

# **APPENDIX A**

## **Notice of Preparation (NOP) and NOP Comment Letters**

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# **APPENDIX A.1**

Notice of Preparation (NOP)



# NOTICE OF PREPARATION CITY OF SAUSALITO 6<sup>TH</sup> CYCLE HOUSING ELEMENT PROGRAMS DRAFT ENVIRONMENTAL IMPACT REPORT

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**Date:** May 18, 2023  
**To:** State Clearinghouse, Agencies, Organizations and Interested Parties  
**From:** City of Sausalito Community Development Department  
**Subject:** Notice of Preparation and Scoping Meeting for the Draft Environmental Impact Report for City of Sausalito 6<sup>th</sup> Cycle Housing Element Programs  
**Scoping Meeting:** May 30, 2023 at 3pm (via Zoom – see pg.2 for information)  
**Comment Period:** May 22, 2023 to June 21, 2023

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NOTICE IS HEREBY GIVEN that the City of Sausalito (City), as the Lead Agency, has determined that the adoption of zoning amendments and other actions needed to implement Program 4 of the Sausalito Housing Element, "Ensure Inventory of Sites Accommodates RHNA throughout Planning Period" (collectively, the proposed project) will require preparation of an Environmental Impact Report (EIR) in compliance with the California Environmental Quality Act (CEQA). This Notice of Preparation (NOP) is being distributed to applicable responsible agencies, trustee agencies, interested agencies, parties, and organizations as required by CEQA. Interested agencies and parties are requested to comment on the scope and content of the significant environmental issues, mitigation measures, and reasonable alternatives to be explored in the Draft EIR. Information regarding the project description, project location, public outreach process, and topics to be addressed in the Draft EIR is provided below.

## Notice of Preparation 30-Day Comment Period

The City, as lead agency, is soliciting comments from responsible agencies, trustee agencies, public agencies, organizations, and members of the public regarding the scope and content of the Draft EIR, and the environmental issues and alternatives to be addressed in the Draft EIR. The City requests that responsible agencies, trustee agencies, interested parties, and the Office of Planning and Research respond in a manner consistent with Section 15082(b) of the CEQA Guidelines. Pursuant to Public Resources Code Section 21080.4, responsible agencies, trustee agencies, and the Office of Planning and Research must submit any comments in response to this notice no later than 30 days after receipt. In accordance with the time limits established by CEQA, the NOP public review period will begin on May 22, 2023 and end on June 21, 2023.

In the event that the City does not receive a response from any responsible or trustee agency by the end of the review period, the City may presume that the responsible agency or trustee agency has no response to make (CEQA Guidelines Section 15082(b)(2)). Please provide your written/typed comments (including name, affiliation, telephone number, and contact information) to the address shown below by 5:00 p.m. Friday, June 21, 2023. For additional information, please contact:

Brandon Phipps, Community and Economic Development Director  
City of Sausalito Community Development Department  
420 Litho Street  
Sausalito, CA 94965  
[bhipps@sausalito.gov](mailto:bhipps@sausalito.gov)

## Scoping Meeting

The City will hold a scoping meeting to: (1) inform the public and interested agencies about the proposed project, and (2) solicit public comment on the scope of the environmental issues to be addressed in the Draft EIR, as well as the range of alternatives to be evaluated. The date, time, and place of the Scoping Meeting is as follows:

### City of Sausalito 6<sup>th</sup> Cycle Housing Element Programs Draft EIR Scoping Meeting

May 30, 2023 at 3 PM

Join Zoom Meeting

<https://us02web.zoom.us/j/4052952836>

405 295 2836

One tap mobile: 669-444-9171

Meeting # 405 295 2836

## Project Location and Setting

The City is located in southern Marin County. The 2.1-square mile City is located on the shores of Richardson Bay with a population of 7,114 people in 2020. The City is bound by San Francisco Bay (Richardson Bay) to the east, Golden Gate National Recreation Area to the west and south, and unincorporated Marin County, including the community of Marin City to the north and northwest. See Figure 1, Regional Location Map.

## Project Description

State law requires the City to have and maintain a general plan with specific contents in order to provide a vision for the City's future and inform local decisions about land use and development, including issues such as circulation, conservation, and safety. The City's General Plan was updated and adopted in 2021. The City of Sausalito recently adopted a 6th Cycle Housing Element Update as an amendment to the Sausalito General Plan. The Housing Element update is mandated by state law. The Housing Element establishes goals, policies, and identifies future actions to address the existing and projected housing needs of Sausalito. The goals, policies, and actions are required by state law to plan for the regional housing targets allocated to Sausalito by ABAG and the Department of Housing and Community Development for the period of 2023 to 2031 and to affirmatively further fair housing.

The Housing Element is a planning document that identifies how the City would accommodate development of 724 total housing units that were included in the City's 6th Cycle Regional Housing Needs Allocation (RHNA), which are greater than the 5th Cycle RHNA of 79 units. This is due in part to the Bay Area region's overall allocation of 441,176 units from State Department of Housing and Community Development (HCD) being more than double the last Housing Element cycle's allocation, which was approximately 189,000 units. However, the City's adoption of the Housing Element did not implement specific changes to existing land use controls (e.g., zoning) or approve any physical development (e.g., construction of housing or infrastructure) that may be necessary to accommodate such development. As such, the adoption of the Housing Element did not result in any direct physical changes to the environment.

State housing element law required that the housing element include a list of programs and policies to allow development that would accommodate the City's 6th cycle RHNA. The project constitutes the actions necessary to implement Program 4 of the 6th Cycle Housing Element, entitled "Ensure Sites Inventory of Sites Accommodates RHNA throughout 6th Cycle Planning Period." The City's identified opportunity sites and RHNA strategy, as described in Program 4, would create a total capacity for development of 908 housing units, including a capacity for 647 units based on opportunity sites that would be subject to the program of rezoning as identified in the Housing Element. Sites proposed for rezoning include sites subject to a vote of the electorate under Ordinance 1022 and Ordinance 1128. Program 4 involves the City completing rezoning or adoption of overlay zones to allow densities at identified opportunity sites of 43-49 dwelling units/acre, 50-70 dwelling units/acre, or mixed use zoning of 43-49 dwelling units/acre with minimum of 85% residential required, to facilitate the development of a minimum of 724 housing units during the planning period. The project would include rezoning that accomplishes the following:

- A minimum of 4.07 acres zoned Housing--49 (minimum 43 du/ac and maximum 49 du/ac) to accommodate 30 very low, 16 low, 40 moderate, and 47 above moderate income units,
- A minimum of 2.57 acres zoned Housing- -70 (minimum 50 du/ac and maximum 70 du/ac) to accommodate 69 very low, 34 low, 13 moderate, and 18 above moderate income units, and
- A minimum of 10.16 acres zoned Mixed Use-49/85% (minimum 43 du/ac and maximum 49 du/ac, allow 100% residential, and requirement a minimum of 85% residential) to accommodate 122 very low, 69 low, 47 moderate, and 120 above moderate income units,
- A minimum of 0.33 acres zoned Mixed Use-70/85% (minimum 43 du/ac and maximum 49 du/ac, allow 100% residential, and require a minimum of 85% residential) to accommodate 11 moderate and 11 above moderate income units.
- Rezoning would be subject to requirements of Government Code Section 65583.2(h,i), including the following requirements:
  - Permit owner-occupied and rental multi-family uses by-right, consistent with Government Code Section 65583.2(i) for projects with 20% or more units affordable to lower income households
  - Permit a minimum density of 20 units per acre
  - Allow a minimum of 16 units per site
  - Accommodate at least 50 percent of the lower income need on sites designated for residential use only, except that the City may accommodate the very low and low income need on sites designated for mixed use if those sites allow 100 percent residential use and require residential use to occupy at least 50 percent of the floor area in a mixed-use project

Additionally, the City would undertake any necessary amendments to the General Plan, including the Land Use and Circulation Elements, and to the Zoning Ordinance as might be necessary to implement the above.

As part of this effort, the City will implement Program 8, entitled "Public Property Conversion to Housing," to address making publicly-owned sites available for development during the 2023-2031 planning period. The City will implement portions of Program 16, entitled "Zoning Ordinance Amendments," particularly the paragraphs that address design standards, height limits, streamlined ministerial review, historic preservation, and historic design guidelines to support removing

governmental constraints and making the sites identified by Program 4 available for development as envisioned by Program 4.

Development capacity under Program 4 is summarized in Table 1 and the Inventory of Existing Residential Sites and Opportunity Sites is shown in Figure 2. Sites that would be subject to rezoning are listed in Appendix D1 of the Housing Element. The entire Housing Element is available at <https://housingelementsmarin.org/city-of-sausalito>.

**Table 1. Development Capacity**

	Program 4 Capacity (Housing Element Realistic Capacity)					EIR Capacity	
	Extremely/ Very Low	Low	Moderate	Above Moderate	Total	Units	Non- residential Square Feet
<b>RHNA</b>	<b>200</b>	<b>115</b>	<b>114</b>	<b>295</b>	<b>724</b>		
Approved/Entitled Projects	3	7	6	7	23	23	-
Inventory of Existing Residential Sites, including Pending Projects	1	1	47	73	122	126	-1,584
ADU & SB 9 Projected Units	12	27	30	47	116	116	-
Opportunity Sites							
Housing – 43-49 du/ac	30	16	40	47	133	164	-
Housing – 50-70 du/ac	69	34	13	18	134	159	-3,310
Mixed Use 49/85%	122	69	47	120	358	465	25,856
Mixed Use 70/85%	0	0	11	11	22	23	-4,110
<b>Total</b>	<b>237</b>	<b>154</b>	<b>194</b>	<b>323</b>	<b>908</b>	<b>959</b>	<b>16,852</b>
<b>Surplus<sup>1</sup></b>	<b>37</b>	<b>94</b>	<b>67</b>	<b>-</b>	<b>148</b>		

- 1. HCD recommends buffer in the housing element inventory of at least 15 to 30 percent capacity more than required, especially to accommodate the lower income RHNA. A modest surplus also allows various sites identified in the Housing Element to identify at different income levels than those anticipated, while still maintaining an adequate supply of available sites.

### Required Approvals

Actions to be taken by the City to adopt and implement the proposed project include, but are not limited to:

- Adoption of General Plan amendments to redesignate the land uses for Opportunity Sites and to update elements for internal consistency,
- Rezoning of Opportunity Sites, and
- Adoption of Zoning Ordinance amendments to accommodate the Opportunity Sites.

### Draft EIR Analysis

The City will prepare an EIR for the Housing Element Programs project. The EIR will be prepared in accordance with CEQA, the CEQA Guidelines (Guidelines), relevant case law, and City procedures. No Initial Study will be prepared pursuant to Section 15063(a) of the CEQA Guidelines.

The Draft EIR for the project will incorporate by reference applicable portions of the certified City of Sausalito General Plan Update Draft EIR.

The EIR will analyze potentially significant impacts associated with adoption and implementation of the Housing Element. In particular, the EIR will focus on the project's increased development potential. The EIR will evaluate the full range of environmental issues contemplated under CEQA and the CEQA Guidelines as set forth in CEQA Guidelines Appendix G, except for specific topics identified below as having no impact. Where potentially significant or significant impacts are identified, the EIR will discuss mitigation measures to address the impact. At this time, the City anticipates that EIR sections will be organized in the following topical areas:

- **Aesthetic Resources** - The Draft EIR will describe the aesthetic implications of project implementation, including visual relationships to the surrounding vicinity and potential impacts on scenic vistas and resources, potential to conflict with regulations governing scenic quality, and light or glare impacts.
- **Air Quality** - The Draft EIR will describe the potential short- and long-term impacts of project implementation on local and regional air quality and air quality plans based on methodologies issued by the Bay Area Air Quality Management District (BAAQMD).
- **Biological Resources** - The Draft EIR will identify any potential impacts of 6th Cycle project implementation on biological resources, including special-status plant and animal species, riparian habitats, wetlands, other sensitive natural communities, migratory movement, and protected trees.
- **Historic, Cultural, and Tribal Cultural Resources** - The Draft EIR will describe project implementation impacts and mitigation associated with historic, archaeological, and tribal cultural resources.
- **Geology, Soils, and Paleontologic Resources** - The Draft EIR will describe the potential geotechnical implications of project implementation, including adverse effects associated with seismic activity, substantial soil erosion or loss of topsoil, stable, potentially unstable geologic units, and destruction of unique paleontologic resources or unique geological features.
- **Greenhouse Gases, Climate Change, and Energy** - The Draft EIR will include a greenhouse gas emissions analysis using the BAAQMD's methodology and thresholds for evaluating a project's greenhouse gas emissions and will address the potential for the project to conflict with an adopted plan or other regulations adopted for the purpose of reducing greenhouse gases. This section will also address anticipated energy consumption associated with buildout of the project, as well as proposed and or potential energy conservation measures.
- **Hazards and Hazardous Materials** - The Draft EIR will describe any existing and anticipated hazardous material activities and releases and any associated impacts of project implementation. Potential hazards impacts resulting from future construction will also be described.
- **Hydrology and Water Quality** - The Draft EIR will describe the effects of project implementation on storm drainage, water quality, groundwater resources, and the potential for flooding.

- **Land Use and Planning** - The Draft EIR will describe the potential impacts of project implementation related to land use and planning, including impacts due to conflict with land use plans, policies, or regulations adopted to avoid or mitigate an environmental effect.
- **Noise** - The Draft EIR will describe noise impacts and related mitigation needs associated with short-term construction and long-term operation (i.e., traffic, mechanical systems, etc.) associated with the project.
- **Population and Housing** - The Draft EIR will describe the anticipated effects of project implementation inducing unplanned population growth or displacing existing people or housing.
- **Public Services and Recreation** - The Draft EIR will describe the potential for project implementation to result in substantial adverse physical impacts on public services, including police, fire, and emergency medical services, schools, parks and recreation facilities, and other public facilities.
- **Transportation** - The Draft EIR will describe the transportation and circulation implications of project implementation, including impacts on the circulation system including transit, roadways, pedestrian and bicycle facilities, potential effects related to vehicle miles travelled, design or incompatible use hazards, and adequate emergency access.
- **Utilities/Service Systems** - The Draft EIR will describe project implementation effects related to new or expanded water supply, sewer and wastewater treatment, storm drainage, solid waste and recycling, electric, natural gas, and telecommunication infrastructure.
- **Wildfire** – The Draft EIR will describe project impacts related to emergency response/emergency evacuation plans, potential to exacerbate wildfire risks, and exposure to significant wildfire-related risks.

In addition to the potential environmental impacts noted above, the Draft EIR will evaluate potential cumulative impacts and potential growth-inducing effects associated with project implementation. The Draft EIR will also compare the impacts of the project to a range of reasonable alternatives, including a No Project alternative, and will identify an environmentally superior alternative.

### Environmental Topics Scoped from Further Analysis

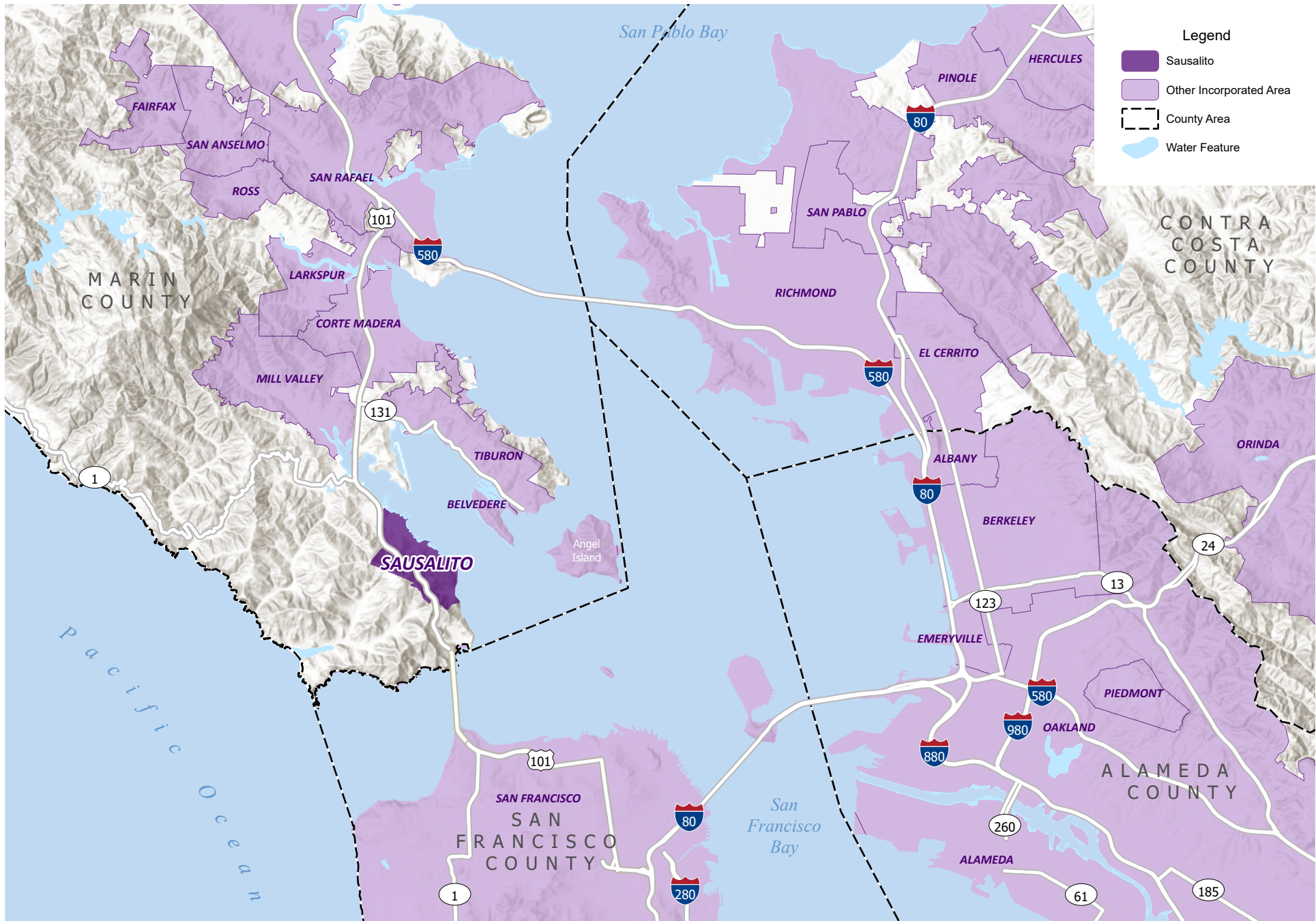
#### Agriculture and Forestry Resources

The EIR certified for the City's General Plan Update in 2021 concluded there would be no impacts to agriculture and forestry resources. No land zoned or used as agricultural resources, including farmland, forestry resources, or timberland are in the City. Therefore, no agricultural or forestry impacts would occur as a result of implementing the project and this issue will not be discussed in the EIR.

#### Mineral Resources

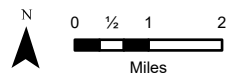
The EIR certified for the City's General Plan Update in 2021 concluded that there would be no impacts to mineral resources. No significant mineral resources have been identified in the City. None of the Opportunity Sites are used for mineral extraction, nor are any of the sites designated as an important mineral recovery site. Therefore, there would be no impact on mineral resources, and this impact will not be discussed in the EIR.





**Legend**

- Sausalito
- Other Incorporated Area
- County Area
- Water Feature



Sources: California State Geoportal. Map date: October 1, 2022.

**CITY OF SAUSALITO**  
**6th CYCLE HOUSING ELEMENT PROGRAMS**  
**FIGURE 1**  
**REGIONAL LOCATION MAP**



**LEGEND**

- Sausalito City Boundary
- Neighborhood Boundary
- Inventory Site**
- Inventory Site
- Opportunity Site**
- Housing-49
- Housing-70
- MU-49/85%
- MU-70/85%

CITY OF SAUSALITO  
6th CYCLE HOUSING ELEMENT PROGRAMS

**FIGURE 2**  
**INVENTORY AND OPPORTUNITY SITES AERIAL MAP**

*Sources: City of Sausalito; Marin GeoHub. Map date: February 16, 2023.*

## **APPENDIX A.2**

NOP Comment Letters – January 2023 Housing Element

## NATIVE AMERICAN HERITAGE COMMISSION

December 29, 2022

Brandon Phipps  
City of Sausalito  
420 Litho Street  
Sausalito, CA 94965

**Re: 2022120524, City of Sausalito 6<sup>th</sup> Cycle Housing Element Update Project, Marin County**

Dear Mr. Phipps:

The Native American Heritage Commission (NAHC) has received the Notice of Preparation (NOP), Draft Environmental Impact Report (DEIR) or Early Consultation for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code §21000 et seq.), specifically Public Resources Code §21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource, is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit.14, §15064.5 (b) (CEQA Guidelines §15064.5 (b))). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an Environmental Impact Report (EIR) shall be prepared. (Pub. Resources Code §21080 (d); Cal. Code Regs., tit. 14, § 5064 subd.(a)(1) (CEQA Guidelines §15064 (a)(1))). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources within the area of potential effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, "tribal cultural resources" (Pub. Resources Code §21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. (Pub. Resources Code §21084.2). Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code §21084.3 (a)). **AB 52 applies to any project for which a notice of preparation, a notice of negative declaration, or a mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements.** If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. §800 et seq.) may also apply.

The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments.

**Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.**

AB 52



CHAIRPERSON  
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Luiseño

VICE CHAIRPERSON  
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Chumash

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COMMISSIONER  
**[Vacant]**

COMMISSIONER  
**[Vacant]**

EXECUTIVE SECRETARY  
**Raymond C. Hitchcock**  
Miwok/Nisenan

**NAHC HEADQUARTERS**  
1550 Harbor Boulevard  
Suite 100  
West Sacramento,  
California 95691  
(916) 373-3710  
[nahc@nahc.ca.gov](mailto:nahc@nahc.ca.gov)  
[NAHC.ca.gov](http://NAHC.ca.gov)



Dec 30 2022

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

**1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project:**

Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:

- a. A brief description of the project.
- b. The lead agency contact information.
- c. Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code §21080.3.1 (d)).
- d. A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code §21073).

**2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report:** A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code §21080.3.1, subs. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or Environmental Impact Report. (Pub. Resources Code §21080.3.1 (b)).

- a. For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code §65352.4 (SB 18). (Pub. Resources Code §21080.3.1 (b)).

**3. Mandatory Topics of Consultation If Requested by a Tribe:** The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:

- a. Alternatives to the project.
- b. Recommended mitigation measures.
- c. Significant effects. (Pub. Resources Code §21080.3.2 (a)).

**4. Discretionary Topics of Consultation:** The following topics are discretionary topics of consultation:

- a. Type of environmental review necessary.
- b. Significance of the tribal cultural resources.
- c. Significance of the project's impacts on tribal cultural resources.
- d. If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code §21080.3.2 (a)).

**5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process:** With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code §6254 (r) and §6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code §21082.3 (c)(1)).

**6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document:** If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:

- a. Whether the proposed project has a significant impact on an identified tribal cultural resource.
- b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code §21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code §21082.3 (b)).

- 7. Conclusion of Consultation:** Consultation with a tribe shall be considered concluded when either of the following occurs:
- a.** The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
  - b.** A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code §21080.3.2 (b)).
- 8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document:** Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code §21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code §21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code §21082.3 (a)).
- 9. Required Consideration of Feasible Mitigation:** If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code §21084.3 (b). (Pub. Resources Code §21082.3 (e)).
- 10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:**
- a.** Avoidance and preservation of the resources in place, including, but not limited to:
    - i.** Planning and construction to avoid the resources and protect the cultural and natural context.
    - ii.** Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
  - b.** Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
    - i.** Protecting the cultural character and integrity of the resource.
    - ii.** Protecting the traditional use of the resource.
    - iii.** Protecting the confidentiality of the resource.
  - c.** Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
  - d.** Protecting the resource. (Pub. Resource Code §21084.3 (b)).
  - e.** Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code §815.3 (c)).
  - f.** Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code §5097.991).
- 11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource:** An Environmental Impact Report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:
- a.** The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code §21080.3.1 and §21080.3.2 and concluded pursuant to Public Resources Code §21080.3.2.
  - b.** The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
  - c.** The lead agency provided notice of the project to the tribe in compliance with Public Resources Code §21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code §21082.3 (d)).

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: [http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation\\_CalEPAPDF.pdf](http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf)

## SB 18

SB 18 applies to local governments and requires local governments to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code §65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: [https://www.opr.ca.gov/docs/09\\_14\\_05\\_Updated\\_Guidelines\\_922.pdf](https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf).

Some of SB 18's provisions include:

1. **Tribal Consultation**: If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code §65352.3 (a)(2)).
2. **No Statutory Time Limit on SB 18 Tribal Consultation**. There is no statutory time limit on SB 18 tribal consultation.
3. **Confidentiality**: Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code §65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code §5097.9 and §5097.993 that are within the city's or county's jurisdiction. (Gov. Code §65352.3 (b)).
4. **Conclusion of SB 18 Tribal Consultation**: Consultation should be concluded at the point in which:
  - a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
  - b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: <http://nahc.ca.gov/resources/forms/>.

### NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center ([https://ohp.parks.ca.gov/?page\\_id=30331](https://ohp.parks.ca.gov/?page_id=30331)) for an archaeological records search. The records search will determine:
  - a. If part or all of the APE has been previously surveyed for cultural resources.
  - b. If any known cultural resources have already been recorded on or adjacent to the APE.
  - c. If the probability is low, moderate, or high that cultural resources are located in the APE.
  - d. If a survey is required to determine whether previously unrecorded cultural resources are present.
2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
  - a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.
  - b. The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.

3. Contact the NAHC for:
  - a. A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
  - b. A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.
  
4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.
  - a. Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, §15064.5(f) (CEQA Guidelines §15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
  - b. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
  - c. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code §7050.5, Public Resources Code §5097.98, and Cal. Code Regs., tit. 14, §15064.5, subdivisions (d) and (e) (CEQA Guidelines §15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

If you have any questions or need additional information, please contact me at my email address:  
[Cody.Campagne@nahc.ca.gov](mailto:Cody.Campagne@nahc.ca.gov).

Sincerely,

*Cody Campagne*

Cody Campagne  
Cultural Resources Analyst

cc: State Clearinghouse



Dear Members of the Housing Element Advisory Committee:

You have preliminarily designated the former firehouse location near the top of Spencer Avenue for the Housing Element list. We object to this designation for the following reasons:

1. Spencer Avenue is a major artery for Sausalito's Emergency Evacuation Plan
  - a. Per Figure 2 below, Spencer Avenue is a major egress route for Zones SAU-E001 and E007 (Larger map included as Attachment 1). These two zones encompass roughly half of the city.

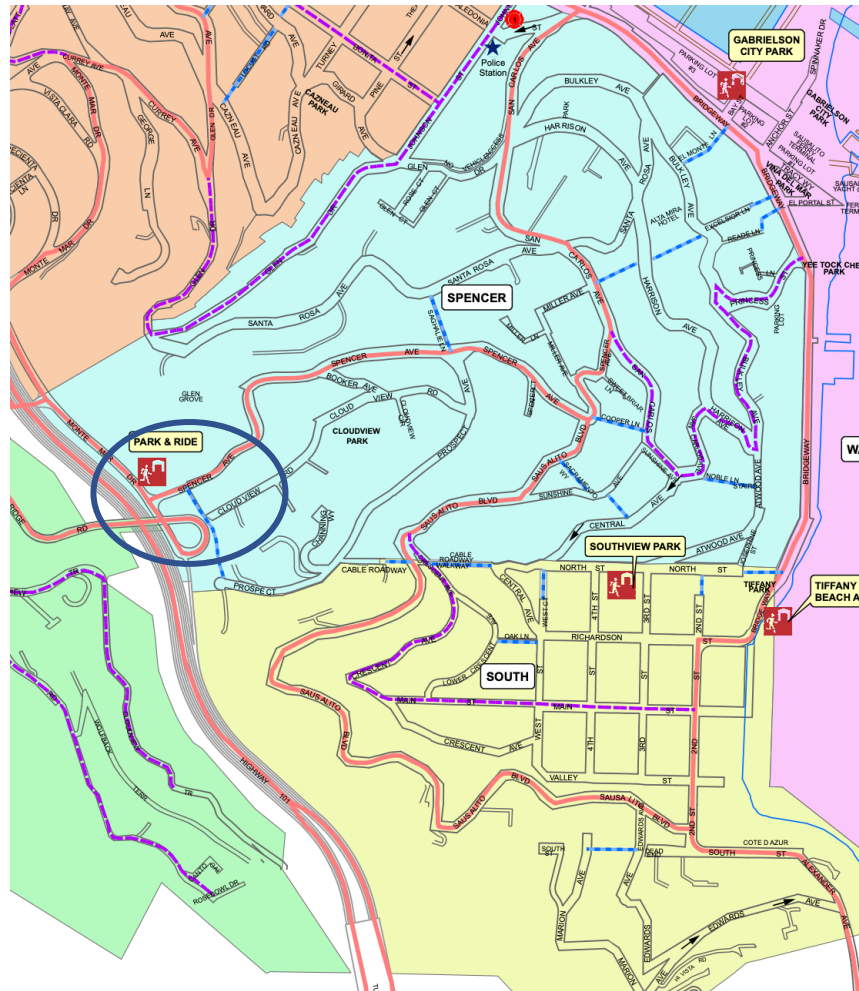


Figure 1 Primary Evacuation Routes Denoted in Pink

- b. Per the 1966 deed from the State of California, ingress and egress from the Firehouse location is restricted to Spencer Avenue (See Attachment 2, Deed).

- c. Your committee proposes to allow for a 24-unit development on the property. Assuming 1.5 cars per unit, up to 36 cars would be exiting the Firehouse site in an emergency evacuation. If one car could exit every 30 seconds, this would clog Spencer Avenue for an additional 18 critical minutes. This is a best-case scenario. Given the difficulty of seeing cars approaching from the northbound Highway 101 exit until they are under the Wolfback Road overpass, the likelihood of emergency vehicles massing at the bus parking lot and simply general confusion, making a right turn onto the extension of Spencer Avenue would take longer and the clog time could be greatly increased.
- d. Development bonuses would increase the size of the development and serve to make the emergency evacuation problem worse. With these bonuses, more than 80 cars could exit this site.
- e. The roads approaching Spencer are extremely narrow and often clogged:



#### Target for crime

- e. The police will tell you that criminals look for locations with easy access and alternate routes. Any development on the Spencer Firehouse property would meet these criteria.
  - f. It is a reason the Spencer Avenue area has a high incidence of break-ins. Our information is anecdotal as the Sausalito police do not maintain statistics, but a city inspector recently made sure to lock his car while inspecting a house in the area because he “heard there is a lot of crime in this neighborhood.”
2. Difficult site topography
- a. According to the Marin Map Site Parcel Report, the average slope for the site is 51.98. In Figure 3, the closer the lines, the steeper the slope.

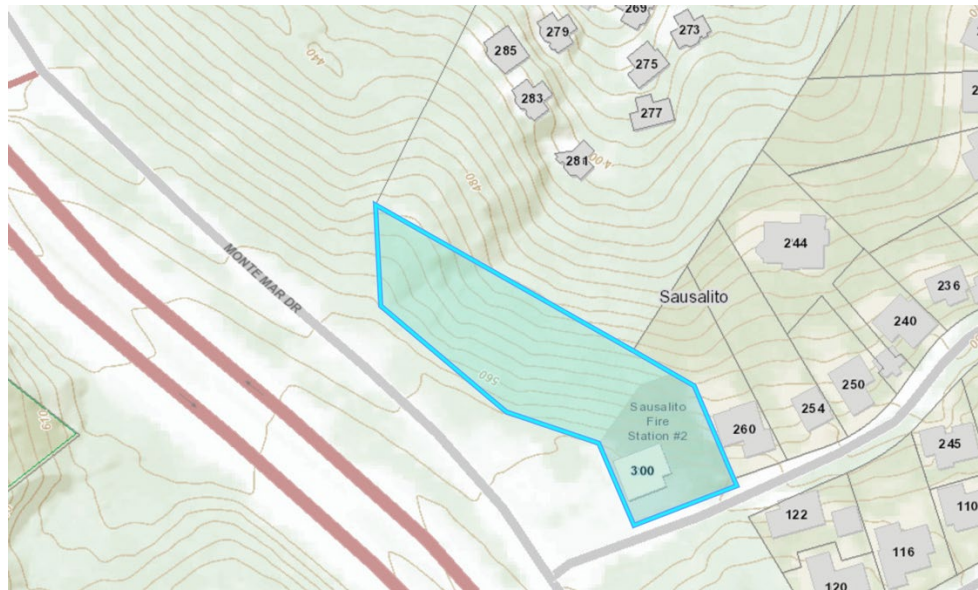


Figure 2 Rough topographical map of Spencer Firehouse

- b. During the last round of the Housing Element, the City Community development department excluded sites with large slopes due to the difficulty of development.
- c. Any development would kill a considerable number of trees.



3. Danger in locating housing near highways:

- a. In 2006, California air quality officials delivered a warning in the Air Resources Board's 2005 Handbook to cities and counties: Avoid putting new homes in high-pollution zones within 500 feet of freeways [LA Times: Freeway Pollution Travels Farther Than We Thought](#)

- b. The former firehouse at 300 Spencer Avenue is 150 feet from Highway 101.

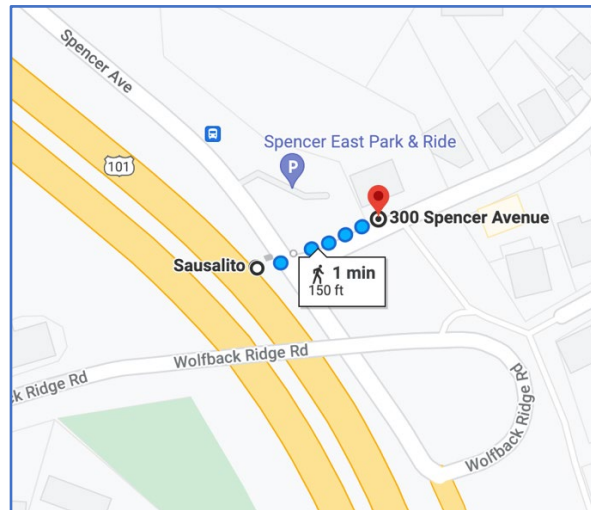


Figure 3 150 foot distance based on GPS measurement

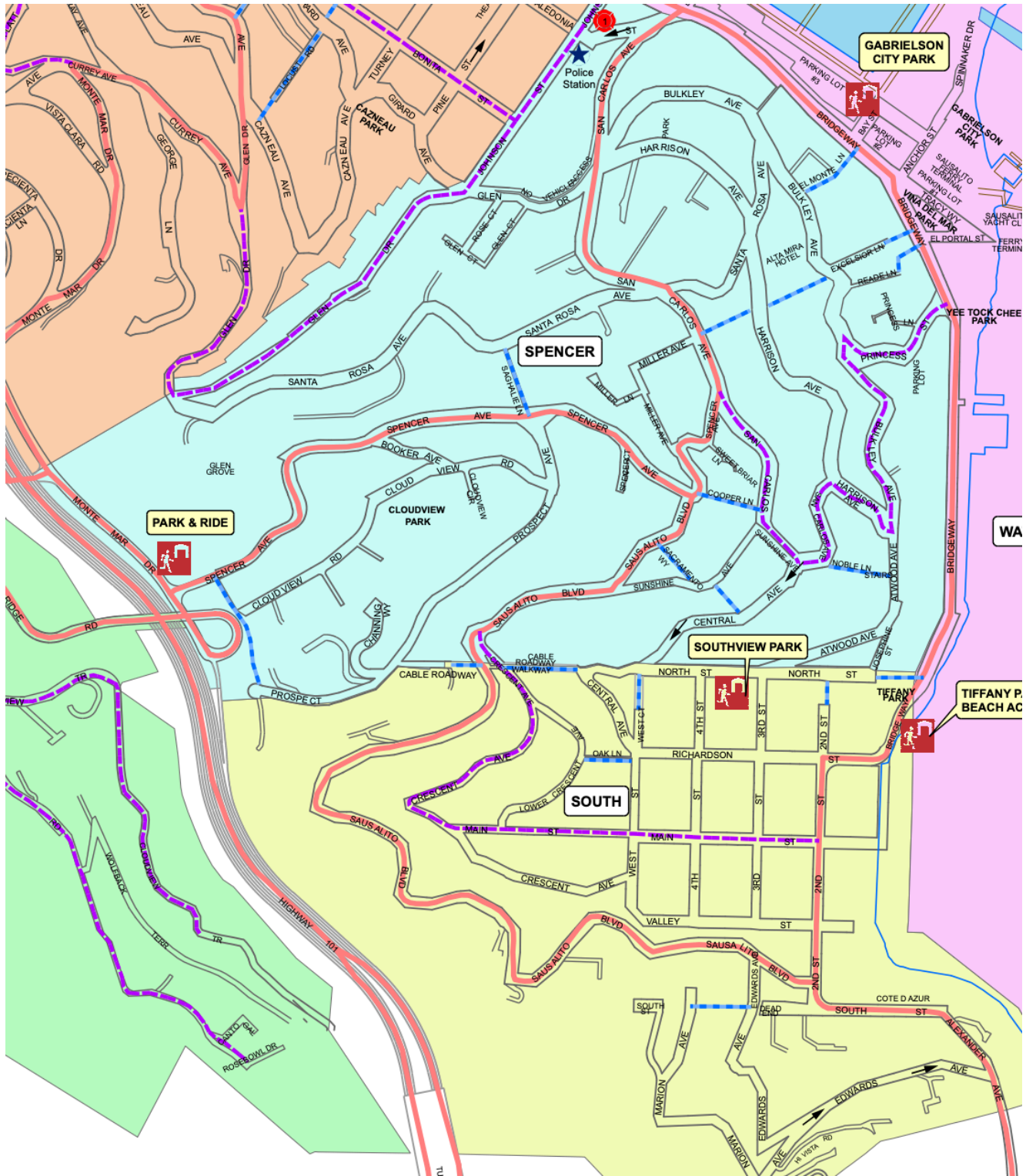
- c. The advisory added a warning to stay away from interchanges, intersections and other hot spots.
- The risk to health can be compounded if there are multiple pollution sources. One should avoid living close to highway interchanges and freeway ramps, which regulators and scientists have identified as hot spots that can hit residents with twice as much as pollution.
  - The Spencer Firehouse is located near both the on and off ramps for Highway 101.
- d. A higher percentage of electric vehicles will not solve the problem.
- Cars and trucks keep getting cleaner, but don't count on electric vehicles bringing an end to traffic-related health problems.
  - Switching to zero-emission vehicles only gets rid of tailpipe-generated pollution. It does nothing to reduce non-exhaust pollutants, including dust from brake pads and tires that contains toxic metals, rubber and other compounds that are kicked up into the air.
- e. Admittedly, in 2018 the Air Resources Board shifted its stance somewhat ([Regulators Shift Stance](#)) ...or did it?
- It issued a new advisory that emphasizes design rather than distance, recommending anti-pollution features such as air filters, sound walls and thick vegetation as "promising strategies" to reduce the health risks from freeways.
  - BUT...*

1. A professor of preventive medicine at USC said at the time that the air board's latest document presented best-case scenarios and overstated the extent to which air filters and other anti-pollution measures protect residents.
    - a. By recommending those steps, he said, state regulators "may give the false impression that it is now OK to put schools and residences close to freeways."
    - b. "The best current strategy to reduce near-freeway exposure is not to put schools and residences there in the first place," said the professor, who previously worked at the Air Resources Board. "Even with the best reduction measures available, air pollution in these locations will remain unhealthy."
  2. The deputy executive officer for the air board said in 2018 that the April advisory did not change the agency's 2005 recommendation to avoid siting homes within 500 feet of freeways. "That's a very basic health position that the agency has taken and we still stand by."
  3. State air regulators have said that their 2005 guidelines had not, in fact, been replaced. Air Resources Board officials said they decided to supplement them in light of new science on freeway pollution and the effectiveness of air filters and other measures.
  4. Filters remove only some of the harmful ingredients in traffic pollution. And they're effective only when the air is running and all doors and windows are closed. Most will not remove toxic exhaust gases such as benzene and 1,3-butadiene. To screen those out, you need more costly charcoal filters. ([LA Times: Freeway Pollution Travels Farther Than We Thought](#))
4. Several other sites have not been posted on the Housing Element List: the 711 site, the Alta Mira, the Alderman estate, 35 Central, etc.

In summary, the Spencer Firehouse site might appear as a good candidate for inclusion on the Housing Element. At a closer look, however, it fails to qualify and should be deleted.

Sincerely yours,  
John and Kate Flavin

Attachment ! Sausalito Evacuation Routes



OFFICIAL RECORDS COUNTY OF MARIN

22169

22169

RECORDED AT REQUEST OF

27

*City of Sausalito*  
 AT 25 MIN. PAST 12 P. M.  
 JUL 21 1966

Official Records of Marin County, Calif.

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*N. J. Luicomini*  
 RECORDER

NOTED IN 6703

SPACE ABOVE THIS LINE FOR RECORDER'S USE

DIRECTOR'S DEED

Sta. "D<sub>R</sub>" 108

DISTRICT	COUNTY	ROUTE	SECTION	NUMBER
04	Mrn	101	1.5	9147-DD

KNOW ALL MEN BY THESE PRESENTS:

That the STATE OF CALIFORNIA, acting by and through its Director of Public Works, does hereby grant to  
CITY OF SAUSALITO, a municipal corporation.

all that certain real property situate, lying and being in the City of Sausalito  
 County of Marin, State of California, described as follows, to-wit:

COMMENCING at the most easterly corner of that parcel of land described as "PARCEL ONE" of Deed No. 9147 to the State of California recorded November 2, 1953, in Volume 834 at Page 381, Official Records of Marin County; thence along the northerly line of Spencer Avenue as reconstructed, S. 88°22'49" W., 110.00 feet; thence N. 21°37'11" W., 91.80 feet; thence N. 71°46'25" W., 97.08 feet; thence N. 49°19'15" W., 159.55 feet; thence N. 5°09'35" W., 107.62 feet to the northeasterly line of the aforesaid State's parcel (834 OR 381); thence along last said line S. 59°53'34" E., 366.58 feet and S. 22°12'49" E., 110.70 feet, to the point of commencement.

CONTAINING 42,627 square feet, more or less.

EXCEPTING AND RESERVING unto the State of California any and all rights of ingress to or egress from the land herein

MAIL TAX STATEMENT TO;

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OFFICIAL RECORDS COUNTY OF MARIN

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conveyed over and across those courses described above with the lengths of 107.62 feet, 159.55 feet, 97.08 feet and 91.80 feet.

It is the purpose of the foregoing exception and reservation to provide that no easement of access shall attach or be appurtenant to the property hereby conveyed, by reason of the fact that the same abuts upon a public way and upon a State highway, with access only to the State highway being restricted.

The bearings and distances used in the above description are on the California Coordinate System, Zone 3. Multiply the above distances by 1.0000857 to obtain ground level distances.

Subject to special assessments if any, restrictions, reservations, and easements of record.

AND BE IT FURTHER KNOWN:

FIRST, the Director of Public Works has heretofore found and determined and does hereby find and determine, that the said lands were acquired for State Highway purposes and are no longer necessary, and are not now being used for highway uses or purposes;

SECOND, that this conveyance is executed pursuant to the authority vested in the Director of Public Works by law and, in particular, by the Streets and Highways Code.

WITNESS the hand of the Director of Public Works, and the seal of the Department of Public Works of the State of California, this 27th day of June, 1966

STATE OF CALIFORNIA  
DEPARTMENT OF PUBLIC WORKS

JOHN ERBECA  
DIRECTOR OF PUBLIC WORKS

By F. Bagshaw  
F. Fred Bagshaw  
Assistant Director

APPROVED AS TO FORM AND PRECEDENT

John Fullerton  
ATTORNEY  
DEPARTMENT OF PUBLIC WORKS

STATE OF CALIFORNIA  
COUNTY OF SACRAMENTO

On this 27th day of June, 1966, before me, NANCY C. SILVA, a Notary Public in and for the State of California,

residing therein, duly commissioned and sworn, personally appeared F. BAGSHAW, Director of the Department of Public Works of the State of California, known to me to be the person who executed the same on behalf of the State of California therein named and he acknowledged to me that the State of California executed the same.

WITNESS my hand and official seal.

NANCY C. SILVA  
NOTARY PUBLIC  
COUNTY OF SACRAMENTO  
My Commission Expires March 27, 1970

Nancy C. Silva  
Notary Public

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## EIR for Housing Element

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Chris Reynolds <creynoldsnj@yahoo.com>

Thu, Jan 5, 2023 at 8:11 AM

To: bphipps@sausalito.gov

Cc: heac@sausalito.gov, citycouncil@sausalito.gov, pc@sausalito.gov, Luke Lindenbusch <llindenbusch@sausalito.gov>, Beth Thompson <bthompson@denovoplanning.com>

Dear Director Phipps,

My wife and I are residents of 40 Marion Ave in Hurricane Gulch, a property that we have owned for 36 years, and that was owned and occupied by my father-in-law for 26 years prior to us. I am an architect with over 40 years experience in major design, planning and development projects around the world. I am firmly in favor of additional housing in Sausalito, providing it is done well and in appropriate locations that can support additional density. I have written separately to provide comment on the HE process generally, as well as in strong objection to the potential rezoning of opportunity site 100. I won't rehash those comments here, but offer the following feedback regarding EIR scope.

The list of criteria for EIR review, as presented by DeNovo, is excellent and quite comprehensive. I would point out several of those items as extremely critical to Sausalito overall, and to Hurricane Gulch in particular:

- Geology/Soils/Topography/Slope Stability - large portions of Sausalito consist of steep slopes that are prone to erosion and landslide, which would generally be inappropriate for densification.
- Hydrology/Water Runoff - the steep slopes create a challenge in terms of controlling water runoff in major seasonal storms such as we experienced last weekend, and are having more of this week. Uncontrolled runoff can only aggravate the risk of erosion and landslide. Also, seasonal water courses do provide for sanctuary and movement of desirable wildlife.
- Land Use/Planning - additional housing must only be created in locations that can support it, in terms of globally accepted land use and planning practice. This means that housing should not be forced into locations that do not have adequate vehicular access, parking, emergency services accessibility, or utility (power/water/sewer) capacity.
- Public Services - emergency service access and potential evacuation capability are challenging in many areas of Sausalito, including our area of Hurricane Gulch. Many roads are effectively one lane due to pinch points and street parking, which could significantly hamper response to any emergency, and may render timely evacuation difficult or impossible. Densification in any such areas only increases risk.
- Utilities/Service Systems - many parts of Sausalito are served by utility networks that are strained and might not handle additional load without prior upgrade. This is particularly true on steep hillsides where sewer and water networks are old, and many must pass through private property to be upgraded. This increases the difficulty of adding density in certain locations.
- Wildfire - the exposure to potential wildfire is a serious concern along the entire west and south boundaries of town, where properties exist in WUI zones abutting the GGNRA, which is effectively un-maintained. Adding density in WUI zones would increase the risk of future calamity, potentially involving loss of lives as well as property.
- Traffic - again, the narrow streets in many parts of Sausalito are fully loaded with vehicular traffic, and would not be capable of handling increased trips without prior upgrade.

With the above items as specific and serious concerns, it is still not clear to me exactly how the EIR review criteria will "trickle down" and be applied to specific opportunity sites within the HE plan. I asked this question in the Zoom meeting of Jan. 3, and the answer was that this will be explained in the draft EIR.

I await this explanation somewhat skeptically. A number of people in my neighborhood have been asking questions about the process, when certain decisions will be made, how individual sites will be deemed adequate (or not) for development/rezoning, who will make such decisions, and we have no solid answers many months into the process. This is intensely frustrating.

Sausalito needs housing; we all have a duty to create such housing in a focused and logical way. It should not be done haphazard, without careful attention to the opportunities or constraints of specific sites.

Thank you for your attention.

Regards,

Chris Reynolds  
415-887-8938



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

**GAVIN NEWSOM, Governor**  
**CHARLTON H. BONHAM, Director**



January 12, 2023

Brandon Phipps  
City of Sausalito  
420 Litho Street  
Sausalito, CA 94965  
[bhipps@sausalito.gov](mailto:bhipps@sausalito.gov)

Subject: City of Sausalito 6th Cycle Housing Element Update, Notice of Preparation of a Draft Program Environmental Impact Report, SCH No. 2022120524, Marin County

Dear Mr. Phipps:

The California Department of Fish and Wildlife (CDFW) reviewed the Notice of Preparation (NOP) of a Draft Program Environmental Impact Report (EIR) for the City of Sausalito 6th Cycle Housing Element Update (Project).

CDFW is providing the City of Sausalito as the Lead Agency, with specific detail about the scope and content of the environmental information related to CDFW's area of statutory responsibility that must be included in the EIR (Cal. Code Regs., tit. 14, § 15082, subd. (b)).

## **CDFW ROLE**

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

## **PROJECT DESCRIPTION AND LOCATION**

The Project site is the City of Sausalito in southern Marin County. The City of Sausalito is proposing to update the 2015 Housing Element of its General Plan, as mandated by Government Code section 65583. The update of the Housing Element would take into account changes in demography and housing needs and would result in the modification of policies in the Housing Element of the General Plan. There are no plans within the Housing Element to implement changes in zoning or affect any physical

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City of Sausalito  
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development within the city. As such, the proposed action would not result in any direct physical changes to the environment, but would result in reasonably foreseeable indirect changes such as rezoning sites to allow a mix of uses including residential, increasing densities on underutilized parcels, and development of Objective Design and Development Standards for single family and multiple unit development projects. Under the proposed action, 724 total housing units would be included in the City's 6th Cycle Regional Housing Needs Allocation (RHNA) which are greater than the 5th Cycle RHNA of 79 units.

The CEQA Guidelines (Cal. Code Regs., tit. 14, § 15000 et seq.) require that the EIR incorporate a full project description, including reasonably foreseeable future phases of the Project, that contains sufficient information to evaluate and review the Project's environmental impact (CEQA Guidelines, §§ 15124 & 15378). Please include a complete description of the following Project components in the Project description:

- Land use changes resulting from, for example, rezoning certain areas.
- Footprints of permanent Project features and temporarily impacted areas, such as staging areas and access routes.
- Area and plans for any proposed buildings/structures, ground disturbing activities, fencing, paving, stationary machinery, landscaping, and stormwater systems.
- Operational features of the Project, including level of anticipated human presence (describe seasonal or daily peaks in activity, if relevant), artificial lighting/light reflection, noise, traffic generation, and other features.
- Construction schedule, activities, equipment, and crew sizes.

The NOP identifies that the EIR will be a Program EIR. While Program EIRs have a necessarily broad scope, CDFW recommends providing as much information related to anticipated future activities as possible. CDFW recognizes that, pursuant to CEQA Guidelines section 15152, subdivision (c), if a Lead Agency is using the tiering process in connection with an EIR or large-scale planning approval, the development of detailed, site-specific information may not be feasible and can be deferred, in many instances, until such time as the Lead Agency prepares a future environmental document. This future environmental document would cover a project of a more limited geographical scale and is appropriate if the deferred information does not prevent adequate identification of significant effects of the planning approval at hand. The CEQA Guidelines section 15168, subdivision (c)(4) states, "Where the later activities involve site-specific operations, the agency should use a written checklist or similar device to document the evaluation of the site and the activity to determine whether the

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environmental effects of the operation were within the scope of the program EIR.” Based on CEQA Guidelines section 15183.3 and associated Appendix N Checklist, and consistent with other program EIRs, CDFW recommends creating a procedure or checklist for evaluating subsequent project impacts on biological resources to determine if they are within the scope of the Program EIR or if an additional environmental document is warranted. This checklist should be included as an attachment to the EIR. Future analysis should include all special-status species and sensitive habitat including but not limited to species considered rare, threatened, or endangered species pursuant to CEQA Guidelines, section 15380.

When used appropriately, the checklist should be accompanied by enough relevant information and reasonable inferences to support a “within the scope” of the EIR conclusion. For subsequent Project activities that may affect sensitive biological resources, a site-specific analysis should be prepared by a qualified biologist to provide the necessary supporting information. In addition, the checklist should cite the specific portions of the EIR, including page and section references, containing the analysis of the subsequent Project activities’ significant effects and indicate whether it incorporates all applicable mitigation measures from the EIR.

## **REGULATORY REQUIREMENTS**

### **California Endangered Species Act and Native Plant Protection Act**

Please be advised that a CESA Incidental Take Permit (ITP) must be obtained if the Project has the potential to result in “take” of plants or animals listed under CESA or NPPA, either during construction or over the life of the Project. Issuance of a CESA ITP is subject to CEQA documentation; the CEQA document must specify impacts, mitigation measures, and a mitigation monitoring and reporting program. If the Project will impact CESA listed species, such as those identified in **Attachment 1**, early consultation is encouraged, as significant modification to the Project and mitigation measures may be required in order to obtain a CESA ITP.

CEQA requires a Mandatory Finding of Significance if a project is likely to substantially restrict the range or reduce the population of a threatened or endangered species (Pub. Resources Code, §§ 21001, subd. (c) & 21083; CEQA Guidelines, §§ 15380, 15064, and 15065). Impacts must be avoided or mitigated to less-than-significant levels unless the CEQA Lead Agency makes and supports Findings of Overriding Consideration (FOC). The CEQA Lead Agency’s FOC does not eliminate the Project proponent’s obligation to comply with CESA.

### **Lake and Streambed Alteration Agreement**

CDFW will require an LSA Notification, pursuant to Fish and Game Code sections 1600 et. seq. for Project activities affecting lakes or streams and associated riparian habitat.

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Notification is required for any activity that will substantially divert or obstruct the natural flow; change or use material from the bed, channel, or bank including associated riparian or wetland resources; or deposit or dispose of material where it may pass into a river, lake or stream. Work within ephemeral streams, washes, watercourses with a subsurface flow, and floodplains are subject to notification requirements. CDFW, as a Responsible Agency under CEQA, will consider the CEQA document for the Project. CDFW may not execute the final LSA Agreement until it has complied with CEQA as a Responsible Agency.

### **Nesting Birds**

CDFW also has authority over actions that may disturb or destroy active nest sites or take birds. Fish and Game Code sections 3503, 3503.5, and 3513 protect birds, their eggs, and nests. Migratory birds are also protected under the federal Migratory Bird Treaty Act.

### **Fully Protected Species**

Fully Protected species, including any listed in **Attachment 1**, may not be taken or possessed at any time except for collecting these species for necessary scientific research, relocation of the bird species for the protection of livestock, or if they are a covered species whose conservation and management is provided for in a Natural Community Conservation Plan (Fish & G. Code, §§ 3511, 4700, 5050, & 5515).

### **ENVIRONMENTAL SETTING**

The EIR should provide sufficient information regarding the environmental setting (“baseline”) to understand the Project’s, and its alternative’s (if applicable), potentially significant impacts on the environment (CEQA Guidelines, §§ 15125 & 15360).

CDFW recommends that the CEQA document prepared for the Project provide baseline habitat assessments for special-status plant, fish and wildlife species located and potentially located within the Project area and surrounding lands, including but not limited to all rare, threatened, or endangered species (CEQA Guidelines, § 15380). The EIR should describe aquatic habitats, such as wetlands or waters of the U.S. or State, and any sensitive natural communities or riparian habitat occurring on or adjacent to the Project site (for sensitive natural communities see:

<https://wildlife.ca.gov/Data/VegCAMP/NaturalCommunities#sensitive%20natural%20communities>), and any stream or wetland set back distances the City may require. Fully protected, threatened or endangered, candidate, and other special-status species and sensitive natural communities that are known to occur, or have the potential to occur in or near the Project site, include but are not limited to those listed in **Attachment 1**.

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Habitat descriptions and the potential for species occurrence should include information from multiple sources: aerial imagery, historical and recent survey data, field reconnaissance, scientific literature and reports, U.S. Fish and Wildlife Service's (USFWS) Information, Planning, and Consultation System, and findings from "positive occurrence" databases such as California Natural Diversity Database (CNDDDB). Based on the data and information from the habitat assessment, the EIR should adequately assess which special-status species are likely to occur on or near the Project site, and whether they could be impacted by the Project.

CDFW recommends that prior to Project implementation, surveys be conducted for special-status species with potential to occur, following recommended survey protocols if available. Survey and monitoring protocols and guidelines are available at: <https://www.wildlife.ca.gov/Conservation/Survey-Protocol>.

Botanical surveys for special-status plant species, including those with a California Rare Plant Rank (<http://www.cnps.org/cnps/rareplants/inventory/>), must be conducted during the blooming period within the Project area and adjacent habitats that may be indirectly impacted by, for example, changes to hydrological conditions, and require the identification of reference populations.<sup>1</sup> More than one year of surveys may be necessary based on environmental conditions. Please refer to CDFW protocols for surveying and evaluating impacts to special status plants available at: <https://www.wildlife.ca.gov/Conservation/Plants>.

## **IMPACT ANALYSIS AND MITIGATION MEASURES**

The EIR should discuss all direct and indirect impacts (temporary and permanent) that may occur with implementation of the Project (CEQA Guidelines, § 15126.2). This includes evaluating and describing impacts such as:

- Land use changes that would reduce open space or agricultural land uses and increase residential or other land use involving increased development;
- Encroachments into riparian habitats, wetlands or other sensitive areas;
- Potential for impacts to special-status species;

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<sup>1</sup> CRPR 1B plants are considered rare, threatened, or endangered in California and elsewhere. Further information on CRPR ranks is available in CDFW's *Special Vascular Plants, Bryophytes, and Lichens List* (<https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=109383&inline>) and on the California Native Plant Society website (<https://www.cnps.org/rare-plants/cnps-rare-plant-ranks>).

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- Loss or modification of breeding, nesting, dispersal and foraging habitat, including vegetation removal, alternation of soils and hydrology, and removal of habitat structural features (e.g., snags, roosts, vegetation overhanging banks);
- Permanent and temporary habitat disturbances associated with ground disturbance, noise, lighting, reflection, air pollution, traffic or human presence; and
- Obstruction of movement corridors, fish passage, or access to water sources and other core habitat features.

The CEQA document should also identify reasonably foreseeable future projects in the Project vicinity, disclose any cumulative impacts associated with these projects, determine the significance of each cumulative impact, and assess the significance of the Project's contribution to the impact (CEQA Guidelines, §15355). Although a project's impacts may be insignificant individually, its contributions to a cumulative impact may be considerable; a contribution to a significant cumulative impact – e.g., reduction of available habitat for a special-status species – should be considered cumulatively considerable without mitigation to minimize or avoid the impact.

Based on the comprehensive analysis of the direct, indirect, and cumulative impacts of the Project, the CEQA Guidelines direct the lead agency to consider and describe all feasible mitigation measures to avoid potentially significant impacts in the EIR, and/or mitigate significant impacts of the Project on the environment (CEQA Guidelines, §§ 15021, 15063, 15071, 15126.2, 15126.4 & 15370). This includes a discussion of impact avoidance and minimization measures for special-status species, which are recommended to be developed in early consultation with CDFW, USFWS, and the National Marine Fisheries Service. These measures can then be incorporated as enforceable Project conditions to reduce potential impacts to biological resources to less-than-significant levels.

## **ENVIRONMENTAL DATA**

CEQA requires that information developed in EIRs and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations (Pub. Resources Code, § 21003, subd. (e)). Accordingly, please report any special-status species and natural communities detected during Project surveys to CNDDDB. The CNDDDB online field survey form and other methods for submitting data can be found at the following link:

<https://wildlife.ca.gov/Data/CNDDDB/Submitting-Data>. The types of information reported to CNDDDB can be found at the following link:

<https://wildlife.ca.gov/Data/CNDDDB/Plantsand-Animals>.

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City of Sausalito  
January 12, 2023  
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## FILING FEES

CDFW anticipates that the Project will have an impact on fish and/or wildlife, and assessment of filing fees is necessary (Fish & G. Code, § 711.4; Pub. Resources Code, § 21089). Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW.

If you have any questions, please contact Alex Single, Environmental Scientist, at (707) 799-4210 or [Alexander.Single@Wildlife.ca.gov](mailto:Alexander.Single@Wildlife.ca.gov); or Melanie Day, Senior Environmental Scientist (Supervisory), at (707) 210-4415 or [Melanie.Day@wildlife.ca.gov](mailto:Melanie.Day@wildlife.ca.gov).

Sincerely,

DocuSigned by:

*Erin Chappell*

B77E9A6211EF486...

Erin Chappell  
Regional Manager  
Bay Delta Region

Attachment 1: Special-Status Species

ec: State Clearinghouse # 2022120524



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 City of Sausalito  
 January 12, 2023  
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### Attachment 1: Special-Status Species

Scientific Name	Common Name	Status
<b>Amphibians &amp; Reptiles</b>		
<i>Rana draytonii</i>	California red-legged frog	FT, SSC
<i>Dicamptodon ensatus</i>	California giant salamander	SSC
<i>Rana boylei</i>	foothill yellow-legged frog - north coast DPS	SSC
<i>Emys marmorata</i>	western pond turtle	SSC
<b>Birds</b>		
<i>Rallus obsoletus obsoletus</i>	California Ridgway's rail	FE, SE, FP
<i>Laterallus jamaicensis coturniculus</i>	California black rail	ST, FP
<i>Strix occidentalis caurina</i>	northern spotted owl	FT, ST
<i>Riparia riparia</i>	bank swallow	ST
<i>Athene cunicularia</i>	burrowing owl	SSC
<i>Geothlypis trichas sinuosa</i>	saltmarsh common yellowthroat	SSC
<i>Melospiza melodia samuelis</i>	San Pablo song sparrow	SSC
<b>Plants</b>		
<i>Plagiobothrys diffusus</i>	San Francisco popcornflower	SE, CRPR 1B.1
<i>Pentachaeta bellidiflora</i>	white-rayed pentachaeta	FE, SE, CRPR 1B.1
<i>Clarkia franciscana</i>	Presidio clarkia	FE, SE, CRPR 1B.2
<i>Arctostaphylos montana</i> ssp. <i>ravenii</i>	Presidio manzanita	FE, SE, CRPR 2B.3
<i>Streptanthus glandulosus</i> ssp. <i>niger</i>	Tiburon jewelflower	FE, SE, CRPR 1B.2
<i>Holocarpha macradenia</i>	Santa Cruz tarplant	FT, SE, CRPR 1B.3

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<i>Arenaria paludicola</i>	marsh sandwort	FE, SE, CRPR 1B.2
<i>Lessingia germanorum</i>	San Francisco lessingia	FE, SE, CRPR 1B.2
<i>Castilleja affinis</i> var. <i>neglecta</i>	Tiburon paintbrush	FE, ST, CRPR 1B.2
<i>Layia carnosa</i>	beach layia	FT, ST, CRPR 1B.2
<i>Calochortus tiburonensis</i>	Tiburon mariposa-lily	FT, ST, CRPR 1B.1
<i>Hesperolinon congestum</i>	Marin western flax	FT, ST, CRPR 1B.1
<i>Arctostaphylos franciscana</i>	Franciscan manzanita	FE, CRPR 1B.1
<i>Trifolium amoenum</i>	two-fork clover	FE, CRPR 1B.2
<i>Plagiobothrys glaber</i>	hairless popcornflower	CRPR 1B.1
<i>Grindelia hirsutula</i> var. <i>maritima</i>	San Francisco gumplant	CRPR 1B.1
<i>Collinsia corymbosa</i>	round-headed Chinese-houses	CRPR 1B.1
<i>Kopsiopsis hookeri</i>	small groundcone	CRPR 1B.2
<i>Stebbinsoseris decipiens</i>	Santa Cruz microseris	CRPR 1B.2
<i>Arctostaphylos virgata</i>	Marin manzanita	CRPR 1B.2
<i>Chloropyron maritimum</i> ssp. <i>palustre</i>	Point Reyes salty bird's-beak	CRPR 1B.1
<i>Helianthella castanea</i>	Diablo helianthella	CRPR 1B.2
<i>Leptosiphon rosaceus</i>	rose leptosiphon	CRPR 1B.2
<i>Microseris paludosa</i>	marsh microseris	CRPR 1B.1
<i>Gilia millefoliata</i>	dark-eyed gilia	CRPR 1B.2
<i>Gilia capitata</i> ssp. <i>chamissonis</i>	blue coast gilia	CRPR 1B.1
<i>Cirsium andrewsii</i>	Franciscan thistle	CRPR 1B.1

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<i>Horkelia cuneata</i> var. <i>sericea</i>	Kellogg's horkelia	CRPR 1B.2
<i>Silene verecunda</i> ssp. <i>verecunda</i>	San Francisco campion	CRPR 1B.2
<i>Eriogonum luteolum</i> var. <i>caninum</i>	Tiburon buckwheat	CRPR 1B.2
<i>Triphysaria floribunda</i>	San Francisco owl's-clover	CRPR 2B.2
<i>Hemizonia congesta</i> ssp. <i>congesta</i>	congested-headed hayfield tarplant	CRPR 1B.1
<i>Polemonium carneum</i>	Oregon polemonium	CRPR 1B.2
<i>Collinsia multicolor</i>	San Francisco collinsia	CRPR 1B.2
<i>Plagiobothrys chorisianus</i> var. <i>chorisianus</i>	Choris' popcornflower	CRPR 1B.1
<i>Chorizanthe cuspidata</i> var. <i>cuspidata</i>	San Francisco Bay spineflower	CRPR 1B.2
<i>Horkelia marinensis</i>	Point Reyes horkelia	CRPR 1B.2
<i>Cirsium hydrophilum</i> var. <i>vaseyi</i>	Mt. Tamalpais thistle	CRPR 1B.3
<i>Amorpha californica</i> var. <i>napensis</i>	Napa false indigo	CRPR 1B.1
<i>Quercus parvula</i> var. <i>tamalpaisensis</i>	Tamalpais oak	CRPR 2B.2
<i>Silene scouleri</i> ssp. <i>scouleri</i>	Scouler's catchfly	CRPR 3.1
<i>Calystegia purpurata</i> ssp. <i>saxicola</i>	coastal bluff morning-glory	CRPR 1B.1
<i>Polygonum marinense</i>	Marin knotweed	CRPR 1B.2
<i>Horkelia tenuiloba</i>	thin-lobed horkelia	CRPR 1B.2
<i>Carex comosa</i>	bristly sedge	CRPR 2B.1
<i>Heteranthera dubia</i>	water star-grass	CRPR 2B.2
<i>Carex praticola</i>	northern meadow sedge	CRPR 2B.2
<i>Calamagrostis crassiglumis</i>	Thurber's reed grass	CRPR 2B.1
<b>Fish</b>		
<i>Oncorhynchus kisutch</i>	Coho salmon - central California coast ESU	FE, SE
<i>Oncorhynchus tshawytscha</i>	Central Valley winter Chinook salmon	FE, SE

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<i>Hypomesus pacificus</i>	delta smelt	FT, SE
<i>Spirinchus thaleichthys</i>	longfin smelt	FC, ST
<i>Eucyclogobius newberryi</i>	tidewater goby	FE
<i>Acipenser medirostris</i>	green sturgeon - southern DPS	FT
<i>Oncorhynchus mykiss</i>	steelhead - Central California Coast DPS	FT
<i>Acipenser medirostris</i>	southern green sturgeon	FT, SSC
<i>Acipenser transmontanus</i>	white sturgeon	SSC
<i>Entosphenus tridentata</i>	Pacific lamprey	SSC
<i>Pogonichthys macrolepidotus</i>	Sacramento splittail	SSC
<i>Cottus gulosus</i>	riffle sculpin	SSC
<i>Lampetra ayersi</i>	river lamprey	SSC
<i>Lavinia symmetricus symmetricus</i>	Central California roach	SSC
<b>Insects</b>		
<i>Icaricia icarioides missionensis</i>	Mission blue butterfly	FE
<i>Bombus occidentalis</i>	western bumble bee	SC
<i>Danaus plexippus plexippus</i>	monarch - California overwintering population	FC
<b>Mammals</b>		
<i>Reithrodontomys raviventris</i>	salt-marsh harvest mouse	FE, SE, FP
<i>Enhydra lutris nereis</i>	southern sea otter	FT, FP
<i>Taxidea taxus</i>	American badger	SSC
<i>Corynorhinus townsendii</i>	Townsend's big-eared bat	SSC

FP = state fully protected under Fish and Game Code; FE = federally listed as endangered under the Endangered Species Act (ESA); FT = federally listed as threatened under ESA; SE = state listed as endangered under CESA; ST = state listed as threatened under CESA; FC= Federal Candidate Species, SC = State Candidate Species; WL = CDFW Watch List; SSC = state Species of Special Concern; CRPR = California Rare Plant Rank; DPS = Distinct Population Segment; ESU = Evolutionarily Significant Unit

## **APPENDIX A.3**

NOP Comment Letters – Housing Element Programs Project

# San Francisco Bay Conservation and Development Commission

375 Beale Street, Suite 510, San Francisco, California 94105 tel 415 352 3600 fax 888 348 5190

State of California | Gavin Newsom – Governor | [info@bcdc.ca.gov](mailto:info@bcdc.ca.gov) | [www.bcdc.ca.gov](http://www.bcdc.ca.gov)

March 30, 2023

Megan Kirkeby  
Deputy Director  
Housing Policy Development  
State Department of Housing and Community Development  
Via Email: <megan.kirkeby@hcd.ca.gov>

## **SUBJECT: BCDC Comments for City of Sausalito’s 2023-2031 Housing Element**

Dear Deputy Director Kirkeby:

On February 27, 2023, the City of Sausalito (City) submitted its 2023-2031 Housing Element Update (Element) to the California Department of Housing and Community Development (HCD). Prior to adopting the Element on January 30, 2023, the City circulated a draft of the Element, dated August 12, 2022, for public comment. The San Francisco Bay Conservation and Development Commission (Commission or BCDC) submitted a comment on the proposed Element on September 16, 2022. This letter is to inform HCD that the City’s proposed Element is not consistent with state law and policy because it proposes residential uses on the San Francisco Bay in conflict with the McAteer-Petris Act (California Government Code 66600, et seq.<sup>1</sup>) the San Francisco Bay Plan, and principles of the public trust doctrine.

The San Francisco Bay Conservation and Development Commission is a State of California government agency located in the City of San Francisco with regulatory and planning responsibilities over San Francisco Bay, the Suisun Marsh, and along the Bay Area’s nine-county shoreline. BCDC is guided in its actions by two particular state laws under its charge, the McAteer-Petris Act and the Suisun Marsh Preservation Act, as well as the policies which further implement these laws, respectively, the San Francisco Bay Plan (including certain special plans which are part of the Bay Plan such as the Richardson Bay Special Area Plan) and the Suisun Marsh Protection Plan (and the locally-adopted Suisun Marsh Local Protection Program).

The McAteer-Petris Act empowers the Commission to act on a permit application for proposed placement of fill, extraction of materials, or any substantial change in use of any water, land or structure within the Commission’s jurisdiction. Further, Section 66605 lays out the requirements that must be met in order for the Commission to grant a permit for a project for which fill is proposed. Among these requirements include the requirements that: (a) fill is for a water-oriented use, (such as ports, water-related industry, airports, bridges, wildlife refuges, water-oriented recreation, and public assembly, water intake and discharge lines for desalinization plants and power generating plants requiring large amounts of water for cooling purposes); and (b) there is no alternative upland location for the fill.

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<sup>1</sup> All further statutory references in this letter are to the Government Code.



Residential uses – even in the form of liveaboard housing – are not water-oriented uses, and therefore fill in the Bay may not be used for a residential use under the terms of the McAteer-Petris Act. Published caselaw is clear on this point: “The Bay Plan, which is endorsed in the [McAteer-Petris] Act as the guiding document for Bay planning, makes clear that housing is not ordinarily a water-oriented use.” (*See Mein v. San Francisco Bay Conservation and Development Commission* (1990) 218 Cal.App.3d 727, 733-34 [referencing Other Uses of the Bay and Shoreline Finding c that a houseboat is not a water-oriented use, and Recreation Finding h that residential use is not water-oriented].) Furthermore, residential uses on the Bay are not consistent with the public trust doctrine.<sup>2</sup>

Goal H-2, Program 9 of the City’s Element, on Liveaboard Housing, provides for “[a]llowing marinas to increase their capacity of Liveaboard and houseboat berths by 5% (up to 15% total) and consider a rent control program for new berths to ensure that rents remain naturally affordable to lower and moderate income households.” This provision is inconsistent with state law, in that residential uses to provide affordable housing is not consistent with the McAteer-Petris Act and would not fit within any of the exceptions which may allow for minor fill for residential uses (see attached “BCDC Comments for the Public Review Draft of the City of Sausalito’s 2023-2031 Housing Element,” dated September 16, 2022).

In addition, several other actions provided in Program 9 of the Element, related to Live-Aboard Housing, provide for allocating existing live-aboard berths within recreational marinas for affordable housing. These elements may in whole or in part raise issues with the McAteer-Petris Act, San Francisco Bay Plan, Richardson Bay Special Area Plan, and the public trust doctrine for the reasons discussed above.

The City included responses to some of the Commission staff’s comments in its Response to Comments, dated January 30, 2023. The City did not substantively address the Element’s fundamental legal inconsistencies as also described above. While the Commission may amend the Bay Plan to modify the exceptions<sup>3</sup> to the general prohibition on fill for residential uses that provide for a portion of marinas to include liveaboard boats, the Commission may not amend the Bay Plan in violation of the McAteer-Petris Act and the public trust doctrine. Supporting affordable housing in the Bay Area is an important and worthwhile goal, but the McAteer-Petris Act establishes that residential uses should be located in upland and infill areas, and should not be developed on the San Francisco Bay.

We have attached the Commission staff’s comment letter of September 16, 2022, for additional context. Please contact Commission staff with any questions.

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<sup>2</sup> On this point, published caselaw has affirmed government’s responsibilities as trustee of the public trust: “the state or trustee has an affirmative duty to take the public trust into account in the planning and allocation of trust resources, and to protect public trust uses whenever feasible. Where the propriety of a governmental reallocation of trust land from one public use to another is placed in question, the seminal opinion in *Illinois Central* [(1892) 146 U.S. 387] makes clear that courts should look with considerable skepticism upon any governmental conduct which is calculated either to reallocate that resource to more restricted uses or to subject public uses to the self-interest of private parties.” (*San Francisco Baykeeper, Inc. v. State Lands Commission* (2015) 242 Cal.App.4th 202, 234.)

<sup>3</sup> In summary, the Bay Plan policies on Recreation provide that recreational marinas may be allowed a limited number of liveaboard boats, but that the number may not exceed ten percent of the total authorized boat berths unless the applicant can demonstrate clearly that a greater number of liveaboard boats is necessary to provide security or other use incidental to the marina use. In the past, BCDC has worked with local governments and relevant agencies to accommodate liveaboard anchor-out boats in Richardson Bay through various regulatory and planning solutions as part of the enforcement process, but has not indicated it would amend these Bay Plan policies to provide affordable housing.

State Department of Housing and Community Development  
BCDC Comments for the Sausalito Housing Element Update

Page 3  
March 30, 2023

Sincerely,

DocuSigned by:  
  
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ERIK BUEHMANN  
Planning Manager

cc: Greg Scharff, Chief Counsel, BCDC; greg.scharff@bcdc.ca.gov  
Jessica Fain, Planning Director, BCDC; jessica.fain@bcdc.ca.gov  
Luke Lindenbusch, Interim Housing Policy Planner, City of Sausalito; heac@sausalito.gov

EB / kr



# San Francisco Bay Conservation and Development Commission

375 Beale Street, Suite 510, San Francisco, California 94105 tel 415 352 3600 fax 888 348 5190

State of California | Gavin Newsom – Governor | [info@bcdc.ca.gov](mailto:info@bcdc.ca.gov) | [www.bcdc.ca.gov](http://www.bcdc.ca.gov)

September 16, 2022

*Via electronic mail only: [heac@sausalito.gov](mailto:heac@sausalito.gov)*

Luke Lindenbusch  
Interim Housing Policy Planner  
City of Sausalito  
Community Development Department  
420 Litho Street  
Sausalito, CA 94965

**SUBJECT: BCDL Comments for the Public Review Draft of the City of Sausalito’s 2023-2031 Housing Element**

Dear Luke Lindenbusch:

Thank you for the opportunity to review the Public Review Draft of the City of Sausalito’s (City) 2023-2031 Housing Element Update (Element), dated August 12, 2022. The goal of this letter is to highlight some San Francisco Bay Plan policies that are relevant to the Element. Specifically, the Element contains actions related to liveaboard boat berths in recreational marinas that raise issues under the San Francisco Bay Plan and the McAteer-Petris Act.

### **Increasing Liveaboard Boat Berths.**

Goal H-2, Program 9 of the Element, on Liveaboard Housing, provides for “[a]llowing marinas to increase their capacity of Liveaboard and houseboat berths by 5% (up to 15% total) and consider a rent control program for new berths to ensure that rents remain naturally affordable to lower and moderate income households.”

The McAteer-Petris Act empowers the Commission to grant a permit for placing fill, extracting materials, or making any substantial change in use of any water, land or structure within the Commission’s jurisdiction. Further, Section 66605 lays out the requirements that must be met in order for the Commission to issue a permit for a project for which fill is proposed. Among these requirements include the requirement that fill is for a water-oriented use, (such as ports, water-related industry, airports, bridges, wildlife refuges, water-oriented recreation, and public assembly, water intake and discharge lines for desalinization plants and power generating plants requiring large amounts of water for cooling purposes) and there is no alternative upland location for the fill. Residential uses are not water-oriented uses, and therefore fill in the Bay may not be used for a residential use under the terms of the McAteer-Petris Act. Furthermore, residential uses on the Bay are not consistent with the public trust.



Liveboard boats are defined pursuant to California Code of Regulations Section 10128 as “a boat that is not a transient boat, that is capable of being used for active self-propelled navigation, and that is occupied as a residence as that term is defined in California Government Code Section 244.” The Commission’s regulations define houseboats in Section 10127 as “a boat that is used for a residential or other nonwater-oriented purpose and that is not capable of being used for active navigation.”

The use of a marina for berthing recreational boats is a water-oriented use pursuant to the McAteer-Petris Act. However, the use of recreational boats in marina berths as a residence (i.e., a liveboard boats) is generally inconsistent with the requirements of the McAteer-Petris Act, the provisions of the San Francisco Bay Plan, and the public trust, in part, because liveboard boats constitute a residential use and are not a water-oriented use, and residential uses in the Bay generally have an alternative upland location. Notwithstanding this tenet, the San Francisco Bay Plan Recreation Policies provide that liveboard boat use at a recreational marina may be authorized by the Commission in limited circumstances as follows.

As described in the Bay Plan policies on Recreation, liveboard boats are “...designed and used for active navigation but are distinguished from other navigable boats in that they are also used as a primary place of residence. Although residential use is neither a water-oriented nor a public trust use, liveboard boats can be converted easily to a navigable, recreational use and, when properly located within a recreational boat marina, can provide a degree of security to the marina.”

The San Francisco Bay Plan Recreation Policy 3.c. further states:

“[L]ive-aboard boats should be allowed only in marinas and only if: (1) The number would not exceed ten percent of the total authorized boat berths unless the applicant can demonstrate clearly that a greater number of liveboard boats is necessary to provide security or other use incidental to the marina use; (2) The boats would promote and further the recreational boating use of the marina (for example, providing a degree of security), and are located within the marina consistent with such purpose; (3) The marina would provide, on land, sufficient and conveniently located restrooms, showers, garbage disposal facilities, and parking adequate to serve liveboard boat occupants and guests; (4) The marina would provide and maintain an adequate number of vessel sewage pumpout facilities in locations that are convenient in location and time of operation to all boats in the marina, particularly liveboard boats, and would provide the service free of charge or at a reasonable fee; and (5) There would be adequate tidal circulation in the marina to mix, dilute, and carry away any possible wastewater discharge. Liveboard boats moored in a marina on July 1, 1985, but unauthorized by the Commission, should be allowed to remain in the marina provided the tests of (2), (3), (4), and (5) above are met.

Where existing liveboard boats in a marina exceed ten percent of the authorized berths, or a greater number is demonstrated to be clearly necessary to provide security or other use incidental to the marina use, no new liveboard boats should be authorized until the number is reduced below that number and then only if the project is in conformance with tests (1), (2), (3), (4), and (5) above.”

Although the use of recreational vessels as residences is not a water-oriented use and is not consistent with the public trust, the Bay Plan Recreation policies provide for a limited exception for liveaboards within a recreational marina because the Commission has determined that the security benefits of up to ten percent of the total berths at a marina to be used as liveboard boats is incidental to the marina use (which is a public trust use) and in furtherance of a statewide purpose of providing security at the recreational facility.

Pursuant to the Bay Plan Recreation policies, a marina can apply to increase the allotment of liveboard boat berths over 10% of the total berths by demonstrating “clearly that a greater number of liveboard boats is necessary *to provide security or other use incidental to the marina use.*” (emphasis added). Providing additional housing to the City of Sausalito to provide affordable housing in order to meet the City’s Regional Housing Needs Allocation obligations would not satisfy this requirement. Providing housing is not a use incidental to the marina use and does not support a public trust use. As a result, this action, as described in the Element, would not be consistent with the San Francisco Bay Plan.

### **Other Liveboard Goals in the Element.**

Several other actions provided in Program 9 of the Element, related to Live-Aboard Housing, provide for allocating existing live-aboard berths within recreational marinas for affordable housing. These elements may in whole or in part be inconsistent with the Bay Plan and the public trust. Again, providing affordable housing, while a worthwhile goal, is not a use incidental to a marina use and does not support the public trust. We request that these actions be clarified that they only apply to liveaboards that are fully consistent with BCDC law and policy.

### **Regionwide Permits and Land-Based Housing.**

The Element includes proposed language intending to develop “a regionwide permit to streamline approvals within BCDC’s jurisdictional area for land-based housing that is consistent with the State-approved Regional Housing Needs Allocation. The permit will provide standards for such housing that may include identification of specific areas where permanent housing opportunities are permitted, requirements for housing developments to include access to the shoreline and water-based uses, a minimum percentage of the local waterfront workforce that will receive priority for new housing within the BCDC jurisdictional area, and requirements for local jurisdictions to identify in their Housing Elements that such housing is necessary to accommodate their RHNA in any given planning period.”

In the 100-foot shoreline band, BCDC may only deny a permit if the project does not provide maximum feasible public access consistent with the project, or if the project is not consistent with a Priority Use Area as described in the San Francisco Bay Plan. Pursuant to the California Code of Regulations Section 11700, BCDC may issue a regionwide permit for “a specific category or categories of activities that the Commission determines will have no substantial impact on areas within the Commission’s McAteer-Petris Act jurisdiction, including but not limited to routine repair and maintenance of existing structures.” Regionwide permits have lower permit fees than administrative permits and major permits, and are issued on an

expedited timeline. BCDC currently issues regionwide permits for the repair, reconstruction, and maintenance of single-family and multi-unit residential structures within the 100-foot shoreline band. New residential developments within the 100-foot shoreline band generally have substantial impacts to existing and future public access to the Bay and do not constitute routine repair and maintenance. A regionwide permit process would be unlikely to ensure that such a new residential development provides maximum feasible public access consistent with the project, as required by the McAteer-Petris Act and the San Francisco Bay Plan.

**Conclusion.**

Over the past several years, BCDC and the City have worked collaboratively on many issues, including, as outlined in the Element Background Report, solutions to support relocation of anchor-outs in Richardson Bay. BCDC acknowledges the City's desire, as outlined in the Element, to work with BCDC on issues of housing and liveaboard marinas. This comment letter is intended to provide the City with information on existing Bay Plan policies and the BCDC permit process, and welcomes the City to contact BCDC staff with any questions or to discuss any of the above-mentioned issues further.

Sincerely,

DocuSigned by:  
  
DE28A8DB779F45C...  
ERIK BUEHMANN  
Planning Manager

cc: Greg Scharff, Chief Counsel, BCDC, [greg.scharff@bcdc.ca.gov](mailto:greg.scharff@bcdc.ca.gov)  
Jessica Fain, Planning Director, BCDC, [jessica.fain@bcdc.ca.gov](mailto:jessica.fain@bcdc.ca.gov)

EB / rc

June 18, 2023

## **Public Comments for NOP for Draft EIR for 6<sup>th</sup> Cycle Housing Element Programs**

It says in the “Project Description” that the City of Sausalito is required to accommodate 724 new housing units, and that the Bay Area is somehow supposed to accommodate 441,176 new units (!).

That must be a pretty sophisticated algorithm to mandate so specific a number for this small finite geography. So, I would suggest that before we proceed, can we ask that sophisticated algorithm the crucial questions.....

What is the MAXIMUM number of housing units that this City, and this region, can accommodate?

And, more importantly, what is the OPTIMUM number? What is the right amount of people for this City, and this region, to accommodate? Certainly the algorithm must have taken into account that, when we have a few dry years in a row, we nearly run out of water for the amount of people we already have here now. And, when the weather gets a little warm, we nearly crash the electrical grid. Etc. And, if you’ve been out on the roads lately, California’s great “tragic commons,” perhaps you’ve noticed that when everything is working PERFECTLY, it just barely works, and when there is the slightest problem – an accident, road construction, bad weather, etc. – we find ourselves in a condition of intolerable beclustering.

AND, according to CalTRANS’ own website, “10 people a day die on California’s transportation network.” That is a HIGHER rate of death than US servicemen in Vietnam. Look it up. How do you imagine adding half a million housing units, irrespective of where the people occupying those units may need to travel everyday to their workplaces, to the Bay region will affect that number. Do you think it will go down? Or up?

I would suggest that a better, more reasonable, more logical, more just, more justifiable, etc., mandate from the State to cities would be: “You SHALL house your own essential workers.” Because if a particular city does not house its own essential workers – the workers without whom, BY DEFINITION, that city cannot function, then that city is dumping its traffic out into the region and adding significantly to the lethal, stressful, obnoxious regional traffic chaos. And, more actionably: Essential workers do NOT deserve to be subjected to the very real lethal jeopardy of the supercommute.

So, let's get that data, before we proceed. Who are Sausalito's essential workers? What do Sausalito's essential workplaces' commute maps look like? I wandered through the incredible opulent abundance of Mollie Stone's market of an early morning recently, and I couldn't help but notice that most of the faces behind the deli counter, behind the butcher counter, behind the coffee counter, etc., were Black and brown. Where do they live? If you are really committed to "affirmatively furthering fair housing" (MUST we speak euphemistically about these critical issues forever?), if Sausalito merely housed its own essential workers we would take giant strides towards actually being a more just, fair, efficient, resilient, socioeconomically integrated community.....or is Sausalito content to be a "sundown town"?

Also, some data we ought to get before we proceed would be: How is the housing stock that we already have being used? I can point to several houses that I know of in Sausalito that are very evidently occasionally to seldom occupied pied e terres. I could show you others that have been "under construction" – and very evidently unoccupied – for YEARS. Can we really say that we need to add more housing when we don't even know how the housing that already exists in this small finite geography is being used? Let's add THAT critical data to the conversation. Who owns it? Who occupies it? Let's find out, shall we?

Also, let's be cognizant of the fact that we SUBSIDIZE this state of affairs, to the tune of TRILLIONS of dollars. California's tragic commons has been in a perpetual state of expansion for over a century. Right now, we're spending about \$800 million to expand the "Novato narrows" of Highway 101 from Ignacio up to Corona Road in Petaluma. They want to replace Highway 37 at a cost of \$6-8 BILLION. This amounts to a subsidy for supercommutes. I would merely ask leaders, "planners," policy makers to consider: We might just as well – and probably even easier – subsidize people LIVING WHERE THEY WORK. Because whether you subsidize supercommutes for essential workers, or you subsidize them living where they work, YOU ARE ACHIEVING THE SAME THING.

In other words, the sole focus of policy and planning thus far seems to have been expanding roads and transit. The consensus of planners and policy makers seems to be, "Roads/car trips bad. Transit good." I would suggest those are two sides of the same coin, and might be described as "Traffic ACCOMMODATING Infrastructure" (TAI). What we haven't tried, what we need, here in Sausalito, in every "community" in every megalopolis, is a significant amount of "Traffic OBVIATING Infrastructure" (TOI). Those perfect little quaint scale houses of the Medeiros property peninsula bounded by Bridgeway, Filbert, and Easterby, for example (and including the Knudsen house), might be set aside and preserved as Zipcode Village Housing, dedicated and designated to house 94965 essential workers.

We need more Dorothy Gibson Houses, in other words, many more. They might be preserved and held in trust by a 94965 Community Land Trust, funded at least in part by the colossal "transportation/infrastructure/transit" budgets (because, like I said, they would be achieving the same thing – connecting workers to work -- and every full time essential worker housed in the zip code in which they work represents a de facto EXPANSION of roads and transit infrastructure, taking 10

supercommute trips a week, in most cases, off the strained to the breaking point tragic commons). Let's commit to shrinking our City's commute map as part of this effort, and getting back to being a true "Zip Code Village" once again, where people live in the zip code in which they work.

Finally, "Arbitrarily grow, indefinitely, everywhere" sounds suspiciously friendly to the bottom line of realtor groups, the Metrosexual Industrial Complex. Can the State, HCD, ABAG, etc., whoever is mandating this indefinite, arbitrary, perpetual growth reassure us that this mandate hasn't been unduly influenced – perhaps even corrupted – by realtor groups, before we proceed?

In other words, standing up to this patently arbitrary and ridiculous mandate is going to require local profiles in courage, in exactly the same way that it did when they were set to subdivide Marin's open spaces. "Developer" was still a dirty word around here when I was a kid, because they coveted Marin's pastoral open spaces, and they felt entitled to an absurdly generous living for providing what they perceived as the public "good" of paving paradise and putting up a parking lot. It required leaders to stand up for a GREATER public good to put a stop to it. The same moment is at hand: Do contemporary leaders have the courage to stand up to an industry that is going to insist that ALL housing must be available for their giddy real life game of Monopoly? To stand up for a greater good?

Thanks!

-Lito Brindle

[litobrindle@hotmail.com](mailto:litobrindle@hotmail.com)

[94965RHC@gmail.com](mailto:94965RHC@gmail.com)

415 519-7680

## California Department of Transportation

DISTRICT 4  
OFFICE OF REGIONAL AND COMMUNITY PLANNING  
P.O. BOX 23660, MS-10D | OAKLAND, CA 94623-0660  
[www.dot.ca.gov](http://www.dot.ca.gov)



June 21, 2023

SCH #: 2023050516  
GTS #: 04-MRN-2023-00291  
GTS ID: 29868  
Co/Rt/Pm: Marin/101/1.89

Brandon Phipps, Community & Economic Development Director  
City of Sausalito  
420 Litho Street  
Sausalito, CA 94965

### **Re: City of Sausalito 6th Cycle Housing Element Programs– Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR)**

Dear Brandon Phipps:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the City of Sausalito 6th Cycle Housing Element Programs. We are committed to ensuring that impacts to the State's multimodal transportation system and to our natural environment are identified and mitigated to support a safe, sustainable, integrated and efficient transportation system. The following comments are based on our review of the May 2023 NOP.

#### **Project Understanding**

This project constitutes the actions necessary to implement Program 4 of the 6th Cycle Housing Element. Program 4 would create a total capacity for development of 908 housing units, including a capacity for 647 units based on opportunity sites that would be subject to the program of rezoning as identified in the Housing Element. This program involves the city completing rezoning or adoption of overlay zones to allow densities at identified opportunity sites.

#### **Travel Demand Analysis**

With the enactment of Senate Bill (SB) 743, Caltrans is focused on maximizing efficient development patterns, innovative travel demand reduction strategies, and multimodal improvements. For more information on how Caltrans assesses Transportation Impact Studies, please review Caltrans' Transportation Impact Study Guide ([link](#)).



If the project meets the screening criteria established in the City's adopted Vehicle Miles Traveled (VMT) policy to be presumed to have a less-than-significant VMT impact and exempt from detailed VMT analysis, please provide justification to support the exempt status in alignment with the City's VMT policy. Projects that do not meet the screening criteria should include a detailed VMT analysis in the DEIR, which should include the following:

- VMT analysis pursuant to the City's guidelines. Projects that result in automobile VMT per capita above the threshold of significance for existing (i.e. baseline) city-wide or regional values for similar land use types may indicate a significant impact. If necessary, mitigation for increasing VMT should be identified. Mitigation should support the use of transit and active transportation modes. Potential mitigation measures that include the requirements of other agencies such as Caltrans are fully enforceable through permit conditions, agreements, or other legally-binding instruments under the control of the City.
- A schematic illustration of walking, biking and auto conditions at the project site and study area roadways. Potential traffic safety issues to the State Transportation Network (STN) may be assessed by Caltrans via the Interim Safety Guidance ([link](#)).
- The project's primary and secondary effects on pedestrians, bicycles, travelers with disabilities and transit performance should be evaluated, including countermeasures and trade-offs resulting from mitigating VMT increases. Access to pedestrians, bicycle, and transit facilities must be maintained.

### **Integrated Transportation and Land Use Planning**

Please review and include the reference to the current California Transportation Plan (CTP) in the DEIR. CTP 2050 envisions that the majority of new housing located near existing housing, jobs, and transit, and in close proximity to one another will reduce vehicle travel and GHG emissions, and be accessible and affordable for all Californians, including disadvantaged and low-income communities. The location, density, and affordability of future housing will dictate much of our future travel patterns, and our ability to achieve the vision outlined in CTP 2050.

Caltrans looks forward to reviewing the DEIR that should demonstrate how the proposed Housing Element Programs align with the City of Sausalito's adopted VMT policies. Caltrans encourages the City of Sausalito to consider and explore the potential of excess state-owned property for affordable housing development, per Executive Order N-06-19.

Brandon Phipps, Community & Economic Development Director

June 21, 2023

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### **Climate Change Adaptation**

In the 2020 Caltrans District 4 Adaptation Priorities Report, US-101 stretching through the city is identified as a high-priority Caltrans asset vulnerable to sea level rise, storm surge, and climate change impacts, including increased precipitation. Caltrans would like to be included in discussions, to stay informed as Caltrans is interested in engaging in multi-agency collaboration early and often, to find multi-benefit solutions that protect vulnerable shorelines, communities, infrastructure, and the environment. Please contact Vishal Ream-Rao, Caltrans Bay Area Climate Change Planning Coordinator, with any questions at [vishal.ream-rao@dot.ca.gov](mailto:vishal.ream-rao@dot.ca.gov).

Thank you again for including Caltrans in the environmental review process. Should you have any questions regarding this letter, or for future notifications and requests for review of new projects, please email [LDR-D4@dot.ca.gov](mailto:LDR-D4@dot.ca.gov).

Sincerely,

A handwritten signature in black ink that reads "Luo Yunsheng". The signature is written in a cursive, flowing style.

YUNSHENG LUO

Acting District Branch Chief  
Local Development Review

c: State Clearinghouse



Christina Erwin <cerwin@denovoplanning.com>

# FW: NOP for the City of Sausalito 6th Cycle Housing Element Programs Question

1 message

**Brandon Phipps** <bhipps@sausalito.gov>

Tue, May 30, 2023 at 3:12 PM

To: Beth Thompson <bthompson@denovoplanning.com>, Christina Erwin <cerwin@denovoplanning.com>, Sergio Rudin <SRudin@bwslaw.com>

Comment re: HE EIR NOP.



**BRANDON PHIPPS**

**Community & Economic Development Director**

City of Sausalito | Community Development Department

[420 Litho Street, Sausalito, CA 94965](#)

Direct: (415) 289-4142 | Cell: (628) 288-9697 | Fax: (415) 289-4167

**From:** Single, Alexander(Alex)@Wildlife <[Alexander.Single@Wildlife.ca.gov](mailto:Alexander.Single@Wildlife.ca.gov)>

**Sent:** Thursday, May 25, 2023 3:19 PM

**To:** Brandon Phipps <[bhipps@sausalito.gov](mailto:bhipps@sausalito.gov)>

**Subject:** NOP for the City of Sausalito 6th Cycle Housing Element Programs Question

Hello Mr. Phipps,

I'm preparing a comment letter for the NOP for the City of Sausalito 6th Cycle Housing Element Programs, and I will likely write comments on the EIR. I have a question about opportunity sites 39 and 301 in the New Town neighborhood. Are these areas proposed to be filled, or would the zoning change apply to houseboats or other floating infrastructure? Happy to meet or have a phone call if that's easier.

Thank you,

**Alex Single** (He)

Environmental Scientist (Solano and Marin Counties)

California Department of Fish and Wildlife Bay Delta Region (Region 3)

[2825 Cordelia Road, Suite 100](#)

[Fairfield, CA 94534](#)

[\(707\) 799-4210](#)



State of California – Natural Resources Agency

DEPARTMENT OF FISH AND WILDLIFE

Bay Delta Region

2825 Cordelia Road, Suite 100

Fairfield, CA 94534

(707) 428-2002

[www.wildlife.ca.gov](http://www.wildlife.ca.gov)

**GAVIN NEWSOM, Governor**

**CHARLTON H. BONHAM, Director**



June 14, 2023

Brandon Phipps

City of Sausalito

420 Litho Street

Sausalito, CA 94965

[BPhipps@sausalito.gov](mailto:BPhipps@sausalito.gov)

Subject: City of Sausalito 6th Cycle Housing Element Programs, Notice of Preparation of a Draft Environmental Impact Report, SCH No. 2023050516, City of Sausalito, Marin County

Dear Mr. Phipps:

The California Department of Fish and Wildlife (CDFW) received a Notice of Preparation (NOP) of a Draft Environmental Impact Report (EIR) from the City of Sausalito (City) for City of Sausalito 6th Cycle Housing Element Programs Project (Project).

CDFW is providing the City, as the Lead Agency, with specific detail about the scope and content of the environmental information related to CDFW's area of statutory responsibility that must be included in the EIR (Cal. Code Regs., tit. 14, § 15082, subd. (b)).

## **CDFW ROLE**

CDFW is a **Trustee Agency** with responsibility under the California Environmental Quality Act (CEQA) for commenting on projects that could impact fish, plant, and wildlife resources (Pub. Resources Code, § 21000 et seq.; Cal. Code Regs., tit. 14, § 15386). CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species. (Fish & G. Code, § 1802). CDFW is also considered a **Responsible Agency** if a project would require discretionary approval, such as a permit pursuant to the California Endangered Species Act (CESA) or Native Plant Protection Act (NPPA), the Lake and Streambed Alteration (LSA) Program, and other provisions of the Fish and Game Code that afford protection to the State's fish and wildlife trust resources. For purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources. Pursuant to our authority, CDFW has the following concerns, comments, and recommendations regarding the Project.

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## **REGULATORY REQUIREMENTS**

### **California Endangered Species Act and Native Plant Protection Act**

Please be advised that a CESA Incidental Take Permit (ITP) must be obtained if the Project has the potential to result in “take” of plants or animals listed under CESA or NPPA, either during construction or over the life of the Project. Under CESA, “take” means “hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill.” (Fish & G. Code, § 86). If the Project will impact CESA listed species, such as those identified in **Attachment 1**, early consultation is encouraged, as significant modification to the Project and mitigation measures may be required in order to obtain a CESA ITP. CDFW’s issuance of an ITP is subject to CEQA and to facilitate Permit issuance, any such project modifications and mitigation measures must be incorporated into the EIR’s analysis, discussion, and mitigation monitoring and reporting program.

CEQA requires a Mandatory Finding of Significance if a project is likely to substantially restrict the range or reduce the population of a threatened or endangered species (Pub. Resources Code, §§ 21001, subd. (c) & 21083; CEQA Guidelines, §§ 15380, 15064, & 15065). In addition, pursuant to CEQA, the Lead Agency cannot approve a project unless all impacts to the environment are avoided or mitigated to less-than-significant levels, or the Lead Agency makes and supports Findings of Overriding Consideration (FOC) for impacts that remain significant despite the implementation of all feasible mitigation. FOC under CEQA; however, do not eliminate the Project proponent’s obligation to comply with the Fish and Game Code.

### **Lake and Streambed Alteration**

An LSA Notification, pursuant to Fish and Game Code sections 1600 et. seq., is required for Project activities affecting lakes or streams and associated riparian habitat. Notification is required for any activity that will substantially divert or obstruct the natural flow; change or use material from the bed, channel, or bank including associated riparian or wetland habitat; or deposit or dispose of material where it may pass into a river, lake or stream. Work within ephemeral streams, washes, watercourses with a subsurface flow, and floodplains are subject to notification requirements. CDFW may not execute the final LSA Agreement until it has considered the final EIR and complied with its responsibilities as a Responsible Agency under CEQA.

### **Fully Protected Species**

Fully Protected species, including any listed in **Attachment 1**, may not be taken or possessed at any time except for collecting these species for necessary scientific research, relocation of the bird species for the protection of livestock, or if they are a covered species whose conservation and management is provided for in a Natural Community Conservation Plan (Fish & G. Code, §§ 3511, 4700, 5050, & 5515).

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City of Sausalito  
June 14, 2023  
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## **Marine Life Protection Act**

CDFW is responsible for marine biodiversity protection in coastal marine waters of California and ensuring fisheries are sustainably managed pursuant to Fish and Game Code section 2850 et seq.

## **PROJECT DESCRIPTION AND LOCATION**

The Project entails adoption of zoning changes, zoning overlays, and other actions needed to implement Program 4 of the Sausalito Housing Element, a portion of the City's General Plan that was updated in 2021. The Housing Element identifies how the City would accommodate the development of 908 total housing units based on needs identified in the City's 6th Cycle Regional Housing Needs Allocation. Of the 908 units, 647 units would be in opportunity sites subject to rezoning as identified in the Housing Element.

The Project consists of discontinuous parcels subject to these actions within the borders of the 2.1-square mile City of Sausalito, located in southern Marin County on the shores of Richardson Bay. The City is bound by San Francisco Bay (Richardson Bay) to the east, Golden Gate National Recreation Area to the west and south, and unincorporated Marin County, including the community of Marin City to the north and northwest.

The CEQA Guidelines (Cal. Code Regs., tit. 14, § 15000 et seq.) require that the EIR incorporate a full project description, including reasonably foreseeable future phases of the Project, that contains sufficient information to evaluate and review the Project's environmental impact (CEQA Guidelines, §§ 15124 & 15378). Please include a complete description of the following Project components in the Project description:

- Land use changes resulting from, for example, rezoning certain areas;
- Footprints of permanent Project features and temporarily impacted areas, such as staging areas and access routes;
- Area and plans for any proposed buildings/structures, ground disturbing activities, fencing, paving, stationary machinery, landscaping, and stormwater systems;
- Operational features of the Project, including level of anticipated human presence (describe seasonal or daily peaks in activity, if relevant), artificial lighting/light reflection, noise, traffic generation, and other features; and
- Construction schedule, activities, equipment, and crew sizes.

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### **Mixed Use Construction**

The NOP does not provide specific information on the type of mixed use that is proposed on opportunity sites 301 so it is assumed infrastructure constructed over the water will be proposed. It is also assumed that overwater construction may involve pile driving and/or dredging to make the structure accessible by land and/or water. Pile driving, specifically using an impact hammer, has been shown to create underwater sound levels that exceed the hydroacoustic thresholds set by the Hydroacoustic Fisheries Working Group (See **Attachment 2**) which could cause injury and/or mortality to fish. Additionally, dredging can cause impacts to aquatic habitats and species through direct removal, release of contaminated sediments, and indirect impacts through shading due to increased water turbidity. Depending on dredging methods, impacts may also include entrainment and/or impingement of fish or invertebrates.

CDFW recommends the draft EIR provide specific information on what type of mixed use will be proposed in opportunity sites 301 and how the mixed-use areas are being incorporated into an amendment to the Sausalito General Plan that is intended to analyze the goals, policies, and future actions to address existing and projected housing needs of the City. Please include specific information on the types of infrastructure that may be considered on opportunity sites 301 and the specific types of construction methods that may be used or considered.

### **ENVIRONMENTAL SETTING**

The EIR should provide sufficient information regarding the environmental setting (“baseline”) to understand the Project’s, and its alternative’s (if applicable), potentially significant impacts on the environment (CEQA Guidelines, §§ 15125 & 15360).

CDFW recommends that the CEQA document prepared for the Project provide baseline habitat assessments for special-status plant, fish and wildlife species located and potentially located within the Project area and surrounding lands, including but not limited to, all rare, threatened, or endangered species (CEQA Guidelines, § 15380). The EIR should describe aquatic habitats, such as wetlands or waters of the U.S. or State, and any sensitive natural communities or riparian habitat occurring on or adjacent to the Project site (for sensitive natural communities see:

<https://wildlife.ca.gov/Data/VegCAMP/NaturalCommunities#sensitive%20natural%20communities>), and any stream or wetland set back distances the City may require. Fully protected, threatened or endangered, candidate, and other special-status species that are known to occur, or have the potential to occur in or near the Project site, include but are not limited to, those listed in **Attachment 1**.

Habitat descriptions and the potential for species occurrence included in the EIR should include robust information from multiple sources: aerial imagery, historical and recent

Brandon Phipps  
City of Sausalito  
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survey data, field reconnaissance, scientific literature and reports, U.S. Fish and Wildlife Service's (USFWS) Information, Planning, and Consultation System, California Aquatic Resources Inventory, and findings from "positive occurrence" databases such as California Natural Diversity Database (CNDDDB). Only with sufficient data and information from the habitat assessment, can the City adequately assess which special-status species are likely to occur on or near the Project site, and whether they could be impacted by the Project.

CDFW recommends that prior to Project implementation, surveys be conducted for special-status species with potential to occur, following recommended survey protocols if available. Survey and monitoring protocols and guidelines are available at: <https://www.wildlife.ca.gov/Conservation/Survey-Protocol>.

Botanical surveys for special-status plant species, including those with a California Rare Plant Rank (<http://www.cnps.org/cnps/rareplants/inventory/>)<sup>1</sup>, must be conducted during the blooming period within the Project area and adjacent habitats that may be indirectly impacted by, for example, changes to hydrological conditions, and require the identification of reference populations. More than one year of surveys may be necessary based on environmental conditions. Please refer to CDFW protocols for surveying and evaluating impacts to special status plants available at: <https://www.wildlife.ca.gov/Conservation/Plants>.

## **Marine Biological Significance**

The San Francisco Bay-Delta is the second largest estuary in the United States and supports numerous aquatic habitats and biological communities. It encompasses 479 square miles, including shallow mudflats. This ecologically significant ecosystem supports both state and federally threatened and endangered species and sustains important commercial and recreational fisheries.

## **Eelgrass**

Native eelgrass beds (*Zostera marina*) are an important part of the San Francisco Bay ecosystem and are recognized by state and federal statutes as both highly valuable and sensitive habitats. Eelgrass provides primary production and nutrients to the ecosystem along with spawning, foraging, and nursery habitat for fish and other species. Pursuant to the federal Magnuson-Stevens Fishery Conservation and Management Act, eelgrass is designated as Essential Fish Habitat for various federally managed fish species within the Pacific Coast Groundfish and Pacific Coast Salmon Fisheries Management Plans

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<sup>1</sup> California Rare Plant Rank (CRPR) 1B plants are considered rare, threatened, or endangered in California and elsewhere. Further information on CRPR ranks is available in CDFW's *Special Vascular Plants, Bryophytes, and Lichens List* (<https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=109383&inline>) and on the California Native Plant Society website (<https://www.cnps.org/rare-plants/cnps-rare-plant-ranks>).



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(FMP). Eelgrass is also considered a habitat area of particular concern for various species within the Pacific Coast Groundfish FMP. Eelgrass habitats are further protected under state and federal “no-net-loss” policies for wetland habitats and are also listed by CDFW as a Sensitive Natural Community with a vulnerable listing status (State Rank S3). Additionally, the importance of eelgrass protection and restoration, as well as, the ecological benefits of eelgrass, is identified in the California Public Resources Code (Pub. Resource Code, § 35630).

The NOP shows opportunity sites 301 as potential mixed use. These opportunity sites in Richardson Bay contain multiple acres of eelgrass habitat that provide spawning habitat for Pacific herring and rearing habitat for Dungeness crab. Any overwater construction or dredging within these opportunity sites will impact eelgrass habitat.

### **IMPACT ANALYSIS AND MITIGATION MEASURES**

The EIR should discuss all direct and indirect impacts (temporary and permanent) that may occur with implementation of the Project (CEQA Guidelines, § 15126.2). This includes evaluating and describing impacts such as:

- Land use changes that would reduce open space or agricultural land uses and increase residential or other land use involving increased development;
- Encroachments into riparian habitats, wetlands or other sensitive areas;
- Potential for impacts to special-status species;
- Loss or modification of breeding, nesting, dispersal and foraging habitat, including vegetation removal, alternation of soils and hydrology, and removal of habitat structural features (e.g., snags, roosts, vegetation overhanging banks);
- Permanent and temporary habitat disturbances associated with ground disturbance, noise, lighting, reflection, air pollution, traffic or human presence; and
- Obstruction of movement corridors, fish passage, or access to water sources and other core habitat features.

The EIR should also identify existing and reasonably foreseeable future projects in the Project vicinity, disclose any cumulative impacts associated with these projects, determine the significance of each cumulative impact, and assess the significance of the Project’s contribution to each impact (CEQA Guidelines, §15355). Although a project’s impacts may be insignificant individually, its contributions to a cumulative impact may be considerable; a contribution to a significant cumulative impact – e.g.,

Brandon Phipps  
City of Sausalito  
June 14, 2023  
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reduction of available habitat for a special-status species – should be considered cumulatively considerable without mitigation to minimize or avoid the impact.

The CEQA Guidelines direct the City, as the Lead Agency, to consider and describe in the EIR all feasible mitigation measures to avoid and/or mitigate potentially significant impacts of the Project on the environment based on comprehensive analysis of the direct, indirect, and cumulative impacts of the Project (CEQA Guidelines, §§ 15021, 15063, 15071, 15126.2, 15126.4 & 15370). This should include a discussion of impact avoidance and minimization measures for special-status species, which are recommended to be developed in early consultation with CDFW, USFWS, and the National Marine Fisheries Service. These measures can then be incorporated as enforceable Project conditions to reduce potential impacts to biological resources to less-than-significant levels.

The draft EIR should include mitigation measures to avoid potential impacts to aquatic species for construction methods such as pile driving and dredging, including the following measures:

- In-water construction shall only occur during the CDFW approved work window of June 1 through November 30. Additional work window restrictions may apply for;
- A vibratory pile driver shall be used to the maximum extent possible;
- An impact hammer shall only be used if necessary and should include sound attenuation devices such as a wood cushion block and/or bubble curtain; and
- If an impact hammer is to be considered for construction, the City shall consult with CDFW regarding a CESA ITP for potential impacts to state listed species such as longfin smelt and Chinook salmon.

The draft EIR should include measures that will avoid and minimize the potential impacts to eelgrass habitat identified in opportunity sites 301. If avoidance and minimize measures will not fully prevent impacts to eelgrass, the draft EIR should include measures to mitigate potential impacts to eelgrass habitat.

## **ENVIRONMENTAL DATA**

CEQA requires that information developed in EIRs and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations (Pub. Resources Code, § 21003, subd. (e)). Accordingly, please report any special-status species and natural communities detected during Project surveys to CNDDDB. The CNDDDB online field survey form and other methods for submitting data can be found at the following link:

Brandon Phipps  
City of Sausalito  
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<https://wildlife.ca.gov/Data/CNDDDB/Submitting-Data>. The types of information reported to CNDDDB can be found at the following link:  
<https://wildlife.ca.gov/Data/CNDDDB/Plantsand-Animals>.

## FILING FEES

CDFW anticipates that the proposed Project will have an impact on fish and/or wildlife, and assessment of filing fees is necessary to defray the costs of CDFW's review under CEQA (Fish & G. Code, § 711.4; Pub. Resources Code, § 21089). Fees are payable upon filing of the Notice of Determination by the Lead Agency.

If you have any questions, please contact Alexander Single, Environmental Scientist, at (707) 980-5154 or by email at [Alexander.Single@wildlife.ca.gov](mailto:Alexander.Single@wildlife.ca.gov); or Melanie Day, Senior Environmental Scientist (Supervisory), at (707) 210-4415 or by email at [Melanie.Day@wildlife.ca.gov](mailto:Melanie.Day@wildlife.ca.gov).

Sincerely,

DocuSigned by:  
  
Erin Chappell  
Regional Manager  
Bay Delta Region

Attachment 1: Special-Status Species and Commercially/Recreationally Important Species

Attachment 2: Agreement in Principle for Interim Criteria for Injury to Fish from Pile Driving Activities

cc: Office of Planning and Research, State Clearinghouse (SCH No. 2023050516)  
Becky Ota, CDFW Marine Region – [Becky.Ota@wildlife.ca.gov](mailto:Becky.Ota@wildlife.ca.gov)  
Eric Wilkins, CDFW Marine Region – [Eric.Wilkins@wildlife.ca.gov](mailto:Eric.Wilkins@wildlife.ca.gov)  
Arn Aarreberg, CDFW Marine Region – [Arn.Aarreberg@wildlife.ca.gov](mailto:Arn.Aarreberg@wildlife.ca.gov)

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 City of Sausalito  
 June 14, 2023  
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### Attachment 1:

#### Special-Status Species and Commercially/Recreationally Important Species

Species Name	Common Name	Status
<i>Oncorhynchus kisutch</i>	Coho salmon - Central California Coast Evolutionarily Significant Unit (ESU)	FE, SE
<i>Oncorhynchus tshawytscha</i>	Chinook salmon - Sacramento River Winter-run ESU	FE, SE
<i>Oncorhynchus tshawytscha</i>	Chinook salmon - Central Valley Spring-run ESU	FT, ST
<i>Oncorhynchus mykiss</i>	steelhead – Central California Coast ESU	FT
<i>Oncorhynchus mykiss</i>	steelhead – Central Valley ESU	FT
<i>Riparia riparia</i>	bank swallow	ST
<i>Spirinchus thaleichthys</i>	longfin smelt	FC, ST
<i>Rana draytonii</i>	California red-legged frog	FT, SSC
<i>Eucyclogobius newberryi</i>	tidewater goby	FE
<i>Acipenser medirostris</i>	green sturgeon - southern Distinct Population Segment (DPS)	FT
<i>Enhydra lutris nereis</i>	southern sea otter	FP, FT
<i>Pelecanus occidentalis californicus</i>	brown pelican	FP
<i>Danaus plexippus plexippus</i>	monarch - California overwintering population	FC
<i>Acipenser transmontanus</i>	white sturgeon	SSC
<i>Dicamptodon ensatus</i>	California giant salamander	SSC
<i>Rana boylei</i>	foothill yellow-legged frog - north coast DPS	SSC
<i>Taxidea taxus</i>	American badger	SSC
<i>Corynorhinus townsendii</i>	Townsend's big-eared bat	SSC
<i>Emys marmorata</i>	western pond turtle	SSC

Brandon Phipps  
City of Sausalito  
June 14, 2023  
Page 10

<b><i>Cancer magister</i></b>	Dungeness crab	Fisheries
<b><i>Clupea pallasii</i></b>	Pacific herring	Fisheries
<b><i>Embiotocidae sp.</i></b>	surfperches	Fisheries
<b><i>Paralichthys californicus</i></b>	California halibut	Fisheries
<b><i>Sebastes sp.</i></b>	rockfish	Fisheries
<b><i>Arenaria paludicola</i></b>	marsh sandwort	FE, SE, CRPR 1B.1
<b><i>Holocarpha macradenia</i></b>	Santa Cruz tarplant	FT, SE, CRPR 1B.1
<b><i>Hesperolinon congestum</i></b>	Marin western flax	FT, ST, CRPR 1B.1
<b><i>Gilia capitata ssp. chamissonis</i></b>	blue coast gilia	CRPR 1B.1
<b><i>Horkelia cuneata var. sericea</i></b>	Kellogg's horkelia	CRPR 1B.1
<b><i>Leptosiphon rosaceus</i></b>	rose leptosiphon	CRPR 1B.1
<b><i>Fritillaria lanceolata var. tristulis</i></b>	Marin checker lily	CRPR 1B.1
<b><i>Triquetrella californica</i></b>	coastal triquetrella	CRPR 1B.2
<b><i>Fissidens pauperculus</i></b>	minute pocket moss	CRPR 1B.2
<b><i>Plagiobothrys chorisianus var. chorisianus</i></b>	Choris' popcornflower	CRPR 1B.2
<b><i>Calystegia purpurata ssp. saxicola</i></b>	coastal bluff morning-glory	CRPR 1B.2
<b><i>Hemizonia congesta ssp. congesta</i></b>	congested-headed hayfield tarplant	CRPR 1B.2
<b><i>Gilia millefoliata</i></b>	dark-eyed gilia	CRPR 1B.2
<b><i>Helianthella castanea</i></b>	Diablo helianthella	CRPR 1B.2
<b><i>Cirsium andrewsii</i></b>	Franciscan thistle	CRPR 1B.2
<b><i>Arctostaphylos virgata</i></b>	Marin manzanita	CRPR 1B.2
<b><i>Microseris paludosa</i></b>	marsh microseris	CRPR 1B.2

Brandon Phipps  
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<b><i>Amorpha californica</i> var. <i>napensis</i></b>	Napa false indigo	CRPR 1B.2
<b><i>Horkelia marinensis</i></b>	Point Reyes horkelia	CRPR 1B.2
<b><i>Chloropyron maritimum</i> ssp. <i>palustre</i></b>	Point Reyes salty bird's-beak	CRPR 1B.2
<b><i>Chorizanthe cuspidata</i> var. <i>cuspidata</i></b>	San Francisco Bay spineflower	CRPR 1B.2
<b><i>Collinsia multicolor</i></b>	San Francisco collinsia	CRPR 1B.2
<b><i>Stebbinsoseris decipiens</i></b>	Santa Cruz microseris	CRPR 1B.2
<b><i>Horkelia tenuiloba</i></b>	thin-lobed horkelia	CRPR 1B.2
<b><i>Eriogonum luteolum</i> var. <i>caninum</i></b>	Tiburon buckwheat	CRPR 1B.2
<b><i>Arctostaphylos montana</i> ssp. <i>montana</i></b>	Mt. Tamalpais manzanita	CRPR 1B.3
<b><i>Quercus parvula</i> var. <i>tamalpaisensis</i></b>	Tamalpais oak	CRPR 1B.3
<b><i>Hypogymnia schizidiata</i></b>	island tube lichen	CRPR 1B.3
<b><i>Calamagrostis crassiglumis</i></b>	Thurber's reed grass	CRPR 2B.1
<b><i>Polemonium carneum</i></b>	Oregon polemonium	CRPR 2B.2
<b><i>Silene scouleri</i> ssp. <i>scouleri</i></b>	Scouler's catchfly	CRPR 2B.2
<b><i>Carex praticola</i></b>	northern meadow sedge	CRPR 2B.2
<b><i>Heteranthera dubia</i></b>	water star-grass	CRPR 2B.2
<b><i>Kopsiopsis hookeri</i></b>	small groundcone	CRPR 2B.3
<b><i>Polygonum marinense</i></b>	Marin knotweed	CRPR 3.1
<b><i>Zostera marina</i></b>	eelgrass	Fisheries

FE = federally listed as endangered under the Endangered Species Act (ESA); FT = federally listed as threatened under ESA; FC = federal candidate for listing under ESA; FP = state fully protected under Fish and Game Code; SE = state listed as endangered under CESA; ST = state listed as threatened under CESA; SSC = state Species of Special Concern; CRPR = California Rare Plant Rank; Fisheries = species with important commercial and recreational fisheries value as well as ecological value that could potentially be impacted by Project activities

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*NOAA's Fisheries Northwest and Southwest Regions*    *U.S. Fish and Wildlife Service Regions 1 & 8*    *California/Washington/Oregon Departments of Transportation*    *California Department of Fish and Game*    *U.S. Federal Highway Administration*

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MEMORANDUM

June 12, 2008

From: Fisheries Hydroacoustic Working Group

Subject: Agreement in Principle for Interim Criteria for Injury to Fish from Pile Driving Activities

To: Applicable Agency Staff

The signatory agencies, identified below, have agreed in principle to use the attached Interim Criteria for Injury to Fish from Pile Driving Activities. The agreement was concluded at a meeting in Vancouver, Washington on June 10-11, 2008 with key technical and policy staff from the Federal Highway Administration, NOAA Fisheries, U.S. Fish and Wildlife Service, the Departments of Transportation from California, Oregon, and Washington; and national experts on sound propagation activities that affect fish and wildlife species of concern. The agreed upon criteria identify sound pressure levels of 206 dB peak and 187 dB accumulated sound exposure level(SEL) for all listed fish except those that are less than 2 grams. In that case, the criteria for the accumulated SEL will be 183 dB.

These criteria will apply to all new projects beginning no later than 60 days from the date of this memorandum. During the interim 60 day period, the Transportation Agencies will work with the Services to identify projects currently in the consultation process and reach agreement on which criteria will be used to assess project effects.

The agencies agree to review the science periodically and revise the threshold and cumulative levels as needed to reflect current information. Behavioral impacts to fish and impacts to marine mammals are not addressed in this agreement. Sub-injurious effects will continue to be discussed in future meetings.

The respective agencies also agree to develop appropriate training for staff on these revised criteria, as well as a process to review and possibly refine the criteria, when appropriate.

For questions or concerns about the revised criteria, we recommend staff contact their agency environmental coordinator or agency expert on pile driving issues.

*Carol G. Adkins*



Federal Highway Administration\*

\*FHWA supports the use of these interim criteria in the states signing this agreement in principle. FHWA leaves the schedule for implementation to the discretion of the state DOTs in cooperation with their respective FHWA Division Offices and the Services.

*Michael Jehan*



NOAA Fisheries – NWR

*Russell M. Strock*



NOAA Fisheries – SWR

*Ken S. Berg*



US Fish and Wildlife Service Region 1

*Michael E. Payer*



US Fish and Wildlife Service Region 8

*[Signature]*



California Department of Transportation

*[Signature]*



California Department of Fish and Game

*A. G. [Signature]*

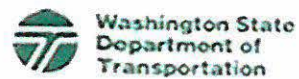


Oregon Department of Transportation



*Megan L. Latta*

Washington State Department of Transportation



**FHWG Agreement in Principle**  
**Technical/Policy Meeting Vancouver, WA**  
***June, 11 2008***

<b>Interim Criteria for Injury</b>	<b>Agreement in Principle</b>
Peak	206 dB (for all size of fish)
Cumulative SEL	187 dB - for fish size of two grams or greater.  183 dB - for fish size of less than two grams.*

*\*see Table—to be developed*



Christina Erwin &lt;cerwin@denovoplanning.com&gt;

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**FW: Comments on the Notice of Preparation and Scoping Meeting for the Draft Environmental Impact Report for City of Sausalito 6th Cycle Housing Element Programs**

1 message

**Rudin, Sergio A.** <SRudin@bwslaw.com>

Wed, Jun 21, 2023 at 9:37 AM

To: Brandon Phipps &lt;bhipps@sausalito.gov&gt;, Beth Thompson &lt;bthompson@denovoplanning.com&gt;, Christina Erwin &lt;cerwin@denovoplanning.com&gt;

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**From:** Mark Coleman <info@markcoleman.org>**Sent:** Wednesday, June 21, 2023 7:16 AM**To:** [Citycouncil@sausalito.gov](mailto:Citycouncil@sausalito.gov); [czapata@sausalito.gov](mailto:czapata@sausalito.gov)**Subject:** Comments on the Notice of Preparation and Scoping Meeting for the Draft Environmental Impact Report for City of Sausalito 6th Cycle Housing Element Programs**[EXTERNAL]**

---

Dear Mr. Zapata and Members of the City Council

I am writing in response to the City of Sausalito Scoping Meeting Housing Element Statement letter in which it was stated that comments were being gathered on the proposed plan.

As a resident of Sausalito who deeply loves this community and land, I am very concerned about the current housing plan. I understand it is an extremely difficult to try to squeeze construction into a geographical location that is bound by water, hills, a freeway and open space. However, the environmental and social impact of building high density housing in a town where the infrastructure has not been built to accommodate increased traffic, water use and parking feels untenable.

Specifically and on a personal note, I am a homeowner on Girard Avenue, directly behind parcel #53. Seeing that it is zoned for up to 49 units (if I'm understanding the site map correctly) is highly disturbing. My home is my primary asset. And if construction of a building large enough to accommodate more than 2-3 stories goes up in front of us, our home and it's aesthetic and financial value will be significantly impacted.

In addition, parcel #53 is a tiny lot, on a significant slope, through which a stream runs almost year round. Is this really a good site for any housing whatsoever. In normal

circumstances I doubt a private homeowner would even be granted a building permit for any home construction here, never mind for a multiple occupancy building.

Further, Girard is a curved street with a blind corner which already means we have accidents. Increasing the amount of traffic on our street increases the risk to walkers, children, cars and pets.

Also from what I understand, there is the possibility of building some of the proposed units around Dunphy Park area which could potentially disrupt the incredible value that cherished park offers to all local Sausalito residents as well as the concern that it may be being built on land that is in what is previously been designated as severe earthquake liquefaction zone

I implore you to reconsider the viability of building 49 units on parcel #53 as well as the plan to build so many units around the city hall area that is already high density enough.

Sincerely

Mark Coleman

I'm using [Inbox When Ready](#) to protect my focus.



Christina Erwin &lt;cerwin@denovoplanning.com&gt;

**FW: Urgent Concern: Housing Element/Dire Earthquake Hazard**

1 message

**Rudin, Sergio A.** <SRudin@bwslaw.com>

Wed, Jun 21, 2023 at 2:31 PM

To: "bphipp@sausalito.gov" &lt;bphipp@sausalito.gov&gt;, Beth Thompson &lt;bthompson@denovoplanning.com&gt;, Christina Erwin &lt;cerwin@denovoplanning.com&gt;

**From:** neslihan doran <nesli@alum.mit.edu>**Sent:** Wednesday, June 21, 2023 2:25 PM**To:** citycouncil@sausalito.gov**Cc:** czapata@sausalito.gov**Subject:** Urgent Concern: Housing Element/Dire Earthquake Hazard**EXTERNAL**with corrected address

Hello,

We would like to request that the city **review** its proposed housing plan to ensure that all residents have a safe living situation and that our small streets and limited exit roads can, in case of an emergency, **support the safe evacuation and care of all residents**. Specifically, we ask that site #301 be reevaluated and that no housing extend overwater or be placed in a liquefaction zone. Everyone deserves a safe place to live, no matter their income level.

Given Sausalito's limited size and topography, it seems reasonable to challenge the mandate if needed so that the amount of housing required is at a safe level for the resources available.

Sincerely,

Neslihan Doran-Civan

269 Santa Rosa Ave.

On Wed, Jun 21, 2023 at 2:23 PM neslihan doran &lt;nesli@alum.mit.edu&gt; wrote:

Hello,

We would like to request that the city **review** its proposed housing plan to ensure that all residents have a safe living situation and that our small streets and limited exit roads can, in case of an emergency, **support the safe evacuation and care of all residents**. Specifically, we ask that site #301 be reevaluated and that no housing extend overwater or be placed in a liquefaction zone. Everyone deserves a safe place to live, no matter their income level.

Given Sausalito's limited size and topography, it seems reasonable to challenge the mandate if needed so that the amount of housing required is at a safe level for the resources available.

Sincerely,

Neslihan Doran-Civan

269 Sausalito Ave.

On Wed, Jun 21, 2023 at 11:26 AM Katherine Doran <katherine\_doran@hotmail.com> wrote:

Hello,

We would like to request that the city **review** its proposed housing plan to ensure that all residents have a safe living situation and that our small streets and limited exit roads can, in case of an emergency, **support the safe evacuation and care of all residents**. Specifically, we ask that site #301 be reevaluated and that no housing extend overwater or be placed in a liquefaction zone. Everyone deserves a safe place to live, no matter their income level.

Given Sausalito's limited size and topography, it seems reasonable to challenge the mandate if needed so that the amount of housing required is at a safe level for the resources available.

Sincerely,

Katherine Doran

39 Wray

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**From:** Sue Stephenson <copywritersue@gmail.com>  
**Date:** June 20, 2023 at 2:35:38 PM PDT  
**To:** [citycouncil@sausalito.gov](mailto:citycouncil@sausalito.gov), [czapata@sausalito.gov](mailto:czapata@sausalito.gov)  
**Subject:** Urgent Concern: Housing Element/Dire Earthquake Hazard

Dear Mr. Zapata and Members of the City Council,

While I understand it's been nothing short of gargantuan to get a housing element plan in place, certain aspects of the current one *cannot be permitted* to come to fruition.

My focus here is on the safety of current and future residents. I refer specifically to site #301 and adjacent areas.

**Apart from the fact that adding density along our only thoroughfare is an irrefutable danger to our residents, who will not be able to quickly evacuate in the event of any emergency, there is another grave problem: the build falls in a severe earthquake liquefaction zone.**

**The Book Club Favorite that Ignites Discussion**  
**A Mystery Set in Sausalito, SF, and on the Sausalito Ferry**  
*Click here to learn more!*

Sausalito Earthquake Safety and Liquefaction  
Map

[oursausalito.com](https://oursausalito.com)

Putting low-income (or any income) housing in a highly dangerous environment—whether that be toxic, shoddily built or geologically treacherous—not only sets the stage for catastrophic loss of life; it also exposes our little city to all manner of legal action, tragic for all. A small scale Hurricane Katrina situation in the making.

Furthermore, we cannot be so zealous in our need to “hit the numbers” that we fail to consider impacts like these.

Personally, I am incredulous that our town did not join the statewide lawsuit challenging the mandate. We are a perfect example of place that, politically-speaking, welcomes all...but our land features, available acreage, and emergency accessibility FULLY NECESSITATES a modification to the number of units earmarked for the area and their placement.

And what I've cited here is a very good example of why.

I implore you to work to alter the plan and its scope, in whatever way possible.

Sincerely yours,

Sue Stephenson

403 Bonita

Sent from my iPad

--

Neslihan

--

Neslihan

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Neslihan

**From:** [Virginia Erwin](#)  
**To:** [Brandon Phipps](#)  
**Subject:** Housing Element Prioritized Transportation Infrastructure  
**Date:** Thursday, June 8, 2023 8:46:35 PM

---

Dear Mr. Phipps,

I hope this note finds you well.

I am excited for the "new" housing, and I believe the city needs more multi-unit properties for rent and perhaps co-op purchasing for senior housing.

I do want to stress the importance of having our transportation infrastructure set up before we build. Public safety and mobility are crucial in our small yet busy community.

Sidewalks and bike lanes need to be completed, so people can access active modes of transportation.

Especially on the Alexander Ave corridor to the city of San Francisco. New zoning in that corridor needs to be put into place as soon as possible. I think having NO street parking from the southern corner of 2nd Ave to Alexander Ave which runs into the intersection of East Rd (which then goes to Discovery Center and Cavallo Point) is greatly needed as that corridor is one of the most dangerous in the state of California.

People living in Sausalito need access to that corridor to go work in San Francisco by means other than cars, and a few buses that go through Sausalito.

I am kindly requesting that we consider allocating resources, perhaps from the developers, and the state of California. Taking this approach will ensure that our community will thrive as a well-rounded, inclusive, and sustainable place to live.

Thank you again for your time and consideration.

I look forward to discussing this matter further and working together to create a vibrant and livable community for all.

Warm regards,

Ginny Erwin and Emmet Yeazell  
21 Miller Ave  
Sausalito, CA

--

Ginny Erwin MS,RDN,CHC,CES,CPT  
773-852-5486





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[www.MarinMEHC.org](http://www.MarinMEHC.org)  
[info@marinMEHC.org](mailto:info@marinMEHC.org)

June 21, 2023

Brandon Phipps, Community and Economic Development Director  
Community Development Department  
City of Sausalito  
420 Litho Street  
Sausalito, CA 94965  
[bhipps@sausalito.gov](mailto:bhipps@sausalito.gov)

**Subject: Notice of Preparation for Draft Environmental Impact Report - City of Sausalito 6<sup>th</sup> Cycle Housing Element Programs**

Dear Mr. Phipps:

Thank you for the opportunity to review and submit comments on the Notice of Preparation (NOP) to prepare a Draft Environmental Impact Report (DEIR) for the 6<sup>th</sup> Cycle Housing Element Programs. Marin Environmental Housing Collaborative (MEHC), a Marin-based housing advocacy organization, acknowledges that the implementation of the recently adopted Sausalito Housing Element is a critical next step in the development of needed housing for the Marin community. The programs to be implemented include, among others, the rezoning of the housing opportunity sites, which will allow for residential use and development, consistent with the adopted Housing Element.

MEHC promotes advocacy for environmentally sound, affordable housing development and renter protection. A comprehensive environmental review that follows the statutes and guidelines of the California Environmental Quality Act (CEQA) plays an important role in the success of future housing development. Based on a review of the NOP, MEHC respectfully submits the following comments and requests for the scoping of the DEIR, which focus on the rezoning of the housing opportunity sites:

1. MEHC recognizes that in 2021, as noted in the NOP, Sausalito adopted the City of Sausalito General Plan, which included the preparation and certification of an Environmental Impact Report (EIR). However, the 2021 General Plan forecasts, and the supportive EIR assesses, a growth projection of up to 304 new housing units. The subsequently adopted Housing Element proposed to more than double the planning for housing (724 units), which MEHC supports.

*Tax deductible donations made payable to MEHC will be administered by MarinLink, a 501(c)(3) nonprofit corporation that promotes and sponsors community-based projects.*

It is unclear if the recommendation of the NOP is to prepare a new and separate DEIR to assess the Housing Element programs or to "tier" from the 2021 General Plan EIR. Please clarify.

2. The NOP includes a comprehensive list of topic areas that will be addressed/studied in the DEIR. MEHC fully supports the topic areas to be studied but has the following comments regarding specific topic areas:
  - a. Regarding hydrology/water quality, there is mention of assessing the potential for flooding. While sea level rise is a topic area that is not currently covered under the CEQA Guidelines, the low-lying areas of Sausalito are vulnerable to increased flooding due to projected rising tides. Sausalito is diligently working on planning for and adapting to rising tides, so the DEIR should include a discussion of this topic. Of particular concern is that there are a handful of housing opportunity sites subject to rezoning that are submerged tidelands. These sites would be impacted by increased flooding and rising tides so site development will be extremely challenging. The environmental considerations for these sites need to be carefully studied and disclosed in the DEIR.
  - b. Regarding fire hazards, a number of the housing opportunity sites that are subject to rezoning are located on wooded and steep sites that are accessed by a narrow road system. In addition to emergency response and evacuation planning, individual site measures for fire prevention should be included as mitigation measures for future, individual housing site development.
  - c. Regarding transportation, MEHC assumes that the DEIR will include a detailed vehicle miles traveled (VMT) analysis, which is favorable to housing use near transit. MEHC recognizes that the CEQA Guidelines no longer permit the assessment of local intersection impacts through methods such as a level of service (LOS) analysis. However, does the City expect to complete a local intersection impact analysis that will consider the higher housing projections of the Housing Element?
3. It is unclear whether the DEIR is intended to be prepared as a "Program EIR" or will be prepared at a level of detail that assesses the environmental impacts of the individual housing sites that are subject to rezoning. There is no mention of this detail in the NOP. The adopted Housing Element Appendices D1 and D2 provide a list of all the housing opportunity sites. The inventory table includes known environmental conditions, resources, and constraints for each inventoried site, which is helpful information for the City decision makers and the public. Will this table be used as a guide to prepare a DEIR that is site-specific in its analysis? MEHC is particularly interested in this issue as the current State housing laws have relaxed environmental review for some housing development projects, in part with reliance on environmental studies conducted during the initial property zoning process. This issue is important for housing projects eligible for ministerial ("by-right") review under SB35 and SB9. Such projects are exempt from environmental/CEQA review and subject solely to compliance with adopted "objective standards."

Thank you for this opportunity to comment on this critical policy planning document.

Yours truly,

A handwritten signature in blue ink that reads "Paul A. Jensen". The signature is written in a cursive style with a light blue background highlight.

Paul A. Jensen, AICP  
Vice Chair



Christina Erwin &lt;cerwin@denovoplanning.com&gt;

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**FW: City of Sausalito Notice of Preparation Housing Element Programs Draft Environmental Impact Report**

1 message

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**Brandon Phipps** <bphipps@sausalito.gov>  
To: Christina Erwin <cerwin@denovoplanning.com>  
Cc: Beth Thompson <bthompson@denovoplanning.com>

Tue, Jun 13, 2023 at 2:16 PM

FYI – Public comment on the NOP.

**BRANDON PHIPPS****Community & Economic Development Director**

City of Sausalito | Community Development Department

[420 Litho Street, Sausalito, CA 94965](#)

Direct: (415) 289-4142 | Cell: (628) 288-9697 | Fax: (415) 289-4167

---

**From:** Babette McDougal <babette.mcdougal@icloud.com>  
**Sent:** Tuesday, June 13, 2023 1:31 PM  
**To:** Beth Thompson <bthompson@denovoplanning.com>  
**Cc:** Brandon Phipps <bphipps@sausalito.gov>; Chris Zapata <czapata@sausalito.gov>  
**Subject:** Re: City of Sausalito Notice of Preparation Housing Element Programs Draft Environmental Impact Report

Dear Ms Thompson,

Thank you for taking the initiative to reach out to yours truly, I appreciate both the notice and information.

My only concern regards the attachment. There's no draft of an environmental impact report; I only see a document stating an intent to possibly prepare an EIR, if deemed necessary.

Have I missed something?

I see the plot map .. which clearly 'screams' yes, do an EIR.

Your eloquently written document certainly describes the geographic (and geologic) confinements already in play, and attendant elevated risk of fire due to our already densely populated terrain that's surrounded by national forests and designated open spaces.

Indeed, I'm in possession of a 2003 EIR for Sausalito Marine, and their then-proposed build-out and expansion to nearly 300 new births plus four office buildings and parking. The project was defeated by the Friends of Dunphy Park, of which I was a part.

Dunphy Park is where the town gathers to acknowledge important milestone moments affecting our community. Dunphy Park hosts many important gatherings and town events, all of which enliven every square inch of this entire park.

It's the site of the annual Indian Summer Chilli Cook-off festival. No one is likely to forget the decision to proceed with the Chilli Cook-off in the immediate aftermath of the 9/11 attacks on America.

Along with many others, I let the excuse of chopping lots of onions, peppers and garlic serve as a convenient excuse to let the tears flow. That's how everyone felt that day.

All the while 'Old Glory' flew at half staff.

But everyone showed up too, and the chilli competition was fierce!

Community regulars like the Bay Cities Refuse guys, gals & kids who always cook-up delicious recipes, pitted against several community organizations cooking up local favorites, along with local celebrity chefs presenting gourmet chilli dishes.

A somber but glorious day for all of us blessed with this American Dream. A strong empowered community assures a secure future.

Question:

What happened to the negotiated settlement by the City between Sausalito Marine and the Friends of Dunphy Park?

The FDP contingent raised substantial seed capital, endowed by the late Charlie Merrill (his own monetary contribution was several hundred-thousand dollars); others also contributed.

FDP mobilization of local citizens was accelerated when the now late esteemed neighbor Chuck Donald boldly stepped down from the planning commission (or was it city council?) to join with FDP. Then, most everyone stepped up to support protecting and even expanding the park, a winning proposition.

With support from Trust for Public Lands, Save the Bay and many others, FDP's work resulted in agreement for the City to purchase and implement designated permanent conservation easements for the then existing open water tracts, ditto for the contiguous shoreline, and railroad right-of-ways. Jacques Ullman was elected FDP chairman, and was instrumental in seeing the project through. The master plan is available online.

Now it appears the latest owner of Sausalito Marine wants to undue history and use the affordable housing excuse to expand his marina (here we go again??).

Perhaps you saw the Sacramento Bee's front page headlines (yesterday, Monday) on the failure of the metro-region's attempt to address affordable housing, despite their aggressive hyper-development in support of this "housing element" drill. Fully one-third of residents in the Metro-Sacramento region still cannot afford housing.

ABAG needs to pay attention; better still they should be called out for their inherent conflicts of interest in even managing this exercise. The same might also be said of certain Sausalito City Council members.

But my main concern is the lack of an EIR draft. Does a draft document exist? If so, where may I find it?

I look forward to hearing from you.

Many thanks.

Best wishes,

Babette McDougal

+1.415.867.8411/mobile

Sent from my iPhone

On May 22, 2023, at 14:08, Beth Thompson <[bthompson@denovoplanning.com](mailto:bthompson@denovoplanning.com)> wrote:

Good afternoon,

This email is sent on behalf of the City of Sausalito to notify you of the public comment period for the Notice of Preparation (NOP) for the City of Sausalito Housing Element Programs Draft Environmental Impact Report.

Please see the attached NOP for information regarding the scope of the EIR, how to comment, where comments should be sent, and the comment period, which ends June 21, 2023.

For additional information, please contact Brandon Phipps, City of Sausalito Community & Economic Development Director at [bphipps@sausalito.gov](mailto:bphipps@sausalito.gov).

Thank you,

Beth Thompson

**Beth Thompson** | Principal

De Novo Planning Group | [www.denovoplanning.com](http://www.denovoplanning.com)

**Northern California** | 1020 Suncoast Lane #106 | El Dorado Hills, CA 95762

**Southern California** | 180 East Main Street #108 | Tustin, CA 92780

<Sausalito\_HousingPrograms\_NOP\_Long.pdf>

---



**image001.jpg**  
12K



Christina Erwin <cerwin@denovoplanning.com>

**FW: Does draft EIR exist?**

1 message

**Brandon Phipps** <bphipps@sausalito.gov> Mon, Jun 26, 2023 at 1:27 PM  
To: Sergio Rudin <SRudin@bwslaw.com>, Beth Thompson <bthompson@denovoplanning.com>, Christina Erwin <cerwin@denovoplanning.com>

Beth and Team,

Additional comments in connection with the Sausalito HE / EIR / NOP.

Kind regards,

Brandon

**BRANDON PHIPPS**  
Community & Economic Development Director  
City of Sausalito | Community Development Department  
420 Litho Street, Sausalito, CA 94965  
Direct: (415) 289-4142 | Cell: (628) 288-9697 | Fax: (415) 289-4167

-----Original Message-----  
From: Babette McDougal <babette.mcdougal@icloud.com>  
Sent: Thursday, June 22, 2023 6:59 PM  
To: Brandon Phipps <bphipps@sausalito.gov>  
Subject: Re: Does draft EIR exist?

Brandon, thanks very much for clarifying.

BTW: one item I considered adding to my letter and the discussion of Dunphy Park: this area has been visited over the years by the Coastal Miwok tribes people, as what we now call Dunphy Park is, in fact an identified Miwok burial site .. yikes! Rather delicate; yes?! Just wondering if there's new news on this front.

All best,

Babette.

> On Jun 22, 2023, at 5:14 PM, Brandon Phipps <bphipps@sausalito.gov> wrote:  
>  
> Babette,  
>  
> Good evening. The Draft Housing Element EIR is currently in-progress. We do not have a draft to share at this time.  
>  
> Kind regards,  
>  
> Brandon  
>  
> **BRANDON PHIPPS**  
> Community & Economic Development Director City of Sausalito |  
> Community Development Department  
> 420 Litho Street, Sausalito, CA 94965  
> Direct: (415) 289-4142 | Cell: (628) 288-9697 | Fax: (415) 289-4167  
>  
> -----Original Message-----  
> From: Babette McDougal <babette.mcdougal@icloud.com>  
> Sent: Thursday, June 22, 2023 5:12 PM  
> To: Brandon Phipps <bphipps@sausalito.gov>  
> Subject: Does draft EIR exist?  
>



> Hello Brandon,  
>  
> I'm still confused by the wording in the city statements — would you kindly clarify if indeed an initial draft of the Housing Element EIR already does exist?  
>  
> If yes, would you kindly direct me to a copy of this document?  
>  
> Many thanks,  
>  
> Babette McDougal  
> +1.415.867.8411/mobile  
> Sent from my iPhone

Babette McDougal  
[babette.mcdougal@icloud.com](mailto:babette.mcdougal@icloud.com)  
+1.415.867.8411/mobile

# NATIVE AMERICAN HERITAGE COMMISSION

May 25, 2023

Governor's Office of Planning & Research

**MAY 31 2023**

Brandon Phipps  
City of Sausalito  
420 Litho St.  
Sausalito, CA 94965

## STATE CLEARINGHOUSE

**Re: 2023050516, City of Sausalito 6th Cycle Housing Element Programs, Marin County**

Dear Mr. Phipps:

The Native American Heritage Commission (NAHC) has received the Notice of Preparation (NOP), Draft Environmental Impact Report (DEIR) or Early Consultation for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code §21000 et seq.), specifically Public Resources Code §21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource, is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit.14, § 15064.5 (b) (CEQA Guidelines §15064.5 (b))). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an Environmental Impact Report (EIR) shall be prepared. (Pub. Resources Code §21080 (d); Cal. Code Regs., tit. 14, § 5064 subd.(a)(1) (CEQA Guidelines § 15064 (a)(1))). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources within the area of potential effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, "tribal cultural resources" (Pub. Resources Code §21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. (Pub. Resources Code §21084.2). Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code §21084.3 (a)). **AB 52 applies to any project for which a notice of preparation, a notice of negative declaration, or a mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements.** If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. §800 et seq.) may also apply.

The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments.

**Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.**

AB 52



ACTING CHAIRPERSON  
**Reginald Pagaling**  
Chumash

SECRETARY  
**Sara Dutschke**  
Miwok

COMMISSIONER  
**Isaac Bojorquez**  
Ohlone-Costanoan

COMMISSIONER  
**Buffy McQuillen**  
Yokayo Pomo, Yuki,  
Nomlaki

COMMISSIONER  
**Wayne Nelson**  
Luiseño

COMMISSIONER  
**Stanley Rodriguez**  
Kumeyaay

COMMISSIONER  
**Vacant**

COMMISSIONER  
**Vacant**

COMMISSIONER  
**Vacant**

EXECUTIVE SECRETARY  
**Raymond C. Hitchcock**  
Miwok, Nisenan

**NAHC HEADQUARTERS**  
1550 Harbor Boulevard  
Suite 100  
West Sacramento,  
California 95691  
(916) 373-3710  
[nahc@nahc.ca.gov](mailto:nahc@nahc.ca.gov)  
[NAHC.ca.gov](http://NAHC.ca.gov)

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

**1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project:**

Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:

- a. A brief description of the project.
- b. The lead agency contact information.
- c. Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code §21080.3.1 (d)).
- d. A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code §21073).

**2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report:** A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code §21080.3.1, subs. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or Environmental Impact Report. (Pub. Resources Code §21080.3.1 (b)).

- a. For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code §65352.4 (SB 18). (Pub. Resources Code §21080.3.1 (b)).

**3. Mandatory Topics of Consultation If Requested by a Tribe:** The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:

- a. Alternatives to the project.
- b. Recommended mitigation measures.
- c. Significant effects. (Pub. Resources Code §21080.3.2 (a)).

**4. Discretionary Topics of Consultation:** The following topics are discretionary topics of consultation:

- a. Type of environmental review necessary.
- b. Significance of the tribal cultural resources.
- c. Significance of the project's impacts on tribal cultural resources.
- d. If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code §21080.3.2 (a)).

**5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process:** With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code §6254 (r) and §6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code §21082.3 (c)(1)).

**6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document:** If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:

- a. Whether the proposed project has a significant impact on an identified tribal cultural resource.
- b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code §21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code §21082.3 (b)).

- 7. Conclusion of Consultation:** Consultation with a tribe shall be considered concluded when either of the following occurs:
- a.** The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
  - b.** A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code §21080.3.2 (b)).
- 8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document:** Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code §21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code §21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code §21082.3 (a)).
- 9. Required Consideration of Feasible Mitigation:** If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code §21084.3 (b). (Pub. Resources Code §21082.3 (e)).
- 10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:**
- a.** Avoidance and preservation of the resources in place, including, but not limited to:
    - i.** Planning and construction to avoid the resources and protect the cultural and natural context.
    - ii.** Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
  - b.** Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
    - i.** Protecting the cultural character and integrity of the resource.
    - ii.** Protecting the traditional use of the resource.
    - iii.** Protecting the confidentiality of the resource.
  - c.** Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
  - d.** Protecting the resource. (Pub. Resource Code §21084.3 (b)).
  - e.** Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code §815.3 (c)).
  - f.** Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code §5097.991).
- 11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource:** An Environmental Impact Report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:
- a.** The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code §21080.3.1 and §21080.3.2 and concluded pursuant to Public Resources Code §21080.3.2.
  - b.** The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
  - c.** The lead agency provided notice of the project to the tribe in compliance with Public Resources Code §21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code §21082.3 (d)).

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: [http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation\\_CalEPAPDF.pdf](http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf)

## SB 18

SB 18 applies to local governments and requires local governments to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code §65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: [https://www.opr.ca.gov/docs/09\\_14\\_05\\_Updated\\_Guidelines\\_922.pdf](https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf).

Some of SB 18's provisions include:

1. **Tribal Consultation**: If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code §65352.3 (a)(2)).
2. **No Statutory Time Limit on SB 18 Tribal Consultation**. There is no statutory time limit on SB 18 tribal consultation.
3. **Confidentiality**: Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code §65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code §5097.9 and §5097.993 that are within the city's or county's jurisdiction. (Gov. Code §65352.3 (b)).
4. **Conclusion of SB 18 Tribal Consultation**: Consultation should be concluded at the point in which:
  - a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
  - b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: <http://nahc.ca.gov/resources/forms/>.

### NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center ([https://ohp.parks.ca.gov/?page\\_id=30331](https://ohp.parks.ca.gov/?page_id=30331)) for an archaeological records search. The records search will determine:
  - a. If part or all of the APE has been previously surveyed for cultural resources.
  - b. If any known cultural resources have already been recorded on or adjacent to the APE.
  - c. If the probability is low, moderate, or high that cultural resources are located in the APE.
  - d. If a survey is required to determine whether previously unrecorded cultural resources are present.
2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
  - a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.
  - b. The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.

**3.** Contact the NAHC for:

- a.** A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
  - b.** A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.
- 4.** Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.
- a.** Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, § 15064.5(f) (CEQA Guidelines § 15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
  - b.** Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
  - c.** Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code § 7050.5, Public Resources Code § 5097.98, and Cal. Code Regs., tit. 14, § 15064.5, subdivisions (d) and (e) (CEQA Guidelines § 15064.5, subs. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

If you have any questions or need additional information, please contact me at my email address:  
[Cody.Campagne@nahc.ca.gov](mailto:Cody.Campagne@nahc.ca.gov)

Sincerely,

*Cody Campagne*

Cody Campagne  
Cultural Resources Analyst

cc: State Clearinghouse



Christina Erwin &lt;cerwin@denovoplanning.com&gt;

---

**FW: Comments on the Notice of Preparation and Scoping Meeting for the Draft Environmental Impact Report for City of Sausalito 6th Cycle Housing Element Programs**

1 message

**Rudin, Sergio A.** <SRudin@bwslaw.com>

Wed, Jun 21, 2023 at 9:37 AM

To: Brandon Phipps &lt;bphipps@sausalito.gov&gt;, Beth Thompson &lt;bthompson@denovoplanning.com&gt;, Christina Erwin &lt;cerwin@denovoplanning.com&gt;

-----Original Message-----

From: Lori S &lt;lorischwanbeck@gmail.com&gt;

Sent: Tuesday, June 20, 2023 9:05 PM

To: [Citycouncil@sausalito.gov](mailto:Citycouncil@sausalito.gov); [czapata@sausalito.gov](mailto:czapata@sausalito.gov)

Subject: Comments on the Notice of Preparation and Scoping Meeting for the Draft Environmental Impact Report for City of Sausalito 6th Cycle Housing Element Programs

[EXTERNAL]

Dear Mr. Zapata and Members of the City Council

I am writing in response to the City of Sausalito Scoping Meeting Housing Element Statement letter in which it was stated that comments were being gathered on the proposed plan.

As a resident of Sausalito who deeply loves this community and land, I am very concerned about the current housing plan. I realize it is an extremely difficult endeavor to try to squeeze construction into a geological location that is bound by water, hills, a freeway and open space. However, the environmental and social impact of building high density housing in a town where the infrastructure has not been built to accommodate increased traffic, water use and parking is untenable.

Specifically and on a personal note, I am a homeowner on Girard Avenue, directly behind parcel #53. Seeing that it is zoned for up to 49 units (if I'm understanding the site map correctly) is highly disturbing. My home is my primary asset. And if construction of a building large enough to accommodate more than 2-3 stories goes up in front of us, our home and its aesthetic and financial value will be significantly impacted. I do not come from a family of wealth, and I must admit, I have a lot of fear of losing what I've worked incredibly hard to build. And what I cherish... my home. I am also confused as I thought there is law in Sausalito that prevents structures being built that obscure the views for homes. Is this law no longer in place?

Further, Girard is a curved street with a blind corner which already means we have accidents. Increasing the amount of traffic on our street increases the risk to walkers, children, cars and pets.

I implore you to reconsider the viability of building 49 units on parcel #53.

Sincerely  
Lori Schwanbeck

**From:** [Itoco Garcia](#)  
**To:** [Beth Thompson](#)  
**Cc:** [Brandon Phipps](#)  
**Subject:** Re: City of Sausalito Notice of Preparation Housing Element Programs Draft Environmental Impact Report  
**Date:** Friday, May 26, 2023 12:00:02 PM

---

Everything North of the road that bisects the campus and runs along the rightfield line of the ball field is where the housing project would go.  
In Solidarity,

Itoco Garcia Ed.D.  
Superintendent  
Sausalito Marin City School District  
Click the icon below to Follow:



On Fri, May 26, 2023 at 11:58 AM Itoco Garcia <[igarcia@smcsd.org](mailto:igarcia@smcsd.org)> wrote:

In Solidarity,

Itoco Garcia Ed.D.  
Superintendent  
Sausalito Marin City School District  
Click the icon below to Follow:



On Tue, May 23, 2023 at 11:34 AM Beth Thompson <[bthompson@denovoplanning.com](mailto:bthompson@denovoplanning.com)> wrote:

Hi Itoco,

Thank you for the response! Do you have a graphic that shows the general area where the housing is anticipated so we can show the correct location on our figures?

~~ Beth

Beth Thompson | Principal  
De Novo Planning Group | [www.denovoplanning.com](http://www.denovoplanning.com)  
[bthompson@denovoplanning.com](mailto:bthompson@denovoplanning.com) | 916.812.7927  
Northern California | 1020 Suncast Lane #106 | El Dorado Hills, CA 95762  
Southern California | 180 East Main Street #108 | Tustin, CA 92780

On Tue, May 23, 2023 at 10:55 AM Itoco Garcia <[igarcia@smcsd.org](mailto:igarcia@smcsd.org)> wrote:



Hi Beth and Brandon thanks for reaching out. I apologize for not being able to attend these housing element meetings more regularly- my only concern is that the housing element plan shows the work force housing we are trying to develop on the upper parking lot of our existing campus and it is intended to be on the opposite side (where there are currently are buildings that will soon be demolished)

In Solidarity,

Itoco Garcia Ed.D.  
Superintendent  
Sausalito Marin City School District  
Click the icon below to Follow:



On Mon, May 22, 2023 at 2:04 PM Beth Thompson  
<[bthompson@denovoplanning.com](mailto:bthompson@denovoplanning.com)> wrote:

Good afternoon,

This email is sent on behalf of the City of Sausalito to notify you of the public comment period for the Notice of Preparation (NOP) for the City of Sausalito Housing Element Programs Draft Environmental Impact Report.

Please see the attached NOP for information regarding the scope of the EIR, how to comment, where comments should be sent, and the comment period, which ends June 21, 2023.

For additional information, please contact Brandon Phipps, City of Sausalito Community & Economic Development Director at [bphipps@sausalito.gov](mailto:bphipps@sausalito.gov).

Thank you,  
Beth Thompson

Beth Thompson | Principal  
De Novo Planning Group | [www.denovoplanning.com](http://www.denovoplanning.com)  
Northern California | 1020 Suncast Lane #106 | El Dorado Hills, CA 95762  
Southern California | 180 East Main Street #108 | Tustin, CA 92780





Christina Erwin <cerwin@denovoplanning.com>

# FW: Urgent Concern: Housing Element/Dire Earthquake Hazard

1 message

Rudin, Sergio A. <SRudin@bwslaw.com>

Wed, Jun 21, 2023 at 10:19 AM

To: "bphipp@sausalito.gov" <bphipp@sausalito.gov>, Christina Erwin <cerwin@denovoplanning.com>, Beth Thompson <bthompson@denovoplanning.com>

**From:** Sue Stephenson <copywritersue@gmail.com>  
**Sent:** Tuesday, June 20, 2023 2:35 PM  
**To:** [citycouncil@sausalito.gov](mailto:citycouncil@sausalito.gov); [czapata@sausalito.gov](mailto:czapata@sausalito.gov)  
**Subject:** Urgent Concern: Housing Element/Dire Earthquake Hazard

**EXTERNAL**

Dear Mr. Zapata and Members of the City Council,

While I understand it's been nothing short of gargantuan to get a housing element plan in place, certain aspects of the current one *cannot be permitted* to come to fruition.

My focus here is on the safety of current and future residents. I refer specifically to site #301 and adjacent areas.

**Apart from the fact that adding density along our only thoroughfare is an irrefutable danger to our residents, who will not be able to quickly evacuate in the event of any emergency, there is another grave problem: the build falls in a severe earthquake liquefaction zone.**



The Book Club Favorite that Ignites Discussion  
**A Mystery Set in Sausalito, SF, and on the Sausalito Ferry**  
 Click here to learn more!

Sausalito Earthquake Safety and Liquefaction Map  
[oursausalito.com](http://oursausalito.com)

Putting low-income (or any income) housing in a highly dangerous environment—whether that be toxic, shoddily built or geologically treacherous—not only sets the stage for catastrophic loss of life; it also exposes our little city to all manner of legal action, tragic for all. A small scale Hurricane Katrina situation in the making.

Furthermore, we cannot be so zealous in our need to "hit the numbers" that we fail to consider impacts like these.

Personally, I am incredulous that our town did not join the statewide lawsuit challenging the mandate. We are a perfect example of place that, politically-speaking, welcomes all...but our land features, available acreage, and emergency accessibility FULLY NECESSITATES a modification to the number of units earmarked for the area and their placement.

And what I've cited here is a very good example of why.

I implore you to work to alter the plan and its scope, in whatever way possible.

Sincerely yours,

Sue Stephenson

403 Bonita

Sent from my iPad

May 26, 2023

To: Brandon Phipps, Community and Economic Development Director, City of Sausalito  
From: Wolfback Ridge Association  
Vipul Patel, President

RE: Notice of Preparation 30-Day Comment Period - Sausalito 6<sup>th</sup> Cycle Housing Element Programs

I am writing on behalf of the Board of Directors of Wolfback Ridge Association regarding the Sausalito Housing Element Report. Several lots in our neighborhood have been identified for possible development of multi-family homes to meet the city's requirement to build 724 new homes in the next 8 years.

We do not think these lots on Wolfback Ridge would be an appropriate multi-family development for the neighborhood for the following reasons:

- 1) Wolfback Ridge was developed for one single family residence per lot. Both the Settlement Agreement with Sausalito and the associated EIRs would be violated if this would change.
- 2) We have one private road that provides egress and ingress for the neighborhood via easements. The Wolfback Ridge Association maintains the roads and increasing the population more significantly than planned would damage the roads more quickly and make emergency evacuations more difficult. The funds for maintenance are collected from property owners by the Association and we do not get funding from City of Sausalito or County of Marin for road maintenance. Further, because of the complexity of the easements, expansion of the roads to accommodate more traffic would not be possible.
- 3) All homes on Wolfback Ridge have their own septic system. A multi-family residence would need enough land on their lot to accommodate such a large system including leach fields.
- 4) There is no street parking in the neighborhood. This would mean that each multi-family unit would have to have parking somewhere on the lot minimizing the space for housing and septic leach fields.
- 5) We are not serviced by public transportation. This would mean that everyone living here would have to have a car, increasing the traffic on the road. Further, walking on the roads is a major safety issue. We currently have the general public that trespass by walking on the road to get to GGNRA trails versus using Morning Sun Trail. There are no sidewalks for them to walk on. Safety is always an issue, particularly around the sharp curve at the crest of Wolfback Ridge Road.
- 6) It is unlikely that GGNRA would approve development particularly on the western facing lots. A house was going to be built at 44 Wolfback Ridge Road a few years ago. There was strenuous pushback by both GGNRA and environmental groups that resulted in the prospective builders abandoning the idea and donating the land to the park. Further, because of the minimal area for the septic system, it was going to have to be close to a GGNRA trail. There would be the same proximity issue for building on any of those westward facing lots.

If you have any questions, you can me at [vyper33@gmail.com](mailto:vyper33@gmail.com).

Thank you.

Sincerely,



Vipul Patel  
President  
Wolfback Ridge Association



Christina Erwin <cerwin@denovoplanning.com>

# FW: Urgent Concern: Housing Element/Dire Earthquake Hazard

1 message

**Brandon Phipps** <bhipps@sausalito.gov>  
To: Beth Thompson <bthompson@denovoplanning.com>  
Cc: Christina Erwin <cerwin@denovoplanning.com>

Wed, Jun 21, 2023 at 10:07 AM

Beth and Christina,

Comments in connection with the Sausalito HE – for our reference / records.

Kind regards,

Brandon



**BRANDON PHIPPS**

**Community & Economic Development Director**

City of Sausalito | Community Development Department

420 Litho Street, Sausalito, CA 94965

Direct: (415) 289-4142 | Cell: (628) 288-9697 | Fax: (415) 289-4167

**From:** Chris Zapata <czapata@sausalito.gov>  
**Sent:** Tuesday, June 20, 2023 3:12 PM  
**To:** Brandon Phipps <bhipps@sausalito.gov>; Sergio Rudin <SRudin@bwsllaw.com>; Jeffery Luxenberg <jluxenbergpc@comcast.net>; Andrew Junius <AjuniusPC@reubenlaw.com>  
**Subject:** FW: Urgent Concern: Housing Element/Dire Earthquake Hazard

FYI

Chris

**From:** Sue Stephenson <copywritersue@gmail.com>  
**Sent:** Tuesday, June 20, 2023 2:35 PM  
**To:** City Council <citycouncil@sausalito.gov>; Chris Zapata <czapata@sausalito.gov>  
**Subject:** Urgent Concern: Housing Element/Dire Earthquake Hazard

Dear Mr. Zapata and Members of the City Council,

While I understand it's been nothing short of gargantuan to get a housing element plan in place, certain aspects of the current one *cannot be permitted* to come to fruition.

My focus here is on the safety of current and future residents. I refer specifically to site #301 and adjacent areas.

**Apart from the fact that adding density along our only thoroughfare is an irrefutable danger to our residents, who will not be able to quickly evacuate in the event of any emergency, there is another grave problem: the build falls in a severe earthquake liquefaction zone.**



The Book Club Favorite that Ignites Discussion  
A Mystery Set in Sausalito, SF, and on the Sausalito Ferry  
*Click here to learn more!*

Sausalito Earthquake Safety and Liquefaction Map  
[oursausalito.com](http://oursausalito.com)

Putting low-income (or any income) housing in a highly dangerous environment—whether that be toxic, shoddily built or geologically treacherous—not only sets the stage for catastrophic loss of life; it also exposes our little city to all manner of legal action, tragic for all. A small scale Hurricane Katrina situation in the making.

Furthermore, we cannot be so zealous in our need to “hit the numbers” that we fail to consider impacts like these.

Personally, I am incredulous that our town did not join the statewide lawsuit challenging the mandate. We are a perfect example of place that, politically-speaking, welcomes all...but our land features, available acreage, and emergency accessibility FULLY NECESSITATES a modification to the number of units earmarked for the area and their placement.

And what I've cited here is a very good example of why.

I implore you to work to alter the plan and its scope, in whatever way possible.

Sincerely yours,

Sue Stephenson

403 Bonita

Sent from my iPad

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**image001.jpg**  
12K

## **APPENDIX B**

**Air Quality, Greenhouse Gas, and Energy Calculations**



# Sausalito Housing Element Detailed Report

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# 1. Basic Project Information

## 1.1. Basic Project Information

Data Field	Value
Project Name	Sausalito Housing Element
Construction Start Date	1/1/2024
Operational Year	2025
Lead Agency	—
Land Use Scale	Project/site
Analysis Level for Defaults	County
Windspeed (m/s)	3.90
Precipitation (days)	34.8
Location	37.859257460344125, -122.4861144010782
County	Marin
City	Sausalito
Air District	Bay Area AQMD
Air Basin	San Francisco Bay Area
TAZ	904
EDFZ	2
Electric Utility	Pacific Gas & Electric Company
Gas Utility	Pacific Gas & Electric
App Version	2022.1.1.14

## 1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description
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Condo/Townhouse	959	Dwelling Unit	59.9	1,016,540	0.00	0.00	2,302	—
Strip Mall	16.9	1000sqft	0.39	16,852	0.00	0.00	—	—

### 1.3. User-Selected Emission Reduction Measures by Emissions Sector

No measures selected

## 2. Emissions Summary

### 2.1. Construction Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	4.41	194	36.0	42.6	0.06	1.60	19.8	21.4	1.47	10.1	11.6	—	11,361	11,361	0.48	0.65	31.9	11,599
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	4.63	3.87	34.4	42.0	0.06	1.45	9.37	10.8	1.33	3.69	5.02	—	11,121	11,121	0.53	0.69	0.88	11,341
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	2.99	40.2	16.2	27.9	0.03	0.67	5.68	6.35	0.62	2.39	3.00	—	7,842	7,842	0.36	0.48	9.83	8,003
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.55	7.33	2.96	5.10	0.01	0.12	1.04	1.16	0.11	0.44	0.55	—	1,298	1,298	0.06	0.08	1.63	1,325

### 2.2. Construction Emissions by Year, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Year	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
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Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2024	4.41	3.71	36.0	33.7	0.06	1.60	19.8	21.4	1.47	10.1	11.6	—	6,774	6,774	0.27	0.06	0.76	6,799
2025	4.33	3.77	16.4	42.6	0.04	0.47	6.51	6.98	0.44	1.55	1.99	—	11,361	11,361	0.48	0.65	31.9	11,599
2026	4.12	3.60	15.3	40.7	0.04	0.42	6.51	6.93	0.39	1.55	1.94	—	11,192	11,192	0.45	0.65	29.1	11,427
2027	3.95	3.26	14.7	38.8	0.04	0.38	6.51	6.89	0.35	1.55	1.90	—	11,022	11,022	0.45	0.65	26.3	11,254
2028	3.79	3.13	13.8	37.4	0.04	0.34	6.51	6.85	0.32	1.55	1.87	—	10,848	10,848	0.41	0.45	23.7	11,018
2029	0.85	194	6.49	10.4	0.01	0.24	1.15	1.16	0.22	0.27	0.28	—	1,631	1,631	0.06	0.01	3.26	1,637
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2024	4.63	3.87	34.4	42.0	0.06	1.45	9.37	10.8	1.33	3.69	5.02	—	11,121	11,121	0.53	0.69	0.88	11,341
2025	4.23	3.67	17.0	40.0	0.04	0.47	6.51	6.98	0.44	1.55	1.99	—	10,957	10,957	0.51	0.67	0.82	11,170
2026	4.03	3.31	16.0	38.0	0.04	0.42	6.51	6.93	0.39	1.55	1.94	—	10,797	10,797	0.48	0.67	0.75	11,009
2027	3.87	3.19	15.1	36.4	0.04	0.38	6.51	6.89	0.35	1.55	1.90	—	10,634	10,634	0.48	0.67	0.68	10,846
2028	3.73	3.05	14.4	35.2	0.04	0.34	6.51	6.85	0.32	1.55	1.87	—	10,468	10,468	0.44	0.63	0.62	10,668
2029	3.59	2.96	13.7	33.8	0.04	0.31	6.51	6.83	0.27	1.55	1.83	—	10,296	10,296	0.44	0.63	0.55	10,497
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2024	2.26	1.90	16.2	17.4	0.03	0.67	5.68	6.35	0.62	2.39	3.00	—	3,834	3,834	0.16	0.10	1.71	3,869
2025	2.99	2.59	12.0	27.9	0.03	0.34	4.55	4.89	0.31	1.08	1.40	—	7,842	7,842	0.36	0.48	9.83	8,003
2026	2.86	2.35	11.2	26.6	0.03	0.30	4.55	4.85	0.28	1.08	1.36	—	7,728	7,728	0.34	0.48	8.97	7,888
2027	2.75	2.25	10.7	25.6	0.03	0.27	4.55	4.82	0.25	1.08	1.33	—	7,611	7,611	0.33	0.47	8.13	7,767
2028	2.66	2.17	10.1	24.7	0.03	0.24	4.56	4.81	0.23	1.09	1.31	—	7,513	7,513	0.32	0.45	7.34	7,663
2029	0.56	40.2	2.59	5.62	0.01	0.08	0.74	0.82	0.07	0.18	0.24	—	1,363	1,363	0.05	0.06	1.02	1,384
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2024	0.41	0.35	2.96	3.18	0.01	0.12	1.04	1.16	0.11	0.44	0.55	—	635	635	0.03	0.02	0.28	641
2025	0.55	0.47	2.19	5.10	0.01	0.06	0.83	0.89	0.06	0.20	0.25	—	1,298	1,298	0.06	0.08	1.63	1,325

2026	0.52	0.43	2.05	4.86	0.01	0.05	0.83	0.88	0.05	0.20	0.25	—	1,279	1,279	0.06	0.08	1.48	1,306
2027	0.50	0.41	1.96	4.67	0.01	0.05	0.83	0.88	0.05	0.20	0.24	—	1,260	1,260	0.05	0.08	1.35	1,286
2028	0.49	0.40	1.85	4.51	0.01	0.04	0.83	0.88	0.04	0.20	0.24	—	1,244	1,244	0.05	0.08	1.21	1,269
2029	0.10	7.33	0.47	1.03	< 0.005	0.01	0.14	0.15	0.01	0.03	0.04	—	226	226	0.01	0.01	0.17	229

## 2.4. Operations Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	42.3	53.8	32.3	340	0.70	0.99	61.0	62.0	0.95	15.4	16.4	450	77,885	78,335	49.0	2.61	273	80,611
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	36.0	47.6	36.4	273	0.67	0.96	61.0	61.9	0.93	15.4	16.4	450	74,019	74,469	49.3	2.88	14.3	76,575
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	34.5	46.4	32.1	264	0.60	0.93	54.7	55.7	0.90	13.9	14.8	450	67,772	68,222	48.9	2.52	111	70,307
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	6.30	8.46	5.86	48.1	0.11	0.17	9.99	10.2	0.16	2.53	2.69	74.5	11,220	11,295	8.09	0.42	18.3	11,640

## 2.5. Operations Emissions by Sector, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Sector	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Sausalito Housing Element Detailed Report, 7/31/2023

Mobile	36.3	33.4	25.5	283	0.66	0.45	61.0	61.4	0.42	15.4	15.9	—	67,322	67,322	2.78	2.41	266	68,375
Area	5.29	20.0	0.54	55.0	< 0.005	0.03	—	0.03	0.02	—	0.02	0.00	148	148	0.01	< 0.005	—	149
Energy	0.74	0.37	6.31	2.70	0.04	0.51	—	0.51	0.51	—	0.51	—	10,305	10,305	1.08	0.06	—	10,350
Water	—	—	—	—	—	—	—	—	—	—	—	57.9	109	167	5.96	0.14	—	359
Waste	—	—	—	—	—	—	—	—	—	—	—	392	0.00	392	39.2	0.00	—	1,371
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	7.39	7.39
Total	42.3	53.8	32.3	340	0.70	0.99	61.0	62.0	0.95	15.4	16.4	450	77,885	78,335	49.0	2.61	273	80,611
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	35.3	32.2	30.1	270	0.63	0.45	61.0	61.4	0.42	15.4	15.9	—	63,605	63,605	3.13	2.68	6.90	64,489
Area	0.00	15.0	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00
Energy	0.74	0.37	6.31	2.70	0.04	0.51	—	0.51	0.51	—	0.51	—	10,305	10,305	1.08	0.06	—	10,350
Water	—	—	—	—	—	—	—	—	—	—	—	57.9	109	167	5.96	0.14	—	359
Waste	—	—	—	—	—	—	—	—	—	—	—	392	0.00	392	39.2	0.00	—	1,371
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	7.39	7.39
Total	36.0	47.6	36.4	273	0.67	0.96	61.0	61.9	0.93	15.4	16.4	450	74,019	74,469	49.3	2.88	14.3	76,575
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	31.2	28.5	25.6	234	0.56	0.40	54.7	55.1	0.38	13.9	14.2	—	57,285	57,285	2.69	2.32	103	58,146
Area	2.61	17.5	0.27	27.1	< 0.005	0.01	—	0.01	0.01	—	0.01	0.00	73.2	73.2	< 0.005	< 0.005	—	73.5
Energy	0.74	0.37	6.31	2.70	0.04	0.51	—	0.51	0.51	—	0.51	—	10,305	10,305	1.08	0.06	—	10,350
Water	—	—	—	—	—	—	—	—	—	—	—	57.9	109	167	5.96	0.14	—	359
Waste	—	—	—	—	—	—	—	—	—	—	—	392	0.00	392	39.2	0.00	—	1,371
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	7.39	7.39
Total	34.5	46.4	32.1	264	0.60	0.93	54.7	55.7	0.90	13.9	14.8	450	67,772	68,222	48.9	2.52	111	70,307
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	5.69	5.20	4.66	42.7	0.10	0.07	9.99	10.1	0.07	2.53	2.60	—	9,484	9,484	0.44	0.38	17.1	9,627
Area	0.48	3.19	0.05	4.95	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	0.00	12.1	12.1	< 0.005	< 0.005	—	12.2

Energy	0.13	0.07	1.15	0.49	0.01	0.09	—	0.09	0.09	—	0.09	—	1,706	1,706	0.18	0.01	—	1,714
Water	—	—	—	—	—	—	—	—	—	—	—	9.59	18.1	27.7	0.99	0.02	—	59.4
Waste	—	—	—	—	—	—	—	—	—	—	—	64.9	0.00	64.9	6.48	0.00	—	227
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1.22	1.22
Total	6.30	8.46	5.86	48.1	0.11	0.17	9.99	10.2	0.16	2.53	2.69	74.5	11,220	11,295	8.09	0.42	18.3	11,640

### 3. Construction Emissions Details

#### 3.1. Site Preparation (2024) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	4.34	3.65	36.0	32.9	0.05	1.60	—	1.60	1.47	—	1.47	—	5,296	5,296	0.21	0.04	—	5,314
Dust From Material Movement	—	—	—	—	—	—	19.7	19.7	—	10.1	10.1	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.48	0.40	3.94	3.61	0.01	0.18	—	0.18	0.16	—	0.16	—	580	580	0.02	< 0.005	—	582

Dust From Material Movement:	—	—	—	—	—	—	2.15	2.15	—	1.11	1.11	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.09	0.07	0.72	0.66	< 0.005	0.03	—	0.03	0.03	—	0.03	—	96.1	96.1	< 0.005	< 0.005	—	96.4
Dust From Material Movement:	—	—	—	—	—	—	0.39	0.39	—	0.20	0.20	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.07	0.07	0.05	0.74	0.00	0.00	0.14	0.14	0.00	0.03	0.03	—	154	154	< 0.005	0.01	0.66	156
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.01	0.07	0.00	0.00	0.02	0.02	0.00	< 0.005	< 0.005	—	15.8	15.8	< 0.005	< 0.005	0.03	16.0
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	2.61	2.61	< 0.005	< 0.005	0.01	2.65
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
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### 3.3. Grading (2024) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e	
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	4.19	3.52	34.3	30.2	0.06	1.45	—	1.45	1.33	—	1.33	—	6,598	6,598	0.27	0.05	—	6,621	
Dust From Material Movement	—	—	—	—	—	—	9.20	9.20	—	3.65	3.65	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	4.19	3.52	34.3	30.2	0.06	1.45	—	1.45	1.33	—	1.33	—	6,598	6,598	0.27	0.05	—	6,621	
Dust From Material Movement	—	—	—	—	—	—	9.20	9.20	—	3.65	3.65	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.26	1.06	10.3	9.09	0.02	0.44	—	0.44	0.40	—	0.40	—	1,988	1,988	0.08	0.02	—	1,995	

Dust From Material Movement:	—	—	—	—	—	—	2.77	2.77	—	1.10	1.10	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.23	0.19	1.89	1.66	< 0.005	0.08	—	0.08	0.07	—	0.07	—	329	329	0.01	< 0.005	—	330
Dust From Material Movement:	—	—	—	—	—	—	0.51	0.51	—	0.20	0.20	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.08	0.08	0.05	0.84	0.00	0.00	0.17	0.17	0.00	0.04	0.04	—	176	176	< 0.005	0.01	0.76	179
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.08	0.07	0.07	0.75	0.00	0.00	0.17	0.17	0.00	0.04	0.04	—	164	164	< 0.005	0.01	0.02	166
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.02	0.02	0.02	0.22	0.00	0.00	0.05	0.05	0.00	0.01	0.01	—	49.6	49.6	< 0.005	< 0.005	0.10	50.4
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.04	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	8.22	8.22	< 0.005	< 0.005	0.02	8.34
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

### 3.5. Building Construction (2024) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.44	1.20	11.2	13.1	0.02	0.50	—	0.50	0.46	—	0.46	—	2,398	2,398	0.10	0.02	—	2,406
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.15	0.13	1.21	1.41	< 0.005	0.05	—	0.05	0.05	—	0.05	—	258	258	0.01	< 0.005	—	259
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.03	0.02	0.22	0.26	< 0.005	0.01	—	0.01	0.01	—	0.01	—	42.7	42.7	< 0.005	< 0.005	—	42.9
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—



Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	2.79	2.54	2.39	26.2	0.00	0.00	5.75	5.75	0.00	1.35	1.35	—	5,706	5,706	0.17	0.24	0.69	5,783
Vendor	0.40	0.13	4.69	2.61	0.02	0.04	0.76	0.80	0.04	0.20	0.24	—	3,017	3,017	0.27	0.43	0.20	3,152
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.30	0.27	0.23	2.73	0.00	0.00	0.61	0.61	0.00	0.14	0.14	—	617	617	0.02	0.03	1.23	626
Vendor	0.04	0.01	0.50	0.28	< 0.005	< 0.005	0.08	0.08	< 0.005	0.02	0.03	—	325	325	0.03	0.05	0.35	340
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.05	0.05	0.04	0.50	0.00	0.00	0.11	0.11	0.00	0.03	0.03	—	102	102	< 0.005	< 0.005	0.20	104
Vendor	0.01	< 0.005	0.09	0.05	< 0.005	< 0.005	0.01	0.02	< 0.005	< 0.005	< 0.005	—	53.8	53.8	< 0.005	0.01	0.06	56.2
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

### 3.7. Building Construction (2025) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.35	1.13	10.4	13.0	0.02	0.43	—	0.43	0.40	—	0.40	—	2,398	2,398	0.10	0.02	—	2,406
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.35	1.13	10.4	13.0	0.02	0.43	—	0.43	0.40	—	0.40	—	2,398	2,398	0.10	0.02	—	2,406
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.96	0.80	7.46	9.31	0.02	0.31	—	0.31	0.28	—	0.28	—	1,713	1,713	0.07	0.01	—	1,719
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.18	0.15	1.36	1.70	< 0.005	0.06	—	0.06	0.05	—	0.05	—	284	284	0.01	< 0.005	—	285
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	2.58	2.52	1.72	27.1	0.00	0.00	5.75	5.75	0.00	1.35	1.35	—	6,000	6,000	0.12	0.23	24.3	6,094
Vendor	0.40	0.12	4.21	2.43	0.02	0.04	0.76	0.80	0.04	0.20	0.24	—	2,963	2,963	0.26	0.41	7.56	3,099
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	2.51	2.43	2.18	24.4	0.00	0.00	5.75	5.75	0.00	1.35	1.35	—	5,595	5,595	0.15	0.24	0.63	5,672
Vendor	0.38	0.11	4.42	2.48	0.02	0.04	0.76	0.80	0.04	0.20	0.24	—	2,964	2,964	0.26	0.41	0.20	3,093
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Worker	1.75	1.70	1.40	16.9	0.00	0.00	4.02	4.02	0.00	0.94	0.94	—	4,013	4,013	0.10	0.17	7.50	4,074
Vendor	0.28	0.08	3.12	1.76	0.01	0.03	0.53	0.56	0.03	0.14	0.17	—	2,117	2,117	0.19	0.29	2.33	2,211
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.32	0.31	0.26	3.08	0.00	0.00	0.73	0.73	0.00	0.17	0.17	—	664	664	0.02	0.03	1.24	675
Vendor	0.05	0.01	0.57	0.32	< 0.005	0.01	0.10	0.10	0.01	0.03	0.03	—	350	350	0.03	0.05	0.39	366
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

### 3.9. Building Construction (2026) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.28	1.07	9.85	13.0	0.02	0.38	—	0.38	0.35	—	0.35	—	2,397	2,397	0.10	0.02	—	2,405
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.28	1.07	9.85	13.0	0.02	0.38	—	0.38	0.35	—	0.35	—	2,397	2,397	0.10	0.02	—	2,405
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.91	0.77	7.04	9.26	0.02	0.27	—	0.27	0.25	—	0.25	—	1,712	1,712	0.07	0.01	—	1,718

Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.17	0.14	1.28	1.69	< 0.005	0.05	—	0.05	0.05	—	0.05	—	283	283	0.01	< 0.005	—	284	
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	
Worker	2.46	2.41	1.51	25.4	0.00	0.00	5.75	5.75	0.00	1.35	1.35	—	5,887	5,887	0.11	0.23	22.2	5,979	
Vendor	0.38	0.11	3.98	2.33	0.02	0.04	0.76	0.80	0.04	0.20	0.24	—	2,908	2,908	0.24	0.41	6.91	3,042	
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	
Worker	2.38	2.13	1.97	22.7	0.00	0.00	5.75	5.75	0.00	1.35	1.35	—	5,491	5,491	0.14	0.24	0.57	5,567	
Vendor	0.37	0.11	4.19	2.37	0.02	0.04	0.76	0.80	0.04	0.20	0.24	—	2,908	2,908	0.24	0.41	0.18	3,036	
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	
Worker	1.68	1.51	1.25	15.7	0.00	0.00	4.02	4.02	0.00	0.94	0.94	—	3,938	3,938	0.10	0.17	6.84	3,999	
Vendor	0.27	0.08	2.94	1.68	0.01	0.03	0.53	0.56	0.03	0.14	0.17	—	2,077	2,077	0.17	0.29	2.13	2,170	
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	
Worker	0.31	0.28	0.23	2.86	0.00	0.00	0.73	0.73	0.00	0.17	0.17	—	652	652	0.02	0.03	1.13	662	
Vendor	0.05	0.01	0.54	0.31	< 0.005	0.01	0.10	0.10	0.01	0.03	0.03	—	344	344	0.03	0.05	0.35	359	
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	

### 3.11. Building Construction (2027) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.23	1.03	9.39	12.9	0.02	0.34	—	0.34	0.31	—	0.31	—	2,397	2,397	0.10	0.02	—	2,405
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.23	1.03	9.39	12.9	0.02	0.34	—	0.34	0.31	—	0.31	—	2,397	2,397	0.10	0.02	—	2,405
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.88	0.74	6.71	9.24	0.02	0.24	—	0.24	0.22	—	0.22	—	1,712	1,712	0.07	0.01	—	1,718
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.16	0.13	1.22	1.69	< 0.005	0.04	—	0.04	0.04	—	0.04	—	283	283	0.01	< 0.005	—	284
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	2.37	2.13	1.49	23.7	0.00	0.00	5.75	5.75	0.00	1.35	1.35	—	5,780	5,780	0.11	0.23	20.1	5,870
Vendor	0.35	0.11	3.77	2.24	0.02	0.04	0.76	0.80	0.04	0.20	0.24	—	2,845	2,845	0.24	0.41	6.19	2,979
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	2.29	2.05	1.76	21.2	0.00	0.00	5.75	5.75	0.00	1.35	1.35	—	5,391	5,391	0.14	0.24	0.52	5,467
Vendor	0.35	0.10	3.98	2.28	0.02	0.04	0.76	0.80	0.04	0.20	0.24	—	2,846	2,846	0.24	0.41	0.16	2,974
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	1.62	1.44	1.24	14.7	0.00	0.00	4.02	4.02	0.00	0.94	0.94	—	3,867	3,867	0.09	0.16	6.22	3,923
Vendor	0.25	0.07	2.79	1.61	0.01	0.03	0.53	0.56	0.03	0.14	0.17	—	2,033	2,033	0.17	0.29	1.91	2,126
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.29	0.26	0.23	2.69	0.00	0.00	0.73	0.73	0.00	0.17	0.17	—	640	640	0.01	0.03	1.03	650
Vendor	0.05	0.01	0.51	0.29	< 0.005	0.01	0.10	0.10	0.01	0.03	0.03	—	337	337	0.03	0.05	0.32	352
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

### 3.13. Building Construction (2028) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road Equipment	1.18	0.99	8.92	12.9	0.02	0.30	—	0.30	0.28	—	0.28	—	2,397	2,397	0.10	0.02	—	2,406
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.18	0.99	8.92	12.9	0.02	0.30	—	0.30	0.28	—	0.28	—	2,397	2,397	0.10	0.02	—	2,406
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.85	0.71	6.39	9.26	0.02	0.22	—	0.22	0.20	—	0.20	—	1,717	1,717	0.07	0.01	—	1,723
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.15	0.13	1.17	1.69	< 0.005	0.04	—	0.04	0.04	—	0.04	—	284	284	0.01	< 0.005	—	285
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	2.28	2.05	1.30	22.3	0.00	0.00	5.75	5.75	0.00	1.35	1.35	—	5,678	5,678	0.09	0.05	18.2	5,712
Vendor	0.33	0.09	3.57	2.13	0.02	0.04	0.76	0.80	0.04	0.20	0.24	—	2,772	2,772	0.22	0.39	5.52	2,899
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	2.22	1.97	1.73	20.0	0.00	0.00	5.75	5.75	0.00	1.35	1.35	—	5,297	5,297	0.12	0.23	0.47	5,367

Vendor	0.33	0.08	3.74	2.19	0.02	0.04	0.76	0.80	0.04	0.20	0.24	—	2,773	2,773	0.22	0.39	0.14	2,895
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	1.58	1.40	1.09	13.9	0.00	0.00	4.03	4.03	0.00	0.94	0.94	—	3,809	3,809	0.09	0.16	5.63	3,865
Vendor	0.24	0.06	2.64	1.55	0.01	0.03	0.54	0.56	0.03	0.14	0.17	—	1,986	1,986	0.16	0.28	1.71	2,075
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.29	0.26	0.20	2.53	0.00	0.00	0.74	0.74	0.00	0.17	0.17	—	631	631	0.01	0.03	0.93	640
Vendor	0.04	0.01	0.48	0.28	< 0.005	0.01	0.10	0.10	0.01	0.03	0.03	—	329	329	0.03	0.05	0.28	343
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

### 3.15. Building Construction (2029) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.15	0.97	8.58	12.9	0.02	0.28	—	0.28	0.25	—	0.25	—	2,397	2,397	0.10	0.02	—	2,405
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.09	0.07	0.65	0.98	< 0.005	0.02	—	0.02	0.02	—	0.02	—	183	183	0.01	< 0.005	—	184



Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.01	0.12	0.18	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	30.3	30.3	< 0.005	< 0.005	—	30.4	
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	
Worker	2.14	1.91	1.54	18.8	0.00	0.00	5.75	5.75	0.00	1.35	1.35	—	5,207	5,207	0.12	0.23	0.42	5,278	
Vendor	0.30	0.08	3.54	2.10	0.02	0.04	0.76	0.80	0.02	0.20	0.22	—	2,692	2,692	0.22	0.39	0.13	2,814	
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	
Worker	0.16	0.14	0.11	1.38	0.00	0.00	0.43	0.43	0.00	0.10	0.10	—	399	399	0.01	0.02	0.54	405	
Vendor	0.02	0.01	0.27	0.16	< 0.005	< 0.005	0.06	0.06	< 0.005	0.02	0.02	—	205	205	0.02	0.03	0.16	215	
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	
Worker	0.03	0.03	0.02	0.25	0.00	0.00	0.08	0.08	0.00	0.02	0.02	—	66.1	66.1	< 0.005	< 0.005	0.09	67.0	
Vendor	< 0.005	< 0.005	0.05	0.03	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	34.0	34.0	< 0.005	< 0.005	0.03	35.6	
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	

### 3.17. Paving (2029) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
----------	-----	-----	-----	----	-----	-------	-------	-------	--------	--------	--------	------	-------	------	-----	-----	---	------

Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.80	0.67	6.46	9.92	0.01	0.24	—	0.24	0.22	—	0.22	—	1,511	1,511	0.06	0.01	—	1,516
Paving	—	0.00	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.80	0.67	6.46	9.92	0.01	0.24	—	0.24	0.22	—	0.22	—	1,511	1,511	0.06	0.01	—	1,516
Paving	—	0.00	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.16	0.14	1.33	2.04	< 0.005	0.05	—	0.05	0.05	—	0.05	—	310	310	0.01	< 0.005	—	311
Paving	—	0.00	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.03	0.03	0.24	0.37	< 0.005	0.01	—	0.01	0.01	—	0.01	—	51.4	51.4	< 0.005	< 0.005	—	51.6
Paving	—	0.00	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.05	0.04	0.03	0.45	0.00	0.00	0.12	0.12	0.00	0.03	0.03	—	120	120	< 0.005	< 0.005	0.35	121
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.05	0.04	0.03	0.40	0.00	0.00	0.12	0.12	0.00	0.03	0.03	—	112	112	< 0.005	< 0.005	0.01	114
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.01	0.08	0.00	0.00	0.02	0.02	0.00	0.01	0.01	—	23.2	23.2	< 0.005	< 0.005	0.03	23.5
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	3.83	3.83	< 0.005	< 0.005	0.01	3.89
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

### 3.19. Architectural Coating (2029) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road Equipment	0.12	0.10	0.79	1.11	< 0.005	0.01	—	0.01	0.01	—	0.01	—	134	134	0.01	< 0.005	—	134
Architectural Coatings	—	193	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.03	0.02	0.16	0.23	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	27.4	27.4	< 0.005	< 0.005	—	27.5
Architectural Coatings	—	39.7	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.03	0.04	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	4.54	4.54	< 0.005	< 0.005	—	4.56
Architectural Coatings	—	7.25	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.44	0.39	0.25	4.20	0.00	0.00	1.15	1.15	0.00	0.27	0.27	—	1,116	1,116	0.02	0.01	3.26	1,123
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.09	0.08	0.06	0.75	0.00	0.00	0.23	0.23	0.00	0.05	0.05	—	215	215	< 0.005	0.01	0.29	218
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.02	0.01	0.01	0.14	0.00	0.00	0.04	0.04	0.00	0.01	0.01	—	35.6	35.6	< 0.005	< 0.005	0.05	36.1
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

## 4. Operations Emissions Details

### 4.1. Mobile Emissions by Land Use

#### 4.1.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Condo/Townhouse	32.8	30.3	22.7	252	0.59	0.40	54.0	54.4	0.37	13.7	14.0	—	59,654	59,654	2.50	2.15	236	60,592
Strip Mall	3.45	3.14	2.76	31.0	0.08	0.05	6.98	7.03	0.05	1.77	1.81	—	7,668	7,668	0.29	0.26	30.5	7,783
Total	36.3	33.4	25.5	283	0.66	0.45	61.0	61.4	0.42	15.4	15.9	—	67,322	67,322	2.78	2.41	266	68,375

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Condo/Townhouse	31.9	29.2	26.8	241	0.55	0.40	54.0	54.4	0.37	13.7	14.0	—	56,364	56,364	2.81	2.39	6.11	57,153
Strip Mall	3.37	3.04	3.26	28.9	0.07	0.05	6.98	7.03	0.05	1.77	1.81	—	7,241	7,241	0.31	0.29	0.79	7,336
Total	35.3	32.2	30.1	270	0.63	0.45	61.0	61.4	0.42	15.4	15.9	—	63,605	63,605	3.13	2.68	6.90	64,489
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Condo/Townhouse	5.13	4.70	4.15	38.0	0.09	0.06	8.82	8.89	0.06	2.23	2.30	—	8,383	8,383	0.40	0.34	15.1	8,510
Strip Mall	0.55	0.50	0.52	4.69	0.01	0.01	1.17	1.17	0.01	0.30	0.30	—	1,101	1,101	0.05	0.04	1.99	1,117
Total	5.69	5.20	4.66	42.7	0.10	0.07	9.99	10.1	0.07	2.53	2.60	—	9,484	9,484	0.44	0.38	17.1	9,627

## 4.2. Energy

### 4.2.1. Electricity Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Condo/Townhouse	—	—	—	—	—	—	—	—	—	—	—	—	2,218	2,218	0.36	0.04	—	2,240
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	—	78.6	78.6	0.01	< 0.005	—	79.4
Total	—	—	—	—	—	—	—	—	—	—	—	—	2,297	2,297	0.37	0.05	—	2,319
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Condo/T	—	—	—	—	—	—	—	—	—	—	—	—	2,218	2,218	0.36	0.04	—	2,240
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	—	78.6	78.6	0.01	< 0.005	—	79.4
Total	—	—	—	—	—	—	—	—	—	—	—	—	2,297	2,297	0.37	0.05	—	2,319
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Condo/T ownhous e	—	—	—	—	—	—	—	—	—	—	—	—	367	367	0.06	0.01	—	371
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	—	13.0	13.0	< 0.005	< 0.005	—	13.1
Total	—	—	—	—	—	—	—	—	—	—	—	—	380	380	0.06	0.01	—	384

#### 4.2.3. Natural Gas Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Condo/T ownhous e	0.74	0.37	6.28	2.67	0.04	0.51	—	0.51	0.51	—	0.51	—	7,973	7,973	0.71	0.02	—	7,996
Strip Mall	< 0.005	< 0.005	0.03	0.02	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	34.7	34.7	< 0.005	< 0.005	—	34.8
Total	0.74	0.37	6.31	2.70	0.04	0.51	—	0.51	0.51	—	0.51	—	8,008	8,008	0.71	0.02	—	8,030
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Condo/T ownhous e	0.74	0.37	6.28	2.67	0.04	0.51	—	0.51	0.51	—	0.51	—	7,973	7,973	0.71	0.02	—	7,996
Strip Mall	< 0.005	< 0.005	0.03	0.02	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	34.7	34.7	< 0.005	< 0.005	—	34.8
Total	0.74	0.37	6.31	2.70	0.04	0.51	—	0.51	0.51	—	0.51	—	8,008	8,008	0.71	0.02	—	8,030
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Condo/T	0.13	0.07	1.15	0.49	0.01	0.09	—	0.09	0.09	—	0.09	—	1,320	1,320	0.12	< 0.005	—	1,324
Strip Mall	< 0.005	< 0.005	0.01	< 0.005	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	5.75	5.75	< 0.005	< 0.005	—	5.76
Total	0.13	0.07	1.15	0.49	0.01	0.09	—	0.09	0.09	—	0.09	—	1,326	1,326	0.12	< 0.005	—	1,330

### 4.3. Area Emissions by Source

#### 4.3.2. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Source	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hearths	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00
Consumer Products	—	11.1	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	—	3.97	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	5.29	5.01	0.54	55.0	< 0.005	0.03	—	0.03	0.02	—	0.02	—	148	148	0.01	< 0.005	—	149
Total	5.29	20.0	0.54	55.0	< 0.005	0.03	—	0.03	0.02	—	0.02	0.00	148	148	0.01	< 0.005	—	149
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hearths	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00
Consumer Products	—	11.1	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—



Architectural Coatings	—	3.97	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	0.00	15.0	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hearths	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00
Consumer Products	—	2.02	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	—	0.72	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.48	0.45	0.05	4.95	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	12.1	12.1	< 0.005	< 0.005	—	12.2
Total	0.48	3.19	0.05	4.95	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	0.00	12.1	12.1	< 0.005	< 0.005	—	12.2

#### 4.4. Water Emissions by Land Use

##### 4.4.2. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Condo/Townhouse	—	—	—	—	—	—	—	—	—	—	—	55.5	105	160	5.71	0.14	—	344
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	2.39	4.52	6.91	0.25	0.01	—	14.8
Total	—	—	—	—	—	—	—	—	—	—	—	57.9	109	167	5.96	0.14	—	359

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Condo/Townhouse	—	—	—	—	—	—	—	—	—	—	—	55.5	105	160	5.71	0.14	—	344
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	2.39	4.52	6.91	0.25	0.01	—	14.8
Total	—	—	—	—	—	—	—	—	—	—	—	57.9	109	167	5.96	0.14	—	359
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Condo/Townhouse	—	—	—	—	—	—	—	—	—	—	—	9.19	17.4	26.6	0.95	0.02	—	57.0
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	0.40	0.75	1.14	0.04	< 0.005	—	2.45
Total	—	—	—	—	—	—	—	—	—	—	—	9.59	18.1	27.7	0.99	0.02	—	59.4

## 4.5. Waste Emissions by Land Use

### 4.5.2. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e	
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Condo/Townhouse	—	—	—	—	—	—	—	—	—	—	—	382	0.00	382	38.2	0.00	—	—	1,337
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	9.54	0.00	9.54	0.95	0.00	—	—	33.4
Total	—	—	—	—	—	—	—	—	—	—	—	392	0.00	392	39.2	0.00	—	—	1,371
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Condo/T	—	—	—	—	—	—	—	—	—	—	—	382	0.00	382	38.2	0.00	—	1,337
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	9.54	0.00	9.54	0.95	0.00	—	33.4
Total	—	—	—	—	—	—	—	—	—	—	—	392	0.00	392	39.2	0.00	—	1,371
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Condo/T ownhous e	—	—	—	—	—	—	—	—	—	—	—	63.3	0.00	63.3	6.33	0.00	—	221
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	1.58	0.00	1.58	0.16	0.00	—	5.52
Total	—	—	—	—	—	—	—	—	—	—	—	64.9	0.00	64.9	6.48	0.00	—	227

## 4.6. Refrigerant Emissions by Land Use

### 4.6.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Condo/T ownhous e	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	7.28	7.28
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.10	0.10
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	7.39	7.39
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Condo/T ownhous e	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	7.28	7.28
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.10	0.10
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	7.39	7.39

Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	
Condo/Townhouse	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1.21	1.21
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.02	0.02
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1.22	1.22

### 4.7. Offroad Emissions By Equipment Type

#### 4.7.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

### 4.8. Stationary Emissions By Equipment Type

#### 4.8.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

#### 4.9. User Defined Emissions By Equipment Type

##### 4.9.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

### 4.10. Soil Carbon Accumulation By Vegetation Type

#### 4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Vegetation	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

#### 4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Species	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Sequest	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Remove d	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

## 5. Activity Data

### 5.1. Construction Schedule

Phase Name	Phase Type	Start Date	End Date	Days Per Week	Work Days per Phase	Phase Description
Site Preparation	Site Preparation	4/9/2024	6/4/2024	5.00	40.0	—
Grading	Grading	6/5/2024	11/6/2024	5.00	110	—
Building Construction	Building Construction	11/7/2024	2/8/2029	5.00	1,110	—
Paving	Paving	2/9/2029	5/25/2029	5.00	75.0	—
Architectural Coating	Architectural Coating	5/26/2029	9/8/2029	5.00	75.0	—

### 5.2. Off-Road Equipment

#### 5.2.1. Unmitigated

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
Site Preparation	Rubber Tired Dozers	Diesel	Average	3.00	8.00	367	0.40
Site Preparation	Tractors/Loaders/Backhoes	Diesel	Average	4.00	8.00	84.0	0.37
Grading	Graders	Diesel	Average	1.00	8.00	148	0.41
Grading	Excavators	Diesel	Average	2.00	8.00	36.0	0.38
Grading	Tractors/Loaders/Backhoes	Diesel	Average	2.00	8.00	84.0	0.37



Grading	Scrapers	Diesel	Average	2.00	8.00	423	0.48
Grading	Rubber Tired Dozers	Diesel	Average	1.00	8.00	367	0.40
Building Construction	Forklifts	Diesel	Average	3.00	8.00	82.0	0.20
Building Construction	Generator Sets	Diesel	Average	1.00	8.00	14.0	0.74
Building Construction	Cranes	Diesel	Average	1.00	7.00	367	0.29
Building Construction	Welders	Diesel	Average	1.00	8.00	46.0	0.45
Building Construction	Tractors/Loaders/Backhoes	Diesel	Average	3.00	7.00	84.0	0.37
Paving	Pavers	Diesel	Average	2.00	8.00	81.0	0.42
Paving	Paving Equipment	Diesel	Average	2.00	8.00	89.0	0.36
Paving	Rollers	Diesel	Average	2.00	8.00	36.0	0.38
Architectural Coating	Air Compressors	Diesel	Average	1.00	6.00	37.0	0.48

### 5.3. Construction Vehicles

#### 5.3.1. Unmitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Site Preparation	—	—	—	—
Site Preparation	Worker	17.5	11.7	LDA,LDT1,LDT2
Site Preparation	Vendor	—	8.40	HHDT,MHDT
Site Preparation	Hauling	0.00	20.0	HHDT
Site Preparation	Onsite truck	—	—	HHDT
Grading	—	—	—	—
Grading	Worker	20.0	11.7	LDA,LDT1,LDT2
Grading	Vendor	—	8.40	HHDT,MHDT
Grading	Hauling	0.00	20.0	HHDT
Grading	Onsite truck	—	—	HHDT
Building Construction	—	—	—	—

Building Construction	Worker	696	11.7	LDA,LDT1,LDT2
Building Construction	Vendor	105	8.40	HHDT,MHDT
Building Construction	Hauling	0.00	20.0	HHDT
Building Construction	Onsite truck	—	—	HHDT
Paving	—	—	—	—
Paving	Worker	15.0	11.7	LDA,LDT1,LDT2
Paving	Vendor	—	8.40	HHDT,MHDT
Paving	Hauling	0.00	20.0	HHDT
Paving	Onsite truck	—	—	HHDT
Architectural Coating	—	—	—	—
Architectural Coating	Worker	139	11.7	LDA,LDT1,LDT2
Architectural Coating	Vendor	—	8.40	HHDT,MHDT
Architectural Coating	Hauling	0.00	20.0	HHDT
Architectural Coating	Onsite truck	—	—	HHDT

## 5.4. Vehicles

### 5.4.1. Construction Vehicle Control Strategies

Non-applicable. No control strategies activated by user.

## 5.5. Architectural Coatings

Phase Name	Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
Architectural Coating	2,058,494	686,165	25,278	8,426	—

## 5.6. Dust Mitigation

### 5.6.1. Construction Earthmoving Activities

Phase Name	Material Imported (Ton of Debris)	Material Exported (Ton of Debris)	Acres Graded (acres)	Material Demolished (sq. ft.)	Acres Paved (acres)
Site Preparation	0.00	0.00	60.0	0.00	—
Grading	0.00	0.00	330	0.00	—
Paving	0.00	0.00	0.00	0.00	0.00

### 5.6.2. Construction Earthmoving Control Strategies

Non-applicable. No control strategies activated by user.

### 5.7. Construction Paving

Land Use	Area Paved (acres)	% Asphalt
Condo/Townhouse	—	0%
Strip Mall	0.00	0%

### 5.8. Construction Electricity Consumption and Emissions Factors

#### kWh per Year and Emission Factor (lb/MWh)

Year	kWh per Year	CO2	CH4	N2O
2024	0.00	204	0.03	< 0.005
2025	0.00	204	0.03	< 0.005
2026	0.00	204	0.03	< 0.005
2027	0.00	204	0.03	< 0.005
2028	0.00	204	0.03	< 0.005
2029	0.00	204	0.03	< 0.005

### 5.9. Operational Mobile Sources

#### 5.9.1. Unmitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VMT/Weekday	VMT/Saturday	VMT/Sunday	VMT/Year
Condo/Townhouse	7,020	7,806	6,023	2,551,255	69,037	76,770	59,228	25,090,192
Strip Mall	747	708	344	249,616	9,925	9,414	4,575	3,316,914

## 5.10. Operational Area Sources

### 5.10.1. Hearths

#### 5.10.1.1. Unmitigated

Hearth Type	Unmitigated (number)
Condo/Townhouse	—
Wood Fireplaces	0
Gas Fireplaces	0
Propane Fireplaces	0
Electric Fireplaces	0
No Fireplaces	959
Conventional Wood Stoves	0
Catalytic Wood Stoves	0
Non-Catalytic Wood Stoves	0
Pellet Wood Stoves	0

### 5.10.2. Architectural Coatings

Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
2058493.5	686,165	25,278	8,426	—

### 5.10.3. Landscape Equipment

Season	Unit	Value
Snow Days	day/yr	0.00
Summer Days	day/yr	180

## 5.11. Operational Energy Consumption

### 5.11.1. Unmitigated

#### Electricity (kWh/yr) and CO2 and CH4 and N2O and Natural Gas (kBTU/yr)

Land Use	Electricity (kWh/yr)	CO2	CH4	N2O	Natural Gas (kBTU/yr)
Condo/Townhouse	3,968,860	204	0.0330	0.0040	24,879,391
Strip Mall	140,685	204	0.0330	0.0040	108,286

## 5.12. Operational Water and Wastewater Consumption

### 5.12.1. Unmitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
Condo/Townhouse	28,982,898	0.00
Strip Mall	1,248,270	0.00

## 5.13. Operational Waste Generation

### 5.13.1. Unmitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
Condo/Townhouse	709	—
Strip Mall	17.7	—

## 5.14. Operational Refrigeration and Air Conditioning Equipment

### 5.14.1. Unmitigated

Land Use Type	Equipment Type	Refrigerant	GWP	Quantity (kg)	Operations Leak Rate	Service Leak Rate	Times Serviced
Condo/Townhouse	Average room A/C & Other residential A/C and heat pumps	R-410A	2,088	< 0.005	2.50	2.50	10.0
Condo/Townhouse	Household refrigerators and/or freezers	R-134a	1,430	0.12	0.60	0.00	1.00
Strip Mall	Other commercial A/C and heat pumps	R-410A	2,088	< 0.005	4.00	4.00	18.0
Strip Mall	Stand-alone retail refrigerators and freezers	R-134a	1,430	0.04	1.00	0.00	1.00
Strip Mall	Walk-in refrigerators and freezers	R-404A	3,922	< 0.005	7.50	7.50	20.0

### 5.15. Operational Off-Road Equipment

#### 5.15.1. Unmitigated

Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
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### 5.16. Stationary Sources

#### 5.16.1. Emergency Generators and Fire Pumps

Equipment Type	Fuel Type	Number per Day	Hours per Day	Hours per Year	Horsepower	Load Factor
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#### 5.16.2. Process Boilers

Equipment Type	Fuel Type	Number	Boiler Rating (MMBtu/hr)	Daily Heat Input (MMBtu/day)	Annual Heat Input (MMBtu/yr)
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### 5.17. User Defined

Equipment Type	Fuel Type
—	—

### 5.18. Vegetation

#### 5.18.1. Land Use Change

##### 5.18.1.1. Unmitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres
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#### 5.18.1. Biomass Cover Type

##### 5.18.1.1. Unmitigated

Biomass Cover Type	Initial Acres	Final Acres
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#### 5.18.2. Sequestration

##### 5.18.2.1. Unmitigated

Tree Type	Number	Electricity Saved (kWh/year)	Natural Gas Saved (btu/year)
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## 6. Climate Risk Detailed Report

### 6.1. Climate Risk Summary

Cal-Adapt midcentury 2040–2059 average projections for four hazards are reported below for your project location. These are under Representation Concentration Pathway (RCP) 8.5 which assumes GHG emissions will continue to rise strongly through 2050 and then plateau around 2100.

Climate Hazard	Result for Project Location	Unit
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Temperature and Extreme Heat	7.19	annual days of extreme heat
Extreme Precipitation	8.75	annual days with precipitation above 20 mm
Sea Level Rise	0.00	meters of inundation depth
Wildfire	6.01	annual hectares burned

Temperature and Extreme Heat data are for grid cell in which your project are located. The projection is based on the 98th historical percentile of daily maximum/minimum temperatures from observed historical data (32 climate model ensemble from Cal-Adapt, 2040–2059 average under RCP 8.5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

Extreme Precipitation data are for the grid cell in which your project are located. The threshold of 20 mm is equivalent to about ¾ an inch of rain, which would be light to moderate rainfall if received over a full day or heavy rain if received over a period of 2 to 4 hours. Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

Sea Level Rise data are for the grid cell in which your project are located. The projections are from Radke et al. (2017), as reported in Cal-Adapt (2040–2059 average under RCP 8.5), and consider different increments of sea level rise coupled with extreme storm events. Users may select from four model simulations to view the range in potential inundation depth for the grid cell. The four simulations make different assumptions about expected rainfall and temperature are: Warmer/drier (HadGEM2-ES), Cooler/wetter (CNRM-CM5), Average conditions (CanESM2), Range of different rainfall and temperature possibilities (MIROC5). Each grid cell is 50 meters (m) by 50 m, or about 164 feet (ft) by 164 ft.

Wildfire data are for the grid cell in which your project are located. The projections are from UC Davis, as reported in Cal-Adapt (2040–2059 average under RCP 8.5), and consider historical data of climate, vegetation, population density, and large (> 400 ha) fire history. Users may select from four model simulations to view the range in potential wildfire probabilities for the grid cell. The four simulations make different assumptions about expected rainfall and temperature are: Warmer/drier (HadGEM2-ES), Cooler/wetter (CNRM-CM5), Average conditions (CanESM2), Range of different rainfall and temperature possibilities (MIROC5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

## 6.2. Initial Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	N/A	N/A	N/A	N/A
Extreme Precipitation	3	0	0	N/A
Sea Level Rise	1	0	0	N/A
Wildfire	1	0	0	N/A
Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	0	0	0	N/A

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.

The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.

The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores do not include implementation of climate risk reduction measures.



### 6.3. Adjusted Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	N/A	N/A	N/A	N/A
Extreme Precipitation	3	1	1	3
Sea Level Rise	1	1	1	2
Wildfire	1	1	1	2
Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	1	1	1	2

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.

The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.

The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores include implementation of climate risk reduction measures.

### 6.4. Climate Risk Reduction Measures

## 7. Health and Equity Details

### 7.1. CalEnviroScreen 4.0 Scores

The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Exposure Indicators	—
AQ-Ozone	3.83
AQ-PM	25.3
AQ-DPM	59.8
Drinking Water	7.43
Lead Risk Housing	32.8

Pesticides	0.00
Toxic Releases	58.5
Traffic	98.4
Effect Indicators	—
CleanUp Sites	78.0
Groundwater	44.3
Haz Waste Facilities/Generators	72.6
Impaired Water Bodies	90.1
Solid Waste	52.9
Sensitive Population	—
Asthma	32.0
Cardio-vascular	22.9
Low Birth Weights	11.2
Socioeconomic Factor Indicators	—
Education	2.71
Housing	33.7
Linguistic	12.3
Poverty	17.2
Unemployment	9.72

## 7.2. Healthy Places Index Scores

The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Economic	—
Above Poverty	89.33658411
Employed	99.0632619
Median HI	90.77377133

Education	—
Bachelor's or higher	96.99730527
High school enrollment	100
Preschool enrollment	95.7141024
Transportation	—
Auto Access	42.10188631
Active commuting	90.46580264
Social	—
2-parent households	89.58039266
Voting	98.20351598
Neighborhood	—
Alcohol availability	12.98601309
Park access	81.35506224
Retail density	90.87642756
Supermarket access	72.34697806
Tree canopy	96.61234441
Housing	—
Homeownership	37.0973951
Housing habitability	60.43885538
Low-inc homeowner severe housing cost burden	54.20248941
Low-inc renter severe housing cost burden	66.84203773
Uncrowded housing	89.4649044
Health Outcomes	—
Insured adults	87.48877197
Arthritis	0.0
Asthma ER Admissions	59.1
High Blood Pressure	0.0

Cancer (excluding skin)	0.0
Asthma	0.0
Coronary Heart Disease	0.0
Chronic Obstructive Pulmonary Disease	0.0
Diagnosed Diabetes	0.0
Life Expectancy at Birth	92.9
Cognitively Disabled	92.5
Physically Disabled	86.7
Heart Attack ER Admissions	87.9
Mental Health Not Good	0.0
Chronic Kidney Disease	0.0
Obesity	0.0
Pedestrian Injuries	76.1
Physical Health Not Good	0.0
Stroke	0.0
Health Risk Behaviors	—
Binge Drinking	0.0
Current Smoker	0.0
No Leisure Time for Physical Activity	0.0
Climate Change Exposures	—
Wildfire Risk	0.2
SLR Inundation Area	26.0
Children	78.7
Elderly	8.7
English Speaking	75.0
Foreign-born	21.6
Outdoor Workers	89.7

Climate Change Adaptive Capacity	—
Impervious Surface Cover	63.0
Traffic Density	81.2
Traffic Access	52.9
Other Indices	—
Hardship	2.2
Other Decision Support	—
2016 Voting	97.4

### 7.3. Overall Health & Equity Scores

Metric	Result for Project Census Tract
CalEnviroScreen 4.0 Score for Project Location (a)	15.0
Healthy Places Index Score for Project Location (b)	99.0
Project Located in a Designated Disadvantaged Community (Senate Bill 535)	No
Project Located in a Low-Income Community (Assembly Bill 1550)	No
Project Located in a Community Air Protection Program Community (Assembly Bill 617)	No

a: The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.

b: The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

### 7.4. Health & Equity Measures

No Health & Equity Measures selected.

### 7.5. Evaluation Scorecard

Health & Equity Evaluation Scorecard not completed.

### 7.6. Health & Equity Custom Measures

No Health & Equity Custom Measures created.

## 8. User Changes to Default Data

Screen	Justification
Construction: Construction Phases	No demolition.
Operations: Hearths	No hearths
Operations: Consumer Products	<p>Revised General Category consumer products emissions factor to reflect CARB adjustments applied to their Consumer and Commercial Product Survey Emission data, made after the 2008 consumer products emissions factor. Adjustment made to reflect average adjustment factor. See for further detail:</p> <p><a href="https://ww2.arb.ca.gov/our-work/programs/consumer-products-program/consumer-products-emissions-inventory">https://ww2.arb.ca.gov/our-work/programs/consumer-products-program/consumer-products-emissions-inventory</a></p>

# **APPENDIX C**

## **Cultural and Tribal Cultural Resources Data**

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## **APPENDIX C.1**

Native American Heritage Commission (NAHC) Letter



# NATIVE AMERICAN HERITAGE COMMISSION

May 25, 2023

Governor's Office of Planning & Research

**MAY 31 2023**

Brandon Phipps  
City of Sausalito  
420 Litho St.  
Sausalito, CA 94965

## STATE CLEARINGHOUSE

**Re: 2023050516, City of Sausalito 6th Cycle Housing Element Programs, Marin County**

Dear Mr. Phipps:

The Native American Heritage Commission (NAHC) has received the Notice of Preparation (NOP), Draft Environmental Impact Report (DEIR) or Early Consultation for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code §21000 et seq.), specifically Public Resources Code §21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource, is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit.14, § 15064.5 (b) (CEQA Guidelines §15064.5 (b))). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an Environmental Impact Report (EIR) shall be prepared. (Pub. Resources Code §21080 (d); Cal. Code Regs., tit. 14, § 5064 subd.(a)(1) (CEQA Guidelines § 15064 (a)(1))). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources within the area of potential effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, "tribal cultural resources" (Pub. Resources Code §21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. (Pub. Resources Code §21084.2). Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code §21084.3 (a)). **AB 52 applies to any project for which a notice of preparation, a notice of negative declaration, or a mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements.** If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. §800 et seq.) may also apply.

The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments.

**Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.**

AB 52



ACTING CHAIRPERSON  
**Reginald Pagaling**  
Chumash

SECRETARY  
**Sara Dutschke**  
Miwok

COMMISSIONER  
**Isaac Bojorquez**  
Ohlone-Costanoan

COMMISSIONER  
**Buffy McQuillen**  
Yokayo Pomo, Yuki,  
Nomlaki

COMMISSIONER  
**Wayne Nelson**  
Luiseño

COMMISSIONER  
**Stanley Rodriguez**  
Kumeyaay

COMMISSIONER  
**Vacant**

COMMISSIONER  
**Vacant**

COMMISSIONER  
**Vacant**

EXECUTIVE SECRETARY  
**Raymond C. Hitchcock**  
Miwok, Nisenan

**NAHC HEADQUARTERS**  
1550 Harbor Boulevard  
Suite 100  
West Sacramento,  
California 95691  
(916) 373-3710  
[nahc@nahc.ca.gov](mailto:nahc@nahc.ca.gov)  
[NAHC.ca.gov](http://NAHC.ca.gov)

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

**1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project:**

Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:

- a. A brief description of the project.
- b. The lead agency contact information.
- c. Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code §21080.3.1 (d)).
- d. A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code §21073).

**2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report:** A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code §21080.3.1, subs. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or Environmental Impact Report. (Pub. Resources Code §21080.3.1 (b)).

- a. For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code §65352.4 (SB 18). (Pub. Resources Code §21080.3.1 (b)).

**3. Mandatory Topics of Consultation If Requested by a Tribe:** The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:

- a. Alternatives to the project.
- b. Recommended mitigation measures.
- c. Significant effects. (Pub. Resources Code §21080.3.2 (a)).

**4. Discretionary Topics of Consultation:** The following topics are discretionary topics of consultation:

- a. Type of environmental review necessary.
- b. Significance of the tribal cultural resources.
- c. Significance of the project's impacts on tribal cultural resources.
- d. If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code §21080.3.2 (a)).

**5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process:** With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code §6254 (r) and §6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code §21082.3 (c)(1)).

**6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document:** If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:

- a. Whether the proposed project has a significant impact on an identified tribal cultural resource.
- b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code §21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code §21082.3 (b)).

- 7. Conclusion of Consultation:** Consultation with a tribe shall be considered concluded when either of the following occurs:
- a.** The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
  - b.** A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code §21080.3.2 (b)).
- 8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document:** Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code §21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code §21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code §21082.3 (a)).
- 9. Required Consideration of Feasible Mitigation:** If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code §21084.3 (b). (Pub. Resources Code §21082.3 (e)).
- 10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:**
- a.** Avoidance and preservation of the resources in place, including, but not limited to:
    - i.** Planning and construction to avoid the resources and protect the cultural and natural context.
    - ii.** Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
  - b.** Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
    - i.** Protecting the cultural character and integrity of the resource.
    - ii.** Protecting the traditional use of the resource.
    - iii.** Protecting the confidentiality of the resource.
  - c.** Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
  - d.** Protecting the resource. (Pub. Resource Code §21084.3 (b)).
  - e.** Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code §815.3 (c)).
  - f.** Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code §5097.991).
- 11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource:** An Environmental Impact Report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:
- a.** The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code §21080.3.1 and §21080.3.2 and concluded pursuant to Public Resources Code §21080.3.2.
  - b.** The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
  - c.** The lead agency provided notice of the project to the tribe in compliance with Public Resources Code §21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code §21082.3 (d)).

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: [http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation\\_CalEPAPDF.pdf](http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf)

## SB 18

SB 18 applies to local governments and requires local governments to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code §65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: [https://www.opr.ca.gov/docs/09\\_14\\_05\\_Updated\\_Guidelines\\_922.pdf](https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf).

Some of SB 18's provisions include:

1. **Tribal Consultation**: If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code §65352.3 (a)(2)).
2. **No Statutory Time Limit on SB 18 Tribal Consultation**. There is no statutory time limit on SB 18 tribal consultation.
3. **Confidentiality**: Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code §65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code §5097.9 and §5097.993 that are within the city's or county's jurisdiction. (Gov. Code §65352.3 (b)).
4. **Conclusion of SB 18 Tribal Consultation**: Consultation should be concluded at the point in which:
  - a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
  - b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: <http://nahc.ca.gov/resources/forms/>.

### NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center ([https://ohp.parks.ca.gov/?page\\_id=30331](https://ohp.parks.ca.gov/?page_id=30331)) for an archaeological records search. The records search will determine:
  - a. If part or all of the APE has been previously surveyed for cultural resources.
  - b. If any known cultural resources have already been recorded on or adjacent to the APE.
  - c. If the probability is low, moderate, or high that cultural resources are located in the APE.
  - d. If a survey is required to determine whether previously unrecorded cultural resources are present.
2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
  - a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.
  - b. The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.

3. Contact the NAHC for:
  - a. A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
  - b. A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.
  
4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.
  - a. Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, § 15064.5(f) (CEQA Guidelines § 15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
  - b. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
  - c. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code § 7050.5, Public Resources Code § 5097.98, and Cal. Code Regs., tit. 14, § 15064.5, subdivisions (d) and (e) (CEQA Guidelines § 15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

If you have any questions or need additional information, please contact me at my email address:  
[Cody.Campagne@nahc.ca.gov](mailto:Cody.Campagne@nahc.ca.gov)

Sincerely,

*Cody Campagne*

Cody Campagne  
Cultural Resources Analyst

cc: State Clearinghouse

## **APPENDIX C.2**

Tribal Consultation Letters



## Senate Bill 18 Tribal Consultation CITY OF SAUSALITO HOUSING ELEMENT PROGRAMS ENVIRONMENTAL IMPACT REPORT

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July 28, 2023

Wuksache Indian Tribe/Eshom Valley Band  
Kenneth Woodrow  
1179 Rock Haven Ct  
Salinas, CA 93906  
*Sent via email:* kwood8934@aol.com

**Subject:** City of Sausalito Housing Element Programs Draft Environmental Impact Report

Dear Tribal Representative,

The City of Sausalito (City) recently updated their Housing Element consistent with the requirements of State law to address housing. As a result, the City is currently taking steps to implement Housing Element Programs to accommodate actions necessary to ensure the City's sites inventory accommodates the Regional Housing Needs Assessment (RHNA) requirements for the 6th Cycle Housing Element Planning Period. The City is reaching out to individuals and organizations listed with the Native American Heritage Commission (NAHC) who may wish to engage in consultation with the City pursuant to SB 18.

### Government Code Sections 65352 and 65352.3 (SB 18)

The California Government Code establishes responsibilities for local governments to contact, provide notice to, refer plans to, and consult with tribes. The following list briefly identifies the contact and notification responsibilities of local governments, in sequential order of their occurrence.

- Prior to the adoption or any amendment of a general plan or specific plan, a local government must notify the appropriate tribes (on the contact list maintained by the NAHC) of the opportunity to conduct consultations for the purpose of preserving, or mitigating impacts to, cultural places located on land within the local government's jurisdiction that is affected by the proposed plan adoption or amendment.
- Prior to the adoption or substantial amendment of a general plan or specific plan, a local government must refer the proposed action to those tribes that are on the NAHC contact list and have traditional lands located within the city or county's jurisdiction. Notice must be sent regardless of whether prior consultation has taken place. Such notice does not initiate a new consultation process.

Below please find a description of the proposed project, a map showing the project location, and the name of our project point of contact, pursuant to PRC §21080.3.1(d).

### Project Description

The City of Sausalito (City) is preparing a Program Environmental Impact Report (EIR) for the proposed Housing Element Programs project (proposed project). The EIR will analyze potentially significant impacts associated with adoption and implementation of the proposed project.

The Housing Element is a planning document that identifies how the City would accommodate development of 724 total housing units that were included in the City's 6th Cycle Regional Housing Needs Allocation (RHNA), which are greater than the 5th Cycle RHNA of 79 units. This is due in part to the Bay Area region's overall allocation of 441,176 units from State Department of Housing and Community Development (HCD) being more than double the last Housing Element cycle's allocation, which was approximately 189,000 units. However, the City's adoption of the Housing Element did not implement specific changes to existing land use controls (e.g., zoning) or approve any physical development (e.g., construction of housing or infrastructure) that may be necessary to accommodate such development. As such, the adoption of the Housing Element did not result in any direct physical changes to the environment.

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Please consider this letter notification as the initiation of the SB 18 process. Pursuant to Government Code Section 65352.3, your organization has 90 days upon receipt of this letter to provide a request for SB 18 consultation. The City, however, would appreciate receiving comments on or before August 31, 2023 to inform the process and provide for incorporation of comments into the Housing Element Programs environmental documentation. If you have any questions, or would like to set up a consultation, please contact me at [cerwin@denovoplanning.com](mailto:cerwin@denovoplanning.com) or Brandon Phipps, the City's Community and Economic Development Director, at [bhipps@sausalito.gov](mailto:bhipps@sausalito.gov) and provide the primary point of contact for the tribe. Additionally, a letter may be mailed to the City at:

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City of Sausalito Community Development Department  
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Sausalito, CA 94965  
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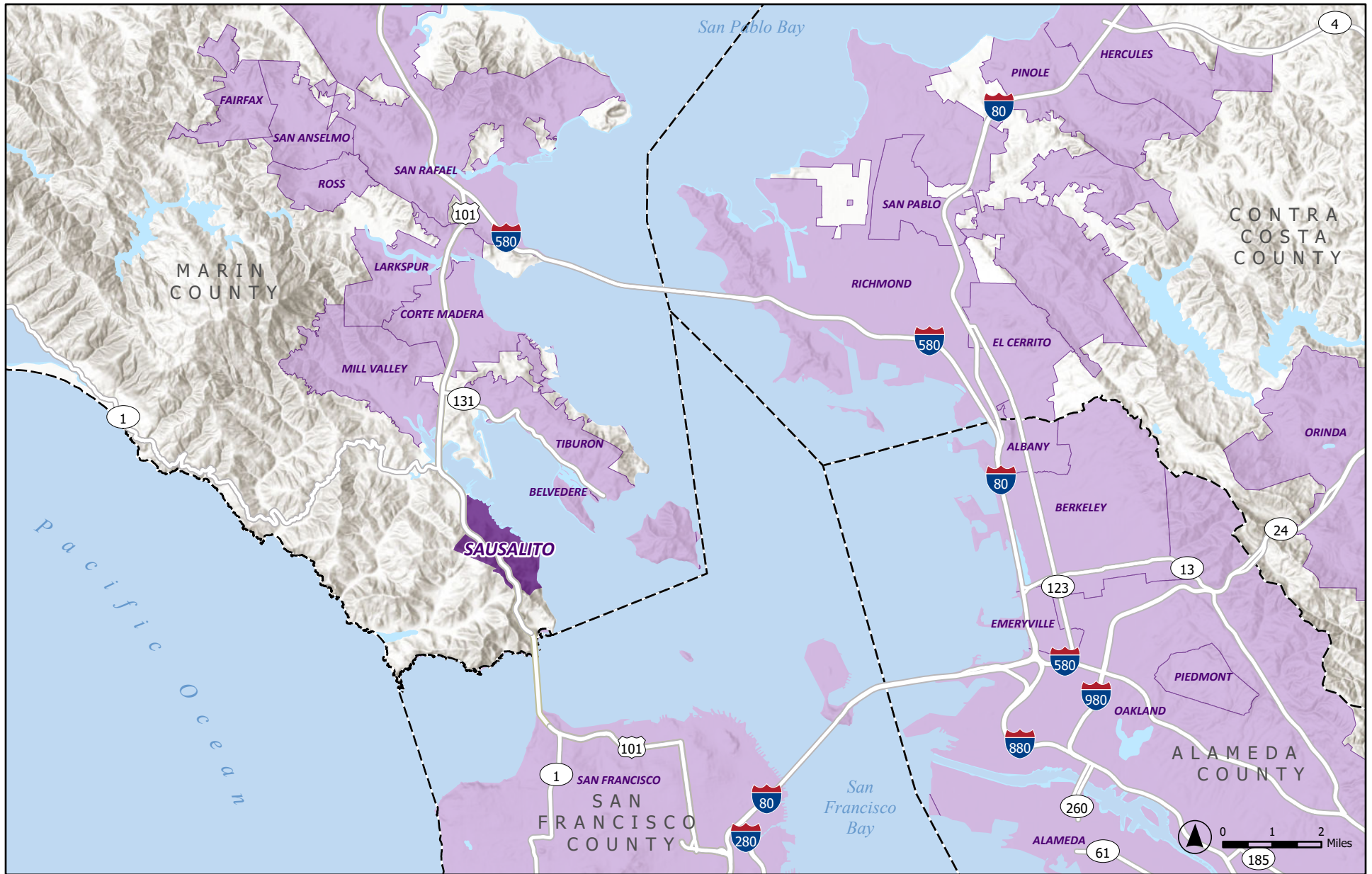
Sincerely,



Christina Erwin  
De Novo Planning Group

Attachments:

Figure 1, Regional Location Map  
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**LEGEND**

- City of Sausalito
- Other Incorporated Area
- County Boundary



**HOUSING ELEMENT PROGRAMS EIR**

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Sources: City of Sausalito; Marin GeoHub. Map date: July 19, 2023.

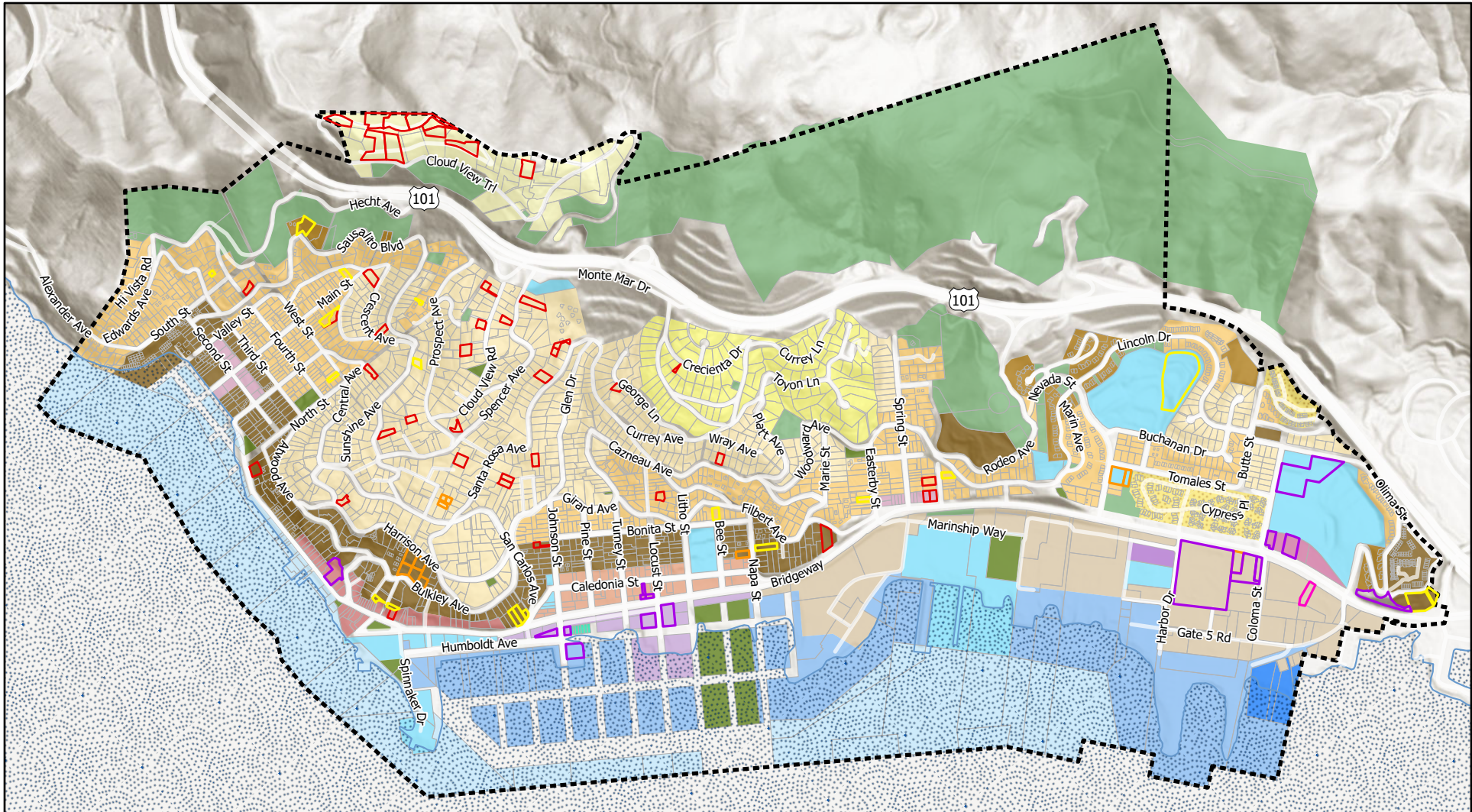


**LEGEND**

-  Sausalito City Boundary
-  Housing Element Programs Sites

**HOUSING ELEMENT PROGRAMS EIR**

Figure 2. Housing Element Program Sites



LEGEND	
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Housing-70	R-2-5: Two Family
MU-49/85%	R-3: Multiple Family
MU-70/85%	R-A: Arks
	PR: Planned Residential
	CC: Central Commercial
	CR: Commercial Residential
	CN-1: Neighborhood Commercial
	CN-2: Neighborhood Commercial
	CW: Commercial Waterfront
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	H: Houseboats
	I: Industrial
	W: Waterfront
	PI: Public Institutional
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	Sausalito City Boundary
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**HOUSING ELEMENT PROGRAMS EIR**  
**Figure 3. Proposed Zoning**

Sources: City of Sausalito; Marin GeoHub. Map date: July 18, 2023.



## Senate Bill 18 Tribal Consultation CITY OF SAUSALITO HOUSING ELEMENT PROGRAMS ENVIRONMENTAL IMPACT REPORT

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July 28, 2023

Guidiville Indian Rancheria  
Donald Duncan  
P.O. Box 339  
Talmage, CA 95481  
*Sent via email:* admin@guidiville.net

**Subject:** City of Sausalito Housing Element Programs Draft Environmental Impact Report

Dear Tribal Representative,

The City of Sausalito (City) recently updated their Housing Element consistent with the requirements of State law to address housing. As a result, the City is currently taking steps to implement Housing Element Programs to accommodate actions necessary to ensure the City's sites inventory accommodates the Regional Housing Needs Assessment (RHNA) requirements for the 6th Cycle Housing Element Planning Period. The City is reaching out to individuals and organizations listed with the Native American Heritage Commission (NAHC) who may wish to engage in consultation with the City pursuant to SB 18.

### Government Code Sections 65352 and 65352.3 (SB 18)

The California Government Code establishes responsibilities for local governments to contact, provide notice to, refer plans to, and consult with tribes. The following list briefly identifies the contact and notification responsibilities of local governments, in sequential order of their occurrence.

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Below please find a description of the proposed project, a map showing the project location, and the name of our project point of contact, pursuant to PRC §21080.3.1(d).

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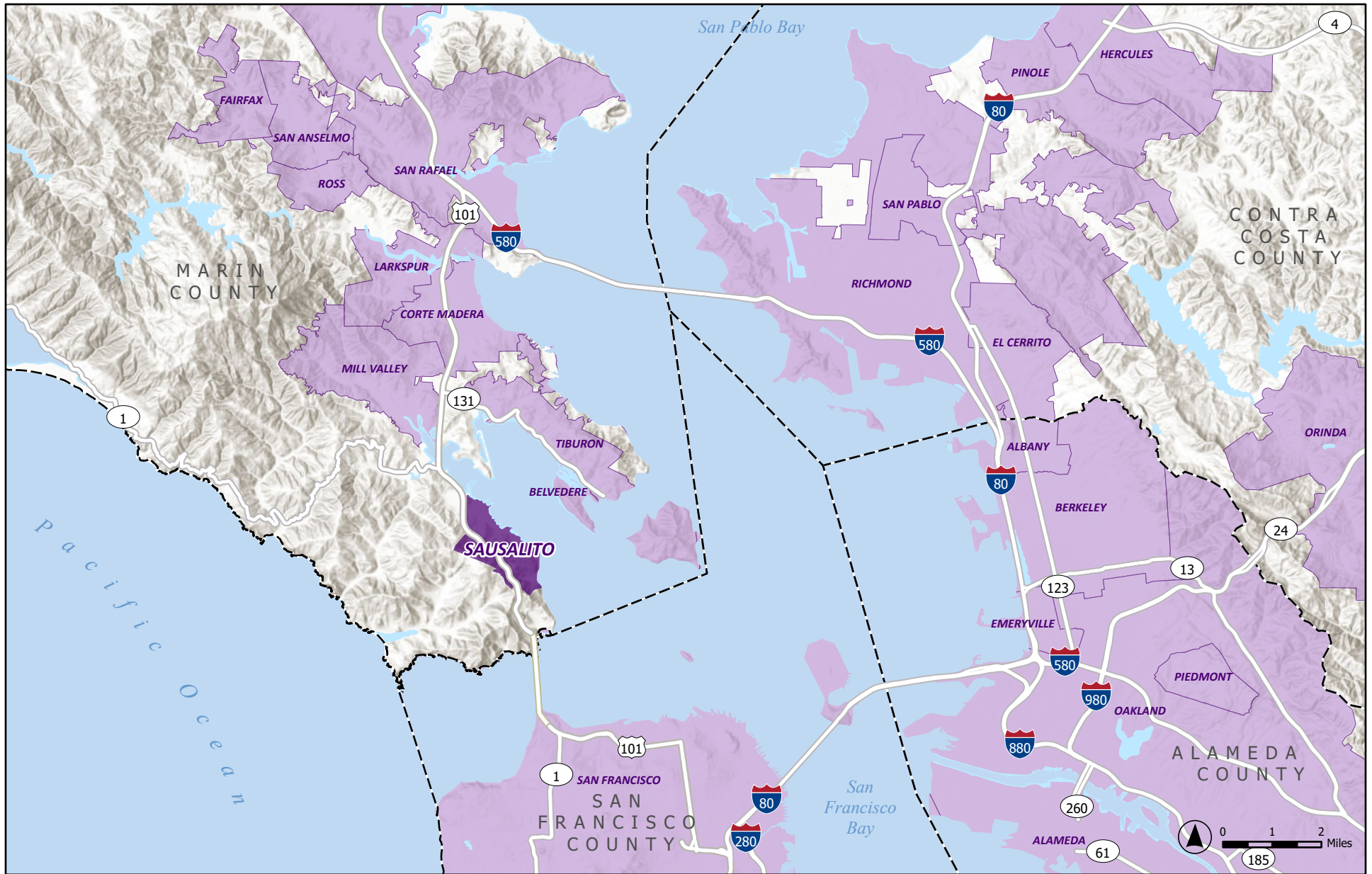
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**HOUSING ELEMENT PROGRAMS EIR**

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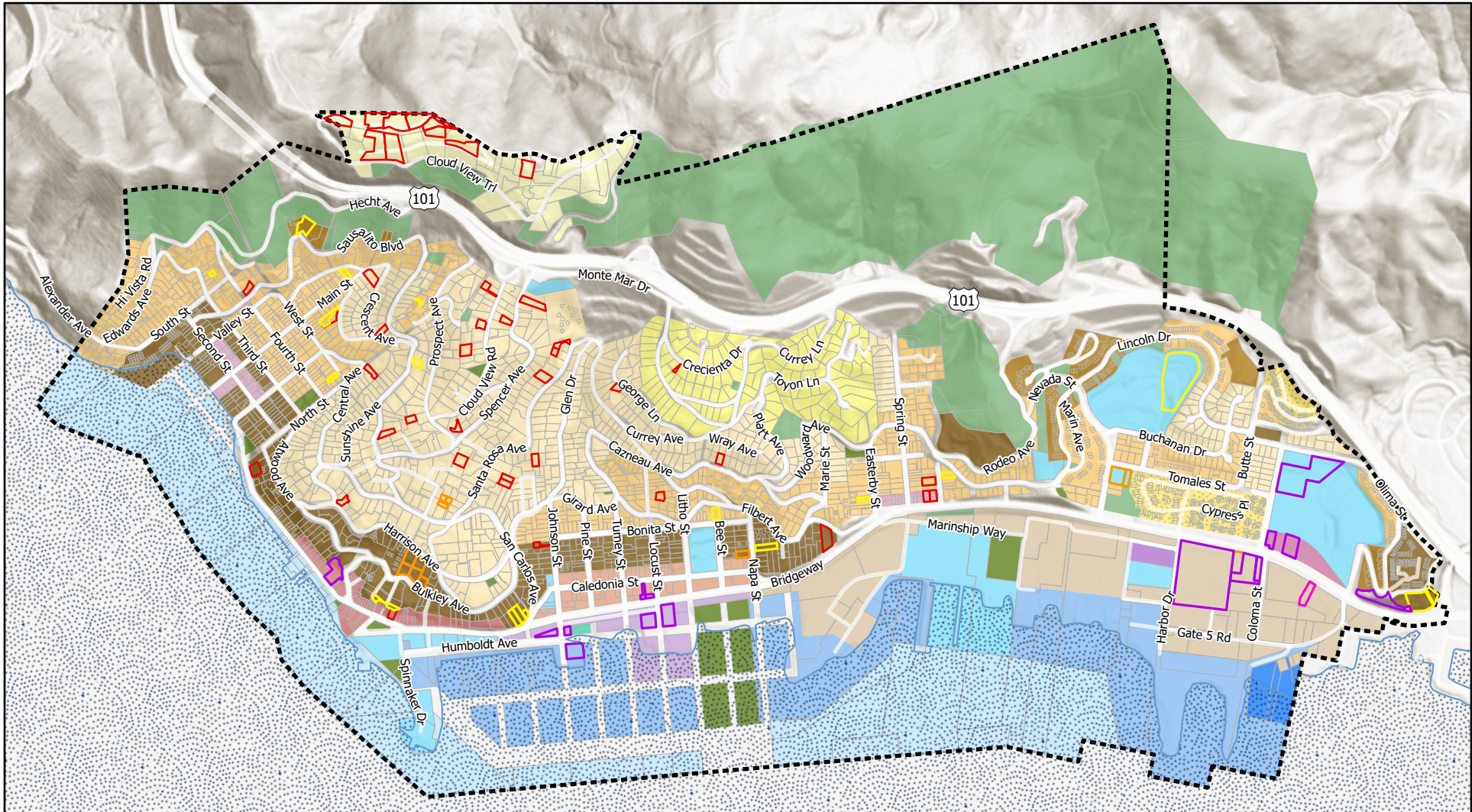


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## Senate Bill 18 Tribal Consultation CITY OF SAUSALITO HOUSING ELEMENT PROGRAMS PROGRAM ENVIRONMENTAL IMPACT REPORT

---

July 28, 2023

Federated Indians of Graton Rancheria  
Greg Sarris  
6400 Redwood Drive, Ste. 300  
Rohnert Park, CA 94928  
*Sent via email:* gbuvelot@gratonrancheria.com, gsarris@gratonrancheria.com

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The proposed project is located within the City of Sausalito. The City is located in southern Marin County. The 2.1-square mile City is located on the shores of Richardson Bay with a population of 7,114 people in 2020. The City is bound by San Francisco Bay (Richardson Bay) to the east, Golden Gate National Recreation Area to the west and south, and unincorporated Marin County, including the community of Marin City to the north and northwest. The proposed project focuses on actions and sites within the City limits and does not identify any sites for annexation.

For more information regarding the project, including the approved 6th Cycle Housing Element, please visit <https://housingelements Marin.org/city-of-sausalito> and refer to the attached Figure 1, Regional Location Map; Figure 2, Housing Element Programs Sites; and Figure 3, Proposed Zoning.

Please consider this letter notification as the initiation of the SB 18 process. Pursuant to Government Code Section 65352.3, your organization has 90 days upon receipt of this letter to provide a request for SB 18 consultation. The City, however, would appreciate receiving comments on or before August 31, 2023 to inform the process and provide for incorporation of comments into the Housing Element Programs environmental documentation. If you have any questions, or would like to set up a consultation, please contact me at [cerwin@denovoplanning.com](mailto:cerwin@denovoplanning.com) or Brandon Phipps, the City's Community and Economic Development Director, at [bhipps@sausalito.gov](mailto:bhipps@sausalito.gov) and provide the primary point of contact for the tribe. Additionally, a letter may be mailed to the City at:

Brandon Phipps, Community and Economic Development Director  
City of Sausalito Community Development Department  
420 Litho Street  
Sausalito, CA 94965  
[bhipps@sausalito.gov](mailto:bhipps@sausalito.gov)

Thank you for your time reviewing this letter.

Sincerely,

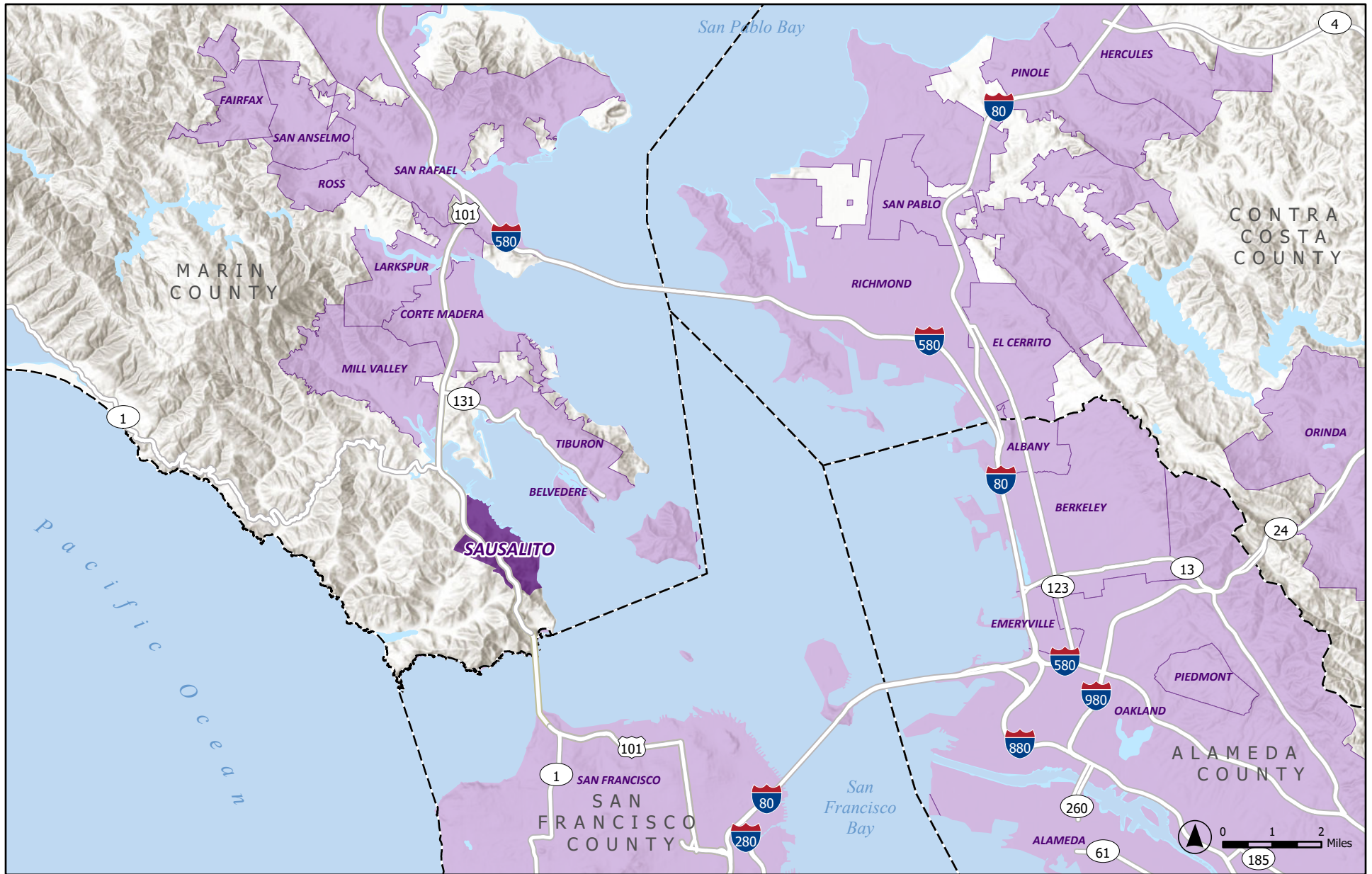


Christina Erwin  
De Novo Planning Group

Attachments:

- Figure 1, Regional Location Map
- Figure 2, Housing Element Programs Sites
- Figure 3, Proposed Zoning





**LEGEND**

- City of Sausalito
- Other Incorporated Area
- County Boundary



**HOUSING ELEMENT PROGRAMS EIR**

Figure 1. Regional Location Map

Sources: City of Sausalito; Marin GeoHub. Map date: July 19, 2023.

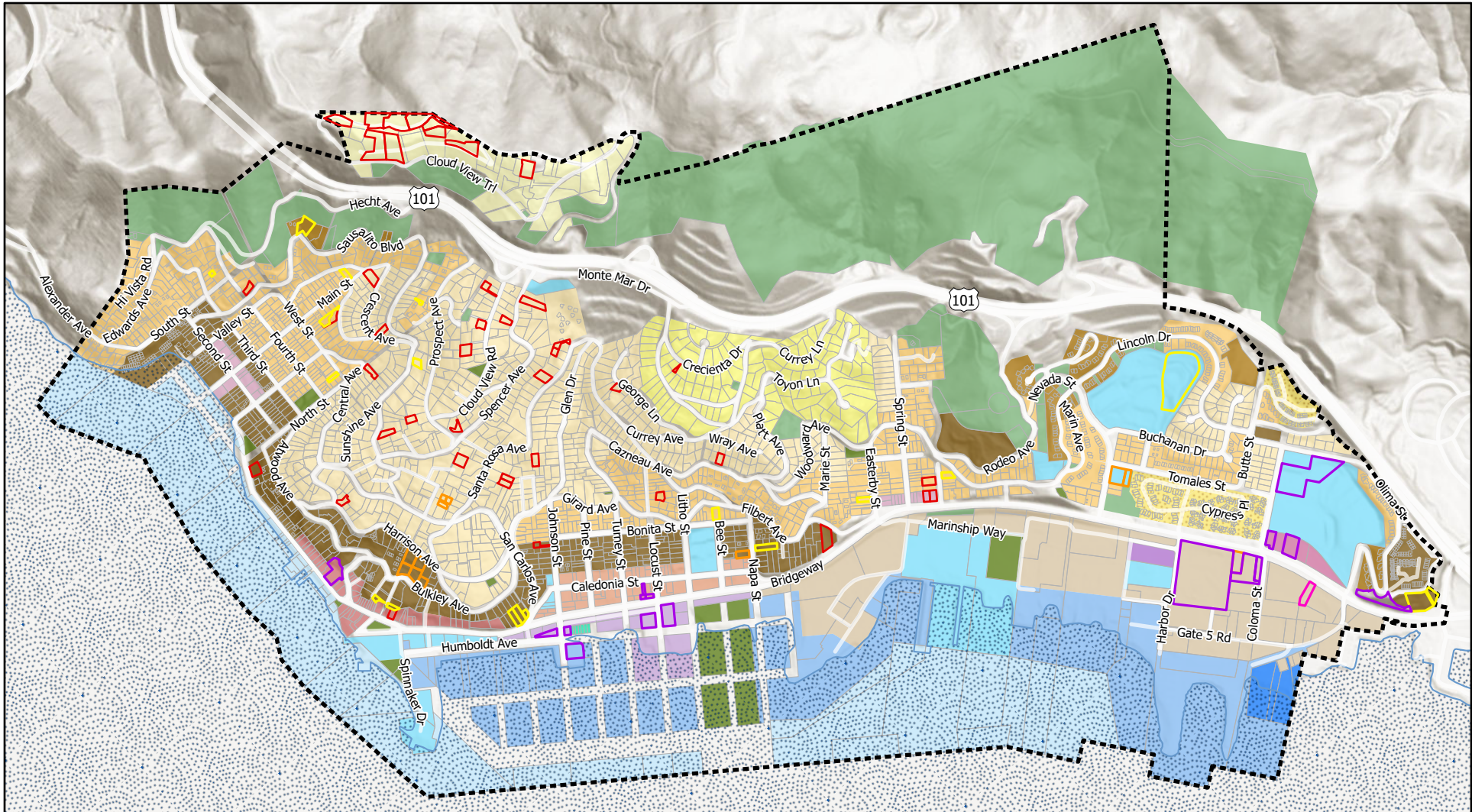


**LEGEND**

-  Sausalito City Boundary
-  Housing Element Programs Sites

**HOUSING ELEMENT PROGRAMS EIR**

Figure 2. Housing Element Program Sites



LEGEND	
<b>Housing Element Programs Sites</b>	<b>Zoning Designations</b>
Sites Retaining Existing Zoning	R-1-20: Single Family
Inventory Site	R-1-8: Single Family
Sites with New Housing Overlay	R-1-6: Single Family
Housing-49	R-2-2.5: Two Family
Housing-70	R-2-5: Two Family
MU-49/85%	R-3: Multiple Family
MU-70/85%	R-A: Arks
	PR: Planned Residential
	CC: Central Commercial
	CR: Commercial Residential
	CN-1: Neighborhood Commercial
	CN-2: Neighborhood Commercial
	CW: Commercial Waterfront
	CS: Shopping Center
	H: Houseboats
	I: Industrial
	W: Waterfront
	PI: Public Institutional
	PP: Public Parks
	OS: Open Space
	OA: Open Area
	Sausalito City Boundary
	Ocean/Bay/Coastline



**HOUSING ELEMENT PROGRAMS EIR**  
**Figure 3. Proposed Zoning**

Sources: City of Sausalito; Marin GeoHub. Map date: July 18, 2023.



Christina Erwin <cerwin@denovoplanning.com>

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**RE: SB 18 Consultation - City of Sausalito Housing Element Programs**

1 message

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**THPO@gratonrancheria.com** <THPO@gratonrancheria.com>

Tue, Aug 15, 2023 at 8:45 AM

To: Brandon Phipps <bhipps@sausalito.gov>

Cc: Christina Erwin <cerwin@denovoplanning.com>, Hector Garcia <HGarcia@gratonrancheria.com>

Dear Mr. Phipps

The Tribe has received the project notification letter dated July 28, 2023 requesting interest and input regarding the City of Sausalito Housing Element Programs project. We appreciate your effort to contact the Tribe. The Tribal Heritage Preservation Office staff has reviewed the project information. Please see the attached SB 18 letter and we look forward to hearing from you.

Sincerely,

Buffy McQuillen

Tribal Heritage Preservation Officer (THPO)

Native American Graves Protection and Repatriation Act (NAGPRA)

Office: 707.566.2288; ext. 137

Cell: 707.318.0485

FAX: 707.566.2291

Hector Garcia Cabrales

Cultural Resources Specialist

Federated Indians of Graton Rancheria

[6400 Redwood Drive, Suite 300](#)

[Rohnert Park, CA 94928](#)

[Office: 707.566.2288, ext. 138](#)

[Mobile: 707.478.1737](#)

[Email: hgarcia@gratonrancheria.com](mailto:hgarcia@gratonrancheria.com)



please consider our environment before printing this email.

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**Federated Indians of Graton Rancheria: Proprietary and Confidential**

**Confidentiality Notice:** This transmittal is a confidential communication or may otherwise be privileged. If you are not the intended recipient, you are hereby notified that you have received this transmittal in error and that any review, dissemination, distribution or copying of this transmittal is

strictly prohibited. If you have received this communication in error, please notify this office and immediately delete this message and all its attachments, if any.

**From:** Christina Erwin <[cerwin@denovoplanning.com](mailto:cerwin@denovoplanning.com)>  
**Sent:** Monday, July 31, 2023 12:41:56 PM  
**To:** Gene Buvelot <[GBuvelot@gratonrancheria.com](mailto:GBuvelot@gratonrancheria.com)>; Greg Sarris <[GSarris@gratonrancheria.com](mailto:GSarris@gratonrancheria.com)>  
**Cc:** Brandon Phipps <[bphipps@sausalito.gov](mailto:bphipps@sausalito.gov)>; Phillips, Eric S. <[EPhillips@bwslaw.com](mailto:EPhillips@bwslaw.com)>; Sergio Rudin <[SRudin@bwslaw.com](mailto:SRudin@bwslaw.com)>; Beth Thompson <[bthompson@denovoplanning.com](mailto:bthompson@denovoplanning.com)>; Velyvis, Stephen E. <[SVelyvis@bwslaw.com](mailto:SVelyvis@bwslaw.com)>; [ntoft@sausalito.gov](mailto:ntoft@sausalito.gov) <[ntoft@sausalito.gov](mailto:ntoft@sausalito.gov)>  
**Subject:** SB 18 Consultation - City of Sausalito

Good afternoon,

This email is to provide you with notice, under Senate Bill 18, of the City of Sausalito Housing Element Programs project. If you have any questions, or would like to set up a consultation, please contact me at [cerwin@denovoplanning.com](mailto:cerwin@denovoplanning.com) or Brandon Phipps, the City's Community and Economic Development Director, at [bphipps@sausalito.gov](mailto:bphipps@sausalito.gov) and provide the primary point of contact for the tribe.

Thank you,  
Christina

Christina Erwin | Principal Planner


De Novo Planning Group | [www.denovoplanning.com](http://www.denovoplanning.com)

[cerwin@denovoplanning.com](mailto:cerwin@denovoplanning.com) | [916.997.1865](tel:916.997.1865)

Northern California | 1020 Suncastr Lane #106 | El Dorado Hills, CA 95762


Southern California | 180 East Main Street #108 | Tustin, CA 92780

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 **Housing Element Program\_FIGR SB 18 Ltr 8.15.23.pdf**  
238K



Submitted via electronic e-mail: [bhipps@sausalito.gov](mailto:bhipps@sausalito.gov)

is   
August 11, 2023

Brandon Phipps  
Community and Economic Development Director  
City of Sausalito Community Development  
420 Litho Street  
Sausalito, CA 94965

Re: City of Sausalito Housing Element Programs

Dear Mr. Phipps,

The Federated Indians of Graton Rancheria appreciates the opportunity to engage in consultation with the City of Sausalito (City) on the *City of Sausalito Housing Element Programs*. The City sent a letter to the Tribe dated July 28, 2023, as a formal notification under Senate Bill 18 (SB 18; California Government Code 6352.3).

We understand the City recently updated their Housing Element consistent with the requirements of State law to address housing. As a result, the City is currently taking steps to implement Housing Element Programs to accommodate actions necessary to ensure the City's sites inventory accommodates the Regional Housing Needs Assessment (RHNA) requirements for the 6<sup>th</sup> Cycle Housing Element Planning Period. The City of Sausalito is within the traditionally and culturally affiliated areas of the Tribe and the Tribe has great interest in protecting environmental and cultural resources.

In closing, the Tribe appreciates the opportunity to review the update and would like to consult pursuant to Senate Bill 18. Please contact my office at (707) 566-2288 or by email at [thpo@gratonrancheria.com](mailto:thpo@gratonrancheria.com) for further consultation and scheduling.

Sincerely,



Buffy McQuillen, THPO  
Federated Indians of Graton Rancheria

# **APPENDIX D**

## **Noise Data**

### CONTENTS

Appendix D.1: Acoustical Terminology

Appendix D.2: Continuous and Short-Term Ambient Noise Measurement Results

Appendix D.3: Traffic Noise Calculation Inputs and Results

## Appendix D.1: Acoustical Terminology

<b>Acoustics</b>	The science of sound.
<b>Ambient Noise</b>	The distinctive acoustical characteristics of a given space consisting of all noise sources audible at that location. In many cases, the term ambient is used to describe an existing or pre-project condition such as the setting in an environmental noise study.
<b>ASTC</b>	Apparent Sound Transmission Class. Similar to STC but includes sound from flanking paths and correct for room reverberation. A larger number means more attenuation. The scale, like the decibel scale for sound, is logarithmic.
<b>Attenuation</b>	The reduction of an acoustic signal.
<b>A-Weighting</b>	A frequency-response adjustment of a sound level meter that conditions the output signal to approximate human response.
<b>Decibel or dB</b>	Fundamental unit of sound, A Bell is defined as the logarithm of the ratio of the sound pressure squared over the reference pressure squared. A Decibel is one-tenth of a Bell.
<b>CNEL</b>	Community Noise Equivalent Level. Defined as the 24-hour average noise level with noise occurring during evening hours (7 - 10 p.m.) weighted by +5 dBA and nighttime hours weighted by +10 dBA.
<b>DNL</b>	See definition of Ldn.
<b>IIC</b>	Impact Insulation Class. An integer-number rating of how well a building floor attenuates impact sounds, such as footsteps. A larger number means more attenuation. The scale, like the decibel scale for sound, is logarithmic.
<b>Frequency</b>	The measure of the rapidity of alterations of a periodic signal, expressed in cycles per second or hertz (Hz).
<b>Ldn</b>	Day/Night Average Sound Level. Similar to CNEL but with no evening weighting.
<b>Leq</b>	Equivalent or energy-averaged sound level.
<b>Lmax</b>	The highest root-mean-square (RMS) sound level measured over a given period of time.
<b>L(n)</b>	The sound level exceeded a described percentile over a measurement period. For instance, an hourly L50 is the sound level exceeded 50% of the time during the one-hour period.
<b>Loudness</b>	A subjective term for the sensation of the magnitude of sound.
<b>NIC</b>	Noise Isolation Class. A rating of the noise reduction between two spaces. Similar to STC but includes sound from flanking paths and no correction for room reverberation.
<b>NNIC</b>	Normalized Noise Isolation Class. Similar to NIC but includes a correction for room reverberation.
<b>Noise</b>	Unwanted sound.
<b>NRC</b>	Noise Reduction Coefficient. NRC is a single-number rating of the sound-absorption of a material equal to the arithmetic mean of the sound-absorption coefficients in the 250, 500, 1000, and 2,000 Hz octave frequency bands rounded to the nearest multiple of 0.05. It is a representation of the amount of sound energy absorbed upon striking a particular surface. An NRC of 0 indicates perfect reflection; an NRC of 1 indicates perfect absorption.
<b>RT60</b>	The time it takes reverberant sound to decay by 60 dB once the source has been removed.
<b>Sabin</b>	The unit of sound absorption. One square foot of material absorbing 100% of incident sound has an absorption of 1 Sabin.
<b>SEL</b>	Sound Exposure Level. SEL is a rating, in decibels, of a discrete event, such as an aircraft flyover or train pass by, that compresses the total sound energy into a one-second event.
<b>SPC</b>	Speech Privacy Class. SPC is a method of rating speech privacy in buildings. It is designed to measure the degree of speech privacy provided by a closed room, indicating the degree to which conversations occurring within are kept private from listeners outside the room.
<b>STC</b>	Sound Transmission Class. STC is an integer rating of how well a building partition attenuates airborne sound. It is widely used to rate interior partitions, ceilings/floors, doors, windows and exterior wall configurations. The STC rating is typically used to rate the sound transmission of a specific building element when tested in laboratory conditions where flanking paths around the assembly don't exist. A larger number means more attenuation. The scale, like the decibel scale for sound, is logarithmic.
<b>Threshold of Hearing</b>	The lowest sound that can be perceived by the human auditory system, generally considered to be 0 dB for persons with perfect hearing.
<b>Threshold of Pain</b>	Approximately 120 dB above the threshold of hearing.
<b>Impulsive</b>	Sound of short duration, usually less than one second, with an abrupt onset and rapid decay.
<b>Simple Tone</b>	Any sound which can be judged as audible as a single pitch or set of single pitches.



## Appendix D.2: Continuous and Short-Term Ambient Noise Measurement Results



**Appendix D.2.1a: Continuous Noise Monitoring Results**

Site: LT-1

Project: City of Sausalito Housing Element

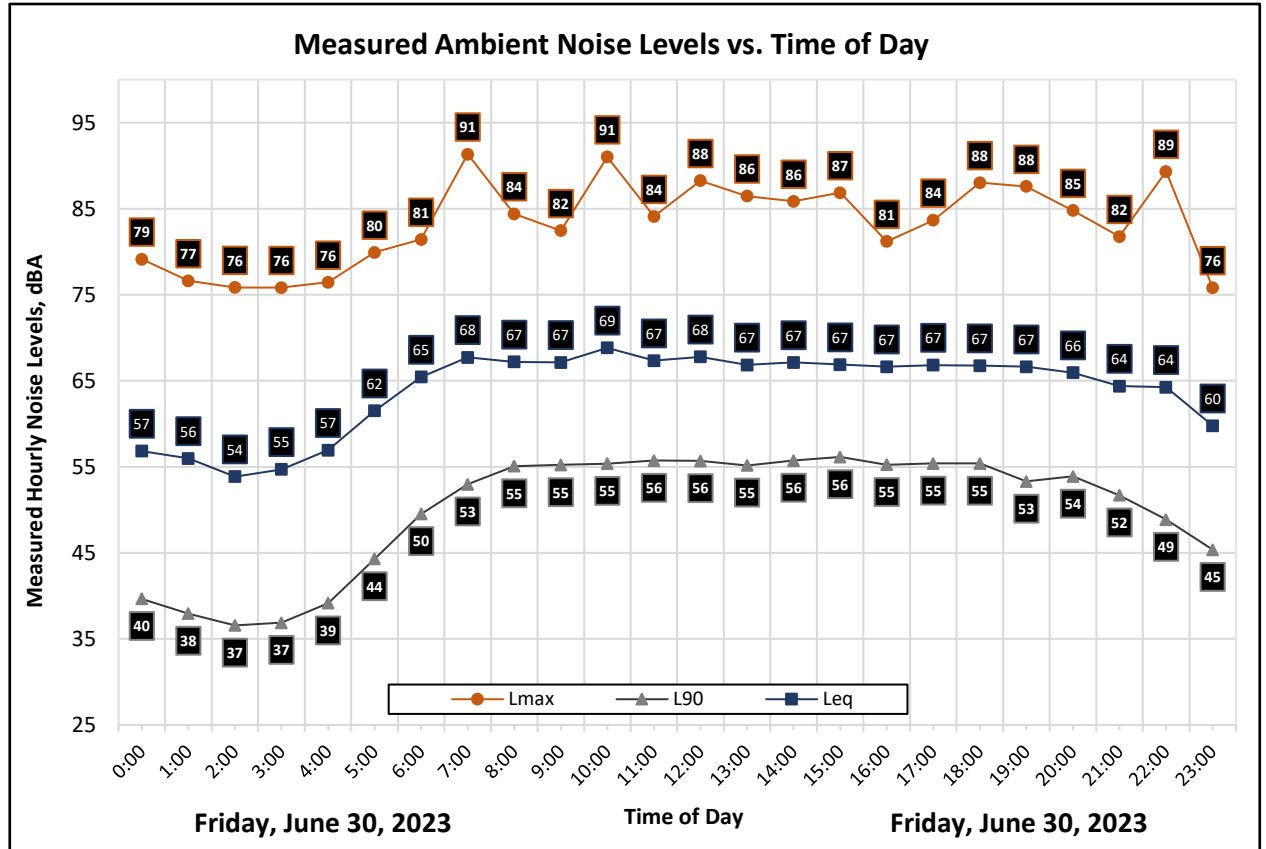
Meter: LDL 820-2

Location: Adjacent to Bridgeway Road

Calibrator: CAL200

Coordinates: (37.8703613, -122.5038444)

Date	Time	Measured Level, dBA			
		L <sub>eq</sub>	L <sub>max</sub>	L <sub>50</sub>	L <sub>90</sub>
Friday, June 30, 2023	0:00	57	79	45	40
Friday, June 30, 2023	1:00	56	77	44	38
Friday, June 30, 2023	2:00	54	76	41	37
Friday, June 30, 2023	3:00	55	76	40	37
Friday, June 30, 2023	4:00	57	76	43	39
Friday, June 30, 2023	5:00	62	80	51	44
Friday, June 30, 2023	6:00	65	81	59	50
Friday, June 30, 2023	7:00	68	91	62	53
Friday, June 30, 2023	8:00	67	84	64	55
Friday, June 30, 2023	9:00	67	82	65	55
Friday, June 30, 2023	10:00	69	91	65	55
Friday, June 30, 2023	11:00	67	84	65	56
Friday, June 30, 2023	12:00	68	88	65	56
Friday, June 30, 2023	13:00	67	86	64	55
Friday, June 30, 2023	14:00	67	86	65	56
Friday, June 30, 2023	15:00	67	87	64	56
Friday, June 30, 2023	16:00	67	81	64	55
Friday, June 30, 2023	17:00	67	84	65	55
Friday, June 30, 2023	18:00	67	88	64	55
Friday, June 30, 2023	19:00	67	88	63	53
Friday, June 30, 2023	20:00	66	85	63	54
Friday, June 30, 2023	21:00	64	82	61	52
Friday, June 30, 2023	22:00	64	89	58	49
Friday, June 30, 2023	23:00	60	76	51	45



Statistics	Leq	Lmax	L50	L90
Day Average	67	86	64	55
Night Average	60	79	48	42
Day Low	64	81	61	52
Day High	69	91	65	56
Night Low	54	76	40	37
Night High	65	89	59	50
Ldn	68	Day %		91
CNEL	69	Night %		9



**Appendix D.2.1b: Continuous Noise Monitoring Results**

Site: LT-1

Project: City of Sausalito Housing Element

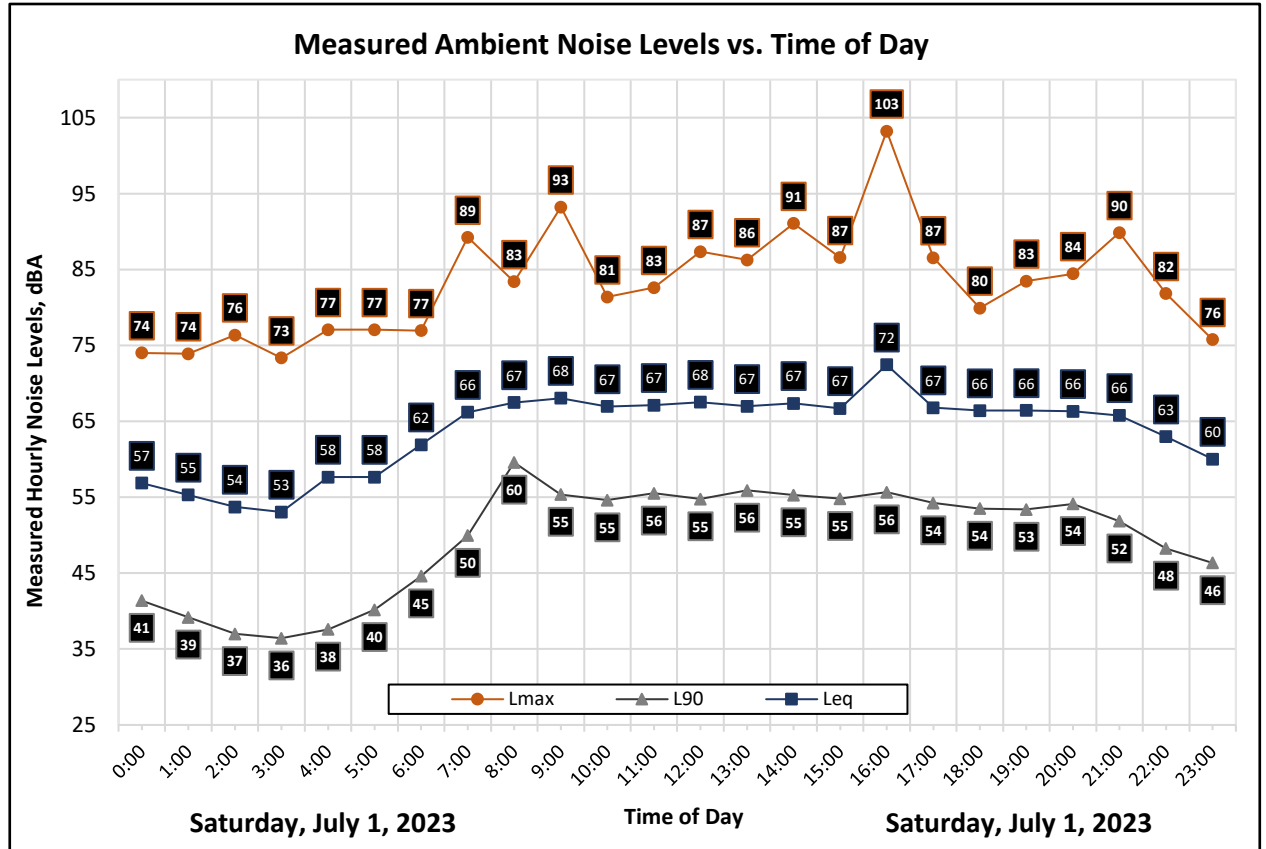
Meter: LDL 820-2

Location: Adjacent to Bridgeway Road

Calibrator: CAL200

Coordinates: (37.8703613, -122.5038444)

Date	Time	Measured Level, dBA			
		L <sub>eq</sub>	L <sub>max</sub>	L <sub>50</sub>	L <sub>90</sub>
Saturday, July 1, 2023	0:00	57	74	48	41
Saturday, July 1, 2023	1:00	55	74	44	39
Saturday, July 1, 2023	2:00	54	76	42	37
Saturday, July 1, 2023	3:00	53	73	40	36
Saturday, July 1, 2023	4:00	58	77	42	38
Saturday, July 1, 2023	5:00	58	77	45	40
Saturday, July 1, 2023	6:00	62	77	52	45
Saturday, July 1, 2023	7:00	66	89	59	50
Saturday, July 1, 2023	8:00	67	83	64	60
Saturday, July 1, 2023	9:00	68	93	64	55
Saturday, July 1, 2023	10:00	67	81	64	55
Saturday, July 1, 2023	11:00	67	83	66	56
Saturday, July 1, 2023	12:00	68	87	65	55
Saturday, July 1, 2023	13:00	67	86	65	56
Saturday, July 1, 2023	14:00	67	91	64	55
Saturday, July 1, 2023	15:00	67	87	64	55
Saturday, July 1, 2023	16:00	72	103	65	56
Saturday, July 1, 2023	17:00	67	87	64	54
Saturday, July 1, 2023	18:00	66	80	64	54
Saturday, July 1, 2023	19:00	66	83	64	53
Saturday, July 1, 2023	20:00	66	84	63	54
Saturday, July 1, 2023	21:00	66	90	62	52
Saturday, July 1, 2023	22:00	63	82	58	48
Saturday, July 1, 2023	23:00	60	76	53	46



Statistics	L <sub>eq</sub>	L <sub>max</sub>	L <sub>50</sub>	L <sub>90</sub>
Day Average	68	87	64	55
Night Average	58	76	47	41
Day Low	66	80	59	50
Day High	72	103	66	60
Night Low	53	73	40	36
Night High	62	82	58	48
L <sub>dn</sub>	68	Day %		95
CNEL	68	Night %		5



**Appendix D.2.1c: Continuous Noise Monitoring Results**

Site: LT-1

Project: City of Sausalito Housing Element

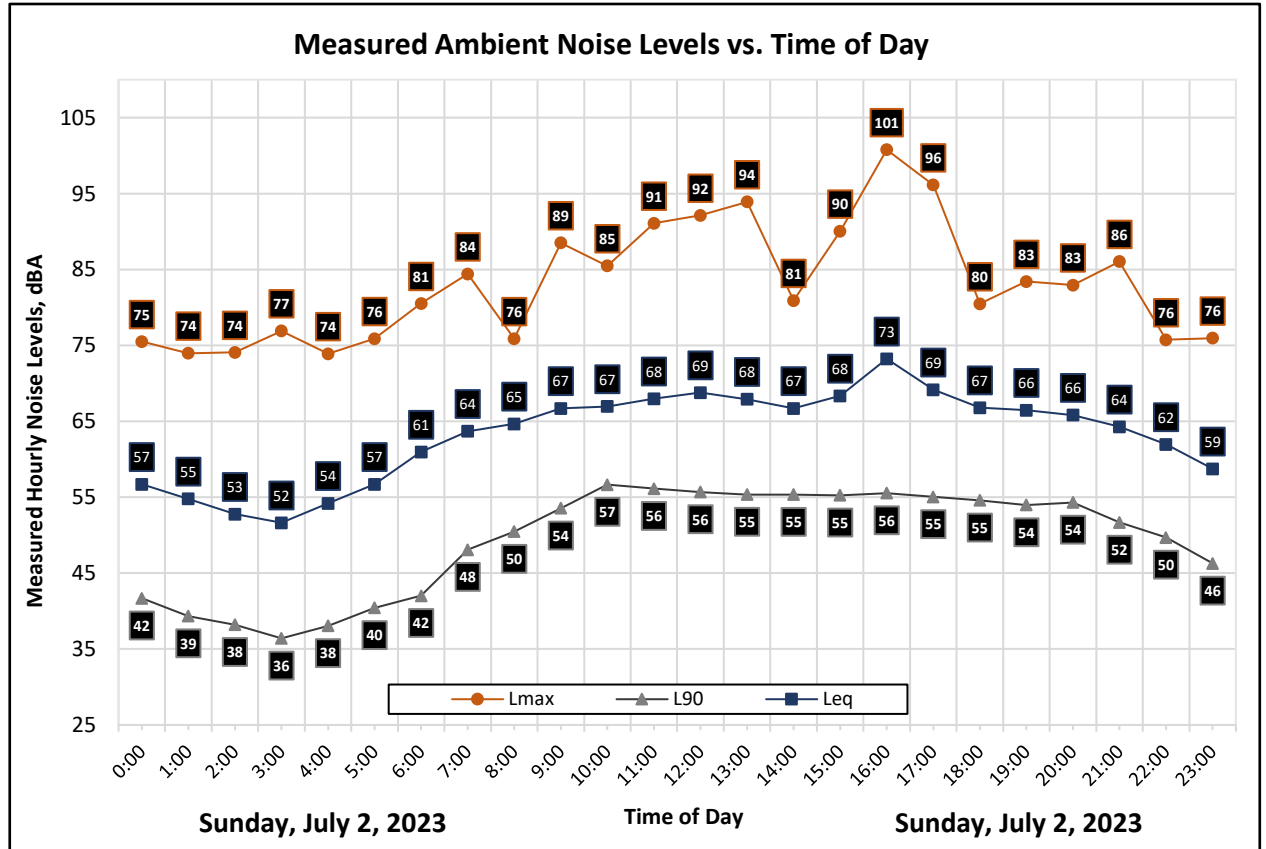
Meter: LDL 820-2

Location: Adjacent to Bridgeway Road

Calibrator: CAL200

Coordinates: (37.8703613, -122.5038444)

Date	Time	Measured Level, dBA			
		L <sub>eq</sub>	L <sub>max</sub>	L <sub>50</sub>	L <sub>90</sub>
Sunday, July 2, 2023	0:00	57	75	46	42
Sunday, July 2, 2023	1:00	55	74	44	39
Sunday, July 2, 2023	2:00	53	74	42	38
Sunday, July 2, 2023	3:00	52	77	40	36
Sunday, July 2, 2023	4:00	54	74	41	38
Sunday, July 2, 2023	5:00	57	76	45	40
Sunday, July 2, 2023	6:00	61	81	49	42
Sunday, July 2, 2023	7:00	64	84	57	48
Sunday, July 2, 2023	8:00	65	76	60	50
Sunday, July 2, 2023	9:00	67	89	62	54
Sunday, July 2, 2023	10:00	67	85	64	57
Sunday, July 2, 2023	11:00	68	91	65	56
Sunday, July 2, 2023	12:00	69	92	65	56
Sunday, July 2, 2023	13:00	68	94	65	55
Sunday, July 2, 2023	14:00	67	81	65	55
Sunday, July 2, 2023	15:00	68	90	65	55
Sunday, July 2, 2023	16:00	73	101	65	56
Sunday, July 2, 2023	17:00	69	96	64	55
Sunday, July 2, 2023	18:00	67	80	65	55
Sunday, July 2, 2023	19:00	66	83	64	54
Sunday, July 2, 2023	20:00	66	83	63	54
Sunday, July 2, 2023	21:00	64	86	61	52
Sunday, July 2, 2023	22:00	62	76	57	50
Sunday, July 2, 2023	23:00	59	76	51	46



Statistics	Leq	Lmax	L50	L90
Day Average	68	87	63	54
Night Average	57	76	46	41
Day Low	64	76	57	48
Day High	73	101	65	57
Night Low	52	74	40	36
Night High	61	81	57	50
Ldn	67	Day %		96
CNEL	68	Night %		4



**Appendix D.2.2a: Continuous Noise Monitoring Results**

Site: LT-2

Project: City of Sausalito Housing Element

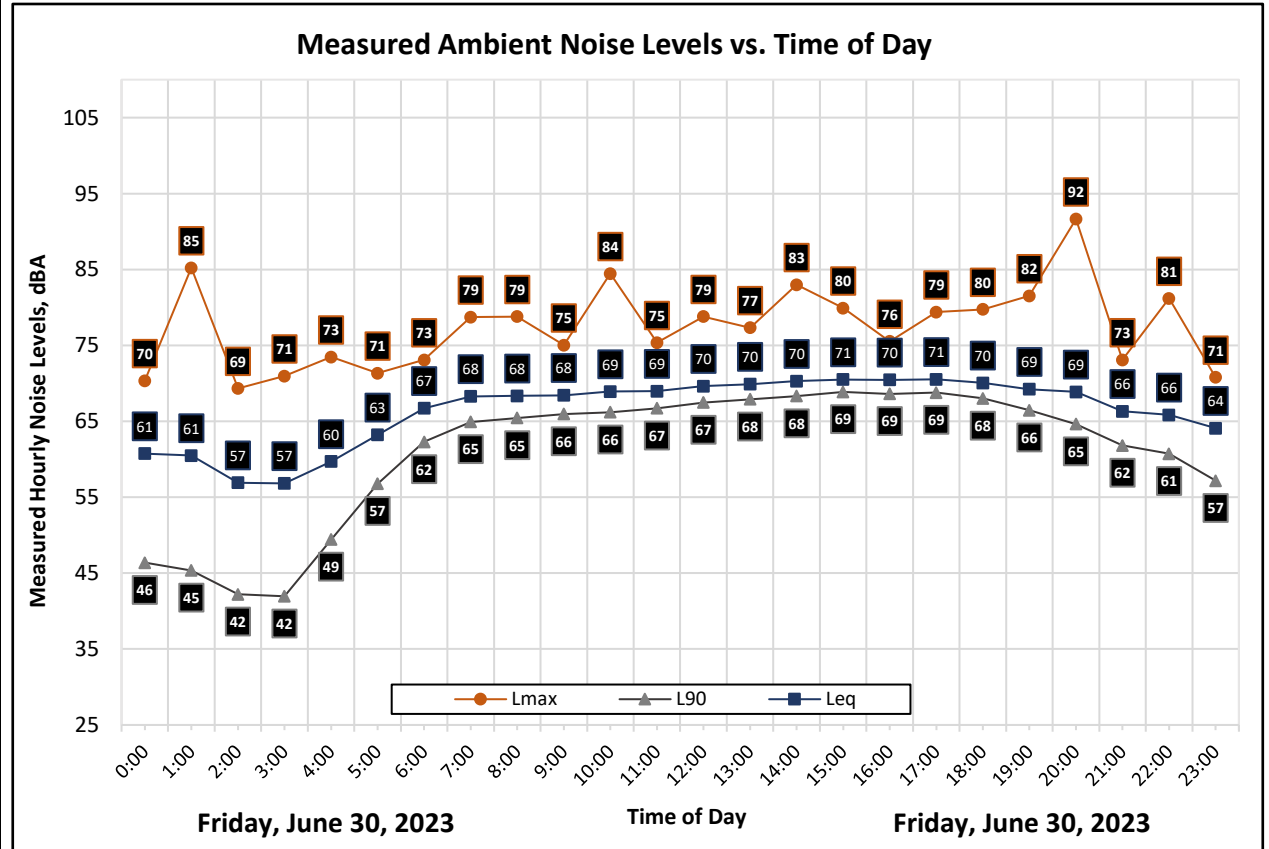
Meter: LDL 820-3

Location: Adjacent to U.S Route 101

Calibrator: CAL200

Coordinates: (37.8515093, -122.4899435)

Date	Time	Measured Level, dBA			
		L <sub>eq</sub>	L <sub>max</sub>	L <sub>50</sub>	L <sub>90</sub>
Friday, June 30, 2023	0:00	61	70	59	46
Friday, June 30, 2023	1:00	61	85	56	45
Friday, June 30, 2023	2:00	57	69	52	42
Friday, June 30, 2023	3:00	57	71	52	42
Friday, June 30, 2023	4:00	60	73	58	49
Friday, June 30, 2023	5:00	63	71	62	57
Friday, June 30, 2023	6:00	67	73	66	62
Friday, June 30, 2023	7:00	68	79	68	65
Friday, June 30, 2023	8:00	68	79	68	65
Friday, June 30, 2023	9:00	68	75	68	66
Friday, June 30, 2023	10:00	69	84	69	66
Friday, June 30, 2023	11:00	69	75	69	67
Friday, June 30, 2023	12:00	70	79	69	67
Friday, June 30, 2023	13:00	70	77	70	68
Friday, June 30, 2023	14:00	70	83	70	68
Friday, June 30, 2023	15:00	71	80	70	69
Friday, June 30, 2023	16:00	70	76	70	69
Friday, June 30, 2023	17:00	71	79	70	69
Friday, June 30, 2023	18:00	70	80	70	68
Friday, June 30, 2023	19:00	69	82	69	66
Friday, June 30, 2023	20:00	69	92	68	65
Friday, June 30, 2023	21:00	66	73	66	62
Friday, June 30, 2023	22:00	66	81	65	61
Friday, June 30, 2023	23:00	64	71	63	57



Statistics	Leq	Lmax	L50	L90
Day Average	69	79	69	67
Night Average	62	74	59	51
Day Low	66	73	66	62
Day High	71	92	70	69
Night Low	57	69	52	42
Night High	67	85	66	62
Ldn	70	Day %		91
CNEL	71	Night %		9



**Appendix D.2.2b: Continuous Noise Monitoring Results**

Site: LT-2

Project: City of Sausalito Housing Element

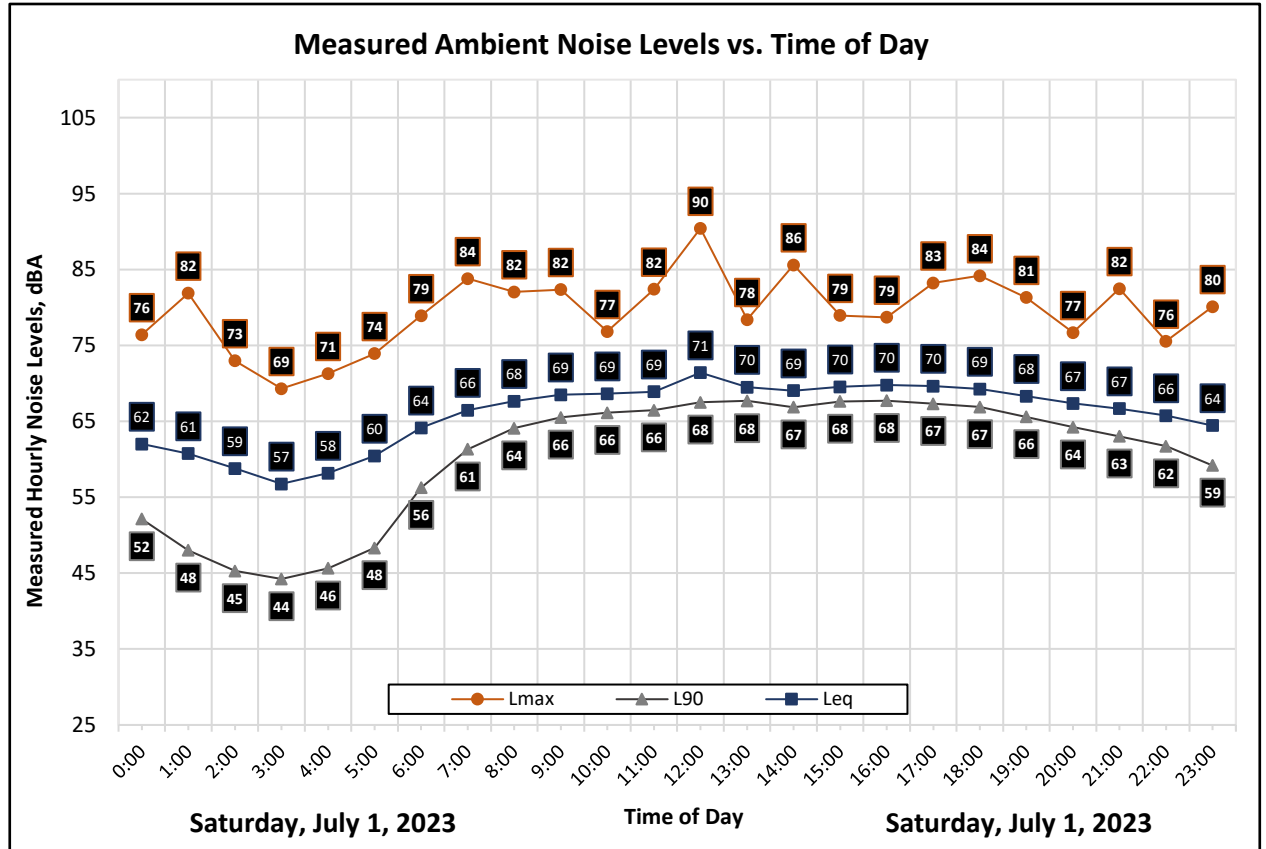
Meter: LDL 820-3

Location: Adjacent to U.S Route 101

Calibrator: CAL200

Coordinates: (37.8515093, -122.4899435)

Date	Time	Measured Level, dBA			
		L <sub>eq</sub>	L <sub>max</sub>	L <sub>50</sub>	L <sub>90</sub>
Saturday, July 1, 2023	0:00	62	76	60	52
Saturday, July 1, 2023	1:00	61	82	58	48
Saturday, July 1, 2023	2:00	59	73	56	45
Saturday, July 1, 2023	3:00	57	69	53	44
Saturday, July 1, 2023	4:00	58	71	55	46
Saturday, July 1, 2023	5:00	60	74	58	48
Saturday, July 1, 2023	6:00	64	79	63	56
Saturday, July 1, 2023	7:00	66	84	66	61
Saturday, July 1, 2023	8:00	68	82	67	64
Saturday, July 1, 2023	9:00	69	82	68	66
Saturday, July 1, 2023	10:00	69	77	69	66
Saturday, July 1, 2023	11:00	69	82	69	66
Saturday, July 1, 2023	12:00	71	90	69	68
Saturday, July 1, 2023	13:00	70	78	69	68
Saturday, July 1, 2023	14:00	69	86	69	67
Saturday, July 1, 2023	15:00	70	79	69	68
Saturday, July 1, 2023	16:00	70	79	70	68
Saturday, July 1, 2023	17:00	70	83	69	67
Saturday, July 1, 2023	18:00	69	84	69	67
Saturday, July 1, 2023	19:00	68	81	68	66
Saturday, July 1, 2023	20:00	67	77	67	64
Saturday, July 1, 2023	21:00	67	82	66	63
Saturday, July 1, 2023	22:00	66	76	65	62
Saturday, July 1, 2023	23:00	64	80	64	59



Statistics	Leq	Lmax	L50	L90
Day Average	69	82	68	66
Night Average	61	76	59	51
Day Low	66	77	66	61
Day High	71	90	70	68
Night Low	57	69	53	44
Night High	64	82	65	62
Ldn	70	Day %		91
CNEL	70	Night %		9



**Appendix D.2.2c: Continuous Noise Monitoring Results**

Site: LT-2

Project: City of Sausalito Housing Element

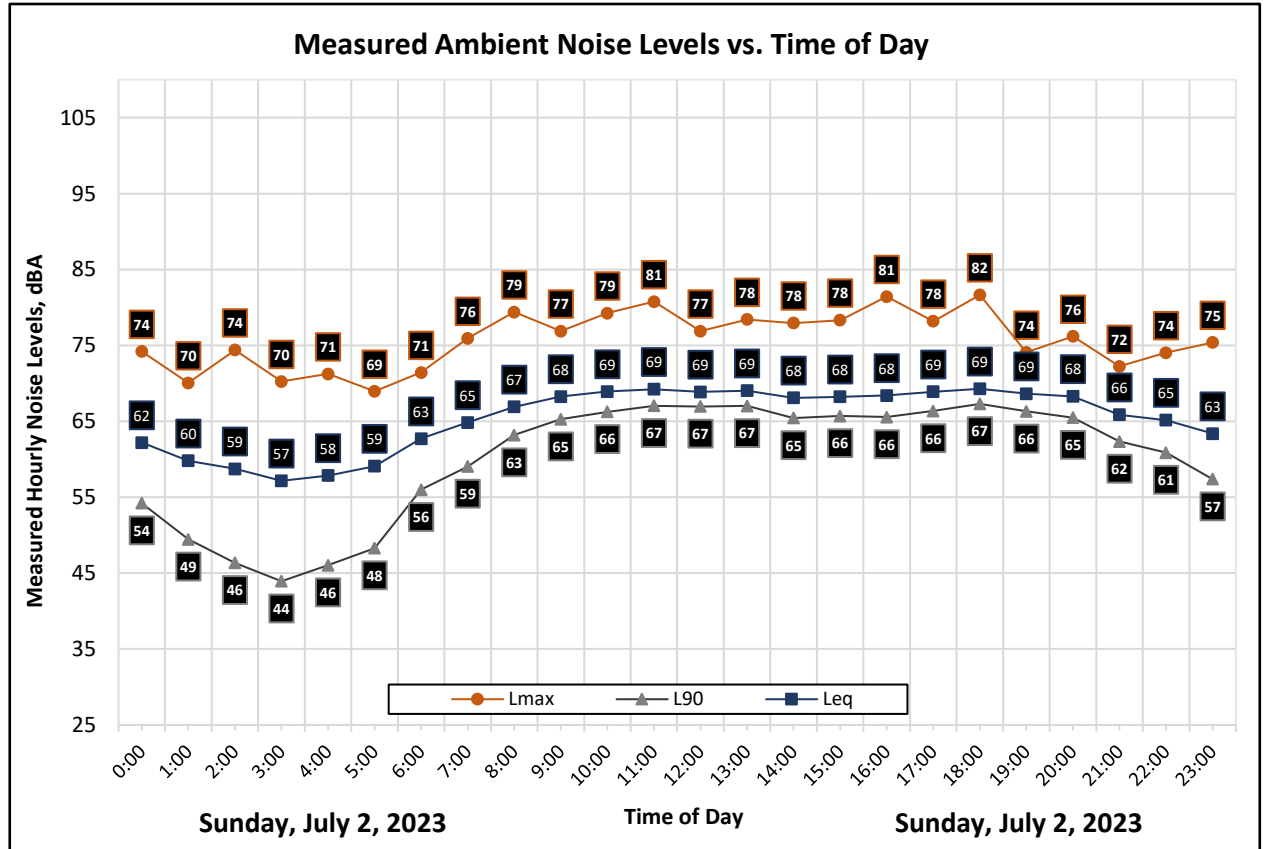
Meter: LDL 820-3

Location: Adjacent to U.S Route 101

Calibrator: CAL200

Coordinates: (37.8515093, -122.4899435)

Date	Time	Measured Level, dBA			
		L <sub>eq</sub>	L <sub>max</sub>	L <sub>50</sub>	L <sub>90</sub>
Sunday, July 2, 2023	0:00	62	74	61	54
Sunday, July 2, 2023	1:00	60	70	58	49
Sunday, July 2, 2023	2:00	59	74	56	46
Sunday, July 2, 2023	3:00	57	70	54	44
Sunday, July 2, 2023	4:00	58	71	55	46
Sunday, July 2, 2023	5:00	59	69	57	48
Sunday, July 2, 2023	6:00	63	71	62	56
Sunday, July 2, 2023	7:00	65	76	64	59
Sunday, July 2, 2023	8:00	67	79	67	63
Sunday, July 2, 2023	9:00	68	77	68	65
Sunday, July 2, 2023	10:00	69	79	69	66
Sunday, July 2, 2023	11:00	69	81	69	67
Sunday, July 2, 2023	12:00	69	77	69	67
Sunday, July 2, 2023	13:00	69	78	69	67
Sunday, July 2, 2023	14:00	68	78	68	65
Sunday, July 2, 2023	15:00	68	78	68	66
Sunday, July 2, 2023	16:00	68	81	68	66
Sunday, July 2, 2023	17:00	69	78	69	66
Sunday, July 2, 2023	18:00	69	82	69	67
Sunday, July 2, 2023	19:00	69	74	68	66
Sunday, July 2, 2023	20:00	68	76	68	65
Sunday, July 2, 2023	21:00	66	72	65	62
Sunday, July 2, 2023	22:00	65	74	65	61
Sunday, July 2, 2023	23:00	63	75	63	57



Statistics	Leq	Lmax	L50	L90
Day Average	68	78	68	65
Night Average	61	72	59	51
Day Low	65	72	64	59
Day High	69	82	69	67
Night Low	57	69	54	44
Night High	63	75	65	61
Ldn	69	Day %		91
CNEL	70	Night %		9



**Appendix D.2.3 Short Term Noise Monitoring Results**

**Site: ST-1**

**Project: City of Sausalito Housing Element Update**

**Meter: LDL 831-5**

**Location: 11 Tomales St**

**Calibrator: CAL200**

**Coordinates: (37.8647639, -122.5008902)**

**Start: 2023-06-29 14:54:27**

**Stop: 2023-06-29 15:04:27**

**SLM: Model 831**

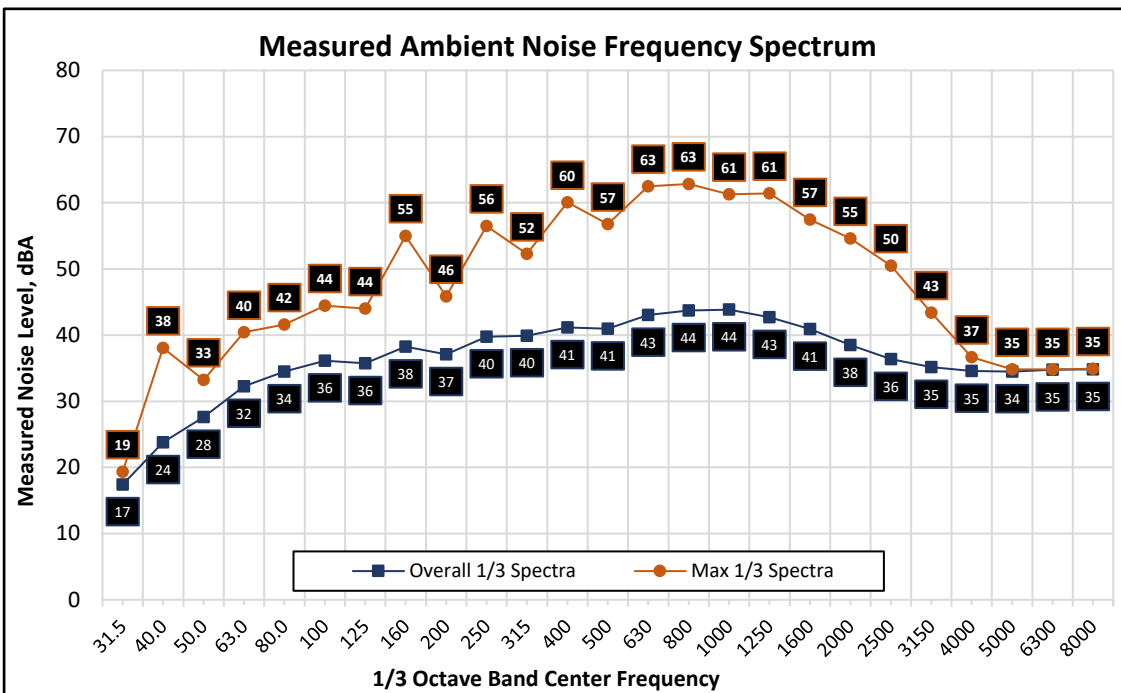
**Serial: 2658**

**Measurement Results, dBA**

**Duration:** 0:10  
**L<sub>eq</sub>:** 52  
**L<sub>max</sub>:** 70  
**L<sub>min</sub>:** 46  
**L<sub>50</sub>:** 49  
**L<sub>90</sub>:** 47

**Notes**

Primary noise source is traffic on local roadway network.  
 Secondary source is distant traffic noise from major roadways.





**Appendix D.2.4 : Short Term Noise Monitoring Results**

Site: ST-2

Project: City of Sausalito Housing Element Update

Meter: LDL 831-5

Location: Bridgeway

Calibrator: CAL200

Coordinates: (37.8608377, -122.4864620)

Start: 2023-06-29 14:30:09

Stop: 2023-06-29 14:40:00

SLM: Model 831

Serial: 2658

**Measurement Results, dBA**

Duration: 0:09

$L_{eq}$ : 55

$L_{max}$ : 68

$L_{min}$ : 51

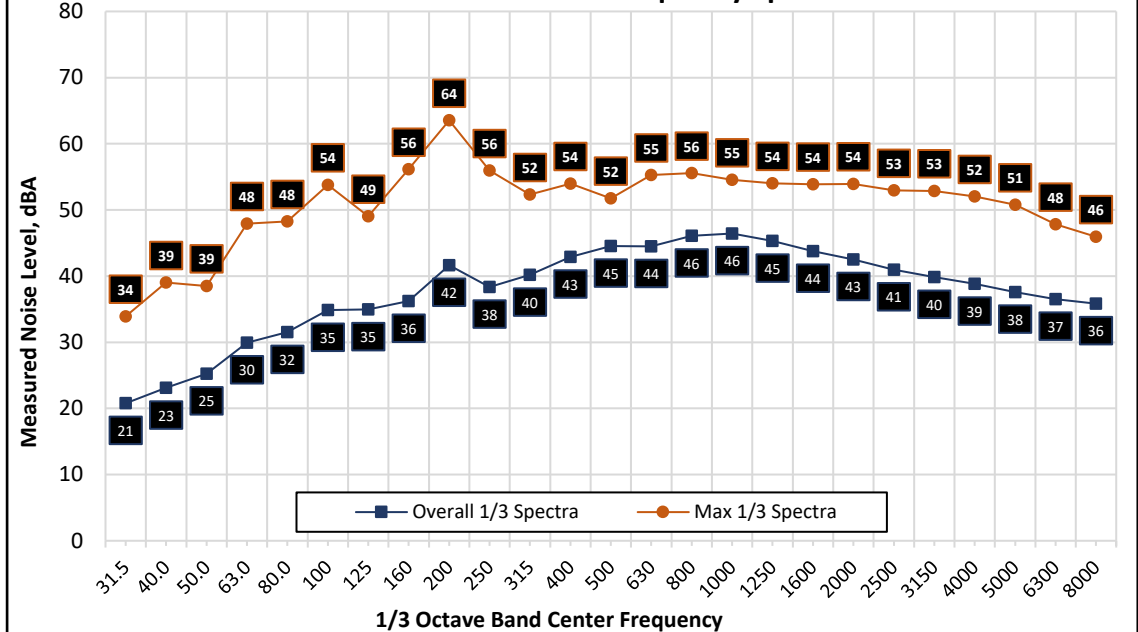
$L_{50}$ : 54

$L_{90}$ : 53

**Notes**

Primary noise source is traffic on Bridgeway.

**Measured Ambient Noise Frequency Spectrum**



**Noise Measurement Site**



**Appendix D.2.5 : Short Term Noise Monitoring Results**

**Site: ST-3**

**Project: City of Sausalito Housing Element Update**

**Meter: LDL 831-5**

**Location: Bulkley Avenue**

**Calibrator: CAL200**

**Coordinates: (37.8647639, -122.5008902)**

**Start: 2023-06-29 15:21:46**

**Stop: 2023-06-29 15:31:46**

**SLM: Model 831**

**Serial: 2658**

**Measurement Results, dBA**

**Duration: 0:10**

**L<sub>eq</sub>: 50**

**L<sub>max</sub>: 65**

**L<sub>min</sub>: 39**

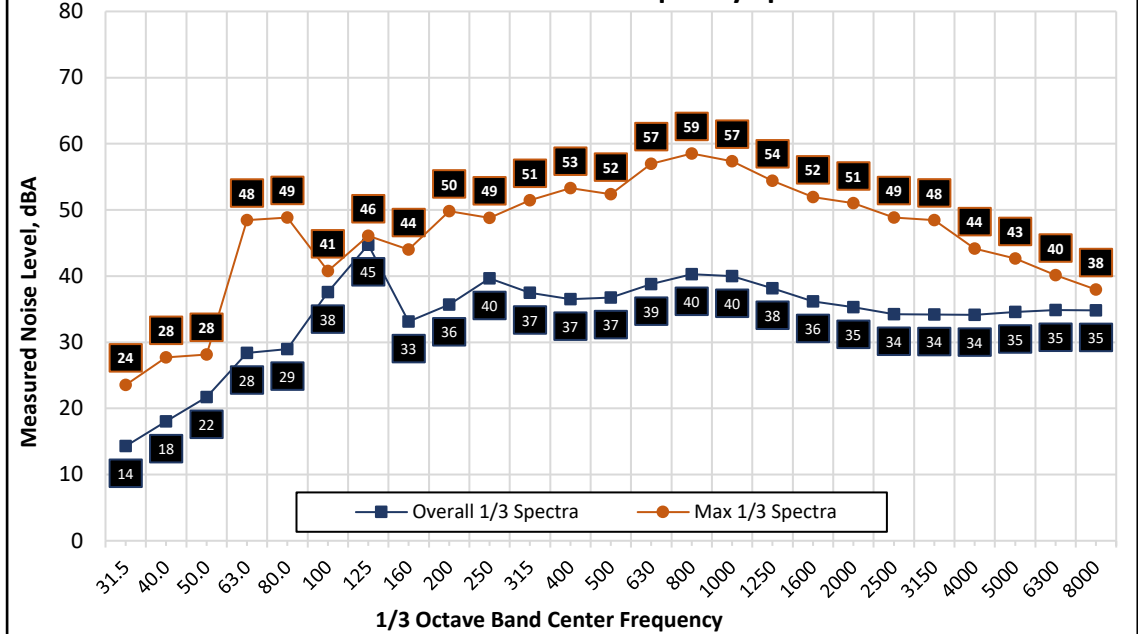
**L<sub>50</sub>: 40**

**L<sub>90</sub>: 40**

**Notes**

Primary noise source is traffic on Bulkley Avenue. Secondary noise source is nature sounds.

**Measured Ambient Noise Frequency Spectrum**



**Noise Measurement Site**



**Appendix D.2.6 : Short Term Noise Monitoring Results**

**Site: ST-4**

**Project: City of Sausalito Housing Element Update**

**Meter: LDL 831-5**

**Location: Sausalito Boulevard**

**Calibrator: CAL200**

**Coordinates: (37.8512143, -122.4858735)**

**Start: 2023-06-29 15:40:17**

**Stop: 2023-06-29 15:50:17**

**SLM: Model 831**

**Serial: 2658**

**Measurement Results, dBA**

**Duration: 0:10**

**L<sub>eq</sub>: 57**

**L<sub>max</sub>: 76**

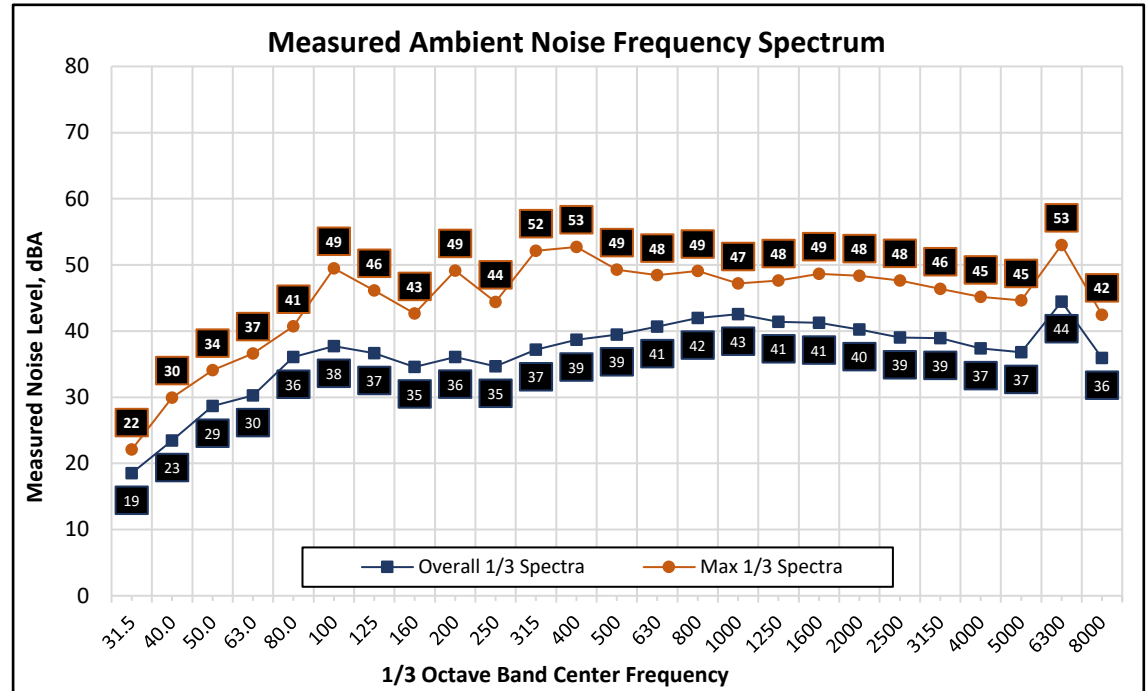
**L<sub>min</sub>: 45**

**L<sub>50</sub>: 48**

**L<sub>90</sub>: 46**

**Notes**

Primary noise source is traffic on Sausalito Boulevard. Traffic noise from Highway 101 was observed during measurement.



**Appendix D.2.7 : Short Term Noise Monitoring Results**

Site: ST-5

Project: City of Sausalito Housing Element Update

Meter: LDL 831-5

Location: Lower Crescent Avenue

Calibrator: CAL200

Coordinates: (37.8512143, -122.4858735)

Start: 2023-06-29 15:55:45

Stop: 2023-06-29 16:05:45

SLM: Model 831

Serial: 2658

**Measurement Results, dBA**

Duration: 0:10

$L_{eq}$ : 56

$L_{max}$ : 61

$L_{min}$ : 53

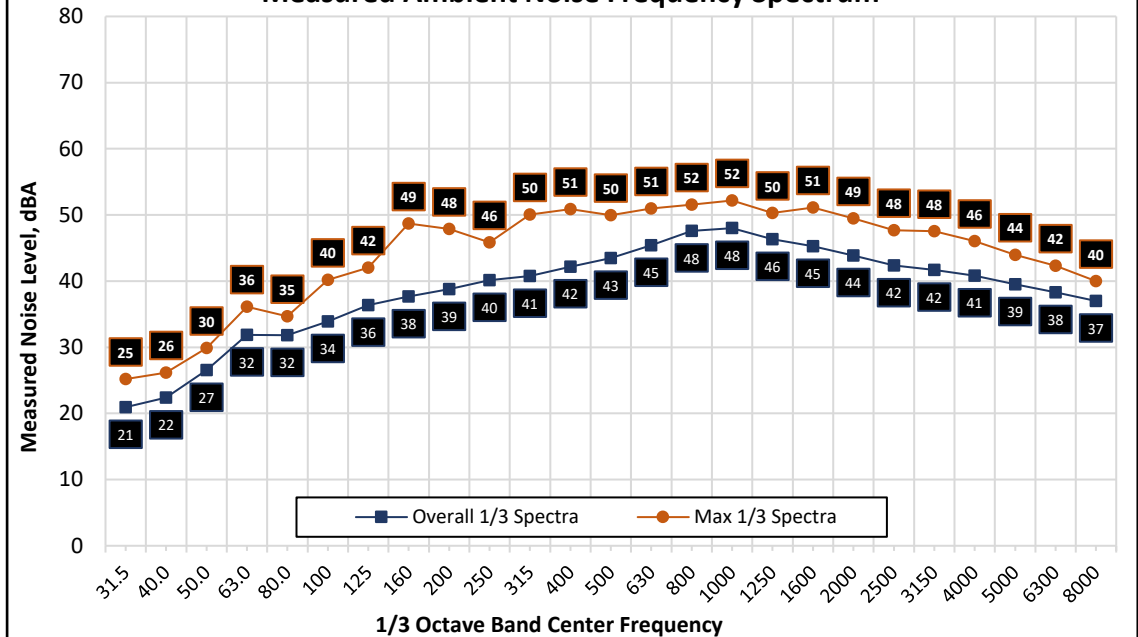
$L_{50}$ : 55

$L_{90}$ : 54

**Notes**

Primary noise source is traffic on Highway 101.

**Measured Ambient Noise Frequency Spectrum**



**Noise Measurement Site**



## Appendix D.3: Traffic Noise Calculation Inputs and Results



**Appendix D.3-1**

**FHWA-RD-77-108 Highway Traffic Noise Prediction Model**

**Project #:** 230522

**Description:** City of Sausalito Housing Element - Existing Traffic

**Ldn/CNEL:** Ldn

**Hard/Soft:** Soft

Segment	Roadway	Segment	ADT	Day %	Eve %	Night %	% Med. Trucks	% Hvy. Trucks	Speed	Distance	Offset (dB)	Contours (ft.) - No Offset			Level, dBA
												60 dBA	65 dBA	70 dBA	
1	Bridgeway SO US 101	South of US 101	28,143	91	0	9	1.0%	1.0%	35	50	-5	164	76	35	62.7
2	Bridgeway SO Coloma	South of Coloma St.	28,404	91	0	9	1.0%	1.0%	35	50	0	165	77	36	67.8
3	Bridgeway NO Marin	North of Marinship Way	23,463	91	0	9	1.0%	1.0%	35	50	0	145	68	31	67.0
4	Bridgeway NO Napa St	North of Napa St.	21,210	91	0	9	1.0%	1.0%	35	50	0	136	63	29	66.5
5	Bridgeway NO Anchor	North of Anchor St.	11,258	91	0	9	1.0%	1.0%	35	50	-5	89	41	19	58.8
6	Coloma St WO Bridge	West of Bridgeway	867	91	0	9	1.0%	1.0%	25	50	-5	11	5	2	45.0
7	Coloma St EO Bridgew	East of Bridgeway	182	91	0	9	1.0%	1.0%	25	50	-5	4	2	1	38.2
8	Bulkley Ave EO Santa	East of Santa Rosa Avenue	120	91	0	9	1.0%	1.0%	25	50	0	3	1	1	41.4
9	Bulkley Ave WO Harris	West of Harrison Ave.	422	91	0	9	1.0%	1.0%	25	50	-5	7	3	1	41.8

**Appendix D.3-2**

**FHWA-RD-77-108 Highway Traffic Noise Prediction Model**

**Project #:** 230522

**Description:** City of Sausalito Housing Element - Existing Traffic Plus Project

**Ldn/CNEL:** Ldn

**Hard/Soft:** Soft

Segment	Roadway	Segment	ADT	Day %	Eve %	Night %	% Med. Trucks	% Hvy. Trucks	Speed	Distance	Offset (dB)	Contours (ft.) - No Offset			Level, dBA
												60 dBA	65 dBA	70 dBA	
1	Bridgeway SO US 101	South of US 101	29,524	91	0	9	1.0%	1.0%	35	50	-5	170	79	37	63.0
2	Bridgeway SO Coloma	South of Coloma St.	29,712	91	0	9	1.0%	1.0%	35	50	0	170	79	37	68.0
3	Bridgeway NO Marin	North of Marinship Way	23,961	91	0	9	1.0%	1.0%	35	50	0	148	68	32	67.0
4	Bridgeway NO Napa St	North of Napa St.	21,641	91	0	9	1.0%	1.0%	35	50	0	138	64	30	66.6
5	Bridgeway NO Anchor	North of Anchor St.	10,956	91	0	9	1.0%	1.0%	35	50	-5	88	41	19	58.6
6	Coloma St WO Bridge	West of Bridgeway	882	91	0	9	1.0%	1.0%	25	50	-5	11	5	2	45.0
7	Coloma St EO Bridge	East of Bridgeway	193	91	0	9	1.0%	1.0%	25	50	-5	4	2	1	38.4
8	Bulkley Ave EO Santa	East of Santa Rosa Avenue	105	91	0	9	1.0%	1.0%	25	50	0	3	1	1	40.8
9	Bulkley Ave WO Harris	West of Harrison Ave.	432	91	0	9	1.0%	1.0%	25	50	-5	7	3	1	41.9

**Appendix D.3-3**

**FHWA-RD-77-108 Highway Traffic Noise Prediction Model**

**Project #:** 230522

**Description:** City of Sausalito Housing Element - Cumulative Traffic

**Ldn/CNEL:** Ldn

**Hard/Soft:** Soft

Segment	Roadway	Segment	ADT	Day %	Eve %	Night %	% Med. Trucks	% Hvy. Trucks	Speed	Distance	Offset (dB)	Contours (ft.) - No Offset			Level, dBA
												60	65	70	
												dBA	dBA	dBA	
1	Bridgeway SO US 101 South of US 101		31,514	91	0	9	1.0%	1.0%	35	50	-5	177	82	38	63.2
2	Bridgeway SO Coloma South of Coloma St.		31,606	91	0	9	1.0%	1.0%	35	50	0	177	82	38	68.3
3	Bridgeway NO Marinsl North of Marinship Way		26,364	91	0	9	1.0%	1.0%	35	50	0	157	73	34	67.5
4	Bridgeway NO Napa Sl North of Napa St.		24,332	91	0	9	1.0%	1.0%	35	50	0	149	69	32	67.1
5	Bridgeway NO Anchor North of Anchor St.		12,156	91	0	9	1.0%	1.0%	35	50	-5	94	44	20	59.1
6	Coloma St WO Bridgev West of Bridgeway		859	91	0	9	1.0%	1.0%	25	50	-5	11	5	2	44.9
7	Coloma St EO Bridgew East of Bridgeway		253	91	0	9	1.0%	1.0%	25	50	-5	5	2	1	39.6
8	Bulkley Ave EO Santa l East of Santa Rosa Avenue		639	91	0	9	1.0%	1.0%	25	50	0	9	4	2	48.6
9	Bulkley Ave WO Harris West of Harrison Ave.		476	91	0	9	1.0%	1.0%	25	50	-5	7	3	2	42.4



**Appendix D.3-4**

**FHWA-RD-77-108 Highway Traffic Noise Prediction Model**

**Project #:** 230522

**Description:** City of Sausalito Housing Element - Cumulative Traffic Plus Project

**Ldn/CNEL:** Ldn

**Hard/Soft:** Soft

Segment	Roadway	Segment	ADT	Day %	Eve %	Night %	% Med. Trucks	% Hvy. Trucks	Speed	Distance	Offset (dB)	Contours (ft.) - No Offset			Level, dBA
												60 dBA	65 dBA	70 dBA	
1	Bridgeway SO US 101	South of US 101	31,577	91	0	9	1.0%	1.0%	35	50	-5	177	82	38	63.2
2	Bridgeway SO Coloma	South of Coloma St.	31,772	91	0	9	1.0%	1.0%	35	50	0	178	83	38	68.3
3	Bridgeway NO Marin	North of Marinship Way	26,621	91	0	9	1.0%	1.0%	35	50	0	158	73	34	67.5
4	Bridgeway NO Napa St	North of Napa St.	24,872	91	0	9	1.0%	1.0%	35	50	0	151	70	33	67.2
5	Bridgeway NO Anchor	North of Anchor St.	12,258	91	0	9	1.0%	1.0%	35	50	-5	94	44	20	59.1
6	Coloma St WO Bridge	West of Bridgeway	779	91	0	9	1.0%	1.0%	25	50	-5	10	5	2	44.5
7	Coloma St EO Bridge	East of Bridgeway	190	91	0	9	1.0%	1.0%	25	50	-5	4	2	1	38.4
8	Bulkley Ave EO Santa	East of Santa Rosa Avenue	2,274	91	0	9	1.0%	1.0%	25	50	0	20	9	4	54.1
9	Bulkley Ave WO Harris	West of Harrison Ave.	357	91	0	9	1.0%	1.0%	25	50	-5	6	3	1	41.1