

## VIII. Greenhouse Gas Emissions

Would the Project:

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

### Background

Greenhouse gases (GHGs) are atmospheric gases that capture and retain a portion of the heat radiated from the earth after it has been heated by the sun. The primary GHGs are carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>), and nitrous oxide (N<sub>2</sub>O), ozone, and water vapor. While GHGs are natural components of the atmosphere, CO<sub>2</sub>, CH<sub>4</sub>, and N<sub>2</sub>O, are also emitted in substantial quantities from human activities and their accumulation in the atmosphere over the past 200 years has substantially increased their concentrations. This accumulation of GHGs has been implicated as the driving force behind global climate change.

Human emissions of CO<sub>2</sub> are largely by-products of fossil fuel combustion, whereas CH<sub>4</sub> results from off-gassing associated with organic decay processes in agriculture, landfills, etc. Other GHGs, including hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride, are generated by certain industrial processes. The global warming potential of GHGs are typically reported in comparison to that of CO<sub>2</sub>, the most common and influential GHG, in units of "carbon dioxide-equivalents" (CO<sub>2</sub>e).

There is international scientific consensus that human-caused increases in GHGs have and will continue to contribute to global warming. Potential global warming impacts in California may include, but are not limited to, loss in snow pack, sea level rise, more extreme heat days per year, more high ozone days, more large forest fires, and more drought years. Secondary effects are likely to include a global rise in sea level, impacts to agriculture, changes in disease vectors, and changes in habitat and biodiversity.

### Discussion

- a) The Bay Area Air Quality Management District (BAAQMD) is the primary agency responsible for air quality regulation in the nine-county San Francisco Bay Area Air Basin. As part of that role, the BAAQMD has prepared *CEQA Air Quality Guidelines* that provide CEQA thresholds of significance for operational GHG emissions from land use projects

(i.e., 1,100 metric tons of CO<sub>2</sub>e per year, which is also considered the definition of a cumulatively considerable contribution to the global GHG burden and, therefore, of a significant cumulative impact), but has not defined thresholds for project construction GHG emissions. The *Guidelines* methodology and thresholds of significance have been used in this Initial Study's analysis of potential GHG impacts associated with the Project.

The CalEEMod model was used to quantify GHG emissions associated with Project construction activities (for informational purposes), as well as long-term operational emissions produced by Project motor vehicles, energy and water use, and solid waste generation. CalEEMod incorporates GHG emission factors for motor vehicles, electricity from central electric utilities, and water use and solid waste generation.

The estimated construction GHG emissions are 139.6 metric tons of CO<sub>2</sub>e (for which there is no BAAQMD CEQA significance threshold). The Project's estimated operational GHG emissions are presented in Table GHG-1. The Project's GHG operational emissions would be 106.0 metric tons per year, which is substantially below the BAAQMD threshold of 1100 metric tons. Therefore this impact would be **less than significant**.

**Table GHG-1: Project Operational Greenhouse Gas Emissions (Metric Tons Per Year)**

Project GHG Source	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O	CO <sub>2</sub> e
Area	< 0.01	< 0.01	< 0.01	< 0.01
Energy Use	36.88	< 0.01	< 0.01	37.05
Motor Vehicles	56.39	< 0.01	< 0.01	56.44
Solid Waste Disposal	2.42	0.14	< 0.01	5.98
Water Use	4.20	0.07	< 0.01	6.53
<b>Total</b>				<b>106.00</b>
<b>Significance Thresholds</b>				<b>1100</b>
<b>Significant Impact?</b>				<b>No</b>

- b) Assembly Bill 32 (AB32), the California Global Warming Solutions Act, requires the CARB to lower State GHG emissions to 1990 levels by 2020—a 25% reduction statewide with mandatory caps for significant GHG emission sources. AB32 directed CARB to develop discrete early actions to reduce GHG while preparing the Climate Change Scoping Plan in order to identify how best to reach the 2020 goal. Statewide strategies to reduce GHG emissions to attain the 2020 goal include the Low Carbon Fuel Standard (LCFS), the California Appliance Energy Efficiency regulations, the California Renewable Energy Portfolio standard, changes in the motor vehicle corporate average fuel economy (CAFE)

standards, and other early action measures that would ensure the state is on target to achieve the GHG emissions reduction goals of AB 32.

The BAAQMD's *Spare the Air, Cool the Climate* (2017 Plan), focuses on two closely-related goals: protecting public health from air pollutant exposures and protecting the climate. Consistent with the GHG reduction targets adopted by the State of California, the 2017 Plan lays the groundwork for a long-term effort to reduce Bay Area GHG emissions 40 percent below 1990 levels by 2030 and 80 percent below 1990 levels by 2050.

The 2017 Plan defines an integrated, multipollutant control strategy to reduce emissions of particulate matter, toxic air contaminants (TACs), ozone precursors and greenhouse gases (GHG).

The 2017 Plan GHG control strategy is based on the following key priorities:

- Reduce emissions of "super-GHGs" such as methane, black carbon and fluorinated gases.
- Decrease demand for fossil fuels (i.e., gasoline, diesel and natural gas).
  - Increase efficiency of the energy and transportation systems.
  - Reduce demand for vehicle travel, and high-carbon goods and services.
- Decarbonize the energy system.
  - Make the electricity supply carbon-free.
  - Electrify the transportation and building sectors.

The State Building Standards Commission adopted updates to the California Green Building Standards Code (CALGreen), which went into effect in January 2011. CALGreen contains requirements for construction site selection, storm water control during construction, construction waste reduction, indoor water use reduction, material selection, natural resource conservation, and site irrigation conservation. CALGreen provides for design options allowing the designer to determine how best to achieve compliance for a given site or building condition. CALGreen also requires building commissioning, which is a process for verifying that all building systems, like heating and cooling equipment and lighting systems, are functioning at their maximum efficiency. CALGreen provides the minimum standard that buildings need to meet in order to be certified for occupancy, but does not prevent a local jurisdiction from adopting more stringent requirements. CALGreen is intended to (1) reduce GHG emissions from buildings; (2) promote environmentally responsible, cost-effective, healthier places to live and work; and (3) reduce energy and water consumption.

The *Climate Change Action Plan* (CCAP - City of Novato. 2009) is the City's first attempt to specify local strategies to address global climate change by decreasing local greenhouse gas emissions, ensuring local conformity with California climate change legislation, and preparing the City for climate change impacts. As part of the CCAP, the

City inventoried GHG from municipal and community-wide sources to establish a baseline to guide emissions reduction strategies. The CCAP includes local actions to reduce GHG emissions in the key sectors of energy use, transportation, and solid waste.

The Project site is accessible by Marin Transit bus routes and SMART service. The Project would be required to obtain building permits for construction, which would ensure compliance with CALGreen (Title 24). And the GMO office/maintenance facility will include design provisions to accommodate rooftop solar panels (although there are no present plans for their installation).

Thus, the Project would not conflict with the goals and policies of AB32 and the CCAP. The project would have a **less-than-significant** impact related to this issue.

**IX. Hazards and Hazardous Materials**

Would the Project:

<b>Environmental Issue</b>	<b>Potentially Significant Impact</b>	<b>Less Than Significant with Mitigation</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?			X	
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?			X	
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?			X	
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?			X	
e) For a Project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the Project result in a safety hazard or excessive noise for people residing or working in the Project area?				X
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?				X
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?				X

## Background

The project area was operated as a military installation from the early 1930s through the 1970s. The site formerly housed a large building (Building 971), that served as the Navy Exchange. That building was removed from the site in 2012. The project site is underlain by a groundwater plume of petroleum hydrocarbon compounds including BTX and MTBE. That contamination was caused by leaking underground storage tanks (USTs) at a former gas station and former Navy public works building just to the south of the site. The former leaking USTs have been removed and the Navy has conducted extensive soil and groundwater remediation in the project area.

### *Groundwater and Soil Contamination and Remediation*

The groundwater of PBC Parcel 1, which includes the project site, has been extensively studied and remediated by the Navy. In general, the groundwater flows south to north and varies seasonally 7 to 13.5 feet below ground surface (bgs) at the southern parcel 1A boundary to approximately 4.5 to 13.5 feet bgs at the norther (project site) parcel 1A boundary. Parcel 1A is underlain by groundwater containing a plume of petroleum hydrocarbon compounds including MTBE and BTEX. The plume originated from a leaking UST at the former Building 957, just south of the project site, as well as at the former Navy gas station, also just south of the site. The leaking tanks were removed in the mid-1990s.

The MTBE portion of the combined plume flows south to north under the project site; the BTEX portion of the plume extends onto or just south of the project site, and is limited to the west side of C Street. Under the Base Realignment and Closure (BRAC) program, the Navy conducted numerous investigations and cleanups at Parcel 1. In July 2000, the San Francisco Bay Area Regional Water Quality Control Board (RWQCB) issued Order No. 00-64 that required the Navy to further investigate, evaluate, and remediate the plume. The Navy subsequently addressed the Order's requirements via a Work Plan that was implemented in the summer of 2002. Remediation work continued through 2011.

After Navy's cleanup of the property was completed in 2011, the Navy transferred the property to the US Department of Education, which then transferred the property to NUSD. To address long-term management of *in situ* contamination left in-place at the site, the Navy entered into a land use covenant with NUSD and the Department of Toxic Substances Control (DTSC).

Starting in early 2012, to complete the environmental assessment required by the California Department of Education under CCR Title 22, §69100 - §69108, NUSD conducted further investigation at the site for lead from lead-based paint (LBP) and chlorinated pesticides from termiticide use in shallow soils around the perimeters of the buildings formerly on the site. Results from this sampling event indicate chlorinated pesticide concentrations around buildings are below levels of concern. However, step-out sampling for lead was conducted in May 2012. The results of the step-out sampling indicate that about 30 cubic yards of surface soil along the perimeters of two existing buildings are contaminated with concentrations of lead in excess of the 80 mg/kg

California Human Health Screening Level (CHHSL). Under supervision of the California Department of Public Health - Childhood Lead Poisoning Prevention Branch, in January 2013, NUSD completed a lead abatement activity to remove the LBP-contaminated soil from around the identified structures, one of which was on the project site. The structure on the site was subsequently demolished and removed.

A Preliminary Environmental Assessment Report (PEA Report) was prepared for the NUSD to describe the site's contamination and remediation history, and make recommendations regarding any future work (ECON, Revised Preliminary Environmental Assessment Report, Hamilton Elementary Schools Site [Parcel 1 A/B], State Access Road and C Street [Site Code 204114-11], October 21, 2013). Based on the PEA Report, the following recognized environmental conditions were identified: lead, total petroleum hydrocarbons as gasoline (TPH, benzene, toluene, ethylbenzene, xylenes, and methyl tert-butyl ether (MTBE) in soil; MTBE in groundwater; and volatile organic compounds (VOCs), benzene, trichloroethene, vinyl chloride, and 1,3-butadiene in soil gas. These chemicals were released during past activities at and near the site. The overall Parcel 1A site has undergone remediation activities by the Navy in an attempt to remove the TPH and VOC contamination, and is currently being monitored for long-term natural attenuation (degradation) of residuals. A lead removal action plan also was conducted to remove the lead-contaminated soil associated with lead-based paint on the buildings formerly on the site. The PEA report concluded that the residual contamination at the site does not pose an unacceptable risk to public health or the environment, and thus recommends "no further action" for the proposed site.

The District made the Draft PEA Report available for public review in April 2014, and held a public hearing on it on April 15, 2014. No public comments were received. The District submitted a Final PEA Report to DTSC on November 6, 2013). Based on DTSC's review of the PEA Report, neither presence of residual contamination nor the presence of a naturally occurring hazardous material that would pose a threat to public health or the environment under unrestricted land use was indicated at the site. Therefore, DTSC concurred with the conclusion of the PEA Report that further environmental investigations of the site were not required, and approved the PEA Report (letter from Jose Salcedo, Chief, Northern California Schools Unit, Brownfields and Environmental Restoration Program, to Mark Silva, Director of Maintenance, Operations, and Transportation, NUSD, January 27, 2015).

The approval noted that, pursuant to Education Code Section 17213.2 (e), if a previously unidentified release or threatened release of a hazardous material or the presence of a naturally occurring hazardous material, is discovered at any time during construction at the site, the District shall cease all construction and notify DTSC. In such a case, additional assessment, investigation, or cleanup may be required.

### *Land Use Restrictions*

Land Use Covenants were applied to the Parcel 1A/B deed by the Navy in November 2011. Among the restrictions are the following:

- No dewatering activities unless conducted in accordance with a Navy-, DTSC, and RWQCB-approved work plan.
- No disturbance of groundwater monitoring wells or installation of water wells without prior approval of the Navy, DTSC, and RWQCB.
- No activities that will disturb the soil at or below 3 feet below the ground surface in the area of known residual contamination without a Navy, DTSC, and RWQCB-approved Soil Management Plan and health and Safety Plan.
- Access shall be granted for ongoing corrective actions and/or operation and maintenance.
- Continuation of groundwater monitoring by the Navy in accordance with an approved groundwater monitoring plan.
- Annual sampling and inspection reports shall be prepared by the Navy for DTSC and the RWQCB.

### **Discussion**

- a) Some construction-related hazardous materials (lubricants, cleaners, paints, sealants, etc.) may be stored and used on the site during project construction. These materials would be stored in contained areas and would be used according to their directions. Therefore this impact would ***be less than significant***.

During project operations, various oils, fuels, solvents, paints, and cleaners may be in use in the building. While these materials could be hazardous if released, they would be stored as required by law and used in accordance with manufacturers' requirements. In addition, all storage and work with these materials would be done in the proposed work bays. These bays would include spill containment and catchment facilities and clean-up supplies. All workers would be trained in emergency response procedures. Therefore operational impacts would be ***less than significant***.

- b, d) The site is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962 because it has experienced soil and groundwater contamination. However, as described above, these conditions have been remediated to DTSC's satisfaction, with ongoing monitoring.

Land Use Covenants, described above, also have been applied to the site, including limits on soil and groundwater disturbance, as well as continued monitoring. The project would be required to conform with these deed restrictions, with verification by the Navy, DTSC,



and the RWQCB. The deed restrictions include limitations on site excavation of greater than three feet in depth as well as limitations on dewatering and groundwater pumping at the site. The proposed project excavations would not exceed two feet in depth and no dewatering or groundwater pumping is proposed. Therefore, although the project is on a State-listed site, it would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials. This impact would be ***less than significant***.

- c) The Novato Charter School is 500-600 feet south of the project site, across C Street. However, as described under response to questions IXb and d, above, construction and operation of the project would not emit hazardous materials outside of the contained work bays. Therefore the project would have a ***less-than-significant*** potential to significantly affect children or adults at the school.
- e) The project site is not within an Airport Land Use Plan area, or within two miles of a public or public-use airport or a private airstrip. Therefore it would not present a hazard to air safety, and **no impact** would occur.
- f) Construction and operation of the project are not expected to interfere with the City's Emergency Preparedness Plan or Emergency Response Plan. There would be approximately 15 workers at the site, as well as adequate parking and emergency access space. The building would be constructed with fire safety and hazardous material storage equipment as required by State and Federal law. It would be sprinklered and constructed under current applicable building codes. It would not in any way adversely affect roadways or traffic congestion in the project area. Therefore it would not adversely affect emergency response or access. **No impact** would occur.
- g) The project is in the flat, developed bay plain, on the grounds of the former Hamilton Naval Air Station. It is completely surrounded by fully developed urban uses and the nearest wildfire-hazard areas are several miles west of the site. Therefore the project would have **no impact** with respect to wildfire hazards.

## X. Hydrology and Water Quality

Would the Project:

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

## Discussion

a, c, e) Under Section 402 of the Clean Water Act, the U.S. EPA has established regulations through the National Pollution Discharge Elimination System (NPDES) stormwater program to control stormwater discharges, including those associated with construction activities. The NPDES stormwater permitting program regulates stormwater quality from construction sites. The State Construction General Permit (CGP) requires the development and implementation of a Stormwater Pollution Prevention Plan (SWPPP) and the use of appropriate best management practices (BMPs) for erosion control and spill prevention during construction. Dischargers whose Projects disturb one or more acres of soil or whose Projects disturb less than one acre but are part of a larger common plan of development that in total disturbs one or more acres, are required to obtain coverage under the CGP for Discharges of Stormwater Associated with Construction Activity (CGP Order 2009-0009-DWQ).

The City of Novato is under the jurisdiction of the Marin County Flood Control and Water Conservation District (MCFCWCD), which manages stormwater and flooding problems in Marin County and is responsible for administering the Marin County Stormwater Pollution Prevention Program (MCSTOPPP) and FEMA Flood Insurance Program. (City of Novato Existing Conditions Report, 2016, page 12-3)

The Project site is relatively flat and mostly covered with crushed gravel and bare earth. Development of the proposed Project would require disturbance and light grading, as described in the Project Description. Minimal topographic changes would occur as a result of the project as the site is, and would remain, relatively flat.

During construction activities, there would be a potential for surface water to carry sediment from on-site erosion and small quantities of pollutants into the City's stormwater system and, ultimately, San Francisco Bay. Soil erosion may occur along Project boundaries during construction in areas where temporary soil storage may be required. Small quantities of pollutants may enter the storm drainage system, potentially degrading water quality.

Construction of the proposed Project also would require the use of gasoline and diesel-powered heavy equipment. Chemicals such as gasoline, diesel fuel, lubricating oil, hydraulic oil, lubricating grease, automatic transmission fluid, paints, solvents, glues, and other substances would be used during construction. An accidental release of any of these substances could degrade the water quality of the surface water runoff and add additional sources of pollution into the drainage system.

The proposed Project would be required to comply with the State CGP. The District would be required to develop and implement a SWPPP that identifies appropriate construction BMPs in order to minimize potential sedimentation or contamination of storm water runoff generated from the Project site. The SWPPP would identify the risk level for erosion and

sedimentation and how much monitoring of potential pollutants is required. Implementation of a SWPPP as required would ensure that the construction of the proposed Project would not violate any water quality standards or waste discharge requirements and reduce potential impacts to a less-than-significant level, as described in Mitigation Measure HYD-1.

As required under State Water Resources Control Board Order No. R2 2009-0074, the City of Novato requires regulated Projects, such as this one, to prepare a Stormwater Control Plan (SWCP). The SWCP must include post-construction stormwater treatment measures such as bio-retention facilities and source controlled BMPs. The SWCP must also address ongoing maintenance of those facilities.

Prior to the issuance of grading permits or building permits (whichever occurs first), the Project would be required to obtain coverage under the State CGP (NPDES General Permit for Stormwater Discharges Associated with Construction Activity (Order 2009-0009 DWQ) by preparing a Stormwater Pollution Prevention Plan (SWPPP) and submitting it along with a notice of intent, to the San Francisco Bay RWQCB. The SWPPP shall identify a practical sequence for BMP implementation and maintenance, site restoration, contingency measures, responsible parties, and agency contacts. The SWPPP would include but not be limited to the following elements:

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

- In the event of significant construction delays or delays in final landscape installation, native grasses or other appropriate vegetative cover would be established on the construction site as soon as possible after disturbance, as an interim erosion control measure throughout the wet season.

The project would result in new impervious surfaces being created. Peak flows, although greater than existing, would not be expected to exceed those from prior site conditions, before the Exchange Building was removed. Drainage would be directed into an on-site storm drain system that would discharge into the large drainage pipe just north of the project site. The District would coordinate any new connections with the City. Therefore, impacts to runoff would be **less than significant**.

Potentially contaminated runoff from the new impervious areas would occur. Implementation of the Construction General Permit requirements described above, as well as Mitigation Measures HYD-1 and HYD-2, below, would reduce the other water quality impacts described above to a **less-than-significant** level.

- b) The City of Novato does not rely on groundwater for any part of its water supply. (City of Novato Existing Conditions Report, 2016, page 12-5) Water is provided by the North Marin Water District. Staff would be relocated from elsewhere in Novato as a result of the project, so there would be no net increase for water demand. The project would include low-flow fixtures and water-conserving landscaping, which would provide water supply efficiencies. No groundwater wells or other supplies would be required. Therefore, the proposed Project would not contribute to depletion of groundwater supplies and **no impact** would occur to groundwater. Similarly, the project would not affect a groundwater management plan.
- d) This site not located in a flood hazard zone (ABAG Resilience Program, <http://gis.abag.ca.gov/website/Hazards/?hlyr=northSanAndreas&co=6081>, accessed March 8, 2019). The site is not in a mapped tsunami runup zone. Nor is it in not in a 100-year or 500-year flood hazard zone. As sea levels rise, the potential for flooding may increase, depending on the timing/adequacy of flood protection measures. Because the project site is not mapped within a mapped flood hazard zone, flooding-related impacts of the project (such as impeding flood flows or flood-related release of pollutants) would be unlikely. Flood hazard impacts would be **less than significant**.

The project site is located approximately eight miles southeast from Stafford Lake Dam. Stafford Lake Dam is under the Division of Dam Safety (DSOD) jurisdiction, which routinely monitors and evaluates the dam conditions. An inundation map of Novato Creek from a hypothetical failure of Stafford Dam (City of Novato) shows the limit of inundation at the site as being about a half mile north of the Project site. Therefore, the project would not impede flood waters nor increase flood hazards from that source.

Seiches and tsunamis are seismically induced large waves of water. Because of the distance of the site from any large water body and the elevation of the site well above sea level, there is little potential for a tsunami to affect Novato (Miller Pacific 2019). Therefore, the proposed Project would have **no impact** to future occupants of the project due to inundation by seiche, tsunami or mudflow.

### **Mitigation Measures**

***Mitigation Measure HYD-1:*** Prior to the issuance of grading permits for the proposed Project, the Project engineers shall prepare a Stormwater Control Plan. The Stormwater Control Plan shall identify pollution prevention measures and practices to prevent polluted runoff from leaving the Project site.

***Mitigation Measure HYD-2:*** The District shall maintain in perpetuity the post-construction BMPs listed in the Stormwater Operations and Management Plan. The owner shall make changes or modifications to the BMPs to ensure peak performance. The owner shall be responsible for costs incurred in operating, maintaining, repairing, and replacing the BMPs. The owner shall conduct inspection and maintenance activities and complete annual reports.

## X. Land Use and Planning

Would the Project:

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

### Discussion

- a) The proposed building would be located within an urbanized area on a site that formerly contained a base exchange/warehouse building. Because the project would redevelop a site with a use that generally consistent with nearby land uses and a building that is a quarter of the size of the previous building and would not create conflicts between uses or divide an established community, there would be **no impact**.
- b) The project site is designated as Community Facilities (CF) on the City of Novato General Plan Land Use Map (City of Novato 1996) and on the City of Novato Zoning Map (City of Novato 2001). The proposed use that would support the NUSD's schools is consistent with the General Plan and Zoning designations. The Project would have **no impact** on plan conformance.
- c) The Project site is not located within the boundaries of a habitat conservation plan or a natural community conservation plan; therefore, the Project would not conflict with any habitat plans and there would be **no impact**.

## XI. Mineral Resources

Would the Project:

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

### Discussion

- a, b) The Project site is designated Community Facilities (CF) in the City of Novato General Plan and consists of an urban parcel developed with school facilities and playfields. The site is not identified in the City's General Plan as a site containing mineral resources that would be of local, regional, or statewide importance; therefore, the Project is not considered to have any impacts on mineral resources (Novato General Plan Land Use Map, 1996). The Project site is also outside of any areas designated by the State Mining and Geology Board as containing regionally significant PCC-grade aggregate resources (used in concrete). (City of Novato General Plan 2035, Figure EL-7, 2016) The Project site does not contain any known mineral deposits or active mineral extraction operations. Therefore, there would be **no impact** to mineral resources.



### XIII. Noise

Would the Project result in:

<b>Environmental Issue</b>	<b>Potentially Significant Impact</b>	<b>Less Than Significant with Mitigation</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
a) Generation of a substantial temporary or permanent increase in ambient noise levels in vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?		X		
b) Generation of excessive groundborne vibration or groundborne noise levels?			X	
c) For a Project within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the Project expose people residing or working in the project area to excessive noise levels?			X	

#### Background

Sound is created when vibrating objects produce pressure variations that move rapidly outward into the surrounding air. The more powerful the pressure variations, the louder the sound perceived by a listener. The decibel (dB) is the standard measure of loudness relative to the human threshold of perception. Noise is a sound or series of sounds that are intrusive, objectionable or disruptive to daily life. Many factors influence how a sound is perceived and whether it is considered disturbing to a listener; these include the physical characteristics of sound (e.g., loudness, pitch, duration, etc.) and other factors relating to the situation of the listener (e.g., the time of day when it occurs, the acuity of a listener's hearing, the activity of the listener during exposure, etc.). Environmental noise has many documented undesirable effects on human health and welfare, either psychological (e.g., annoyance and speech interference) or physiological (e.g., hearing impairment and sleep disturbance).

The Project site is located in south Novato in northeast Marin County on the site of the former Hamilton Field air base, which has been converted into a mixed-use development including predominantly residential and recreational uses. Noise-sensitive receptors abound near Project site including the Lanham Village residential community, which includes the Wonder Nook Preschool, to the west and southwest (closest residential units about 200 feet from project site

center), the single-family residential developments at Hamilton Field to the northeast and east (closest units about 400 feet from project site center), and the South Novato Library, the North Bay Children's Center, and the Novato Charter School to the southeast (at about 600 feet, 800 feet and 1200 feet, respectively).

The Project site and vicinity were surveyed (Jan. 30, 2019) to observe influential local noise sources and to measure typical daytime noise levels that future Project site occupants (mostly NUSD employees) would be exposed to, as reported in Table NOI-1.

**Table NOI-1: Daytime Noise Measurement Data and Survey Observations**

Measurement Location	L <sub>min</sub>	L <sub>90</sub>	L <sub>eq</sub>	L <sub>10</sub>	L <sub>max</sub>	Observations
<b>Sample #1</b>  Northeast corner of Project site about 100 feet south of State Access Road.  Begin 11:20	50.6	52.9	57.1	59.8	66.1	Major noise source: construction material stored on adjacent lot to the south loaded by forklift in to an idling truck; secondary sources: residential construction activity on lots to the north and east, motor vehicle pass-bys on State Access Road; Highway 101 not a major influence on local noise levels - it passes more than 1000 ft. to the west and is shielded by a high (>10 ft) sound wall and intervening buildings.
<b>Sample #2</b>  Location same as Sample #1  Begin 11:45	43.9	46.9	51.7	54.3	59.3	Loading of construction material (as mentioned above in 'Observations') ceased before the 2 <sup>nd</sup> sampling period began; major off-site noise sources continued to be motor vehicle pass-bys and residential construction activity; there were no other on-site noise sources.

The unit of measurement for table entries is the **decibel (dB)**, the standard measure of a sound's loudness relative to the human threshold of perception. Decibels are said to be **A-weighted (dBA)** when corrections are made to a sound's frequency components during a measurement to reflect the known, varying sensitivity of the human ear to different frequencies. The **Equivalent Sound Level (L<sub>eq</sub>)** is a constant sound level that carries the same sound energy as the actual time-varying sound over the measurement period. **Statistical Sound Levels** - L<sub>min</sub>, L<sub>90</sub>, L<sub>10</sub> and L<sub>max</sub> - are the

minimum sound level, the sound level exceeded 90 percent of the time, the sound level exceeded 10 percent of the time and the maximum sound level, respectively; all as recorded during the **sampling times**, which for the two cases above was **ten minutes**.

Measured short-term average daytime noise levels on the site in the low to mid- 50s dBA. The main influence on local daytime noise levels is motor vehicle traffic on State Access Road and C Street, which pass adjacent to the Project site to the north and east, respectively. In contrast, the influence of Highway 101 traffic is slight; the freeway passes about 1000 feet west of the Project site and the noise it emanates is further attenuated by a high (i.e., >10 feet) sound wall at the freeway's southern edge and the intervening residential buildings of Lanham Village. The Sonoma Marin Area Rail Transit (SMART) light-rail line passes within 100 feet east of the Project site at closest approach. One SMART train pass-by occurred during the on-site measurement. It did not produce a dominant effect on the sound level meter readings as it passed - SMART trains are not required to sound their horns on this part of their route and the engine-noise-only level was comparable to existing daytime background levels at the meter location.

Two other noise sources observed during the survey are worthy of note. Construction material stored on the adjacent lot to the south was being loaded by forklift in to an idling truck with a consequent increment of about 5 dBA to local ambient noise levels while the loading continued. Construction also was ongoing at a senior housing complex to the north and at residential units to the east, contributing occasional peak noise events from equipment operation, construction activity (i.e., hammering), and supply trucks.

The *Novato General Plan* includes objectives, policies and programs relating to noise in its *Safety and Noise* chapter. Noise-related objectives call for the City to ensure compatible development throughout the city, prevent noise increases and reduce noise levels where feasible and practical. Policies and programs to support these objectives focus on enforcing noise and land use compatibility standards, mitigating potential noise impacts from new development and roadway projects, restricting truck traffic to designated routes and enforcing the California Vehicle Code that limits noise emissions of vehicles operated on public streets.

The *Novato General Plan 2035* adopts *Land Use Compatibility Standards* also based on the  $L_{dn}$  metric. Such standards for the Project land use type and the noise-sensitive land uses in the Project site vicinity are given below:

- For Residential:
  - Normally Acceptable –  $L_{dn} < 65$  dBA
  - Conditionally Acceptable –  $L_{dn} > 65$  dBA, but  $< 80$  dBA
  - Unacceptable –  $L_{dn} > 80$  dBA
- For Office, Commercial and Professional:
  - Normally Acceptable –  $L_{dn} < 75$  dBA
  - Conditionally Acceptable –  $L_{dn} > 75$  dBA, but  $< 85$  dBA
  - Unacceptable –  $L_{dn} > 85$  dBA

- For Schools and Libraries:

Normally Acceptable –  $L_{dn} < 65$  dBA

Conditionally Acceptable –  $L_{dn} > 65$  dBA, but  $< 80$  dBA

Unacceptable –  $L_{dn} > 80$  dBA

The *Novato General Plan 2035* (Chapter 4, *Living Well*, Section 5 *Noise*) presents 24-hour average noise contours (using the  $L_{dn}$  metric<sup>2</sup>) for Highway 101 and Novato's major streets (see Figure LW-3, *Existing Vehicular Noise Contours*). At the Project site's location about 1000 feet from Highway 101 and just south of State Access Road, it appears that noise levels on site are in the low to mid-60s dBA  $L_{dn}$ . Thus, the proposed Project's office/vehicular maintenance uses' exposure to ambient noise (in this case, mostly from local motor vehicle traffic) would be compatible with the noise exposure standards set by the General Plan.

Construction noise is addressed in Chapter 19 (Zoning – General Performance Standards) of the *Novato Municipal Code*. Section 19-22.070 (Noise and Construction Hours) states:

*"The following are exempt from the allowable noise level requirements ... Authorized construction activities, including warming-up or servicing of equipment, and any preparation for construction between 7 a.m. and 6 p.m. on weekdays, and between 10 a.m. and 5 p.m. on Saturdays. No construction is allowed on Sundays or official federal national holidays, except as otherwise authorized herein by the Community Development Director."*

Although the project site has been removed by the NUSD from City of Novato jurisdiction, City noise policies and standards can form the basis for CEQA thresholds of significance and mitigation measures.

## **Discussion**

- a) Potentially disturbing noise increments associated with development can occur temporarily during project construction and/or permanently after construction if the project would introduce new, substantial noise sources to the site or in its vicinity.

### Incremental Noise from Construction

The Federal Highway Administration (FHWA) Roadway Construction Noise Model (RCNM) was used to estimate the noise levels at various distances from the locus of construction work produced by a typical working group of Project construction equipment (i.e., a dump truck, a backhoe and a crane) likely to be used for the Project office/maintenance building, as shown in Table NOI-2.

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<sup>2</sup>  $L_{dn}$  is a 24-hour average sound level ( $L_{eq}$ ) with a 10-decibel "penalty" added to sound levels occurring at night between 10:00 p.m. and 7:00 a.m.

**Table NOI-2: Modeled Project Construction Noise Levels**

Distance from Area of Construction Activity (feet)	Average Construction Daytime Noise Level $L_{eq}$ (dBA)	Maximum Construction Daytime Noise Level $L_{max}$ (dBA)
25	84	87
50	78	81
100	72	75
200	66	69

Source: Federal Highway Administration, Roadway Construction Noise Model (RCNM).

Since the closest residential receptors (to the west and southwest of the Project site) are as close as about 200 feet to locations where Project construction equipment could be working, noise levels at these receptors could exceed what is now the existing average/peak ambient background levels. Thus, to protect existing adjacent residents from substantial Project construction noise intrusions, mitigation measure NOI-1 shall be implemented to assure that the Project's incremental temporary construction noise impacts would be reduced to a **less-than-significant** level.

#### Incremental Noise from Project Operation

After Project construction is complete, no substantial noise level increase will occur from Project operational sources, in this case exclusively motor vehicle traffic. The noise increment added by the introduction of the motor vehicles from the NUSD office/maintenance facility (i.e., about 70-80 additional motor vehicle trips per day) as added to State Access Road and C Street would have minimal noise impact (i.e., a fraction of a dBA) to existing adjacent sensitive receptors.

#### **Mitigation Measures**

**Mitigation Measure NOI-1.** The following Best Management Practices shall be incorporated into the construction documents to be implemented by the Project contractor:

- Limit Project construction activity to between 7 a.m. and 6 p.m. on weekdays, to between 10 a.m. and 5 p.m. on Saturdays, and prohibit it on Sundays or official federal national holidays.
- Provide enclosures and noise mufflers for stationary equipment, shrouding or shielding for impact tools, and barriers around particularly noisy activity areas on the site.
- Use quietest type of construction equipment whenever possible, particularly air compressors.

- Provide sound-control devices on equipment no less effective than those provided by the manufacturer.
  - Locate stationary equipment, material stockpiles, and vehicle staging areas as far as practicable from sensitive receptors.
  - Prohibit unnecessary idling of internal combustion engines.
  - Require applicable construction-related vehicles and equipment to use designated truck routes when entering/leaving the site.
  - Designate a noise disturbance coordinator at NUSD who shall be responsible for responding to complaints about noise during construction. The telephone number of the noise disturbance coordinator shall be conspicuously posted at the construction site. Copies of the project purpose, description and construction schedule shall also be distributed to the surrounding residences, schools and library.
- b) There are no policies or standards in the *Novato General Plan 2035* for avoiding/reducing structural damage or annoyance from vibration impacts. However, it is most common for government agencies to rely on assessment methodologies, impact standards and vibration-reduction strategies developed by the Federal Transit Administration (FTA). According to the FTA, limiting vibration levels to 94 vibration decibels (VdB, a measure of vibration intensity similar to the dB for noise) or less would avoid structural damage to wood and masonry buildings (which are typical of most residential structures), while limiting vibration levels to 80 VdB or less at residential locations would avoid significant annoyance to the occupants.
- The most vibration-intensive piece of construction equipment is a pile driver, but no pile driving will be required for the Project. Other types of construction equipment are far less vibration-intensive. Next in intensity are heavily loaded trucks or large tracked earth-moving equipment, which could pose a damage or annoyance threat if they regularly and often come within 25 feet of a vibration-sensitive receptor during construction. But the closest existing vibration-sensitive uses to the Project construction sites are about 200 feet away. Thus, the potential for vibration annoyance/damage is **less than significant**.
- c) The Project site is about 6 miles south of Gness Field, a private aviation facility operated by the Marin County Department of Public Works. The *Novato General Plan 2035* (Chapter 4, *Living Well*, Section 5 *Noise*) presents noise contours for Gness Field (see Figure LW-5, *Existing Noise Contours for Gness Field Airport*). The Airport's 65 dBA contour (the common federal measure of significant impact from aircraft noise) closely follows (and is just outside) the Airport property and also comes no closer than about 6 miles from the Project site. Thus, the potential for annoyance to future Project site occupants from aircraft operation out of Gness Field Airport is **less than significant**.

### XIII. Population and Housing

Would the Project:

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

#### Discussion

- a) The proposed District GMO building would not directly increase population growth because there is no housing component and would not indirectly increase housing (through increased demand) because the Project would not, in itself, generate any new demand. No new permanent jobs would be generated by the project – each of the 15 employees are currently employed by the District and would be relocated into this building from existing facilities. The site and surrounding areas have been or are developed with urban land uses and no extensions of roads or other infrastructure would be required that would indirectly induce growth. Therefore, the project would not induce new development on nearby lands, and **no impact** would occur.
- b) The Project site is a mostly vacant uninhabited site. The proposed project would not displace existing housing or people, so there would be **no impact**.

## XIV. Public Services

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

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

### Discussion

- a) The City of Novato Fire Protection District (NFPD) provides fire protection and emergency medical services for the Project site. Fire protection to the project site is provided by the Novato Fire Protection District (NFPD). The NFPD operates five fire stations in Novato. Station 65 (Hamilton) located at 5 Bolling Drive, (approximately 0.5 miles away) is the nearest station to the project site. The station accommodates quarters for a 3-person Fire District Paramedic Engine Company (including one Captain, one Engineer and one Firefighter/Paramedic staff) and the 15-person Tam Fire Crew (part of Marin County Fire Department) during Wildland Fire Season. Station 65 also provides office space for law, enforcement partners (Novato Police, Marin County Sheriff, and California Highway Patrol) and the Marin County Coroner.

Implementation of the project may result in an incremental increased demand for fire protection services. However, the project is located on a site in a highly-developed area, in close proximity to existing fire protection services. The project would not require the provision of or need for new or physically altered facilities to continue to serve the project site. As a result, the project would not result in a substantial adverse physical impact nor would it substantially affect response times for fire services. The project's impact related to the provision of fire services would be **less than significant**.

- b) The City of Novato Police Department (NPD) provides police protection services for the Project site. The NPD station is located at 909 Machin Avenue, approximately 1.6 miles north of the Project site. The MVPD currently provides police protection to the Project area and would continue to provide service when the new building is constructed. The Project plans



would be reviewed by the NPD for safety provisions. Full emergency access to the site would be provided. Because there would be minimal demand for police protection services, the impact would be **less-than-significant**.

- c) The proposed facilities would not increase the population or otherwise increase demands for school services. Therefore, the Project would have **no impact** on schools.
- d) As described above, the proposed Project would not result in an increase in residents and therefore, would not increase demand for any parks facilities. For this reason, the project would be expected to have **no impact** to recreational facilities
- e) No other public facilities would be required by the proposed Project. Therefore, there would be no impact to other facilities.

## XV. Recreation

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

### Discussion

- a) As described in response to question d) under Public Services, above, the Project would have **no impact** on parks and other recreational facilities such that physical deterioration of the facility would occur or be accelerated.
- b) The project is a workshop, operations, and parking area. It would not construct any recreational facilities. Therefore **no impact** would occur.

**XVII. Transportation/Traffic**

Would the Project:

<b>Environmental Issue</b>	<b>Potentially Significant Impact</b>	<b>Less Than Significant with Mitigation</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?			X	
b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?			X	
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?				X
d) Substantially increase hazards due to design features (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?			X	
e) Result in inadequate emergency access?			X	

f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?				X
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## Discussion

a, b, d) Primary vehicular access to and from the site would be via the existing driveway from C Street. The project would generate about 60 daily trips from the 15 employees (at 4 trips per day per employee), totaling 60 trips per day, with a small number of additional trips (under 20/day) generated by other NUSD personnel visiting the site, deliveries, etc. Peak-hour trips would be under 20 trips in the AM and PM peak hours. This level of traffic would not have the potential to significantly affect traffic conditions on C Street, State Access Road, or any of the local or regional feeder streets that site workers may travel on. These trips would be relocated from trips to and from the existing GMO building elsewhere in Novato, so vehicle miles traveled are likely to not change substantially from existing levels. The minimal increase in traffic from the project would have no impact to any local or regional congestion management plans.

The project would use the existing driveway on C street, which has good sight distances and does not impose any hazardous conditions. The minimal traffic from the proposed Project also would minimize any hazards associated with project access. Therefore, project traffic and safety impacts would be **less than significant**.

- c) Gness Field, the Marin County owned and run airport is located approximately 7 miles north of the Project site. The proposed Project would not extend into the protected air space, would not create aviation safety hazards for persons residing or working in the Project vicinity, and would not be subject to airport noise issues. Therefore, it would have **no impact** on air traffic patterns.
- e) The Projects have been designed to allow adequate emergency access. The City of Novato Fire Protection District (NFPD) would review the Project plans for adequacy of emergency access. Any temporary lane closures during project construction would be subject to City of Novato review approval. Therefore, the Project would include adequate emergency access to the site and surrounding area. Impacts would be **less than significant**.
- f) The Project would have no effect on existing bus, bicycle and pedestrian access, therefore it would not conflict with any adopted plans, policies, or programs that address alternative transportation, and there would be **no impact**.

## XVIII. Tribal Cultural Resources

Would the project:

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

### Background

Solano Archaeological Services (SAS) has prepared a technical memorandum summarizing the background research, Native American community outreach, and findings for the Novato Unified School District (NUSD) Grounds, Maintenance and Operations Building Project (the Project). This included consultation with local Native American representatives regarding Tribal Cultural Resources. A cultural resources assessment of the site identified no known cultural resources on the site. (See Cultural Resources discussion for a summary of that study.)

## Discussion

- a) i., ii. On January 28, 2019, SAS mailed a letter describing the proposed Project and a project area map to the Native American Heritage Commission (NAHC). This contact was made on behalf of the NUSD to facilitate AB-52 consultation and requested a Sacred Land File search of the project area, and a list of Native American consultants who might have an interest in, or concerns with the Project. The NAHC responded by letter to SAS on February 13, 2019 indicating that sacred lands or other or other properties retaining cultural significance for the Native American community were known to be present within or near the project area.

The NAHC also forwarded a list of appropriate Native American tribal contacts. These consisted of Mr. Gene Buvelot, of the Federated Indians of Graton Rancheria, and Mr. Greg Sarris, Chairman of the Federated Indians of Graton Rancheria. SAS sent contact letters to both Mr. Buvelot, and Mr. Sarris on February 16, 2019. SAS continued to engage the Graton Rancheria by emailing Mr. Buvelot, Mr. Sarris, Buffy McQuillen (Tribal Historic Preservation Officer), and Antonette Tomic on February 22, 2019. On March 1, 2019, SAS telephoned and left voicemails for Mr. Buvelot, Mr. Sarris, and Ms. McQuillen. To date no response has been received. Should representatives from the Graton Rancheria reach out to SAS in the future for Project consultation, a report addendum will be issued summarizing the consultation efforts. On the basis of currently available information, this impact would be **less than significant**.

## XVII. Utilities and Service Systems

Would the Project:

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

### Background

The Novato Sanitary District (NSD) provides wastewater collection, treatment, and disposal services for the entire Novato community. The wastewater treatment plant is the Novato Treatment Plant, which is currently designed for an average dry weather flow of 7.05 million gallons per day (mgd) (NSD, 2008, revised 2012).

North Marin Water District (NMWD) supplies water to the City of Novato. In 2011, NSD and NMWD expanded a joint recycled water program and construction of new facilities was initiated at the Novato Treatment Plant to provide additional recycled water production capability.

### **Discussion**

- a, b, c) The project would generate wastewater that would be treated by NSD facilities. However, the project wastewater generation would be relocated from the District's existing facility in Novato, so there would be no net increased wastewater treatment demand. A new development project is required to pay a sewer connection fee, provide the fee structure for the installation and connection of sanitary sewers, regulate the discharge of waters and wastes into the public sewer systems. As a result, the project would have a **less-than-significant** impact related to wastewater treatment facilities.

Similarly, Project water use would be relocated from the existing facility in Novato, resulting in no or minimal net increase in NMWD water demand.

The project area is developed, and no substantial expansions or extensions of utility services would be required.

- d, e) Recology is Novato Sanitary District's new solid waste franchisee. They provide recycling, organics (green waste), and garbage collection services to the City of Novato. According to the General Plan, Novato's solid wastes are sent to the Redwood Landfill in Novato. Because the Project building would replace the District's existing GMO facility in Novato, there would be no net increase in solid waste generation as a result of the project, and there would be **no impact** on solid waste.



## XX. Wildfire Hazards

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

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

### Discussion

a, b, c) The project site is adjacent to developed urban uses and the nearest wildfire-hazard areas are several miles west of the site. Therefore, the project would have **no impact** with respect to wildfire hazards.

#### IV. MANDATORY FINDINGS OF SIGNIFICANCE

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

- a) The proposed tree removal could affect nesting habitat of special-status birds. This impact is mitigated to a **less-than-significant** level by mitigation measures in the Biological Resources section of this IS. The site is not likely to contain any known historic resources or prehistoric resources, as discussed above in Section V. Cultural Resources. Compliance with the mitigation measures for the unearthing of any unknown cultural resources would ensure all

potential impacts associated with cultural resources would be reduced to a **less-than-significant** level.

- b) The proposed Project would not result in cumulative impacts that could be cumulatively considerable and potentially affect the general public and the environment. According to data obtained from the City of Novato website, there are three projects that could contribute to cumulative conditions. These are:

Novato Village (a.k.a., 801 State Access Senior Apartments) is located on a 1.65-acre parcel located immediately north of the project site on the other side of Main Gate Road. As of January 2019, the project was under construction. The project includes a 48-unit apartment building for primary occupancy by senior residents aged 55 years and older. The project includes surface parking with 55-parking stalls, and various landscape and outdoor use amenities, including private balconies and porches, a central landscaped courtyard, and community garden for resident use.

C Street Village. Development of a 2.68-acre parcel at 970 C Street, south of the project site, with a two-story 32-unit co-housing project with townhomes and flats.

932 C Street. The North Bay Children's Center is proposing to replace their existing 13,055 sf child care center on a 1.34 +/- acre site located at 932 C Street, southeast of the project site, with a new 19,824 square-foot single-story childcare center and continue to offer a range of services from infant care to before and after school programs for school age children.

Remainder of Parcel 1A. As discussed above and shown in Figure 2, the remainder of Parcel 1A is owned by the District. In 2006, the District has planned to develop a charter high school and Food and Nutrition Services building on Parcel 1A as well as a building to house the District's maintenance/operations, grounds, construction, and warehouse departments. The impacts of and mitigation measures for this more comprehensive project were identified in a separate document published in June 2006: "Draft Mitigated Negative Declaration for PBC Parcels 1A and 1B." This document is on file at the District office. Currently there is no funding available for this larger project and the District is limiting development for the foreseeable future to the proposed GMO Building, which is the subject of this document.

However, because the Project would generate fewer than 70 ongoing daily trips that would significantly impact traffic, the Project would not significantly affect cumulative noise, or air quality in the study area or region, nor would that level of traffic contribute in a cumulatively considerable manner to any of those impacts. It is further noted that the trips would be relocated from trips to the District's existing GMO facility. Any projects with the potential for significant impacts would likewise require mitigation measures. Because the project

would not have a considerable contribution to the cumulative effects of other proposed projects in Novato, there would be a **less-than-significant impact**.

- c) The proposed Project would not increase long-term air pollutant emissions and greenhouse gasses because it would not add any net new workers – Project workers are currently working at District facilities elsewhere in Novato. Construction emissions would not be considered great enough to directly or indirectly have an adverse effect on residents living in the area, and mitigation measures would reduce any such emissions to less than significant levels. The Project's hazards to human health and safety would be less than significant, as described in Section VIII of this Initial Study. The impact would be **less than significant**.

## V. REFERENCES

Bay Area Air Quality Management District (BAAQMD). *California Environmental Quality Act Air Quality Guidelines*. May 2017.

BAAQMD. *Spare the Air, Cool the Climate*. April 2017.

BAAQMD. Air Quality Standards and Attainment Status. <http://www.baaqmd.gov/about-air-quality/research-and-data/air-quality-standards-and-attainment-status>

BAAQMD. Air Quality Summary Reports. <http://www.baaqmd.gov/about-air-quality/air-quality-summaries>

BAAQMD. Stationary Source Screening Analysis Tool. <http://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/ceqa-tools>

BAAQMD. Highway Screening Analysis Tool. <http://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/ceqa-tools>

BAAQMD. *Recommended Methods for Screening and Modeling Local Risks and Hazards*. May 2012.

California Air Resources Board (CARB). Summary: Diesel Particulate Matter Health Impacts. <https://ww2.arb.ca.gov/index.php/resources/summary-diesel-particulate-matter-health-impacts>

California Air Pollution Control Officers Association (CAPCOA). *California Emissions Estimator Model (CalEEMod) User's Guide*. <http://www.caleemod.com/>

California Native Plant Society (CNPS) Rare Plant Program. 2019. Inventory of Rare and Endangered Plants of California (online edition, v8-03 0.45). Website <http://www.rareplants.cnps.org> [accessed 31 January 2019].

California Natural Diversity Database (CNDDDB). 2018. California Department of Fish and Wildlife's CNDDDB Records within project vicinity. September 2018 database update.

City of Novato, *General Plan 2035*, <https://novato.org/home/showdocument?id=13576>

City of Novato, *General Plan Update, Existing Conditions Report*, (April 2014), Section 17 (Noise), <https://novato.org/home/showdocument?id=11284>

City of Novato, *Novato Municipal Code*, Chapter 19 (Zoning – General Performance Standards), Section 19-22.070 (Noise and Construction Hours) [https://library.municode.com/ca/novato/codes/code\\_of\\_ordinances?nodeId=CHXIXZO\\_ART3S1\\_PLGEDEST\\_DIV19.22GEPEST\\_19.22.070NOCOHO](https://library.municode.com/ca/novato/codes/code_of_ordinances?nodeId=CHXIXZO_ART3S1_PLGEDEST_DIV19.22GEPEST_19.22.070NOCOHO)

ECON, Revised Preliminary Environmental Assessment Report, Hamilton Elementary Schools Site (Parcel 1 A/B), State Access Road and C Street (Site Code 204114-11), October 21, 2013.

Federal Highway Administration (FHWA), *Roadway Construction Noise Model User's Guide*,

Federal Transit Administration (FTA). 2006. *Transit Noise and Vibration Impact Assessment*.  
[http://www.fta.dot.gov/documents/FTA\\_Noise\\_and\\_Vibration\\_Manual.pdf](http://www.fta.dot.gov/documents/FTA_Noise_and_Vibration_Manual.pdf)

Lakes Environmental, *SCREEN View User's Guide*.  
[https://www.weblakes.com/products/screen/resources/lakes\\_screen\\_view\\_user\\_guide.pdf](https://www.weblakes.com/products/screen/resources/lakes_screen_view_user_guide.pdf)

Office of Environmental Health Hazard Assessment (OEHHA). *Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments*, February 2015.

Jose Salcedo, Chief, Northern California Schools Unit, Brownfields and Environmental Restoration Program, letter to Mark Silva, Director of Maintenance, Operations, and Transportation, NUSD, January 27, 2015.

Miller Pacific Engineering Group, *Geotechnical investigation, Novato Unified School District-Maintenance Operations and Transportation Building, Novato, California*, January 11, 2019

US Department of the Navy. Covenant to Restrict Use of Property and Environmental Restrictions for Parcels 16, 18, 19, 21, 22, 23, 24, 25, and Portions of Parcels 17, 18, and 30 (aka "Exchange Triangle Parcel 1A) at department of Defense Housing Facility, Novato. Recorded November 18, 2011.

United States Fish and Wildlife Service. Information for Planning and Consultation (IPaC). 2019. USFWS Environmental Conservation Online System. Website  
<https://ecos.fws.gov/ipac/location/index> [accessed 31 January 2019].

## **VI. REPORT PREPARERS**

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**APPENDIX A: CULTURAL AND TRIBAL RESOURCES  
DOCUMENTATION**



**Native American  
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Native American  
Contacts List 11/27/2018**

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## NATIVE AMERICAN HERITAGE COMMISSION

Cultural and Environmental Department  
1550 Harbor Blvd., Room 100  
West Sacramento, CA 95691  
(916) 373-3710



November 27, 2018

Jason Coleman  
Solano Archaeological Services

Sent by Email: Jason@solanoarchaeology.com  
Number of Pages:

RE: Novato Highschool STEM and Performing Arts Center, Marin County

Dear Mr. Coleman:

A record search of the Native American Heritage Commission (NAHC) *Sacred Lands File* (SLF) was completed for the area of potential project effect (APE) for the above referenced project. **Sacred sites were identified in the project area provided.** Please contact the Federated Indians of Graton Rancheria directly for more information about potential sacred sites and tribal cultural resources within your APE.

**The absence of site information in the *Sacred Lands File* does not indicate the absence of Native American cultural resources in any APE.** Other sources of cultural resources information should be contacted regarding known and recorded sites. Please contact all of the people on the attached list. The list should provide a starting place to locate areas of potential adverse impact within the APE. I suggest you contact all of those listed, if they cannot supply information, they might recommend others with specific knowledge. **By contacting all those on the list, your organization will be better able to respond to claims of failure to consult under applicable laws.** If a response has not been received within two weeks of notification, the NAHC requests that you follow-up with a telephone call to ensure that the project information has been received.

If you receive notification of change of addresses and phone numbers from any of these individuals or groups, please notify me. With your assistance we are able to assure that our lists contain current information. If you have any questions or need additional information, please contact me at my email address: Sharaya.Souza@nahc.ca.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Sharaya Souza".

Sharaya Souza  
Staff Services Analyst  
(916) 573-0168

**CONFIDENTIALITY NOTICE:** This communication with its contents may contain confidential and/or legally privileged information. It is solely for the use of the intended recipient(s). Unauthorized interception, review, use or disclosure is prohibited and may violate applicable laws including the Electronic Communications Privacy Act. If you are not the intended recipient, please contact the sender and destroy all copies of the communication.

**NATIVE AMERICAN CONSULTATION LOG FOR  
NOVATO HS CENTER FOR THE SCIENCES AND CENTER FOR THE ARTS  
PROJECT**

<b>Native American Consultant</b>	<b>Date of Correspondence</b>	<b>Responses</b>
Buffy McQuillen, THPO	11/2/18	Emailed making transition to SAS from old archaeologist. SAS stated that once a full records search and NAHC Sacred Land File search were conducted that SAS would immediately give them the results.
	11/4/18	Ms. McQuillen asked if Ellen was no longer working on the project. SAS replied and said she has been replaced by SAS and not working on the project any longer.
	11/21/18	SAS emailed the records search results and asked for information regarding unrecorded sites in and adjacent to the project area.
	11/30/18	SAS emailed the NAHC results, indicating that both schools lie on Sacred Lands identified by the NAHC. The NAHC stated that the Graton Rancheria should be contacted for further information.
	12/3/18	SAS telephoned Ms. McQuillen and left a voicemail introducing myself and asking for a call back to discuss project recommendations and information on the Sacred Lands.
Antonette Tomic	11/2/18	Emailed making transition to SAS from old archaeologist. SAS stated that once a full records search and NAHC Sacred Land File search were conducted that SAS would immediately give them the results.
	11/21/18	SAS emailed the records search results and asked for information regarding unrecorded sites in and adjacent to the project area.
	11/30/18	SAS emailed the NAHC results, indicating that both schools lie on Sacred Lands identified by the NAHC. The NAHC stated that the Graton Rancheria should be contacted for further information.
Gene Buvelot	11/21/18	SAS emailed the records search results and asked for information regarding unrecorded sites in and adjacent to the project area.
	11/30/18	SAS emailed the NAHC results, indicating that both schools lie on Sacred Lands identified by the NAHC. The NAHC stated that the Graton Rancheria should be contacted for further information.

**MARIN COUNTY, CALIFORNIA**

SAS Contact: Jason A. Coleman, M.A., R.P.A.

## **APPENDIX B: COMMENTS AND RESPONSES ADDENDUM**

**(to be added in Final IS)**

## **APPENDIX C: MITIGATION MONITORING AND REPORTING PROGRAM**

**(to be added in Final IS)**