling, hydrological interruption, or other means. No impact would occur.

Alternative B – Less than Significant Impact

No aquatic resources are present within the Ignacio Boulevard Site or staging area, Existing PS Site, or staging area on Sunset Parkway. The Ignacio Boulevard Site is situated within 100 feet of Arroyo San Jose Creek; however, the stream would not be impacted by project activities. As such, the project would not have a substantial adverse effect on State or federally protected wetlands through direct removal, filling, hydrological interruption, or other means. The impact would be less than significant.

Alternative C – Less than Significant Impact

No aquatic resources are present within the Bolling Drive Site or staging areas, Ignacio Boulevard Site or staging areas, Existing PS Site, or staging area on Sunset Parkway. The Ignacio Boulevard Site is situated within 100 feet of Arroyo San Jose Creek; however, the stream would not be impacted by project activities. As such, the project would not have a substantial adverse effect on State or federally protected wetlands through direct removal, filling, hydrological interruption, or other means. The impact would be less than significant.

Alternative D – Less than Significant Impact

No aquatic resources are present within the Main Gate Road Site or staging area, Ignacio

Boulevard Site or staging areas, Existing PS Site, or staging area on Sunset Parkway. The Ignacio Boulevard Site and Main Gate Road Site are situated within 100 feet of Arroyo San Jose Creek and Pacheco Creek, respectively; however, the streams would not be impacted by project activities. As such, the project would not have a substantial adverse effect on State or federally protected wetlands through direct removal, filling, hydrological interruption, or other means. The impact would be less than significant.

Alternative E – Less than Significant Impact

No aquatic resources are present within the C Street Site or staging area, Ignacio Boulevard Site or staging areas, Existing PS Site, or staging area on Sunset Parkway. The Ignacio Boulevard Site is situated within 100 feet of Arroyo San Jose Creek; however, the stream would not be impacted by project activities. As such, the project would not have a substantial adverse effect on State or federally protected wetlands through direct removal, filling, hydrological interruption, or other means. The impact would be less than significant.

- 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?***

Alternative A through Alternative E – No Impact

Wildlife movement between suitable habitat areas can occur via open space areas lacking substantial barriers. As described in the “Methodology” Section above, WRA biologists reviewed maps from the California Essential Connectivity Project and habitat connectivity data available through the CDFW Biogeographic Information and Observation System, as well as aerial imagery for the local area to assess if local core habitat areas were present within or connected to the project sites. This assessment was refined based on observations of on-site physical and/or biological conditions, including topographic and vegetative factors that can facilitate wildlife movement, as well as on-site and off-site barriers to connectivity.

The BRTR concluded that none of the project sites serve as migration corridors or native wildlife nursery sites. The project would not 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. No impact would occur.

- e) *Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?***

Alternative A – Less than Significant Impact

Alternative A would likely require the removal of three Siberian elm trees located within the Sunset Parkway Site, and potential trimming of one Siberian elm located directly outside of the Sunset Parkway Site boundary. These trees are in fair to poor condition, exhibiting internal decay and scaffold branch failure. This Alternative would likely avoid four trees including one olive and one Mexican fan palm located at the Existing PS Site, and two mulberries located at the staging area on Sunset Parkway. All trees on and within the immediate vicinity of the Sunset Parkway Site, Existing PS Site, and staging area on Sunset Parkway are classified as “City trees” as defined by the City’s Tree Ordinance. The project will implement standard tree protection measures for all avoided trees as described in the Arborist Report (WRA 2023, Appendix E).

The District is not required to comply with the City of Novato Ordinances. As such, the project is not required to replace trees to be removed by project activities in accordance with the City’s

Tree Ordinance. However, the District intends to replace trees removed by the project at the recommended one to one ratio, which is consistent with the City’s Tree Ordinance. Accordingly, three replacement trees for the removal of the three Siberian elm trees on the Sunset Parkway Site would be included as part of Alternative A. The project would not conflict with any local policies or ordinances protecting biological resources. The impact would be less than significant.

Alternative B – Less than Significant Impact

There are no trees situated within the Ignacio Boulevard Site boundary or staging area, and therefore, project activities at the Ignacio Boulevard Site would not impact any trees. Alternative B would likely avoid four trees including one olive and one Mexican fan palm located at the Existing PS Site, and two mulberries located at the staging area on Sunset Parkway. All trees on and within the immediate vicinity of the Existing PS Site and staging area on Sunset Parkway are classified as “City trees” as defined by the City’s Tree Ordinance. The project will implement standard tree protection measures for all avoided trees as described in the Arborist Report (WRA 2023, Appendix E). Upland areas within 50 feet of streambanks or riparian vegetation are subject to Stream Protection Zone requirements per the City’s Waterways and Riparian Protection Ordinance. The Ignacio Boulevard Site is situated within 50 feet of riparian vegetation associated with Arroyo San Jose Creek. However, the District is not required to comply with City of Novato Ordinances. As such, there is no potential conflict with local ordinances and there is no impact due to tree removal or project activities within the Stream Protection Zone. As such, the project is not required to replace trees to be removed by project activities in accordance with the City’s Tree Ordinance, or implement requirements of the City’s Waterways and Riparian Protection Ordinance. The impact would be less than significant.

Alternative C – Less than Significant Impact

Alternative C would likely require the removal of three planted valley oak trees located within the Bolling Drive Site boundary, and potential trimming of one Crepe myrtle located directly outside the Bolling Drive Site boundary. The three valley oak trees likely to require removal are relatively small trees in good condition. There are no trees situated within the Ignacio Boulevard Site boundary or staging area, and therefore project activities at the Ignacio Boulevard Site would not impact any trees. Alternative C would likely avoid four trees including one olive and one Mexican fan palm located at the Existing PS Site, and two mulberries located at the staging area on Sunset Parkway. All trees on and within the immediate vicinity of the Bolling Drive Site, Existing PS Site, and staging area on Sunset Parkway are classified as “City trees” as defined by the City’s Tree Ordinance. The project will implement standard tree protection measures for all avoided trees as described in the Arborist Report (WRA 2023, Appendix E).

The District is not required to comply with the City of Novato Ordinances. As such, the project is not required to replace trees to be removed by project activities in accordance with the City’s Tree Ordinance. However, the District intends to replace trees removed by the project at the recommended one to one ratio, which is consistent with the City’s Tree Ordinance. Accordingly, three replacement trees for the removal of the three valley oak trees on the Bolling Drive Site would be included as part of Alternative C.

Upland areas within 50 feet of streambanks or riparian vegetation are subject to Stream Protection Zone requirements per the City’s Waterways and Riparian Protection Ordinance. The Ignacio Boulevard Site is situated within 50 feet of riparian vegetation associated with Arroyo San Jose Creek. However, the District is not required to comply with City of Novato Ordinances. As such, there is no potential conflict with local ordinances and there is no impact due to tree removal or project activities within the Stream Protection Zone. As such, the project is not

required to replace trees to be removed by project activities in accordance with the City's Tree Ordinance or implement requirements of the City's Waterways and Riparian Protection Ordinance. The project would not conflict with any local policies or ordinances protecting biological resources. The impact would be less than significant.

Alternative D – Less than Significant Impact

Alternative D would likely require the removal of six City trees including four California sycamores, one London plane tree, and one glossy privet on the Main Gate Road Site. There are no trees situated within the Ignacio Boulevard Site boundary or staging area, and therefore project activities at the Ignacio Boulevard Site would not impact any trees. Alternative D would likely avoid four trees including one olive and one Mexican fan palm located at the Existing PS Site, and two mulberries located at the staging area on Sunset Parkway. All trees on and within the immediate vicinity of the Main Gate Road Site, Existing PS Site, and staging area on Sunset Parkway are classified as "City trees" as defined by the City's Tree Ordinance. The project will implement standard tree protection measures for all avoided trees as described in the Arborist Report (WRA 2023, Appendix E).

The District is not required to comply with the City of Novato Ordinances. As such, the project is not required to replace trees to be removed by project activities in accordance with the City's Tree Ordinance. However, the District intends to replace trees removed by the project at the recommended one to one ratio, which is consistent with the City's Tree Ordinance. Accordingly, six replacement trees for the removal of the four California sycamore trees, London plane tree, and glossy privet tree on the Main Gate Road Site would be included as part of Alternative D.

Upland areas within 50 feet of streambanks or riparian vegetation are subject to Stream Protection Zone requirements per the City's Waterways and Riparian Protection Ordinance. The Ignacio Boulevard Site and Main Gate Road Site are situated within 50 feet of riparian vegetation associated with Arroyo San Jose Creek and Pacheco Creek, respectively. However, the District is not required to comply with City of Novato Ordinances. As such, there is no potential conflict with local ordinances and there is no impact due to tree removal or project activities within the Stream Protection Zone. As such, the project is not required to replace trees to be removed by project activities in accordance with the City's Tree Ordinance or implement requirements of the City's Waterways and Riparian Protection Ordinance. The project would not conflict with any local policies or ordinances protecting biological resources. The impact would be less than significant.

Alternative E – Less than Significant Impact

Alternative E would likely require the removal of one protected-size Chinese elm and one non-protected Chinese elm within the C Street Site. Two additional Chinese elm trees would likely be avoided as they are located on the edge of the C Street Site staging area. There are no trees situated within the Ignacio Boulevard Site boundary or staging area, and therefore project activities at the Ignacio Boulevard Site would not impact any trees. Alternative E would likely avoid four trees including one olive and one Mexican fan palm located at the Existing PS Site, and two mulberries located at the staging area on Sunset Parkway. All trees on and within the immediate vicinity of the Existing PS Site, and staging area on Sunset Parkway are classified as "City trees" as defined by the City's Tree Ordinance. The project will implement standard tree protection measures for all avoided trees as described in the Arborist Report (WRA 2023).



The District is not required to comply with the City of Novato Ordinances. As such, the project is not required to replace trees to be removed by project activities in accordance with the City's Tree Ordinance. However, the District intends to replace trees removed by the project at the recommended one to one ratio, which is consistent with the City's Tree Ordinance. Accordingly, one replacement tree for the removal of the protected-size Chinese elm tree on the C Street Site would be included as part of Alternative E.

Upland areas within 50 feet of streambanks or riparian vegetation are subject to Stream Protection Zone requirements per the City's Waterways and Riparian Protection Ordinance. The Ignacio Boulevard Site is situated within 50 feet of riparian vegetation associated with Arroyo San Jose Creek. However, the District is not required to comply with City of Novato Ordinances. As such, there is no potential conflict with local ordinances and there is no impact due to tree removal or project activities within the Stream Protection Zone. As such, the project is not required to replace trees to be removed by project activities in accordance with the City's Tree Ordinance or implement requirements of the City's Waterways and Riparian Protection Ordinance. The project would not conflict with any local policies or ordinances protecting biological resources. The impact would be less than significant.

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?*

Alternative A through Alternative E – No Impact

The project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan. No such plan exists applicable to the project sites. No impact would occur.

MITIGATION MEASURES

Mitigation Measure BIO-1: Nesting Birds

If project activities must be conducted during the nesting season (February 15 through September 1), a pre-construction nesting bird survey will be conducted by a qualified biologist no more than seven days prior to vegetation removal or initial ground disturbance. The survey will include the project site and within a minimum 500 feet of all project areas to identify the location and status of any nests that could potentially be affected either directly or indirectly by project activities.

If active nests of native nesting bird species are located during the preconstruction nesting bird survey, a work exclusion zone will be established around each nest by the qualified biologist. Established exclusion zones will remain in place until all young in the nest have fledged or the nest otherwise becomes inactive (e.g., due to predation). Suggested buffer zone distances differ depending on species, location, baseline conditions, and placement of nest and shall be determined in the field by a qualified biologist.

CONCLUSION

Under Alternatives A through E, impacts related to special-status species, migratory wildlife corridors, local policies and ordinances protecting biological resources, and adopted Habitat Conservation Plans and Natural Community Conservation Plans would be similar. The Ignacio Boulevard Site and Main Gate Road Site are situated within 100 feet of Arroyo San Jose Creek

and Pacheco Creek, respectively, and therefore, project activities at either of these sites could result in a slightly more substantial impact to sensitive natural communities, including riparian vegetation and, and protected waterways. As such, Alternatives B, C, and E, would have a slightly more substantial impact to biological resources than Alternative A due to project activities at the Ignacio Boulevard Site, and Alternative D would have the most substantial impact due to project activities taking place at both the Ignacio Boulevard Site and the Main Gate Road Site. However, although these two project sites are situated near sensitive natural communities and protected waterways, project activities would not directly or indirectly impact these resources, and therefore the impact would remain less than significant.



4.2.5 Cultural Resources

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Disturb any human remains, including those interred outside of dedicated cemeteries?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Tom Origer & Associates (Origer) prepared a Cultural Resources Study for the project in December 2023 (Barrow 2023). The study was conducted to meet the requirements of CEQA and to identify potential historical resources other than Tribal Cultural Resources, as defined in Public Resources Code 21074 (a)(1)(A)-(B), in the vicinity of the project sites. The study included archival research at the Northwest Information Center, Sonoma State University, examination of the library and files of Origer, Native American contact, and a field survey of the project sites. Information in this section is adapted from and relies on the Cultural Resources Study. The study is available for review at the District by qualified individuals only.

ENVIRONMENTAL SETTING - REGIONAL

Prehistory

The concept of prehistory refers to the period of time before events were recorded in writing and varied worldwide. Because there is no written record, the understanding of California prehistory relies on archaeological materials and oral histories passed down through generations. In the 1930s, archaeologists from Sacramento Junior College and the University of California began piecing together a sequence of cultures primarily based on burial patterns and ornamental artifact from sites in the lower Sacramento Valley (Lillard et al. 1939, Heizer and Fenenga 1939). Their cultural sequence became known as the Central California Taxonomic System, which identified three culture periods termed the Early, Middle, and Late Horizons, but without offering date ranges. Refinement of the Central California Taxonomic System became a chief concern of archaeologists as the century progressed.

It is estimated that native peoples have occupied the region for over 11,000 years, and during that time, shifts took place in their social, political, and ideological regimes (Fredrickson 1973). Early occupants appear to have had an economy based largely on hunting, with limited exchange, and social structures based on the extended family unit. Later, milling technology and an inferred acorn economy were introduced. This diversification of economy appears to be coeval with the development of sedentism and population growth and expansion. Sociopolitical complexity and status distinctions based on wealth are also observable in the archaeological

record, as evidenced by an increased range and distribution of trade goods (e.g., shell beads, obsidian tool stone), which are possible indicators of both status and increasingly complex exchange systems.

These horizons or periods are marked by a transition from large projectile points and milling slabs, indicating a focus on hunting and gathering during the Early Period, to a marine focus during the Middle Period evidenced by the number of shellmounds in the Bay Area. The Middle Period also saw more reliance on acorns and the use of bowl-shaped mortars and pestles. Acorn exploitation increased during the Late Period and the bow and arrow were introduced.

Prehistoric archaeological site indicators expected to be found in the region include but are not limited to obsidian and chert flakes and chipped stone tools; grinding and mashing implements such as slabs and hand-stones, and mortars and pestles; and locally darkened midden soils containing some of the previously listed items plus fragments of bone, shellfish, and fire-affected stones.

Ethnography

Linguists and ethnographers tracing the evolution of languages have found that most of the indigenous languages of the California region belong to one of five widespread North American language groups (the Hokan and Penutian phyla, and the Uto-Aztecan, Algic, and Athabaskan language families). The distribution and internal diversity of four of these groups suggest that their original centers of dispersal were outside, or peripheral to, the core territory of California, that is, the Central Valley, the Sierra Nevada, the Coast Range from Cape Mendocino to Point Conception, and the Southern California coast and islands. Only languages of the Hokan phylum can plausibly be traced back to populations inhabiting parts of this core region during the Archaic period, and there are hints of connections between certain branches of Hokan, such as that between Salinan and Seri, that suggest that at least some of the Hokan languages could have been brought into California by later immigrants, primarily from the Southwest and northwestern Mexico (Golla 2011).

At the time of European settlement, the project sites were included in the territory controlled by the Coast Miwok (Kelly 1978). The Coast Miwok were hunter-gatherers who lived in rich environments that allowed for dense populations with complex social structures. They settled in large, permanent villages about which were distributed seasonal camps and task specific sites. Primary village sites were occupied throughout the year, and other sites were visited in order to procure particular resources that were especially abundant or available only during certain seasons. Sites often were situated near freshwater sources and in ecotones where plant life and animal life were diverse and abundant.

It is believed that members of the Coast Miwok were the Native Americans who met with both Sir Francis Drake and Sebastian Rodriguez Cermeño during their voyages to California. After those two contacts, the Coast Miwok were left alone for nearly 200 years until the construction of the San Francisco Presidio and Mission Dolores in 1776 (Kelly 1978). Even then, Coast Miwok did not enter Mission Dolores in significant numbers until 1800 (Milliken 1995).

In 1823, the mission San Francisco Solano de Sonoma, hereafter referred to as the Sonoma Mission, was established in Sonoma. Governor Arguello was nervous about Russian explorers invading farther south and advised Father Jose Altamira to establish the mission. Approximately 500 neophytes from the missions at San Rafael, San Jose, and San Francisco were sent to the Sonoma Mission. Like at all the missions, neophytes were expected to work in the fields and around the mission building complex. Despite glowing descriptions from many of the fathers,



mission conditions were often poor. In the fall of 1826, the Sonoma Mission was raided by converted and non-converted Native Americans, and parts of it were set on fire. Father Altamira left Sonoma and the mission was abandoned until 1828 when Father Buenaventura Fortuny was transferred. Father Fortuny stayed only three years. Before secularization, three more fathers oversaw the Sonoma Mission (Hoover et al. 2002, Lynch 1997).

When the mission system disbanded and the lands were given to Mexicans instead of the neophytes, Native Americans were either pushed out of the valley, “employed” by families such as the Vallejos, or died of diseases. There were occasions when immigrants showed some measure of kindness to Native Americans, such as Nick Carriger, who willed that “the Indian Vicente and the tribe be allowed to remain on the home place in the western foothills of Sonoma . . . and have the same privileges of wood, water, fishing, and gardening as they enjoyed in my lifetime” (Lynch 1997).

In 1992, Coast Miwok and Southern Pomo groups established the Federated Indians of Graton Rancheria. They were federally recognized in 2000.

History

Historically, the five project sites lie within the Rancho San José which consisted of 1.5 leagues when granted to Ignacio Pacheco by Governor Alvarado in 1840 (Cowan 1977). Pacheco was born in 1808 in San José. He began a military career at the age of 19 and following his service, he settled on the land granted to him (Hoover et al. 1966). Of the lands originally granted to him, 6,659 acres were patented to Pacheco in 1861. Upon his death in 1864, the land was divided among his six children (Hoover et al. 1966).

Review of 19th and 20th-century maps shows that in 1873, and again in 1892, the project sites were within lands retained by the Pacheco family. In 1914, the land surrounding the study area locations was relatively undeveloped and it wasn’t until post-World War II that increased development is observed on historical maps (Corps 1942, United States Geological Survey [USGS] 1914, 1954).

Historic period site indicators generally include fragments of glass, ceramic, and metal objects; milled and split lumber; and structure and feature remains such as building foundations and discrete trash deposits (e.g., wells, privy pits, dumps).

Cultural Resources Study Findings

Results of the records search indicated that there are two villages within a mile of most of the five project site locations, aside from the Ignacio Boulevard Site (Site 2). Review of 19th and early 20th-century maps and aerial photos did not show any buildings within any of the project site locations.

Sunset Parkway Site (Site 1)

Archival research found that the Sunset Parkway Site and Sunset Parkway staging area have not been previously subjected to a cultural resources study. Three studies have been conducted within one-quarter mile of this Sunset Parkway Site, and ten studies have been conducted within one-quarter mile of the staging area. There are no cultural resources documented within one-quarter mile of the Sunset Parkway Site or staging area. An intensive field survey of the Sunset Parkway Site and staging area were conducted by Origer staff on December 13, 2023. Surface examination consisted of intensively walking in transects measuring five meters or less apart, and a hoe was used as needed to expose the ground surface. No archaeological site indicators were observed during the course of the survey.

Ignacio Boulevard Site (Site 2)

Archival research found that the Ignacio Boulevard Site and staging area have been previously subjected to a cultural resources study. Four studies have been conducted within a one-quarter mile of the Ignacio Boulevard Site and staging area. There are four cultural resources documented within one-quarter mile of the Ignacio Boulevard Site and staging area. An intensive field survey of the Ignacio Boulevard Site and staging area were conducted by Origer staff on December 13, 2023. The nearby Arroyo San Jose creek bank was also examined for buried archaeological site indicators. Surface examination consisted of intensively walking in transects measuring five meters or less apart, and a hoe was used as needed to expose the ground surface. No archaeological site indicators were observed during the course of the survey.

Bolling Drive Site (Site 3)

Archival research found that the Bolling Drive Site and both staging areas have been previously subjected to cultural resources study. In addition to the studies that involved fieldwork, there have been several studies related to evaluating the former Hamilton Army Air Field for its eligibility for inclusion on the National Register of Historic Places. Though some of these studies did involve fieldwork, the fieldwork was related to the identification of potentially important buildings and not archaeological resources. Eight studies have been conducted within one-quarter mile of the Bolling Drive Site and staging areas. There are two cultural resources documented within one-quarter mile of the Bolling Drive Site, the closest of the two is located approximately 750 feet away from the site. An intensive field survey of the Bolling Drive Site and staging areas were conducted by Origer staff on December 13, 2023. Surface examination consisted of intensively walking in transects measuring five meters or less apart, and a hoe was used as needed to expose the ground surface. No archaeological site indicators were observed during the course of the survey.

Main Gate Road Site (Site 4)

Archival research found that the Main Gate Road Site and staging area have been previously subjected to cultural resources study. In addition to the studies that involved fieldwork; there have been several studies related to evaluating the former Hamilton Army Air Field for its eligibility for inclusion on the National Register of Historic Places. Though some of these studies did involve fieldwork, the fieldwork was related to the identification of potentially important buildings and not archaeological resources. Sixteen studies have been conducted within a one-quarter mile of the Main Gate Road Site, and thirteen studies have been conducted within one-quarter mile of the staging area. There are three cultural resources documented within one-quarter mile of the Main Gate Road Site and staging area. All three cultural resources are buildings or structures and the closest lies 945 feet away from the Main Gate Road Site. An intensive field survey of the Main Gate Road Site and staging area were conducted by Origer staff on December 13, 2023. Surface examination consisted of intensively walking in transects measuring five meters or less apart, and a hoe was used as needed to expose the ground surface. No archaeological site indicators were observed during the course of the survey.

C Street Site (Site 5)

Archival research found that the C Street Site and staging area have been previously subjected to cultural resources study. In addition to the studies that involved fieldwork; there have been several studies related to evaluating the former Hamilton Army Air Field for its eligibility for inclusion on the National Register of Historic Places. Though some of these studies did involve fieldwork, the fieldwork was related to the identification of potentially important buildings and

not archaeological resources. Sixteen studies have been conducted within one-quarter mile of the C Street Site, and eighteen studies have been conducted within one-quarter mile of the staging area. There are three cultural resources documented within one-quarter mile of the C Street Site and staging area, all of which are buildings or structures. The closest resource lies approximately 690 feet away from the C Street Site. An intensive field survey of the C Street Site and staging area were conducted by Origer staff on December 13, 2023. Surface examination consisted of intensively walking in transects measuring five meters or less apart, and a hoe was used as needed to expose the ground surface. No archaeological site indicators were observed during the course of the survey.

Existing PS Site

Archival research found that the Existing PS Site has not been previously subjected to a cultural resources study. Five studies have been conducted within one-quarter mile of this study area location. There are no cultural resources documented within one-quarter mile of the Existing PS Site. An intensive field survey of the Existing PS Site and staging area were conducted by Origer staff on December 13, 2023. Surface examination consisted of intensively walking in transects measuring five meters or less apart, and a hoe was used as needed to expose the ground surface. No archaeological site indicators were observed during the course of the survey.

REGULATORY BACKGROUND

Cultural Resources

As set forth in Section 5024.1(c) of the Public Resources Code for a cultural resource to be deemed “important” under CEQA and thus eligible for listing on the California Register of Historical Resources (California Register), it must meet at least one of the following criteria:

1. is associated with events that have made a significant contribution to the broad patterns of California History and cultural heritage; or
2. is associated with the lives of persons important to our past; or
3. embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possess high artistic value; or
4. has yielded or is likely to yield, information important to prehistory or history.

Historic-era structures older than 50 years are most commonly evaluated in reference to Criterion 1 (important events), Criterion 2 (important persons) or Criterion 3 (architectural value). To be considered eligible under these criteria the property, must retain sufficient integrity to convey its important qualities. Integrity is judged in relation to seven aspects including: location, design, setting, materials, workmanship, feeling, and association. Prehistoric and historic-era archaeological resources are commonly evaluated with regard to Criterion 4 (research potential).

Guidelines for the implementation of CEQA define procedures, types of activities, persons, and public agencies required to comply with CEQA. Section 15064.5(b) prescribes that project effects that would “cause a substantial adverse change in the significance of an historical resource” are significant effects on the environment. Substantial adverse changes include both physical changes to the historical resource, or to its immediate surroundings.

Archaeological Resources

Section 21083.2 of the CEQA guidelines also defines “unique archaeological resources” as “any archaeological artifact, object, or site about which it can be clearly demonstrated that, without

merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

- Contains information needed to answer important scientific research questions and show that there is a demonstrable public interest in that information.
- Has a special and particular quality, such as being the oldest of its type or the best available example of its type.
- Is directly associated with a scientifically recognized important prehistoric or historic event or person."

This definition is equally applicable to recognizing "a unique paleontological resource or site." CEQA Section 15064.5 (a)(3)(D), which indicates "generally, a resource shall be considered historically significant if it has yielded, or may be likely to yield, information important in prehistory or history," provides additional guidance.

DISCUSSION OF IMPACTS

a-b) Cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5? Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5?

Alternative A – Less than Significant Impact with Mitigation Incorporated

There are no cultural resources documented within one-quarter mile of the Sunset Parkway Site, Existing PS Site, or the staging area on Sunset Parkway. No buried archaeological site indicators were observed on any site during the field survey performed by Origer staff. The potential for buried archaeological resources to occur on the Sunset Parkway Site, the Existing PS Site, and the staging area on Sunset Parkway is very low (Barrow, 2023). The Cultural Resources Study concluded that no archaeological recommendations are warranted for these sites; however, as standard practice, the project would implement Mitigation Measure CUL-1 pertaining to the accidental discovery of buried archaeological resources on the project sites. The impact would be less than significant with mitigation incorporated.

Alternative B - Less than Significant Impact with Mitigation Incorporated

There are four cultural resources documented within one-quarter mile of the Ignacio Boulevard Site and staging area, and no resources documented within one-quarter mile of the Existing PS Site and staging area on Sunset Parkway. No buried archaeological site indicators were observed on any site during the field survey performed by Origer staff. The potential for buried archaeological resources to occur on the Existing PS Site and Sunset Parkway staging area is very low (Barrow, 2023). The Ignacio Boulevard Site has a high potential for buried archaeological resources; however, examination of the nearby Arroyo San Jose did not show that there are any buried soil layers that would suggest a buried archaeological site is present at this site (Barrow 2023). The Cultural Resources Study concluded that no recommendations are warranted for the Existing PS Site, Ignacio Boulevard Site and staging area, and Sunset Parkway staging area; however, as standard practice, the project would implement Mitigation Measure CUL-1 pertaining to the accidental discovery of buried archaeological resources on the project sites. The impact would be less than significant with mitigation incorporated.

Alternative C - Less than Significant Impact with Mitigation Incorporated

There are two cultural resources documented within one-quarter mile of the Bolling Drive Site

and staging areas, four cultural resources documented within one-quarter mile of the Ignacio Boulevard Site and staging area, and no resources documented within one-quarter mile of the Bolling Drive Site and Sunset Parkway staging area. No buried archaeological site indicators were observed on any site during the field survey performed by Origer staff. The potential for buried archaeological resources to occur on the Bolling Drive Site and staging areas, the Existing PS Site, and Sunset Parkway staging area is very low (Barrow, 2023). The Ignacio Boulevard Site and staging area has a high potential for buried archaeological resources; however, examination of the nearby Arroyo San Jose did not show that there are any buried soil layers that would suggest a buried archaeological site is present at this site (Barrow 2023). The Cultural Resources Study concluded that no recommendations are warranted for the Bolling Drive Site and staging areas, Existing PS Site, Ignacio Boulevard Site and staging area, and Sunset Parkway staging area; however, as standard practice, the project would implement Mitigation Measure CUL-1 pertaining to the accidental discovery of buried archaeological resources on the project sites. The impact would be less than significant with mitigation incorporated.

Alternative D - Less than Significant Impact with Mitigation Incorporated

There are three cultural resources documented within one-quarter mile of the Main Gate Road Site and staging area, four cultural resources documented within one-quarter mile of the Ignacio Boulevard Site and staging area, and no resources documented within one-quarter mile of the Existing PS Site and Sunset Parkway staging area. No buried archaeological site indicators were observed on any site during the field survey performed by Origer staff. The potential for buried archaeological resources to occur on the Existing PS Site and Sunset Parkway staging area is very low (Barrow, 2023). The Ignacio Boulevard Site and staging area has a high potential for buried archaeological resources; however, examination of the nearby Arroyo San Jose did not show that there are any buried soil layers that would suggest a buried archaeological site is present at this site (Barrow 2023). The Cultural Resources Study concluded that no recommendations are warranted for the Existing PS Site, Ignacio Boulevard Site and staging area, and Sunset Parkway staging area; however, as standard practice, the project would implement Mitigation Measure CUL-1 pertaining to the accidental discovery of buried archaeological resources on the project sites.

The Main Gate Road Site and staging area was determined to have a high potential for buried archaeological resources (Barrow 2023). As recommended by the Cultural Resources Study, in addition to Mitigation Measure CUL-1, project work at the Main Gate Road Site will adhere to Mitigation Measure CUL-2. Mitigation Measure CUL-2 requires that construction crews receive an archaeological training session prior to the commencement of excavation work, and that an archaeologist who meets the Secretary of the Interiors Standards for Archaeology monitor all excavation work on-site. As the Main Gate Road Site staging area will primarily be used for storing equipment, Mitigation Measure CUL-2 is not applicable to the portion of the staging area outside of the site. With implementation of Mitigation Measures CUL-1 and CUL-2, the project would not cause a change in the significance of a historical or archaeological resource. The impact would be less than significant with mitigation incorporated.

Alternative E – Less than Significant Impact with Mitigation Incorporated

There are three cultural resources documented within one-quarter mile of the C Street Site and staging area, four cultural resources documented within one-quarter mile of the Ignacio Boulevard Site and staging area, and no resources documented within one-quarter mile of the Existing PS Site and Sunset Parkway staging area. No buried archaeological site indicators were observed on any site during the field survey performed by Origer staff. The potential for buried

archaeological resources to occur on the Existing PS Site and Sunset Parkway staging area is very low (Barrow, 2023). The Ignacio Boulevard Site has a high potential for buried archaeological resources; however, examination of the nearby Arroyo San Jose did not show that there are any buried soil layers that would suggest a buried archaeological site is present at this site (Barrow 2023). The Cultural Resources Study concluded that no recommendations are warranted for the Existing PS Site, Ignacio Boulevard Site and staging area, and Sunset Parkway staging area; however, as standard practice, the project would implement Mitigation Measure CUL-1 pertaining to the accidental discovery of buried archaeological resources on the project sites.

The C Street Site was determined to have a high potential for buried archaeological resources (Barrow 2023). As recommended by the Cultural Resources Study, in addition to Mitigation Measure CUL-1, project work at the C Street Site will adhere to Mitigation Measure CUL-2. Mitigation Measure CUL-2 requires that construction crews receive an archaeological training session prior to the commencement of excavation work, and that an archaeologist who meets the Secretary of the Interiors Standards for Archaeology monitor all excavation work on-site. As the C Street Site staging area will primarily be used for storing equipment, Mitigation Measure CUL-2 is not applicable to the portion of the staging area outside of the site. With implementation of Mitigation Measures CUL-1 and CUL-2, the project would not cause a change in the significance of a historical or archaeological resource. The impact would be less than significant with mitigation incorporated.

c) *Disturb any human remains, including those interred outside of dedicated cemeteries?*

Alternative A – Less than Significant Impact with Mitigation Incorporated

No buried archaeological site indicators were observed on any site during the field survey performed by Origer staff. The potential for buried archaeological resources to occur on the Sunset Parkway Site, the Existing PS Site, and the staging area on Sunset Parkway is very low (Barrow, 2023). The Cultural Resources Study concluded that no archaeological recommendations are warranted for these sites; however, as standard practice, the project would implement Mitigation Measure CUL-3 pertaining to the accidental discovery of buried human remains on the project sites. Implementation of Mitigation Measure CUL-3 would ensure that the project would not disturb interred human remains. The impact would be less than significant with mitigation incorporated.

Alternative B – Less than Significant Impact with Mitigation Incorporated

No buried archaeological site indicators were observed on any site during the field survey performed by Origer staff. The potential for buried archaeological resources to occur on the Existing PS Site and Sunset Parkway staging area is very low (Barrow, 2023). The Ignacio Boulevard Site has a high potential for buried archaeological resources; however, examination of the nearby Arroyo San Jose did not show that there are any buried soil layers that would suggest a buried archaeological site is present at this site (Barrow 2023). The Cultural Resources Study concluded that no recommendations are warranted for the Existing PS Site, Ignacio Boulevard Site and staging area, and Sunset Parkway staging area; however, as standard practice, the project would implement Mitigation Measure CUL-3 pertaining to the accidental discovery of buried human remains on the project sites. Implementation of Mitigation Measure CUL-3 would ensure that the project would not disturb interred human remains. The impact would be less than significant with mitigation incorporated.

Alternative C - Less than Significant Impact with Mitigation Incorporated

No buried archaeological site indicators were observed on any site during the field survey performed by Origer staff. The potential for buried archaeological resources to occur on the Bolling Drive Site, the Existing PS Site, and Sunset Parkway staging area is very low (Barrow, 2023). The Ignacio Boulevard Site has a high potential for buried archaeological resources; however, examination of the nearby Arroyo San Jose did not show that there are any buried soil layers that would suggest a buried archaeological site is present at this site (Barrow 2023). The Cultural Resources Study concluded that no recommendations are warranted for the Bolling Drive Site and staging areas, Existing PS Site, Ignacio Boulevard Site and staging area, and Sunset Parkway staging area; however, as standard practice, the project would implement Mitigation Measure CUL-3 pertaining to the accidental discovery of buried human remains on the project sites. Implementation of Mitigation Measure CUL-3 would ensure that the project would not disturb interred human remains. The impact would be less than significant with mitigation incorporated.

Alternative D - Less than Significant Impact with Mitigation Incorporated

No buried archaeological site indicators were observed on any site during the field survey performed by Origer staff. The potential for buried archaeological resources to occur on the Existing PS Site and Sunset Parkway staging area is very low (Barrow, 2023). The Ignacio Boulevard Site has a high potential for buried archaeological resources; however, examination of the nearby Arroyo San Jose did not show that there are any buried soil layers that would suggest a buried archaeological site is present at this site (Barrow 2023). The Main Gate Road Site was determined to have a high potential for buried archaeological resources (Barrow 2023). As standard practice, the project would implement Mitigation Measure CUL-3 pertaining to the accidental discovery of buried human remains on the project sites. Implementation of Mitigation Measure CUL-3 would ensure that the project would not disturb interred human remains. The impact would be less than significant with mitigation incorporated.

Alternative E - Less than Significant Impact with Mitigation Incorporated

No buried archaeological site indicators were observed on any site during the field survey performed by Origer staff. The potential for buried archaeological resources to occur on the Existing PS Site and Sunset Parkway staging area is very low (Barrow, 2023). The Ignacio Boulevard Site has a high potential for buried archaeological resources; however, examination of the nearby Arroyo San Jose did not show that there are any buried soil layers that would suggest a buried archaeological site is present at this site (Barrow 2023). The C Street Site was determined to have a high potential for buried archaeological resources (Barrow 2023). As standard practice, the project would implement Mitigation Measure CUL-3 pertaining to the accidental discovery of buried human on the project sites. Implementation of Mitigation Measure CUL-3 would ensure that the project would not disturb interred human remains. The impact would be less than significant with mitigation incorporated.

MITIGATION MEASURES

Mitigation Measure CUL-1: Buried Archaeological Resources

In keeping with the CEQA guidelines, if archaeological remains are uncovered, work at the place of discovery should be halted immediately until a qualified archaeologist can evaluate the finds (§15064.5 [f]). Prehistoric archaeological site indicators include: obsidian and chert flakes and chipped stone tools; grinding and mashing implements (e.g., slabs and handstones, and mortars

and pestles); bedrock outcrops and boulders with mortar cups; and locally darkened midden soils. Midden soils may contain a combination of any of the previously listed items with the possible addition of bone and shell remains, and fire-affected stones. Historic period site indicators generally include: fragments of glass, ceramic, and metal objects; milled and split lumber; and structure and feature remains such as building foundations and discrete trash deposits (e.g., wells, privy pits, dumps).

Mitigation Measure CUL-2: Archaeological Training and Excavation Monitoring

The project construction crew shall receive an archaeological training session prior to the commencement of any excavation work. In addition, excavation work shall be monitored by an archaeologist who meets or is overseen by an archaeologist who meets the Secretary of the Interiors Standards for Archaeology.

Mitigation Measure CUL-3: Human Remains

If human remains are encountered, excavation or disturbance of the location must be halted in the vicinity of the find, and the county coroner contacted. If the coroner determines the remains are Native American, the coroner will contact the Native American Heritage Commission (NAHC). The NAHC will identify the person or persons believed to be most likely descended from the deceased Native American. The most likely descendent makes recommendations regarding the treatment of the remains with appropriate dignity.

CONCLUSION

Under Alternatives A through E, impacts related to cultural resources could be mitigated to a less-than-significant level with the implementation of mitigation measures. Alternative A would have the least significant impact on cultural resources because the project sites have a very low potential for buried archaeological resources. Alternatives B and C would have a slightly more substantial impact than Alternative A due to the high potential of the Ignacio Boulevard Site for buried archaeological resources. Alternatives D and E would have the potential for the most significant impact on cultural resources and would require one additional mitigation measure (CUL-2) due to the high potential of the Main Gate Road Site and C Street Site for buried archaeological resources. However, impacts to cultural resources under Alternative D and E would still be reduced to a less-than-significant level with the implementation of Mitigation Measures CUL-1, CUL-2, and CUL-3.

4.2.6 Energy

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

ENVIRONMENTAL SETTING

Power in the City is supplied by Pacific Gas & Electric (PG&E) and Marin Clean Energy (MCE). MCE is a joint powers authority among Marin jurisdictions (cities and the County) that the City joined in 2012. Prior to the City’s participation in MCE, power was solely provided by PG&E. In April, July, and August 2012, MCE sent opt-out notices to Novato households. All residents who did not opt-out were automatically enrolled in MCE. Currently, Novato residents have the choice of receiving energy from PG&E or choosing between three MCE energy service plans (City of Novato “Marin Clean Energy”).

REGULATORY BACKGROUND

City of Novato General Plan

While the District is exempt from the City of Novato local ordinances with the exception of an Encroachment Permit, the City’s General Plan contains the following relevant policies related to energy:

Policy ES 25: Energy and Water Conservation. Increase energy and water efficiency and conservation in City buildings, equipment and operations. Promote energy and water conservation and building upgrades to the community.

City of Novato Climate Change Action Plan

The City’s CCAP was adopted in December 2009 and is currently in the process of being updated. The CCAP serves as a culmination of an array of all related sustainability initiatives taken by the City and provides a coordinated strategy and direction for all related efforts to follow (City of Novato 2009).

DISCUSSION OF IMPACTS

a) ***Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?***

Alternatives A through E - Less than Significant Impact

The use of equipment and vehicles during project construction would require the use of energy resources. The construction process would be designed to be efficient to avoid excess monetary costs. Specifically, equipment and fuel would not be used wastefully during construction due to the added expense associated with renting, maintaining, and fueling equipment. As such, energy and fuel would not be wasted or used inefficiently by construction equipment and vehicles.

Project operation would not result in wasteful, inefficient, or unnecessary consumption of energy resources. All proposed new PS would be serviced by PG&E and would include electrical components such as a main service-entrance switchboard, facility standby power provisions, a Motor Control Center and Variable Frequency Drive Equipment. All electrical components would be built in accordance with current standards and specifications for PS equipment, including PG&E and Electric Utility Service Equipment Requirements and standards (F&L 2023). Each proposed new PS would include a non-electrical heating, ventilation, and air conditioning (HVAC) system to cool the interior of the building from heat generated by the electrical equipment. The HVAC system would be designed to be energy efficient and would not constitute a wasteful, inefficient, or unnecessary consumption of energy resources. Therefore, the project's impacts related to wasteful, inefficient, or unnecessary consumption of energy resources would be less than significant.

b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Alternatives A through E – No Impact

The proposed project is within the planning area of the City's CCAP, which contains goals and mitigation measures for the City to implement in order to comply with Statewide mandates for GHG emissions reductions and energy efficiency. The District is a self-permitting agency and is not required to comply with City policies, programs, and ordinances; however, the project would not result in an inefficient or wasteful use of energy resources, and therefore would not conflict with the CCAP or goals of the City's General Plan pertaining to energy resources. No impact would occur.

CONCLUSION

Project activities under A through E would result in a less than significant impact related to energy resources per the CEQA Guidelines. Alternatives C, D, and E would result in a more substantial impact related to the use of energy resources because two new PS would be constructed rather than one. The construction of two new PS under Alternatives C, D, and E would take approximately eight more months than constructing one new PS under Alternative A or B. Alternative A would have the least substantial impact related to the use of energy resources because it would require less vehicle trips than any other Alternative. However, these impacts would be less than significant.



4.2.7 Geology and Soils

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code, creating substantial direct or indirect risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

ENVIRONMENTAL SETTING - REGIONAL

The project sites lie within the Coast Ranges geomorphic province (California Geological Survey [CGS] 2022). The Coast Ranges province runs almost directly parallel to the San Andreas Fault, beginning in the Central California Coast and extending north to the State boundary. The Coast Ranges are composed of thick Mesozoic and Cenozoic sedimentary strata. The northern and southern ranges are separated by a depression containing the San Francisco Bay. The northern Coast Ranges, in which the project sites are located, are dominated by irregular, knobby, landslide-topography of the Franciscan Complex (CGS 2002). The northern and western portion of Novato is underlain by Franciscan assemblages consisting of a mixture of metamorphosed sandstone, shale, volcanics, serpentinite, and chert. The eastern area is underlain by Great Valley sequence rock, which is mostly shale that has been deposited in a deep-marine setting, with thick bodies of sandstone and other conglomerate (City of Novato 2020b).

The San Francisco Bay Region is situated on a plate boundary marked by the San Andreas Fault system, which forms the tectonic boundary between the Pacific Plate and the North American Plate. The region consists of several northwest trending active and potentially active faults. Movement along this plate boundary occurs across a system of strike-slip, right-lateral, parallel, and sub-parallel faults. In the project area, these faults include the San Andrea, Burdell Mountain, Tolay, Rodgers Creek, and Hayward fault zones (City of Novato 2020b). Various other pre-Quaternary faults are located in the project area (California Department of Conservation [CDC] 2015).

ENVIRONMENTAL SETTING – LOCAL

Sunset Parkway Site (Site 1)

The Sunset Parkway Site is underlain by Early to late Pleistocene deposits, undivided, which consists of alluvial fan, stream terrace, basin, and channel deposits (Clahan et al. 2002). The Sunset Parkway Site and staging area are underlain by soils of the Xerorthents – Urban land complex with zero to nine percent slopes (United States Department of Agriculture [USDA] National Resource Conservation Service [NRCS] 2019). This unit is composed of 45 percent xerorthents and similar soils, 40 percent urban land, and 14 percent minor components. Two pre-Quaternary faults are located within one mile of the Sunset Parkway Site, including one approximately 0.27 miles north and one 0.65 miles east of the site (CDC 2015).

Ignacio Boulevard Site (Site 2)

The Ignacio Boulevard Site is underlain by Holocene alluvium, undivided, which includes alluvium deposited on fans, terraces, or in basins. Soils typically consist of gravel, sand, and silt that are poorly to moderately sorted (Clahan et al. 2002). The Ignacio Boulevard Site and staging area are underlain by soils of the Xerorthents – Urban land complex with zero to nine percent slopes (USDA NRCS 2019). Two pre-Quaternary faults are located within one mile of the Ignacio Boulevard Site, including one approximately 0.43 miles northeast and one approximately 0.75 miles southwest (CDC 2015).

Bolling Drive Site (Site 3)

The Bolling Drive Site is underlain by Franciscan Complex mélangé, which consists of a tectonic mixture of masses of resistant rock types including sandstone, altered mafic volcanic rock (greenstone), chert, serpentinite, and exotic metamorphic rocks embedded in a sheared, shaley matrix (Clahan et al. 2002). The Bolling Drive Site and staging area are underlain by soils of the Saurin-urban land-Bonnydoon complex with 30 to 50 percent slopes. This unit is composed of 30

percent Saurin and similar soils, 25 percent urban land, 20 percent Bonnydoon and similar soils, and 21 percent minor components. Two pre-Quaternary faults are located within one mile of the Bolling Drive Site, including one approximately 0.40 miles south and one approximately 0.70 miles west (CDC 2015).

Main Gate Road Site (Site 4)

The Main Gate Road Site is underlain by Holocene alluvium, undivided, which includes alluvium deposited on fans, terraces, or in basins. Soils typically consist of gravel, sand, and silt that are poorly to moderately sorted (Clahan et al. 2002). The Main Gate Road Site and staging area are underlain by soils of the Xerorthents – Urban land complex with zero to nine percent slopes (USDA NRCS 2019). Two pre-Quaternary faults are located within one mile of the Main Gate Road Site, including one approximately 0.42 miles west and one approximately 0.70 miles south (CDC 2015).

C Street Site (Site 5)

The C Street Site is underlain by Holocene alluvium, undivided, which includes alluvium deposited on fans, terraces, or in basins. Soils typically consist of gravel, sand, and silt that are poorly to moderately sorted (Clahan et al. 2002). The C Street Site and staging area are underlain by soils of the Xerorthents – Urban land complex with zero to nine percent slopes (USDA NRCS 2019). Two pre-Quaternary faults are located within one mile of the C Street Site, including one approximately 0.55 miles west and one approximately 0.70 miles south (CDC 2015).

Existing PS Site

The Existing PS Site is underlain by Early to late Pleistocene deposits, undivided, which consists of alluvial fan, stream terrace, basin, and channel deposits (Clahan et al. 2002). The C Street Site and staging area are underlain by soils of the Xerorthents – Urban land complex with zero to nine percent slopes (USDA NRCS 2019). The nearest trace of the Burdell Mountain Fault zone is located approximately 1.90 miles northeast of the Existing PS Site. Two pre-Quaternary faults are located within one mile of the Existing PS Site, including one approximately 0.26 miles northwest and one 0.60 miles east of the site (CDC 2015).

DISCUSSION OF IMPACTS

α-i) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: 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?

None of the project sites are located within a fault zone or on a fault, but the active faults and potentially active faults are located within the vicinity of the project sites. The nearest potentially active fault trace is the Burdell Mountain Fault. Other close major faults are the San Andreas, Rodgers Creek, and Hayward faults. These faults are capable of producing minor to major earthquakes; therefore, there is potential for the project sites to experience high intensity ground shaking. However, the likelihood of surface rupture occurring from active faulting at the sites is small.

Alternative A – Less than Significant Impact

The project sites do not lie within a State mandated Alquist-Priolo Earthquake Fault Zone, as

identified by the most recent Alquist-Priolo Fault Zoning Map issued by the State Geologist (CGS 2023). The nearest pre-Quaternary faults are located approximately 0.27 miles north of the Sunset Parkway Site and 0.26 miles northwest of the Existing PS Site. For land use planning purposes, pre-Quaternary faults are presumed to be effectively inactive per the Alquist-Priolo Act and do not require further investigation. This is not meant to imply that inactive fault traces will not rupture, only that they have not been shown to have ruptured for at least 1.6 million years and that the probability of fault rupture is low.

Although unlikely, rupture of the nearby Burdell Mountain Fault or other pre-Quaternary faults could pose potential risks to construction workers on project sites. The project contractor would comply with all federal Occupational Safety and Health Administration (OSHA) and California OSHA (Cal/OSHA) requirements related to construction worker safety, which would reduce risks associated with fault rupture during construction to a less-than-significant level. Operation of the proposed project would not cause substantial effects associated with rupture of a known earthquake fault. Therefore, potential direct or indirect impacts, including the risk of loss, injury, or death involving rupture of a known earthquake fault as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map, and/or strong seismic ground shaking, would be less than significant.

Alternative B – Less than Significant Impact

The project sites do not lie within a State mandated Alquist-Priolo Earthquake Fault Zone, as identified by the most recent Alquist-Priolo Fault Zoning Map issued by the State Geologist (CGS 2023). The nearest pre-Quaternary faults are located approximately 0.43 miles northeast of the Ignacio Boulevard Site and 0.26 miles northwest of the Existing PS Site. For land use planning purposes, pre-Quaternary faults are presumed to be effectively inactive per the Alquist-Priolo Act and do not require further investigation. This is not meant to imply that inactive fault traces will not rupture, only that they have not been shown to have ruptured for at least 1.6 million years and that the probability of fault rupture is low.

Although unlikely, rupture of the nearby Burdell Mountain Fault or other pre-Quaternary faults could pose potential risks to construction workers on project sites. The project contractor would comply with all federal OSHA and Cal/OSHA requirements related to construction worker safety, which would reduce risks associated with fault rupture during construction to a less than significant level. Operation of the proposed project would not cause substantial effects associated with rupture of a known earthquake fault. Therefore, potential direct or indirect impacts, including the risk of loss, injury, or death involving rupture of a known earthquake fault as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map, and/or strong seismic ground shaking, would be less than significant.

Alternative C – Less than Significant Impact

The project sites do not lie within a State mandated Alquist-Priolo Earthquake Fault Zone, as identified by the most recent Alquist-Priolo Fault Zoning Map issued by the State Geologist (CGS 2023). The nearest pre-Quaternary faults are located approximately 0.40 miles south of the Bolling Drive Site, approximately 0.43 miles northeast of the Ignacio Boulevard Site, and 0.26 miles northwest of the Existing PS Site. For land use planning purposes, pre-Quaternary faults are presumed to be effectively inactive per the Alquist-Priolo Act and do not require further investigation. This is not meant to imply that inactive fault traces will not rupture, only that they have not been shown to have ruptured for at least 1.6 million years and that the probability of fault rupture is low.

Although unlikely, rupture of the nearby Burdell Mountain Fault or other pre-Quaternary faults could pose potential risks to construction workers on project sites. The project contractor would comply with all federal OSHA and Cal/OSHA requirements related to construction worker safety, which would reduce risks associated with fault rupture during construction to a less than significant level. Operation of the proposed project would not cause substantial effects associated with rupture of a known earthquake fault. Therefore, potential direct or indirect impacts, including the risk of loss, injury, or death involving rupture of a known earthquake fault as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map, and/or strong seismic ground shaking, would be less than significant.

Alternative D – Less than Significant Impact

The project sites do not lie within a State mandated Alquist-Priolo Earthquake Fault Zone, as identified by the most recent Alquist-Priolo Fault Zoning Map issued by the State Geologist (CGS 2023). The nearest pre-Quaternary fault is located approximately 0.42 miles west of the Main Gate Road Site, approximately 0.43 miles northeast of the Ignacio Boulevard Site, and 0.26 miles northwest of the Existing PS Site. For land use planning purposes, pre-Quaternary faults are presumed to be effectively inactive per the Alquist-Priolo Act and do not require further investigation. This is not meant to imply that inactive fault traces will not rupture, only that they have not been shown to have ruptured for at least 1.6 million years and that the probability of fault rupture is low.

Although unlikely, rupture of the nearby Burdell Mountain Fault or other pre-Quaternary faults could pose potential risks to construction workers on project sites. The project contractor would comply with all federal OSHA and Cal/OSHA requirements related to construction worker safety, which would reduce risks associated with fault rupture during construction to a less than significant level. Operation of the proposed project would not cause substantial effects associated with rupture of a known earthquake fault. Therefore, potential direct or indirect impacts, including the risk of loss, injury, or death involving rupture of a known earthquake fault as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map, and/or strong seismic ground shaking, would be less than significant.

Alternative E – Less than Significant Impact

The project sites do not lie within a State mandated Alquist-Priolo Earthquake Fault Zone, as identified by the most recent Alquist-Priolo Fault Zoning Map issued by the State Geologist (CGS 2023). The nearest pre-Quaternary fault is located approximately 0.55 miles west of the C Street Site, approximately 0.43 miles northeast of the Ignacio Boulevard Site, and 0.26 miles northwest of the Existing PS Site. For land use planning purposes, pre-Quaternary faults are presumed to be effectively inactive per the Alquist-Priolo Act and do not require further investigation. This is not meant to imply that inactive fault traces will not rupture, only that they have not been shown to have ruptured for at least 1.6 million years and that the probability of fault rupture is low.

Although unlikely, rupture of the nearby Burdell Mountain Fault or other pre-Quaternary faults could pose potential risks to construction workers on project sites. The project contractor would comply with all federal OSHA and Cal/OSHA requirements related to construction worker safety, which would reduce risks associated with fault rupture during construction to a less than significant level. Operation of the proposed project would not cause substantial effects associated with rupture of a known earthquake fault. Therefore, potential direct or indirect impacts, including the risk of loss, injury, or death involving rupture of a known earthquake fault

as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map, and/or strong seismic ground shaking, would be less than significant.

a-ii) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: Strong seismic ground shaking?

Alternatives A through E - Less than Significant Impact

The project sites have the potential to endure strong seismic ground shaking from earthquakes that could occur on active and potentially active faults in the region. The project contractor would comply with all federal OSHA and Cal/OSHA requirements related to construction worker safety, which would reduce risks associated with strong seismic ground shaking during construction to a less than significant level. Operation of the proposed project under Alternatives A through E would not cause substantial effects associated with strong seismic ground shaking. The new PS would be constructed in accordance with applicable building standards which would prevent substantial adverse effects, including loss, injury, or death, associated with strong seismic ground shaking during project operation. The impact of the proposed project related to strong seismic ground shaking would be less than significant.

a-iii) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: Seismic-related ground failure, including liquefaction?

Alternative A – Less than Significant Impact

Liquefaction primarily occurs in relatively loose, saturated, cohesionless soils that lose their strength and become incapable of supporting the weight of overlying soils or structures when subject to earthquake stresses. The Sunset Parkway Site and Existing PS Site are not located within a Liquefaction Zone of an earthquake zone of required investigation (CGS 2023). The Existing PS Site is located in an area of very low liquefaction potential; however, the staging area on Sunset Parkway is situated in an area of high liquefaction potential as identified by the County (Cal Engineering & Geology [CE&G] 2023; County of Marin 2020). No construction work would occur at the staging area, it would only be used for storage of equipment and materials. In addition, development under the proposed project would be required to comply with the California Building Code (CBC), which would ensure that expansive soils are remediated or that foundations and structures are engineered to withstand potential instances of liquefaction. As such, the project would not cause adverse effects including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction. The impact would be less than significant.

Alternative B – Less than Significant Impact

The Ignacio Boulevard Site and Existing PS Site are not located within a liquefaction zone of an earthquake zone of required investigation (CGS 2023). The Ignacio Boulevard Site has a moderate liquefaction susceptibility, with the exception of soils along the Arroyo San Jose Creek, which have a high liquefaction susceptibility (CE&G 2023). The Existing PS Site is located within an area of very low liquefaction potential; however, the staging area on Sunset Parkway is situated in an area of high liquefaction potential as identified by the County (CG&E 2023; County of Marin 2020). No construction work would occur at the staging area, it would only be used for storage of equipment and materials. Development under the proposed project would be required to comply with the CBC, which would ensure that expansive soils are remediated or that foundations and structures are engineered to withstand potential instances of liquefaction. Compliance with the requirements of the CBC would reduce this impact during project operation



to a less than significant level. As such, the project would not cause adverse effects including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction. The impact would be less than significant.

Alternative C – Less than Significant Impact

The Bolling Drive Site, Ignacio Boulevard Site, and Existing PS Site are not located within a Liquefaction Zone of an earthquake zone of required investigation (CGS 2023). The Bolling Drive Site has a very low liquefaction susceptibility (CE&G 2023). The Ignacio Boulevard Site has a moderate liquefaction susceptibility, with the exception of soils along the Arroyo San Jose Creek, which have a high liquefaction susceptibility. The Existing PS Site is located within an area of very low liquefaction potential; however, the staging area on Sunset Parkway is situated in an area of high liquefaction potential as identified by the County (CE&G 2023; County of Marin 2020). No construction work would occur at the staging area, it would only be used for storage of equipment and materials. Development under the proposed project would be required to comply with the CBC, which would ensure that expansive soils are remediated or that foundations and structures are engineered to withstand potential instances of liquefaction. Compliance with the requirements of the CBC would reduce this impact during project operation to a less than significant level. As such, the project would not cause adverse effects including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction. The impact would be less than significant.

Alternative D – Less than Significant Impact

The Main Gate Road Site, Ignacio Boulevard Site, and Existing PS Site are not located within a Liquefaction Zone of an earthquake zone of required investigation (CGS 2023). The Main Gate Road Site is situated in an area of moderate liquefaction susceptibility (Witter et al. 2006). The Ignacio Boulevard Site has a moderate liquefaction susceptibility, with the exception of soils along the Arroyo San Jose Creek, which have a high liquefaction susceptibility (CE&G 2023). The Existing PS Site is located within an area of very low liquefaction potential; however, the staging area on Sunset Parkway is situated in an area of high liquefaction potential as identified by the County (CE&G 2023; County of Marin 2020). No construction work would occur at the staging area, it would only be used for storage of equipment and materials. Development under the proposed project would be required to comply with the CBC, which would ensure that expansive soils are remediated or that foundations and structures are engineered to withstand potential instances of liquefaction. Compliance with the requirements of the CBC would reduce this impact during project operation to a less than significant level. As such, the project would not cause adverse effects including the risk of loss, injury, or death due to seismic-related ground failure, including liquefaction. The impact would be less than significant.

Alternative E – Less than Significant Impact

The C Street Site, Ignacio Boulevard Site, and Existing PS Site are not located within a Liquefaction Zone of an earthquake zone of required investigation (CGS 2023). The C Street Site is situated in an area of moderate liquefaction potential (Witter et al. 2006). The Ignacio Boulevard Site has a moderate liquefaction susceptibility, with the exception of soils along the Arroyo San Jose Creek, which have a high liquefaction susceptibility (CE&G 2023). The Existing PS Site is located within an area of very low liquefaction potential; however, the staging area on Sunset Parkway is situated in an area of high liquefaction potential as identified by the County (CE&G 2023; County of Marin 2020). No construction work would occur at the staging area, it would only be used for storage of equipment and materials. Development under the proposed project would be required to comply with the CBC, which would ensure that expansive soils are

remediated or that foundations and structures are engineered to withstand potential instances of liquefaction. Compliance with the requirements of the CBC would reduce this impact during project operation to a less than significant level. As such, the project would not cause adverse effects including the risk of loss, injury, or death involving rupture of a known earthquake fault. The impact would be less than significant.

a-iv) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: Landslides?

Alternative A – No Impact

The Sunset Parkway Site and Existing PS Site are not located within a Landslide Zone of an earthquake zone of required investigation (CGS 2023). The project sites are located in relatively flat areas and are not near any steep slopes, and therefore, landsliding is unlikely to occur on or within the site vicinities (CE&G 2023) The sites are mapped as “surficial deposits” and are not categorized as being at risk of landslide (County of Marin 2020). Therefore, Alternative A would not directly or indirectly cause substantial adverse effects related to landslides. No impact would occur.

Alternative B – No Impact

The Ignacio Boulevard Site and Existing PS Site are not located within a Landslide Zone of an earthquake zone of required investigation (CGS 2023). The project sites are located in relatively flat areas and are not near any steep slopes, and therefore, landsliding is unlikely to occur on or within the site vicinities (CG&E 2023). The sites are mapped as “surficial deposits” and are not categorized as being at risk of landslide (County of Marin 2020). Therefore, Alternative B would not directly or indirectly cause substantial adverse effects related to landslides. No impact would occur.

Alternative C – Less than Significant Impact

The Bolling Drive Site, Ignacio Boulevard Site, and Existing PS Site are not located within a Landslide Zone of an earthquake zone of required investigation (CGS 2023). The Bolling Drive Site is located on a moderately sloping hillside underlain by shallow bedrock. Although shallow sliding of the surface soils is possible, negative impacts to the proposed PS due to landsliding at this site is unlikely (CE&G 2023). The Ignacio Boulevard Site and Existing PS Site are situated in relatively flat areas and therefore, landsliding is unlikely to occur on or within the site vicinities (CE&G 2023). The sites are mapped as “surficial deposits” and are not categorized as being at risk of landslide (County of Marin 2020). Development under the proposed project would be required to comply with the CBC and the project would not include high-intensity ground disturbing activities, and is therefore not likely to directly cause a landslide to occur. As such, Alternative C would not directly or indirectly cause substantial adverse effects related to landslides. The impact would be less than significant.

Alternative D – No Impact

The Main Gate Road Site, Ignacio Boulevard Site, and Existing PS Site are not located within a Landslide Zone of an earthquake zone of required investigation (CGS 2023). The project sites are located in relatively flat areas and are not near any steep slopes. The sites are mapped as “surficial deposits” and are not categorized as being at risk of landslide (County of Marin 2020). Therefore, Alternative D would not directly or indirectly cause substantial adverse effects related to landslides. No impact would occur.

Alternative E – No Impact

The C Street Site, Ignacio Boulevard Site, and Existing PS Site are not located within a Landslide Zone of an earthquake zone of required investigation (CGS 2023). The project sites are located in relatively flat areas and are not near any steep slopes. The sites are mapped as “surficial deposits” and are not categorized as being at risk of landslide (County of Marin 2020).

Therefore, Alternative E would not directly or indirectly cause substantial adverse effects related to landslides. No impact would occur.

b) Result in substantial soil erosion or the loss of topsoil?

Alternative A – Less than Significant Impact with Mitigation Incorporated

The Sunset Parkway Site and Existing PS Site are situated in relatively flat, developed medians within Sunset Parkway, and therefore are not highly susceptible to erosion. In addition, soils on the Sunset Parkway Site and Existing PS Site are assumed to be composed of engineered fill, and therefore, substantial loss of native soils would not occur. During construction, activities such as stockpiling, grading, excavation, and earth-disturbing activities would result in loose and disturbed soils on the project sites. Loose and disturbed soils are more prone to erosion and loss of topsoil by wind and water. As described in Section 4.2.10, Hydrology and Water Quality, the District would implement Mitigation Measure HYDRO-1, which requires the preparation and implementation of an Erosion Control Plan. The Erosion Control Plan shall be prepared by a registered professional engineer and include BMPs to minimize siltation, sedimentation, and erosion. After construction is finished, the disturbed areas of the project sites will be developed with ornamental landscaping, which will minimize erosion during rainfall events. Implementation of Mitigation Measure HYDRO-1 would ensure that the project would not cause substantial erosion or loss of topsoil. The impact would be less than significant with mitigation incorporated.

Alternative B – Less than Significant Impact with Mitigation Incorporated

The Ignacio Boulevard Site is located in an open space area that is primarily developed with ornamental landscaping. The Existing PS Site is situated in a developed median within Sunset Parkway, which is assumed to be underlain by soils composed of engineered fill (non-native). Both sites are located in relatively flat areas, and thus are not highly susceptible to erosion. During construction, activities such as stockpiling, grading, excavation, and earth-disturbing activities would result in loose and disturbed soils on the project sites. Loose and disturbed soils are more prone to erosion and loss of topsoil by wind and water. As described in Section 4.2.10, Hydrology and Water Quality, the District would implement Mitigation Measure HYDRO-1, which requires the preparation and implementation of an Erosion Control Plan. The Erosion Control Plan shall be prepared by a registered professional engineer and include BMPs to minimize siltation, sedimentation, and erosion. After construction is finished, the disturbed areas of the project sites will be developed with ornamental landscaping, which will minimize erosion during rainfall events. Implementation of Mitigation Measure HYDRO-1 would ensure that the project would not cause substantial erosion or loss of topsoil. The impact would be less than significant with mitigation incorporated.

Alternative C – Less than Significant Impact with Mitigation Incorporated

The Ignacio Boulevard Site and Bolling Drive Site are located in open space areas that are primarily developed with ornamental landscaping. The Existing PS Site is situated in a developed median within Sunset Parkway, which is assumed to be underlain by soils composed of engineered fill (non-native). Both the Ignacio Boulevard Site and Existing PS Site are located in

relatively flat areas, and thus are not highly susceptible to erosion. The Bolling Drive Site is situated on a moderately sloping hillside, and may be more susceptible to erosion due to the downstream movement of surface runoff water which could carry on-site sediment into nearby waterways. During construction, activities such as stockpiling, grading, excavation, and earth-disturbing activities would result in loose and disturbed soils on the project sites. Loose and disturbed soils are more prone to erosion and loss of topsoil by wind and water. As described in Section 4.2.10, Hydrology and Water Quality, the District would implement Mitigation Measure HYDRO-1, which requires the preparation and implementation of an Erosion Control Plan. The Erosion Control Plan shall be prepared by a registered professional engineer and include BMPs to minimize siltation, sedimentation, and erosion. After construction is finished, the disturbed areas of the project sites will be developed with ornamental landscaping, which will minimize erosion during rainfall events.

The total project footprint under Alternative C for the Existing PS Site, Ignacio Boulevard Site, and Bolling Drive Site combined would be over once acre. As such, a Stormwater Pollution Prevention Plan (SWPPP) would be required in order to comply with requirements of the federal Construction General Permit, which is required for projects that disturb over one acre of ground. The SWPPP will contain measures to control surface runoff, reduce erosion, and minimize the potential for sediment to leave the project sites and enter waterways during construction activities. The District would be responsible for preparing the SWPPP prior to the start of ground disturbing activities at any project, and the measures contained in the SWPPP would be implemented and enforced throughout project construction. In addition to implementing Mitigation Measure HYDRO-1, the SWPPP would ensure that the project would not cause substantial erosion or loss of topsoil. The impact would be less than significant with mitigation incorporated.

Alternative D – Less than Significant Impact with Mitigation Incorporated

The Main Gate Road Site and Ignacio Boulevard Site are located in an open space area developed with ornamental landscaping. The Existing PS Site is situated in a developed median within Sunset Parkway, which is assumed to be underlain by soils composed of engineered fill (non-native). All sites are located in relatively flat areas, and thus are not highly susceptible to erosion. During construction, activities such as stockpiling, grading, excavation, and earth-disturbing activities would result in loose and disturbed soils on the project sites. Loose and disturbed soils are more prone to erosion and loss of topsoil by wind and water. As described in Section 4.2.10, Hydrology and Water Quality, the District would implement Mitigation Measure HYDRO-1, which requires the preparation and implementation of an Erosion Control Plan. The Erosion Control Plan shall be prepared by a registered professional engineer and include BMPs to minimize siltation, sedimentation, and erosion. After construction is finished, the disturbed areas of the project sites will be developed with ornamental landscaping, which will minimize erosion during rainfall events.

The total project footprint under Alternative D for the Existing PS Site, Ignacio Boulevard Site, and Main Gate Road Site combined would be over once acre. As such, a SWPPP would be required in order to comply with requirements of the federal Construction General Permit, which is required for projects that disturb over one acre of ground. The SWPPP will contain measures to control surface runoff, reduce erosion, and minimize the potential for sediment to leave the project sites and enter waterways during construction activities. The District would be responsible for preparing the SWPPP prior to the start of ground disturbing activities at any project, and the measures contained in the SWPPP would be implemented and enforced throughout project construction. In addition to implementing Mitigation Measure HYDRO-1, the

SWPPP would ensure that the project would not cause substantial erosion or loss of topsoil. The impact would be less than significant with mitigation incorporated.

Alternative E – Less than Significant Impact with Mitigation Incorporated

The C Street Site is located on a private parcel that is currently developed with a baseball field. The Ignacio Boulevard Site is located in an open space area developed with ornamental landscaping. The Existing PS Site is situated in a developed median within Sunset Parkway, which is assumed to be underlain by soils composed of engineered fill (non-native). All sites are located in relatively flat areas, and thus are not highly susceptible to erosion. During construction, activities such as stockpiling, grading, excavation, and earth-disturbing activities would result in loose and disturbed soils on the project sites. Loose and disturbed soils are more prone to erosion and loss of topsoil by wind and water. As described in Section 4.2.10, Hydrology and Water Quality, the District would implement Mitigation Measure HYDRO-1, which requires the preparation and implementation of an Erosion Control Plan. The Erosion Control Plan shall be prepared by a registered professional engineer and include BMPs to minimize siltation, sedimentation, and erosion. After construction is finished, the disturbed areas of the project sites will be developed with ornamental landscaping, which will minimize erosion during rainfall events.

The total project footprint under Alternative E for the Existing PS Site, Ignacio Boulevard Site, and Bolling Drive Site combined would be over once acre. As such, a SWPPP would be required in order to comply with requirements of the federal Construction General Permit, which is required for projects that disturb over one acre of ground. The SWPPP will contain measures to control surface runoff, reduce erosion, and minimize the potential for sediment to leave the project sites and enter waterways during construction activities. The District would be responsible for preparing the SWPPP prior to the start of ground disturbing activities at any project, and the measures contained in the SWPPP would be implemented and enforced throughout project construction. In addition to implementing Mitigation Measure HYDRO-1, the SWPPP would ensure that the project would not cause substantial erosion or loss of topsoil. The impact would be less than significant with mitigation incorporated.

- 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?***

Alternative A – Less than Significant Impact

The Sunset Parkway Site and Existing PS Site are located in developed areas within medians of Sunset Parkway. As described above in Impact a-iii) and a-iv), the sites are situated in relatively flat areas and are not characterized by high landslide or liquefaction potential. The sites are located within medians developed with ornamental landscaping, and therefore it is assumed that the soils underlying the site are non-native and are likely composed of engineered fill. The sites and surrounding areas have already been developed, and therefore the soils units are likely not unstable for the type of development being proposed as part of the project. Prior to the preparation of final design plans, a site-specific geotechnical investigation would be prepared to provide geotechnical design recommendations for the design and construction of the planned PS. The geotechnical investigation would include one exploratory drilling up to approximately 25 feet below the ground surface or until drilling refusal to characterize subsurface materials and confirm the depth of groundwater, laboratory tests on selected soil samples for engineering properties and corrosion potential, and an engineering analysis of the information obtained

during the subsurface exploration program to assess potential for unstable soil or geologic units on the project sites (F&L 2023). The project will adhere to all design recommendations provided in the geotechnical investigation in order to ensure that the project would not be located on an unstable soil or geologic unit. Therefore, the project would not be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project. The impact would be less than significant.

Alternative B – Less than Significant Impact

As described above in Impact a-iii) and a-iv), the Existing PS Site is situated in a relatively flat area and is not characterized by high landslide or liquefaction potential. The Ignacio Boulevard Site is located in a flat area with moderate liquefaction potential. The sites and surrounding areas have already been developed, and therefore the soil units are likely not unstable for the type of development being proposed as part of the project. Prior to the preparation of final design plans, a site-specific geotechnical investigation would be prepared to provide geotechnical design recommendations for the design and construction of the planned PS. The geotechnical investigation would include one exploratory drilling up to approximately 25 feet below the ground surface or until drilling refusal to characterize subsurface materials and confirm the depth of groundwater, laboratory tests on selected soil samples for engineering properties and corrosion potential, and an engineering analysis of the information obtained during the subsurface exploration program to assess potential for unstable soil or geologic units on the project sites (F&L 2023). The project will adhere to all design recommendations provided in the geotechnical investigation in order to ensure that the project would not be located on an unstable soil or geologic unit. Therefore, the project would not be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project. The impact would be less than significant.

Alternative C – Less than Significant Impact

As described above in Impact a-iii) and a-iv), the Existing PS Site is situated in a relatively flat area and is not characterized by high landslide or liquefaction potential. The Bolling Drive Site is situated in a moderately sloped area with very low liquefaction potential (CE&G 2023). The Ignacio Boulevard Site is situated in a flat area with moderate liquefaction potential. The sites and surrounding areas have already been developed, and therefore the soil units are likely not unstable for the type of development being proposed as part of the project. Although shallow sliding of surface soils on or within the vicinity of the Bolling Drive Site is possible, negative impacts to the proposed PS due to landsliding at the site is unlikely (CE&G 2023). Prior to the preparation of final design plans, a site-specific geotechnical investigation would be prepared to provide geotechnical design recommendations for the design and construction of the planned PS. The geotechnical investigation would include one exploratory drilling up to approximately 25 feet below the ground surface or until drilling refusal to characterize subsurface materials and confirm the depth of groundwater, laboratory tests on selected soil samples for engineering properties and corrosion potential, and an engineering analysis of the information obtained during the subsurface exploration program to assess potential for unstable soil or geologic units on the project sites (F&L 2023). The project will adhere to all design recommendations provided in the geotechnical investigation in order to ensure that the project would not be located on an unstable soil or geologic unit. Therefore, the project would not be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project. The impact would be less than significant.

Alternative D - Less than Significant Impact

As described above in Impact a-iii) and a-iv), the Existing PS Site is situated in an area of very low liquefaction potential. The Main Gate Road Site and Ignacio Boulevard Site are situated in relatively areas with moderate liquefaction potential (CE&G 2023; Witter et al. 2006). All sites are located in relatively flat areas and therefore, there is no potential for landsliding to occur on the project sites. The sites and surrounding areas have already been developed, and therefore the soil units are likely not unstable for the type of development being proposed as part of the project. Prior to the preparation of final design plans, a site-specific geotechnical investigation would be prepared to provide geotechnical design recommendations for the design and construction of the planned PS. The geotechnical investigation would include one exploratory drilling up to approximately 25 feet below the ground surface or until drilling refusal to characterize subsurface materials and confirm the depth of groundwater, laboratory tests on selected soil samples for engineering properties and corrosion potential, and an engineering analysis of the information obtained during the subsurface exploration program to assess potential for unstable soil or geologic units on the project sites (F&L 2023). The project will adhere to all design recommendations provided in the geotechnical investigation in order to ensure that the project would not be located on an unstable soil or geologic unit. Therefore, the project would not be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project. The impact would be less than significant.

Alternative E – Less than Significant Impact

As described above in Impact a-iii) and a-iv), the Existing PS Site is situated in an area of very low liquefaction potential. The C Street Site and Ignacio Boulevard Site are situated in areas with moderate liquefaction potential (CE&G 2023; Witter et al. 2006). All sites are located in relatively flat areas and therefore, there is no potential for landsliding to occur on the project sites. The sites and surrounding areas have already been developed, and therefore the soil units are likely not unstable for the type of development being proposed as part of the project. Prior to the preparation of final design plans, a site-specific geotechnical investigation would be prepared to provide geotechnical design recommendations for the design and construction of the planned PS. The geotechnical investigation would include one exploratory drilling up to approximately 25 feet below the ground surface or until drilling refusal to characterize subsurface materials and confirm the depth of groundwater, laboratory tests on selected soil samples for engineering properties and corrosion potential, and an engineering analysis of the information obtained during the subsurface exploration program to assess potential for unstable soil or geologic units on the project sites (F&L 2023). The project will adhere to all design recommendations provided in the geotechnical investigation in order to ensure that the project would not be located on an unstable soil or geologic unit. Therefore, the project would not be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project. The impact would be less than significant.

- d) Be located on expansive soil, as defined in Table 18 1 B of the Uniform Building Code, creating substantial direct or indirect risks to life or property?**

Alternative A – No Impact

Soils with high expansion potential in Novato are mainly found in the Baylands Overlay District, which applies to areas within the historic Baylands, excluding lands that have been filled or developed (City of Novato 2020b). None of the project sites are located within the Baylands Overlay District, and therefore are not known to be underlain by expansive soils (County of Marin

2019). The Sunset Parkway Site and Existing PS Site are underlain by soils of the Xerorthents – Urban land complex. This soil unit is composed of fills and reworked soils associated with developed areas. This unit is not characterized by high potential for expansion or shrink-swell behavior (USDA NRCS 2019). No impact would occur.

Alternative B – No Impact

Soils with high expansion potential in Novato are mainly found in the Baylands Overlay District, which applies to areas within the historic Baylands, excluding lands that have been filled or developed (City of Novato 2020b). None of the project sites are located within the Baylands Overlay District, and therefore are not known to be underlain by expansive soils (County of Marin 2019). The Ignacio Boulevard Site and Existing PS Site are underlain by soils of the Xerorthents – Urban land complex. This soil unit is composed of fills and reworked soils associated with developed areas. This unit is not characterized by high potential for expansion or shrink-swell behavior (USDA NRCS 2019). No impact would occur.

Alternative C – Less than Significant Impact

Soils with high expansion potential in Novato are mainly found in the Baylands Overlay District, which applies to areas within the historic Baylands, excluding lands that have been filled or developed (City of Novato 2020). None of the project sites are located within the Baylands Overlay District, and therefore are not known to be underlain by expansive soils (County of Marin 2019). The Ignacio Boulevard Site and Existing PS Site are underlain by soils of the Xerorthents – Urban land complex. This soil unit is composed of fills and reworked soils associated with developed areas. This unit is not characterized by high potential for expansion or shrink-swell behavior (USDA NRCS 2019). The Bolling Drive Site is underlain by soils of the Saurin-urban land-Bonnydoon complex with 30 to 50 percent slopes. This soil unit has a linear extensibility rating of 4.5 percent, which is considered a moderate expansion potential (USDA NRCS 2019). As described above, development under the proposed project would be required to comply with the CBC, which would ensure that expansive soils are remediated or that foundations and structures are engineered to withstand the forces of expansive soil. Compliance with the requirements of the CBC would reduce this impact to a less than significant level.

Alternative D – No Impact

Soils with high expansion potential in Novato are mainly found in the Baylands Overlay District, which applies to areas within the historic Baylands, excluding lands that have been filled or developed (City of Novato 2020b). None of the project sites are located within the Baylands Overlay District, and therefore are not known to be underlain by expansive soils (County of Marin 2019). The Main Gate Road Site, Ignacio Boulevard Site, and Existing PS Site are underlain by soils of the Xerorthents – Urban land complex. This soil unit is composed of fills and reworked soils associated with developed areas. This unit is not characterized by high potential for expansion or shrink-swell behavior (USDA NRCS 2019). No impact would occur.

Alternative E – No Impact

Soils with high expansion potential in Novato are mainly found in the Baylands Overlay District, which applies to areas within the historic Baylands, excluding lands that have been filled or developed (City of Novato 2020b). None of the project sites are located within the Baylands Overlay District, and therefore are not known to be underlain by expansive soils (County of Marin 2019). The C Street Site, Ignacio Boulevard Site, and Existing PS Site are underlain by soils of the Xerorthents – Urban land complex. This soil unit is composed of fills and reworked soils

associated with developed areas. This unit is not characterized by high potential for expansion or shrink-swell behavior (USDA NRCS 2019). No impact would occur.

e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

Alternatives A through E – No Impact

The project would not include septic tanks or alternative wastewater disposal systems. No impact would occur.

f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Alternative A – Less than Significant Impact with Mitigation Incorporated

Paleontological resources are the fossilized remains of organisms from prehistoric environments found in geologic strata. Project work under Alternative A would include the construction of a new PS at the Sunset Parkway Site and demolition of the Lynwood PS at the Existing PS Site. Both sites are located in already developed and landscaped medians within Sunset Parkway. There is low potential for paleontological resources to occur on these sites as the soils are not native and likely consist of engineered fill. Although it is unlikely that paleontological resources are present on-site, construction activities could result in the disturbance and/or accidental discovery of unknown paleontological resources on the Sunset Parkway Site. Therefore, the project would implement Mitigation Measure CUL-1 to reduce potential impacts to paleontological resources to a less than significant level. The impact would be less than significant with mitigation incorporated.

Alternative B – Less than Significant Impact with Mitigation Incorporated

The project sites are located throughout highly urbanized areas, and there are no known paleontological resources on the sites. The Existing PS Site is located in an already developed median within Sunset Parkway and is assumed to be underlain by non-native soils. Therefore, there is low potential for paleontological resources to occur on the Existing PS Site. The Ignacio Boulevard Site is located in an open space area surrounded by developed areas, and therefore there is low potential for unknown paleontological resources to occur. Although it is unlikely that paleontological resources are present on-site, construction activities could result in the disturbance and/or accidental discovery of unknown paleontological resources on the Ignacio Boulevard Site. The project would implement Mitigation Measure CUL-1 to reduce potential impacts to paleontological resources to a less than significant level. The impact would be less than significant with mitigation incorporated.

Alternative C – Less than Significant with Mitigation Incorporated

The project sites are located throughout highly urbanized areas, and there are no known paleontological resources on the sites. The Existing PS Site is located in an already developed median within Sunset Parkway and is assumed to be underlain by non-native soils. Therefore, there is low potential for paleontological resources to occur on the Existing PS Site. The Ignacio Boulevard Site is located in an open space area surrounded by developed areas, and therefore there is low potential for unknown paleontological resources to occur. The Bolling Drive Site is located in an open space area that is surrounded by undeveloped areas to the east. Although it is unlikely that paleontological resources are present on the Bolling Drive Site and Ignacio

Boulevard Site, construction activities could result in the disturbance and/or accidental discovery of unknown paleontological resources. The project would implement Mitigation Measure CUL-1 to reduce potential impacts to paleontological resources to a less than significant level. The impact would be less than significant with mitigation incorporated.

Alternative D - Less than Significant with Mitigation Incorporated

The project sites are located throughout highly urbanized areas, and there are no known paleontological resources on the sites. The Existing PS Site is located in an already developed median within Sunset Parkway and is assumed to be underlain by non-native soils. Therefore, there is low potential for paleontological resources to occur on the Existing PS Site. The Ignacio Boulevard Site is located in an open space area surrounded by developed areas, and therefore there is low potential for unknown paleontological resources to occur. The Main Gate Road Site is located in an open space area that is surrounded by undeveloped areas to the east and south. Although it is unlikely that paleontological resources are present on the Main Gate Road Site and Ignacio Boulevard Site, construction activities could result in the disturbance and/or accidental discovery of unknown paleontological resources. The project would implement Mitigation Measure CUL-1 to reduce potential impacts to paleontological resources to a less than significant level. The impact would be less than significant with mitigation incorporated.

Alternative E - Less than Significant with Mitigation Incorporated

The project sites are located throughout highly urbanized areas, and there are no known paleontological resources on the sites. The Existing PS Site is located in an already developed median within Sunset Parkway and is assumed to be underlain by non-native soils. Therefore, there is low potential for paleontological resources to occur on the Existing PS Site. The Ignacio Boulevard Site is located in an open space area surrounded by developed areas, and therefore there is low potential for unknown paleontological resources to occur. The C Street Site is located on a publicly owned site that is developed with a baseball field. Although it is unlikely that paleontological resources are present on the C Street Site and Ignacio Boulevard Site, construction activities could result in the disturbance and/or accidental discovery of unknown paleontological resources. The project would implement Mitigation Measure CUL-1 to reduce potential impacts to paleontological resources to a less than significant level. The impact would be less than significant with mitigation incorporated.

CONCLUSION

Under Alternatives A through E, impacts related to geology and soils could be mitigated to a less than significant level with the implementation of mitigation measures. Seismic activity from nearby faults has the potential to impact all project sites, and therefore impacts related to strong seismic ground shaking would be similar under Alternatives A through E. Alternative A would have the least substantial impact related to liquefaction because no project work would occur within an area of moderate or high liquefaction potential. Alternatives B would have a slightly more substantial impact because project work would occur on the Ignacio Boulevard Site, which is situated in an area of high liquefaction potential. Alternatives C, D, and E would have the most substantial impact related to liquefaction because project work would occur on the Ignacio Boulevard Site and either the Bolling Drive Site, Main Gate Road Site, or C Street Site, all of which are located in areas of moderate liquefaction potential. The Bolling Drive Site would have a slightly more substantial impact related to landsliding and expansive soils because there are sloped areas near the site and soils underlying the site have potential for shrink-swell

behavior. Therefore, impacts related to geology and soils would be most substantial under Alternative C; however, the impacts would still be less than significant or less than significant with mitigation.



4.2.8 Greenhouse Gas Emissions

Would the project:		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a)	Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b)	Conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

ENVIRONMENTAL SETTING

Greenhouse gases (GHGs) are recognized by wide consensus among the scientific community to contribute to global warming/climate change and associated environmental impacts. The most common GHGs released from human activity are carbon dioxide, methane, and nitrous oxide (Governor’s Office of Planning and Research 2008). The primary sources of GHGs are vehicles (including planes and trains), energy plants, and industrial and agricultural activities (e.g., dairies and hog farms).

In the United States, the major sources of GHG emissions are transportation, electricity generation, and industrial activities (USEPA 2022). These three sources are also the top contributors of GHG emissions in California (CARB 2022).

REGULATORY BACKGROUND

Global Warming Solutions Act

Assembly Bill (AB) 32, adopted in 2006, established the Global Warming Solutions Act of 2006 which requires the State to reduce GHG emissions to 1990 levels by 2020. In 2016, Senate Bill (SB) 32 was signed into law, amending the California Global Warming Solution Action. SB 32 and Executive Order B-30-15 require CARB to ensure that statewide GHG emissions are reduced to 40 percent below the 1990 level by 2030. CARB updated its Climate Change Scoping Plan in December of 2017 to express the 2030 statewide target in terms of million metric tons of carbon dioxide equivalent (MMTCO_{2e}). Based on the emissions reductions directed by SB 32, the annual 2030 statewide target emissions level for California is 260 MMTCO_{2e}.

Bay Area 2017 Clean Air Plan

The 2017 CAP is the most recently adopted air quality plan in the Bay Area. The CAP focuses on two related BAAQMD goals: protecting public health and protecting the climate. To protect the climate, the CAP includes control measures designed to reduce emissions of methane and other supper-GHGs that are potent climate pollutants in the near-term, and to decrease emissions of carbon dioxide by reducing fossil fuel combustion.

CEQA Air Quality Guidelines

The BAAQMD CEQA Air Quality Guidelines are intended to serve as a guide for those who



prepare or evaluate air quality impact analyses for projects and plans in the San Francisco Bay Area. While the District is exempt from the City of Novato local ordinances with the exception of an Encroachment Permit, the City and other jurisdictions in the San Francisco Bay Area Air Basin utilize the thresholds and methodology for assessing GHG impacts developed by BAAQMD within the CEQA Air Quality Guidelines. The guidelines include information on legal requirements, BAAQMD rules, methods of analyzing impacts, and recommended mitigation measures.

City of Novato General Plan

While the District is exempt from the City of Novato local ordinances with the exception of an Encroachment Permit, the City’s General Plan contains the following relevant policies related to GHG emissions:

Policy ES 24: Emission Reduction Targets. Establish reduction targets for GHG emission and actively implement local strategies to reduce the effects of climate change.

City of Novato Climate Change Action Plan (CCAP)

The City’s CCAP was adopted in December 2009 and is currently in the process of being updated. The CCAP serves as a culmination of an array of all related sustainability initiatives taken by the City and provides a coordinated strategy and direction for all related efforts to follow (City of Novato 2009).

DISCUSSION OF IMPACTS

- a) *Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?*

Alternatives A through E – Less than Significant Impact

The BAAQMD has adopted thresholds of significance that were designed to establish the level at which GHG emissions would cause significant environmental impacts under CEQA. The thresholds are included in the 2022 CEQA Air Quality Guidelines (BAAQMD 2022).

The project would result in GHG emissions from temporary construction-related activities, including operation of heavy equipment, use of trucks, worker trips, site preparation, and trenching. Direct long-term operational emissions would include vehicular traffic during occasional maintenance activities. Indirect emissions would be generated from the electricity required to power the proposed PS.

The BAAQMD does not have an adopted threshold of significance for GHG emissions. The BAAQMD’s approach to developing thresholds of significance for GHG impacts is to use a “fair share” approach to determine whether an individual project’s GHG emissions would be cumulatively considerable. If a project would contribute its “fair share” of what is needed to achieve Statewide long-term GHG reduction goals, the impact of the project’s GHG emission would be less than significant. The BAAQMD has identified required design elements that development and transportation projects must incorporate into project plans in order for their impact to be considered less than significant. There are no design elements required for infrastructure projects, and therefore the project must only be consistent with the local GHG reduction strategy that meets the criteria under State CEQA Guidelines Section 15183.5(b) (BAAQMD 2022). Local GHG reduction plans include the City of Novato’s 2009 CAP. As described below in Impact b), the project would be consistent with GHG reduction strategies identified in

these local plans, and therefore would not constitute a significant impact regarding GHG emissions. The impact from GHG emissions would be less than significant.

- b) *Conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?*

Alternatives A through E – Less than Significant Impact

The project sites fall within the planning jurisdiction of the BAAQMD 2017 CAP, the City’s CCAP, and the City’s General Plan. As discussed in Section 4.2.3, Air Quality, the project under Alternatives A through E would be consistent with applicable control measures from the 2017 CAP. The District is not required to comply with the City’s CCAP or General Plan, and therefore would not conflict with any other applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions. The impact would be less than significant.

CONCLUSION

Under Alternatives A through E, the proposed project would result in less than significant impacts related to the generation of greenhouse gas emissions, either directly or indirectly. Alternative C would have the most substantial impact related to GHG construction emissions. Under Alternatives A through E, the proposed project would result in less than significant impacts related to conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases. The impact would be the same under each Alternative.



4.2.9 Hazards and Hazardous Materials

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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 for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>



ENVIRONMENTAL SETTING

Sunset Parkway Site (Site 1)

A search of the SWRCB's GeoTracker database and the Department of Toxic Substances Control's (DTSC) EnviroStor database indicate that there are no cleanup sites within 0.25 miles of the Sunset Parkway Site (SWRCB 2023, DTSC 2023).

Ignacio Boulevard Site (Site 2)

A search of the SWRCB's GeoTracker database and the DTSC's EnviroStor database indicated that there are no hazardous material cleanup sites within 0.25 miles of the Ignacio Boulevard Site (SWRCB 2023, DTSC 2023).

Bolling Drive Site (Site 3)

A search of the SWRCB's GeoTracker database and the DTSC's EnviroStor database indicated that there are no hazardous material cleanup sites within 0.25 miles of the Bolling Drive Site (SWRCB 2023, DTSC 2023).

Main Gate Road Site (Site 4) and C Street Site (Site 5)

A search of the SWRCB's GeoTracker database and the DTSC's EnviroStor database indicate that there is a hazardous material cleanup site located at 970 C Street, approximately 60 feet north of the Main Gate Road Site and 90 feet west of the C Street Site (SWRCB 2023, DTSC 2023). The three GeoTracker listings for the site at 970 C Street indicate that the site is a former Navy property that was used as a gas station (SWRCB 2023). The EnviroStor listing (80001201) indicates that the site is under land use restrictions per a Land Use Covenant due to the presence of petroleum contamination in the soil and groundwater on-site (DTSC 2023). The Covenant went into effect in April 2005 and limits development of the site to commercial and/or industrial uses. Further, the site owner may not perform any actions which may disturb the soil and groundwater, including dewatering excavations, disturbance of existing groundwater wells, installation of groundwater production wells, or actions which could affect the gasoline constituent groundwater plumes (e.g., construction or creation of groundwater recharge areas, surface impoundments, or disposal trenches), unless conducted in accordance with a Department of the Navy, DTSC, or SWRCB approved work plan (DTSC 2023).

There are three listings for the 970 C Street site in the GeoTracker database (T0609592162, T0609592161, T10000007672). The listings indicate that the site is a former underground storage tank (UST) site that was contaminated with benzene; gasoline; toluene; xylene; and methyl tert-Butyl Ether (MBTE), tertiary butyl alcohol (TBA), and other fuel oxygenates. Investigations including groundwater monitoring, MBTE plume delineation, and soil gas sampling were performed, and remedial actions were taken. In 2016, the Department of the Navy submitted a No Further Action Request for the property; however, the Regional Water Quality Control Board (RWQCB) postponed closure of the site until remediation activities are complete (SWRCB 2023).

Existing PS Site

A search of the SWRCB's GeoTracker database and the Department of Toxic Substances Control's (DTSC) EnviroStor database indicate that there are no cleanup sites within 0.25 miles of the Existing PS Site (SWRCB 2023, DTSC 2023).



REGULATORY BACKGROUND

City of Novato General Plan

While the District is exempt from the City of Novato local ordinances with the exception of an Encroachment Permit, the City's General Plan contains the following relevant policies related to hazards and hazardous materials:

Policy SH 3: Fire Hazards. Reduce the risk of loss of life, personal injury and property damage resulting from wildland and urban fire hazards through code enforcement and coordination with the Novato Fire Protection District.

Policy SH 5: Hazardous Materials. Minimize risks and health impacts from environmental and human-induced disasters.

Policy SH 7: Emergency Management: Minimize exposure to all hazards through emergency management, planning, and training.

DISCUSSION OF IMPACTS

a-b) *Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials? Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?*

Alternatives A through E - Less than Significant Impact

Project construction would involve the use and transport of typical construction-related hazardous materials such as fuels, lubricants, adhesives, and solvents. Heavy equipment would be staged and refueled within the project staging areas. Construction activities would be required to comply with numerous hazardous materials regulations and implement BMPs to ensure that hazardous materials are handled properly and do not pose a threat to worker safety or the environment. Workers handling hazardous materials are required to adhere to all OSHA and Cal/OSHA health and safety requirements. Hazardous materials must be transported to and from the project areas in accordance with the Resource Conservation and Recovery Act (RCRA) and United States Department of Transportation regulations and disposed of in accordance with RCRA at a facility that is permitted to accept the waste. With compliance with existing regulations, the potential impact related to routine transport and accidental releases of hazardous materials would be less than significant.

c) *Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?*

Alternative A – Less than Significant Impact

Lynwood Elementary School is located approximately 230 feet northwest of the Existing PS Site and 420 feet north of the Sunset Parkway Site. As discussed above in Impact a) and b) the proposed project would comply with all applicable regulations related to the handling of hazardous materials which includes proper spill response measures. Adherence with these regulations would ensure that impacts related to hazardous materials near existing schools during construction would be less than significant. Project operation would not introduce a new source of hazardous emissions or hazardous materials near an existing school. The new PS on Sunset Parkway would replace the Lynwood PS and would be further from Lynwood Elementary School. As such, operational conditions would be similar to existing conditions. Occasional

maintenance and repair of the proposed new infrastructure may require the use of hazardous materials; however, these materials would be handled in accordance with all applicable regulations and with the use of BMPs. Therefore, the impact of the proposed project associated with hazardous emissions and hazardous materials within one-quarter mile of an existing school would be less than significant.

Alternative B – Less than Significant Impact

Lynwood Elementary School is located approximately 230 feet northwest of the Existing PS Site, and Pacheco School is located approximately 650 feet north of the Ignacio Boulevard Site. As discussed above in Impact a) and b) the proposed project would comply with all applicable regulations related to the handling of hazardous materials which would include proper spill response measures. Adherence with these regulations would ensure that impacts related to hazardous materials near existing schools during construction would be less than significant.

Pump stations are not typically considered a source of hazardous emissions or hazardous materials, and therefore, project operation would not introduce a new source of hazardous emissions or hazardous materials near an existing school. Occasional maintenance and repair of the proposed new infrastructure may require the use of hazardous materials; however, these materials would be handled in accordance with all applicable regulations and with the use of BMPs. Therefore, the impact of the proposed project associated with hazardous emissions and hazardous materials within one-quarter mile of an existing school would be less than significant.

Alternative C – Less than Significant Impact

Lynwood Elementary School is located approximately 230 feet northwest of the Existing PS Site, and Pacheco School is located approximately 650 feet north of the Ignacio Boulevard Site. The Novato Children’s Center is located approximately 615 feet west of the Bolling Drive Site, and the Hamilton School is located approximately 0.22 miles northwest. As discussed above in Impact a) and b) the proposed project would comply with all applicable regulations related to the handling of hazardous materials which would include proper spill response measures. Adherence with these regulations would ensure that impacts related to hazardous materials near existing schools during construction would be less than significant. In addition, as described in Section 4.2.10, Hydrology and Water Quality, Alternative C would require the preparation of a SWPPP to comply with NPDES General Construction Permit requirements. The SWPPP would contain spill prevention measures and BMPs for handling hazardous materials, which would serve as additional insurance that all hazardous materials would be properly handled during construction and minimize the potential for a spill to occur.

Pump stations are not typically considered a source of hazardous emissions or hazardous materials, and therefore, project operation would not introduce a new source of hazardous emissions or hazardous materials near an existing school. Occasional maintenance and repair of the proposed new infrastructure may require the use of hazardous materials; however, these materials would be handled in accordance with all applicable regulations and with the use of BMPs. Therefore, the impact of the proposed project associated with hazardous emissions and hazardous materials within one-quarter mile of an existing school would be less than significant.

Alternative D – Less than Significant Impact

Lynwood Elementary School is located approximately 230 feet northwest of the Existing PS Site, and Pacheco School is located approximately 650 feet north of the Ignacio Boulevard Site. The Hamilton School is located approximately 590 feet southwest of the Main Gate Road Site, and the Novato Charter School is located approximately 790 feet east. As discussed above in Impact

a) and b) the proposed project would comply with all applicable regulations related to the handling of hazardous materials which would include proper spill response measures. Adherence with these regulations would ensure that impacts related to hazardous materials near existing schools during construction would be less than significant. In addition, as described in Section 4.2.10, Hydrology and Water Quality, Alternative D would require the preparation of a SWPPP to comply with NPDES General Construction Permit requirements. The SWPPP would contain spill prevention measures and BMPs for handling hazardous materials, which would serve as additional insurance that all hazardous materials would be properly handled during construction and minimize the potential for a spill to occur.

Pump stations are not typically considered a source of hazardous emissions or hazardous materials, and therefore, project operation would not introduce a new source of hazardous emissions or hazardous materials near an existing school. Occasional maintenance and repair of the proposed new infrastructure may require the use of hazardous materials; however, these materials would be handled in accordance with all applicable regulations and with the use of BMPs. Therefore, the impact of the proposed project associated with hazardous emissions and hazardous materials within one-quarter mile of an existing school would be less than significant.

Alternative E – Less than Significant Impact

Lynwood Elementary School is located approximately 230 feet northwest of the Existing PS Site, and Pacheco School is located approximately 650 feet north of the Ignacio Boulevard Site. The C Street Site is located on the baseball field that belongs to the Novato Charter School, and the Hamilton School is also located approximately 0.20 miles southwest of the site. As discussed above in Impact a) and b) the proposed project would comply with all applicable regulations related to the handling of hazardous materials which would include proper spill response measures. Adherence with these regulations would ensure that impacts related to hazardous materials near existing schools during construction would be less than significant. In addition, as described in Section 4.2.10, Hydrology and Water Quality, Alternative E would require the preparation of a SWPPP to comply with NPDES General Construction Permit requirements. The SWPPP would contain spill prevention measures and BMPs for handling hazardous materials, which would serve as additional insurance that all hazardous materials would be properly handled during construction and minimize the potential for a spill to occur.

Pump stations are not typically considered a source of hazardous emissions or hazardous materials, and therefore, project operation would not introduce a new source of hazardous emissions or hazardous materials near an existing school. Occasional maintenance and repair of the proposed new infrastructure may require the use of hazardous materials; however, these materials would be handled in accordance with all applicable regulations and with the use of BMPs. Therefore, the impact of the proposed project associated with hazardous emissions and hazardous materials within one-quarter mile of an existing school would be less than significant.

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?*

Alternative A – No Impact

There are no hazardous material cleanup sites located on or within 0.25 miles of the Sunset Parkway Site or Existing PS Site. No impact would occur.

Alternative B – No Impact

There are no hazardous material cleanup sites located on or within 0.25 miles of the Ignacio Boulevard Site or Existing PS Site. No impact would occur.

Alternative C – No Impact

There are no hazardous material cleanup sites located on or within 0.25 miles of the Bolling Drive Site or Existing PS Site. No impact would occur.

Alternative D – Less than Significant Impact

There are no hazardous material cleanup sites located on or within 0.25 miles of the Ignacio Boulevard Site or Existing PS Site. The Main Gate Road Site is located approximately 330 feet west of a hazardous material cleanup site located at 970 C Street. The most recent case update posted on GeoTracker’s website is a letter from the RWQCB to the Navy that indicates that soil vapor for total petroleum hydrocarbons (TPH) was not included in any risk assessments for the cleanup site and was not included in the request for No Further Action letter dated September 2016. Due to the elevated concentrations of TPH at the cleanup site, the RWQCB is concerned about potential vapor intrusion concerns in areas of sensitive populations. The letter states that the RWQCB requests for additional soil vapor monitoring probes, specifically for TPH gas, to be included in the proposed soil vapor extraction workplan to determine if TPH in soil vapor is migrating offsite toward sensitive populations. Depending on the soil vapor data collected, the RWQCB states that it may be necessary for the Navy to develop a workplan to collect and analyze soil vapor to identify the extent of any existing TPH soil vapor plume that may exist within the vicinity of sensitive populations, but outside of the subject site (Beth 2020).

Although there is an active cleanup site approximately 60 feet north of the Main Gate Road Site, there are no known hazardous materials or contamination on the Main Gate Road Site. The site is currently an undeveloped open space area with walking paths, meaning that the site is already occupied by sensitive populations. The project would not substantially exacerbate any contamination issues, if any, on the Main Gate Road Site. The proposed new PS on the Main Gate Road Site would only be occupied occasionally during operation for maintenance activities, and therefore the project would not increase occupancy of the Main Gate Road Site as compared to the existing use. The impact would be less than significant.

Alternative E – Less than Significant Impact

There are no hazardous material cleanup sites located on or within 0.25 miles of the Ignacio Boulevard Site or Existing PS Site. The C Street Site is located approximately 90 feet east of a hazardous material cleanup site located at 970 C Street. The most recent case update posted on GeoTracker’s website is a letter from the RWQCB to the Navy that indicates that soil vapor for total petroleum hydrocarbons (TPH) was not included in any risk assessments for the cleanup site and was not included in the request for No Further Action letter dated September 2016. Due to the elevated concentrations of TPH at the cleanup site, the RWQCB is concerned about potential vapor intrusion concerns in areas of sensitive populations. The letter states that the RWQCB requests for additional soil vapor monitoring probes, specifically for TPH gas, to be included in the proposed soil vapor extraction workplan to determine if TPH in soil vapor is migrating offsite toward sensitive populations. Depending on the soil vapor data collected, the RWQCB states that it may be necessary for the Navy to develop a workplan to collect and analyze soil vapor to identify the extent of any existing TPH soil vapor plume that may exist within the vicinity of sensitive populations, but outside of the subject site (Beth 2020). As of May

2021, remediation documents were being prepared by the current owner of the cleanup site; therefore, it is likely that remediation activities are now underway.

Although there is an active cleanup site approximately 90 feet west of the C Street Site, there are no known hazardous materials or contamination on the C Street Site. The site is currently used as a baseball field for the Novato Charter School, meaning that the site is already occupied by sensitive populations. The project would not substantially exacerbate any contamination issues, if any, on the C Street Site. The proposed new PS on the C Street Site would only be occupied occasionally during operation for maintenance activities, and therefore the project would not increase occupancy of the C Street Site as compared to the existing use. The impact would be less than significant.

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 for people residing or working in the project area?

Alternatives A through E - No Impact

None of the project sites are within the boundaries of an airport land use plan or within two miles of a public or public use airport. The nearest airport is the Gness Field DVO, a domestic airport located at 451 Airport Road. No impact related to airport safety hazards would occur.

f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Alternative A - Less than Significant Impact

The Sunset Parkway Site is situated within a median of a designated emergency evacuation route, whereas the Existing PS Site and staging area on Sunset Parkway are not (Novato Fire District 2023). Temporary delays may occur when vehicles are entering and exiting the Sunset Parkway Site; however, these delays would not cause significant traffic build-up and would not inhibit evacuation in case of emergency. All construction work within the public right-of-way would be consistent with the requirements of the encroachment permit. If lane closure is necessary during construction activities, such as open trenching and pipeline installation, proper traffic controls would be provided to ensure adequate emergency access. Other materials and equipment used during construction would be contained at the staging area on Sunset Parkway, which is not within a designated emergency evacuation route. The project would not impair implementation of or physically interfere with any other adopted emergency response plan or emergency evacuation plan. The impact would be less than significant.

Alternative B - Less than Significant Impact

The Ignacio Boulevard Site and staging area is situated along a designated emergency evacuation route, whereas the Existing PS Site and staging area on Sunset Parkway are not (Novato Fire District 2023). Temporary delays may occur when vehicles are entering and exiting the Ignacio Boulevard Site; however, these delays would not cause significant traffic build-up and would not inhibit evacuation in case of emergency. All construction work within the public right-of-way would be consistent with the requirements of the encroachment permit. If lane closure is necessary during construction activities, such as open trenching and pipeline installation, proper traffic controls would be provided to ensure adequate emergency access. The Ignacio Boulevard Site is not located within the roadway, and therefore, project operation would not result in a significant impact on emergency evacuation along Ignacio Boulevard. The project

would not impair implementation of or physically interfere with any other adopted emergency response plan or emergency evacuation plan. The impact would be less than significant.

Alternative C – Less than Significant Impact

The Ignacio Boulevard Site and staging area and Bolling Drive Site and staging areas are situated along a designated emergency evacuation route, whereas the Existing PS Site and staging area on Sunset Parkway are not (Novato Fire District 2023). Temporary delays may occur when vehicles are entering and exiting the Ignacio Boulevard Site and Bolling Drive Site; however, these delays would not cause significant traffic build-up and would not inhibit evacuation in case of emergency. All construction work within the public right-of-way would be consistent with the requirements of the encroachment permit. If lane closure is necessary during construction activities, such as open trenching and pipeline installation, proper traffic controls would be provided to ensure adequate emergency access. The Ignacio Boulevard Site and Bolling Drive Site are not located within the roadway, and therefore, project operation would not result in a significant impact on emergency evacuation along Ignacio Boulevard, Bolling Drive, or Bolling Circle. The project would not impair implementation of or physically interfere with any other adopted emergency response plan or emergency evacuation plan. The impact would be less than significant.

Alternative D – Less than Significant Impact

The Ignacio Boulevard Site and staging area and Main Gate Road Site and staging area are situated along a designated emergency evacuation route, whereas the Existing PS Site and staging area on Sunset Parkway are not (Novato Fire District 2023). Temporary delays may occur when vehicles are entering and exiting the Ignacio Boulevard Site and Main Gate Road Site; however, these delays would not cause significant traffic build-up and would not inhibit evacuation in case of emergency. All construction work within the public right-of-way would be consistent with the requirements of the encroachment permit. If lane closure is necessary during construction activities, such as open trenching and pipeline installation, proper traffic controls would be provided to ensure adequate emergency access. The Ignacio Boulevard Site and Main Gate Road Site are not located within the roadway, and therefore a significant impact on emergency evacuation along Ignacio Boulevard or Main Gate Road during project operation would not occur. The project would not impair implementation of or physically interfere with any other adopted emergency response plan or emergency evacuation plan. The impact would be less than significant.

Alternative E – Less than Significant Impact

The Ignacio Boulevard Site and staging area and C Street Site and staging area are situated along a designated emergency evacuation route, whereas the Existing PS Site and staging area on Sunset Parkway are not (Novato Fire District 2023). Temporary delays may occur when vehicles are entering and exiting the Ignacio Boulevard Site and C Street Site; however, these delays would not cause significant traffic build-up and would not inhibit evacuation in case of emergency. All construction work within the public right-of-way would be consistent with the requirements of the encroachment permit. If lane closure is necessary during construction activities, such as open trenching and pipeline installation, proper traffic controls would be provided to ensure adequate emergency access. The Ignacio Boulevard Site and C Street Site are not located within the roadway, and therefore a significant impact on emergency evacuation along Ignacio Boulevard, C Street, or Main Gate Road would not occur during project operation. The project would not impair implementation of or physically interfere with any other adopted

emergency response plan or emergency evacuation plan. The impact would be less than significant.

g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

Alternative A – Less than Significant Impact

The Sunset Parkway Site and Existing PS Site are situated within the Wildland Urban Interface (WUI) approximately 0.80 miles southeast of a State Responsibility Area (SRA) High Fire Hazard Severity Zone (FHSZ) (Calfire 2023; City of Novato 2020a). As described in Section 4.2.20, Wildfire, the project would not expose people or structures to significant risks associated with wildland fires. During construction, the project would comply with all applicable requirements related to fire safety and implement BMPs to prevent the uncontrolled spread of wildfire. During operation, the proposed new infrastructure would be contained within the PS building. Any vegetation on the project sites would be maintained to prevent the buildup of dry vegetation. The impact would be less than significant.

Alternative B – Less than Significant Impact

The Ignacio Boulevard Site and Existing PS Site are situated within the WUI approximately 1.30 miles west and 0.80 miles southeast of SRA High FHSZs (City of Novato 2020a; Calfire 2023). As described in Section 4.2.20, Wildfire, the proposed project would not expose people or structures to significant risks associated with wildland fires. During construction, the project would comply with all applicable requirements related to fire safety and implement BMPs to prevent the uncontrolled spread of wildfire. During operation, the proposed new infrastructure would be contained within the PS building. Any vegetation on the project sites would be maintained to prevent the buildup of dry vegetation. The impact would be less than significant.

Alternative C – Less than Significant Impact

The Bolling Drive Site is situated approximately 0.65 miles north of an SRA Moderate FHSZ and approximately 0.60 miles northeast of a High FHSZ (Calfire 2023). The Bolling Drive Site is not situated within the WUI (City of Novato 2020a). The Ignacio Boulevard Site and Existing PS Site are situated within the WUI approximately 1.30 miles west and 0.80 miles southeast of SRA High FHSZs (City of Novato 2020a; Calfire 2023). As described in Section 4.2.20, Wildfire, the proposed project would not expose people or structures to significant risks associated with wildland fires. During construction, the project would comply with all applicable requirements related to fire safety and implement BMPs to prevent the uncontrolled spread of wildfire. During operation, the proposed new infrastructure would be located underground and contained within the PS building. Any vegetation on the project sites would be maintained in accordance with applicable regulations to prevent the buildup of dry vegetation. The impact would be less than significant.

Alternative D – Less than Significant Impact

The Main Gate Road Site is situated approximately 0.40 miles northwest of an SRA Moderate FHSZ (Calfire 2023). The site is not situated within the WUI (City of Novato 2020a). The Ignacio Boulevard Site and Existing PS Site are situated within the WUI approximately 1.30 miles west and 0.80 miles southeast of SRA High FHSZs (City of Novato 2020a; Calfire 2023). As described in Section 4.2.20, Wildfire, the proposed project would not expose people or structures to significant risks associated with wildland fires. During construction, the project would comply with all applicable requirements related to fire safety and implement BMPs to prevent the

uncontrolled spread of wildfire. During operation, the proposed new infrastructure would be contained within the PS building. Any vegetation on the project sites would be maintained to prevent the buildup of dry vegetation. The impact would be less than significant.

Alternative E – Less than Significant Impact

The C Street Site is situated approximately 0.30 miles northwest of an SRA Moderate FHSZ (Calfire 2023). The site is not situated within the WUI (City of Novato 2020a). The Ignacio Boulevard Site and Existing PS Site are situated within the WUI approximately 1.30 miles west and 0.80 miles southeast of SRA High FHSZs (City of Novato 2020a; Calfire 2023). As described in Section 4.2.20, Wildfire, the proposed project would not expose people or structures to significant risks associated with wildland fires. During construction, the project would comply with all applicable requirements related to fire safety and implement BMPs to prevent the uncontrolled spread of wildfire. During operation, the proposed new infrastructure would be contained within the PS building. Any vegetation on the project sites would be maintained to prevent the buildup of dry vegetation. The impact would be less than significant.

CONCLUSION

Under Alternatives A through E, the proposed project would result in less than significant impact related to the creation of a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. Under Alternatives A through E, the proposed project would result in less than significant impact related to the creation of 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. The impact would be the same under each Alternative for each of these topics.

Under Alternatives A through E, the proposed project would result in less than significant impact related to hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. The impact would be the same under each Alternative.

Under Alternatives A through C, the proposed project would result in no impact related to a project being 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. Under Alternatives D and E, the proposed project would result in less than significant impact related to topic.

Under Alternatives A through E, the proposed project would result in no impact related to safety hazard for people residing or working in the project area for sites 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. None of the project sites are within the boundaries of an airport land use plan or within two miles of a public or public use airport. The impact would be the same under each Alternative.

Under Alternatives A through E, the proposed project would result in less than significant impact related to impairing implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. The impact would be the same under each Alternative.

Under Alternatives A through E, the proposed project would result in less than significant impact related to exposure of people or structures, either directly or indirectly, to a significant risk of

loss, injury or death involving wildland fires. The impact would be the same under each Alternative.



4.2.10 Hydrology and Water Quality

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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:				
<i>i) result in substantial erosion or siltation on- or off-site;</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<i>ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<i>iii) create or contribute runoff water that would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff; or</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<i>iv) impede or redirect flood flows?</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

ENVIRONMENTAL SETTING

The City of Novato is bordered by the waters of the San Pablo Bay to the east. The Petaluma River runs about 1.5 miles north of the City and drains to the San Pablo Bay near the unincorporated area of Black Point-Green Point, which borders the City to the northeast. Stafford Lake is located approximately one mile west of the City, which encompasses an 8.3-square-mile watershed (North Marin Water District 2023b).



The project sites are located within the jurisdiction of the San Francisco Bay RWQCB. The San Francisco Bay Region (Region 2) Water Quality Control Plan (Basin Plan) indicates that the project sites are within the SF Bay Central Hydrologic Planning Area (San Francisco Bay RWQCB 2017). The project sites are located within the Novato Valley groundwater subbasin (San Francisco Bay RWQCB 2017).

Sunset Parkway Site (Site 1)

The Sunset Parkway Site is within a median of Sunset Parkway and is not located near any waterways. The staging area on Sunset Parkway is also situated within a median of Sunset Parkway and is approximately 350 feet south of Scottsdale Pond.

Ignacio Boulevard Site (Site 2)

The Ignacio Boulevard Site and staging area are within an open space area approximately 50 feet north of Arroyo San Jose Creek.

Bolling Drive Site (Site 3)

The Bolling Drive Site and staging areas are located in open space and parking lot areas and are not situated near any waterways.

Main Gate Road Site (Site 4)

The Main Gate Road Site and staging area are within an open space area approximately 50 feet east of Pacheco Creek.

C Street Site (Site 5)

The C Street Site and staging area are within a baseball field and are not located near any waterways.

Existing PS Site

The Existing PS Site is within a median of Sunset Parkways and is not located near any waterways. The staging area on Sunset Parkway is also situated within a median of Sunset Parkway and is approximately 350 feet south of Scottsdale Pond.

DISCUSSION OF IMPACTS

a) *Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?*

Alternative A - Less than Significant Impact with Mitigation Incorporated

The Basin Plan sets narrative and numerical water quality objectives for the San Francisco Bay Region. Numerical objectives typically describe pollutant concentration, physical and chemical conditions of water, and the toxicity of water to aquatic organisms. The Existing PS Site and Sunset Parkway Site are not located within a quarter mile of any waterways, and therefore, substantial pollution and sedimentation into nearby waterways would not occur. In addition, Mitigation Measure HYDRO-1 would be implemented, which requires the preparation and implementation of an Erosion Control Plan. Mitigation Measure HYDRO-1 would include BMPs to reduce substantial erosion which could lead to off-site pollution and/or sedimentation of waterways. With the implementation of Mitigation Measure HYDRO-1, the project would not violate any water quality standards or waste discharge requirements. Project operations would not include any activities that would violate water quality standards or waste discharge



requirements or degrade surface or groundwater quality. The impact would be less than significant.

Alternative B – Less than Significant Impact with Mitigation Incorporated

The Existing PS Site is not located within a quarter mile of any waterways, and therefore, direct pollution and sedimentation into nearby waterways would not occur. The Ignacio Boulevard Site is situated adjacent to Arroyo San Jose Creek, and therefore, water runoff from the project site could cause pollution and sedimentation if BMPs are not implemented. The District would implement Mitigation Measure HYDRO-1, which requires the preparation and implementation of an Erosion Control Plan. The Erosion Control Plan shall include BMPs to reduce substantial erosion which could lead to off-site pollution and/or sedimentation of waterways. With the implementation of Mitigation Measure HYDRO-1, the project would not violate any water quality standards or waste discharge requirements. Project operations would not include any activities that would violate water quality standards or waste discharge requirements or degrade surface or groundwater quality. The impact would be less than significant.

Alternative C – Less than Significant Impact with Mitigation Incorporated

The Existing PS Site and Bolling Drive Site are not located within a quarter mile of any waterways, and therefore, direct pollution and sedimentation into nearby waterways would not occur. The Ignacio Boulevard Site is situated adjacent to Arroyo San Jose Creek, and therefore, water runoff from the project site could cause pollution and sedimentation if BMPs are not implemented. The District would implement Mitigation Measure HYDRO-1, which requires the preparation and implementation of an Erosion Control Plan. The Erosion Control Plan shall include BMPs to reduce substantial erosion which could lead to off-site pollution and/or sedimentation of waterways.

The total project footprint under Alternative C for the Existing PS Site, Ignacio Boulevard Site, and Bolling Drive Site combined would be over once acre. As such, a SWPPP would be required in order to comply with requirements of the federal Construction General Permit, which is required for projects that disturb over one acre of ground. The District would be responsible for preparing the SWPPP prior to the start of ground disturbing activities at any project, and the measures contained in the SWPPP would be implemented and enforced throughout project construction. In addition to implementing Mitigation Measure HYDRO-1, the SWPPP would ensure that the project would not violate any water quality standards or waste discharge requirements during construction.

Project operations would not include any activities that would violate water quality standards or waste discharge requirements or degrade surface or groundwater quality. The impact would be less than significant.

Alternative D – Less than Significant Impact with Mitigation Incorporated

The Existing PS Site is not located within a quarter mile of any waterways, and therefore, direct pollution and sedimentation into nearby waterways would not occur. The Ignacio Boulevard Site and Bolling Drive Site are situated within 100 feet of Arroyo San Jose Creek and Pacheco Creek, respectively. Therefore, water runoff from the Ignacio Boulevard Site and Main Gate Road Site could cause pollution and sedimentation if BMPs are not implemented. The District would implement Mitigation Measure HYDRO-1, which requires the preparation and implementation of an Erosion Control Plan. The Erosion Control Plan shall include BMPs to reduce substantial erosion which could lead to off-site pollution and/or sedimentation of waterways. With the

implementation of Mitigation Measure HYDRO-1, the project would not violate any water quality standards or waste discharge requirements.

The total project footprint under Alternative D for the Existing PS Site, Ignacio Boulevard Site, and Main Gate Road Site combined would be over once acre. As such, a SWPPP would be required in order to comply with requirements of the federal Construction General Permit, which is required for projects that disturb over one acre of ground. The District would be responsible for preparing the SWPPP prior to the start of ground disturbing activities at any project, and the measures contained in the SWPPP would be implemented and enforced throughout project construction. In addition to implementing Mitigation Measure HYDRO-1, the SWPPP would ensure that the project would not violate any water quality standards or waste discharge requirements during construction.

Project operations would not include any activities that would violate water quality standards or waste discharge requirements or degrade surface or groundwater quality. The impact would be less than significant.

Alternative E – Less than Significant Impact with Mitigation Incorporated

The Existing PS Site and C Street Site are not located within a quarter mile of any waterways, and therefore, direct pollution and sedimentation into nearby waterways would not occur. The Ignacio Boulevard Site is situated within 100 feet of Arroyo San Jose Creek, and therefore, water runoff from the project site could cause pollution and sedimentation if BMPs are not implemented. The District would implement Mitigation Measure HYDRO-1, which requires the preparation and implementation of an Erosion Control Plan. The Erosion Control Plan shall include BMPs to reduce substantial erosion which could lead to off-site pollution and/or sedimentation of waterways. With the implementation of Mitigation Measure HYDRO-1, the project would not violate any water quality standards or waste discharge requirements.

The total project footprint under Alternative E for the Existing PS Site, Ignacio Boulevard Site, and C Street Site combined would be over once acre. As such, a SWPPP would be required in order to comply with requirements of the federal Construction General Permit, which is required for projects that disturb over one acre of ground. The District would be responsible for preparing the SWPPP prior to the start of ground disturbing activities at any project, and the measures contained in the SWPPP would be implemented and enforced throughout project construction. In addition to implementing Mitigation Measure HYDRO-1, the SWPPP would ensure that the project would not violate any water quality standards or waste discharge requirements during construction.

Project operations would not include any activities that would violate water quality standards or waste discharge requirements or degrade surface or groundwater quality. The impact would be less than significant.

- b) *Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?***

Alternatives A through E – Less than Significant Impact

The project is located within the District's Primary Zone 2 Pressure Zone, which is the largest Zone 2 pressure zone. The primary water source for the District's water supply comes from Sonoma County Water Agency's (SCWA) Russian River Project. The Russian River Project water is

collected 60 to 100 feet below the gravel beds adjacent to the Russian River and is conveyed to the District's Novato Water System via a 7.1-mile-long aqueduct known as the North Marin Aqueduct. Water is diverted and extracted from a stretch of the Russian River located just upstream of Wohler Bridge via six radial wells known as "Ranney collectors." Although the water extracted via Ranney collectors does percolate through the ground, due to the connection to the surface water source, this diversion is considered and is permitted as a surface water supply under existing surface water rights to the Russian River and Dry Creek water (North Marin Water District 2021). The SCWA's water supply also includes a relatively small amount of groundwater from groundwater supply wells located in the central Santa Rosa Plain subbasin. The primary water supply from SCWA is supplemented by the Stafford Treatment Plant, which pulls water from Stafford Lake (F&L 2023).

The purpose of the proposed project is to replace the existing Lynwood PS that serves Primary Zone 2 in order to meet anticipated future demands. While the project would result in increased capacity of water infrastructure, the project would not cause increased demand for water resources. Future development within the City may result in increased demand for groundwater resources from the SCWA's water supply, which the project would help to convey; however, these anticipated demands are accounted for in the District's and SCWA's Urban Water Management Plan (UWMP). The project would not include substantial increases in impervious surface areas, and therefore would not substantially impair groundwater recharge. The impact of the project related to groundwater supplies and groundwater recharge would be less than significant.

- 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: (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 that would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff; or (iv) impede or redirect flood flows?***

Alternative A – Less than Significant Impact

The Sunset Parkway Site and Existing PS Site are situated in medians within Sunset Parkway. The project sites are both relatively flat and surrounded by impervious surface areas of the roadway. The Sunset Parkway Site is currently developed with ornamental landscaping, and the Existing PS Site is developed with the Lynwood PS. The project would not substantially increase impervious surface areas on the two sites, and would not alter drainage patterns as the sites are situated within flat roadway medians. Demolition of the Lynwood PS on the Existing PS Site would not result in alterations of drainage patterns as there would not be a substantial increase in impervious surface area on the site. As such, the project would not result in substantial erosion or siltation, increase the rate or amount of surface runoff, or impede or redirect flood flows due to significant alterations in drainage patterns. The impact would be less than significant.

Alternative B – Less than Significant Impact

The Ignacio Boulevard Site is situated within a flat, landscaped open space area. The Existing PS Site is situated within a flat median of Sunset Parkway and is developed with the Lynwood PS. The construction of a new PS at the Ignacio Boulevard Site would not substantially increase

impervious surface area or alter drainage patterns because 1) the site is flat, and 2) the majority of new infrastructure constructed would be placed underground. Demolition of the Lynwood PS on the Existing PS Site would not result in alterations of drainage patterns as there would not be a substantial increase in impervious surface area on the site. As such, the project would not result in substantial erosion or siltation, increase the rate or amount of surface runoff, or impede or redirect flood flows due to significant alterations in drainage patterns. The impact would be less than significant.

Alternative C – Less than Significant Impact

The Bolling Drive Site is situated within a landscaped open area surrounded by sloped open space areas to the east and Bolling Circle to the west. The Existing PS Site is situated within a flat median of Sunset Parkway and is developed with the Lynwood PS. The Ignacio Boulevard Site is situated within a flat, landscaped open space area. The construction of a new PS at the Ignacio Boulevard Site would not substantially increase impervious surface area or alter drainage patterns because 1) the site is flat, and 2) the majority of new infrastructure constructed would be placed underground. The construction of a new PS at the Bolling Drive Site would not substantially increase impervious surface area or alter drainage patterns because the majority of new infrastructure constructed would be placed underground and the sitework would not substantially alter the slope grade of the site or obstruct existing drainage patterns. Demolition of the Lynwood PS on the Existing PS Site would not result in alterations of drainage patterns as there would not be a substantial increase in impervious surface area on the site. As such, the project would not result in substantial erosion or siltation, increase the rate or amount of surface runoff, or impede or redirect flood flows due to significant alterations in drainage patterns. The impact would be less than significant.

Alternative D – Less than Significant Impact

The Main Gate Road Site is situated within a relatively flat open space area near Pacheco Creek. The Ignacio Boulevard Site is situated within a flat, landscaped open space area. The Existing PS Site is situated within a flat median of Sunset Parkway and is developed with the Lynwood PS. The construction of a new PS at the Ignacio Boulevard Site would not substantially increase impervious surface area or alter drainage patterns because 1) the site is flat, and 2) the majority of new infrastructure constructed would be placed underground. The construction of a new PS at the Main Gate Road Site would not substantially increase impervious surface area or alter drainage patterns because 1) the site is flat, and 2) the majority of new infrastructure constructed would be placed underground. Demolition of the Lynwood PS on the Existing PS Site would not result in alterations of drainage patterns as there would not be a substantial increase in impervious surface area on the site. As such, the project would not result in substantial erosion or siltation, increase the rate or amount of surface runoff, or impede or redirect flood flows due to significant alterations in drainage patterns. The impact would be less than significant.

Alternative E – Less than Significant Impact

The C Street Site is situated within a flat baseball field. The Ignacio Boulevard Site is situated within a flat, landscaped open space area. The Existing PS Site is situated within a flat median of Sunset Parkway and is developed with the Lynwood PS. The construction of a new PS at the Ignacio Boulevard Site would not substantially increase impervious surface area or alter drainage patterns because 1) the site is flat, and 2) the majority of new infrastructure constructed would be placed underground. The construction of a new PS at the C Street Site would not substantially increase impervious surface area or alter drainage patterns because 1) the site is flat, and 2) the



majority of new infrastructure constructed would be placed underground. Demolition of the Lynwood PS on the Existing PS Site would not result in alterations of drainage patterns as there would not be a substantial increase in impervious surface area on the site. As such, the project would not result in substantial erosion or siltation, increase the rate or amount of surface runoff, or impede or redirect flood flows due to significant alterations in drainage patterns. The impact would be less than significant.

d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

Alternative A – Less than Significant Impact

None of the project sites are located in a tsunami or seiche hazard zone (CDC 2023). The Sunset Parkway Site and Existing PS Site are not located in a flood zone hazard area (Federal Emergency Management Agency [FEMA] 2023). The staging area on Sunset Parkway is located in a Zone AE flood zone, which means that the area is subject to inundation by the one percent annual chance flood event (FEMA 2023). No construction work would occur within the staging area, it would only be used to store equipment and materials. Therefore, the staging of materials at the staging area on Sunset Parkway would not risk release of pollutants due to inundation. The impact would be less than significant.

Alternative B – Less than Significant Impact

None of the project sites are located in a tsunami or seiche hazard zone (CDC 2023). The Ignacio Boulevard Site, staging area, and Existing PS Site are not located in a flood zone hazard area (FEMA 2023). The staging area on Sunset Parkway is located in a Zone AE flood zone, which means that the area is subject to inundation by the one percent annual chance flood event (FEMA 2023). No construction work would occur within the staging area, it would only be used to store equipment and materials. Therefore, the staging of materials at the staging area on Sunset Parkway would not risk release of pollutants due to inundation. The impact would be less than significant.

Alternative C – Less than Significant Impact

None of the project sites are located in a tsunami or seiche hazard zone (CDC 2023). The Bolling Drive Site and staging areas, Ignacio Boulevard Site and staging area, and Existing PS Site are not located in a flood zone hazard area (FEMA 2023). The staging area on Sunset Parkway is located in a Zone AE flood zone, which means that the area is subject to inundation by the one percent annual chance flood event (FEMA 2023). No construction work would occur within the staging area, it would only be used to store equipment and materials. Therefore, the staging of materials at the staging area on Sunset Parkway would not risk release of pollutants due to inundation. The impact would be less than significant.

Alternative D – Less than Significant Impact with Mitigation Incorporated

None of the project sites are located in a tsunami or seiche hazard zone (CDC 2023). The Ignacio Boulevard Site, staging area, and Existing PS Site are not located in a flood zone hazard area (FEMA 2023). The Main Gate Road Site and staging area on Sunset Parkway are located in a Zone AE flood zone, which means that the area is subject to inundation by the one percent annual chance flood event (FEMA 2023). No construction work would occur within the staging area, it would only be used to store equipment and materials. Therefore, the staging of materials at the staging area on Sunset Parkway would not risk release of pollutants due to inundation.

Under Alternative D, a new PS would be constructed at the Main Gate Road Site within the Flood Zone AE, which represents a one percent annual chance of flooding from Pacheco Creek. Mitigation Measure HYDRO-1, which requires the preparation and implementation of an Erosion Control Plan, would ensure that erosion and sediment runoff control measures are implemented at the Main Gate Road Site, which would reduce the potential for inundation of the project site to result in sediment pollution into waterways. In addition, the project contractor would comply with all federal OSHA and Cal/OSHA requirements related to construction worker safety, including proper handling of hazardous materials such as fuels, lubricants, adhesives, and solvents. Proper handling of materials under these regulations would ensure that inundation of the project site would not result in pollution of waterways by hazardous materials. With implementation of Mitigation Measure HYDRO-1 and compliance with OSHA and Cal/OSHA regulations, inundation of the Main Gate Road Site during construction would not risk release of pollutants into waterways.

Large volumes of rainwater and/or inundation from flooding can cause damage to pumps, and therefore, should Alternative D be selected, the new PS at the Main Gate Road Site would be designed to protect the pumps and any electrical components from water-caused damage. As the new PS would be for conveying water, rather than wastewater, the risk of pollutant release due to flood inundation is dismissible. The impact of the proposed project related to pollutant release due to inundation would be less than significant with mitigation incorporated.

Alternative E – Less than Significant Impact

None of the project sites are located in a tsunami or seiche hazard zone (CDC 2023). The C Street Site and staging area, Ignacio Boulevard Site and staging area, and Existing PS Site are not located in a flood zone hazard area (FEMA 2023). The staging area on Sunset Parkway is located in a Zone AE flood zone, which means that the area is subject to inundation by the one percent annual chance flood event. As such, project activities during construction at the staging site on Sunset Parkway could risk the release of pollutants from construction equipment and materials due to inundation.

- e) *Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?*

Alternatives A through E - No Impact

The District's 2020 UWMP states that "because the District does not directly pump groundwater, it does not coordinate with any Groundwater Sustainability Agencies" (North Marin Water District 2020). The project sites are located within the Novato Valley groundwater subbasin, which is monitored by the County's Groundwater Elevation Monitoring Program. The Novato Valley subbasin is designated as a low priority basin by the Sustainable Groundwater Management Act, and therefore a Groundwater Sustainability Plan is not required for the subbasin (California Department of Water Resources 2023). Therefore, the project would not conflict with any sustainable groundwater management plan.

The applicable water quality control plan is the Basin Plan. As discussed in Impact a), the project would not violate any water quality standards or waste discharge requirements established in the Basin Plan. Therefore, the project would not conflict with any applicable water quality control plan.

The project would not conflict with any applicable water quality control plan or sustainable groundwater management plan. No impact would occur.

MITIGATION MEASURES

Mitigation Measure HYDRO-1: Erosion Control Plan

Prior to beginning any ground-disturbing work on the project sites, the District shall prepare an Erosion Control Plan to be implemented throughout construction. The Erosion Control Plan shall be prepared by a registered professional engineer and include BMPs to minimize siltation, sedimentation, and erosion. The Plan may include measures such as erosion control fencing, covering any loose soil on-site, and replanting graded areas with vegetation. The District shall be responsible for ensuring that the Erosion Control Plan is implemented throughout construction activities.

CONCLUSION

Under Alternatives A through E, the proposed project would result in less than significant impacts after mitigation related to potential violation of any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality. While Alternatives C through E require a SWPPP in addition to compliance with Mitigation Measure HYDRO-1, the impact would be similar between each of the Alternatives.

Under Alternatives A through E, the proposed project would result in less than significant impacts related to the potential to decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin. This impact would be similar between each of the Alternatives.

Under Alternatives A through E, the proposed project would result in less than significant impacts related to the potential to 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. This impact would be similar between each of the Alternatives.

Under Alternatives A, B, C, and E, the proposed project would result in less than significant impacts related to flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation. The impact would be similar between each of these Alternatives. Under Alternative D, a new PS would be constructed at the Main Gate Road Site within the Flood Zone AE, which represents a one percent annual chance of flooding from Pacheco Creek. Mitigation Measure HYDRO-1, which requires the preparation and implementation of an Erosion Control Plan, would ensure that erosion and sediment runoff control measures are implemented at the Main Gate Road Site, which would reduce the potential for inundation of the project site to result in sediment pollution into waterways.

Under Alternatives A through E, the proposed project would result in no impact related to potential a water quality control plan or sustainable groundwater management plan. The impact would be the same under each Alternative.



4.2.11 Land Use and Planning

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

ENVIRONMENTAL SETTING

Sunset Parkway Site (Site 1)

The Sunset Parkway Site is within the R1-7.5 (Low Density Residential) zoning district and is designated for Low Density Residential development per the City’s General Plan (City of Novato “Map GP-1 Land Use”; City of Novato 2001).

Ignacio Boulevard Site (Site 2)

The Ignacio Boulevard Site is within the PD (Planned District) zoning district and is designated for Open Space development per the City’s General Plan (City of Novato “Map GP-1 Land Use”; City of Novato 2001).

Bolling Drive Site (Site 3)

The Bolling Drive Site is within the PD (Planned District) zoning district and is designated for Medium Density Residential Development per the City’s General Plan (City of Novato “Map GP-1 Land Use”; City of Novato 2001).

Main Gate Road Site (Site 4)

The Main Gate Road Site is within the CF (Community Facilities) zoning district and is designated for Community Facilities, Public Utilities, and Civic Uses development per the City’s General Plan (City of Novato “Map GP-1 Land Use”; City of Novato 2001).

C Street Site (Site 5)

The C Street Site is within the PD (Planned District) zoning district and is designated for Community Facilities, Public Utilities, and Civic Uses development per the City’s General Plan (City of Novato “Map GP-1 Land Use”; City of Novato 2001).

Existing PS Site

The Existing PS Site is within the R1-7.5 (Low Density Residential) zoning district and is designated for Low Density Residential development per the City’s General Plan (City of Novato “Map GP-1 Land Use”; City of Novato 2001).



DISCUSSION OF IMPACTS

a) *Physically divide an established community?*

Alternatives A through E - No Impact

All project sites are located throughout urbanized areas of the City of Novato. The construction of PS under each project alternative would not cause the physical division of an established community. Project construction activities would require space for staging areas in designated areas near the project sites. However, access to residences, public facilities, and recreational facilities would be maintained throughout construction. New infrastructure constructed as part of the project would fit into the surrounding environment and would not cause physical division of any established community. No impact would occur.

b) *Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?*

Alternatives A through E - No Impact

The project sites span across multiple land use designations as specified by the City of Novato General Plan and zoning code. While the District is exempt from the City of Novato local ordinances with the exception of an Encroachment Permit, the project would not conflict with any land use designation, plan, policy, or regulation in the adopted for the purpose of avoiding or mitigating an environmental effect. No impact would occur.

CONCLUSION

Under Alternatives A through E, the proposed project would have no impact related to land use, and no mitigation measures would be required. The impact would be the same under each Alternative.



4.2.12 Mineral Resources

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

ENVIRONMENTAL SETTING

The City’s General Plan states that the primary extractive resources around the Novato area are sand and gravel. The California Geological Survey has designated four Resource Sectors in the Novato area in the Rush Creek Open Space preserve, the Black Point area, Burdell Mountain, and Bowman Canyon (City of Novato 2020a).

DISCUSSION OF IMPACTS

a-b) 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? 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?

Alternatives A through E - No Impact

Online maps prepared by the DOC indicate that there are no mineral lands, mineral sites, or mines in the City of Novato (California DOC 2022b). The City’s General Plan identifies locally important mineral resources; however, the project sites are not located near these resources. Therefore, the project would not result in the loss of availability of a known mineral resource site that would be of value to the State or local area. No impact would occur.

CONCLUSION

Under Alternatives A through E, the proposed project would have no impact related to mineral resources, and no mitigation measures would be required. The impact would be the same under each Alternative.

4.2.13 Noise

Would the project result in:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) For a project located 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

BACKGROUND INFORMATION

Noise is commonly defined as unwanted sound that annoys or disturbs people and can have an adverse psychological or physiological effect on human health. Sound is measured in decibels (dB), which is a logarithmic scale. Decibels describe the purely physical intensity of sound based on changes in air pressure, but they cannot accurately describe sound as perceived by the human ear since the human ear is only capable of hearing sound within a limited frequency range. For this reason, a frequency-dependent weighting system is used, and monitoring results are reported in A-weighted decibels (dBA). Decibels and other acoustical terms are defined in Table 13.

A typical method for determining a person’s subjective reaction to a new noise is by comparing it to existing conditions. The following describes the general effects of noise on people: 1) a change of 1 dBA cannot typically be perceived except in carefully controlled laboratory experiments; 2) a 3-dBA change is considered a just-perceivable difference; 3) a minimum of 5-dBA change is required before any noticeable change in community response is expected; and 4) a 10-dBA change is subjectively perceived as approximately a doubling or halving in loudness.

Table 13. Definition of Acoustical Terms

TERM	DEFINITION
Frequency (Hz)	The number of complete pressure fluctuations per second above and below atmospheric pressure.
Decibel (dB)	A unit describing the amplitude of sound on a logarithmic scale. Sound described in decibels is usually referred to as sound or noise “level.” This



	unit is not used in this analysis because it includes frequencies that the human ear cannot detect.
A-Weighted Sound Level (dBA)	The sound pressure level in decibels as measured on a sound level meter using the A-weighting filter network. The A-weighting filter de-emphasizes the very low and very high frequency components of the sound, in a manner similar to the frequency response of the human ear, and correlates well with subjective reactions to noise. All sound levels in this report are A-weighted.
Maximum Sound Levels (Lmax)	The maximum sound level measured during a given measurement period.
Equivalent Noise Level (Leq)	The average A-weighted noise level during the measurement period. For this CEQA evaluation, Leq refers to a 1-hour period unless otherwise stated.
Community Noise Equivalent Level (CNEL)	The average A-weighted noise level during a 24-hour day, obtained after addition of 5 decibels to sound levels during the evening from 7:00 to 10:00 p.m. and after addition of 10 decibels to sound levels during the night between 10:00 p.m. and 7:00 a.m.
Day/Night Noise Level (Ldn)	The average A-weighted noise level during a 24-hour day, obtained after addition of 10 decibels to sound levels during the night between 10:00 p.m. and 7:00 a.m.
Ambient Noise Level	The existing level of environmental noise at a given location from all sources near and far.
Vibration Decibel (VdB)	A unit describing the amplitude of vibration on a logarithmic scale.
Peak Particle Velocity (PPV)	The maximum instantaneous peak of a vibration signal.
Root Mean Square (RMS) Velocity	The average of the squared amplitude of a vibration signal.

Sources:

Charles M. Salter Associates, Inc., 1998. Acoustics – Architecture, Engineering, the Environment, William Stout Publishers.

Federal Transit Administration, 2018. Transit Noise and Vibration Impact Assessment Manual, FTA Report No.0123, September.

Traffic noise levels are often expressed in terms of the hourly dBA. The noise levels generated by vehicular sources mainly depend on traffic volume, the speed, and the percent of trucks within the fleet. Increases in these three factors will lead to higher noise levels. Doubling the number of sources, such as traffic volume, increases the noise level by approximately 3 dBA due to the logarithmic nature of noise levels.

In an unconfined space, such as outdoors, noise attenuates with distance. Noise levels at a known distance from point sources are reduced by 6 dBA for every doubling of that distance for hard surfaces (e.g., asphalt) and by 7.5 dBA for every doubling of distance for soft surfaces (e.g., vegetative areas).

Vibration is an oscillatory motion through a solid medium in which the motion’s amplitude can be described in terms of displacement, velocity, or acceleration. Typically, groundborne vibration generated by man-made activities attenuates rapidly with distance from the source of the vibration. Vibration amplitudes are usually expressed as either peak particle velocity (PPV) or

the root mean square (RMS) velocity. The PPV is defined as the maximum instantaneous peak of the vibration signal. PPV is appropriate for evaluating potential damage to buildings, but it is not suitable for evaluating human response to vibration because it takes the human body time to respond to vibration signals. The response of the human body to vibration is dependent on the average amplitude of a vibration. The RMS of a signal is the average of the squared amplitude of the signal and is more appropriate for evaluating human response to vibration. PPV is normally described in units of inches per second (in/sec) and RMS is often described in vibration decibels (VdB).

ENVIRONMENTAL SETTING

Sensitive Receptors

Noise-sensitive land uses typically include residences, motels and hotels, schools, libraries, houses of worship, hospitals, convalescent homes, and parks and outdoor recreation areas.

Existing sensitive land uses in the vicinity of each alternative site location are listed below for each Alternative.

Sunset Parkway Site (Site 1)

Residences to the north, west, south, and east as close as 40 feet and the Lynwood Elementary School about 580 feet to the north of Site 1. Residences surround the Existing PS Site as close as 42 feet; and, residences along Sunset Parkway as close as 40 feet to the proposed pipe improvements.

Ignacio Boulevard Site (Site 2)

Residences to the north, west, south, and east of Site 2 as close as 140 feet; and residences along Fairway Drive, Ignacio Boulevard, and Entrada Drive as close as 45 feet to the proposed pipe improvements.

Bolling Drive Site (Site 3)

Residences to the west, east, and south as close as 95 feet; North Bay Children's Center, Tinker Way School Age Program about 585 feet to the north; the Novato Children's Center about 650 feet to the northwest; and, the Hamilton Meadow Park School about 880 feet to the northwest. The playground within the Clark A Blasdel Park is located about 300 feet north of Site 3. Residences along Bolling Drive, Bolling Circle, Randolph Drive, and Main Gate Road as close as 40 feet to the proposed pipe improvements.

Main Gate Road Site (Site 4)

Residences to the east, south, and northwest as close as 155 feet; the Hamilton Meadow Park School about 300 feet to the southwest; the Novato Charter School about 375 feet to the northeast; the North Bay Children Center, C Street about 480 feet to the northeast; the South Novato Library about 750 feet to the northeast; the Wonder Nook Preschool about 690 feet to the north; the North Bay Children's Center, Tinker Way School Age Program about 950 feet to the south; and, the Espino C Family Child Care about 975 feet to the east of Site 4. Residences along Main Gate Road as close as 50 feet to the proposed pipe improvements.

C Street Site (Site 5)

Residences to the east, south, and northwest as close as 105 feet; the Hamilton Meadow Park School about 630 feet to the southwest; the Novato Charter School about 200 feet to the north;

the North Bay Children Center, C Street about 330 feet to the north; the South Novato Library about 625 feet to the north; the Wonder Nook Preschool about 880 feet to the northwest; the North Bay Children's Center, Tinker Way School Age Program about 980 feet to the south; and, the Espino C Family Child Care about 670 feet to the southeast of Site 5. Residences along Main Gate Road as close as 105 feet to the proposed pipe improvements.

Existing Ambient Noise Conditions

Traffic along nearby roadways is the primary source of noise surrounding the proposed alternative site locations. The existing noise environment in the vicinity of each alternative site location was characterized through an ambient noise monitoring survey conducted from December 14 to December 15, 2023. The survey consisted of three long-term (24-hour) measurements (LT-1 through LT-3) and one short-term (15-minute) measurement (ST-1). The noise measurement locations are illustrated in Figure F1, Appendix F.

The existing noise environments near Site 1 through Site 3 are represented by LT-1 through LT-3, while Site 4 and Site 5 are represented by ST-1. Sound level measurements were conducted using Type 1 sound level meters with slow response and “A” weighting. The noise monitoring equipment for the long-term measurements were installed on trees at 9 feet to 10.5 feet above ground level, while the short-term measurement was collected using a tripod at 4.5 feet above ground level. The microphones were protected from the effects of wind noises. The noise meters were field calibrated immediately prior to use. Ambient noise measurement locations, monitoring periods, and corresponding results are summarized in Table 14.

Table 14. Summary of Existing Noise Level Measurements

SITE ID	LOCATION	MONITORING PERIOD	NOISE LEVEL
LT-1	Sunset Parkway median between Monte Maria Avenue and Cambridge Street	From 10:51 AM 12/14/2023 to 11:18 AM 12/15/2023	63.3 dBA, CNEL
LT-2	About 450 feet east to the intersection of eastbound Ignacio Boulevard and Palmer Drive	From 10:16 AM 12/14/2023 to 10:16 AM 12/15/2023	66.1 dBA, CNEL
LT-3	Adjacent to the intersection of Bolling Circle and Crissy Place to the east	From 8:46 AM 12/14/2023 to 8:46 AM 12/15/2023	60.2 dBA, CNEL
ST-1	Northwest corner of the intersection of Main Gate Road and C Street	From 9:14 AM 12/14/2023 to 9:29 AM 12/14/2023	63.4 dBA, Leq

Source: Appendix F.

REGULATORY SETTING

Federal Transit Administration

The Federal Transit Administration (FTA) has developed a general construction noise threshold of 90 dBA Leq at the nearest noise-sensitive receptor. According to the FTA, if the combined noise level in 1 hour from the two noisiest pieces of equipment exceeds the 90 dBA threshold at a residential land use (or other noise-sensitive receptors), then there may be a substantial adverse reaction.



The FTA has developed vibration thresholds to prevent disturbances to (i.e., annoyance of) building occupants based on the frequency of a vibration event.⁷ Vibrations that are equal to or exceed the vibration thresholds could result in potential disturbance to people or activities. The FTA thresholds of 80 VdB and 83 VdB are used in this analysis to evaluate disturbance to residences and buildings where people normally sleep and to institutional land uses with primarily daytime use (such as schools), respectively.

California Department of Transportation

The California Department of Transportation (Caltrans) has developed vibration thresholds based on PPV values to evaluate the potential impact of construction vibration on structures.⁸ Construction vibrations that are equal to or exceed the vibration thresholds could result in potential damage to structures. For frequent intermittent vibratory sources during construction (e.g., vibratory compaction equipment), Caltrans recommends a threshold of 0.3 in/sec for older residential structures.

City of Novato Noise Ordinance

While the District is exempt from the City of Novato local ordinances with the exception of an Encroachment Permit, City of Novato Municipal Code Division 19.22.070 establishes performance standards for allowable exterior noise levels based on land use, as shown in Table 15. In accordance with Division 19.22.070.A, uses, activities, and processes shall not generate or emit any noise or sound in excess of the levels provided in Table 15 beyond the property line of the parcel on which they are located. According to Division 19.22.070.B, the performance standards do not apply to authorized construction activities that occur between 7 a.m. and 6 p.m. on weekdays, or between 10 a.m. and 5 p.m. on Saturdays.

Table 15. City of Novato Municipal Code Allowable Exterior Noise Levels

TYPE OF LAND USE	ALLOWABLE EXTERIOR LEVELS ¹	
	Time Interval	Maximum Noise Level ²
Residential ³	10 p.m. to 6 a.m.	45 dBA
	6 a.m. to 10 p.m.	60 dBA
Commercial ⁴	10 p.m. to 6 a.m.	60 dBA
	6 a.m. to 10 p.m.	70 dBA
Industrial or Manufacturing ⁴	Anytime	70 dBA

Notes:

¹ Each of the noise limits specified shall be reduced by 5 dBA for impulse or simple tone noises. If the ambient noise exceeds the resulting standard, the ambient shall be the standard.

² Maximum noise levels shall not be exceeded for an aggregate period of more than three minutes within a one-hour time period or by more than 20 dBA at any time.

³ Residential standards apply to sensitive receptors such as schools, hospitals, libraries, group care facilities, and convalescent homes. These uses may require special mitigation.

⁴ Commercial standards apply to Mixed Use Districts.

⁷ Federal Transit Administration (FTA), 2018. Transit Noise and Vibration Impact Assessment Manual, FTA Report No.0123, September.

⁸ California Department of Transportation (Caltrans), 2020. Transportation and Construction Vibration Guidance Manual.



ASSESSMENT METHODOLOGY

While the District is exempt from the City of Novato local ordinances with the exception of an Encroachment Permit, the project would comply with construction hours established in City of Novato Municipal Code and therefore would be exempt from the performance standards presented in Table 15. To evaluate potential impacts to nearby noise-sensitive receptors during construction, the FTA's noise threshold of 90 dBA Leq is used in this analysis.

For construction vibration, the Caltrans threshold of 0.3 in/sec for older residential buildings is used to evaluate potential structural impacts at nearby sensitive receptors. The FTA thresholds of 80 VdB and 83 VdB are used in this analysis to evaluate disturbance to residences and buildings where people normally sleep and to institutional land uses with primarily daytime use (such as schools), respectively.

The performance standards established in the City of Novato Municipal Code Division 19.22.070, as presented in Table 15, are not directly applicable to the project because some of the alternative site locations are within the City right of way, which is not representative of a typical land-use parcel boundary. If the alternative site locations were within a typical parcel boundary, then project noise levels could be compared to the 70 dBA threshold for an industrial land use in accordance with the Municipal Code. However, because the proposed alternative site locations are generally surrounded by residential land uses, the noise levels thresholds for residential land uses were applied in this analysis to evaluate the potential noise impacts at those receiving land uses. Because the ambient noise levels in the vicinity of the proposed alternative site locations, as presented in Table 14, exceed the standards for residential land use listed in Table 15, the ambient noise levels are used as the receiving land-use threshold for operational noise in accordance with City of Novato Municipal Code Division 19.22.070.

DISCUSSION OF IMPACTS

- a) ***Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?***

Alternatives A through E - Less than Significant Impact

Construction Noise

The primary source of noise during construction would be off-road equipment activities on the project site. Construction noise levels would vary from day-to-day, depending on the number and type of equipment being used, the types and duration of activity being performed, the distance between the noise source and the receptor, and the presence or absence of barriers, if any, between the noise source and receptor. Pile driving, which can generate extreme levels of noise, is not proposed as part of the project.

The construction of the project is anticipated to begin in 2025 and would last for approximately 17 months for Alternatives A and B, and for approximately 28 months for Alternatives C through E. The types of construction equipment that would be used for the project were provided by the District (Appendix F). In accordance with guidance from FTA, daytime construction noise impacts were evaluated by quantifying the maximum noise levels that would result from the simultaneous operation of the two noisiest pieces of equipment near the perimeter of the project site closest to a sensitive receptor. Detailed calculations are provided in Appendix F.



As shown in Table 16, the project’s construction noise levels were estimated at the nearest noise sensitive receptor for each construction phase for each proposed alternative site location. As shown in Table 16, for Alternatives A through E, project construction would not generate noise levels that could potentially exceed the FTA 90 dBA Leq noise threshold at the nearby noise sensitive receptors, and this impact would be less than significant for Alternatives A through E.

Table 16. Potential Noise Impacts from Project Construction (dBA Leq)

CONSTRUCTION PHASE	SITE 1 (ALTERNATIVE A)	SITE 2 (ALTERNATIVES B THROUGH E)	SITE 3 (ALTERNATIVE C)	SITE 4 (ALTERNATIVE D)	SITE 5 (ALTERNATIVE E)
Existing Pump Station Removal	85	85	85	85	85
Pavement Removal for New Pipe	86	85	86	84	78
Trench Excavation and Pipe Construction	84	83	84	82	76
Asphalt Pavement of Road	86	85	86	84	78
New Pump Station Construction	83	73	76	72	75
Exceed the 90 dBA Threshold?	No	No	No	No	No

Source: Detailed calculations are provided in Appendix F.

Operational Noise

The primary source of noise during project operation would be the pumps within the new pump station. Alternative A would include four pumps at Site 1. Alternative B would include four pumps at Site 2. Alternatives C through E would include three pumps at Site 2, and two pumps at Sites 3 through 5. For each Alternative, the pumps would be hosted in an enclosed building structure. Standard building structures can provide an average of 20 dBA attenuation with windows closed. The noise levels generated by the pumps at each proposed alternative site location and at the corresponding nearest receptor were estimated and presented in Table 17. Detailed calculations are provided in Appendix F. As shown in Table 17, for Alternatives A through E, project operation would not generate noise levels that could potentially exceed the applicable noise thresholds at the nearby noise sensitive receptors, and this impact would be less than significant for Alternatives A through E.

Table 17. Potential Noise Impacts from Project Operation (dBA Leq)

ALTERNATIVE	NUMBER OF PUMPS	NOISE LEVELS AT NEAREST RECEPTOR ¹	ALLOWABLE MAXIMUM EXTERIOR NOISE LEVELS ²	EXCEED THRESHOLD?
Site 1 (Alternative A)	4	59	63.3	No
Site 2	4	48	66.1	No



(Alternatives B through E)				
Site 3 (Alternative C)	2	51	60.2	No
Site 4 (Alternative D)	2	57	63.4	No
Site 5 (Alternative E)	2	50	63.4	No

Notes:

¹ The noise levels presented include a 20 dBA reduction in noise levels due to the enclosed building structure.

² Measured ambient noise levels at the proposed alternative site locations were used as performance standards in accordance with City of Novato Municipal Code Division 19.22.070.

Source: Detailed calculations are provided in Appendix F.

b) Generation of excessive groundborne vibration or groundborne noise levels?

Alternatives A through E- Less than Significant Impact

Construction can result in varying degrees of ground vibration depending on the type of equipment and activity. The primary types of equipment that could generate substantial ground vibration during project construction and the associated vibration calculations are included in Appendix F. To evaluate the project’s potential vibration effects on nearby sensitive receptors, a buffer distance that would be needed to avoid exceeding the FTA and Caltrans construction vibration thresholds listed above was estimated for each type of equipment. It was conservatively assumed that the equipment that could generate substantial ground vibration would be used near the project boundaries for each proposed alternative site location. The estimated buffer distances for potential disturbance and building damage are summarized in Table 18. Reference vibration levels and related calculations are included in Appendix F.

Table 18. Buffer Distances for Potential Vibration Impacts from Project Construction Equipment

EQUIPMENT	BUFFER DISTANCE FOR POTENTIAL VIBRATION IMPACTS (FEET)	
	Human Disturbance Impacts ¹	Building Damage Impacts ²
Vibratory Roller	58	20
Loaded Trucks	31	10

Notes:

¹ The FTA thresholds of 83 VdB for institutional land uses from infrequent construction events was used to calculate the buffer distances from construction equipment.

² To be conservative, the Caltrans vibration threshold of 0.3 in/sec for older residential structures was used to calculate the buffer distances from construction equipment.

Source: Detailed calculations are provided in Appendix F.

As shown in Table 18, the construction equipment that would require the largest buffer distance to avoid generating vibration levels that could disturb institutional land uses with primarily daytime use is the vibratory roller. Vibration from a vibratory roller could exceed the 83 VdB threshold at institutional land uses located within 58 feet. As described above under *Sensitive Receptors*, the institutional land uses identified for each proposed alternative site location are located outside of the 58 feet buffer distance. Therefore, construction activities would not generate excessive vibration levels that could potentially disturb normal school operations. As nighttime work is not anticipated, vibration annoyance impacts on people within residential buildings related to nighttime construction would not occur. Therefore, for Alternatives A through

E, construction activities would not be expected to generate excessive vibration levels that would disturb nearby residents and institutional land uses, and this impact would be less than significant for Alternatives A through E.

As shown in Table 18, vibration from a vibratory roller could exceed the 0.3 in/sec PPV threshold for potential structural impacts to older residential buildings located within 20 feet. As described above under *Sensitive Receptors*, all receptors near the proposed alternative site locations and proposed pipe improvements would be located outside of the 20-foot buffer where a vibratory roller could exceed the 0.3 in/sec PPV threshold. Therefore, for Alternatives A through E, construction activities would not generate excessive vibration levels with the potential to damage adjacent buildings, and this impact would be less than significant for Alternatives A through E.

c) *For a project located 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?*

Alternatives A through E – No Impact

The proposed alternative site locations are not located within the vicinity of a private airstrip or an airport land use plan, or within 2 miles of a public airport or public-use airport. The Marin County Gness Field Airport is located about 3.8 miles to the north of Site 1, and the San Rafael Airport is located about 2.3 miles to the south of Site 3. Therefore, the project would have no impact related to the exposure of people to excess noise levels from aircraft noise.

Conclusion

Under Alternatives A through E, the impact of the proposed project related to construction and operational noise would be less than significant. Alternative A would have the most substantial impact related to construction and operational noise. Under Alternatives A through E, the impact of the proposed project related to groundborne vibration and groundborne noise levels would be less than significant. Impacts of the proposed project related to the exposure of people to excess noise levels from aircraft noise would be the same for Alternatives A through E which would be no impact.



4.2.14 Population and Housing

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Induce substantial unplanned 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)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

DISCUSSION OF IMPACTS

- a) Induce substantial unplanned 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)?**

Alternatives A through E - Less than Significant Impact

The proposed project would not induce substantial population growth in an area, either directly or indirectly. The purpose of the project is to replace the existing Lynwood PS to accommodate demand associated with projected future growth within the service area. In other words, the project is a proactive approach to accommodate projected demand associated with future growth that has been estimated by the City’s Cycle Six Housing Element Update. The project itself would not extend infrastructure in a manner that would encourage or promote population growth in an area outside of what has been estimated by the City’s Cycle Six Housing Element Update. Therefore, the project’s impact related to population growth would be less than significant.

- b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?**

Alternatives A through E - No Impact

The project would not displace any persons or housing and would not necessitate the construction of replacement housing elsewhere. No impact would occur.

CONCLUSION

Under Alternatives A through E, the proposed project would have a less than significant impact regarding population and housing, and no mitigation measures would be required. The impact would be the same under each Alternative.



4.2.15 Public Services

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) 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 public services:				
<i>Fire protection?</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<i>Police protection?</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<i>Schools?</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<i>Parks?</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<i>Other public facilities?</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

ENVIRONMENTAL SETTING

Sunset Parkway Site (Site 1)

Lynwood Elementary School is located approximately 420 feet north of the Sunset Parkway Site and 560 feet west of the staging area on Sunset Parkway. Lynwood Hill Park is located approximately 0.25 miles southeast of the Sunset Parkway Site.

Ignacio Boulevard Site (Site 2)

Pacheco School is located approximately 650 feet north of the Ignacio Boulevard Site. The Ignacio Boulevard Site is located in an open space area along Arroyo San Jose Creek that is developed with a pedestrian and bicyclist path.

Bolling Drive Site (Site 3)

Novato Fire Station 65 is located approximately 110 feet south of the Bolling Drive Site and staging area adjacent to the site. The southern Bolling Drive Site staging area is located in the parking lot for Novato Fire Station 65. The Novato Children’s Center is located approximately 615 feet west of the Bolling Drive Site, and the Hamilton School is located approximately 0.22 miles northwest. Clark A Blasdel Park is located approximately 340 feet northeast of the Bolling Drive Site.

Main Gate Road Site (Site 4)

The Hamilton School is located approximately 590 feet southwest of the Main Gate Road Site, and the Novato Charter School is located approximately 790 feet east.

C Street Site (Site 5)

The C Street Site is located on the baseball field that belongs to the Novato Charter School, and the Hamilton School is also located approximately 0.20 miles southwest of the site.



Existing PS Site

Lynwood Elementary School is located approximately 230 feet northwest of the Existing PS Site and 560 feet west of the staging area on Sunset Parkway. Lynwood Hill Park is located approximately 0.20 miles southeast of the Sunset Parkway Site.

DISCUSSION OF IMPACTS

a) ***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 public services:***

- ***Fire Protection?***
- ***Police Protection?***
- ***Schools?***
- ***Parks?***
- ***Other Public Facilities?***

Alternatives A through E – No Impact

As described in Section 4.2.14, Population and Housing, the project would not induce population growth outside of what has been estimated by the City's Cycle Six Housing Element Update. As such, the project would not result in the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts. The project would not include the provision of any new or physically altered governmental facilities. Therefore, no impact would occur.

CONCLUSION

Under Alternatives A through E, the proposed project would have no impact related to public services, and no mitigation measures would be required. The impact would be the same under each Alternative.



4.2.16 Recreation

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

ENVIRONMENTAL SETTING

Sunset Parkway Site (Site 1)

Lynwood Hill Park is located approximately 0.25 miles southeast of the Sunset Parkway Site.

Ignacio Boulevard Site (Site 2)

The Ignacio Boulevard Site is located in an open space area along Arroyo San Jose Creek that is developed with a pedestrian and bicyclist path.

Bolling Drive Site (Site 3)

The Bolling Drive Site is located within an open space area with hiking trails. Clark A Blasdel Park is located approximately 340 feet northeast of the Bolling Drive Site.

Main Gate Road Site (Site 4)

A baseball field for the Hamilton School is located approximately 250 feet west of the Main Gate Road Site.

C Street Site (Site 5)

The C Street Site is located in a baseball field that belongs to the Novato Charter School.

Existing PS Site

Lynwood Hill Park is located approximately 0.20 miles southeast of the Existing PS Site.

DISCUSSION OF IMPACTS

- a) ***Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?***

Alternatives A through E – No Impact

As discussed in Section 4.2.14, Population and Housing, the project would not cause substantial population growth outside of what has been estimated by the City’s Cycle Six Housing Element Update. Therefore the project would not 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. No impact would occur.

b) *Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?*

Alternatives A through E – No Impact

The project would not include any recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment. No impact would occur.

CONCLUSION

Under Alternatives A through E, the proposed project would have no impact related to recreation and no mitigation measures would be required. The impact would be the same under each Alternative.



4.2.17 Transportation

Would the project:		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a)	Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b)	Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c)	Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d)	Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

ENVIRONMENTAL SETTING

Sunset Parkway Site (Site 1)

The Sunset Parkway Site is situated within a median of Sunset Parkway between its intersection with Cambridge Street and Monte Maria Avenue. Sunset Parkway is a two-lane road separated by medians from its intersection with Cambridge Street northeast towards where the road ends past its intersection with Greenwood Drive. The staging area on Sunset Parkway is situated within a median at the end of Sunset Parkway just past Greenwood Drive. Street parking is available on both sides of Sunset Parkway.

Ignacio Boulevard Site (Site 2)

The Ignacio Boulevard Site is situated in an open space area adjacent to Ignacio Boulevard at the southeastern corner of its intersection with Palmer Drive. Ignacio Boulevard is a four-lane roadway separated by landscaped medians. The intersection at Ignacio Boulevard and Palmer drive is stoplight controlled. No on-street parking is available along Ignacio Boulevard in the project site area; however, a bike lane is present on both sides of Ignacio Boulevard.

Bolling Drive Site (Site 3)

The Bolling Drive Site is situated in an open space area adjacent to Bolling Circle just north of its intersection with Bolling Drive. Bolling Drive and Bolling Circle are both two-lane roadways. The Bolling Drive Site southern staging area is situated within the parking lot for the Novato Fire Station 65. The intersection at Bolling Drive and Bolling Circle is moderate by all way stop signs.

Main Gate Road Site (Site 4)

The Main Gate Road Site is situated in an open space area adjacent to the southern side of Main Gate Road. Main Gate Road is a two-lane road separated by landscaped medians in the area of the project site. No on-street parking is available along Main Gate Road and no bike lanes are present. Sidewalks are present along both sides of the road.



C Street Site (Site 5)

The C Street Site is situated in a baseball field at the northeastern corner of the intersection of Main Gate Road and C Street. Main Gate Road is a two-lane road separated by landscaped medians in the area of the project site. No on-street parking is available along Main Gate Road and no bike lanes are present. Sidewalks are present along both sides of the road. C Street is a two-lane road with no sidewalks or bike lanes. The intersection of C Street and Main Gate Road is moderated by a single stop sign at the C Street exit onto Main Gate Road.

Existing PS Site

The Existing PS Site is situated within a median of Sunset Parkway between its intersection with South Novato Boulevard and Lynwood Drive. Sunset Parkway is a two-lane road separated by medians from its intersection with Cambridge Street northeast towards where the road ends past its intersection with Greenwood Drive. The staging area on Sunset Parkway is situated within a median at the end of Sunset Parkway just past Greenwood Drive. Street parking is available on both sides of Sunset Parkway.

REGULATORY BACKGROUND

City of Novato General Plan

While the District is exempt from the City of Novato local ordinances with the exception of an Encroachment Permit, the City's General Plan contains the following relevant policies related to transportation:

Policy MO 1: Level of Service Standards. Establish traffic Level of Service (LOS) standards as follows for use in evaluating the impacts of proposed development projects so the project can be redesigned or effective mitigation measures can be implemented, making improvements to the roadway system, and determining appropriate traffic impact fees. Continue to consider LOS standards in evaluating the merits of proposed development or traffic infrastructure projects in addition to consideration of standards associated with Vehicle Miles Traveled (VMT) in the required environmental review process.

Acceptable LOS standards for intersections in the City are:

- a. At intersections with signals or four-way stop signs: operation at LOS D, and
- b. At intersections with stop signs on side streets only: operation at LOS E.

Policy MO 6: Through Traffic on Existing Local Streets. Reduce through traffic on existing local streets, as needed and feasible, to preserve the peace and quiet of residential areas. Slow traffic through traffic calming techniques where advisable and feasible.

DISCUSSION OF IMPACTS

- a) ***Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?***

Alternative A – Less than Significant Impact

The City's General Plan is the only applicable plan addressing the circulation system. The City maintains LOS standards for intersections including intersections with signals or four-way stop signs must operate at LOS D or higher, and intersections with stop signs on side streets only



must operate at LOS E or higher. The intersection of Sunset Parkway and Monte Maria Avenue near the Sunset Parkway Site is controlled with stop signs on side streets only and therefore must operate at LOS E or above. The intersection of Sunset Parkway and Cambridge Street near the Sunset Parkway Site is controlled by four-way stop signs and therefore must operate at LOS D or above. The intersection of Sunset Parkway and South Novato Boulevard near the Existing PS Site is signal controlled and must operate at LOS D or above. The intersection of Sunset Parkway and Lynwood Drive near the Existing PS Site is controlled by stop signs on side streets only and must operate at LOS E or above.

As described in Section 3.0, Project Description, Alternative A would require approximately 2,238 worker commute trips and 37 vendor trips over the entire 17-month construction duration. A total of 106 demolition haul trips and 112 import haul trips for soil, aggregate, and concrete would be required. Workers would park along nearby streets and construction equipment would be staged either within the project sites or within the staging area on Sunset Parkway. The most trips are anticipated to occur in April 2025, in which 266 total trips for workers, vendors, and import and export would be required. Assuming 22 working days in April of 2025, this would constitute an average of 12 trips per day. Twelve trips per day would not cause a significant impact on existing LOS at intersections in the project area, and therefore the project would not conflict with the City's LOS standards defined by the General Plan. The District is also exempt from the City of Novato local ordinances with the exception of an Encroachment Permit. Furthermore, construction equipment and vehicles would park along nearby streets in designated parking areas, or within the project site or staging area. No vehicles would occupy unauthorized parking spaces within Sunset Parkway or any nearby roadways, and therefore the project would not generate delays which would cause significant traffic. The impact would be less than significant.

Alternative B - Less than Significant Impact

The intersection of Sunset Parkway and South Novato Boulevard near the Existing PS Site is signal controlled and must operate at LOS D or above. The intersection of Sunset Parkway and Lynwood Drive near the Existing PS Site is controlled by stop signs on side streets only and must operate at LOS E or above. The intersection of Ignacio Boulevard and Palmer Drive near the Ignacio Boulevard Site is signal controlled and must operate at LOS D or above.

As described in Section 3.0, Project Description, Alternative B would require approximately 2,652 worker commute trips and 54 vendor trips over the entire 17-month construction duration. A total of 309 demolition haul trips and 283 import haul trips for soil, aggregate, and concrete would be required. Workers would park along nearby streets and construction equipment would be staged either within the project sites or within the staging areas. The most trips are anticipated to occur in April 2025, in which 410 total trips for workers, vendors, and import and export would be required. Assuming 22 working days in April of 2025, this would constitute an average of 19 trips per day. However, these trips would be split between two areas near the Ignacio Boulevard Site and Existing PS Site. Considering a conservative estimate that 75 percent of trips would occur in either area, a total of 14 additional trips per day would occur in either project site area. Fourteen trips per day would not cause a significant impact on existing LOS at intersections in the project areas, and therefore the project would not conflict with the City's LOS standards defined by the General Plan. The District is also exempt from the City of Novato local ordinances with the exception of an Encroachment Permit. Furthermore, construction equipment and vehicles would park along nearby streets in designated parking areas, or within the project sites or staging areas. No vehicles would occupy unauthorized parking spaces within Sunset

Parkway, Ignacio Boulevard, or any nearby roadways, and therefore the project would not generate delays which would cause significant traffic. The impact would be less than significant.

Alternative C - Less than Significant Impact

The intersection of Sunset Parkway and South Novato Boulevard near the Existing PS Site is signal controlled and must operate at LOS D or above. The intersection of Sunset Parkway and Lynwood Drive near the Existing PS Site is controlled by stop signs on side streets only and must operate at LOS E or above. The intersection of Ignacio Boulevard and Palmer Drive near the Ignacio Boulevard Site is signal controlled and must operate at LOS D or above. The intersection of Bolling Circle and Bolling Drive near the Bolling Drive Site is controlled by all-way stop signs and is required to operate at LOS D or above.

As described in Section 3.0, Project Description, Alternative C would require approximately 3,968 worker commute trips and 97 vendor trips over the entire 25-month construction duration. A total of 535 demolition haul trips and 504 import haul trips for soil, aggregate, and concrete would be required. The most trips are anticipated to occur in March 2025, in which 484 total trips for workers, vendors, and import and export would be required. Assuming 21 working days in March of 2025, this would constitute an average of 23 trips per day. However, these trips would be split between three areas near the Bolling Drive Site, Ignacio Boulevard Site, and Existing PS Site. Considering a conservative estimate that 50 percent of trips would occur in any project area, a total of 12 additional trips per day would occur in either project site area. Twelve trips per day would not cause a significant impact on existing LOS at intersections in the project areas, and therefore the project would not conflict with the City's LOS standards defined by the General Plan. The District is also exempt from the City of Novato local ordinances with the exception of an Encroachment Permit. Furthermore, construction equipment and vehicles would park along nearby streets in designated parking areas, or within the project sites or staging areas. No vehicles would occupy unauthorized parking spaces within Sunset Parkway, Ignacio Boulevard, Bolling Circle, or any nearby roadways, and therefore the project would not generate delays which would cause significant traffic. The impact would be less than significant.

Alternative D - Less than Significant Impact

The intersection of Sunset Parkway and South Novato Boulevard near the Existing PS Site is signal controlled and must operate at LOS D or above. The intersection of Sunset Parkway and Lynwood Drive near the Existing PS Site is controlled by stop signs on side streets only and must operate at LOS E or above. The intersection of Ignacio Boulevard and Palmer Drive near the Ignacio Boulevard Site is signal controlled and must operate at LOS D or above. The nearest intersection to the Main Gate Road Site is the intersection of Main Gate Road and C Street, which is stop controlled on side streets only, and therefore must operate at LOS E or above.

As described in Section 3.0, Project Description, Alternative D would require approximately 3,712 worker commute trips and 80 vendor trips would be required over the entire 25-month construction duration. A total of 353 demolition haul trips and 342 import haul trips for soil, aggregate, and concrete would be required. The most trips are anticipated to occur in March 2025, in which 465 total trips for workers, vendors, and import and export would be required. Assuming 21 working days in March of 2025, this would constitute an average of 22 trips per day. However, these trips would be split between three areas near the Main Gate Road Site, Ignacio Boulevard Site, and Existing PS Site. Considering a conservative estimate that 50 percent of trips would occur in any project area, a total of 11 additional trips per day would occur in either project site area. Eleven trips per day would not cause a significant impact on existing LOS at intersections in the project areas, and therefore the project would not conflict with the

City's LOS standards defined by the General Plan. The District is also exempt from the City of Novato local ordinances with the exception of an Encroachment Permit. Furthermore, construction equipment and vehicles would park along nearby streets in designated parking areas, or within the project sites or staging areas. No vehicles would occupy unauthorized parking spaces within Sunset Parkway, Ignacio Boulevard, Main Gate Road, or any nearby roadways, and therefore the project would not generate delays which would cause significant traffic. The impact would be less than significant.

Alternative E – Less than Significant Impact

The intersection of Sunset Parkway and South Novato Boulevard near the Existing PS Site is signal controlled and must operate at LOS D or above. The intersection of Sunset Parkway and Lynwood Drive near the Existing PS Site is controlled by stop signs on side streets only and must operate at LOS E or above. The intersection of Ignacio Boulevard and Palmer Drive near the Ignacio Boulevard Site is signal controlled and must operate at LOS D or above. The intersection of Main Gate Road and C Street is stop controlled on side streets only, and therefore must operate at LOS E or above.

As described in Section 3.0, Project Description, Alternative E would require approximately 3,688 worker commute trips and 80 vendor trips over the entire 25-month construction duration. A total of 328 demolition haul trips and 318 import haul trips for soil, aggregate, and concrete would be required. The most trips are anticipated to occur in March 2025, in which 461 total trips for workers, vendors, and import and export would be required. Assuming 21 working days in March of 2025, this would constitute an average of 22 trips per day. However, these trips would be split between three areas near the C Street Site, Ignacio Boulevard Site, and Existing PS Site. Considering a conservative estimate that 50 percent of trips would occur in any project area, a total of 11 additional trips per day would occur in either project site area. Eleven trips per day would not cause a significant impact on existing LOS at intersections in the project areas, and therefore the project would not conflict with the City's LOS standards defined by the General Plan. The District is also exempt from the City of Novato local ordinances with the exception of an Encroachment Permit. Furthermore, construction equipment and vehicles would park along nearby streets in designated parking areas, or within the project sites or staging areas. No vehicles would occupy unauthorized parking spaces within Sunset Parkway, Ignacio Boulevard, C Street, or any nearby roadways, and therefore the project would not generate delays which would cause significant traffic. The impact would be less than significant.

b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

Alternative A - Less than Significant Impact

In accordance with the *Technical Advisory on Evaluating Transportation Impacts in CEQA*, Section 21099 of the PRC states that the criteria for determining the significance of transportation impacts must promote: (1) reduction of GHG emissions; (2) development of multimodal transportation networks; and (3) a diversity of land uses. Section 21099 subd. (b)(1) further directed the Office of Planning and Research (OPR) to prepare and develop criteria for determining significance. The OPR identifies a screening threshold for small, land use projects as a project that generates or attracts fewer than 110 trips per day. Projects that generate fewer than this threshold may be assumed to cause a less-than-significant transportation impact (OPR 2018).

As described above in Impact a), the project would generate a maximum average of 12 trips per day in April 2025. As such, the daily number of vehicle trips associated with the project would

not exceed 110 trips per day, which is the OPR's screening threshold for conducting a VMT analysis. Once constructed, the project would only require occasional maintenance inspection, which would be similar to existing conditions. The project would not conflict with CEQA Guidelines section 15064.3, subdivision (b). The impact would be less than significant.

Alternative B - Less than Significant Impact

As described above in Impact a), the project would generate a maximum average of 19 trips per day in April 2025. As such, the daily number of vehicle trips associated with the project would not exceed 110 trips per day, which is the OPR's screening threshold for conducting a VMT analysis. Once constructed, the project would only require occasional maintenance inspection, which would not generate 110 trips per day. The project would not conflict with CEQA Guidelines section 15064.3, subdivision (b). The impact would be less than significant.

Alternative C - Less than Significant Impact

As described above in Impact a), the project would generate a maximum average of 23 trips per day in March 2025. As such, the daily number of vehicle trips associated with the project would not exceed 110 trips per day, which is the OPR's screening threshold for conducting a VMT analysis. Once constructed, the project would only require occasional maintenance inspection, which would be similar to existing conditions. The project would not conflict with CEQA Guidelines section 15064.3, subdivision (b). The impact would be less than significant.

Alternative D - Less than Significant Impact

As described above in Impact a), the project would generate a maximum average of 22 trips per day in March 2025. As such, the daily number of vehicle trips associated with the project would not exceed 110 trips per day, which is the OPR's screening threshold for conducting a VMT analysis. Once constructed, the project would only require occasional maintenance inspection, which would be similar to existing conditions. The project would not conflict with CEQA Guidelines section 15064.3, subdivision (b). The impact would be less than significant.

Alternative E - Less than Significant Impact

As described above in Impact a), the project would generate a maximum average of 22 trips per day in March 2025. As such, the daily number of vehicle trips associated with the project would not exceed 110 trips per day, which is the OPR's screening threshold for conducting a VMT analysis. Once constructed, the project would only require occasional maintenance inspection, which would be similar to existing conditions. The project would not conflict with CEQA Guidelines section 15064.3, subdivision (b). The impact would be less than significant.

c) *Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?*

Alternatives A through E - Less than Significant Impact

Construction of the proposed project would not increase hazards as all construction work and staging would take place within designated project sites and staging areas. No permanent improvements would occur outside of any median within the public right of way. Temporary construction work and staging of construction equipment consistent with the City's encroachment permit requirements would occur within the public right-of-way. Construction of new infrastructure at any of the project sites would not be incompatible with current land uses of the sites and would not create hazards due to a geometric design feature. Installation of pipeline infrastructure within the public right-of-way would not result in an incompatible use or

geometric design feature because the new infrastructure would be located underground. Therefore, the project would not increase hazards due to a geometric design feature or incompatible use. The impact would be less than significant.

d) Result in inadequate emergency access?

Alternatives A through E – Less than Significant Impact

During construction, all project work and equipment staging would occur within designated project sites and staging areas. All work within the public right-of-way would be consistent with the requirements of the encroachment permit. If lane closure is necessary during construction activities, such as open trenching and pipeline installation, proper traffic controls would be provided to ensure adequate emergency access. Operation of the proposed new infrastructure would not result in inadequate emergency access as the sites are not located within the roadway and do not obstruct any occupied dwellings. Therefore, the project would not result in inadequate emergency access. The impact would be less than significant.

CONCLUSION

Under Alternatives A through E, the project would result in less than significant impacts related to conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities. The impact would be the same under each Alternative. Under Alternatives A through E, the project would result in less than significant impacts related to conflict or inconsistency with CEQA Guidelines section 15064.3, subdivision (b). The impact would be the same under each Alternative. Under Alternatives A through E, the project would result in less than significant impacts related to increased hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment), or inadequate emergency access. The impact would be the same under each Alternative.

4.2.18 Tribal Cultural Resources

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of 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)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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 the 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.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

ENVIRONMENTAL SETTING

A description of the environmental setting related to tribal cultural resources can be found in Section 5.2.5, Cultural Resources.

REGULATORY BACKGROUND

Tribal Cultural Resources Assembly Bill 52 (AB 52)

AB 52 (Chapter 532, Statutes 2014) required an update of the CEQA Guidelines to include questions related to impacts to tribal cultural resources. AB 52 establishes a consultation process with all California Native American Tribes on the Native American Heritage Commission List, Federal and Non-Federal Recognized Tribes. AB 52 also establishes a new class of resources: Tribal Cultural Resources. Key components of AB 52 include consideration of Tribal Cultural Values in determination of project impacts and mitigation, and required Tribal notice and meaningful consultation.

PRC Section 21080.3.2(b) states that consultation ends when either 1) parties agree to mitigation measures or avoid a significant effect on a tribal cultural resource, or 2) a party, acting in good faith and after reasonable effort concludes that mutual agreement cannot be reached.

State of California Public Resources Code

Section 21074 of the PRC defines historical resources related to tribal cultural resources.

- a) “Tribal cultural resources” are either of the following:
 1. Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following:
 - A. Included or determined to be eligible for inclusion in the California Register of Historical Resources.
 - B. Included in a local register of historical resources as defined in subdivision (k) of Section 5020.1.
 2. 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 Section 5024.1. In applying the criteria set forth in subdivision (c) of Section 5024.1 for the purposes of this paragraph, the lead agency shall consider the significance of the resource to a California Native American tribe.
- b) A cultural landscape that meets the criteria of subdivision (a) is a tribal cultural resource to the extent that the landscape is geographically defined in terms of the size and scope of the landscape.
- c) A historical resource described in Section 21084.1, a unique archaeological resource as defined in subdivision (g) of Section 21083.2, or a “nonunique archaeological resource” as defined in subdivision (h) of Section 21083.2 may also be a tribal cultural resource if it conforms with the criteria of subdivision (a).

Section 5020.1(k) defines “Local register of historical resources” as a list of properties officially designated or recognized as historically significant by a local government pursuant to a local ordinance or resolution.

Section 5024.1 is the establishment of the California Register of Historical Resources.

METHODOLOGY

As part of the Cultural Resources Study, Origer sent a request to the NAHC seeking information from the Sacred Lands File and the names of Native American individuals and groups that would be appropriate to contact regarding the proposed project. The NAHC replied with a response dated November 16, 2023, stating that the Sacred Lands File results showed the presence of cultural resources within the township and range of the project sites. The NAHC recommended that the Federated Indians of Graton Rancheria be contacted for additional details. The NAHC also sent a list of Native American tribes to contact for additional information, and letters were sent to the following groups:

- Federated Indians of Graton Rancheria
- Guidiville Indian Rancheria

An email response from Buffy McQuillen, Tribal Historic Preservation Officer for the Federated Indians of Graton Rancheria stated that the project sites are within the Tribe’s ancestral territory and requested the research results and recommendations of the Cultural Resources Study. No

other comments were received as of the date of this IS/MND. Pursuant to AB 52, the District also contacted the Federated Indians of Graton Rancheria and the Guidiville Indian Rancheria to initiate Tribal Resources Consultation. No responses have been received from the tribes as of the date of this IS/MND.

DISCUSSION OF IMPACTS

- a) ***Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of 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)?***
 - 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 the 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.***

Alternative A - Less than Significant Impact with Mitigation Incorporated

The NAHC reported that the Sacred Lands File results showed the presence of cultural resources within the township and range of the project sites. No tribal cultural resources on the Sunset Parkway Site, Existing PS Site, or staging area on Sunset Parkway have been identified by previous cultural resources study or by Native American individuals or groups to date. However, as described in Section 4.2.5, Cultural Resources, ground-disturbing activities during construction may lead to the discovery of buried archaeological resources on the project sites, which may include tribal cultural resources. The project will implement Mitigation Measure CUL-1 pertaining to the accidental discovery of buried archaeological resources, which will ensure that the project will not damage any unknown cultural resources, including tribal cultural resources, that may be present on the project sites.

AB 52 (Chapter 532, Statutes 2014) requires a direct consulting relationship between tribes and the lead agency. The District has initiated Tribal consultation pursuant to AB 52 by sending letters to the Federated Indians of Graton Rancheria and Guidiville Indian Rancheria. The District will follow the five-step process outlined by the NAHC to meet their obligations under AB 52 and CEQA to make a good faith effort to conduct tribal consultation under State guidelines. An overview of this process can be found at https://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf.

Alternative B - Less than Significant Impact with Mitigation Incorporated

The NAHC reported that the Sacred Lands File results showed the presence of cultural resources within the township and range of the project sites. No tribal cultural resources on the Ignacio Boulevard Site and staging area, Existing PS Site, or staging area on Sunset Parkway have been identified by previous cultural resources study or by Native American individuals or groups to

date. However, as described in Section 4.2.5, Cultural Resources, ground-disturbing activities during construction may lead to the discovery of buried archaeological resources on the project sites, which may include tribal cultural resources. The project will implement Mitigation Measure CUL-1 pertaining to the accidental discovery of buried archaeological resources, which will ensure that the project will not damage any unknown cultural resources, including tribal cultural resources, that may be present on the project sites.

AB 52 (Chapter 532, Statutes 2014) requires a direct consulting relationship between tribes and the lead agency. The District has initiated Tribal consultation pursuant to AB 52 by sending letters to the Federated Indians of Graton Rancheria and Guidiville Indian Rancheria. The District will follow the five-step process outlined by the NAHC to meet their obligations under AB 52 and CEQA to make a good faith effort to conduct tribal consultation under State guidelines. An overview of this process can be found at https://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf.

Alternative C – Less than Significant Impact with Mitigation Incorporated

The NAHC reported that the Sacred Lands File results showed the presence of cultural resources within the township and range of the project sites. No tribal cultural resources on the Bolling Drive Site and staging areas, Ignacio Boulevard Site and staging area, Existing PS Site, or staging area on Sunset Parkway have been identified by previous cultural resources study or by Native American individuals or groups to date. However, as described in Section 4.2.5, Cultural Resources, ground-disturbing activities during construction may lead to the discovery of buried archaeological resources on the project sites, which may include tribal cultural resources. The project will implement Mitigation Measure CUL-1 pertaining to the accidental discovery of buried archaeological resources, which will ensure that the project will not damage any unknown cultural resources, including tribal cultural resources, that may be present on the project sites.

AB 52 (Chapter 532, Statutes 2014) requires a direct consulting relationship between tribes and the lead agency. The District has initiated Tribal consultation pursuant to AB 52 by sending letters to the Federated Indians of Graton Rancheria and Guidiville Indian Rancheria. The District will follow the five-step process outlined by the NAHC to meet their obligations under AB 52 and CEQA to make a good faith effort to conduct tribal consultation under State guidelines. An overview of this process can be found at https://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf.

Alternative D – Less than Significant Impact with Mitigation Incorporated

The NAHC reported that the Sacred Lands File results showed the presence of cultural resources within the township and range of the project sites. No tribal cultural resources on the Main Gate Road Site and staging area, Ignacio Boulevard Site and staging area, Existing PS Site, or staging area on Sunset Parkway have been identified by previous cultural resources study or by Native American individuals or groups to date. However, as described in Section 4.2.5, Cultural Resources, ground-disturbing activities during construction may lead to the discovery of buried archaeological resources on the project sites, which may include tribal cultural resources. The project will implement Mitigation Measure CUL-1 pertaining to the accidental discovery of buried archaeological resources, which will ensure that the project will not damage any unknown cultural resources, including tribal cultural resources, that may be present on the project sites. As the Main Gate Road Site was determined to have a high potential for buried archaeological resources, Alternative D would also implement Mitigation Measure CUL-2, which requires that construction crews receive an archaeological training session prior to the commencement of

excavation work, and that an archaeologist who meets the Secretary of the Interiors Standards for Archaeology monitor all excavation work on-site.

AB 52 (Chapter 532, Statutes 2014) requires a direct consulting relationship between tribes and the lead agency. The District has initiated Tribal consultation pursuant to AB 52 by sending letters to the Federated Indians of Graton Rancheria and Guidiville Indian Rancheria. The District will follow the five-step process outlined by the NAHC to meet their obligations under AB 52 and CEQA to make a good faith effort to conduct tribal consultation under State guidelines. An overview of this process can be found at https://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf.

Alternative E – Less than Significant Impact with Mitigation Incorporated

The NAHC reported that the Sacred Lands File results showed the presence of cultural resources within the township and range of the project sites. No tribal cultural resources on the C Street Site and staging area, Ignacio Boulevard Site and staging area, Existing PS Site, or staging area on Sunset Parkway have been identified by previous cultural resources study or by Native American individuals or groups to date. However, as described in Section 4.2.5, Cultural Resources, ground-disturbing activities during construction may lead to the discovery of buried archaeological resources on the project sites, which may include tribal cultural resources. The project will implement Mitigation Measure CUL-1 pertaining to the accidental discovery of buried archaeological resources, which will ensure that the project will not damage any unknown cultural resources, including tribal cultural resources, that may be present on the project sites. As the C Street Site was determined to have a high potential for buried archaeological resources, Alternative D would also implement Mitigation Measure CUL-2, which requires that construction crews receive an archaeological training session prior to the commencement of excavation work, and that an archaeologist who meets the Secretary of the Interiors Standards for Archaeology monitor all excavation work on-site.

AB 52 (Chapter 532, Statutes 2014) requires a direct consulting relationship between tribes and the lead agency. The District has initiated Tribal consultation pursuant to AB 52 by sending letters to the Federated Indians of Graton Rancheria and Guidiville Indian Rancheria. The District will follow the five-step process outlined by the NAHC to meet their obligations under AB 52 and CEQA to make a good faith effort to conduct tribal consultation under State guidelines. An overview of this process can be found at https://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf.

CONCLUSION

Under Alternatives A through E, impacts related to tribal cultural resources could be mitigated to a less-than-significant level with the implementation of mitigation measures. No tribal cultural resources on any of the sites have been identified by previous cultural resources study or by Native American individuals or groups to date.



4.2.19 Utilities and Service Systems

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Result in a determination by the wastewater 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

ENVIRONMENTAL SETTING

Water in the City of Novato is supplied by the District. Drinking water in the City comes from two primary sources: a groundwater aquifer adjacent to the Russian River, and Stafford Lake. Recycled water is used for irrigation and some commercial applications. The District purchases approximately 80 percent of its water supply from the SCWA. The SCWA's water is collected 60 to 100 feet below the gravel beds adjacent to the Russian River and is conveyed to the District's Novato Water System via a 7.1-mile-long aqueduct known as the North Marin Aqueduct (NMA). Approximately 20 percent of the District's water supply comes from Stafford Lake, which is situated about ½ mile outside of the City limits to the northeast.

City of Novato General Plan

While the District is exempt from the City of Novato local ordinances with the exception of an Encroachment Permit, the City of Novato General Plan contains the following policies related to

utilities and service systems:

Policy LU 3: Anticipated Growth. Plan the City’s infrastructure and service levels to provide capacity for the total amount of development expected by 2035 as shown in Table GP-4.

DISCUSSION OF IMPACTS

- 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?**

Alternatives A through E – Less than Significant Impact with Mitigation Incorporated

The proposed project would include the construction of either one or two new PS and associated water pipelines. Potential environmental effects of the proposed new water facilities are discussed throughout this IS/MND. Section 4.2.21, Mandatory Findings of Significance, describes the cumulative impacts of project alternatives. As described throughout this IS/MND, the project would not result in any significant environmental impacts; all impacts would be mitigated to a less than significant level with implementation of mitigation measures described throughout this document. Therefore, the environmental effects of the proposed new water facilities included in the project would be less than significant with mitigation incorporated.

- b) **Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?**

Alternatives A through E – Less than Significant Impact

The District’s 2020 Urban Water Management Plan (UWMP) provides an analysis of the District’s projected and historical water demands, water supplies, supply reliability and potential vulnerabilities, water shortage contingency planning, and demand management programs. The UWMP estimates, taking into account historical water use, expected population increase and other growth, climatic variability, and other assumptions, that potable and raw water demand within the District’s service area is projected to increase to 10.50 acre-feet per year by 2045, which represents an increase of 23 percent compared to the 2016–2020 average. As described above, water supply for the District primarily comes from purchased water from the SCWA’s Russian River Project.

The project is being proposed for the purpose of replacing the Lynwood PS due to its overall poor condition, and to meet projected future demands within the service area that may require the capacity of the existing PS to be increased. The District, as the lead agency, has considered the information contained in the UWMP and has determined that the proposed project is a necessary infrastructure upgrade to continue providing water throughout its service area. The District has considered its water supply reliability in planning future infrastructure upgrades, such as the proposed project, and is responsible for addressing and planning for water supply shortages. The District also updates its Water Shortage Contingency Plan (WSCP) every five years, which aims to mitigate potential water supply deficiencies in dry and multiple dry years. The District is aware of future water demand projections and has determined that the proposed project is necessary to continue providing water to its service area. The District, as the CEQA lead agency, will ensure that there are sufficient water supplies to serve the project and other

reasonably foreseeable future development during normal, dry, and multiple dry years. The impact would be less than significant.

- c) Result in a determination by the wastewater 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?**

Alternatives A through E – No Impact

As discussed in Section 4.2.14, Population and Housing, the project would not cause substantial population growth outside of what has been estimated by the City's Cycle Six Housing Element Update. As such, the project would not impact demand for wastewater treatment during construction or operation. No impact would occur.

- 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?**

Alternatives A through E – Less than Significant Impact

The project would generate construction and demolition (C&D) waste during construction, which would need to be disposed of at a facility that accepts C&D waste. Project operations would not cause a significant increase in solid waste generation. The impact would be less than significant.

- e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?**

Alternatives A through E - Less than Significant Impact

Project construction activities would generate C&D waste from the demolition of the existing Lynwood PS and construction of one or two new PS. The project would comply with all federal, state, and local management and reduction statutes and regulations related to solid waste. C&D waste from project construction would be disposed of in accordance with all federal, state, and local regulations. Therefore, the impact of the project related to solid waste requirements would be less than significant.

CONCLUSION

Under Alternatives A through E, the project would include the construction of new and expanded water infrastructure, the potential environmental impacts of which are discussed throughout this IS/MND. Under Alternatives A through E, impacts related to water supply and wastewater treatment would be similar, and no Alternative would have a less or more substantial impact. Alternatives A and B would generate the least amount of C&D waste as only one new PS would be constructed under those alternatives. The impact related to solid waste would be more substantial under Alternatives C, D, and E because the construction of two new PS would generate more C&D waste; however, the impact would remain less than significant.



4.2.20 Wildfire

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:	<i>Potentially Significant Impact</i>	<i>Less than Significant with Mitigation Incorporated</i>	<i>Less than Significant Impact</i>	<i>No Impact</i>
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

ENVIRONMENTAL SETTING

The project sites are located in a Local Responsibility Area within the City of Novato. The City is generally surrounded by State Responsibility Area (SRA) High Fire Hazard Severity Zones (FHSZ) to the west.

Sunset Parkway Site (Site 1)

The Sunset Parkway Site is situated within the Wildland Urban Interface (WUI) approximately 0.80 miles southwest of an SRA High FHSZ (Calfire 2023; City of Novato 2020a).

Ignacio Boulevard Site (Site 2)

The Ignacio Boulevard Site is situated within the WUI approximately 1.30 miles west of an SRA High FHSZ (City of Novato 2020a; Calfire 2023).

Bolling Drive Site (Site 3)

The Bolling Drive Site is situated approximately 0.65 miles north of an SRA Moderate FHSZ and approximately 0.60 miles northeast of a High FHSZ (Calfire 2023). The site is not situated within the WUI (City of Novato 2020a).

Main Gate Road Site (Site 4)

The Main Gate Road Site is situated approximately 0.40 miles northwest of an SRA Moderate FHSZ (Calfire 2023). The site is not situated within the WUI (City of Novato 2020a).

C Street Site (Site 5)

The C Street Site is situated approximately 0.30 miles northwest of an SRA Moderate FHSZ (Calfire 2023). The site is not situated within the WUI (City of Novato 2020a).

Existing PS Site

The Existing PS Site is situated within the WUI approximately 0.80 miles southwest of an SRA High FHSZ (Calfire 2023; (City of Novato 2020a).

DISCUSSION OF IMPACTS

a) *Substantially impair an adopted emergency response plan or emergency evacuation plan?*

Alternative A – Less than Significant Impact

As discussed in Section 4.2.10, Hazards and Hazardous Materials, the project would not impair implementation of or physically interfere with an adopted emergency response plan or evacuation plan. The Existing PS Site and staging area on Sunset Parkway are not located along a designated evacuation route. The Sunset Parkway Site is situated in a median of Sunset Parkway in a section that is designated as a secondary evacuation route (Marin County 2023). The project would not stage any equipment outside of the project site and staging area, and therefore the project would not obstruct the evacuation route during construction. Operational conditions would be similar to existing conditions because the new PS would be contained within the roadway median. The impact would be less than significant.

Alternative B – Less than Significant Impact

As discussed in Section 4.2.10, Hazards and Hazardous Materials, the project would not impair implementation of or physically interfere with an adopted emergency response plan or evacuation plan. The Existing PS Site and staging area on Sunset Parkway are not located along a designated evacuation route. The Ignacio Boulevard Site is situated in an open space area along Ignacio Boulevard across from its intersection with Palmer Drive. Ignacio Boulevard is a designated primary evacuation route and Palmer Drive is a designated secondary evacuation route (Marin County 2023). The project would not stage any equipment outside of the project site and staging area, and therefore the project would not obstruct the evacuation route during construction. Operational conditions would be similar to existing conditions because the new PS would be contained within the existing open space area. The impact would be less than significant.

Alternative C – Less than Significant Impact

As discussed in Section 4.2.10, Hazards and Hazardous Materials, the project would not impair implementation of or physically interfere with an adopted emergency response plan or evacuation plan. The Existing PS Site and staging area on Sunset Parkway are not located along a designated evacuation route. The Ignacio Boulevard Site is situated in an open space area along Ignacio Boulevard across from its intersection with Palmer Drive. Ignacio Boulevard is a designated primary evacuation route and Palmer Drive is a designated secondary evacuation route (Marin County 2023). The Bolling Drive Site is situated in an open space area at the intersection of Bolling Circle and Bolling Drive, both of which are designated secondary evacuation routes (Marin County 2023). The project would not stage any equipment outside of the project site and staging area, and therefore the project would not obstruct the evacuation

route during construction. Operational conditions would be similar to existing conditions because the new PS would be contained within the existing open space area. The impact would be less than significant.

Alternative D – Less than Significant Impact

As discussed in Section 4.2.10, Hazards and Hazardous Materials, the project would not impair implementation of or physically interfere with an adopted emergency response plan or evacuation plan. The Existing PS Site and staging area on Sunset Parkway are not located along a designated evacuation route. The Ignacio Boulevard Site is situated in an open space area along Ignacio Boulevard across from its intersection with Palmer Drive. Ignacio Boulevard is a designated primary evacuation route and Palmer Drive is a designated secondary evacuation route (Marin County 2023). The Main Gate Road Site is situated in an open space area along Main Gate Road, which is a designated secondary evacuation route (Marin County 2023). The project would not stage any equipment outside of the project site and staging area, and therefore the project would not obstruct the evacuation route during construction. Operational conditions would be similar to existing conditions because the new PS would be contained within the existing open space area. The impact would be less than significant.

Alternative E – Less than Significant Impact

As discussed in Section 4.2.10, Hazards and Hazardous Materials, the project would not impair implementation of or physically interfere with an adopted emergency response plan or evacuation plan. The Existing PS Site and staging area on Sunset Parkway are not located along a designated evacuation route. The Ignacio Boulevard Site is situated in an open space area along Ignacio Boulevard across from its intersection with Palmer Drive. Ignacio Boulevard is a designated primary evacuation route and Palmer Drive is a designated secondary evacuation route (Marin County 2023). The C Street Site is situated in a baseball field along Main Gate Road, which is a designated secondary evacuation route (Marin County 2023). The project would not stage any equipment outside of the project site and staging area, and therefore the project would not obstruct the evacuation route during construction. Operational conditions would be similar to existing conditions because the new PS would be contained within the existing open space area. The impact would be less than significant.

- 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?**

Alternative A – Less than Significant Impact

The Sunset Parkway Site, Existing PS Site, and staging area on Sunset Parkway are located in developed areas within the WUI. There is potential for equipment used during project construction to create sparks which could pose an exacerbated fire risk. Construction activities would adhere to all applicable policies and regulations related to fire safety and stopping the spread of wildfire in case of ignition. This would reduce the risks associated with wildfires and the uncontrolled spread of wildfire during construction to a less than significant level. Project operation would not introduce a substantial new risk of wildfire or exacerbate the uncontrolled spread of wildfire. The new PS would be constructed within an already developed median within Sunset Parkway. The project would include some ornamental landscaping around the new PS which would be maintained in order to prevent the buildup of dry vegetation. Therefore, the project would not exacerbate wildfire risks or expose project occupants to pollutant concentrations from wildfire. The impact of the proposed project would be less than significant.

Alternative B – Less than Significant Impact

The Ignacio Boulevard Site, Existing PS Site, and staging area on Sunset Parkway are situated within the WUI. The Ignacio Boulevard Site and staging are located within a landscaped open space area near Arroyo San Jose Creek. There is potential for equipment used during project construction to create sparks which could pose an exacerbated fire risk. Construction activities would adhere to all applicable policies and regulations related to fire safety and stopping the spread of wildfire in case of ignition. This would reduce the risks associated with wildfires and the uncontrolled spread of wildfire during construction to a less than significant level. Project operation would not introduce a substantial new risk of wildfire or exacerbate the uncontrolled spread of wildfire. The project would include some ornamental landscaping around the new PS which would be maintained in order to prevent buildup of dry vegetation. Therefore, the project would not exacerbate wildfire risks or expose project occupants to pollutant concentrations from wildfire. The impact of the proposed project would be less than significant.

Alternative C – Less than Significant Impact

The Bolling Drive Site is not situated within the WUI or a High FHSZ (County of Marin 2023). The Ignacio Boulevard Site, Existing PS Site, and staging area on Sunset Parkway are situated within the WUI. The Ignacio Boulevard Site and staging are located within a landscaped open space area near Arroyo San Jose Creek. There is potential for equipment used during project construction to create sparks which could pose an exacerbated fire risk. Construction activities would adhere to all applicable policies and regulations related to fire safety and stopping the spread of wildfire in case of ignition. This would reduce the risks associated with wildfires and the uncontrolled spread of wildfire during construction to a less than significant level. Project operation would not introduce a substantial new risk of wildfire or exacerbate the uncontrolled spread of wildfire. The project would include some ornamental landscaping around the new PS which would be maintained in order to prevent buildup of dry vegetation. Therefore, the project would not exacerbate wildfire risks or expose project occupants to pollutant concentrations from wildfire. The impact of the proposed project would be less than significant.

Alternative D – Less than Significant Impact

The Main Gate Road Site is not situated within the WUI or a High FHSZ (County of Marin 2023). The Ignacio Boulevard Site, Existing PS Site, and staging area on Sunset Parkway are situated within the WUI. The Ignacio Boulevard Site and staging are located within a landscaped open space area near Arroyo San Jose Creek. There is potential for equipment used during project construction to create sparks which could pose an exacerbated fire risk. Construction activities would adhere to all applicable policies and regulations related to fire safety and stopping the spread of wildfire in case of ignition. This would reduce the risks associated with wildfires and the uncontrolled spread of wildfire during construction to a less than significant level. Project operation would not introduce a substantial new risk of wildfire or exacerbate the uncontrolled spread of wildfire. The project would include some ornamental landscaping around the new PS which would be maintained in order to prevent buildup of dry vegetation. Therefore, the project would not exacerbate wildfire risks or expose project occupants to pollutant concentrations from wildfire. The impact of the proposed project would be less than significant.

Alternative E – Less than Significant Impact

The C Street Site is not situated within the WUI or a High FHSZ (County of Marin 2023). The Ignacio Boulevard Site, Existing PS Site, and staging area on Sunset Parkway are situated within the WUI. The Ignacio Boulevard Site and staging are located within a landscaped open space

area near Arroyo San Jose Creek. There is potential for equipment used during project construction to create sparks which could pose an exacerbated fire risk. Construction activities would adhere to all applicable policies and regulations related to fire safety and stopping the spread of wildfire in case of ignition. This would reduce the risks associated with wildfires and the uncontrolled spread of wildfire during construction to a less than significant level. Project operation would not introduce a substantial new risk of wildfire or exacerbate the uncontrolled spread of wildfire. The project would include some ornamental landscaping around the new PS which would be maintained in order to prevent buildup of dry vegetation. Therefore, the project would not exacerbate wildfire risks or expose project occupants to pollutant concentrations from wildfire. The impact of the proposed project would be less than significant.

- 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?*

Alternative A – No Impact

The project would not require the installation or maintenance of any associated infrastructure that may exacerbate fire risk or result in impacts to the environment. The proposed PS and piping at the Sunset Parkway Site would be accessed by existing roads and served by existing utilities. No other infrastructure, such as fuel breaks, would be required. No impact would occur.

Alternative B – No Impact

The project would not require the installation or maintenance of any associated infrastructure that may exacerbate fire risk or result in impacts to the environment. The proposed PS and piping at the Ignacio Boulevard Site would be accessed by existing roadways and served by existing utilities. No other infrastructure, such as fuel breaks, would be required. No impact would occur.

Alternative C – No Impact

The project would not require the installation or maintenance of any associated infrastructure that may exacerbate fire risk or result in impacts to the environment. The proposed PS and piping at the Ignacio Boulevard Site and Bolling Drive Site would be accessed by existing roadways and served by existing utilities. No other infrastructure, such as fuel breaks, would be required. No impact would occur.

Alternative D – No Impact

The project would not require the installation or maintenance of any associated infrastructure that may exacerbate fire risk or result in impacts to the environment. The proposed PS and piping at the Ignacio Boulevard Site and Main Gate Road Site would be accessed by existing roadways and served by existing utilities. No other infrastructure, such as fuel breaks, would be required. No impact would occur.

Alternative E – No Impact

The project would not require the installation or maintenance of any associated infrastructure that may exacerbate fire risk or result in impacts to the environment. The proposed PS and piping at the Ignacio Boulevard Site and C Street Site would be accessed by existing roadways and served by existing utilities. No other infrastructure, such as fuel breaks, would be required. No impact would occur.

- 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?*

Alternative A – Less than Significant Impact

As discussed in Section 4.2.7, Geology and Soils, the project would not significantly alter slope stability or drainage patterns. The Sunset Parkway Site, Existing PS Site, and staging area on Sunset Parkway are all within developed roadway medians and are situated on relatively flat land. The sites are not located near areas that are at risk of landslide. The construction of a new PS at the Sunset Parkway Site or demolition of the Lynwood PS would not expose people or structures to significant risks, including downslope flooding or landslides, as a result of runoff, post-fire instability, or drainage changes. The impact would be less than significant.

Alternative B – Less than Significant Impact

As discussed in Section 4.2.7, Geology and Soils, the project would not significantly alter slope stability or drainage patterns. The Existing PS Site and staging area on Sunset Parkway are within developed roadway medians and are situated on relatively flat land. The Ignacio Boulevard Site is located in a flat open space area developed with ornamental landscaping. The sites are not located near areas that are at risk of landslide. The construction of a new PS at the Ignacio Boulevard Site or demolition of the Lynwood PS would not expose people or structures to significant risks, including downslope flooding or landslides, as a result of runoff, post-fire instability, or drainage changes. The impact would be less than significant.

Alternative C – Less than Significant Impact

As discussed in Section 4.2.7, Geology and Soils, the project would not significantly alter slope stability or drainage patterns. The Existing PS Site and staging area on Sunset Parkway are within developed roadway medians and are situated on relatively flat land. The Ignacio Boulevard Site is located in a flat open space area developed with ornamental landscaping. The Bolling Drive Site is situated at the bottom of a slope and within an open space area. The construction of a new PS at the Ignacio Boulevard Site or Bolling Drive Site, or demolition of the Lynwood PS would not expose people or structures to significant risks, including downslope flooding or landslides, as a result of runoff, post-fire instability, or drainage changes. The impact would be less than significant.

Alternative D – Less than Significant Impact

As discussed in Section 4.2.7, Geology and Soils, the project would not significantly alter slope stability or drainage patterns. The Existing PS Site and staging area on Sunset Parkway are within developed roadway medians and are situated on relatively flat land. The Ignacio Boulevard Site is located in a flat open space area developed with ornamental landscaping. The Main Gate Road Site is also located in a flat open space area and is not near any residences or occupied uses. The sites are not located near areas that are at risk of landslide. The construction of a new PS at the Ignacio Boulevard Site or Main Gate Road Site, or demolition of the Lynwood PS would not expose people or structures to significant risks, including downslope flooding or landslides, as a result of runoff, post-fire instability, or drainage changes. The impact would be less than significant.

Alternative E – Less than Significant Impact

As discussed in Section 4.2.7, Geology and Soils, the project would not significantly alter slope

stability or drainage patterns. The Existing PS Site and staging area on Sunset Parkway are within developed roadway medians and are situated on relatively flat land. The Ignacio Boulevard Site is located in a flat open space area developed with ornamental landscaping. The C Street Site is located within a baseball field in a flat area. The sites are not located near areas that are at risk of landslide. The construction of a new PS at the Ignacio Boulevard Site or C Street Site, or demolition of the Lynwood PS would not expose people or structures to significant risks, including downslope flooding or landslides, as a result of runoff, post-fire instability, or drainage changes. The impact would be less than significant.



4.2.21 Mandatory Findings of Significance

	<i>Potentially Significant Impact</i>	<i>Less than Significant with Mitigation Incorporated</i>	<i>Less than Significant Impact</i>	<i>No Impact</i>
a) Does the project have the potential to substantially 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 a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

DISCUSSION OF IMPACTS

a) *Does the project have the potential to substantially 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 a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?*

Alternative A through Alternative E – Less than Significant Impact with Mitigation Incorporated

Under Alternatives A through E, the proposed project would have the potential to impact non-special status nesting birds, which are protected under the MBTA. The project would implement Mitigation Measure BIO-1, which requires pre-construction nesting bird surveys, which would reduce this potential impact to a less than significant level. No other potentially significant impact to biological resources would occur under Alternatives A through E.

Although there are no known cultural, historical, or tribal cultural resources on any of the project sites or staging areas, ground-disturbing activities at the project sites could potentially uncover unknown archaeological resources, which is a potentially significant impact. Under Alternatives A through E, Mitigation Measure CUL-1 and CUL-3 would be implemented which describe proper protocols to be followed should any unknown archaeological resources be uncovered during project construction. In addition, Mitigation Measure CUL-2 would be implemented under

Alternatives D and E which would require archeological resources identification training for the project construction crew at the Main Gate Road Site and C Street Site, and that an archaeologist who meets the Secretary of the Interiors Standards for Archaeology monitor all excavation work on-site. With implementation of these measures, no potentially significant impacts would occur to cultural, historical, or tribal cultural resources. Therefore, the project would not substantially 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 a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory. The impact under Alternatives A through E would be less than significant with mitigation incorporated.

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)?*

Alternative A through Alternative E – Less than Significant Impact with Mitigation Incorporated

Other projects within the proposed project area include but may not be limited to:

- City of Novato Citywide Crosswalk Enhancements and Traffic Management Project
- City of Novato 2023 & 2024 Annual Pavement Rehabilitation Project

A portion of the Citywide Crosswalk Enhancements and Traffic Management Project would occur along Main Gate Road adjacent north of the Main Gate Road Site and just southwest of the C Street Site. Should Alternative D or E be implemented, the District would coordinate construction schedules with the City to ensure that the two projects are not ongoing at the same time to avoid cumulatively considerable impacts related to air quality and noise. In addition, the proposed project would implement air quality mitigation measures which would ensure air quality emissions would remain at a less-than-significant level. It is not likely that a minor circulation project, such as crosswalk or traffic infrastructure enhancements, or other projects in the vicinity would result in significant air quality impacts that would be cumulatively considerable when combined with the proposed project. Cumulatively considerable impacts would not result from the operation of both projects as the Citywide Crosswalk Enhancements and Traffic Management Project would not introduce a new source of emissions or cause other growth inducing impacts.

In addition, a portion of South Novato Boulevard that runs north to south and intersects Sunset Parkway near the Sunset Parkway Site and Existing PS Site is included in the City’s Annual Pavement Rehabilitation Project. The District would coordinate construction schedules with the City to ensure that construction at the intersection of South Novato Boulevard and Sunset Parkway is not occurring at the same time as project activities at the Sunset Parkway Site or Existing PS Site. In addition, the proposed project would implement air quality mitigation measures which would reduce air quality emissions to a less-than-significant level. It is not likely that a minor circulation project, such as road paving, or other projects in the vicinity would result in significant air quality impacts that would be cumulatively considerable when combined with the proposed project. Cumulatively considerable impacts would not result from the operation of both projects as the Annual Pavement Rehabilitation Project would not introduce a new source of emissions or cause other growth inducing impacts.



- c) *Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?*

Potential impacts to human beings have been addressed in this IS/MND, including impacts related to air quality, noise, and transportation. Project construction activities would cause potential temporary impacts to humans due to the generation of criteria air pollutants, which would be considered less than significant under CEQA with implementation of Mitigation Measure AQ-1. Mitigation Measure AQ-1 requires that the project implement BMPs as recommended by the BAAQMD 2022 CEQA Air Quality Guidelines. Project impacts related to noise and transportation were found to be less than significant. Therefore, the project would not have environmental effects that would cause substantial adverse effects on human beings, either directly or indirectly.



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