County of Marin Community Development Agency

Point Reyes Station USCG Coastal Permit and Conditional Use Permit

Draft Initial Study/Mitigated Negative Declaration

April 2024

717 Market Street, Suite 400
San Francisco, CA 94103
650-373-1200
www.panoramaenv.com

PANORAMA ENVIRONMENTAL, INC.

County of Marin Community Development Agency

Point Reyes Station USCG Coastal Permit and Conditional Use Permit

Draft Initial Study/Mitigated Negative Declaration

April 2024

Prepared for:

County of Marin

3501 Civic Center Drive, Suite 308

San Rafael, CA 949093

Prepared by:

Panorama Environmental, Inc.

717 Market Street, Suite 400

San Francisco, CA 94103

www.panoramaenv.com

PANORAMA ENVIRONMENTAL, INC.

MITIGATED NEGATIVE DECLARATION

Marin County

Environmental Coordination and Review

Pursuant to Section 21000 et. seq. of the Public Resources Code and Marin County Environmental Impact Review Guidelines and Procedures, a Negative Declaration is hereby granted for the following project.

1. Project Name: Pt. Reyes Station U.S. Coast Guard Site Coastal Permit and Conditional Use Permit Affordable Housing Project

2. Location and Description: 100 Commodore Webster Dr., Point Reyes Station

   The project entails adaptively reusing and repurposing the former United States Coast Guard (USCG) developed housing and operations site to provide affordable housing units in Point Reyes Station. The proposed project would rehabilitate existing buildings onsite and provide 54 affordable housing units along with associated residential structures and facilities.

3. Project Sponsor: Community Land Trust Association of West Marin and Eden Housing, Inc.

4. Finding:

   Based on the attached Initial Study and without a public hearing, it is my judgment that:

   ☐ The project will not have a significant effect on the environment.

   ☒ The significant effects of the project noted in the Initial Study attached have been mitigated by modifications to the project so that the potential adverse effects are reduced to a point where no significant effects would occur.

Rachel Reid _____ Date: April 18, 2024

Environmental Planning Manager

Based on the attached Initial Study, a Mitigated Negative Declaration is granted.

[ ] Board of Supervisors or other County decision maker(s)

See approval resolution following project approval on _____

1. Mitigation Measures:

   ☐ No potential adverse impacts were identified, therefore, no mitigation measures are required.

   ☒ Please refer to mitigation measures in the attached Initial Study.

   All of the mitigation measures for the above effects have been incorporated into the project and are embodied in conditions of approval recommended by the Marin County Community Development Agency- Planning Division.

Other conditions of approval in support of these measures may also be advanced.

2. Preparation:

   This Negative Declaration was prepared by Panorama Environmental, Inc. on behalf of the Marin County Community Development Agency - Planning Division. Copies may be obtained at the address listed below.

   Marin County Community Development Agency
   Planning Division
   3501 Civic Center Drive, Suite 308
   San Rafael, CA 94903
   (415) 473-6269
   Check with the Planning Department for information about business hours and/or reviewing copies of the document at the front counter.

   An electronic version is also available for review on the County of Marin Environmental Planning website.

Table of Contents

List of Tables

List of Figures

List of Appendices

Acronyms and Abbreviations

ACM	asbestos-containing material
Air District	Bay Area Air Quality Management District
AMP	Archaeological Monitoring Plan
APE	area of potential effect
AST	aboveground storage tank
BASMAA	Bay Area Stormwater Management Agencies Association
BERD	Built Environment Resource Directory
BESS	battery energy storage system
bgs	below ground surface
BMPs	best management practices
BOD	basis of design
CAA	Clean Air Act
CAAQS	California Ambient Air Quality Standards
CAC	Certified Asbestos Consultant
CalEEMod	California Emissions Estimator Model
California Register	California Register of Historical Resources
CARB	California Air Resources Board
CBC	California Building Code
CBC	California Building Code
CCAA	California Clean Air Act
CEQA	California Environmental Quality Act

ACRONMYS AND ABBREVIATIONS

CERCLA Act	Comprehensive Environmental Response, Compensation, and Liability
CFC	California Fire Code
CFR	Code of Federal Regulations
CLAM	Community Land Trust Association of West Marin
CRAT	Cultural Resources Awareness Training
CRLF	California red-legged frog
CSST	Certified Site Surveillance Technician
CUPA	Certified Unified Program Agency
DTSC	California Department of Toxic Substances Control
EOC	Emergency Operations Center
EOP	Emergency Operations Plan
ESA	Environmental Site Assessment
ESHA	environmentally sensitive habitat area
EV	electric vehicle
FIGR	Federated Indians of Graton Rancheria
GHGs	greenhouse gases
GMMP	Groundwater Monitoring and Mitigation Plan
gpd	gallons per day
HCP	Habitat Conservation Plan
IS/MND	initial study/mitigated negative declaration
LBP	lead-based paint
LCP	Local Coastal Program
LOS	level of service
MCM LHM	Marin County Multi-jurisdictional Local Hazard Mitigation Plan
MCOSD	Marin County Open Space District

ACRONMYS AND ABBREVIATIONS

MM	mitigation measure
NAHC	Native American Heritage Commission
NCCP	Natural Community Conservation Plans
NFIP	National Flood Insurance Program
NMWD	North Marin Water District
NPDES	National Pollutant Discharge Elimination System
OA	Operational Area
OHP	Office of Historic Preservation
OSHA	Occupational Safety and Health Administration
PG&E	Pacific Gas and Electric
PPV	peak particle velocity
PRC	Public Resources Code
PV	photovoltaic
Qpa	Pleistocene age alluvium
Qt	marine terrace
R-value	resistance value
RCRA	Resource Conservation and Recovery Act
REC	recognized environmental condition
SAR	soil application rate
SDE	Sherwood Design Engineers
SRA	State Responsibility Area
SWPPP	Stormwater Pollution Prevention Plan
TCRs	tribal cultural resources
TMDL	total maximum daily load
TMP	Traffic Management Plan
USCG	United States Coast Guard

USEPA	U.S. Environmental Protection Agency
UST	underground storage tanks
VMT	vehicle miles traveled

1 Introduction

1.1 Purpose and Use of Initial Study

The Marin County (County) Planning Division of the Community Development Agency has prepared this initial study/mitigated negative declaration (IS/MND) to provide the public, responsible agencies, and trustee agencies with information about the potential environmental effects of the proposed Coastal Permit and Conditional Use Permit to adaptively reuse and repurpose the former United States Coast Guard (USCG) site to provide affordable housing units in Point Reyes Station. This document was prepared pursuant to the requirements of the California Environmental Quality Act (CEQA) of 1970 (as amended), the CEQA Guidelines (14 California Code of Regulations [CCR] §§ 15000 et seq.), and the Marin County Environmental Impact Review Guidelines (County of Marin 1994).

This IS/MND has been prepared in accordance with CEQA. The County of Marin is the lead agency under CEQA and will consider the project's environmental impacts when considering whether to approve the project. This IS/MND is an informational document to be used in the planning and decision-making process for the project and does not recommend approval or denial of the project.

1.2 Public Review Process

Public disclosure and dialogue are priorities under CEQA. State CEQA Guidelines sections 15073 and 15105(b) require that the lead agency designate a period during the CEQA process when the public and other agencies can provide comments on the potential impacts of the project. Accordingly, the County is circulating this document for a 30-day public and agency review period.

The Draft IS/MND is available for review at the following locations:

- Marin County Community Development Agency Office (3501 Civic Center Drive, Room 308, San Rafael, California 94903)
- Point Reyes Station Library (11435 CA-1, Point Reyes Station, California 94956)

The Draft IS/MND is also available for review on the County's website under "Current CEQA Projects":

https://www.marincounty.org/depts/cd/divisions/environmental-planning/current-ceqa

All comments submitted in writing and/or by email should be received and postmarked before the date identified for closure of the public comment period in the Notice of Availability.

Comments on the Draft IS/MND should be submitted to the following contact:

Rachel Reid
Environmental Coordinator
Marin County Planning Division
3501 Civic Center Drive
San Rafael, CA 94903
Email: EnvPlanning@marincounty.org

1.3 Organization of the Document

This IS/MND contains the following components:

- Chapter 1, Introduction, provides a brief description of the intent and scope of the IS/MND, the public involvement process under CEQA, and the organization the IS/MND.
- Chapter 2, Project Description, describes the project, its location and site conditions, proposed facilities including housing and non-housing elements, project construction methods, operational requirements, and required permits and approvals.
- Chapter 3, Environmental Checklist, presents the checklist used to assess the project's potential environmental effects consistent with Appendix G of CEQA Guidelines. Chapter 3 also includes a brief description of the environmental setting for most resource topics and describes the project's anticipated environmental impacts as well as any mitigation measures (MMs) that would be required to reduce significant impacts to a less-than-significant level.
- Chapter 4, Report Preparers, provides a list of individuals who were involved in preparing the IS/MND.
- Chapter 5, References, provides a bibliography of printed references, websites, and personal communications used in preparing this IS/MND.

2 Project Description

2.1 Overview

The Community Land Trust Association of West Marin (CLAM) and Eden Housing, Inc. (Eden), referred to jointly as Applicant, have filed an application with Marin County for a Coastal Permit and Conditional Use Permit to adaptively reuse and repurpose the former USCG site to provide affordable housing units in Point Reyes Station. The proposed project would:

1. Rehabilitate existing townhomes contained in 10 two-story buildings (Buildings 101, 102, 103, 104, 201, 202, 203, 204, 205, 206) to provide 36 affordable housing units;
2. Rehabilitate and repurpose the existing "barracks" building (Building 50) to provide 15 affordable housing units;
3. Rehabilitate "Building 100A" to provide three affordable housing units;
4. Demolish existing storage building (Building 100B) and replace with landscaping and a patio area;
5. Repurpose existing mechanical shop and maintenance area (Building 100C) as a workshop and storage area;
6. Renovate and expand an existing kitchen/galley building (Building 1) to provide a resident services building including community space for the development;
7. Construct a new on-site wastewater treatment system;
8. Remove non-residential structures and provide bioretention facilities in environmentally sensitive habitat areas (ESHA)
9. Remove trees from a riparian area; and
10. Reconstruct an existing playground.

The project would result in re-parcelization of the existing lot to create additional lots within the project site to enable long-term management of the property. Marin County is the lead agency responsible for compliance with CEQA.

2.2 Project Location and Site Conditions

2.2.1 Project Location

The project site is located at 100 Commodore Webster Drive in the Point Reyes Station community within unincorporated Marin County (as shown in Figure 2.2-1). The project site consists of 33.59 acres and comprises one legal lot containing two assessor parcels (APNs: 119-240-73 and 119-236-10) at the eastern limits of Point Reyes Station. The project site is bounded by the Point Reyes Affordable Homes complex to the west, an undeveloped lot to

Figure 2.2-1 Project Location

Source: (Bay Area Open Space Council 2011a; 2011b; 2011c; USGS 2012; ESRI 2011; California Protected Areas Database 2023; ESRI 2011)

the north, and Lagunitas Creek to the east and south. The property is currently owned by the County of Marin.

2.2.2 Existing Site Facilities

The project site was developed by the USCG in 1974 for use as USCG housing and support services. The project site is currently developed with 11 residential buildings, containing 36 townhome units and 21 congregate residential rooms and 6 non-residential structures. The existing residential buildings have not been occupied since the County of Marin purchased the property in 2019. The project site also contains recreational facilities including a playground area, tennis court, basketball court, and aboveground pool and spa. The North Marin Water District (NMWD) maintains two existing potable water wells and an associated treatment facility on the project site. The project site contains belowground tanks for limited onsite sewage collection and storage. Since the site transferred ownership from the USCG to Marin County, the site has been used by local fire departments for training and wildfire emergency staging and some of the office space is being temporarily used by the County Parks Department.

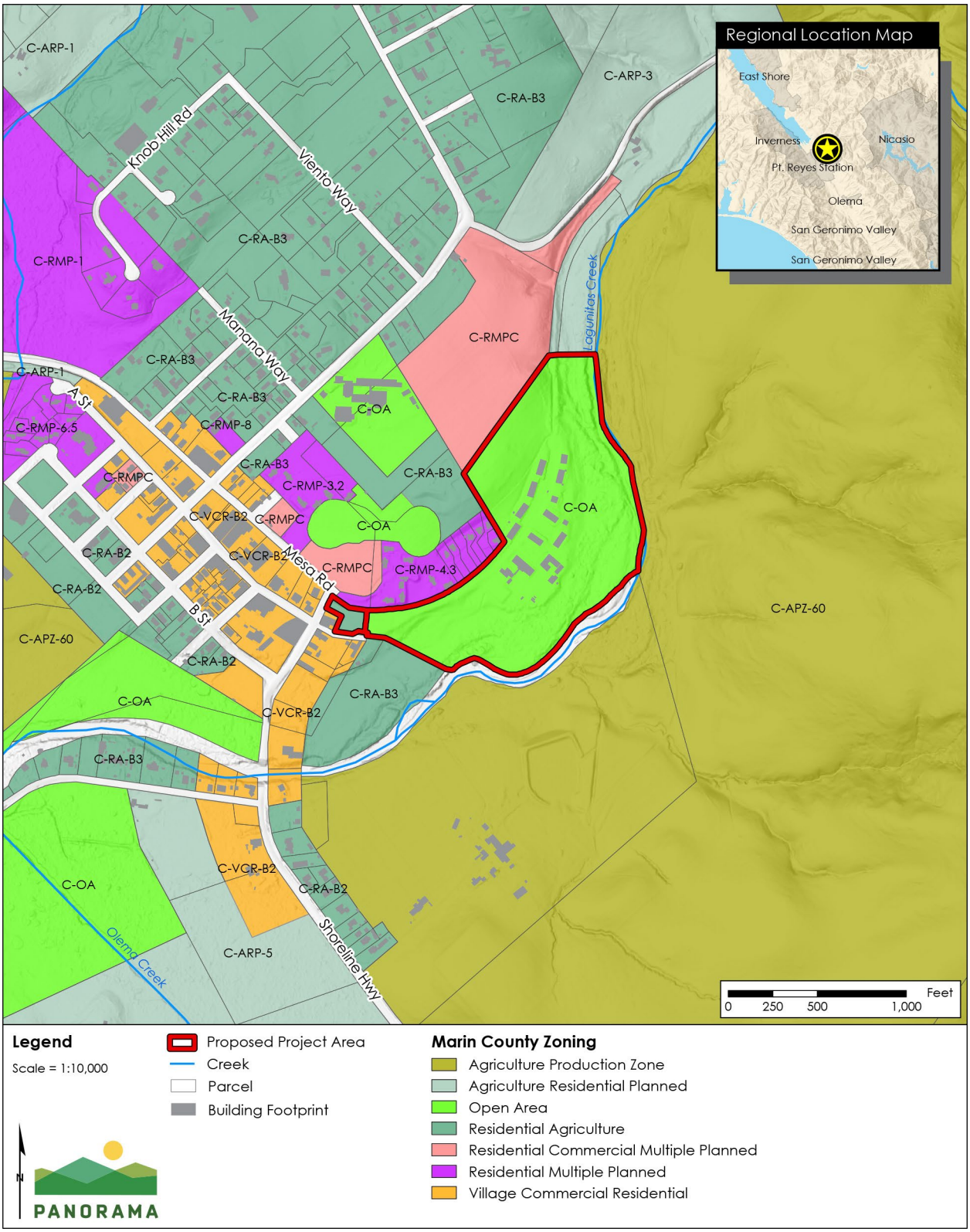
2.2.3 Land Use Designations

The project site is located within the Coastal Zone and subject to the Marin County Local Coastal Program (LCP). The purpose of the LCP is to carry out the coastal resource protection policies of the California Coastal Act of 1976. The LCP is the primary document that governs land development in the Marin County Coastal Zone. A majority of the project site is designated as C-OA-Coastal, Open Area, in the Marin Countywide Plan with a corresponding zoning designation of C-OS-Coastal, Open Space. A small portion at the western edge of the project site is designated Coastal Single Family with a corresponding zoning designation of C-RA-B3-Coastal, Residential, Agriculture. Site zoning designations are shown in Figure 2.2-2.

2.2.4 Environmentally Sensitive Habitat Areas and Buffers

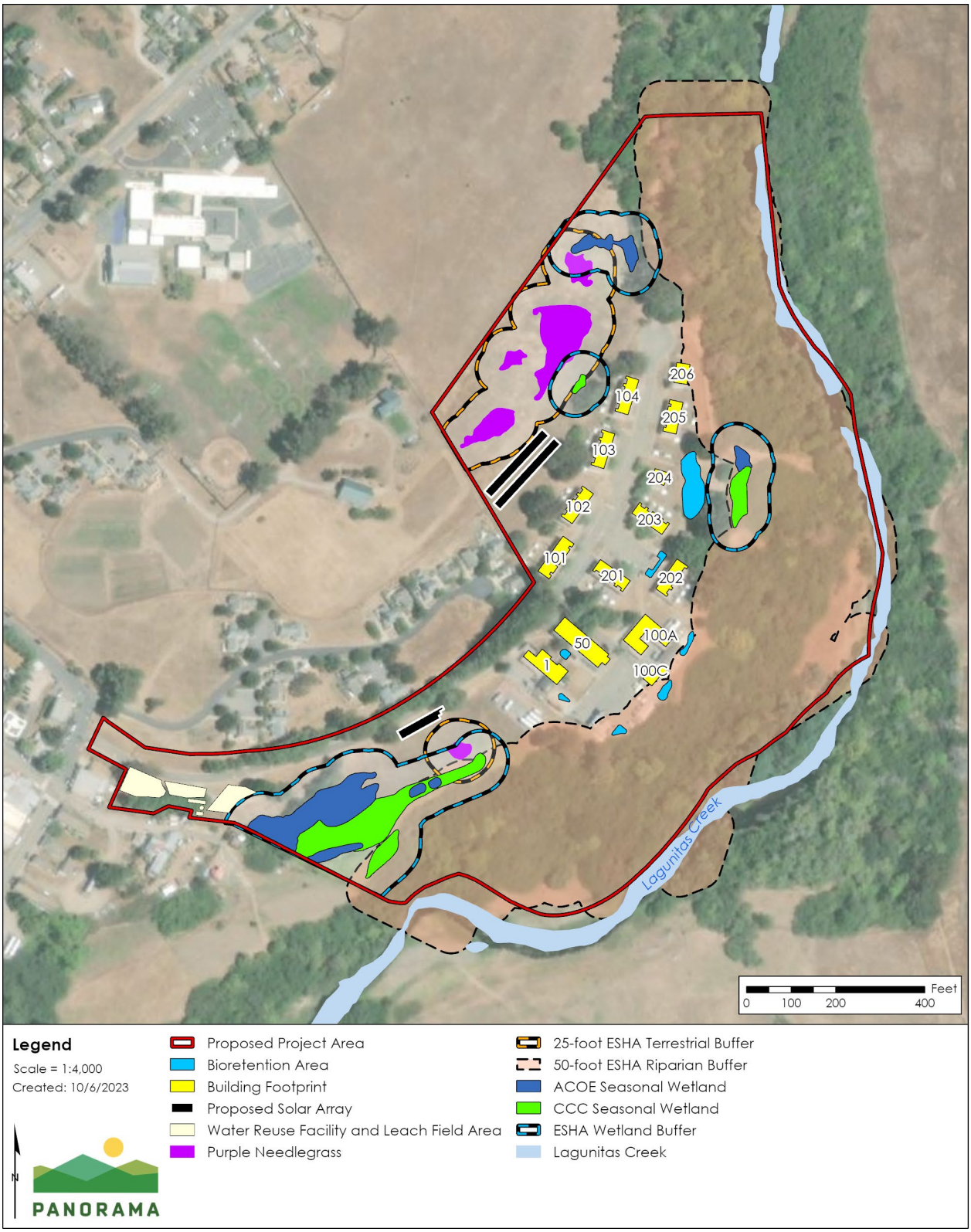
Environmentally Sensitive Habitat Areas (ESHA) are designated in the LCP as areas that contain habitats that are either rare or especially valuable because of their special nature or role in an ecosystem and that could be easily disturbed or degraded by human activities and developments (Marin County Community Development Agency 2019). The project site contains purple needlegrass grassland, which is considered terrestrial ESHA. The LCP requires a 50-foot buffer for terrestrial ESHA to prevent impacts that would significantly degrade those areas. The project site also contains two aquatic ESHAs including coastal stream and riparian vegetation ESHA and seasonal wetland ESHA. The LCP requires a 50-foot buffer from the edge of riparian vegetation associated with a coastal stream (Lagunitas Creek) and a 100-foot buffer from the periphery of seasonal wetlands. A reduced 50-foot ESHA buffer is applied to the project to protect the CCC seasonal wetland because the project area contains existing structures and uses within the 100-foot CCC seasonal wetland ESHA buffer, therefore work cannot be avoided in the 100-foot buffer area. Activities within the 100-foot CCC seasonal wetland buffer include removal of nonconforming structures and would provide a net environmental benefit. ESHA areas and buffers within the project site as well as three existing structures within the ESHA buffer are shown in Figure 2.2-3.

Figure 2.2-2 Project Site Zoning Designations



Source: (USGS 2012; Marin Map and VarGIS 2023; Marin County Community Development Agency 2023)

Figure 2.2-3 ESHA and ESHA Buffer Areas



Source: (Maxar 2021; Siegal & Strain Architects 2023)

2.2.5 FEMA Floodway

A portion of the project site west of Lagunitas Creek is located within the floodway, as detailed in maps created under the National Flood Insurance Program (NFIP). The existing and proposed habitable structures are located outside of the mapped floodway as amended by FEMA on May 5, 2023, in the Letter of Map Amendment (Appendix A). The current floodway boundary (as amended by FEMA) is shown in Figure 2.3-1.

2.3 Project Facilities

2.3.1 Buildings/Structures

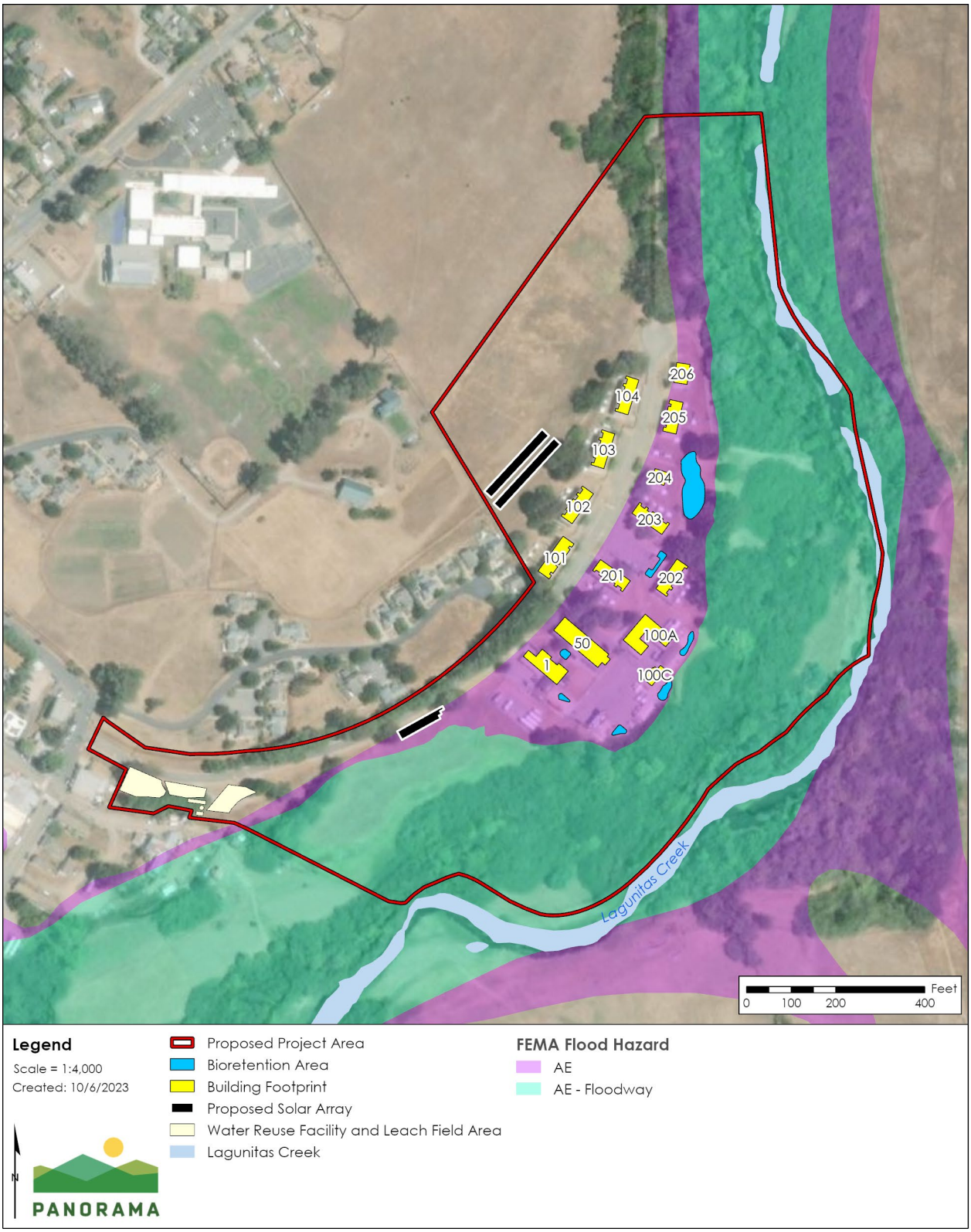
Residential Units

The Applicant proposes to rehabilitate the existing townhomes (Buildings 101, 102, 103, 104, 201, 202, 203, 204, 205, 206), dormitory building (Building 50), and administrative building (Building 100A) for affordable housing. The Project would consist of 54 housing units within the 12 existing buildings. No new housing buildings/structures would be constructed. The residential units that would be housed within each building are summarized in Table 2.3-1, below, and the location of each building is shown in Figure 2.3-1.

Table 2.3-1 Existing and Proposed Residential Buildings and Units

Existing building	Unit type	Proposed number of units	Bldg. sq. ft (existing)	Bldg. sq. ft. (proposed)	Each unit sq. ft. (proposed)
Building 101	4-bedroom	4	5,689	5,775	1,444
Building 102	3-bedroom	4	4,756	4,836	1,209
Building 103	3-bedroom	4	4,756	4,836	1,209
Building 104	3-bedroom	4	4,756	4,836	1,209
Building 201	3-bedroom	4	4,756	4,836	1,209
Building 202	3-bedroom	4	4,756	5,072	1,268
Building 203	3-bedroom	4	4,756	4,836	1,209
Building 204	2-bedroom	2	1,808	1,854	927
Building 205	4-bedroom	3	4,284	4,354	1,451
Building 206	2-bedroom	3	2,750	2,808	936
Building 100A	3-bedroom	3	4,139	3,512	1137 to 1242
Building 50	1-bedroom	15	9,386	10,246	675
Total	**All**	**54**	**56,592**	**57,801**	

Figure 2.3-1 FEMA Floodway



Source: (Maxar 2021; Siegal & Strain Architects 2023; FEMA, n.d.)

Non-Residential Units

Three non-residential buildings currently occur on the site. One of the non-residential buildings would be demolished (Building 100B), and two non-residential buildings (Building 1 and Building 100C) would be repurposed to provide a property management and resident services office and community space for residents of the project. Details for demolition or reuse of each non-residential building are summarized in Table 2.3-2. Building 1 would include offices for property management, resident services, and property maintenance facilities. The building will also include an approximately 1,000-square-foot community room to accommodate resident parties, meetings, classes, workshops, and occasional community events.

Table 2.3-2 Existing and Proposed Non-residential Buildings

Building	Bldg. sq. ft. (existing)	Bldg. sq. ft. (proposed)	Description
Building 100B	1,126	0	Demolish existing storage building and replace with landscaping and patio area.
Building 100C	1,158	1,123	Repurpose existing mechanical shop and maintenance area as a workshop and storage area.
Building 1	1,822	3,528	Convert existing kitchen and dining hall to community room, property management and resident services office.
Total	**4,106**	**4,651**	

A small kitchenette, storage room, and restrooms would be located adjacent the community room. In addition, a 300-square-foot library/computer room would be available to residents. Building 1 could serve as a neighborhood-level resilience center to provide shelter and resources during extreme weather events and other emergencies.

Accessory Structures

A shed, covered patio, pergola, pool, spa, and tennis court, currently occur on the site. The shed, covered patio, pool, spa, and tennis court would be demolished, and the pergola would remain. The project would result in a net removal of impervious surfaces due to removal of accessory structures in proximity to the riparian corridor.

2.3.2 Site Circulation and Parking

Access to the project site would be provided by Mesa Road, immediately east of the intersection of Mesa Road and State Highway 1. Internal vehicular circulation is provided by Commodore Webster Drive, an asphalt-paved, two-lane private road that terminates at the southeastern end of the project site.

The project would provide 119 parking spaces, including eight ADA-compliance spaces and 24 electric vehicle spaces. Parking for the townhomes would be provided in front of each townhome (Buildings 101 to 206) along Commodore Webster Drive. Parking for Building 50

and 100A would be provided in a common parking lot adjacent the buildings. Parking for property management and resident services in Building 1 and for the workshop in 100C would also be provided in a common parking lot adjacent to those buildings. The number of parking spaces and parking stall dimensions have been designed to meet parking requirements provided in Marin County Municipal Code Section 24.04.340-A. Driveways and access points would comply with all County fire safety standards to maximize entry and egress space for emergency vehicles. Parking for the project would be provided on existing impervious areas.

Both long-term and short-term bicycle parking would be provided on-site. A total of 62 long-term and 44 short-term bicycle parking spots will be provided. Most of the long-term bike parking would be provided by storage sheds available to each unit while short-term parking would be provided by bike racks throughout the project site.

2.3.3 Utilities and Public Service

Wastewater Treatment Facility

Sewer service is not available in the project area. The project site currently contains belowground tanks for limited on-site sewage collection and storage only. When the property was used for USCG housing, wastewater was collected and transported to an offsite facility for disposal on a daily basis.

The project would be served by a newly constructed wastewater treatment facility, subsurface drip irrigation system, and leach field. The wastewater treatment system would be located on the southwest edge of the project site, near the entrance on Commodore Webster Drive. The wastewater treatment system would consist of a Membrane Aerated Biofilm Reactor, which would be housed in a combination of underground tanks, aboveground container, treatment building, and storage tank. The wastewater system would accommodate up to 10,000 gallons of wastewater per day and serve the entire project.[1] The primary mode of wastewater dispersal during the dry season would be through subsurface drip irrigation lines located throughout much of the project site. A leach field of 0.22 acre and a 10,000-gallon aboveground storage tank would be located adjacent the treatment system, south of Commodore Webster Drive (as shown

[1] The estimated average daily wastewater flow is 9,500 gallons per day (gpd). The equalization tank, which stores wastewater, is sized for 5,000 gpd, or approximately half a day of flow. The recycled water storage tank would store treated effluents and is sized to provide slightly more than 1 day of recycled water storage, or 10,000 gallons. Recycled water could be used for toilet flushing in community area restrooms, which would need to be dual-plumbed. This would represent a demand of approximately 300 to 400 gpd. The reuse opportunity that is part of the current design is irrigation via a subsurface drip system, which is sized for 100 percent of wastewater flows and also provides another method of disposal during dry weather. The leach field has capacity to dispose of 200 percent of effluent, and the design does not assume a portion is used for irrigation.

in Figure 2.2-3). The water treatment system would be connected to the proposed micro-grid and back up emergency generator to ensure consistent power supply.

2.3.4 Electricity and Community Solar System

Electricity to the project site is provided by Pacific Gas and Electric (PG&E). The proposed residential units would be all electric; no gas appliances are proposed. The conversion of the project to all-electric use would require upgrades to the electrical infrastructure. Existing underground PG&E powerlines connecting to each building would remain. However, existing electrical metering panels would be replaced with a new exterior residential multi-meter panel. In addition, the three existing PG&E in-ground transformer vaults within the project site would be upgraded to accommodate the all-electric load.

Rooftop solar is proposed on all buildings, and two ground-mounted solar arrays are proposed along the east side of Commodore Webster Drive and on the hillside west of Buildings 101, 102, and 103 (as shown in Figure 2.2-3). The proposed 558,000 kilowatt-hour (kWh) solar photovoltaic (PV) system has been sized to offset 100 percent of the projected energy consumption of the project, including all-electric residences, the resident services building, a wastewater treatment plant, and electric vehicle (EV) charging loads. The ground-mounted PV panels would be approximately seven feet in height. An 80-kilowatt (-kW) battery energy storage system (BESS) and backup diesel generator are proposed between Buildings 1 and 50. A microgrid consisting of a portion of the PV system, a BESS, a generator, and the related electrical infrastructure would provide power to Building 1 and the wastewater treatment plant. The microgrid would allow Building 1 to serve as a neighborhood-level resilience center to provide shelter and resources during extreme weather events and other emergencies.

Telecommunication

The existing telecommunication facilities at the site would remain; no improvements are proposed.

Water

Potable water is provided to the site by the NMWD. The project has an anticipated water demand of 9,500 gallons per day (gpd). NMWD obtains its water supply for the West Marin service area from two wells located on the nearby Gallagher Ranch and from two wells located on the project site.

Fire sprinklers would be added to the ADA-compliance mobility units in Buildings 202 and 204, Building 50, and Building 1. New fire-water lines would be installed to service the sprinkler system.

Stormwater

The project is considered a regulated project according to the Bay Area Stormwater Management Agencies Association (BASMAA) Post-Construction Manual because it creates or replaces more than 5,000 square feet of impervious surface. Therefore, it must comply with the statewide Phase II municipal stormwater National Pollutant Discharge Elimination System (NPDES) permit. The project would implement runoff reduction measures including limiting

clearing, grading, and soil compaction, minimizing impervious surfaces, conserving natural areas, complying with ESHA buffer requirements, and using a combination of LID and BMPs to improve the water quality of runoff from the site compared to existing conditions. The project would utilize existing underground infrastructure where possible, and storm drain outlet pipes would be intercepted and routed to six new bioretention facilities throughout the project site to provide treatment of existing and proposed impervious surfaces. In addition, the existing mulched playground would be converted into a self-retaining area that would accept runoff from the uphill site to allow for infiltration into the ground. The proposed bioretention facilities and self-retaining area are shown in Figure 2.2-3.

2.3.5 Landscaping and Recreation

Landscaping

The project would require removal of 38 mature trees, all of which are non-native ornamental species and are not subject to the Marin County LCP list of Heritage Trees (see Table 2.3-3). The trees that would be removed are predominantly eucalyptus, dead trees, and other ornamental trees. The locations of trees to be removed are shown in Figure 2.3-2.

The proposed landscaping would use Marin-native and water-wise plants in landscape zones and raised garden beds. The total number of trees proposed for planting and removal by type are summarized in Table 2.3-3. Irrigation would be provided by recycled water from the on-site wastewater treatment system; no potable water from NMWD would be used. All landscaping would comply with required defensible space by Marin County Fire Department. All areas temporarily affected by grading would be revegetated with native plants. The plant palette is provided in Appendix B.

Recreation

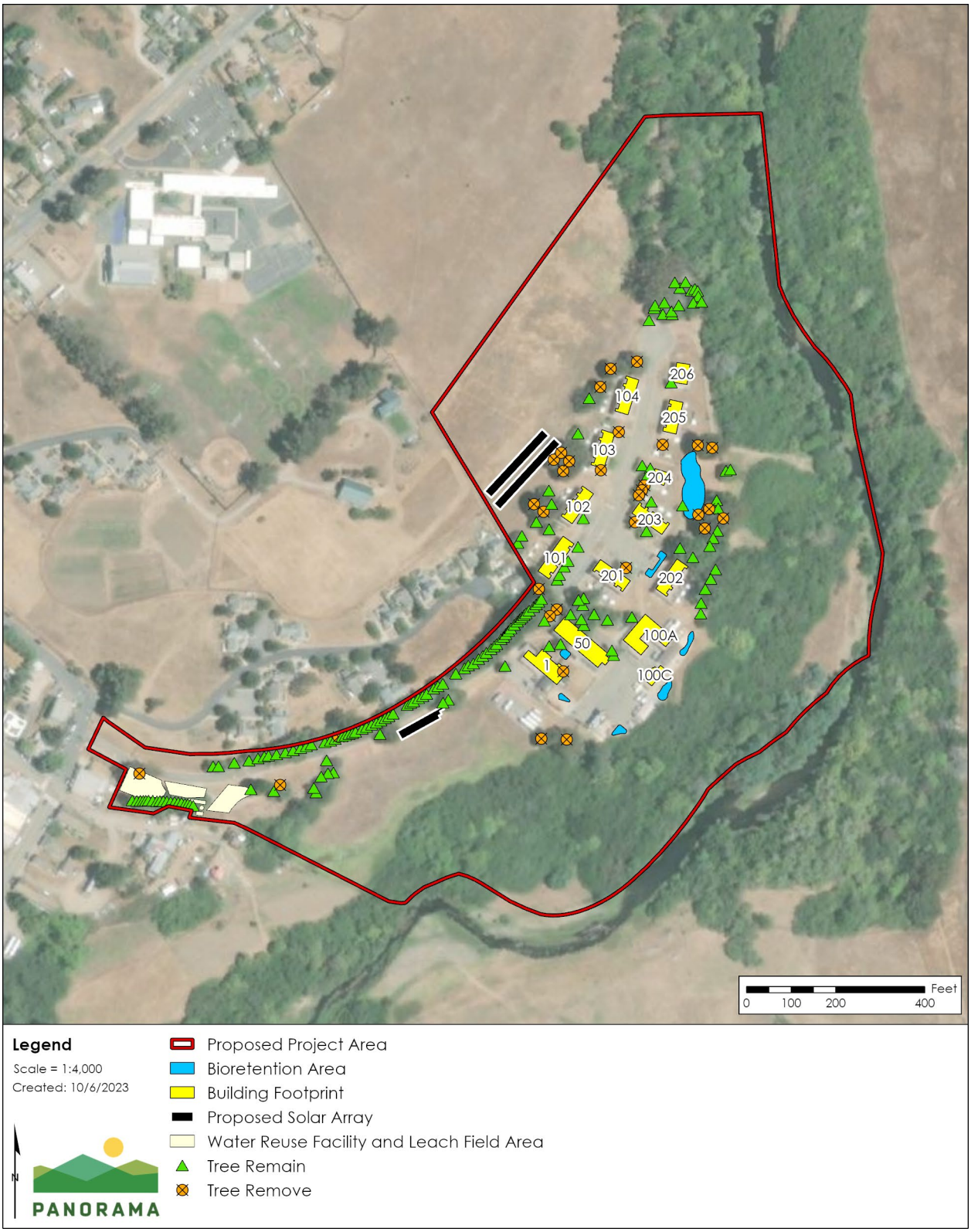
The existing aboveground pool and spa at the project site would be demolished and replaced with a new playground, multi-sport court, pathways, and resident gathering areas. The existing tennis court would be removed and regraded to natural conditions and planted with native species to improve ecological functions, permeability, and drainage. The half-basketball court would be replaced with pathways, parking, and improved drainage features.

Table 2.3-3 Trees Proposed for Removal and Planting

Common name	Species name	Number of trees
Removed		
Green wattle	*Acacia decurrens*	1
Silver maple	*Acer saccharinum*	1
Alder	*Alnus Sp.*	1
Leyland cypress	*Cupressus x leylandii*	4
Dwarf blue gum	*Eucalyptus globlulus 'Compacta'*	13
Blue gum eucalyptus	*Eucalyptus globulus*	2
Flooded gum	*Eucalyptus grandis*	1
Narrow-leaved black peppermint	*Eucalyptus nicholii*	1
Red box	*Eucalyptus polyanthemos*	1
Manna gum	*Eucalyptus viminalis*	3
Mayten	*Maytenus boaria*	3
Lemonwood	*Pittosporum eugenioides*	4
Dead pine		3
Total removed		**38**
Planted		
Big leaf maple	*Acer macrophyllum*	2
Box elder	*Acer negundo*	5
Red alder	*Alnus ruba*	9
Service berry	*Amelanchier spp.*	11
Mountain mahogany	*Cercocarpus*	8
Oregon ash	*Fraxinus latifolia*	8
Bishop pine	*Pinus muricata*	1
Coast redwood	*Sequoia sempervirens*	2
California bay	*Umbellularia californica*	1
Total planted		**47**
Net change		**+9**

Source: ("L2.00_TREE PLANTING PLAN-Annotated Set (2).Pdf," n.d.)

Figure 2.3-2 Existing Trees and Trees for Removal



Source: (Maxar 2021; Siegal & Strain Architects 2023)

2.4 Project Construction

2.4.1 Construction Schedule

Project construction is anticipated to last 1 to 2 years. Construction would occur between the hours of 7 a.m. and 6 p.m. on Monday through Friday and between the hours of 9 a.m. and 5 p.m. on Saturday. No work would occur on Sundays and Holidays (New Year's Day, President's Day, Memorial Day, Independence Day, Labor Day, Thanksgiving Day, and Christmas Day)..

Construction would include demolition and excavation of areas of the project site for utility and infrastructure improvements, construction of wastewater infrastructure, removal of hardscape, and demolition of existing structures.

2.4.2 Access and Staging

Work crew would be expected to travel to the project site from areas east of the project area. The project site would be accessed via surrounding existing roads, including State Route 1 and Point Reyes Petaluma Road. Project staging and storage areas would be located within the project site.

2.4.3 Equipment and Personnel

Construction of the project would include typical heavy construction equipment including, but not limited to excavators, backhoes, bobcats, manlifts, and extension forklifts. A detailed list of proposed construction equipment is provided in Table 2.4-1, below. A maximum of 30 workers would be required for the project construction at any given time. Approximately 160 truck trips would be required for importing and exporting of material during construction.

Table 2.4-1 Estimated Construction Equipment

Construction phase	Equipment	Quantity	Usage
Demolition	Excavators	2	8 hours for 1 month
	Bobcat tracked	1	8 hours for 1 month
Grading	Excavators	2	8 hours for 3 months
	Bobcat tracked	1	8 hours for 3 months
	Loaders	3	8 hours for 2 months
Building construction	Forklifts (boom)	1	8 hours for 12 months
	Manlifts	2	8 hours for 12 months
Paving	Pavers	1	8 hours for 1 month
	Paving equipment	1	8 hours for 1 month
Architectural coating	Air compressors	1	8 hours for 6 months

2.5 Operation and Maintenance

The project includes resident services and property management, which would be located in Building 1, to support the project residents. It is anticipated that an average of three employees, with a maximum of seven employees, would be on site at any one time. Two property management and maintenance employees would be onsite seven days a week, and one resident services employee will be on site four days a week. The property management office would be open from 8 a.m. to 4 p.m. Monday through Friday.

It is anticipated that in addition to regular resident activities, approximately four amplified special events would occur each year. Additional temporary portable toilets would be brought to the project site as needed for large special events.

2.6 Agency Jurisdiction and Approvals

Construction and operation of the project are anticipated to require permits and approvals listed in Table 2.6-1.

Table 2.6-1 Potentially Required Permits and Approvals

Permit	Agency	Function
National Environmental Policy Act	Housing and Urban Development	Required prior to authorization of federal funding
Section 7 Consultation and Biological Opinion	U.S. Fish and Wildlife Service	Potential to affect California red-legged frog
Section 106 Consultation	State Historic Preservation Officer	Concurrence of determination of effect on historic properties
Coastal Development Permit	Marin County	Development of housing units and major vegetation removal within ESHA
Report of Waste Discharge and Form 200 and a Title 22 Engineering Report	San Francisco Bay Regional Water Quality Control Board	Wastewater treatment system
Construction Stormwater General Permit	State Water Resources Control Board	Disturbance of more than 1 acre of land
Conditional Use Permit	Marin County	Development of affordable housing
Building Permit	Marin County	Rehabilitation and demolition of existing buildings and structures

This page is intentionally blank.

3 Environmental Evaluation

3.1 Project Summary

1.	Project title	Point Reyes Station USCG Coastal Permit and Conditional Use Permit
2.	Lead agency name and address	County of Marin Community Development Agency Planning Division 3501 Civic Center Drive, Suite 308 San Rafael, CA 94903
3.	Contact person and phone number	Rachel Reid, Environmental Planning Manager 415-473-6863
4.	Project location	100 Commodore Webster Drive APNs: 119-240-73 and 119-236-10
5.	Project sponsor's name and address	Community Land Trust Association of West Marin (CLAM) and Eden Housing, Inc. (Eden)
6.	General plan designation	Coastal Open Space (C-OS) and Rural/Residential Coastal Zone (C-SF4)
7.	Zoning	C-OA-Coastal, Open Area and C-RA-B3 - Coastal, Residential Agricultural
8.	Description of the project	The Applicant would adaptively reuse and repurpose the former USCG site to provide affordable housing units in Point Reyes Station. The proposed project would: 1) Rehabilitate existing townhomes contained in 10 two-story buildings (Buildings 101, 102, 103, 104, 201, 202, 203, 204, 205, 206) to provide 36 affordable housing units; 2) Rehabilitate and repurpose the existing "barracks" building (Building 50) to provide 15 affordable housing units; 3) Rehabilitate "Building 100A" to provide 3 housing units; 4) Renovate and expand an existing kitchen/galley building (Building 1) to provide a resident services building including community education space; 5) Construct a new on-site wastewater treatment system; 6) Remove non-residential structures and provide bioretention facilities in environmentally sensitive habitat areas (ESHA); 7) Remove trees from a riparian area; and 8) Reconstruct an existing playground.

9. Surrounding land uses and setting	Residential land uses to the west, an undeveloped lot to the north, and Lagunitas Creek to the east and south.
10. Other public agencies whose approval is required	U.S. Department of Housing and Urban Development (HUD), United States Fish and Wildlife Service (USFWS), State Historic Preservation Officer (SHPO), San Francisco Regional Water Quality Control Board, State Water Resources Control Board.
11. Native American consultation	The County of Marin sent a letter to Federated Indians of Graton Rancheria (FIGR) in August 2023. On September 1, 2023, FIGR Tribal monitor and archaeological consultant (Sally Evans; Evans & De Shazo, Inc.) conducted a pedestrian field survey. The results of the archaeological survey were provided to FIGR on October 16, 2023, and a consultation meeting was held with FIGR on October 16, 2023.

3.1.1 Environmental Factors Potentially Affected

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

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

3.1.2 Approach to Environmental Analysis

This IS checklist evaluates the potential environmental impacts of the project. The level of significance for each resource topic is determined by considering the predicted magnitude of the impact. Four levels of impact significance are evaluated in this IS checklist:

No Impact. The project would not have the impact described. The project may have a beneficial effect, but there is no potential for the project to create or compound the impact described.

Less Than Significant Impact. The project would have the impact described, but the impact would not be significant. Mitigation is not required; however, the project applicant may choose to modify the project to avoid the impacts.

Less Than Significant with Mitigation. The project would have the impact described, and the impact could be significant. One or more mitigation measures have been identified that will reduce the impact to a less-than-significant level.

Potentially Significant Impact. The project would have the impact described, and the impact could be significant. The impact cannot be reduced to a less-than-significant level by incorporating mitigation measures. An environmental impact report must be prepared for this project.

3.2 Environmental Checklist

3.2.1 Aesthetics

Environmental Impacts	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
1. AESTHETICS. Except as provided in Public Resources Code Section 21099, would the project:				
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☐	☒
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway?	☐	☐	☐	☒
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage points). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

Environmental Setting

Scenic Vistas

There are no designated scenic vistas identified in the Marin Countywide Plan or Local Coastal Program. The nearest designated scenic vista is along the Sunset Overlook Trail, which is located 4.1 miles northwest of the project site, and the scenic vista is not overlooking the project site.

Scenic Highways

State Highway 1 from the southern limit of Highway 1 in Marin County to Mendicino County is identified by the California Department of Transportation (Caltrans) as an "eligible" State scenic highway (Caltrans 2019). For CEQA purposes, an eligible State scenic highway is considered the same as a designated scenic highway to prevent visual degradation that may prevent future designation. The project site is located approximately 120 feet east of the intersection of State Highway 1 and is not visible from State Highway 1 due to dense riparian vegetation and mature trees along Highway 1 in proximity to the project site.

Public Views of the Site

Views of the project site from publicly accessible vantage points are limited due to mature trees and vegetation along neighboring streets around the project area, a hill slope to the north of the project area, and Lagunitas Creek riparian corridor. The project site is visible from Commodore Webster Drive as you enter the project area but has very limited visibility from neighboring public roads due to intervening topography, other residential structures, and vegetation. A portion of the project site is partially visible from the neighboring cul-de-sac and residential area but screened by mature trees at the east end of Giacomini Boulevard. The east end of Giacomini Boulevard provides access to a few residential homes but would not attract a lot of viewers as the road does not continue past the homes adjacent the cul-de-sac.

Coastal Act Protection of Visual Quality

The Coastal Act mandates that scenic and visual qualities of the coast shall be considered and protected as a resource of public importance. The LCP includes several policies requiring the protection of scenic quality and views of the natural environment (County of Marin 2019a).

- **Policy C-DES-3 Protection of Ridgeline Views.** Require new development proposed on or near visually prominent ridgelines to be grouped below the ridgeline on the least visually prominent portion of the site. Prohibit new development on top of, within 300 feet horizontally, or within 100 feet vertically of visually prominent ridgelines, whichever is more restrictive, if other suitable locations are available on the site. If structures must be placed within this restricted area because of site size or similar constraints, they shall be in locations that are least visible from public viewing areas, shall be sited and designed to limit public view impacts to the maximum extent feasible (including through landscaping and screening), and shall not exceed 18 feet in height.
- **C-DES-4 Limited Height of New Structures.** Limit new construction to a maximum height of 25 feet:
- **C-DES-8 Protection of Trees.** Site structures and roads to avoid removal of trees that contribute to the area's scenic and visual resources, except where required to maintain defensible space for structures or eliminate diseased trees that threaten surrounding structures or vegetation and where removal is otherwise consistent with LCP policies. Dead trees may serve as valuable habitat for some species, so avoid complete removal where appropriate.

Discussion

a) Would the Project have a substantial adverse effect on a scenic vista?

The nearest scenic vista to the project site is located approximately 4.2 miles from the project site and does not overlook the project site. The project site is not located on or near any ridgeline. The project is set in a low-lying area adjacent Lagunitas Creek and is generally shielded from view by the hillslope to the north of the project and dense mature riparian vegetation to the south, west, and east of the project. Because the project is not visible from any scenic vista and would not block views of any scenic areas, the project would have no impact on scenic vistas.

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

The project site is not visible from Highway 1 due to intervening structures and topography between Highway 1 and the project site. Because the project site is not visible from any state scenic highway, the project would have no impact.

c) Would the Project substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage points). In an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

The visual character of the project area and surroundings include hillsides, Lagunitas Creek and associated riparian corridor, and residential uses. The project would rehabilitate existing townhomes, a dormitory building, and an administrative building for affordable housing. The rehabilitation of the existing buildings would not increase the height of any structure and all structures would remain less than 25 feet in height, consistent with the zoning and LCP policy C-DES-4. The project would include rooftop solar and ground-mounted solar located along Commodore Webster Drive and along the hillside west of Buildings 101, 102, and 103. The area of the proposed ground-mounted solar is not visible from any public vantage point due to the angle of the hill slope, which directs views of the solar panels to areas within the project site. While the project would involve removal of some trees within the site, the project would also involve planting of more trees than would be removed. The area along Lagunitas Creek would remain densely planted and trees would continue to line Commodore Webster Drive. The proposed wastewater treatment facility would be located near the west entrance to the site, and the water tank, the tallest new facility, would be approximately 13.9 feet tall. The ground-mounted solar arrays would be approximately 7 feet in height. Because the project area has minimal visibility from any public vantage point and the project would not change the height of any buildings, the project would have a less-than-significant impact on visual quality from any public vantage point.

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

The project area currently contains overhead lighting on Commodore Webster Drive and there are lights on the existing buildings. Rehabilitation of the buildings would include replacement of lighting and installation of new lighting to comply with Marin County Code Section 24.04.410, which requires open residential parking areas to provide exterior lighting to provide a safe level of illumination for pedestrian walkways. Any new exterior parking lighting would be shielded to not produce light on adjoining properties, and all lighting would comply with current California Building Code (CBC) requirements for energy efficiency. Because the new lighting would replace existing lighting, it would not create a new source of substantial light, and the impact from lighting would be less than significant.

The solar panels could potentially generate glare at certain seasons and certain viewing angles. The solar panels would be directed towards the south and towards the project area and would be screened from view from other areas by hill slope and dense riparian vegetation. As the solar panels would not be visible from areas outside of the project site, the solar panels would not generate substantial glare that would adversely affect views. The impact from glare would be less than significant.

Mitigation Measures

None required.

3.2.2 Agricultural and Forestry Resources

Environmental impacts	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
2. AGRICULTURE AND FORESTRY RESOURCES. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project, and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220[g]), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104[g])?	☐	☐	☐	☒
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

Discussion

a) Would the Project Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

The proposed project site does not support agriculture uses. The proposed project is located in a developed area in Point Reyes in west Marin County. The project site is bounded by the Point Reyes Affordable Homes to the west, an undeveloped lot to the north, and Lagunitas Creek to the east and south. Parcels south of Lagunitas creek are zoned for agricultural use. The

proposed project site does not contain any lands designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Department of Conservation (CDOC 2016). The proposed project site is designated "Urban and Built-Up Land," which is not an agricultural designation (CDOC n.d.). Lands to the south of Lagunitas Creek are designated as Farmland of Local Importance. The project would not affect agricultural zoning or productivity of areas mapped as Farmland of Local Importance on parcels south of Lagunitas Creek as the project is separated from the agricultural areas and would not affect agricultural use of those areas. . No impact on Farmland, agricultural zoning, or a Williamson Act contract would occur.

b) Would the Project conflict with existing zoning for agricultural use, or a Williamson Act contract?

Refer to Response a), above. The project site was previously developed by the USCG with housing. The project site is not currently used for agriculture uses, and there are no Williamson Act contracts on the property. No impact would occur.

c) Would the Project Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?

No land within the proposed project area is zoned as forest land or timberland. Thus, the proposed project would not conflict with zoning of lands that have a Timberland Preserve designation. The site is not identified as having timber resources in the Marin Countywide Plan (County of Marin 2007) and would not conflict with any zoning for timber resources.

d) Would the Project result in the loss of forest land of conversion of forest land to non-forest use?

Refer to Response c), above. The project site does not currently support forest land or timberlands. While the proposed project would result in removal of individual trees, the removal of individual trees from the site would not constitute loss or conversion of forest land as the trees do not occur in areas that meet the definition of a forest. Thus, implementation of the project would not result in the loss of forest land or conversion of forest land to non-forest use. No impact would occur.

e) Would the Project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?

Refer to Response a), above. The project site is currently developed with residential uses. The proposed project site does not support agriculture or forest uses. The project would not affect agricultural production or use of nearby agricultural parcels south of Lagunitas Creek. Therefore, the project would not involve other changes in the existing environment which, due

to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use. No impact would occur.

Mitigation Measures

None required.

3.2.3 Air Quality

Environmental Impacts	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
3. AIR QUALITY. Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	☒	☐
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

Environmental Setting

Air Basin

Marin County is within the San Francisco Bay Area Air Basin. The Bay Area Air Quality Management District (BAAQMD) is responsible for air quality management and regulates activities that may affect air quality within the Bay Area Air Basin.

Air Quality

Federal Standards

The U.S. Environmental Protection Agency (EPA) is responsible for setting National Ambient Air Quality Standards (NAAQS) under the Clean Air Act (CAA). National primary standards "provide public health protection, including protecting the health of 'sensitive' populations such as asthmatics, children, and the elderly." National secondary standards "provide public welfare protection, including protection against decreased visibility and damage to animals, crops, vegetation, and buildings" (EPA 2023).

State Standards

The California Air Resources Board (CARB) is the State agency responsible for regulating mobile-source (vehicle) emissions and overseeing the activities of local air pollution control districts. CARB has established California Ambient Air Quality Standards (CAAQS) for all federally regulated pollutants in addition to sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particles. The State standards generally are more stringent than the federal standards. Areas have been designated as being in attainment, nonattainment, or unclassified with respect to State ambient air quality standards under the California Clean Air Act (CCAA). As shown in Table 3.2-1, below, the San Francisco Bay Area Air Basin is in compliance with

state and federal air quality standards, with the exception of ozone and particulate matter (PM_{10} and $PM_{2.5}$).

Table 3.2-1 Ambient Air Quality Standards and San Francisco Bay Area Air Basin Attainment Status

Pollutant	Averaging Time	State Standard		National Standard	
		Concentration	Attainment Status	Concentration	Attainment Status
Ozone (O_3)	1-Hour	0.09 ppm	**Nonattainment**	–	–
	8-Hour	0.070 ppm	**Nonattainment**	0.07 ppm	**Nonattainment**
Carbon monoxide (CO)	1-Hour	20 ppm	Attainment	35 ppm	Attainment
	8-Hour	9.0 ppm	Attainment	9 ppm	Attainment
Nitrogen dioxide (NO_2)	1-Hour	0.18 ppm	Attainment	0.1 ppm	Attainment
	Annual	0.030 ppm	Attainment	0.053 ppm	Attainment
Sulfur dioxide (SO_2)	1-Hour	0.25 ppm	Attainment	0.075 ppm	Attainment
	24-Hour	0.04 ppm	Attainment	--	Attainment
Respirable particulate matter (PM_{10})	24-Hour	50 µg/m^3	-	150 µg/m3	Unclassified
	Annual	20 µg/m^3	**Nonattainment**	–	–
Fine particulate matter ($PM_{2.5}$)	24-Hour	–	**Nonattainment**	35 µg/m^3	**Nonattainment**
	Annual	12 µg/m3	**Nonattainment**	12 µg/m^3	Unclassified/ attainment
Lead (Pb)	30-day average	1.5 µg/m3	Attainment	–	Attainment
	3-month rolling	–	Attainment	0.15 µg/m^3	Attainment

Notes:
ppm = parts per million; µg/m^3= micrograms per cubic meter

If the air quality meets or is cleaner than the state or national standard, it is designated "attainment"; areas that don't meet the state or national standard are designated "nonattainment" and are shown in bold. In some cases, EPA is not able to determine an area's status after evaluating the available information and those areas are designated "unclassified."

Source: (BAAQMD 2017)

Air Quality Emission Thresholds

BAAQMD's 2022 *CEQA Guidelines* provide air quality significance thresholds for volatile organic compounds (VOC), carbon monoxide (CO), oxides of nitrogen (NO_x), oxides of sulfur (SO_x), and PM_{10} to determine where air emissions generated during project construction and operation would be significant, as shown in Table 3.2-2 (BAAQMD 2022).

Table 3.2-2 Air Quality Thresholds of Significance

Pollutant	Construction emissions threshold of significance (lbs./day)	Operation emissions threshold of significance (lbs./day)
ROG	54	54
NO_x	54	54
PM_{10}	82 (exhaust)	82
$PM_{2.5}$	54 (exhaust)	54
PM_{10}/ $PM_{2.5}$	Best management practices	None
Local CO	None	9.0 ppm (8-hour average)

ppm = pounds per day; CO = carbon monoxide; NO_x = oxides of nitrogen; PM_{10} = particulate matter less than 10 microns in aerodynamic diameter; ROG = reactive organic gases

Source: (BAAQMD 2022)

Discussion

a) Would the Project conflict with or obstruct implementation of the applicable air quality plan?

The project is located within the San Francisco Bay Area Air Basin, which is within BAAQMD. BAAQMD adopted the Bay Area Clean Air Plan in April 2017, which is the applicable air quality plan within the San Francisco Bay Area Air Basin (BAAQMD 2017b). The project consistency with the Bay Area Clean Air Plan is summarized in Table 3.2-3. As summarized in the table, the project would be consistent with all applicable air quality control measures contained in the Bay Area Clean Air Plan and the project would not conflict with or obstruct implementation of the plan. The impact from conflict with an applicable air quality plan would be less than significant.

Table 3.2-3 Consistency with Bay Area Clean Air Plan

Control Strategies	Consistency
Stationary source measures	The project does not include any stationary sources of emissions.
Transportation	The transportation control measures are applicable at a regional agency scale and not at a project scale.
Energy	The project includes solar energy generation, and the buildings would be all electric and comply with current CBC requirements. The project would be consistent with the energy control measures.
Buildings	The buildings would be constructed consistent with current CBC requirements. The project would be consistent with the building control measures.
Agriculture	The project is not an agricultural use, and the measures would not apply to the project.

Control Strategies	Consistency
Natural and working lands	The project would avoid development in any wetland areas and would plant more trees than would be removed. The project would be consistent with the natural and working lands measures.
Water	The project would use recycled wastewater for landscape irrigation to reduce water use. The project would be consistent with the water conservation control measures.

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

Construction

The proposed project would require the temporary use of equipment for grading, demolition, and construction, which would generate air emissions. Equipment that would be used during construction of the project is summarized in Table 2.4-1. A maximum of 30 workers would be required for the project construction at any given time. Approximately 160 truck trips from construction equipment and vehicles would occur daily during construction. Emissions of ozone precursors ROG and NO_x would primarily be generated from construction equipment exhaust and mobile sources and would vary as a function of the number of daily vehicle trips, the types and number of heavy-duty, off-road equipment used, and the intensity and frequency of their operation. The current version of the California Emissions Estimator Model (CalEEMod) was used to quantify construction-related and operational emissions for the project. CalEEMod is a statewide land use emissions model developed by the California Air Pollution Control Officers Association in collaboration with California air districts to quantify potential criteria air pollutant and precursor and greenhouse gas emissions associated with construction and operations from land use projects. The air emissions modeling results are provided in Appendix C.

Consistent with BAAQMD CEQA Guidelines, the project's individual contribution to criteria air pollutants would be cumulatively considerable if it exceeded the BAAQMD thresholds provided in Table 3.2-2. The average daily construction period emissions (i.e., total construction period emissions divided by the number of construction days) were compared to the BAAQMD significance thresholds. Table 3.2-4 shows the estimated short-term construction emissions associated with the project and compares those emissions to the BAAQMD's significance thresholds for construction exhaust emissions. All construction-related emissions would be below the BAAQMD significance thresholds. BAAQMD also recommends that all projects implement the basic construction mitigation measures to ensure a project's impacts on air quality are less than significant even when project construction emissions are below the numeric significance thresholds. Marin Development Code section 22.20.040.C specifies dust control measures that are required for projects involving ground disturbance. The dust control measures specified in Marin Development Code section 22.20.040.C are equivalent to the BAAQMD basic construction mitigation measures. With implementation of dust control measures consistent with Marin Development Code, the impact from a cumulatively

considerable net increase in any criteria air pollutant for which the region is in non-attainment would be less than significant.

Table 3.2-4 Estimated Maximum Average Daily Emissions by Phase (pounds per day)

Condition/year	ROG	NO_X	PM_{10}	$PM_{2.5}$	CO
Construction	2.68	4.18	1.13	0.34	8.51
Operation	3.60	2.55	3.29	0.89	15.41
Significance threshold	54	54	82	54	—
Exceeds threshold?	**No**	**No**	**No**	**No**	**No**

Notes:
Amounts shown are in pounds per day.

Operation/Occupancy

As shown in Table 3.2-4, the project's operational emissions would not exceed any BAAQMD threshold for any criteria air pollutants. The project would not result in a cumulatively considerable net increase in any criteria air pollutant for which the region is in non-attainment, and the impact would be less than significant.

c) Would the Project expose sensitive receptors to substantial pollutant concentrations?

Sensitive receptors in the vicinity of the project site include a few local residences located along Giacomini Road to the north of the project site. No other sensitive receptors are located within 1,000 feet of the project. The project construction would involve use of heavy equipment that would generate emissions. The heavy equipment that would be used during construction is summarized in Table 2.4-1. The construction equipment would move around the project site throughout the construction period and would not be stationary in any one area near sensitive receptors. Because the project involves reuse of existing buildings, roads, and infrastructure, the limited use of heavy equipment during construction would not expose any sensitive receptors to substantial pollutant concentrations. During project operation and occupancy, the project would be all electric. The project includes solar panels and BESS capable of supplying the entire energy use of the project in addition to interconnection to PG&E electrical grid. The project would include an emergency generator that would only be used during emergencies when both electrical power from PG&E and solar and BESS power are not available. The emergency use of the generator would not expose sensitive receptors to substantial pollutant concentrations due to the very infrequent use of the generator.

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

Residential projects are not generally associated with odor emissions that would adversely affect surrounding uses. During construction of the project, the use of diesel-powered vehicles

and equipment would generate temporary and localized odors. The use of diesel-powered vehicles and equipment would be temporary and use of heavy equipment during those periods of time would be sporadic, and equipment would not be in use during the entire construction period. Project emissions would cease after the completion of construction. The proposed project would not create new or long-term objectionable odors. Therefore, the impact from other emissions such as odors would be less than significant.

Mitigation Measures

None required.

3.2.4 Biological Resources

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

Environmental Setting

Biological resources within the project area were evaluated through review of literature and field surveys. The results of the biological resource investigation are presented in *Biological Site Assessment Report, U.S. Coast Guard Housing Facility Redevelopment Point Reyes Station, Marin County, California* (Appendix B). The environmental setting information presented in this section is summarized from that report. The project would receive project-based vouchers from the County of Marin using federal funds provided by the HUD and is subject to the HUD environmental review procedures found in 24 CFR Part 58, which require compliance with

NEPA and Section 7 of the Endangered Species Act (ESA). The County completed consultation with the National Marine Fisheries Service pursuant to section 7(a)(2) of the ESA and implementing regulations at 50 CFR 402, and Section 305(b) of the Magnuson-Stevens Fishery Conservation and Management Act for the project on January 19, 2024 (Appendix B). The County also requested to initiate consultation with USFWS on January 2, 2024 (Appendix B).

Special-Status Species

Vegetation Communities and Land Cover Types

Terrestrial land cover types were mapped across the project area by biologists in 2021. Vegetation communities and land cover types mapped within the project area are summarized in Table 3.2-5, below.

Table 3.2-5 Vegetation Communities and Land Cover Types

Vegetation community/ land cover type	Description	Acres
CCC Seasonal Wetland	CCC seasonal wetland are dominated by facultative grasses including common velvetgrass (*Holcus lanatus*), Italian ryegrass (*Festuca perennis*), and beardless wild rye (*Elymus triticoides*). Areas mapped as CCC seasonal wetland are not jurisdictional to the Corps or RWQCB, but are considered jurisdictional to the CCC, and are considered aquatic ESHA.	0.67
Corps Seasonal Wetland	Dominant vegetation within seasonal wetlands included Mexican rush (*Juncus mexicanus*), Italian ryegrass, common velvetgrass, and barley (*Hordeum marinum* ssp. *gussoneanum*), with subdominance by brown headed rush (*Juncus phaeocephalus*), waxy mannagrass (*Glyceria declinata*), and tall cyperus (*Cyperus eragrostis*). Areas mapped as seasonal wetland classify as an aquatic ESHA.	0.69
Ephemeral Ditch	The ephemeral ditch is approximately 30 feet in length and approximately 2 to 4 feet wide. The ephemeral ditch likely flows only during periods of above average precipitation. The ephemeral ditch is not considered an ESHA and lacks riparian vegetation.	0.01
Perennial Stream	Lagunitas Creek is a perennial stream and contain water year round. Areas mapped as perennial stream classify as an aquatic ESHA.	1.61
Purple Needlegrass Grassland	Purple needlegrass grassland contains 10 to 40 percent relative cover of purple needlegrass (*Stipa pulchra*). Other species observed include slim oat, purple false brome, California oatgrass (*Danthonia californica*), lupine, blue eyed grass (*Sisyrinchium bellum*), and flax (*Linum bienne*). Purple needlegrass grassland within the Study Area fits within the membership rules of the *Stipa [Nassella] pulchra – Bromus* spp. Association, which is considered sensitive by CDFW (2023a). Therefore, this community is considered a terrestrial ESHA.	0.61

Vegetation community/ land cover type	Description	Acres
Arroyo Willow Thicket	The canopy of the arroyo willow thicket vegetation community is dominated arroyo willow with red willow (*Salix laevigata*), red alder (*Alnus rubra*), Oregon ash (*Fraxinus latifolia*), and box elder (*Acer negundo*). The understory is typically dominated by dense cover of California blackberry (*Rubus ursinus*). Arroyo willow thicket is both a riparian vegetation community and an aquatic ESHA.	11.44
California Bay Forest	The canopy of the California bay forest vegetation community is dominated by California bay (*Umbellularia californica*), with inclusions of non-native invasive blue gum eucalyptus (*Eucalyptus globulus*), and coast live oak (*Quercus agrifolia*). The understory is sparsely dominated by forget me not (*Myosotis latifolia*), lady fern (*Athyrium filix*-femina var. *cyclosorum*), and poison oak (*Toxicodendron diversilobum*). California bay forest is considered sensitive by CDFW.	1.13
Developed/Landscaped	Developed/landscaped areas are composed of the former USCG barracks, buildings, associated infrastructure (e.g., roads, parking lots, and sidewalks), and ornamental trees and shrubs. The topography of the area has been altered from its original form, graded to accommodate development. The vegetation is highly altered, consisting of non-native ornamental trees and shrubs, and disturbance tolerant herbs. Species include Deodar cedar (*Cedrus deodara*), Monterey pine (*Pinus radiata*), Mexican fan palm (*Washingtonia robusta*), slim oat (*Avena barbata*), English lawn daisy (*Bellis perennis*), and bristly ox-tongue (*Helmintotheca echioides*).	9.66
Non-Native Annual Grassland	Non-native annual grassland is composed of several alliances of annual and perennial non-native grasses. Vegetative cover within non-native annual grassland is typically dominated by dense non-native invasive grasses and forbs including slim oat (*Avana barbata*), ripgut brome (*Bromus diandrus*), reed fescue (*Festuca arundinacea*), and purple false brome (*Brachypodium distachyon*). This community borders and intergrades with adjacent stands of native purple needlegrass grassland on slopes, and it borders mesic grassland, and seasonal wetlands on low lying flats and depressions. Commonly observed forbs within non-native annual grassland included coastal heron's bill (*Erodium cicutarium*), sheep sorrel (*Rumex acetosella*), lupine (*Lupinus bicolor*), and hairy cat's ear (*Hypochaeris radicata*). Non-native annual grassland is not considered sensitive by Marin County, CDFW, or any other regulatory entity.	7.77

Special-Status Species

Potential special-status species occurrences were evaluated in the project area through a literature and database review. Database searches for known occurrences of special-status species were conducted for a 5-mile radius surrounding the project area through the California Natural Diversity Database (CNDDB), California Native Plant Society (CNPS) Rare Plant Inventory, and U.S Fish and Wildlife Service (USFWS) Information for Planning and

Consultation (see Appendix B) (CDFW 2023; USFWS 2023; CDFW 2023). Potential for special-status species to occur on the site was based on the presence of suitable habitat as documented in a site visit on January 20, 2021 (WRA, Inc. 2023) (see Appendix B). The potential for each special-status species to occur in the project area was then determined according to the following criteria:

- **No Potential.** Habitat on and adjacent the site is clearly unsuitable for the species requirements (foraging, breeding, cover, substrate, elevation, hydrology, plant community, site history, disturbance regime).
- **Low Potential.** Few of the habitat components meeting the species requirements are present, and/or the majority of habitat on and adjacent to the site is unsuitable or of very poor quality. The species is not likely to be found on the site.
- **Moderate Potential.** Some of the habitat components meeting the species requirements are present, and/or only some of the habitat on or adjacent to the site is unsuitable. The species has a moderate probability of being found on the site.
- **High Potential.** All of the habitat components meeting the species requirements are present and/or most of the habitat on or adjacent to the site is highly suitable. The species has a high probability of being found on the site.
- **Present.** There is recent documentation of the species in the area during surveys.

To determine the presence or absence of special-status plant species, focused surveys were conducted within the project site on January 20, April 9, and June 4, 2021, and no special-status plants were identified in the project area (WRA, Inc. 2023). Special-status plants are, therefore, presumed absent for the project area. A general wildlife assessment was performed on January 20, 2021 (WRA, Inc. 2023). Those species that were determined to have a moderate or high potential to occur on the site or are present in the area are summarized in Table 3.2-6, below.

Table 3.2-6 Special-status Species Potential to Occur

Common name (scientific name)	Listing status	Habitat requirements	Potential to occur
Fish			
Steelhead (*Oncorhynchus mykiss irideus*)	FT, SE	Occurs inland and in coastal marine waters. Requires beds of loose, silt-free, coarse gravel for spawning. Also needs cover, cool water and sufficient dissolved oxygen.	Present in Lagunitas Creek
Coho salmon (*Orcorhynchus kisutch*)	FT	Occurs from the Russian River south to Soquel Creek and Pajaro River. Also in San Francisco and San Pablo Bay Basins. Adults migrate upstream to spawn in cool, clear, well-oxygenated streams. Juveniles remain in fresh water for 1 or more years before migrating downstream to the ocean.	Present in Lagunitas Creek

Common name (scientific name)	Listing status	Habitat requirements	Potential to occur
Tomales roach (*Lavinia symmetricus ssp.*)	SSC	Occurs in tributaries to Tomales Bay. Habitat generalist, tolerant of relatively high temperatures and low oxygen levels in a variety of freshwater stream reaches. Intolerant of highly saline conditions.	High potential in Lagunitas Creek
Invertebrates			
Monarch butterfly (*Danaus plexippus*)	FC; winter roosts protected by CDFW	Winter roost sites extend along the coast from northern Mendocino to Baja California, Mexico. Roosts located in wind-protected tree groves (usually eucalyptus, Monterey pine, Monterey cypress), with nectar and water sources nearby.	Moderate potential (winter roosting)
California freshwater shrimp (*Syncaris pacifica*)	FE, SE	Endemic to Marin, Napa, and Sonoma counties. Found in low elevation, low gradient streams where riparian cover is moderate to heavy. Favors shallow pools away from the main stream flow. Winter: undercut banks with exposed roots; summer: leafy branches touching water.	Present in Lagunitas Creek
Amphibians			
California red-legged frog (*Rana draytonii*)	FT, SSC	Lowlands and foothills in or near permanent sources of deep water with dense emergent and/or overhanging riparian vegetation. Favors perennial to intermittent ponds, stream pools and wetlands. Requires 11 to 20 weeks of continuous inundation for larval development. Disperses through upland habitats during and after rains.	Moderate potential in non-breeding aquatic habitat
Reptiles			
Western pond turtle (*Actinemys marmorata*)	SSC	A thoroughly aquatic turtle of ponds, marshes, rivers, streams and irrigation ditches with aquatic vegetation. Require basking sites such as partially submerged logs, vegetation mats, or open mud banks, and suitable upland habitat (sandy banks or grassy open fields) for egg-laying.	High potential in Lagunitas Creek
Birds			
Grasshopper sparrow (*Ammodramus savannarum*)	SSC	Summer resident. Breeds in open grasslands in lowlands and foothills, generally with low to moderate-height grasses and scattered shrubs. Well-hidden nests are placed on the ground.	Moderate potential in open grassland

Common name (scientific name)	Listing status	Habitat requirements	Potential to occur
White-tailed kite (*Elanus leucurus*)	CFP	Year-long resident of coastal and valley lowlands, including agricultural areas. Nests in a variety of tree types. Preys on small diurnal mammals and occasional birds, insects, reptiles, and amphibians.	Moderate potential for nesting
San Francisco (saltmarsh) common yellowthroat (*Geothlypis trichas sinuosa*)	SSC	Resident of the San Francisco Bay region, in fresh and saltwater marshes. Requires thick, continuous cover down to water surface for foraging; tall grasses, tule patches, willows for nesting.	Moderate potential in riparian areas with dense understory
Bryant's savannah sparrow (*Passerculus sandwichensis alaudinus*)	SSC	Year-round resident associated with the coastal fog belt, primarily between Humboldt and northern Monterey Counties. Occupies low tidally influenced habitats and adjacent areas; often found where wetland communities merge into grassland. May also occur in drier grasslands. Nests near the ground in taller vegetation, including along roads, levees, and canals.	Moderate potential in areas of open grassland
Yellow warbler (*Setophaga petechia brewsteri)*	SSC	Summer resident throughout much of California. Breeds in riparian vegetation close to water, including streams and wet meadows. Microhabitat used for nesting variable, but dense willow growth is typical. Occurs widely on migration.	Moderate potential for nesting in riparian woodland and thickets
Mammals			
Pallid bat (*Antrozous pallidus*)	SSC, WBWG High	Found in deserts, grasslands, shrublands, woodlands, and forests. Most common in open, forages along river channels. Roost sites include crevices in rocky outcrops and cliffs, caves, mines, trees and various manmade structures such as bridges, barns, and buildings (including occupied buildings). Roosts must protect bats from high temperatures. Very sensitive to disturbance of roosting sites.	Moderate potential for roosting within unoccupied buildings
Townsend's western big-eared bat (*Corynorhinus townsendii townsendii*)	SSC, WBWG High	Humid coastal regions of northern and central California. Roost in limestone caves, lava tubes, mines, buildings etc. Will only roost in the open, hanging from walls and ceilings. Roosting sites limiting. Extremely sensitive to disturbance.	Moderate potential for roosting within unoccupied buildings

Common name (scientific name)	Listing status	Habitat requirements	Potential to occur
American badger (*Taxidea taxus*)	SSC	Most abundant in drier open stages of most shrub, forest, and herbaceous habitats. Requires friable soils and open, uncultivated ground. Preys on burrowing rodents.	High potential in grassland with friable soils

Notes:

FT = federally listed as threatened; FE = federally listed as endangered; FC = federal candidate for listing; SE = state listed as endangered; SSC = species of special concern; CFP = CDFW fully protected; WBWG = Western Bat Working Group

Source: Biological Site Assessment Report (WRA, Inc. 2023)

Riparian Habitat and Sensitive Natural Communities

Riparian habitat within the project area includes arroyo willow thickets. Sensitive natural communities within the project area include all areas designated as ESHA in the LCP as shown in Figure 2.2-3. The ESHA areas include wetland (CCC seasonal wetland and Corps seasonal wetland), streams and riparian vegetation (Lagunitas Creek, which is a perennial stream, and its associated riparian woodland); and terrestrial (purple needlegrass grassland). California bay forest is also defined as a sensitive natural community by CDFW (2023c).

Wetlands

Wetlands, including CCC seasonal wetland and Corps seasonal wetlands, occur within the project area, as shown in Figure 2.2-3.

Critical Habitat

The project area does not contain any designated critical habitat for USFWS-listed species, but the reach of Lagunitas Creek within and adjacent the project site is designated critical habitat for steelhead and coho salmon (NMFS 2022). Lagunitas Creek is also mapped as essential fish habitat for salmonids (NMFS 2021).

Discussion

a) Would the Project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

Construction

Special Status Plants

No special-status plants occur within the project area based on the results of focused surveys. Because no special-status plants occur in the area, the project would have no impact on special-status plants.

Special Status Fish and California freshwater shrimp

CCC steelhead, CCC coho salmon, Tomales roach, or California freshwater shrimp occur within Lagunitas Creek within the project site. The project does not propose any activities within Lagunitas Creek and would not impact the riparian vegetation along Lagunitas Creek. Because the project construction would avoid Lagunitas Creek and all vegetation along the creek, there will be no direct impact on CCC steelhead, CCC coho salmon, Tomales roach, or California freshwater shrimp.

The project has the potential to indirectly impact CCC steelhead, CCC coho salmon, Tomales roach, or California freshwater shrimp. Indirect impacts may occur during construction as a result of potential impacts on water quality from leaking fuel or hydraulic lines on heavy equipment, improper fuel handling practices, spills during refueling or lubrication operations, and sediment runoff from clearing and grading. The proposed Project would include demolition and construction activities, including tree removal and grading in proximity to Lagunitas Creek. These activities would involve earthmoving and other actions that would disturb soils and generate construction debris. Erosion of disturbed soils or sheet flow runoff from the surrounding disturbed Project area could increase turbidity and sedimentation in Lagunitas Creek that could affect California freshwater shrimp and salmonids' feeding rates and growth, cause behavioral avoidance, and in extreme cases result in injury or mortality.

The construction contractor would need to prepare a project-specific Stormwater Pollution Prevention Plan (SWPPP) and comply with the Construction Stormwater General Permit (Order # 2022-0057-DWQ). The Project would also ensure that all fuel and hydraulic lines on heavy equipment are in good working order and not leaking. All equipment would be serviced on an as-needed basis with the necessary fueling and lubrication conducted at designated staging sites prior to the start of work. Accidents such as the breaking of a hydraulic line would require immediate clean-up of the area well before the onset of high-flow conditions as per terms and conditions of state and federal permits. The SWPPP would contain *best management practices* (BMPs) and design and conservation measures that would be used to control construction area erosion, transport, and deposition of sediment into the channel and production of turbid water. These include erosion control BMPs (e.g., silt fences, straw wattles, seed-free mulching) and revegetation with native plants. Compliance with the Construction Stormwater General Permit and other design features would avoid significant impacts on CCC steelhead, CCC coho salmon, Tomales roach, and California freshwater shrimp and the resulting indirect impact would be less than significant.

Monarch Butterfly

The mature eucalyptus trees within the project area provide potential roosting habitat for monarch butterfly. Because the project includes removal of 19 mature eucalyptus trees that provide potential habitat for monarch butterflies, the project has the potential to impact monarch butterflies if there were an active monarch roost within the eucalyptus tree at the time of construction. Mitigation Measure BIO-1 requires removal of eucalyptus trees outside of the roosting period for monarch butterflies to avoid the potential for impacts on a roost of monarch butterflies. The removal of 19 eucalyptus trees would not constitute substantial removal of

habitat that would significantly impact monarch butterflies. Eucalyptus trees are common throughout the region, and monarch butterflies are not known to use the trees in the project area or vicinity. Research from Griffiths and Villablanca (2015) shows that monarchs will select native tree species such as coast redwood over non-native eucalyptus when they are available. The project would plant coast redwood trees as part of the native vegetation palette, creating preferred habitat for monarch butterfly roosting, and would also create larval habitat by planting native milkweed (*Asclepias speciosa*), which is included in the plant palette (Appendix B). Because the Mitigation Measure BIO-1 would avoid impacts on any roosts of monarch butterflies and the project would replace habitat for monarch butterflies, the impact on monarch butterflies would be less than significant with implementation of mitigation.

California Red-legged Frog

The majority of the project area is located within suitable upland habitat for California red-legged frog (CRLF), which includes areas within 300 feet of the Lagunitas Creek riparian corridor. The project would remove 2,152 square feet of existing facilities from upland areas within ESHA and adjacent the riparian corridor and would replace those structures with bioretention facilities, which would provide a long-term benefit to water quality and habitat.

CRLF can disperse from the riparian habitat and ponds near the project site into upland areas. CRLF could potentially burrow in grassland areas or undisturbed portions of the project site. In the event that CRLF are present within the construction area at the time of project construction, the vegetation removal, grading, and other ground-disturbing construction activities could result in injury or mortality of CRLF if one were to occur within the project area during construction. Injury or mortality of a CRLF would be a significant impact.

Implementation of Mitigation Measures BIO-2 through BIO-13 require a USFWS-approved biologist to conduct pre-construction clearance surveys, biological monitoring by a designated biologist during ground-disturbing activities, installation of temporary exclusion fencing to prevent CRLF dispersal into the work area during construction, worker environmental awareness training, construction avoidance periods after rain events, and covers for open excavations. Should the species occur on the site during construction, the mitigation measures also define procedures for safe disposition of CRLF. Because Mitigation Measures BIO-2 through BIO-13 include protections to avoid injury or mortality of a CRLF during construction, the impact on CRLF would be less than significant with implementation of mitigation.

Indirect impacts on CRLF from water quality impacts in Lagunitas Creek are described above under impacts to special-status fish and amphibians. As described above, indirect impacts on CRLF from potential water quality impacts during construction would be less than significant.

Western Pond Turtle

Lagunitas Creek provides perennial aquatic habitat for western pond turtle and western pond turtle could occur in Lagunitas Creek intermittently. Upland nesting of western pond turtle is unlikely in the project disturbance area given the distance from the stream (approximately 220 feet at the nearest location and mostly greater), the presence of dense herbaceous vegetation

between the stream and the disturbance area, and the developed/disturbed nature of the portion of the project area facing the stream. While upland nesting is unlikely in the disturbance area, the presence of western pond turtle cannot be ruled out given the proximity to Lagunitas Creek and riparian habitat. Any injury or mortality of western pond turtle as a result of the project would be a significant impact.

Implementation of Mitigation Measures BIO-2, BIO-3, BIO-6, and BIO-10 include procedures for worker training, installation of exclusion fencing, which would effectively avoid entry of western pond turtle into the project area, biological monitoring during construction, and covering of trenches to avoid a western pond turtle from entering any trench. Because the project includes implementation of mitigation measures that would effectively exclude western pond turtle from the project area, and there would be monitors on the site that would be able to detect their presence and address the species if they were to occur in the area, the impact on western pond turtle during construction would be less than significant with implementation of mitigation.

Indirect impacts on western pond turtle from water quality impacts in Lagunitas Creek are described above under impacts to special-status fish and amphibians. As described above, indirect impacts on western pond turtle from potential water quality impacts during construction would be less than significant.

Special Status Birds

White-tailed kite, yellow warbler, and other bird species protected by the Migratory Bird Treaty Act (MBTA) have the potential to use the vegetation and trees within the project area as nesting habitat. Removal of trees with an active nest of special-status bird species would cause destruction of the nest and eggs which would be a significant impact. In addition, the project construction would involve use of heavy equipment that would produce noise in proximity to suitable habitat for special-status birds and other birds protected by the MBTA. Generation of noise in proximity to an active nest could affect nesting behavior and cause nest abandonment. Nest abandonment for any special-status bird species or bird protected under the MBTA would be a significant impact.

Marin Development Code section 22.20.040.G limits tree/vegetation removal and initial ground disturbance activities occur outside of the active nesting season (i.e., February 1 to August 15) when feasible, pre-construction surveys for birds in any vegetation removed during the nesting season, and avoidance procedures for active nests including buffers from active nesting habitat as determined by a qualified biologist. The project would also plant more trees than would be removed during construction, and there would be no loss of suitable nesting habitat as a result of project construction. Marin Development Code does not specify the disturbance free buffers to be enacted during construction. Due to the potential for special-status birds to occur in the area, Mitigation Measure BIO-14 defines increased buffer distances for special-status species. Because Marin Development Code section 22.20.040.G includes specific procedures to protect active bird nests and mitigation measure BIO-14 includes increased buffer distances, the impact on special-status birds and other MBTA protected bird species would be less than significant.

Special Status Mammals

Two special-status bat species, pallid bat and Townsend's big-eared bat, were determined to have moderate potential to be present within the study area, including roosting within buildings. Building demolition during the bat maternity season (generally, April through August) could impact bat breeding and potentially result in the mortality of bats, which would be a significant impact. Marin Development Code section 22.20.040.F defines procedures for pre-construction surveys and protection of active bat roosts during construction and demolition activities during the bat roosting season. Because bats and active roosts would be protected with implementation of Marin Development Code section 22.20.040.F, the impact on special-status bats from project construction and demolition activities would be less than significant.

Remnant American badger burrows were observed within open grassland areas within the project site, and American badgers are assumed to be present within grassland areas in the project site. The project would install solar panels and potentially require trenching of electrical conduit in grassland areas. The wastewater treatment facility would also be located in grasslands. Ground disturbance in grassland areas has the potential to impact American badgers if there were an active burrow in the area at the time of construction. Destruction of a burrow or other means of injury or mortality of an American badger would be a significant impact. The impacts on suitable habitat for American badger (grasslands) would be minimal and would not cause a significant impact on the species.

Mitigation Measure BIO-15 requires protections for American badger including pre-construction surveys and buffers from any active burrows of American badger. Because Mitigation Measure BIO-15 defines procedures to protect American badger, the impact on American badger during construction would be less than significant with mitigation.

Operation/Occupancy

The project operation and occupancy would not result in loss of any habitat for special-status species. Operation of the facilities and occupancy would occur within the developed project areas. The landscaped areas and bioretention basins constructed as part of the project could provide some upland habitat for CRLF and would provide increased habitat for potential bird nesting due to the increase in trees.

The project would include installation of a new enhanced wastewater treatment system to produce high-quality effluent that can be reused for landscape irrigation around the site. The associated leach fields would be used as a backup disposal system during periods of rainfall or when the irrigation system is being maintained. As a precautionary measure, the treatment and disposal systems would be sized up by a safety factor of 1.1 to manage increased flows during special events with increased usage. To protect groundwater at the site and create a reliable supply of non-potable water for irrigation needs, the wastewater treatment system would be designed to meet the State's Recycled Water Standards, established in California Code of Regulations Title 22, for disinfected tertiary treatment. The treatment system would be designed to produce disinfected tertiary treated recycled water that would have a biochemical oxygen demand, total suspended solids, and total nitrate level to less than 10 mg/L. Advanced

oxidation treatment may also be used to remove trace contaminants including pharmaceuticals and other contaminants of emerging concern. The recycled water must also meet effluent limits set by the State Water Resources Control Board Order WQ 2014-0153-DWQ "General Waste Discharge Requirements for Small Domestic Wastewater Treatment Systems" (2014 WDR General Order).

The tertiary treated wastewater would be applied via subsurface drip dispersal during the dry season when the wastewater application is less than the evapotranspiration rate of the landscaping it is being applied to. Because the minimum depth to groundwater in the proposed irrigation areas is greater than 4.5 feet below ground surface, subsurface drip systems would be placed at approximately 1.5 feet below ground surface, resulting in a greater than 3-foot separation between the subsurface drip system and groundwater. Monthly irrigation demands were calculated based on historical precipitation reference evapotranspiration data. In the summer, 100 percent of recycled water supply would be used for irrigation, and potable water may be needed to supplement, depending on the final landscape plan and plants selected. In the winter months, irrigation would only consume 25 percent of the recycled water supply, and the excess recycled water would be sent to the leach field for disposal. Because the wastewater would be applied at a rate that it would be used by the landscaping, the wastewater applied to the landscaping would not migrate to the creek and would not affect water quality in Lagunitas Creek. The subsurface drip dispersal areas would therefore not affect special status species and habitat areas in Lagunitas Creek.

During the rainy season, when the irrigation water demand does not exceed rainfall, the wastewater would be applied within the leach field as the primary means of water reuse. The leach field is sized to accommodate 100 percent of the design flow of the septic system. The leach field would be used during periods of low irrigation demand, during rain events, and when the subsurface drip system needs maintenance. All subsurface drip dispersal areas and leach fields must comply with local regulations, which require a 110-foot setback from flowing streams, a 50-foot setback from ephemeral stream drainages, and a 75-foot setback from intermittent watercourses or seasonal wetlands. The leach field is located approximately 400 feet from Lagunitas Creek at the nearest point. Leach fields would include trenches measuring 24 inches deep by 24 inches wide. Leach field saturation or ponding is unlikely, given the high quality of recycled water, which would minimize biological growth and potential clogging in the leach trench. Because depth to groundwater in the proposed leach field locations is greater than 8 feet below the ground surface and wastewater would be discharged subsurface, and because the leach field is separated from Lagunitas Creek by 400 feet, discharge waters in the leach field would infiltrate to the groundwater and would not migrate to the creek surface waters. Leach field discharges, therefore, would not affect water quality and special status species in Lagunitas Creek.

Following construction, storm drain outlet pipes would be intercepted and routed to six new bioretention facilities throughout the project site to provide treatment of existing and proposed impervious surfaces. In addition, the existing mulched playground would be converted into a self-retaining area that would accept runoff from the uphill site to allow for infiltration into the

ground. The project would result in reduced impervious surface area and increased bioretention self-retaining areas during operation and would therefore be expected to result in reduced sediment loading and provide increased treatment of runoff to Lagunitas Creek. Therefore, the proposed impervious surfaces and self-retaining areas are not likely to adversely affect special status species in Lagunitas Creek and riparian habitat.

b) Would the Project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

The project site contains riparian (arroyo willow) habitat, habitat types defined in the Coastal Plan as ESHA (i.e., purple needlegrass grassland, CCC seasonal wetland, and Corps seasonal wetland), and California bay forest, which is designated by CDFW as a sensitive natural community. The project would not involve any construction activities or facilities within riparian areas, purple needlegrass grassland ESHA, CCC seasonal wetland ESHA, Corps seasonal wetland ESHA, or California bay forest. The project would not result in removal or direct impacts on any riparian area of sensitive natural community occurring on the project site. The project has also been designed to avoid construction within a 50-foot buffer of purple needlegrass ESHA, CCC seasonal wetland ESHA, and Corps seasonal wetland ESHA. The project would involve activities within the 50-foot riparian ESHA buffer to remove existing structures from the ESHA buffer and construct bioretention facilities. Grading of the new bioretention areas in proximity to the riparian corridor could result in indirect temporary impacts on riparian habitat for temporary increased sedimentation. The construction contractor would need to prepare a project-specific Stormwater Pollution Prevention Plan (SWPPP) and comply with the Construction Stormwater General Permit (Order # 2022-0057-DWQ). Implementation of erosion and sediment control BMPs in compliance with the SWPPP and Construction Stormwater General Permit would reduce impacts on riparian areas from grading nearby to a less than significant level. Removal of existing structures and installation of new bioretention areas would have a net benefit on habitat and water quality during project operation. Due to avoidance of activities within the ESHA areas, with the exception of removal of existing structures, the project would avoid indirect impacts, on sensitive habitats. The impacts on riparian areas and sensitive vegetation communities would be less than significant.

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

The project does not involve any construction within state or federally protected wetlands and would not involve direct removal, filling, or hydrologic interruption to any wetland areas. The project includes a 50-foot buffer from CCC seasonal wetlands and Corps wetlands, and the only activities that would be conducted within 100 feet of any wetland would be removal of existing structures and replacement of the existing structure with bioretention areas, which would have a net benefit on habitat and water quality. Because the project would avoid construction within

a wetland and a minimum 50-foot buffer from the nearest wetland area, the project impacts on wetlands would be less than significant.

d) Would the Project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

The movement and migratory corridors for fish and wildlife on the project site include Lagunitas Creek and associated riparian habitat. The project would not involve any activities within Lagunitas Creek or the adjacent riparian area. The 50-foot ESHA riparian buffer described in (b) above would maintain a critical migratory wildlife corridor and potential nursery sites for native resident or migratory wildlife. Additionally, the project site does not overlap with critical habitat for any listed species (USFWS 2023).

No breeding habitat for CRLF or western pond turtle occurs on the site with the exception of the riparian corridor and Lagunitas Creek, which would be avoided as described above. While the project would remove some trees that could provide nesting habitat from the area, the project would plant more trees than are removed, offsetting any loss of nursery sites.

The project construction would generate noise that could impact nesting behavior, which could be considered impeding use of a nursery site. Marin Development Code section 22.20.040 G defines specific procedures including pre-construction monitoring, buffers from any active bird nest, and biological monitoring to avoid disturbance of an active bird nest. Because Marin Development Code 22.20.040 G defines specific procedures to avoid nest disturbance, the impact on use of native wildlife nursery sites would be less than significant.

e) Would the Project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? (analysis)

The project is subject to all policies and ordinances described in the LCP (County of Marin 2019b), which includes ESHA buffers, as described above, to protect terrestrial and aquatic biological resources. The LCP also encourages the restoration and enhancement of degraded ESHAs, which would be accomplished through native tree and vegetation planting on the project site. Specific policies that would be applicable to the project include C-BIO-5, C-BIO-10, and C-BIO-11.

- **C-BIO-5 Ecological Restoration**: Encourage the restoration and enhancement of degraded ESHAs and the creation of new ESHAs, and streamline regulatory processes whenever possible to facilitate the successful completion of restoration projects.
- **C-BIO-10 Roosting and Nesting Habitat**: Prohibit the alteration or removal of groves of trees that provide colonial nesting and roosting habitat for monarch butterflies or other wildlife, except where the trees pose a threat to life or property.
- **C-BIO-11 Development Adjacent to Roosting and Nesting Habitat**: Development adjacent to wildlife nesting and roosting areas shall be set back a sufficient distance

to protect against disruption in nesting and roosting activities and designed to avoid impacts on the habitat area. Time such development activities so that disturbance to nesting and breeding wildlife is avoided. To the extent feasible, use native vegetation for landscaping.

The project would adhere to the requirements of C-BIO-5 by removing existing structures from an ESHA buffer and installing bioretention features that would help improve water quality within the ESHA. The project would adhere to C-BIO-10 by only removing diseased eucalyptus which would present a risk to risk to life and property and would not remove any groves of trees. The eucalyptus tree removal timing would also be scheduled to avoid the roosting season for monarch butterflies consistent with Mitigation Measure BIO-1. The project would adhere to policy C-BIO-11 by implementing Marin Development Code section 22.20.040 and Mitigation Measures BIO-1, BIO-2 to avoid project activities such as tree removal or structure demolition during times that could disrupt roosting or nesting habitat to the extent feasible and when avoidance of the nesting and roosting season is not feasible, ensuring the removal is completed under the direction of a qualified biologist to avoid impacts on any nesting or roosting behavior. Additionally, the project would plant more trees than it removes, offsetting any loss of nesting and roosting habitat. Because the project would implement ESHA buffers, enhance native vegetation through planting native species, would comply with Marin Development Code section 22.20.040, and implement Mitigation Measures BIO-1, BIO-2, the project would not conflict with any local policies or ordinances protecting biological resources, and effects would be less than significant with mitigation incorporated.

f) Would the Project Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

No Habitat Conservation Plans (HCPs) or Natural Community Conservation Plans (NCCPs) have been adopted covering the project area (CDFW 2023). The Marin County Open Space District (MCOSD) is the local government agency responsible for preserving public open space in Marin County. MCOSD, along with Marin County Parks, developed a Vegetation and Biodiversity Management Plan to guide management of the area. The project is not located within any of the MCOSD preserves identified in the Vegetation and Biodiversity Management Plan. Because the project is not included in any adopted HCPs, NCCCPs, or other local, regional, or state habitat conservation plans, the project would have no impact from conflicts with an HCP, NCCP or other habitat conservation plan.

Mitigation Measures

Mitigation Measure BIO-1: Tree Removal Outside of Monarch Butterfly Roosting Season
Any removal of eucalyptus trees shall occur outside of the winter roosting season for monarch butterfly in Marin County (October through February). If the roosting season for monarch butterfly cannot be fully avoided, a pre-construction survey for active monarch butterfly roosts shall be conducted by a qualified biologist within three days prior to removal of eucalyptus

trees. If no active roosts are identified within the eucalyptus trees, the trees may be removed. If active roosts are identified within the eucalyptus trees, the trees cannot be removed until the roost has left the area as documented by a qualified biologist.

Mitigation Measure BIO-2: Worker Environmental Awareness Training
Prior to construction, all contractor construction personnel shall attend an environmental training program provided by a qualified biologist. The training shall discuss sensitive species and nesting bird habitat that may occur within the project area as well as identification of California red-legged frog and their burrows.

The training shall include the responsibilities of contractor's construction personnel, applicable mitigation measures, and notification requirements. The training shall also address other measures that protect biological resources.

The following information shall also be provided during the training:

- Specific information regarding the special-status species potentially present and their habitat needs
- Any reports of occurrences in the project area
- An explanation of the status of each listed species and their protection under state and federal laws
- A list of measures being taken to reduce effects to the species during construction and implementation

Fact sheets conveying this information and an educational brochure containing color photographs of all special-status species potentially present shall be prepared for distribution to the above-mentioned people and anyone else who may enter the project area. Construction personnel shall be instructed to halt construction activities and contact the designated biologist if a wildlife species is observed in an area where it could be harmed by construction activities. A list of employees who attend the training sessions shall be maintained on the site during construction and made available to USFWS upon request.

Mitigation Measure BIO-3: Install Exclusion Fencing
Temporary exclusion fencing shall be installed around the limits of work areas to ensure special status animals (i.e., CRLF and western pond turtle) cannot enter the work area. Installation of exclusion fencing shall occur under the supervision of the designated biologist and immediately following a clearance survey of the area. The exclusion fencing shall have a minimum aboveground height of 30 inches, and the bottom of the fence shall be keyed in at least 4 inches deep and backfilled with soil to prevent wildlife from passing under the fencing. Exclusion fencing shall be installed to prevent species entry into active work areas and to mark the limits of construction disturbance.

The exclusion fencing shall be installed in a manner that reduces the potential for trapping migrating wildlife and for wildlife climbing over the fence, such as having the top of the fencing curved over on the outside of the fence. Cover boards shall be installed along the perimeter of

the fencing to provide protection from the sun and predators, where necessary and appropriate. Gates shall be installed in the exclusion fencing that allow project access and adequately exclude wildlife. Gates will be secured at the end of each workday using sandbags or other means to prevent wildlife from entering the exclusion zone. The exclusion fencing shall remain in place and be maintained for the duration of construction activities and shall be removed within 15 days of completion of construction activities.

Prior to construction personnel entering and beginning work in fenced areas each day, the fenced areas shall be inspected by a biological monitor for special status species or any trapped wildlife and to identify damage to the exclusion fencing. The biological monitor must be trained by the designated biologist (BIO-4) on California red-legged frog identification, the laws protecting the species, and procedures to implement if the species is observed. If California red-legged frogs or trapped wildlife are observed, the designated biologist shall be notified immediately to determine the appropriate procedures to implement. Any damage to the fencing shall be immediately reported and repaired until the last day that construction equipment is at the project site.

Mitigation Measure BIO-4: Designated Biologist
The applicant shall obtain USFWS approval for a designated biologist(s) for the project. The designated biologist(s) shall be on site during all activities that may result in take of California red-legged frog. The qualifications of the designated biologist(s) shall be submitted to USFWS for review and written approval at least 30 calendar days prior to the date earthmoving is initiated at the project site. The designated biologist(s) shall keep a copy of any Biological Opinion issued for the project in their possession when on site.

Mitigation Measure BIO-5: Designated Biologist Authority
The designated biologist(s) shall be given the authority to freely communicate verbally, by telephone, by electronic mail, or in writing at any time with construction personnel, any other person(s) at the project site or otherwise associated with the project, the USFWS, or their designated agents. The designated biologist shall have oversight over implementation of the avoidance and minimization measures and all permit conditions and shall have the authority and responsibility to stop project activities if they determine any of the associated permit requirements are not being fulfilled. If the designated biologist(s) exercises this authority, the USFWS shall be notified by telephone and electronic mail within 24 hours.

Mitigation Measure BIO-6: On-site Construction Monitoring
The designated biologist shall be present at the project site until all initial habitat disturbances have been completed. After habitat disturbance has been completed and all exclusion fencing has been installed, a biological monitor, who will be trained by the designated biologist, shall monitor daily on-site compliance with all avoidance and minimization measures (AMMs) defined in the U.S. Fish and Wildlife Service Biological Opinion. The biological monitor shall contact the designated biologist for instructions should any CRLF be observed on the site. The biological monitor and the designated biologist shall have the authority to halt any action that could adversely affect sensitive biological resources. The designated biologist shall continue to

conduct compliance checks at least once per week until construction is completed to ensure that the fencing is intact and that all AMMs are being implemented.

Mitigation Measure BIO-7: California Red-legged Frog Pre-construction Survey
No more than 24 hours prior to the date of initial ground disturbance, a pre-construction survey for California red-legged frog shall be conducted by a designated biologist at the project site.

The survey shall consist of walking the project limits and within the project site to ascertain the possible presence of California red-legged frog. The designated biologist shall investigate all potential areas that could be used by the species for feeding, breeding, sheltering, movement, and other essential behaviors. This includes an adequate examination of mammal burrows, such as for California ground squirrels or gophers.

If any California red-legged frogs are found, the designated biologist shall follow the procedures specified in Mitigation Measure BIO-13.

Mitigation Measure BIO-8: Timing Construction Commencement to Avoid California Red-legged Frog
Initial ground-disturbing activities shall be avoided between November 1 and March 31 to avoid the time period when California red-legged frogs are most likely to be moving through the project area.

Mitigation Measure BIO-9: Avoid Construction During Rain Events
No ground-disturbing construction activities shall occur during rain events or within 24 hours following a rain event. Prior to ground-disturbing construction activities resuming, a designated biologist shall inspect the project area and all equipment/materials for the presence of California red-legged frogs.

Mitigation Measure BIO-10: Cover Trenches
Trenches or pits 1 foot or deeper that are going to be left unfilled overnight shall be securely covered with boards or other material to prevent California red-legged frog or other special-status species from falling into them. If covering of trenches or pits is not feasible, wooden ramps or other structures of suitable surface that provide adequate footing for the California red-legged frog are to be placed in the trench or pit to allow for their unaided escape. Auger holes or fence post holes that are greater than 0.10 inch in diameter shall be immediately filled or securely covered so they do not become pitfall traps for the California red-legged frog or other special-status species. The biological monitor shall inspect the trenches, pits, or holes prior to their being filled to ensure there are no trapped wildlife in them. The trench, pit, or hole shall also be examined by the biological monitor each workday morning prior to initiation of work and in the late afternoon no more than 1 hour after work has ceased to ascertain whether any individuals have become trapped. If the escape ramps fail to allow the animal to escape, the biological monitor shall contact the designated biologist, who shall remove and transport the animal to a safe location or contact the USFWS for guidance.

Mitigation Measure BIO-11: Erosion Control Material
Plastic monofilament netting (i.e., erosion control matting), loosely woven netting, or similar material in any form shall not be used at the project site because California red-legged frogs can become entangled and trapped in them. Any such material found on site shall be immediately removed by the designated biologist or construction personnel. Materials utilizing fixed weaves (i.e., strands cannot move), polypropylene, polymer, or other synthetic materials shall not be used.

Mitigation Measure BIO-12: Waste Management
Uneaten human food and trash attracts crows, ravens, coyotes, and other predators of the California red-legged frog and other wildlife. A litter control program shall be instituted at the project site. All workers shall ensure their food scraps, paper wrappers, food containers, cans, bottles, and other trash are deposited in covered or closed trash containers. The trash containers shall be removed from the project site at the end of each working day.

Mitigation Measure BIO-13: Procedures for Encounters with California Red-legged Frog
Each encounter with the California red-legged frog will be treated on a case-by-case basis in coordination with the USFWS, but the general procedure is as follows: (1) the animal will not be disturbed if it is not in danger; or (2) the animal will be moved to a secure location if it is in any danger. These procedures are further described below.

When a California red-legged frog is encountered in the project area, all activities that have the potential to result in the harassment, injury, or death of the individual shall be immediately halted. The designated biologist will then assess the situation in order to select a course of action that shall avoid or minimize adverse effects to the animal. Contact with the animal shall be avoided and the applicant shall allow it to move out of the potentially hazardous situation to a secure location on its own volition. This procedure applies to situations where a California red-legged frog is encountered while it is moving to another location and is actively dispersing. It does not apply to animals that are uncovered or otherwise exposed or in areas where the individual is not expected to move on its own and may be in danger (e.g., within the fenced construction perimeter).

California red-legged frogs that are in danger (e.g., animals that are uncovered or otherwise exposed or in areas within the fences construction perimeter where the individual is not expected to move on its own) shall be relocated and released by the designated biologist outside the construction area within the same habitat. Prior to the initial ground disturbance, the designated biologist shall obtain approval of the relocation protocol from the USFWS in the event that a California red-legged frog is encountered and needs to be moved away from the project site. California red-legged frog shall be released in appropriate habitat nearby on the watershed. The designated biologist shall limit the duration of the handling and captivity of the California red-legged frog to the minimum amount of time necessary to complete the task. The applicant shall immediately notify the USFWS once the California red-legged frog is relocated and the site is secure.

Mitigation Measure BIO-14: Avoidance of Nesting Birds
All tree removal activities shall be avoided between February 1 and August 15 to avoid the time period when birds are most likely to be nesting, to the extent feasible. Prior to any construction activities during the bird nesting season (February 1 to August 15), a pre-activity nesting bird survey shall be conducted no more than 7 days prior to tree removal and start of construction activities. The survey shall include all areas within 500 feet of active construction. If active nests of special status or migratory bird species (listed in the MBTA) are found within the project site, or in areas subject to disturbance from construction activities, an avoidance buffer to avoid nest disturbance shall be constructed. The buffer size shall be determined by a qualified biologist and is based on the nest location, topography, cover, and species' tolerance to disturbance. A standard buffer of 500 feet shall be used for raptors and special-status birds and 200 feet for migratory birds. If the standard avoidance buffer is not achievable, a reduced buffer may be allowed under the direction of a qualified biologist and the qualified biologist will monitor the nest(s) to document that no take of the nest (nest failure) has occurred. Active nests shall not be taken or destroyed under the MBTA and, for raptors, under the CDFW Code. If it is determined that construction activity is resulting in any nest disturbance, work should cease immediately in the vicinity of the nest and will not be allowed to recommence in the area until the young have fledged the nest.

If preconstruction surveys indicate that nests are inactive or potential habitat is unoccupied during the construction period, no further action is required. Trees and shrubs within the construction footprint that have been determined to be unoccupied by special status birds or that are located outside the avoidance buffer for active nests may be removed. Nests initiated during construction (while significant disturbance from construction activities persist) may be presumed to be unaffected, and only a minimal buffer, determined by the qualified biologist, would be necessary.

Mitigation Measure BIO-15: American Badger Protection
Prior to ground-disturbing activities, a qualified biologist shall conduct a pre-construction survey of the project area to determine if new badger burrows have been constructed and/or if older (remnant) burrows appear to be re-occupied. These surveys will be conducted no less than 14 days and no more than 30 days prior to the start of ground disturbing activities. If burrows are occupied, the biologist will establish a 100-foot avoidance buffer around occupied maternity dens throughout the pup-rearing season (February 15 through July 1) and a 50-foot avoidance buffer around occupied dens during other times of the year.

3.2.5 Cultural Resources

Environmental Impacts	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
5. CULTURAL RESOURCES. Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?	☐	☐	☒	☐
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	☐	☒	☐	☐
c) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☒	☐

Environmental Setting

The project site was reviewed for the presence of both pre-contact and historic-era archaeological resources. The discussion below describes the methods and results of both project reviews.

Literature Review and Records Search

An archaeological study was completed for the project site in October 2023 (Evans & de Shazo, Inc. 2023). The proposed project would receive project-based vouchers from the County of Marin using federal funds provided by the HUD and is subject to the HUD environmental review procedures found in 24 CFR Part 58, which require compliance with NEPA and Section 106 of the NHPA, and its implementing regulations found at 36 CFR Part 800. The archaeological study included the following:

- A records search and literature review at the Northwest Information Center (NWIC) of the California Historical Resources Information System
- A search of the Native American Sacred Lands file inventory
- Tribal outreach, including consultation with the Federated Indians of Graton Rancheria (FIGR) – the federally recognized tribe with ancestral territory in Marin County
- Review of geoarchaeological reports and geologic and soils data to determine the potential/sensitivity for precontact period archaeological resources within the project area
- A pedestrian survey that was completed with a FIGR tribal monitor

A record search was conducted at the NWIC on August 10, 2023 (NWIC File No. 23-0221). The record search included a review of previous cultural resource studies and primary resource records pertaining to the project area and within 0.5 mile of the project site as well as additional documentation of listed or eligible cultural resources located in the vicinity, including the following:

- Office of Historic Preservation (OHP) Built Environment Resource Directory (BERD) for Marin County, California (OHP 2020)
- OHP Archaeological Resources Directory for Marin County, California (OHP 2012)
- California Inventory of Historic Resources (CIHR) (California Department of Parks and Recreation 1976)
- California Historical Landmarks (CHL) by County (OHP n.d.)
- California Points Resources (OHP n.d.)
- Five Views: An Ethnic Sites Survey for California (OHP 1988)

The NWIC found one previously recorded cultural resource within the project area (P-21-000684), one historic district adjacent the project area (P-21-002919), and eight others within 0.5 mile of the project area.

P-21-000684 (Historic-Period Refuse Scatter)

This site includes a historic-period refuse scatter located south of Commodore Webster Drive and east of the main entrance gate, in the southwestern portion of the project area. Historic-period artifacts were observed during the field survey in disturbed soils around two of the three tanks on site, including items such as bottle glass, white earthenware ceramic sherds, and a railroad spike. The artifacts appeared to date to the 1900s and are thought to have been deposited when the tanks were originally installed in the early to mid-1970s. The NRHP and CRHR eligibility of the resource is currently unknown; however, it is assumed that the resource would not be eligible for listing.

P-21-0002919 (Historic Ranch District)

This resource is the Olema Valley/Lagunitas Loop Ranches Historic District (aka, Olema Valley Dairy Ranches Historic District), a large discontinuous district comprised of 19 historic-period dairy ranches encompassing approximately 14,127 acres. The historic district was previously determined eligible for listing on the NRHP under Criterion A, in the area of Agricultural and Commerce at the local level of significance, and under Criterion C for Architecture at the local level of significance (Schultz and Davis 2017; Miller and Caywood 2008). The district represents an intact collection of early dairy ranches in California that propelled Marin County to the forefront of butter and cheese production by the 1870s. The period of significance extends from 1856, when the first dairy in Olema Valley was established, to 1958, when the last extant dairy ranch was converted to a Grade A dairy (Schultz and Davis 2017; Miller and Caywood 2008). The map provided in the National Register Nomination Forms prepared by Schultz and Davis (2017) shows the project area adjacent and north of the Genazzi Ranch, one of the historic Olema Valley/Lagunitas Loop Ranches.

Archaeological Resource Field Survey

A pedestrian field survey was completed by EDS on September 5, 2023. One previously recorded historic-period resource (P-21-000684) was located in the western portion of the project site, and a previously unrecorded 2,300-foot-long section of the North Pacific Coast Railroad alignment (P-21-000487; described below) was identified within the project area. In addition,

four historic-period artifacts were documented during the field survey (A1, A2, A3, and A4; described below).

P-21-000487 (North Pacific Coast Railroad

Resource P-21-000487 consists of remnants of the North Pacific Coast/Northwestern Pacific Railroad, including grades, berms, trestles, tunnels, and artifacts (i.e., railroad ties), located on the project site. The resource traverses the project area following the present-day alignment of Commodore Webster Drive; however, other than the alignment identified through archival research, no physical evidence of the resource was identified during the field survey. Previously identified segments in Marin County have been recommended ineligible for the NRHP and the CRHR due to lack of integrity as all the rail lines were removed in the 1930s and many of the associated structures have been destroyed or are in extreme disrepair. The railroad alignment within the project area does not retain sufficient integrity of design, materials, workmanship, feeling, or association to be considered eligible for the NRHP or the CRHR, individually or as a contributing element to the Olema Valley/Lagunitas Loop Ranches Historic District (P-21-002919). Accordingly, the resource was determined to be ineligible for the NRHP and CRHR due to lack of integrity.

Historic-Period Artifacts

The four historic period artifacts recorded within the project site include the following:

- A1: a blue glazed ceramic fragment measuring 1.9 inches wide by 1.6 inches long and 0.4 inches thick
- A2: an undecorated white ceramic cup fragment measuring 1.9 inches wide by 1.9 inches long and 0.7 inches thick
- A3: saw-cut animal long bone measuring 1.7 inches wide by 1.9 inches long and 0.1 inches thick
- A4: saw-cut animal rib bone measuring 4.5 inches long by 2 inches wide and 0.7 inches thick.

Artifacts A1, A2, and A3 were observed on the surface in the western portion of the project area outside of the proposed disturbance area. The artifacts are located approximately 75 feet north of the previously recorded historic-period refuse scatter (P-21-000684; described above). Artifact A4 was observed in the northern portion of the project area and outside of the area of disturbance. All four historic period artifacts were left in place(Evans, Shazo, and Inc 2023).

Pre-Contact Archaeological Resources

No pre-contact period archaeological resources were observed within the project area (Evans, Shazo, and Inc 2023).

USCG Point Reyes Station

A historic resource evaluation was conducted to evaluate the potential for built environment structures of historical significance to occur within the project area of potential effect (APE) (see Appendix D). The existing structures on the project site, including 23 individual buildings, structures, and features, were evaluated for historical significance due to the age of the

structures. The existing USCG structures were determined to be ineligible for NRHP and CRHR (Groundwork Planning & Preservation 2023).

Archaeological Resource Sensitivity

The project site contains both native and non-native (fill) soils. The portion of the project site that contains Holocene-age alluvium, including the previously developed area where most of the ground disturbance will take place, has a high potential/sensitivity for buried pre-contact period archaeological resources. The proposed wastewater treatment system in the western portion of the project area and the portion of Commodore Webster Drive west of the developed area are located on a landform consisting of Pleistocene age alluvium, which has a low potential/sensitivity for buried pre-contact period archaeological resources.

Discussion

a) Would the Project cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?

None of the existing structures on the project site, including 23 individual buildings, structures, and features, are eligible for listing under the NRHP or CRHR. Two resources, P-21-000684 and P-21-000487, also occur within the project site as do four historic-period isolates. P-21-000487 and the four historic-period isolates are not eligible for listing on the CRHR or NRHP, and the isolates are located in the western portion of the site in an area that would not be disturbed or developed by the project.

The NRHP/CRHR eligibility of P-21-000684 is currently unknown; however, the resource is in an area that would be avoided by the project, and the project would therefore not impact the significance of the resource. The project is also within 0.5 mile of the Olema Valley/Lagunitas Loop Historic District. The project site is not within the viewshed of the historic district and would have no effect on the significance of the historic district. Because the structures and buildings that would be renovated or demolished as part of the project are not eligible for listing on the CRHR, and because the remaining historic-period resources on the site are not within the area of project disturbance/effect, the project would not result in a change in the significance of any historical resources pursuant to 14 CCR section 15064.5, and no impact would occur.

b) Would the Project cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?

Based on the results of the background research and pedestrian survey, there are no intact pre-contact archaeological resources in the project area; however, there is a potential for unidentified buried archaeological resources to occur on-site due to the presence of native (i.e., non-fill) soils and previously identified resources in the area. In the event that archaeological resources are uncovered during project-related ground disturbing activities, compliance with Marin Development Code section 22.20.040.E is required. In compliance with the Marin Development Code Section 22.20.040.E, if archaeological materials are discovered during

construction, construction activities shall cease, and the remains shall be recorded by a qualified archaeologist and treated according to state law. While the Marin Development Code provides protection for archaeological resources, the code does not specify any buffer distance from the resource within which work shall halt, and without proper investigation of the resource by an archaeologist and/or appropriate Native Americans, if appropriate, the resource could be damaged due to work in the vicinity of the find. The damage to a resource prior to proper investigation or improper handling of the resource would be a significant impact. For this reason, treatment of discovered archaeological sites during construction pursuant to Marin Development Code Section 22.20.040.E could still result in significant impacts to archaeological resources within this portion of the project area. Mitigation Measure CUL-1 requires preparation of an archeological monitoring plan and defines specific requirements for monitoring and cessation of work in proximity of a find. The impact on pre-contact archaeological resources would be less than significant with mitigation.

c) Would the Project disturb any human remains, including those interred outside of formal cemeteries?

Both prehistoric and historic archaeological resources may contain human burials. Based on the background research and field surveys, there is no indication that the project area has been used for human burial purposes. The project includes excavation into undisturbed soils and could encounter human remains, including internment outside of formal cemeteries. Compliance with Marin Development Code Section 22.20.040.E, PRC section 5097.98, and Health and Safety Code section 7050.5 (outlined above in Section 4.6.2.3 Local Regulations) would require that work be stopped in the vicinity of any discovered human remains and that the County coroner be notified of the finds. The coroner would determine the nature of the remains and contact the NAHC if the remains are of Native American ancestry. In turn, the NAHC would contact the most likely descendent of remains, who would assess the finds and work with the County to determine final treatment and disposition of the remains. PRC section 5097.98 and Health and Safety Code section 7050.5 are also applicable to any discovery of human remains. Compliance with State and County requirements to address any discovery of human burials during construction would avoid disturbance of any human remains. The impact on human remains would be less than significant.

Mitigation Measures

Mitigation Measure CUL-1: Archaeological Monitoring Plan (AMP) and Archaeological Monitoring:
A Secretary of Interior-qualified archaeologist shall prepare an Archaeological Monitoring Plan (AMP) that includes a provision for worker Cultural Resources Awareness Training (CRAT) as well as details regarding the archaeological sensitivity of the project area, the types of archaeological resources that could be encountered, the methodology and protocols to be employed during monitoring, and specific procedures to identify, evaluate, and treat new archaeological discoveries and for addressing specific contingencies, such as the discovery of human remains, project personnel qualifications, data collection protocols, site safety

considerations, and post-field actions. The archaeologist preparing the AMP shall contact the Federated Indians of Graton Rancheria (FIGR) and provide them an opportunity to review and comment on the AMP prior to its finalization.

A professional archeologist shall provide sensitivity training to supervisory staff prior to initiation of site preparation and/or construction to alert construction workers to the possibility of exposing significant historic and/or prehistoric archaeological resources within the project area. The training shall include a discussion of the types of precontact or historic-period objects that could be exposed and how to recognize them, the need to stop excavation at a discovery, and procedures for protection and notification. An "alert sheet" shall be posted in staging areas, such as in construction trailers, to alert personnel to the procedures and protocols to follow for the discovery of a potentially significant historic-period and/or precontact archaeological resources.

A qualified archaeologist shall monitor all ground-disturbing activities that take place within native (i.e., non-fill) soils. If an archaeological deposit is encountered during ground-disturbing activities, all work within 50 feet of the discovery shall be halted until a Secretary of Interior qualified archaeologist and FIGR (in the case of precontact-period resources) inspects the material, assesses its historical significance, and provides recommendations for the treatment of the discovery in accordance with the Secretary of Interior's Standards for the Treatment of Historic Properties (36 CFR Part 86). Potentially significant historic-era resources may include all by-products of human land use greater than 50 years of age, including subsurface deposits of domestic type material (e.g., glass, ceramic, metal, wood, faunal remains, brick), buried alignments of stone, brick, or foundation elements, and possible features associated with the former railroad, open workspaces, or yard spaces. Potentially significant precontact period resources include midden soils, artifacts such as faunal bone, groundstone, fire-affected rock, baked clay, modified bone and/or shell, flake stone debitage, flake stone tools, etc., and features such as house floors, cooking pits, deliberately interred burials.

If work must commence in the sensitive area, it can only be performed using hand tools or powered hand tools, cannot include ground disturbance below the topsoil layer, and can only be accessed on foot. Alternatively, the cultural resource specialist/archaeologist shall evaluate the resource and determine whether it is:

- Eligible for the CRHR (and a historical resource for purposes of CEQA); or
- A unique archaeological resource as defined by CEQA.

If the resource meets the criteria for eligibility on the CHRH or is a unique archaeological resource, work shall remain halted, and the cultural resources specialist/archaeologist shall consult with County staff regarding methods to ensure that no substantial adverse change would occur to the significance of the resource pursuant to CEQA Guidelines section 15064.5(b).

Avoidance of the area, or avoidance of impacts to the resource, is the preferred method of mitigation for impacts to cultural resources and shall be required unless there are other equally effective methods. Other methods to be considered shall include evaluation, collection,

recordation, and analysis of any significant cultural materials in accordance with the AMP. The methods and results of evaluation or data recovery work at an archaeological find shall be documented in a professional-level technical report to be filed with the California Historical Resources Information System.

Work may commence within the vicinity of the discovery upon completion of evaluation, collection, recordation, and analysis as approved by the qualified archeologist.

3.2.6 Energy

Environmental Impacts	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
6. ENERGY. Would the project:				
a) Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation?	☐	☐	☒	☐
b) Conflict with or obstruct a State or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐

Environmental Setting

Marin County Unincorporated Area Climate Action Plan 2030

In 2018, the County Community Development Agency began a two-year planning process called Drawdown: Marin that engaged residents, businesses, and subject matter experts in a comprehensive, science-based county-wide campaign to identify actions that would dramatically reduce GHG emissions, address equity, and increase community resilience. Drawdown: Marin identified 29 climate change solutions in six focus areas: Renewable Energy, Transportation, Buildings and Infrastructure, Local Food and Food Waste, Carbon Sequestration, and Climate Resilient Communities. These solutions, along with strategies for addressing equity, community empowerment, and countywide collaboration on climate change, were published in the final *Drawdown: Marin Strategic Plan* in December 2020 (County of Marin 2020a), which was incorporated into the *Marin County Unincorporated Area Climate Action Plan 2030* (County of Marin 2020b). In 2022, Drawdown: Marin became the non-profit organization MarinCAN (County of Marin n.d.). The goals of the CAP are to 1) reduce emissions to 60 percent below 2005 levels by 2030 (equivalent to 53% below 1990 levels) and 2) draw down GHG emissions to below zero by 2045. The following CAP policies are relevant to the project.

RE-C2: GHG-Free Electricity

Encourage residents and businesses to switch to 100% renewable electricity (MCE Deep Green, MCE Local Sol, and PG&E Solar Choice) through engagement campaigns and partner agency incentives and work with MCE Clean Energy to assure that it reaches its goal to provide electricity that is 100% GHG-free by 2022.

RE-C3: Building and Appliance Electrification

Accelerate electrification of building systems and appliances that currently use natural gas, including heating systems, hot water heaters, stoves, ranges, and clothes dryers.

1. Explore opportunities to continue existing rebate programs, such as Electrify Marin.

2. Consider adopting an ordinance in 2024 that requires homeowners to replace natural gas appliances, such as water heaters, stoves, cooktops, clothes dryers, and heating systems with high efficiency electric appliances at time of replacement where feasible. Evaluate the financial impact on households at different income levels and consider offering rebates or subsidies, in partnership with electricity providers if available, for disproportionately impacted households.

Discussion

a) Would the Project result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Construction

The construction equipment and vehicles that would be used during construction of the proposed project would consume energy via combustion of petroleum products, including gas, diesel, and motor oil. Consumption of energy during construction would be temporary, lasting approximately 12 to 24 months. Indirect energy use would be required to make the materials and components used in construction. Indirect energy use includes energy used for extraction of raw materials, manufacturing, and transportation associated with manufacturing. Fuel use would be consistent with typical construction and manufacturing practices and would not require excessive or wasteful use of energy. Construction activities would be temporary and would require limited amounts of energy. Energy use for construction would not be wasteful, inefficient, or unnecessary as economics would lead the contractor to minimize the use of energy during construction. Impacts from energy use during construction would be less than significant.

Operation/Occupancy

The project would consist of 54 affordable housing units within the 12 existing buildings. The proposed residential units would be all electric, and no gas appliances are proposed, which is consistent with CAP Policy RE-C3. The conversion of the project to all-electric use would require upgrades to the electrical infrastructure. Existing underground PG&E powerlines connecting to each building would remain. However, existing electrical metering panels would be replaced with a new exterior residential multi-meter panel. In addition, the three existing PG&E in-ground transformer vaults within the project site would be upgraded to accommodate the all-electric load.

New solar panels would be installed on all buildings, and two ground-mounted solar arrays are proposed along the east side of Commodore Webster Drive and on the hillside west of Buildings 101, 102, and 103. The proposed 558,000 kWh solar photovoltaic (PV) system has been sized to offset 100 percent of the projected energy consumption of the project, including all

electric residences, the resident services building, a wastewater treatment plant, and EV charging loads. An 80 kW BESS and backup diesel generator are also proposed. A microgrid consisting of a portion of the PV system, a BESS, a generator, and the related electrical infrastructure would provide power to Building 1 and the wastewater treatment plant. The rooftop solar and BESS is consistent with CAP Policy RE-C2, which encourages new development to transition to 100 percent renewable energy. The microgrid would allow Building 1 to serve as a neighborhood-level resilience center to provide shelter and resources during climate and other emergencies. While there would remain emergency backup generators at the site, the generators would only operate under emergency conditions when power is not available via either PG&E power lines or the on-site solar and BESS and would not result in wasteful, inefficient, or unnecessary consumption of energy resources. The proposed features would improve energy reliability and efficiency on site and would be consistent with the goals and policies of the CAP. Therefore, the project would not require inefficient or wasteful use of energy. Impacts would be less than significant.

b) Would the Project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Refer to response a), above. The project would convert the existing residential units from natural gas supply to electric, which is consistent with CAP Policy RE-C3. The conversion of residential units from natural gas supply to electric supply also complies with the California Air Resources Board (CARB) requirement that new homes include all electric furnaces, stoves, and other appliances by 2026 to help reduce the state's carbon footprint and improve air quality (CARB n.d.). The project would include solar and BESS, which helps the project meet renewable energy adoption goals (CAP Policy RE-C2). The use of solar and BESS energy supply qualifies for the California Electric Homes Program (AB 137), which provides incentives for the construction of all-electric market-rate residential buildings and installation of energy storage systems to encourage deployment of near-zero-emission building technologies (California Energy Commission (CEC) 2022).

In addition, the proposed project would comply with California Building Code Title 24 energy efficiency standards. Electrical power would be provided by PG&E, who is required to meet requirements for compliance with California's Renewables Portfolio Standard (RPS). Because the proposed project would install renewable energy, it would not conflict with or obstruct the State plan for renewable energy and would follow state requirements for energy efficiency. The impact from conflict with a state or local plan for renewable energy or energy efficiency would be less than significant.

Mitigation Measures

None required.

3.2.7 Geology and Soils

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

Environmental Setting

A geotechnical investigation was prepared for the project in 2022 (Rockridge Geotechnical 2022), which is enclosed in Appendix E. The geotechnical investigation included subsurface testing by drilling four test borings, performing laboratory testing on selected soil samples, and

performing engineering analyses to develop conclusions and recommendations. Below are the findings of the geotechnical investigation:

Test Borings
Subsurface conditions at the site were explored by drilling four test borings. The borings were drilled at a depth of 21.5 feet *below ground surface* (bgs) using a limited-access drill rig equipped with 4-inch-diameter solid-stem flight augers. During drilling, the field engineer logged the soil encountered and obtained representative samples for visual classification and laboratory testing.

Laboratory Testing
The soil and bedrock samples were obtained from the borings to confirm the field classifications and selected representative samples for laboratory testing. Soil samples were tested by Construction Materials Testing, Inc. of Livermore, California, to measure moisture content, dry density, Atterberg limits, particles passing the No. 200 sieve, and *resistance value* (R-value). Soil samples were also tested by Project X Corrosion Engineering of Murrieta, California, to measure corrosivity potential. The results of the laboratory tests are presented on the boring logs in the geotechnical investigation (Rockridge Geotechnical 2022).

Geologic Units
The project site lies within the Coast Ranges Geomorphic Province, which extends approximately 550 miles in a northwest to southeast direction along the coast of California. The Coast Ranges comprise a series of northwest to southeast trending ridges and narrow valleys, whose orientations are controlled by the fault-dominated geologic structure of the region. Point Reyes Station and the project site are located with the Lagunitas Creek Valley, which drains into Tomales Bay to the north. Point Reyes Station is bounded by quaternary alluvium deposits to the west and cretaceous sandstone and shale of the Bolinas Ridge to the east and is underlain by older Quaternary alluvium (Essel Environmental Engineering & Consulting 2021).

The project site is underlain by older Quaternary alluvial deposits that are present over a significant proportion of Point Reyes Station. These deposits consist of poorly sorted coarse sand and gravel, and moderately sorted fine sand, silt, and clay, and have a specific yield of 8 to 17 percent. The project site is located near the southern edge of Point Reyes Station and is at an approximate elevation of 31 feet above mean sea level and surface topography in the area of the site slopes downward toward the southwest (Essel Environmental Engineering & Consulting 2021).

Seismicity
The proposed project is located within a seismically active region. The San Andres Fault, which is the largest and potentially destructive fault in the state, is located approximately 0.8 mile southwest of the project site (Figure 3.2-1). According to the Marin Countywide Plan, the project site is located within Soil Type E, which is the soil type that is expected to have the strongest amplification from shaking. This soil type includes water-saturated mud and artificial soil (County of Marin 2007).

Liquefaction

Liquefaction is a phenomenon in which granular material is transformed from a solid state to a liquefied state as a consequence of increased pore-water pressure and reduced effective stress. Increased pore-water pressure is induced by the tendency of granular materials to densify when subjected to cyclic shear stresses associated with earthquakes.

Liquefaction potential varies significantly, and site-specific analysis is needed to accurately determine liquefaction potential in earthquake-prone areas. According to the Marin Countywide Plan, the project site is located within an area designated as very high for susceptibility for liquefaction (County of Marin 2007; Figure 3.2-2). The site-specific geotechnical investigation determined that the potential for liquefaction and ground failures associated with liquefaction, including lateral spreading, to occur at the site during a seismic event is low due to the high relative density and/or cohesion of the soil below the design groundwater level (County of Marin 2007).

Landslides

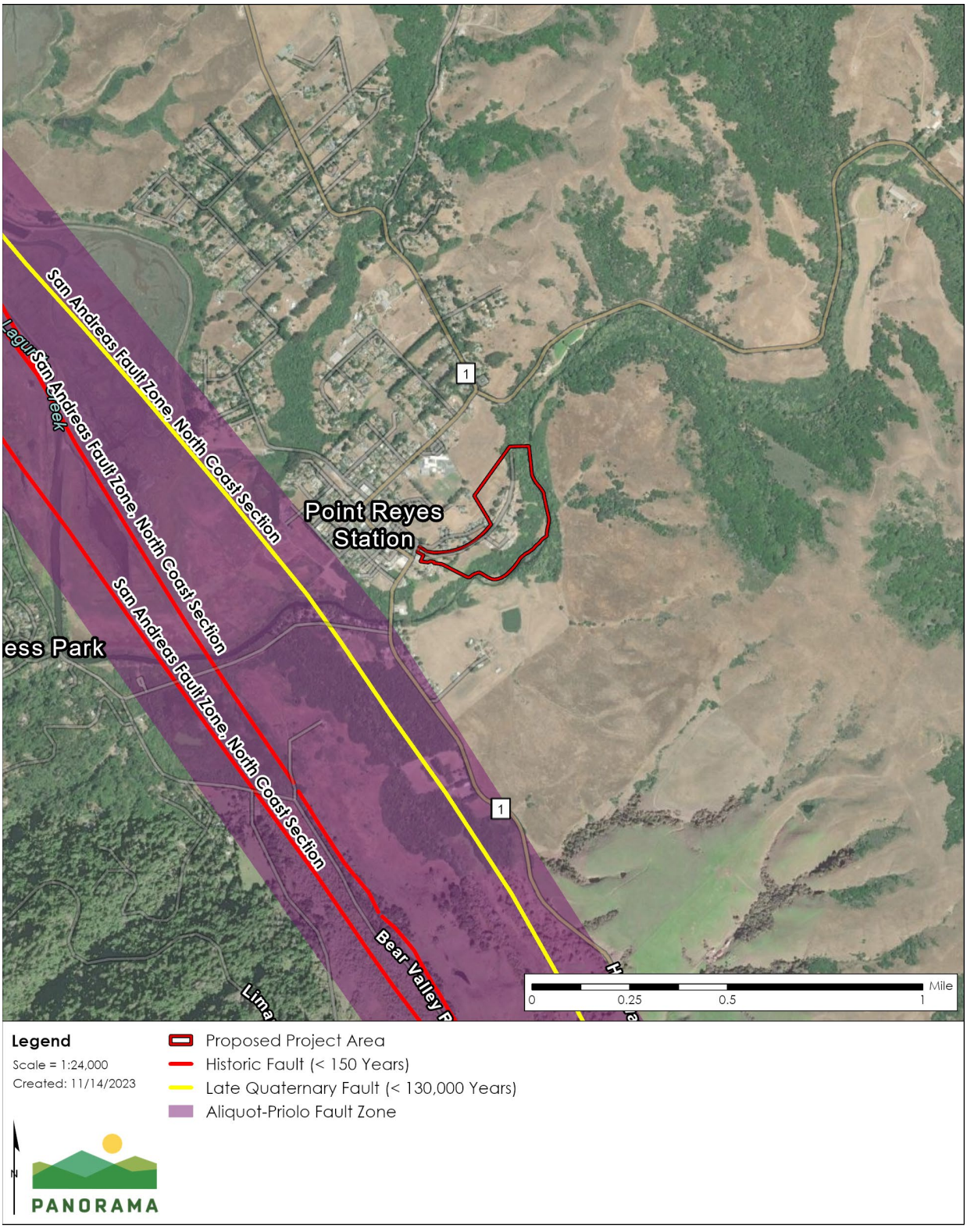
Seismically induced landslides may be triggered by both natural and human-induced changes to the environment, which can create slope instability. The risk of landslide hazard is greatest in areas with steep, unstable slopes. Slopes within the project area range from 2 percent to 7 percent and is gently sloping to the southeast. According to the Marin Countywide Plan, the project site is located within an area designated as few landslides, which means there is a low potential for landslides including seismically induced landslides (County of Marin 2007).

Soils

A total of five distinct soil units are mapped within the project area. Table 3.2-7 provides information on the soil types found on the project site. The soil types are well drained or somewhat excessively drained apart from one soil unit, the Xerorthents-Rock outcrop complex, which is considered excessively drained. The majority of the project is located within soil unit 203 Xerorthents fill, which does not have a hydric soil rating (Soil Survey Staff, Natural Resources Conservation Service, United States Department of Agriculture, n.d.).

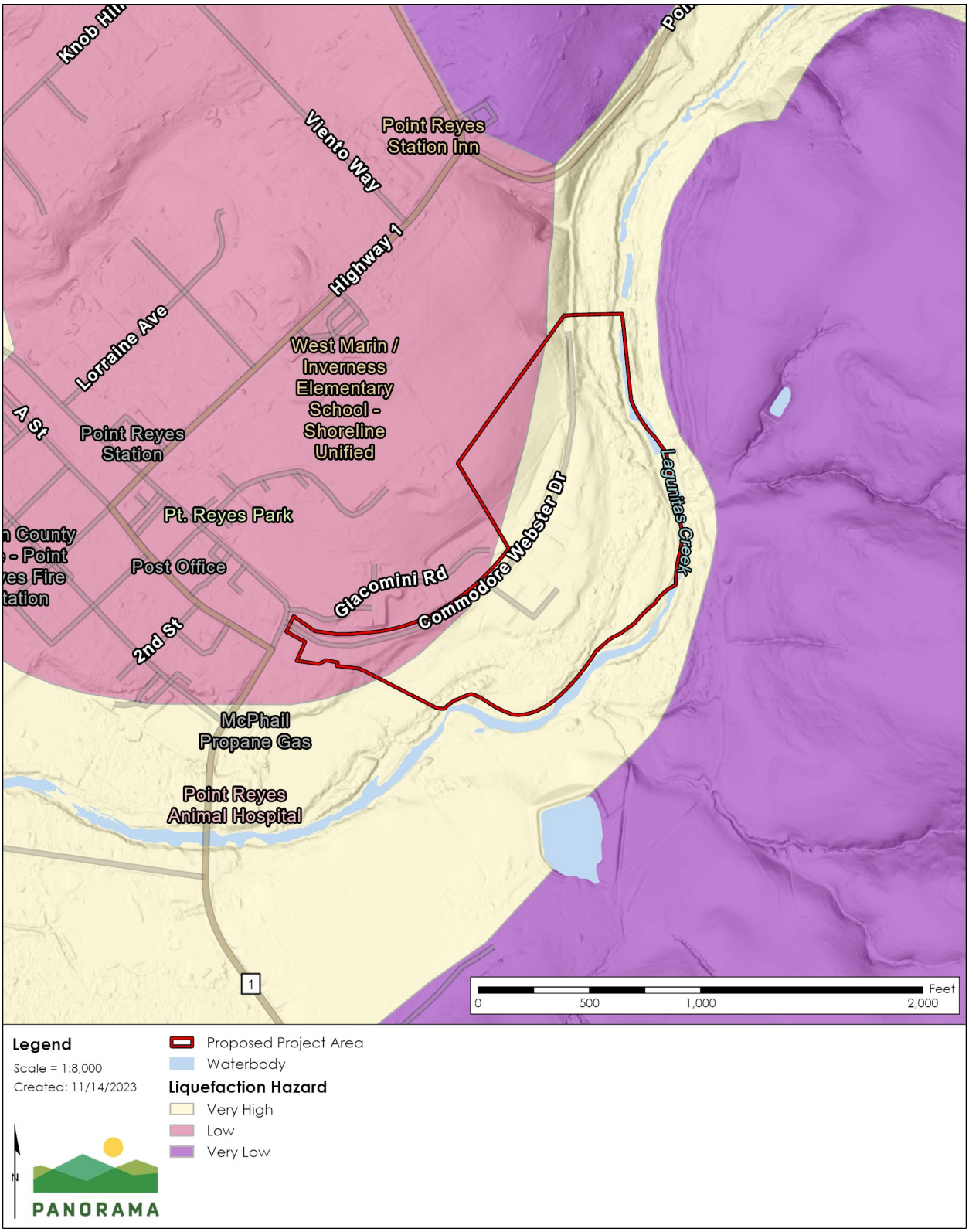
The native soil encountered in the borings consisted of medium dense to dense clayey sand with varying gravel content, dense clayey gravel with sand, dense sand, and hard sandy clay with gravel. Below the native soil, the borings found either residual soil (i.e., decomposed bedrock) consisting of very stiff to hard sandy clay or deeply to completely weathered Franciscan mélange bedrock (Rockridge Geotechnical 2022). All clays are susceptible to some shrinkage and swelling due to changes in moisture content.

Figure 3.2-1 Fault Zones



Source: (Maxar, 2021; Siegal & Strain Architects, 2023; California Department of Conservation: California Geological Survey, 2005; California Geological Survey, 2012)

Figure 3.2-2 Liquefaction Hazard



Source: (USGS, 2012; ESRI, 2011; Carl M. Wentworth, Robert S. Nicholson, Heather M. Wright, and Katherine M. Brown, 2023)

Table 3.2-7 Mapped Soil Units in the Study Area

Map unit symbol	Soil unit	Acres	Percent of project area	Hydric rating	Drainage class
105	Blucher-Cole complex, 2 to 5 percent slopes	1.1	3.3%	C/D	Somewhat poorly drained
114	Cortina gravelly sandy loam, 0 to 6 percent slopes, cool, MLRA 15	17.0	51.8%	A	Somewhat excessively drained
148	Olompali loam, 2 to 9 percent slopes	1.7	5.2%	D	Somewhat poorly drained
161	Saurin-Bonnydoon complex, 2 to 15 percent slopes	1.2	3.5%	C	Well drained
203	Xerorthents, fill	11.8	36.1%	N/A	N/A

Source: (NRCS Staff, n.d.)

Paleontology

Most of the project site is underlain by late Holocene-age (<4,200 years ago) alluvium (Qhy), which is a depositional landform has the capability of burying former land surfaces during alluvial and fluvial events (e.g., episodic flooding) in the Holocene geologic time period (>11,700 years ago). Holocene age alluvium is too young to support fossils. However, the remaining portions of the project site are underlain by Pleistocene-age alluvium (Qpa) and marine terrace deposits (Qt), which have the potential to support paleontological resources. Paleontological records at the U.C. Museum of Paleontology include 15 specimens of invertebrates associated with marine environments from similar geologic units in the Point Reyes area (U.C. Museum of Paleontology, n.d.).

Discussion

a) Would the Project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist–Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42?

The project site is not located on an Alquist-Priolo earthquake fault. The project is in proximity to the San Andreas fault, but the fault does not underlie the site. Therefore, rupture of an earthquake fault would not affect the project site. No impact would occur from rupture of an earthquake fault.

ii) Strong seismic shaking?

Construction
The proposed project is located immediately adjacent the San Andres Fault (County of Marin 2007). The project area could experience very strong intensity ground shaking during a large earthquake. Severe ground shaking resulting from earthquakes has the potential to cause injury to construction workers during construction. However, given the relatively short construction period (1 to 24 months), the potential for strong seismic shaking during the construction period is considered low. Precautionary measures including adherence to state-mandated safety standards, including federal Occupational Safety and Health Administration (OSHA) regulations (29 CFR section 1910.120) and California OSHA regulations (8 CCR Title 8 section 5192) during construction would minimize hazards to construction workers associated with strong seismic ground shaking.

Operation/Occupancy
As discussed above, because of proximity to the San Andreas Fault, the project has the potential to experience very strong ground shaking during an earthquake. The project would reintroduce human occupancy to the project site through development of the proposed affordable housing units. The residential units/upgrades would need to comply with current California Building Code (CBC) requirements and standard industry practices, including geotechnical requirements for residential buildings. In addition, the geotechnical investigation includes site-specific recommendations for site preparation and grading, foundation design, pavement design, seismic design, and other geotechnical aspects of the project (Rockridge Geotechnical 2022). Because of the potential for strong seismic shaking of the life of the project, there is a potential for substantial adverse effects from occupancy of the site should the geotechnical recommendations not be properly implemented in the final design. Mitigation Measure GEO-1 requires implementation of the geotechnical recommendations in the final design to avoid significant impacts from strong seismic ground shaking. With implementation of mitigation measure GEO-1 and compliance with the current CBC requirements, the impacts of strong seismic ground shaking would be less than significant with mitigation.

iii) Seismic-related ground failure, including liquefaction?

The project site is located within an area designated as very high susceptibility for liquefaction (County of Marin 2007). However, analysis in the geotechnical investigation determined that the potential for liquefaction and ground failures associated with liquefaction, including lateral spreading, to occur at the site during a seismic event is low due to the high relative density and/or cohesion of the soil below the design groundwater level (Rockridge Geotechnical 2022).

In addition, the proposed improvements would be supported on conventional spread footings bearing on the existing fill or on new fill if placement of new fill is required to raise grades. Continuous footings would be at least 16 inches wide, and isolated footings would be at least 18 inches wide. If unsuitable bearing material is encountered at the bottom of footing excavations,

as determined by the field engineer, the unsuitable material would be removed until competent bearing soil is reached.

The residential units would also comply with current CBC requirements. Because of the low potential for liquefaction at the site based on geotechnical evaluation, and because of the use of spread footing foundations for the residential buildings, as well as current CBC requirements, the impact from liquefaction would be less than significant.

iv) Landslides?

The project site is located within a gently sloping area designated as "few landslides," which means there is a low potential for landslides (County of Marin 2007). The project site is in an urbanized area and currently supports existing residential buildings. Landslides are not expected on the project site due to the flat terrain (absence of steep slopes); therefore, impacts from landslides would be less than significant.

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

The majority of the project facilities are located within existing developed areas, and disturbance to topsoil would be limited. Development of the project would require minor vegetation removal, including removal of 37 trees, which could cause some erosion and loss of topsoil. Excavation and grading activities to construct the new wastewater treatment system, solar array, and bioretention areas could also result in a temporary increase in erosion. It is anticipated that the majority of the existing native soil and bedrock would be used as engineered fill on site, and the area of grading and excavation would occur primarily in existing developed areas that do not contain native topsoil. Table 3.2-8 provides the estimated grading quantities for the proposed project.

Table 3.2-8 Estimated Grading Quantities

Structure/area	Fill volume (cu. yd.)	Cut volume (cu. yd.)	Net volume (cu. yd,)
Rain garden 2 and 3	4	171	-167
Outdoor classroom	112	-	112
Middle parking lot	80	29	51
New sidewalks (near building 100A and 201)	170	nil	170
Community garden	60	nil	60
Total	**426**	**200**	**226**

Soil erosion and topsoil loss would also be limited by implementing standard construction practices and *best management practices* (BMPs) for erosion and sediment control. The project would be required to obtain coverage under the Construction General Permit (Order 2022-0057-

DWQ) and prepare a Stormwater Pollution Prevention Plan (SWPPP) due to disturbance of more than 1 acre of land. The SWPPP would include erosion control measures that protect exposed slopes and drainage inlets. The SWPPP would contain soil stabilization and sediment control BMPs required to be implemented during construction. The new bioretention areas within the project site and additional trees and vegetation planted on the project site would provide long-term soil and erosion control on the site. Because erosion control BMPs would be implemented during construction and the project would implement new stormwater bioretention basins as well as landscaping to provide permanent erosion control, the impact from erosion or loss of topsoil would be less than significant.

c) Would the Project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project and, potentially, result in on- or offsite landslide, lateral spreading, subsidence, liquefaction, or collapse?

Liquefaction and Lateral Spreading

Lateral spreading is commonly associated with liquefaction, causing soil mass to move down slopes. As discussed under impact discussion a)(iii), the geotechnical investigation analyzed the liquefaction and lateral spreading potential of soil encountered below groundwater at the site using data collected at the test borings and determined that the potential for liquefaction and ground failures associated with liquefaction, including lateral spreading, to occur at the site during a seismic event is low due to the high relative density and/or cohesion of the soil below the design groundwater level (Rockridge Geotechnical 2022). Because the potential for liquefaction and lateral spreading would be low at the site, the project would not become unstable due to lateral spreading or liquefaction, and the impact from lateral spreading or liquefaction would be less than significant.

Landslides

Refer to impact discussion a)(iv), above, for more information on landslides. The project area is relatively flat and not prone to landslides. Impacts from landslides would be less than significant.

Subsidence and Collapse

Subsidence is the vertical displacement of the ground's surface caused by the extraction of large volumes of fluid (water or petroleum products) from deep in the ground or caused by the collapse of underground mines. Subsidence caused by groundwater withdrawal can occur in unconsolidated to semi-consolidated sediments containing confined or semi-confined sand and gravel aquifers inter-bedded with clay sediments.

NMWD obtains its water supply for the West Marin service area from two wells located on the nearby Gallagher Ranch and two wells located on the project site. The project would not install any new groundwater wells at the site. The geotechnical investigation analyzed the subsidence potential of soil encountered below groundwater at the site using data collected at the test borings. Analysis determined that the potential for subsidence is low due to the high relative density and/or cohesion of the soil below the design groundwater level (Rockridge Geotechnical

2022). Because the potential for subsidence at the site is low and the project would not require new groundwater wells, the project would not cause subsidence or become unstable due to subsidence, and impacts would be less than significant.

d) Would the Project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

Expansive soils shrink and swell as a result of moisture changes and can cause heaving and cracking of flatwork and pavement. Expansive soils tend to be soils that contain clay minerals, such as montmorillonite.

Based on the results of the field investigation and test borings at the project site, the fill in the project area consisted of medium dense to dense clayey sand and very stiff to hard clay, with varying sand and gravel content. The fill appeared to be well compacted, and tests performed on two samples of the near-surface clay at depths of 1.5 and 4 feet bgs resulted in plasticity indices (PI) of 4 and 9, respectively, indicating the clay has a low expansion potential (Rockridge Geotechnical 2022). Accordingly, expansive soils are not expected to be found within the project site, and the impact from location on expansive soils would be less than significant.

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

Sewer service is not available in the project area. The project site currently contains below-ground tanks for limited on-site sewage collection and storage only. When the property was used for USCG housing, wastewater was collected and transported to an off-site facility for disposal on a daily basis.

The project is proposing to use an alternative wastewater system to treat wastewater at the site. Sherwood Design Engineers (SDE) prepared a *basis of design* (BOD) report to evaluate the proposed wastewater management approach for the project that would include the installation of a new enhanced wastewater treatment system to produce high-quality effluent that can be reused for landscape irrigation around the site (Sherwood Design Engineers 2022). The project would primarily use the treated wastewater as irrigation during the growing season and would also utilize new leach fields that would be used as a backup disposal system during periods of rainfall or when the irrigation system is being maintained.

The site has soils with an average percolation rate of greater than 5 minutes per inch, and Marin County septic regulations allow a minimum depth to groundwater of 3 feet for a conventional septic system with these soil characteristics (Questa Engineering Corp., 2023). The size of the system was determined in the BOD by analyzing *soil application rates* (SAR). Soils investigation of the site indicate a SAR of 0.4 gpd per square foot (gpd/sf) for the soils in the building area. A system sized to accommodate the maximum occupancy day flow of 10,000 gpd using a SAR of

0.4 gpd/sf would require 25,000 square feet. Given the ample landscaped area on the site, this approach is considered achievable. The vegetation plants within fields would be able to tolerate the level of soil saturation expected equivalent to 0.4 gpd/sf during the growing season. The leach field has been sized to accommodate 100 percent of the volume of the wastewater system, and the depth to groundwater is 6 to 8 feet bgs. The project has soils capable of adequately supporting the alternative wastewater disposal system where sewers are not available for the disposal of wastewater, and impacts would be less than significant.

f) Would the Project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Portions of the project site are underlain by *Pleistocene age alluvium* (Qpa) and *marine terrace* (Qt) deposits. The proposed wastewater treatment system in the western portion of the project site and the existing development is located within the recent Pleistocene age alluvium, which are not sensitive for paleontological resources due to the young age of the sediments. Construction activities such as grading, excavation, and ground-disturbing activities within Pleistocene age alluvium would not impact paleontological resources because the sediments are too young to contain produce fossils. There are no known paleontological resources or unique geologic features at the proposed project site; however, there are localities of paleontological specimens in the Point Reyes area in similar geologic units. The majority of the project site is currently developed, so the underlying soils were also previously disturbed in the developed areas during construction of the USCG housing. In addition, the depth of new grading and disturbance would be minimal (approximately 4 feet); however, there is a potential that paleontological resources could be encountered during excavation. Marin Development Code section 22.20.040.E requires that construction activities to cease if a paleontological resources is discovered during construction, the County shall be notified so that the extent and location of discovered materials may be recorded and disposition may occur in compliance with State and federal law. Because the project would comply with Marin Development Code including Section 22.20.040.E, the impact on paleontological resources would be less than significant.

Mitigation Measures

Mitigation Measure GEO-1: Implement Geotechnical Recommendations in Final Design
The applicant shall incorporate the following recommendations of the geotechnical investigation into the final design:

- Site preparation and grading: In areas that will receive fill or improvements (i.e., pavement, foundations, or concrete flatwork), the soil subgrade would be scarified to a depth of at least 8 inches, moisture-conditioned to above optimum moisture content, and compacted to at least 90 percent relative compaction. The upper eight inches of soil subgrade for vehicular pavements should be compacted to at least 95 percent relative compaction and be non-yielding.
- Utility trench backfill: All trenches would conform to the current CAL-OSHA requirements. Pipes and/or conduits would be bedded on a minimum of 4 inches of clean sand or fine gravel. After the pipes and/or conduits are tested, inspected (if

required) and approved, all trenches would be covered to a depth of 6 inches with clean sand or fine gravel, which should be mechanically tamped. Backfill for utility trenches and other excavations is also considered fill and should be placed and compacted according to the recommendations previously presented.

- Exterior concrete flatwork: Exterior concrete flatwork that would not receive vehicular traffic (i.e. sidewalk) would be underlain by at least 4 inches of Class 2 aggregate base compacted to at least 90 percent relative compaction. Prior to placement of the aggregate base, the upper eight inches of the subgrade soil should be scarified, moisture-conditioned to near optimum moisture content, and compacted to at least 90 percent relative compaction.
- Spread footing: The existing buildings are assumed to be supported on spread footings bottomed in the existing fill; however, some footings may extend into the native soil. If new loads are imposed on the existing footings, test pits would be excavated to determine the depth and width of the footings.
- Proposed improvements may be supported on conventional spread footings bearing on the existing fill or on new fill if placement of new fill is required to raise grades. Continuous footings should be at least 16 inches wide, and isolated footings should be at least 18 inches wide.
- Concrete slab-on-grade floors: The subgrade for new slab-on-grade floors would be prepared in accordance with recommendations in Section 8.1 of the geotechnical investigation (Rockridge Geotechnical 2022). Where water vapor transmission through the new floor slab is not desirable, the project would install a capillary moisture break and water vapor retarder beneath the floor slab. A capillary moisture break consists of at least 4 inches of clean, freed raining gravel or crushed rock.
- Permanent retaining walls: Retaining walls would be designed to resist static lateral earth pressures, lateral pressures caused by earthquakes, and traffic loads (if vehicular traffic is expected within a horizontal distance equal to 1.5 times the wall height). All on-site walls, including low retaining walls in landscaped areas, would be designed in accordance with the recommendations presented in the geotechnical investigation; however, checking the walls for seismic loading is not required for walls less than 6 feet high.

3.2.8 Greenhouse Gas Emissions

Environmental Impacts	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
8. GREENHOUSE GAS EMISSIONS. Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b) Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

Environmental Settings

Greenhouse gases (GHGs) are global pollutants that can increase atmospheric temperatures, leading to global climate change. The increased temperatures associated with climate change results in changes in snow and rainfall patterns and an increase in droughts, tropical storms, and heavy rain events. The following pollutants are the most prominent GHGs that have been identified as contributing to global climate change: carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF_6).

The County of Marin adopted the *Marin County Unincorporated Area Climate Action Plan 2030* (CAP) in December 2020. The goals of the CAP are to (1) reduce emissions 60 percent below 2005 levels by 2030 (equivalent to 53% below 1990 levels) and (2) drawdown GHG emissions to below zero by 2045.

Discussion

a) Would the Project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

The project includes the redevelopment of the site into 54 affordable housing units. Construction activities include site preparation, demolition, grading, and architectural coating. Individual project's GHG emissions do not generally result in noticeable change in global climate; however, successive projects over time can contribute to potentially significant impacts.

The BAAQMD has established thresholds of significance for climate impacts from GHG emissions. The BAAQMDs approach determines whether an individual project's GHG emissions would be cumulatively considerable by establishing a "fair share" approach. If a project contributes its "fair share" to achieving GHG reduction goals, then the project's impact on global climate change is considered less than significant. The project-level thresholds are detailed in Table 3.2-9 below. If a project complies with the BAAQMD threshold, it is considered to have a less-than-significant impact.

Table 3.2-9 Climate Thresholds of Significance (Project Level)

Thresholds of Significance for Land Use Projects (Must Include A or B)
A. Projects must include, at a minimum, the following project design elements: 1. Buildings a. The project will not include natural gas appliances or natural gas plumbing (in both residential and nonresidential development). b. The project will not result in any wasteful, inefficient, or unnecessary energy use as determined by the analysis required under CEQA Section 21100(b)(3) and Section 15126.2(b) of the State CEQA Guidelines. 2. Transportation c. The project will achieve a reduction in project-generated vehicle miles traveled (VMT) below the regional average consistent with the current version of the California Climate Change Scoping Plan (currently 15 percent) or meet a locally adopted Senate Bill 743 VMT target that reflects the recommendations provided in the Governor's Office of Planning and Research's Technical Advisory: Evaluating Transportation Impacts in CEQA: i. Residential projects: 15 percent below the existing VMT per capita ii. Office projects: 15 percent below the existing VMT per employee iii. Retail projects: no net increase in existing VMT d. The project will achieve compliance with off-street electric vehicle requirements in the most recently adopted version of CALGreen Tier 2.
B. Projects must be consistent with a local GHG reduction strategy that meets the criteria under State CEQA Guidelines Section 15183.5(b).

Source: (BAAQMD 2022)

The project would be all electric and would not include natural gas appliances or plumbing. Further, the project would include 558,000 kWh solar PV system, which would offset 100 percent of the projected energy consumption of the project, including all electric residences, the resident services building, a wastewater treatment plant, and EV) charging loads. While the project would include a diesel backup generator, the generator would be used only in emergencies when there is no power from PG&E and the BESS is not sufficient. Because the project does not include natural gas pipelines and would not result in wasteful or inefficient use of energy, the project would comply with threshold of significance A(1). As an affordable housing project, it is assumed that the project would have a less-than-significant VMT impact, as detailed in Section 3.2.17 Transportation, below. The project also includes charging stations for EVs. The project therefore meets threshold of significance A(2).

As discussed in Section 3.2.6 Energy, above, the project is also consistent with the CAP, which has several policies that encourage and residential projects to be all electric and provide 100 percent renewable energy which, as noted above and detailed in Section 3.2.6, the project complies with. Therefore, the impact from generation of GHG emissions would be less than significant.

b) Would the Project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

The CAP incorporates State reduction strategies to reduce community emissions from 2018 levels. The project would not conflict with applicable CAP and State policies for reducing emissions of GHGs. As detailed in Section 3.2.6, the project would comply with Policy RE-C2 and RE-C3 as the project would convert the existing residential units from natural gas supply to electric. The project would comply with CAP Policy RE-C2 as the project would include solar and BESS, which would help the project meet renewable adaptation goals detailed in Policy RE-C2. CAP policies WC-C1 and CBE-C2 are also applicable to the project.

- WC-C1: Community Water Use: Reduce indoor and outdoor water use in residential and commercial buildings and landscaping.
    1. Work with water districts and other organizations to promote water conservation programs and incentives.
    2. Educate residents and businesses about local and State laws requiring retrofit of non-compliant plumbing fixtures during remodeling and at resale.
    3. Ensure all projects requiring building permits, plan check, or design review comply with State and water district regulations.
    4. Encourage the installation of greywater and rainwater collection systems and the use of recycled water where available through ordinance and/or engagement campaigns.
    5. Investigate potential on-bill financing for water conservation measures, such as the Bay Area Regional Energy Network's (BayREN's) Water Upgrades Save Program.
    6. Encourage water districts to upgrade water meters to facilitate more granular and real-time water tracking data to better understand water use and detect leaks.
- CBE-C2: Deconstruction of Buildings: Deconstruction is the process of taking apart, rather than demolishing, buildings to salvage components and minimize landfill disposal. Deconstruction policies can vary based on common building types in a given community. The County will explore the development of a deconstruction ordinance. Similar policies adopted in Portland, Oregon focus on single-family residences built prior to 1940, which tend to have high quality materials such as old growth wood and decorative finishes. A deconstruction policy must be paired with economic development work to ensure that there are qualified contractors who can fulfill the requirements of an ordinance, and a market for the materials recovered. The County will participate in relevant regional working groups seeking to explore Bay Area-wide policies and programs for deconstruction, which may offer economies of scale. In addition, explore policies that outline new building standards with end of life in mind, and opportunities to promote

adaptive reuse, which can decrease the development of new buildings that will be directed to the landfill at the end of their life

The project would use recycled water for landscaping in compliance with CAP Policy WC-C1. In addition, the project would repurpose an existing residential facility and convert the existing structures into 54 residential units, which would minimize demolition waste consistent with CAP Policy CBE-C2. Because the project would be consistent with all applicable CAP policies and the CAP was adopted to attain GHG reduction goals, the project would not conflict with a policy or plan adopted for the purpose of reducing GHG emissions, and the impact would be less than significant.

Mitigation Measures

None required.

3.2.9 Hazards and Hazardous Materials

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

Environmental Setting

As used in this section, the term *hazardous material* is defined as any material that, because of its quantity, concentration, or physical or chemical characteristics, poses a significant present or potential hazard to human health and safety or to the environment if released into the workplace or the environment. As used in this section, the term *hazardous waste* generally refers to a hazardous material that has been used for its original purpose and is about to be discarded or recycled. In California, a hazardous waste is defined as a waste, or combination of wastes,

that, due to its quantity, concentration, or physical, chemical, or infectious characteristics, may either:

- Cause, or significantly contribute to, an increase in mortality or an increase in serious irreversible, or incapacitating reversible, illness; or
- Pose a substantial present or potential hazard to human health or the environment when improperly treated, stored, transported, disposed of, or otherwise managed.

Federal and State regulations require adherence to specific guidelines regarding the use, transportation, disposal, and accidental release of hazardous materials. The EPA is responsible for administering the federal Toxic Substances Control Act and the Resource Conservation and Recovery Act (RCRA), which regulate the generation, transportation, treatment, storage, and disposal of hazardous waste. The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) is a federal database that records the known hazardous contaminated sites and facilitates remediation actions. The management of hazardous materials and waste within California is under the jurisdiction of CalEPA, which coordinates the State's Unified Program for permitting, inspecting, and enforcing regulations related to hazards materials.

Marin Countywide Plan

The Marin Countywide Plan is the comprehensive long-range general plan that guides land use and development in the unincorporated areas of Marin County (County of Marin 2007). Goals and policies related to the project and the hazards and hazardous materials analysis are listed below. Consistency with these goals and policies was considered during evaluation of potential project impacts.

- **Goal EH-1**: Hazard Awareness. Raise public awareness and responses about potential environmental hazards.
  - **Policy EH-1.3**: Identify Evacuation Routes. Provide the public with information identifying accessible evacuation routes for fire, geologic, and other hazards.
- **Goal EH-4**: Safety from Fires. Protect people and property from hazards associated with wildland and structural fires.
  - **Goal PS-4**: Decreased Exposure to Hazardous Materials. Reduce the risks to human and environmental health from hazardous materials.
  - **Policy PS-4.1**: Regulate and Reduce Hazardous Material Use. Control the use and storage of hazardous materials to minimize their presence in, and potential dangers to, the community and environment.

Marin Operational Area Emergency Operations Plan

The Marin Operational Area (OA) Emergency Operations Plan (EOP) addresses the planned response to extraordinary emergency situations associated with large-scale disasters affecting Marin County (Marin County Sheriff's Office of Emergency Services 2014). Specifically, the EOP does the following:

- Establishes the emergency management organization required to mitigate any significant emergency or disaster affecting the Marin OA

- Establishes the overall operational concepts associated with Marin County's Emergency Operations Center (EOC) activities and the recovery process

The EOP identifies how the Marin County emergency operational system fits into the overall California and national risk-based, all-hazard emergency response and recovery operations plan (Marin County Sheriff's Office of Emergency Services 2014). The EOP incorporates annexes for specific disaster response issues, such as post-disaster housing, spontaneous volunteers, tsunami, medical/health, bioterrorism, oil spill, extreme temperature, mass fatality, and mass care and shelter.

Marin County Multi-jurisdictional Local Hazard Mitigation Plan

The Marin County Multi-Jurisdictional Local Hazard Mitigation Plan (MCM LHMP) presents environmental hazard analysis, describes important transportation and utility infrastructure at risk from environmental hazards, and describes emergency evacuation systems and mitigation actions to protect Marin County populations and infrastructure from environmental hazards (Marin County Sheriff's Office of Emergency Services 2018). The Marin Countywide Plan complies with all requirements of the MCM LHMP. The MCM LHMP Planning Committee developed mitigation actions based on the MCM LHMP's hazard analysis, vulnerability analysis, and capability assessments. The mitigation actions in the MCM LHMP would be implemented over the lifespan of the project. The relevant mitigation actions are provided below:

- LS-1: Increase efforts to reduce landslides and erosion in existing and future development by improving appropriate code enforcement and use of applicable standards for private property, such as those appearing in the California Building Code, California Geological Survey Special Report 117 – Guidelines for Evaluating and Mitigating Seismic Hazards in California, American Society of Civil Engineers (ASCE) report Recommended Procedures for Implementation of DMG Special Publication 117: Guidelines for Analyzing and Mitigating Landslide Hazards in California, and the California Board for Geologists and Geophysicists Guidelines for Engineering Geologic Reports. Such standards should cover excavation, fill placement, cut-fill transitions, slope stability, drainage and erosion control, slope setbacks, expansive soils, collapsible soils, environmental issues, geological and geotechnical investigations, grading plans and specifications, protection of adjacent properties, and review and permit issuance.
- MLT-9: Develop and implement energy assurance plans. May include backup generators, energy storage (e.g. diesel fuel tanks), and microgrids for critical facilities.

Unified Program

The Unified Program is a consolidation of multiple environmental and emergency management programs, allowing for local oversight and enforcement by a Certified Unified Program Agency (CUPA). The Marin County CUPA administers the Unified Program in the project area. The Unified Program consolidates the following programs (CalEPA 2022):

- Aboveground Petroleum Storage Act Program
- Area Plans for Hazardous Materials Emergencies
- California Accidental Release Prevention Program
- Hazardous Materials Release Response Plans and Inventories (Business Plans)
- Hazardous Material Management Plan and Hazardous Materials Inventory Statements
- Hazardous Waste Generator and Onsite Hazardous Waste Treatment (tiered permitting) Programs
- Underground Storage Tank Program

Previous Environmental Documentation
An Environmental Compliance Due Diligence Activities Report was prepared for the site in November 2016 (Tetra Tech 2016). This report consisted of a Phase I Environmental Site Assessment (ESA), Subsurface Investigation, Asbestos-Containing Survey and Condition/Risk Assessment, Lead-Based Paint Inspection and Risk Assessment, Lead in Soil Sampling Assessment, and NEPA Report for the Site. In 2021, Essel Environmental Engineering & Consulting (Essel) prepared a new Phase I ESA for the project site (Essel Environmental Engineering & Consulting 2021). The 2021 Phase I ESA included review of previous reports for the site (listed above), historical aerial photographs, hazardous records search, and available online materials.

The following is a summary of the relevant reports:

- **Phase I ESA**: A Phase I ESA is designed to identify *recognized environmental conditions* (RECs) in connection with the previous and current uses and ownership of a site. An REC is defined as the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property 1) due to any release to the environment; 2) under conditions indicative of a release to the environment; or 3) under conditions that pose a material threat of a future release to the environment. A potential REC was reported based on a concrete cut that was suspected of being part of a former in-ground hydraulic lift due to a risk of PCB contamination (see "Subsurface Investigation" below for testing results). A *de minimis* condition was reported due to visible staining on the parking areas. Suspected mold was observed in the water heater closets of the 203 Commodore Webster Drive building, Unit 203A, which Tetra Tech recommends be cleaned and repaired. Pesticides and other chemicals were also observed stored within storage areas and chemical cabinets. However, these were determined to be stored properly and not considered an environmental risk.
- **Subsurface Investigation**: Soil and groundwater sampling was conducted within the area identified as a potential REC and elevated metals were discovered in the groundwater during the first assessment, which triggered a follow-up investigation. The follow-up investigation determined that the original sample was from a perched water source due to groundwater likely being 40 to 60 feet below ground surface and no groundwater being encountered during the follow-up

investigation. Tetra Tech determined that the elevated metals in the original sampling event was not a major concern and therefore no longer considered a REC.

- **Asbestos-Containing Materials Survey** – For buildings constructed prior to 1981, federal regulations state that thermal system insulation (boiler insulation, pipe lagging, and related materials) and surface materials (e.g., acoustical ceilings) must be designated as an *asbestos-containing material* (ACM) unless proven otherwise through sampling in accordance with the standards of the Asbestos Hazard Emergency Response Act. Non-destructive testing conducted at the site revealed the presence of asbestos in 10 of the 15 buildings. These materials are black sink undercoating, black mastic, yellow mastic, white sheet flooring, green sheet flooring, off-white floor tile, and white acoustical ceiling texture. Due to the presence of asbestos-containing materials, a certified abatement company was recommended to remove these materials prior or during construction.
- **Lead-based paint inspection**: The survey discovered the presence of lead-based paint in three locations. The living room closet door and second floor hall storage closet of Unit 201C and the living room closet door frame in 205A were found to contain lead paint greater than 1.0 mg/cm^2. Due to the presence of lead-based paint, the painted materials should be removed in accordance with local, State, and federal regulations.
- **Lead in soil sampling**: In 1978, the federal government banned the use of *lead-based paint* (LBP) in commercial applications; however, usage was allowed to continue in many industrial settings. A soil sample from a single location, outside of Building 103, measured 200 mg/kg of lead, which exceeds the California EPA limit of lead in soil of 80 mg/kg (CalEPA 2015). Further sampling was performed at this location, and no elevated samples were found. It was determined that this sampling is considered localized and not a major concern to the site. However, it is recommended that soil disturbed in this area should be removed and disposed of in accordance with local, state, and federal regulations.

Site Conditions

Historical Aerial Photography Review

Review of historical aerial photographs indicates that the project site was undeveloped from 1952 to 1971. From 1974 to 2016, the site was developed with residential and other supporting structures. The surrounding properties to the northeast and southeast remained essentially undeveloped from 1952 to 2016. The surrounding properties to the northwest and southwest evolved from sparsely populated with residential and some commercial structures in 1952 to significant residential and commercial development in 2016 (Essel Environmental Engineering & Consulting 2021).

Underground/Aboveground Storage Tanks

Each building has at least one *aboveground storage tank* (AST) that contains propane. Several partially buried *underground storage tanks* (USTs) are located along the south side of Commodore

Webster Drive near the site entrance. None of the regulatory database listings or other regulatory agency records searched during the 2021 Phase I ESA contained records pertaining to either USTs or ASTs at the site (Essel Environmental Engineering & Consulting 2021).

Petroleum Products and Hazardous Materials and Wastes
A chemical storage cabinet used by the Marin County Fire Department was observed at the project site located behind the maintenance building. Several plastic gasoline and diesel containers were observed inside of the cabinet. Also located behind the maintenance building were two secondary containments containing used oil, also used by the Marin County Fire Department.

On-site Wells
Two monitoring wells are located on the northeast portion of the project site. Additionally, four monitoring wells are mapped on the southwesterly adjacent property. No water-supply wells are located within 0.25 mile of the project site. There are no records of oil, gas, or geothermal resources wells at or in the vicinity of the project site (Essel Environmental Engineering & Consulting 2021).

Discussion

a) Would the Project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Construction
No hazardous substances as defined by the Hazardous Materials Transportation Uniform Safety Act would be used, transported, or disposed of as a part of the project. Construction of the proposed project would involve the use of materials that are defined as hazardous, such as paints and other types of coatings, fuels, hydraulic fluids, and coolants for construction equipment. All of these materials are common in the construction industry and construction process, and specifications outlined by their respective manufactures for their transport, handling, use, and disposal are designed to ensure avoidance of adverse environmental effects.

Hazardous fluids have the potential to leak from construction vehicles and equipment. The project requires preparation of a Stormwater Pollution Prevention Plan (SWPPP) due to disturbance of more than 1 acre of land. The SWPPP includes procedures for cleanup of any spilled hazardous materials. The impact from spills of hazardous materials during construction would therefore be less than significant.

Operation/Occupancy
Once construction is completed, small quantities of hazardous materials (e.g., paints, solvents, oils) could be stored and used at the residential properties as is common in residential uses. The project would also include an 80 kW BESS and backup diesel generator located between Buildings 1 and 50. The proposed microgrid would provide power to Building 1 and the wastewater treatment plant. Small quantities of diesel would be stored on site for the backup generator. Due to the small number of residential parcels and limited quantities of hazardous

materials that are associated with residential uses, the potential for an accidental release of hazardous materials from the residential development is considered low. Furthermore, the risk of upset and accident conditions involving the release of hazardous materials into the environment would be reduced through compliance with the federal and State requirements. The project would be carried out in accordance with federal, State, and County regulations for transport, storage, and disposal of hazardous materials. Impacts from hazardous materials during construction and operation would be less than significant.

b) Would the Project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

The previously prepared Phase I ESA determined the presence of lead-based paint and ACM on site. The survey revealed the presence of lead-based paint in three locations on site. The living room closet door and second floor hall storage closet of Unit 201C and the living room closet door frame in 205A were found to contain lead paint greater than 1.0 mg/cm^2. Non-destructive testing conducted at the project site discovered the presence of asbestos in 10 of the 15 buildings. These materials are black sink undercoating, black mastic, yellow mastic, white sheet flooring, green sheet flooring, off-white floor tile, and white acoustical ceiling texture (Tetra Tech 2016). Release of lead-based paint or ACM during demolition and construction would be a significant impact.

Mitigation Measures Haz-1 outlines the procedures to be implemented to properly test and dispose of potential lead-based paint and ACM during demolition and construction. The construction materials and demolition materials would be properly transported and disposed of per federal and State regulations. After construction, there would be no hazardous materials transported to or from the site on a regular basis; therefore, the proposed project would not involve the routine transport use or disposal of hazardous material. Because demolition materials would be properly contained in compliance with Mitigation Measure Haz-1 and the proposed project would not involve routine transport, use, or disposal of hazardous materials during operation, the impact would be less than significant with mitigation.

c) Would the Project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Construction

The West Marin Elementary School is located approximately 0.25 mile north of the proposed project site. As noted in impact discussion a), construction of the proposed project would involve the use of materials that are defined as hazardous, such as paints and other types of coatings, fuels, hydraulic fluids, and coolants for construction equipment. However, all of these materials are common in the construction industry and construction process, and specifications outlined by their respective manufactures for their transport, handling, use, and disposal are designed to ensure avoidance of adverse environmental effects. Proper handling of the standard

hazardous materials during construction would ensure that hazardous materials would not be transported to the school. In addition, the school is located at a higher elevation than the project site, so there is a low potential for exposure to construction emissions or hazardous materials.

Operation/Occupancy
After construction, there would be no hazardous materials transported to or from the site on a regular basis besides small quantities of hazardous materials (e.g., paints, solvents, oils) that could be stored and used at the residential properties. The project would also include an 80 kW BESS and backup diesel generator located between Buildings 1 and 50. Small quantities of diesel would be stored on site for the backup generator. Due to the small number of residential parcels and limited quantities of hazardous materials that are associated with residential uses, the potential for an accidental release of hazardous materials from the residential development is considered low.

The project would rehabilitate the existing townhomes, dormitory building, and administrative building for affordable housing. Residential use is not a land use that is associated with the production or emission of hazardous materials, such as industrial and manufacturing uses. Therefore, the project would not emit hazardous emissions or handle hazardous or acutely hazardous materials. Impacts would be less than significant.

d) Would the Project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

California Government Code section 65962.5, also known as the Cortese List, requires the CalEPA to develop an updated list of hazardous material sites. The California Department of Toxic Substances Control (DTSC) is responsible for a portion of the information contained in the Cortese List. There are no known hazardous materials sites located within the project area; however, there are six hazardous material sites within 0.5 mile from the project area (California State Water Resources Control Board 2023) (SWRCB n.d., tit. GeoTracker). Table 3.2-10, below provides the location, type, and status of the seven known hazardous materials sites.

Table 3.2-10 Hazardous Materials Sites within 0.5 Mile of Project Site

Case Name	Address	Type	Status
Ann Dick Jewelry	1525 Mesa Road, Point Reyes Station	Cleanup Program Site	Completed – Case Closed
Caltrans Point Reyes Maintenance Yard	10795 HWY 1, Point Reyes Station	LUST Cleanup Site	Completed – Case Closed
Cheda Chevrolet	11225 State Route 1, Point Reyes Station	LUST Cleanup Site	Completed – Case Closed
Chevron/Redwood Oil Bulk Plant	11095 State Route 1, Point Reyes Station	Cleanup Program Site	Completed – Case Closed

Case Name	Address	Type	Status
Greenbridge Gas & Auto	11401 State Route 1, Point Reyes Station	LUST Cleanup Site	Completed – Case Closed
Pacific Bell	Lighthouse RD, Point Reyes Station	LUST Cleanup Site	Completed – Case Closed
Toby's Trucking Inc.	B St, Point Reyes Station	LUST Cleanup Site	Completed – Case Closed

Source: (SWRCB n.d., tit. GeoTracker)

As shown in Table 3.2-10, all the sites within 0.5 mile of the project site have been remediated and closed. The sites no longer pose a risk to the surrounding properties, including the proposed project site. Therefore, no impacts would occur.

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

The proposed project is not located within an airport land use plan or within 2 miles of a public airport or public use airport. The closest airport is the Marin County Airport, approximately 14 miles east of the project site. No impact from conflict with an airport land use plan would occur.

f) Would the Project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Construction

The County of Marin provides wildfire evacuation zone maps for wildland-urban interface areas in the County. During a disaster or other emergency, the emergency response would be led by the Marin County Sheriff's OES in accordance with the Marin OA EOP. The response measures may vary depending on the nature and location of the event but could involve evacuation of the populated areas and movement of emergency vehicles along roadways within this area. In the Point Reyes area, Point Reyes–Petaluma Road is identified as a primary evacuation route (County of Marin 2017). Point Reyes–Petaluma Road is located northeast of the project site; however, Commodore Webster Drive does not directly connect to Point Reyes–Petaluma Road.

The project site is located at the end of Commodore Webster Drive, and no other users access this portion of the road other than possibly turning around at the cul-de-sac. The project site is bounded by the Point Reyes Affordable Homes to the west, an undeveloped lot to the north, and Lagunitas Creek to the east and south. Access to the project site would be provided by Mesa Road, immediately east of the intersection of Mesa Road and SR-1.

Construction workers and delivery trucks would access the site via the existing surrounding roads. Project staging and storage areas would be located within the project site. Construction of the project does not require closure of Commodore Webster Drive or any of the surrounding roadways. Access would always be granted to emergency responders, and construction would be halted in the event of an emergency to allow safe access. Construction or operation/occupancy would not affect residents at Point Reyes Affordable Homes as the proposed project is located at the end of road and would not impede or restrict access in the event of an emergency.

Operation/Occupancy

The project would consist of 54 affordable housing units within the 12 existing buildings, which equates to approximately 215 residents. Project operation would not interfere with emergency response because driveways and access points would comply with all County fire safety standards to maximize entry and egress space for emergency vehicles. In the event of an emergency, evacuation from the project site would be provided by Mesa Road, immediately east of the intersection of Mesa Road and State Highway 1. Occupancy of the low-density residential parcels would not block or impede access to primary evacuation route, Point Reyes–Petaluma Road. Impacts would be less than significant.

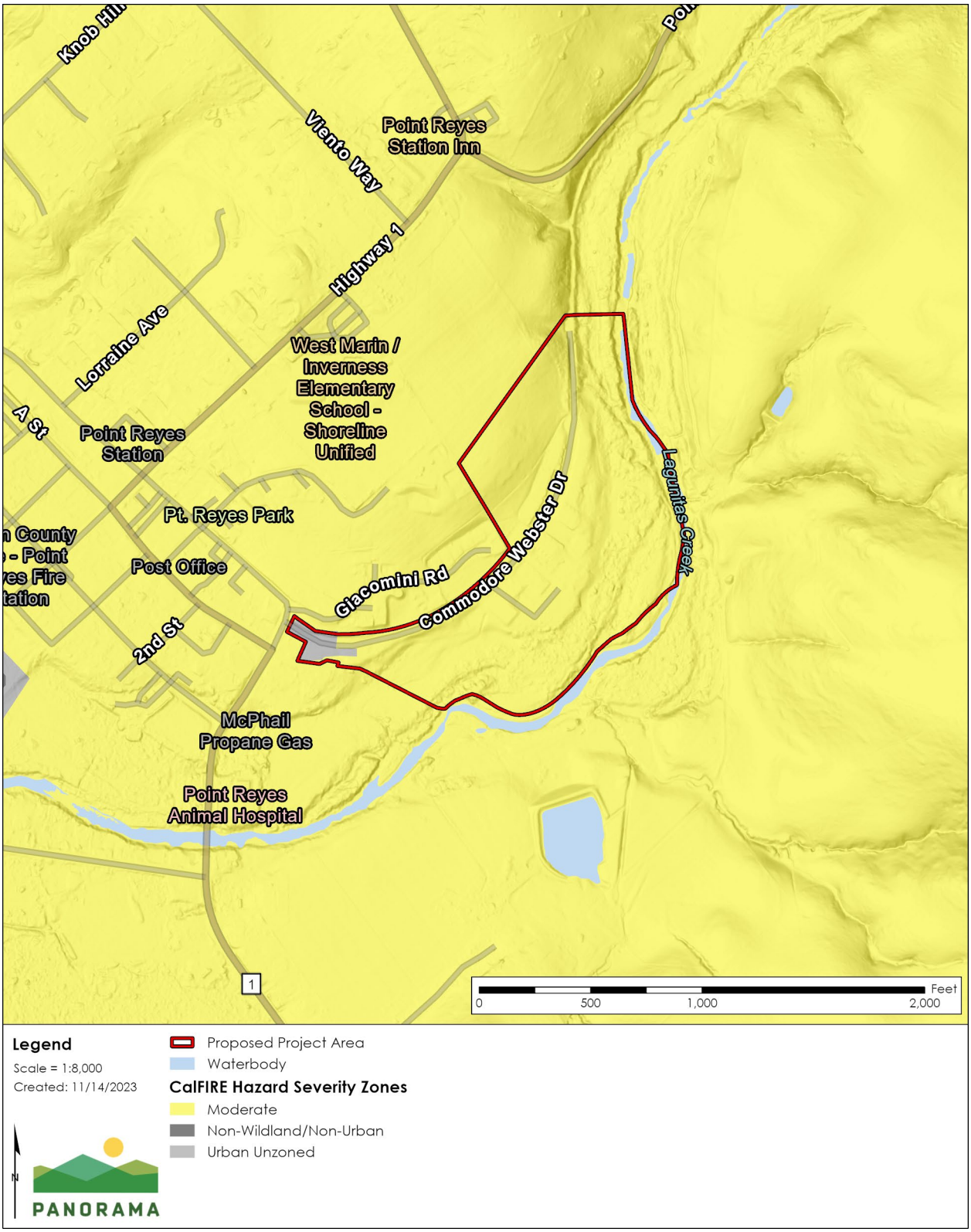
g) Would the Project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

State Responsibility Areas (SRA) are recognized by the Board of Forestry and Fire Protection as areas where Cal Fire is the primary emergency response agency responsible for fire suppression and prevention. The SRA designates fire risk zones as very high, high, or moderate. The proposed project is located within a moderate fire hazard severity zone, as shown in Figure 3.2-3.

Construction

The majority of the project site is currently developed and contains fire hydrants and defensible space. Construction within developed portions of the site would not result in increased wildfire risk. However, portions of the project site where the solar facility and wastewater treatment system would be installed and new landscape self-retaining areas would be in undeveloped lands containing grasslands and adjacent riparian forest. Construction equipment use in undeveloped areas could create sparks and ignite a fire. Other potential fire hazards could include worker behavior such as smoking and disposal of cigarettes as well as parking or driving vehicles and equipment on dry vegetation. Ignition of a wildfire would cause a significant wildfire risk and be a significant impact. The Office of the State Fire Marshal and California Department of Forestry and Fire Protection (CAL FIRE) administer State policies regarding wildland fire safety. Construction contractors must comply with the following requirements in the PRC during construction activities at any sites with forest-, brush-, or grass covered land:

Figure 3.2-3 Fire Hazard Severity Zone



Source: (California Department of Forestry and Fire Protection, FRAP 2023; USGS 2012; ESRI 2011)

- Earthmoving and portable equipment with internal combustion engines must be equipped with a spark arrestor to reduce the potential for igniting a wildland fire (PRC Section 4442).
- Appropriate fire-suppression equipment must be maintained from April 1 to December 1, the highest-danger period for fires (PRC 4428).
- On days when a burning permit is required, flammable materials must be removed to a distance of 10 feet from any equipment that could produce a spark, fire, or flame, and the construction contractor must maintain the appropriate fire-suppression equipment (PRC Section 4427).
- On days when a burning permit is required, portable tools powered by gasoline fueled

The impact of construction in the grassland, brush, or forested portions of the site would be less than significant due to compliance with the requirements of PRC, which restricts construction in wildfire prone areas.

Operation/Occupancy

Emergency access to the site would be provided by Commodore Webster Drive. Driveways and access points would comply with all County fire safety standards to maximize entry and egress space for emergency vehicles. The project structures are primarily existing structures, and all upgrades/improvements would be designed to meet State and County building codes, including 2022 California Fire Code (CFC), Title 24, Part 9. The CFC contains regulations consistent with nationally recognized and accepted practices for safeguarding life and property from the hazards of fire and explosion; dangerous conditions arising from the storage, handling, and use of hazardous materials and devices; and hazardous conditions in the use or occupancy of buildings or premises. The CFC also contains provisions to assist emergency response personnel. Consistent with CFC requirements, fire sprinklers would be added to the ADA compliance mobility units in Buildings 202 and 204, Building 50, and Building 1. New fire water lines would be installed to service the sprinkler system. No new fire hydrants are proposed. All landscaping would comply with required defensible space by Marin County Fire Department. The project would also comply with defensible space requirements in Zone 1 of the ESHA. Specifically, the overlapping zone would be managed by a professional ecological restoration maintenance crew who would perform vegetation removal limited to tree branch lopping, shrub pruning, and mowing of grasses and forbs outside of the nesting bird season (Feb 1–Aug 15), to reduce the fuel load while maintaining habitat and shade within these overlapping zones. With compliance with State and County requirements, the proposed project would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires. Impacts would be less than significant.

Mitigation Measures

Mitigation Measure Haz-1: Asbestos and Lead-Based Paint

Demolition activities shall comply with the OSHA Standard 1926.6 related to lead abatement, and all other applicable State and federal requirements for the safe handling and disposal of

lead-based paint, ACM, and universal wastes. The project contractor shall implement the following measures.

Lead-based Paint

As lead was identified in the paints and a detailed inventory of paints was not performed for the entire project, for the purpose of complying with the Cal/OSHA lead in construction regulation (8 CCR 1532.1), all coated surfaces shall be considered to contain some lead and require demolition dust control procedures and presumed respiratory protection usage for compliance with Cal/OSHA's Construction Lead Standard under 8 CCR 1532.1. The aforementioned regulation contains requirements for lead air monitoring, work practices, respiratory protection, etc., that are triggered by the presence of any detected levels of lead.

None of the applicable regulations require removal of lead paint prior to demolition if the paints are securely adhered to the substrates (i.e., non-flaking or non-peeling). Disposal of the demolition debris in this case can be handled as non-hazardous and non-RCRA waste after the loose and flaking paint have been removed as long as demolition practices do not compromise worker safety and waste stream characterization testing has been performed by the Contractor on the entire waste stream for verification.

Conventional demolition techniques shall be employed for all painted surfaces, with the Contractor complying with applicable OSHA and Cal/OSHA statutes regarding the following:

- Worker awareness training
- Exposure monitoring, as needed
- Medical examinations, which may include blood lead level testing
- Establishing a written respiratory protection program

Asbestos-containing Materials (ACM)

Any suspect material not sampled or not visually identified as negative by the Environmental Compliance Due Diligence Activities Report prepared by Tetra Tech in 2016 shall be assumed to contain asbestos and require destructive testing prior to demolition. Inspections in California are required to be conducted by a Certified Asbestos Consultant (CAC) or by a Certified Site Surveillance Technician (CSST) working under a CAC. In the absence of testing, the materials shall be assumed to contain asbestos and disposed of in accordance with OSHA Standard 1926.6.

3.2.10 Hydrology and Water Quality

Environmental Impacts	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
10. HYDROLOGY AND WATER QUALITY. Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	☐	☐	☒	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☒	☐	☐
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:	☐	☐	☒	☐
i) result in substantial erosion or siltation on- or off-site;	☐	☐	☒	☐
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	☐	☐	☒	☐
iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	☒	☐
iv) impede or redirect flood flows?	☐	☐	☒	☐
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☒	☐
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

Environmental Setting

Site Drainage

The project site is located within the Lagunitas Creek watershed. Lagunitas Creek flows from east to west across the southern portion of the project site and discharges to Tomales Bay, located approximately 2 miles northwest of the project site. The existing site includes 11 low-rise residential buildings and six non-residential structures as well as parking and paving areas. The project site slopes gradually towards Lagunitas Creek, which is the primary drainage feature in the project area.

The existing development on the project site includes stormwater inlets, which convey stormwater from the site directly to outfalls into the riparian areas adjacent to Lagunitas Creek. There is currently no treatment of the site runoff prior to the stormwater outfall.

Groundwater Supplies
No groundwater basin is defined underlying the project area(California Department of Water Resources 2015); therefore, no groundwater sustainability agency or groundwater sustainability plan has been adopted for the area. The project site contains two existing potable water wells, both of which were installed by the USCG and are maintained by NMWD. Analysis of groundwater elevations and percolation rates on the site are provided in Appendix F.

Flood Hazard Zone
As discussed in Section 2.2.5, the existing and proposed habitable structures are located outside of the mapped floodway as amended by FEMA on May 5, 2023, in the Letter of Map Amendment (Appendix A). The FEMA 100-year floodplain covers a portion of the existing development area, as shown in Figure 2.3-1.

Tsunami Inundation
Lagunitas Creek and portion of the adjacent riparian corridor are located within a tsunami inundation area. The existing residential development and proposed structures are not located within a tsunami inundation area (CalOES 2022).

Water Quality Control Plan
The San Francisco Regional Water Quality Control Board adopted the San Francisco Basin Water Quality Control Plan (Basin Plan) in 2010. The Basin Plan lists beneficial uses for water bodies. The Basin Plan includes the following beneficial uses for Lagunitas Creek:

- Agricultural supply: Uses of water for farming, horticulture, or ranching, including, but not limited to, irrigation, stock watering, or support of vegetation for range grazing
- Municipal and domestic Supply[2]: Uses of water for community, military, or individual water supply systems, including, but not limited to, drinking water supply
- Freshwater Replenishment[2]: Uses of water for natural or artificial maintenance of surface water quantity or quality

[2] MUN, FRSH, & RARE: Lagunitas Creek begins on Mt. Tam, and the creek and its tributaries feed into MMWD's reservoirs. Downstream of the reservoirs, the creek is a spawning and rearing ground for coho salmon and steelhead trout. The creek is also habitat for endangered California freshwater shrimp. Lagunitas Creek supports one of the best populations of coho salmon, and probably the best population of freshwater shrimp, in the state.

- Cold freshwater habitat: Uses of water that support cold water ecosystems, including, but not limited to, preservation or enhancement of aquatic habitats, vegetation, fish, or wildlife, including invertebrates
- Fish migration: Uses of water that support habitats necessary for migration, acclimatization between fresh water and salt water, and protection of aquatic organisms that are temporary inhabitants of waters within the region
- Preservation of rare and Endangered Species[2]: Uses of water that support habitats necessary for the survival and successful maintenance of plant or animal species established under state and/or federal law as rare, threatened, or endangered
- Fish spawning: Uses of water that support high quality aquatic habitats suitable for reproduction and early development of fish
- Warm freshwater habitat: Uses of water that support warm water ecosystems including, but not limited to, preservation or enhancement of aquatic habitats, vegetation, fish, or wildlife, including invertebrates.
- Wildlife habitat: Uses of waters that support wildlife habitats, including, but not limited to, the preservation and enhancement of vegetation and prey species used by wildlife, such as waterfowl.
- Water contact recreation: Uses of water for recreational activities involving body contact with water where ingestion of water is reasonably possible. These uses include, but are not limited to, swimming, wading, water-skiing, skin and scuba diving, surfing, whitewater activities, fishing, and uses of natural hot springs.
- Noncontact water recreation: Uses of water for recreational activities involving proximity to water but not normally involving contact with water where water ingestion is reasonably possible. These uses include, but are not limited to, picnicking, sunbathing, hiking, beachcombing, camping, boating, tide pool and marine life study, hunting, sightseeing, or aesthetic enjoyment in conjunction with the above activities.

The Tomales Bay Watershed, including Lagunitas Creek, is currently listed as impaired for its beneficial uses due to excess nutrients from animal and human waste (SWRCB 2010). A *total maximum daily load* (TMDL) for sediment was adopted for Lagunitas Creek in 2014 ("Item 5" 2014). The fine sediment TMDL was adopted to restore annual spawning for coho salmon within Lagunitas Creek. The TMDL includes specific quantities of sediment for areas upstream of Olema Creek (including the project area) that are allocated to each sediment source activity including landslides, gullies, and soil creep; roads; tributary channels; and channel incision and bank erosion.

Discussion

a) Would the Project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?

Construction

Construction of the proposed project would involve ground disturbance for removal of existing non-residential structures, construction of new bioretention areas, removal of trees, installation

of solar panels and electrical conduit, and installation of a new wastewater treatment system and leach field. Construction would also require use of heavy equipment containing fuel, hydraulic fluid, and lubricants. Other materials that would be used during construction include paints and solvents, which if spilled could degrade water quality. The temporary ground disturbance from excavation and grading during construction and potential fills or leaks of fuels, paints, solvents, or other materials could degrade surface water quality. Construction would not be taking place in or immediately adjacent Lagunitas Creek, and a 50-foot riparian ESHA buffer would be implemented to protect sensitive riparian habitat.

The project construction would be implemented in compliance with the SWPPP (Appendix G). In addition, the project would need to comply with the Construction Stormwater General Permit (Order No. 2022-057-DWQ) (SWRCB 2022). In compliance with the Construction Stormwater General Permit, a SWPPP would be implemented as part of the project and would include specific BMPs and design and conservation measures that would be used to control construction area erosion and transport of sediment to Lagunitas Creek. The measures include erosion control BMPs (e.g., silt fences, straw wattles, seed-free mulching) and revegetation with native plants as well as source-control BMPs to address potential leaks or spills of hazardous materials and avoid transport of any hazardous materials (e.g., fuels, lubricants, hydraulic fluid, paints, solvents) to Lagunitas Creek. Compliance with the Construction Stormwater General Permit and SWPPP would ensure that impacts to water quality are less than significant, and no mitigation would be required.

Operation/Occupancy

The project design includes removal of existing structures and impervious surfaces in proximity to riparian areas and Lagunitas Creek and replacement of those structures with bioretention areas to improve water quality. Because the project would add new bioretention features, which could reduce discharge of sediment or other water quality pollutants to Lagunitas Creek, the potential impact to Lagunitas Creek from sediment loads generated at the project site would be potentially beneficial and less than significant.

The project would also include installation of a new, enhanced wastewater treatment system to produce high-quality effluent that can be reused for landscape irrigation around the site. The associated leach fields would be used as a backup disposal system during periods of rainfall or when the irrigation system is being maintained. As a precautionary measure, the treatment and disposal systems would be sized up by a factor of safety of 1.1 to manage increased flows during special events with increased usage.

The wastewater treatment system would be designed to meet the State's Recycled Water Standards, established in California Code of Regulations Title 22, for disinfected tertiary treatment. The proposed treatment train is designed to provide a very high level of treatment to protect groundwater resources at the site, to allow for reuse of the water, and ensure reliable effluent quality as illustrated in the BOD report (Appendix H). The treatment system would be designed to produce disinfected tertiary treated recycled water that would have a biochemical oxygen demand, total suspended solids, and total nitrogen level to less than 10 mg/L. The

recycled water must also meet effluent limits set by the State Water Resources Control Board Order WQ 2014-0153-DWQ "General Waste Discharge Requirements for Small Domestic Wastewater Treatment Systems" (2014 WDR General Order). The treatment goals for the proposed system are included in Table 3.2-11, below. The treatment system has been designed to meet the treatment goals and would produce higher quality water than is required under the 2014 WDR General Order.

Table 3.2-11 Wastewater Treatment Standards

Parameter	Unit	Treatment goal
Biochemical oxygen demand	mg/L	10
Total suspended solids	mg/L	10
Total nitrate	mg/L	10
Bacteria	-	5-log removal (99.999%)
Cysts (giardia/cryptosporidium)	-	5-log removal (99.999%)
Viruses	-	5-log removal (99.999%)

Source: (Sherwood Design Engineers 2022)

The tertiary treated recycled water would be applied to either a leach field or to landscape areas within the project site. The recycled water would be applied to leach field during the rainy season when vegetation water demand is less than the recycled water volume and would be applied to the landscape area via subsurface drip dispersal when landscape water demand exceed the volume of recycled water being applied. In the summer, it is assumed that up to 100 percent of recycled water supply would be used for irrigation, and potable water may be needed to supplement the recycled water depending on the final landscape plan and plants selected. Because the recycled water would be applied to landscaping subsurface and at a rate that it would be used by the landscaping, the wastewater applied to the landscaping would not migrate to the creek and would not degrade water quality in Lagunitas Creek, nor would the drip irrigation affect the groundwater quality.

During periods when the irrigation water demand does not exceed rainfall, the wastewater would be applied within the leach field as the primary means of water disposal. The leach field is sized to accommodate 100 percent of the design flow of the wastewater system. The leach field would be used during periods of low irrigation demand, during rain events, and when the subsurface drip system needs maintenance. All subsurface drip dispersal areas and leach fields must comply with local regulations, which require a 110-foot setback from flowing streams, a 50-foot setback from ephemeral stream drainages, and a 75-foot setback from intermittent watercourses or seasonal wetlands. The leach field is located approximately 400 feet from Lagunitas Creek at the nearest point. Leach fields would include trenches measuring 24 inches

deep by 24 inches wide. Leach field saturation or ponding is unlikely, given the high quality of recycled water, which would minimize biological growth and potential clogging in the leach trench. Because wastewater would be discharged subsurface, and because the leach field is separated from Lagunitas Creek by 400 feet, discharge waters in the leach field would infiltrate to the groundwater and would not migrate to the creek surface waters or degrade the surface water quality of Lagunitas Creek. Because of the high quality of recycled water that would be discharged in the leach field, discharge to the leach field would also not substantially degrade groundwater quality because of the high level of treatment prior to discharge.

b) Would the Project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin?

Construction

Construction of the project would require temporary water for worker uses as well as for dust control in areas of grading and land disturbance. Construction would last a total of 12 months and would employ approximately 30 workers on average. Grading would be conducted for approximately 3 months and would be limited to areas of new bioretention basins, the solar facility, and the wastewater treatment facilities. Most of the construction would occur within existing developed areas and would not require water for dust control. Due to the short duration of construction and limited area of disturbance requiring dust control, the amount of water required for construction would not substantially decrease groundwater supplies. The impact of construction would be less than significant.

Operation

Groundwater Supplies

NMWD has two active water supply wells located on the project site. The wells provide the primary source of water supply for a service area of more than 20 square miles in the Point Reyes area, with annual water production of more than 100 million gallons. The wells are completed in the alluvium above the bedrock and draw water mainly from highly permeable sand and gravel deposits that are recharged largely by the stream flow and underflow of Lagunitas Creek and, to a lesser extent, by lateral inflow from the adjacent hills. The wells are approximately 60 feet deep, with a 20-foot annular seal and a 40-foot screened section.

The housing units would have a water demand of 9,500 gpd supplied to the housing from NMWD. The housing units were previously supplied water from the groundwater wells on the project site, and the connection of the 54 housing units to the NMWD service system would not cause a significant impact on groundwater supplies due to the limited volume of water required for the project.

The project would include installation of a new, enhanced wastewater treatment system to produce high-quality effluent that can be reused for landscape irrigation around the site. The associated leach fields would be used as a backup disposal system during periods of rainfall or when the irrigation system is being maintained. As discussed in impact discussion a) above, the

wastewater treatment system would be designed to meet the State's Water Recycling Criteria, established in California Code of Regulations Title 22, for disinfected tertiary treatment and the water quality objectives in Table 3.2-11, which include very low levels of any pollutants, including bacteria and viruses.

Drinking water source Protection Zones are applied to groundwater resources to manage potential risks of contamination. Drinking water supplies are categorized as Zone A, to protect the drinking water supply from viral, microbial, and direct chemical contamination (Questa Engineering Corp 2023). Zone A is defined by the surface area overlying the portion of the aquifer that contributes water to the drinking water well(s) within a 2-year time-of-travel. The 2-year time-of-travel criterion is used because research indicates that bacteria and viruses survive less than two years in soil and ground water (EPA 2023b). The project proposes application of treated wastewater approximately 1.5 feet subsurface, to be used as landscaping irrigation during periods when the application of water would be less than the agronomic rate of the landscaping. Application of recycled water at agronomic rates allows plants to take up wastewater constituents and minimizes the movement of nutrients below the root zone (State Water Resources Control Board 2016).

The treated wastewater would be applied to the leach field during periods when water cannot be applied for landscaping (e.g., during the rainy season). The landscaping area is within the Protection Zone for the NMWD wells. The leach field is generally located outside the Protection Zone; however a small portion of the leach field is within the Protection Zone from NMWD wells (Questa Engineering Corp 2023). Application of the tertiary treated recycled water has the potential to affect the NMWD groundwater supply wells if the tertiary treated recycled water were to result in increased levels of contaminants or otherwise affect the drinking water quality such that the groundwater quality no longer met water quality standards for drinking water. If NMWD could no longer use their groundwater supply wells due to impacts on groundwater quality from application of the tertiary treated groundwater, the impact on water supply would be significant.

Mitigation Measure HYDRO-1 defines procedures for determining when water can be applied to landscaping based on depth to groundwater and forecast rain events to avoid applying treated wastewater when groundwater elevations are higher. The mitigation measure also requires groundwater monitoring in between the leach field and irrigation areas and the NMWD water supply wells and defines action levels at the intervening water supply wells at which application of the tertiary treated water would either cease or be reduced. The measure also defines alternative disposal options for the treated wastewater if the application of treated wastewater exceeds the thresholds defined to protect the NMWD water supply wells. With application of Mitigation Measure HYDRO-1, the project would not adversely affect the water quality of NMWD water supply wells, and the impact on groundwater supplies would be less than significant.

Groundwater Recharge

The project involves renovation of existing structures to provide affordable housing. All roads, parking areas, and buildings that would be used during operation are existing facilities. The project would remove existing structures in order to construct new bioretention areas. The new bioretention areas would increase groundwater recharge and infiltration. Because the project would not create any new roads, parking areas, or buildings and would create new recharge areas, the project would not interfere substantially with groundwater recharge, and the impact on groundwater recharge would be less than significant.

c) Would the Project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

- **i. Result in substantial erosion or siltation on- or off-site;**
- **ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;**
- **iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or**
- **iv. Impede or redirect flows?**

Construction

The project would not substantially alter the existing drainage pattern of the site through alteration of the course of a stream or river. No construction is proposed within Lagunitas Creek, and the project would not directly alter any streams or rivers in the area. The drainage patterns on the site would remain, and all project areas would continue to drain towards Lagunitas Creek. Some grading would be required on the site to intercept the stormwater runoff and direct it to bioretention areas before the water reaches Lagunitas Creek. While the stormwater runoff would be redirected to the bioretention areas, the bioretention areas would not increase erosion or siltation on or off site as the purpose of the bioretention features is to reduce siltation. Construction of the project would mostly be conducted within existing developed areas, including existing structures and parking areas. The only areas of new impervious surfaces would include the minimal infrastructure at the wastewater treatment facility and the infrastructure for the solar facility. Construction would overall result in a net reduction in impervious surfaces on the site as the existing structures/impervious surfaces near the riparian corridor would be removed and replaced with bioretention facilities and landscape areas. In addition, as discussed in impact discussion a) above, the project would be implemented in compliance with the Construction Stormwater General Permit, which includes implementation of erosion control BMPs to reduce the risk of erosion or siltation. The impact of construction on alteration of drainage patterns, and addition of impervious surfaces would be less than significant.

Operation/Occupancy

Following construction, storm drain outlet pipes would be intercepted and routed to six new bioretention facilities throughout the project site to provide treatment of existing and proposed

impervious surfaces. In addition, as discussed above, the project would remove impervious surfaces in areas adjacent the riparian corridor and would replace the impervious surfaces with bioretention and landscaping areas. The proposed bioretention facilities and self-retaining areas would not only treat runoff from the new impervious areas but would enhance stormwater infiltration and water quality, thus improving water quality of runoff entering Lagunitas Creek. In addition, the existing mulched playground would be converted into a self-retaining area that would accept runoff from the uphill site to allow for infiltration into the ground. The project would result in reduced impervious surface area and increased bioretention self-retaining areas during operation and would therefore be expected to result in reduced sediment loading and provide increased treatment of runoff to Lagunitas Creek. The project impact would be less than significant, and no mitigation is required.

d) Would the Project, in flood hazard, tsunami, or seiche zones, risk release of pollutants due to Project inundation?

Construction

Construction of the project would involve demolition of existing structures and grading/construction of new bioretention areas within the 100-year floodplain. Heavy equipment may also be stored within parking areas that are within the 100-year floodplain. Minor grading to construct the bioretention areas and storage of construction equipment have the potential to release pollutants if the project area were flooded and inundated during the construction period. While the risk of flooding is very low during the 12-month construction period, the construction activities would create an impact if flooded. The Construction Stormwater General Permit requires BMPs to be implemented prior to rain events to avoid the risk of sediment mobilization in rain events or flooding. Mitigation Measure HYDRO-2 requires staging and storage of construction equipment and equipment refueling outside of the 100-year floodplain. Because equipment would be stored outside of the 100-year floodplain, the impact from release of pollutants due to flooding would be less than significant.

Operation

The project would rehabilitate existing residential structures, some of which are located within the FEMA floodplain. The project would not construct any new structures within the FEMA floodplain. The proposed wastewater treatment system would be located outside of the FEMA floodplain and would not result in a risk of pollutants in the event of flooding inundation. No proposed structures are located within a tsunami or seiche inundation area. While the project would introduce new inhabitants to the project area after construction, the reoccupation of the site would not create a new risk of pollutants as all waste would be properly stored in covered bins and there would be improved stormwater management and treatment with the improved stormwater bioretention systems that would be installed as part of the project. With implementation of the proposed stormwater improvements, the project could have a lower risk of release of sediment and pollutants in the event of inundation due to improved stormwater management.

e) Would the Project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Water Quality Control Plan

The proposed project is also managed by the San Francisco Bay Basin Water Quality Control Plan (2010), which outlines water quality objectives as well as water quality attainment strategies and TMDLs. The project area is adjacent Lagunitas Creek, which has an adopted TMDL for sediment. TMDL includes specific quantities of sediment for landslides, gullies, and soil creep; roads; tributary channels; and channel incision and bank erosion. The project is not a source of sediment that is addressed in the TMDL and would therefore not conflict with the TMDL.

During construction, the project has the potential to generate sediment in runoff. All contractors would follow the project's SWPPP, which requires compliance with Provision E.12 of the statewide Phase II municipal stormwater NPDES permit reissued by the California State Water Resources Control Board in 2013. In addition, the project would need to comply with the Construction Stormwater General Permit (Order No. 2022-057-DWQ) (SWRCB 2022). In compliance with the Construction Stormwater General Permit, a SWPPP would be implemented as part of the project and would include specific BMPs and design and conservation measures that would be used to control construction area erosion and transport of sediment to Lagunitas Creek. The measures include erosion control BMPs (e.g., silt fences, straw wattles, seed-free mulching) and revegetation with native plants as well as source control BMPs to address potential leaks or spills of hazardous materials and avoid transport of any hazardous materials (e.g., fuels, lubricants, hydraulic fluid, paints, solvents) to Lagunitas Creek. The project would also install new bioretention areas to capture and treat stormwater runoff from the site, which would improve the quality of runoff water from the site compared to existing conditions. Because the project would comply with the Construction Stormwater General Permit, including implementation of a SWPPP during construction, the project would not conflict with or obstruct implementation of a water quality control plan.

Sustainable Groundwater Management Plan

The project area does not overlie a groundwater basin defined by the State of California. No groundwater sustainability plan has been adopted for the area. Therefore, the project would not conflict with any sustainable groundwater management plan.

Mitigation Measures

Mitigation Measure HYDRO-1: Protection of NMWD Water Supply Wells

Modify Leach Field to Avoid Protection Zone

The Applicant shall modify the leach field design to avoid application of treated wastewater within the Zone A Protection Zone of NMWD groundwater supply wells.

Design Review

Design of the tertiary treated wastewater system is subject to review by the San Francisco Bay Regional Water Quality Control Board and Division of Drinking Water and permitting by the

San Francisco Bay Regional Water Quality Control Board. The proposed wastewater system will require a Report of Waste Discharge Form 200 and a Title 22 Engineering Report as part of the application process to meet the Waste Discharge Requirements of the State. The Title 22 Engineering Report shall also be submitted to the NMWD and County for informational purposes.

Use of Wastewater for Irrigation: Timing

Tertiary treated wastewater shall not be applied to landscaping irrigation within 24 hours of forecasted precipitation with a greater than 50-percent probability of occurring, during precipitation events, or when the land application area surface soil is saturated. Application of treated wastewater for landscape irrigation shall further only occur when the depth to groundwater in the area of irrigation is a minimum of 4.5 feet or more below the ground surface, based on groundwater monitoring data allowing a minimum of 3 feet of separation between the drip dispersal and the groundwater table. Application of treated wastewater for irrigation shall not exceed the agronomic rate[3]. The agronomic rate will be monitored daily using an onsite irrigation controller to determine real time daily evapotranspiration rates and calculate run times for wastewater dispersal for irrigation.

Monitoring of Effluent

Monitoring of the effluent from the wastewater treatment system shall be completed per the Regional Water Quality Control Board issued Monitoring and Reporting Program included in the Notice of Applicability for enrollment in the 2014 WDR General Order. The Notice of Applicability must be issued prior to recycled water production and use. Constituents that would be monitored and reported on are listed in the table below.

Should the effluent exceed the UV transmittance threshold specified in the National Water Research Institute Ultraviolet Disinfection Guidelines for Drinking Water and Water Reuse, turbidity threshold of 10 NTU at any time,, or other standard specified in the Notice of Applicability for enrollment in the 2014 WDR General Order, the treated wastewater shall not be applied within any area within the NMWD Zone A Protection Zone, including any portion of the leach field located in the Zone A Protection Zone. No application of effluent shall be allowed within the Zone A Protection Zone until the treatment system is repaired and the effluent quality is demonstrated to meet the water quality objectives. During periods when the effluent is not meeting water quality standards specified in the Notice of Applicability for enrollment in the 2014 WDR General Order, the effluent shall be stored in a tank and

[3] The agronomic rate is defined as "The rate of application of recycled water to plants necessary to satisfy the plants' evapotranspiration requirements, considering allowances for supplemental water (e.g., effective precipitation), irrigation distribution uniformity, and leaching requirement, thus minimizing the movement of nutrients below the plants' root zone."

transferred to a wastewater treatment facility, if needed while maintenance is conducted on the wastewater treatment system.

Constituent	Units	Sample type	Reporting frequency
Influent TN	mg/L	Grab	Quarterly
Flow rate (effluent)	gpd	Meter	Quarterly
BOD (effluent)	mg/L	Grab	Quarterly
Nitrogen series (effluent)[1]	mg/L	Grab	Quarterly
Total suspended solids (effluent)	mg/L	Grab	Quarterly
Total coliform bacteria (downstream of disinfection units)	MPN/100 mL	Grab	Quarterly
Turbidity (downstream of disinfection units)	NTU	Meter	Quarterly
UV dose	mJ/cm^2	Meter / Calculate	Quarterly
UV transmittance	%	Meter	Quarterly

Groundwater Monitoring

A Groundwater Monitoring and Mitigation Plan (GMMP) shall be prepared for the project by a qualified hydrologist or hydrogeologist. The groundwater quality monitoring program must comply with monitoring and reporting requirements issued by the Regional Water Quality Control Board. The GMMP shall include specifics on the procedures and timing for groundwater monitoring and reporting as well as action criteria and responses to action criteria. At a minimum, the GMMP shall include:

- Quarterly groundwater sampling and water quality monitoring between the irrigated areas and NMWD wells using the existing wells CG-2 and CG-3 and two additional monitoring wells
- Quarterly reporting to RWQCB, NMWD, and the County with the results of the monitoring program
- Performance criteria:
  - The water quality within the groundwater monitoring wells between the area of application and NMWD drinking water wells shall not exceed 10 mg/L of nitrate (NO3) . Nitrate is used as an indicator of the treated wastewater given that the background levels of nitrate are less than the treatment standard for the wastewater system.
- Corrective actions: If the intervening groundwater well(s) indicate an exceedance of 10 mg/L nitrate, effluent application shall cease in the vicinity of the monitoring well where the exceedance is detected. Additional corrective actions including but

not limited to, repairs or replacement of equipment, additional monitoring, or other actions, will be defined as appropriate depending on the exceedance detected and potential causes of the exceedance.

Reporting

Any violation of the RWQCB permit conditions shall require immediate notification to the RWQCB with a report filed within five (5) business days documenting the violation and corrective actions taken to address the violation.

Water quality monitoring reports shall be prepared quarterly and submitted to the RWQCB, NMWD, and County for review. The quarterly reports shall contain the daily and monthly groundwater and effluent monitoring results for the prior quarter, identify any exceedances of the water quality standards or performance criteria, and actions taken to address the exceedance. An annual report shall also be submitted to the RWQCB consistent with all regulatory requirements and permit conditions. Reporting frequency may be reduced or may cease if NMWD ceases use and abandons the groundwater supply wells on the project site.

Alternative Uses of Treated Effluent

Alternative uses of treated effluent may also include but not be limited to the following and would be based on Regional Water Board and Division of Drinking Water approval:

- Use in off-site landscaping
- Recycled water refill station

Mitigation Measure HYDRO-2: Avoid Equipment Staging and Storage in 100-Year Floodplain

All equipment staging and storage areas shall be located outside of the 100-year floodplain. Any equipment-refueling activities shall be conducted within designated staging or storage areas with secondary containment for any potential spills of fuel.

3.2.11 Land Use and Planning

Environmental Impacts	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
11. LAND USE AND PLANNING. Would the project:				
a) Physically divide an established community?	☐	☐	☐	☒
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☒	☐	☐

Environmental Settings

The project site is located in the Coastal Zone within unincorporated Marin County and is subject to the Marin County LCP. The majority of the project site has a land use designation of Coastal Open Space and is zoned C-OA-Coastal, Open Area. A small portion of the western edge of the project site is designated Coastal Single Family and is zoned C-RA-B3-Coastal, Residential, Agriculture. Land uses immediately surrounding the project site include residential development to the west, an undeveloped lot to the north, and open space along Lagunitas Creek to the east and south.

Discussion

a) Would the Project physically divide an established community?

The physical division of an established community typically refers to the construction of a physical feature (such as an interstate highway or railroad tracks) or removal of a means of access (such as a local road or bridge) that would impair mobility within an existing community or between a community and an outlying area. The project site is located on the southern limits of the developed residential area in Point Reyes. The project would rehabilitate the existing residential structures at the site. The project does not involve construction of any physical features or removal of access that would physically divide an established community. Therefore, no impact would occur.

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

The LCP contains several policies that were adopted to avoid or mitigate environmental effects. Table 3.2-12, below, identifies LCP policies applicable to the proposed project and, for each policy, evaluates whether the project would be consistent with the policy. As summarized in Table 3.2-12, the project would be consistent with all LCP policies relevant adopted for the purpose of avoiding or mitigating environmental effects; therefore, the impact would be less than significant.

Table 3.2-12 LCP Land Use Plan Policies

Policy	Consistency Determination
C-BIO-2 ESHA Protection. 3. Protect ESHAs against distribution of habitat values and only allow uses within those areas that are dependent on those resources or otherwise specifically provided in C-BIO-14 (Wetlands), C-BIO-15 (Diking, Filling, Draining, and Dredging) or C-BIO-23 (Coastal Streams and Riparian Vegetation). Distribution of habitat values includes when the physical habitat is significantly altered or when species diversity or the abundance or viability of species population is reduced. The type of proposed development, the particulars of its design, and its location in relation to the habitat areas, will affect the determination of distribution. 4. Accessways and trails that are fundamentally associated with the interpretation of the resource are resource dependent uses that shall be sited and designed to protect ESHAs against significant disruption of habitat values in accordance with Policy C-BIO-2.1. Where it is not feasible to avoid ESHA, the design and development of accessways and trails shall minimize intrusions to the smallest feasible area and least impacting routes. As necessary to protect ESHAs, trails shall incorporate measures to control the timing, intensity or location of access (e.g., seasonal closures, placement of boardwalks, limited fencing, etc.). 5. Avoid fence types, roads, and structures that significantly inhibit wildlife movement, especially access to water. 6. Development proposals within or adjacent to ESHA will be reviewed subject to a biological site assessment prepared by a qualified biologist hired by the County and paid for by the applicant. The purpose of the biological site assessment is to confirm the extent of the ESHA, document any site constraints and the presence of other sensitive biological resources, recommend buffers, development timing, mitigation measures including precise required setbacks, provide a site restoration program where necessary, and provide other information, analysis and modifications appropriate to protect the resource.	3. The project has been designed to avoid development within ESHA and ESHA buffers, as shown in Figure 2.2-3. The project area currently contains nonconforming structures/uses within the 100-foot seasonal wetland ESHA buffer. As a result, the project would require a reduced 50-foot buffer to remove the nonconforming structure and construction bioretention areas and install landscaping. Because the activities within the wetland buffer remove existing nonconforming structures and replace those structures with bioretention facilities that would improve habitat values, the project is consistent with the policy C-BIO-2, item 3. 4. The project does not involve construction of any new accessways or trails. The project would not conflict with policy C-BIO-2 ESHA, item 4, because no accessways or trails would be installed in ESHA. 5. The project would not install any new roads or fences. The project would therefore not conflict with policy C-BIO-2 ESHA, item 5, because no fences, roads, or other structures would be installed that would inhibit wildlife movement. 6. A biological site assessment was prepared for the project site by a qualified biologist. The biological site assessment provides the extent of ESHA and documents site constraints and the presence of sensitive biological resources. The biological site assessment is provided in Appendix B. The project would not conflict with policy C-BIO-2-ESHA, item 6, because a biological site assessment has been prepared.
C-BIO-3 ESHA Buffers. 1. In areas adjacent to ESHAs and parks and recreation areas, site and design development to	The project site contains four aquatic ESHAs including perennial stream, riparian arroyo willow thicket, Corps seasonal wetland (three parameter), and CCC seasonal

Policy	Consistency Determination
prevent impacts that would significantly degrade those areas, and to be compatible with the continued viability of those habitat and recreation areas. 2. Provide buffers for wetlands, streams and riparian vegetation in accordance with C-BIO-18 and C-BIO-23, respectively. 3. Establish buffers for terrestrial ESHA to provide separation from development impacts. Maintain such buffers in a natural condition, allowing only those uses that will not significantly degrade the habitat. Buffers for terrestrial ESHA shall be 50 feet, a width that may be adjusted by the County as appropriate to protect the habitat value of the resource, but in no case shall be less than 25 feet. Such adjustment shall be made on the basis of a biological site assessment supported by evidence that includes but is not limited to: a. Sensitivity of the ESHA to disturbance; b. Habitat requirements of the ESHA, including the migratory patterns of affected species and tendency to return each season to the same nest site or breeding colony; c. Topography of the site; d. Movement of stormwater; e. Permeability of the soils and depth to water table; f. Vegetation present; g. Unique site conditions; h. Whether vegetative, natural topographic, or built features (e.g., roads, structures) provide a physical barrier between the proposed development and the ESHA; and i. The likelihood of increased human activity and disturbance resulting from the project relative to existing development.	wetland (one parameter). The LCP requires a 50-foot setback from riparian arroyo willow thicket and a portion of the perennial stream (Lagunitas Creek) within the project site and requires a 100-foot buffer from periphery of seasonal wetlands. Due to the previously developed nature of the project area, which includes existing structures and uses within the 100-foot wetland ESHA buffer, work cannot be avoided within the minimum 100-foot wetland ESHA buffers. The activities proposed within the 100-foot wetland ESHA buffers include removal of existing non-residential construction and installation of new bioretention areas and landscaping, which would provide a long-term benefit to vegetation, hydrology, and habitat. The adjustment to the standard ESHA buffer was made on the basis of the biological site assessment (Appendix B) and the proposed benefits of the activities within the reduced ESHA buffer. The project would not conflict with policy C-BIO-3 ESHA buffers because the project applies the required ESHA buffers, with the exception of areas required to remove existing structures and provide benefits to ESHA.
C-BIO-4 Protect Major Vegetation. Require a Coastal Permit for the removal or harvesting of major vegetation other than for agricultural purposes. Such major vegetation removal shall avoid ESHA, ESHA buffers, coastal waters, and public views, and shall not conflict with prior conditions of approval.	Per the LCP, major vegetation includes any vegetation that is in ESHA or its buffer or heritage trees. The project includes removal of seven trees within the ESHA buffer, which are predominantly eucalyptus, dead trees, and other ornamental trees. None of the trees proposed for removal are on the Marin County LCP-Implementation Plan list of Heritage or Protected Trees. Implementation of the project would not conflict with C-BIO-4 because the few trees removed from ESHA are not protected trees.

Policy	Consistency Determination
C-BIO-5 Ecological Restoration. Encourage the restoration and enhancement of degraded ESHAs and the creation of new ESHAs, and streamline regulatory processes whenever possible to facilitate the successful completion of restoration projects.	The project would remove existing structures from an ESHA buffer and would install bioretention facilities that help improve water quality within the ESHA, and the project would be consistent with policy C-BIO-5.
C-BIO-10 Roosting and Nesting Habitat. Prohibit the alteration or removal of groves of trees that provide colonial nesting and roosting habitat for monarch butterflies or other wildlife, except where the trees pose a threat to life or property.	The project would remove diseased eucalyptus that would present a risk to life and property and would not remove any groves of trees. The eucalyptus tree removal timing would also be scheduled to avoid the roosting season for monarch butterflies, consistent with Mitigation Measure BIO-1. The project would be consistent with policy C-BIO-10 with implementation of mitigation.
C-BIO-11 Development Adjacent to Roosting and Nesting Habitat. Development adjacent to wildlife nesting and roosting areas shall be set back a sufficient distance to protect against disruption in nesting and roosting activities and designed to avoid impacts on the habitat area. Time such development activities so that disturbance to nesting and breeding wildlife is avoided. To the extent feasible, use native vegetation for landscaping.	The project would implement Mitigation Measures BIO-1, BIO-2. and Marin Development Code section 22.20.040 to avoid any project activities such as tree removal or structure demolition during times that could disrupt roosting or nesting habitat to the extent feasible and when avoidance of the nesting and roosting season is not feasible, ensuring the removal is completed under the direction of a qualified biologist to avoid impacts on any nesting or roosting behavior. Because the project would implement ESHA buffers, enhance native vegetation through planting native species, and implement Mitigation Measures BIO-1, BIO-2 and Marin Development Code section 22.20.040, the project would not conflict with policy C-BIO-11, and the impact would be less than significant with mitigation incorporated.
C-WR-2 Water Quality Impacts of Development Projects. Site and design development, including changes in use or intensity of use, to prevent, reduce, or remove pollutant discharges and to minimize increases in stormwater runoff volume and rate to prevent adverse impacts to coastal waters to the maximum extent practicable. All coastal permits, for both new development and modifications to existing development, and including those for developments covered by the current National Pollutant Discharge Elimination System (NPDES) Phase II permit, shall be subject to this review. Where required by the nature and extent of a proposed project and where deemed appropriate by County staff, a project subject to this review shall have a plan which addresses both temporary (during construction) and permanent (post-construction) measures to control erosion and sedimentation, to reduce or prevent pollutants from entering storm drains, drainage systems	The project has been sited on the location of former housing and would use the existing residential structures and impervious surfaces to reduce the potential for changes in runoff volume. The project would comply with the current NPDES Phase II permit, as discussed in Section 3.2.10 and the Stormwater Control Plan (Appendix G). The project design includes permanent BMPs, including new bioretention areas to provide treatment of stormwater runoff from the site. As discussed above, the project would also minimize impervious surfaces by using existing paved surfaces and structures thereby limiting areas of new disturbance. Because the project would comply with the NPDES Phase II permit and includes permanent BMPs consistent with policy C-WR-2, the project would be consistent with LCP policy C-WR-2, and the impact would be less than significant.

Policy	Consistency Determination
and watercourses, and to minimize increases in stormwater runoff volume and rate. Permanent Best Management Practices (BMPs) that protect water quality and minimize increases in runoff volume and rate shall be incorporated in the project design of developments. Site design and source control measures shall be given high priority as the preferred means of controlling pollutant discharges and runoff volume and rate. Typical measures shall include: 1. Minimizing impervious area; 2. Limiting site disturbance; 3. Protecting areas that are particularly susceptible to erosion and sediment loss, ensuring that water runoff beyond pre-project levels is retained on site whenever possible, and using other Low Impact Development (LID) techniques; and 4. Methods that reduce potential pollutants at their sources and/or avoid entrainment of pollutants in runoff. Such methods include scheduling construction based on time of year, prohibiting erosion-causing practices, and implementing maintenance and operational procedures. Examples include covering outdoor storage areas, using efficient irrigation, and minimizing the use of landscaping chemicals.	
C-DES-I Compatible Design. Ensure the siting, height, scale, and design (including materials and color) of new structures are compatible with the character of the surrounding natural and built environment. Structures shall be designed to follow the natural contours of the land and shall limit reflectivity of glass and other surfaces.	The project would repurpose existing buildings and would not change the siting, height, or scale of the structures. As discussed in Aesthetics impact discussion c) above, the site has minimal visibility from surrounding areas, and the reuse of the existing structures with affordable housing would be compatible with the character of the natural and built environment. As discussed in Aesthetics impact discussion d) above, the site would not generate glare on surrounding areas. The glass/windows would replace existing windows. The project would be consistent with policy C-DES-I, and the impact would be less than significant.
C-DES-8 Protection of Trees. Site structures and roads to avoid removal of trees that contribute to the area's scenic and visual resources, except where required to maintain defensible space for structures or eliminate diseased trees that threaten surrounding structure or vegetation and where removal is otherwise consistent with LCP policies. Dead trees may serve as valuable habitat for some species, so avoid complete removal where appropriate.	The project includes removal of a total of 32 trees. None of the 32 trees that would be removed contribute to the area's scenic and visual resources. As discussed in Section 3.2.1, the project site has very minimal visibility to any area outside of the project site. In addition the 32 trees that would be removed are non-native ornamental trees or dead trees. The project would also involve the planting of 47 trees and result in a net increase of 9 trees in the area. Because the roads and structures are existing roads and structures, the trees would not be

Policy	Consistency Determination
	removed for siting of any roads or structures. Therefore, the project is consistent with policy C-DES-8, and the impact would be less than significant.

Mitigation Measures

Mitigation Measures BIO-1 and BIO-2 (see section 3.2.4).

3.2.12 Mineral Resources

Environmental Impacts	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
12. MINERAL RESOURCES. Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	☒

Discussion

a) Would the Project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

Mining operations in the County primarily consist of crushed stone and alluvial deposits for construction materials, including asphaltic concrete, aggregate, road base and sub-base, and Portland cement concrete. Eight sites in the County have been designated by the State as having significant mineral resources. The project site is not located within a Mineral Resource Preservation Site designated by the State (County of Marin 2007).

The project site is currently developed with residential buildings. Furthermore, the proposed project site is surrounded by residential uses that are not compatible with mineral resource extraction activities. Because the site is currently developed with residential development, the residential use and occupation of the site would have no impact from loss of availability of known mineral resources.

b) Would the Project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

Refer to impact discussion a), above. The project would not result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan. No impact would occur.

Mitigation Measures

None Required.

3.2.13 Noise

Environmental Impacts	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
13. NOISE. Would the project result in:				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☒	☐
b) Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

Environmental Setting

Existing Noise Environment

Background noise levels in the project vicinity are generally low and consistent with low-density residential uses. Noise sources include vehicles on Commodore Webster Drive, SR-1, and Point Reyes Petaluma Road. The ambient noise level on the project site is assumed to be typical of a quiet, rural region, between 40 dBA and 55 dBA.

Noise Standards

Federal and State Guidance

CEQA does not specify a numerical threshold for "substantial increases" in noise, and no federal regulations that limit overall environmental noise levels are established; however, federal guidance documents address environmental noise and regulations for specific sources. The EPA published *Information on Levels of Environmental Noise Requisite to Protect Public Health and Welfare with an Adequate Margin of Safety* in 1974, which provides information for state and local governments to use in developing their own ambient noise standards. The EPA determined that a day–night sound level of 55 dBA protects the public from indoor and outdoor activity interference.

The EPA, the Federal Highway Administration (FHWA), and the U.S. Department of Transportation (USDOT) have developed guidelines for noise. Under the authority of the Noise Control Act of 1972, the EPA established noise emission criteria and testing methods, published at 40 CFR part 204, which apply to some construction and transportation equipment (portable

air compressors and medium- and heavy-duty trucks). These regulations apply to trucks that would transport equipment to the proposed project site.

Marin County Code

The County has developed noise standards for offensive noise, which includes construction noise. Section 6.70.030 Enumerated Noises of the Marin County Code places restrictions on construction hours to limit noise nuisances. The County Code allows construction from 7 a.m. to 6 p.m. Monday through Friday and 9 a.m. to 5 p.m. on Saturday. Construction on Sundays and holidays is prohibited unless for emergencies or minor work or with written approval from the community development director. Section 6.70.030 is provided below:

5) Construction Activities and Related Noise.
    a) Hours for construction activities and other work undertaken in connection with building, plumbing, electrical, and other permits issued by the community development agency shall be limited to the following:
        i. Monday through Friday: seven a.m. to six p.m.
        ii. Saturday: 9 am to 5 pm
        iii. Prohibited on Sundays and Holidays (New Year's Day, President's Day, Memorial Day, Independence Day, Labor Day, Thanksgiving Day, and Christmas Day.)
    b) Loud noise-generating construction-related equipment (e.g., backhoes, generators, jackhammers) can be maintained, operated, or serviced at a construction site for permits administered by the community development agency from eight a.m. to five p.m. Monday through Friday only.
    c) Special exceptions to these limitations may occur for:
        i. Emergency work as defined in Section 22.130.030 of this code provided written notice is given to the community development director within forty-eight hours of commencing work;
        ii. Construction projects of city, county, state, other public agency, or other public utility;
        iii. When written permission of the community development director has been obtained, for showing of sufficient cause;
        iv. Minor jobs (e.g., painting, hand sanding, sweeping) with minimal/no noise impacts on surrounding properties;
        v. Modifications required by the review authority as a discretionary permit condition of approval.

Marin Countywide Plan

The Marin Countywide Plan sets acceptable noise levels for a variety of activities and types of land uses (see Figure 3-41 in Marin Countywide Plan) (County of Marin 2007). The Marin Countywide Plan provides practicable noise contours for the major noise sources down to a level of annual average 60 Ldn. The project site is adjacent areas designated as Residential – Multi-Family, which has an exterior noise standard of 50 to 65 dB for a normally acceptable level. The benchmark for allowable noise during nighttime hours 11 p.m. to 7 a.m. is 45 dB Leq.

The major noise sources for which noise contours have been developed in Marin County include major highways (Highway 37, Highway 101, and Highway 1) and major county roads (including Petaluma–Point Reyes Road).

Groundborne Vibrations

Vibrating objects in contact with the ground radiate energy through the ground. Vibratory motion is commonly described by identifying the *peak particle velocity* (PPV). PPV is generally accepted as the most appropriate descriptor for evaluating the potential for building damage (Caltrans 2013). Table 3.2-13 provides the vibratory thresholds for damage to structures, depending on the type of construction. Background vibration levels on the proposed project site are low. Sources of vibration include vehicles traveling on Commodore Webster Drive, SR-1, and Point Reyes–Petaluma Road. These sources create negligible levels of vibration.

Table 3.2-13 Construction Vibration Damage Criteria

Building category	PPV (inch per second [in./sec])
Reinforced-concrete, steel, or timber (no plaster)	0.5
Engineered concrete and masonry (no plaster)	0.3
Non-engineered timber and masonry buildings	0.2
Buildings extremely susceptible to vibration damage	0.12

Source: (Federal Transit Administration FTA 2018)

The County has not established quantitative vibration thresholds to regulate construction or operational related vibration. Caltrans recommends a vibration limit of 0.5 in./sec PPV for buildings structurally sound and designed to modern engineering standards, 0.3 in./sec PPV for buildings that are found to be structurally sound but where structural damage is a major concern, and a conservative limit of 0.08 in./sec PPV for old buildings or buildings that are documented to be structurally weakened (Caltrans 2020).

Sensitive Noise Receptors

Noise-sensitive land uses generally include those areas of habitation where the intrusion of noise could adversely affect occupancy, use, or enjoyment of the environment. The Marin Countywide Plan defines a *sensitive receptor* as a facility in which a number of individuals are highly susceptible to the adverse effects of air pollutants or noise (County of Marin 2007). The project site is bounded by the Point Reyes Affordable Homes to the west, an undeveloped lot to the north, and Lagunitas Creek to the east and south. Sensitive receptors in the vicinity of the proposed project site are residences at Point Reyes Affordable Homes located approximately 50 feet from the project site. The West Marin Elementary School is located approximately 0.25 mile north of the project site.

Discussion

a) Would the Project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Construction

Ambient noise levels in the proposed project vicinity are generally low and mostly consist of natural noises and human-made noises from nearby residents. Construction would occur over 12 to 24 months. Construction of the proposed project would generate a short-term increase in noise due to use of heavy equipment. Construction of the project would include typical heavy construction equipment including, but not limited to, excavators, backhoes, bobcats, manlifts, and extension forklifts. A detailed list of proposed construction equipment is included in Table 2.4-1. Estimated noise levels from construction equipment at 50 feet from the noise source are presented in Table 3.2-14, below.

Table 3.2-14 Construction Equipment Noise Levels

Equipment	L_{max} (dBA) at 50 feet	L_{eq} (dBA) at 70 feet	L_{eq} (dBA) at 85 feet
Manlift	75	72	70
Forklift	79 to 84	76 to 81	74 to 79
Pavers	77	74	72
Rollers	80	77	75
Dozers	82	79	77
Note: Based on an estimate, not an actual measurement.			

Source: (Federal Transit Administration 2018)

The nearest sensitive receptor is located approximately 50 feet from the project. Noise generated during the construction period would be sporadic and vary on a day-to-day basis, depending on the specific activities being undertaken at any given time. The County Code does not place a noise limit on construction noise. However, the County does place restrictions on allowable construction hours to limit noise nuisances. Construction would occur between the hours of 7 a.m. and 6 p.m. on Monday through Friday and between the hours of 9 a.m. and 5 p.m. on Saturday. No work would occur on Sundays or holidays. The proposed work schedule complies with the County Code (Section 6.70.030). Compliance with the County Code would ensure less-than-significant impacts during construction.

Operation

Once construction is complete, occupancy of the residential properties would generally produce noise that is typical for a residential neighborhood, which is consistent with the surrounding conditions. The project includes four amplified special events per year. Marin County Code section 6.70.030 prohibits use of amplified sound between the hours of 11 p.m. and 7 a.m.

Because the special events would be required to comply with Marin County Code and would not produce amplified sound between the hours of 11 p.m. and 7 a.m., the impact from generation of noise during special events would be less than significant.

The on-site water treatment system would include pumps, aeration blowers, and a backup emergency generator to ensure consistent power supply during periodic power outages. The emergency generator is located adjacent the leech field and treatment building along the southern boundary of the project site. The emergency generator is located approximately 150 feet from the nearest residential receptor. Furthermore, the emergency generator would only be used sporadically in the case of emergencies causing power outages (e.g., storm events). All wastewater system equipment will either: (1) be inside enclosures, or (2) inside tanks below grade, accessed through manholes, which minimizes noise above-ground. The selected treatment technology includes a membrane-aerated bioreactor (MABR), which utilizes only low pressure blowers, which produce minimal noise. While the noise would be minimized by the enclosure, the specific equipment and enclosure design are subject to further engineering and design. The noise from operation of the wastewater treatment equipment has the potential to exceed the nighttime noise standard of 45 dB Leq at the nearest residential property. Exceedance of the County noise standards for residential areas would be a significant impact. Mitigation Measure NOI-1 specifies standards for the wastewater treatment plant design to reduce noise to a less than significant level. The impacts from operation would be less than significant with mitigation.

b) Would the Project result in generation of excessive groundborne vibration or groundborne noise levels?

Groundborne vibrations would be generated during project construction because of the use of construction equipment and the presence of truck traffic. The proposed project would utilize bulldozers, rollers, and a drill rig that could generate groundborne vibration, as presented in Table 3.2-15, below. However, no construction equipment that could generate high levels of groundborne vibration (e.g., pile driving) would be utilized. The project area is located in an area with modern construction, where the vibration threshold for damage to structures is 0.3 PPV (in./sec). None of the equipment that would be used during construction of the project would exceed 0.3 PPV at a distance of 25 feet, and the nearest receptor, approximately 50 feet west, is not expected to experience vibrations. Operation of the proposed project would not generate groundborne vibration. Because the proposed project would not generate groundborne vibration that would exceed thresholds, the impacts from groundborne vibration would be less than significant.

Table 3.2-15 Vibration Velocities for Construction Equipment

Equipment	Reference PPV at 25 feet (in./sec)	PPV at 5 feet (in./sec)
Large bulldozer [a]	0.089	0.523

Equipment	Reference PPV at 25 feet (in./sec)	PPV at 5 feet (in./sec)
Small bulldozer [b]	0.003	0.018
Loaded trucks	0.076	0.446

Notes:

[a] *Large bulldozer* is used to represent vibration velocity for a medium excavator.

[b] *Small bulldozer* is used to represent vibration velocity for a small excavator.

Source: (Federal Transit Administration 2018)

c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

The proposed project is not located within 2 miles of a public airport, within an existing or projected airport land use plan, or in the vicinity of a private airstrip. The closest airport is the Marin County Airport, approximately 14 miles east of the project site. No impact would occur.

Mitigation Measures

Mitigation Measure NOI-1: Design of Wastewater Treatment System

The wastewater treatment system, including enclosures, shall be designed so that noise levels generated by the wastewater treatment system do not exceed 45 dB at the nearest residential property line adjacent the wastewater treatment system. A Noise Mitigation Plan, including the final wastewater treatment plan operational equipment noise levels, proposed enclosures, and any noise attenuation devices shall be submitted to the County at least 60 days prior to construction of the wastewater treatment system. The County may specify additional measures to reduce noise levels from the wastewater treatment system during the design review process.

3.2.14 Population and Housing

Environmental Impacts	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
14. POPULATION AND HOUSING. Would the project:				
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☒	☐
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

Environmental Settings

The project site currently contains 11 residential structures that were previously used at USCG housing. The residential structures on the project site are currently unoccupied.

Housing & Safety Element Update to the Marin Countywide Plan

A Housing Element is required to identify an adequate number of sites to meet the number of housing units assigned to the County by the Regional Housing Need Allocation (RHNA). As part of the most recent Housing & Safety Element Update to the Marin Countywide Plan, the County considered site locations throughout unincorporated county areas to meet its goal of affirmatively furthering fair housing. The Housing Element also provides the policy framework and identifies actions the County will take to remove housing constraints and promote housing that addresses community needs.

The initial site identification process studied up to 10,993 units on 150 possible "Candidate Housing Sites" that were suitable for residential development within the Housing Element planning period of 2023 through 2031. The unit development potential includes Accessory Dwelling Units, and Density Bonus allowances. After consideration of community input and environmental hazards, the Marin County Planning Commission and Board of Supervisors selected from the Candidate Housing Sites to identify the "Project Sites" to meet the County's RHNA of 3,569 units. The proposed project site was included and analyzed as a Project Site towards meeting the County's RHNA.

Discussion

a) Would the Project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

The project proposes to redevelop an existing site with 54 housing units (53 affordable housing units and one manager's unit). The project is estimated to have 215 residents, based on the distribution of four-bedroom, two-bedroom, and one-bedroom apartment units. It is expected that residents will be existing residents of Marin County; however, some residents could be new residents to the County and possibly to the greater Bay Area. The residential units on the site were previously occupied by a comparable number of people to those who would be living in the new affordable housing units. This would not cause unplanned population growth as the population of the site was previously planned for when the site was first developed in 1974.

Given the project would create affordable housing in an area where the need outweighs the existing stock, it is not expected to induce population growth. The existing lack of affordable housing in the region suggests the project could help to address the housing crisis and house people in the community who are currently unhoused or facing displacement. Because the project would replace existing housing with a similar number of units and the project would create affordable housing, the impact on population growth would be less than significant.

b) Would the Project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

The project would not displace any people or housing. The housing units on the project site are currently unoccupied, and the project would allow for future occupation of those same residential units. No residential units would be displaced. Therefore, no impact would occur.

Mitigation Measures

None required.

3.2.15 Public Services

Environmental Impacts	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
15. PUBLIC SERVICES.				
a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
Fire protection?	☐	☐	☒	☐
Police protection?	☐	☐	☒	☐
Schools?	☐	☐	☒	☐
Parks?	☐	☐	☒	☐
Other public facilities?	☐	☐	☒	☐

Environmental Settings

The public services located in proximity to the project site are shown on Figure 3.2-4.

Fire protection

The nearest fire department to the project site is the Marin County Fire Department station located in Point Reyes Station, located approximately 0.2 mile northwest of the project site, located at corner of 4th Street and B Street.

Police protection

The Marin County Sherriff's Office is located adjacent the fire department in Point Reyes Station, approximately 0.2 mile northwest of the project site.

Schools

The project is located within the Shoreline Unified School District. Schools that would serve the project site include West Marin Elementary School (kindergarten through eighth grade), located approximately 0.1 mile north of the project site, and Tomales Bay High School, located approximately 18 miles north of the project site.

Figure 3.2-4 Public Services

Source: (Maxar, 2021; Siegal & Strain Architects, 2023; County of Marin, 2023; County of Marin, 2023; California Protected Areas Database, 2023; County of Marin, 2023)

Parks
The project site is located in proximity to Tomales Bay and Point Reyes National Seashore, which are popular tourist destinations attracting approximately 2.5 million visitors annually. No County parks are located in proximity to the project site.

Other public facilities
Other public facilities include other government and municipal buildings or facilities such as libraries, post offices, or hospitals. The Point Reyes Station Library and post office are located within 0.25 mile northwest of the project site. The nearest hospital to the project site is the West Marin Medical Center, located directly west of the project site.

Discussion

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

Fire and Police Services
Fire and emergency response would be provided by Marin County Fire Department, and law enforcement would be provided by Marin County Sheriff's Office. The Marin County Fire Department and Marin County Sheriff's Office sub-station are located in the same building, which also contains the HAM radio disaster communication command center. The fire station includes five units: Structural Firefighting Engine, a wildland firefighting engine, a paramedic rescue ambulance, a utility pick-up truck, and a flood evacuation boat.

The project site was previously occupied by residences when it was used as USCG housing. The reoccupation of the site for affordable housing with a total of 54 units would not result in the need for new or physically altered government facilities. The new residential facilities would be within existing residential areas within Point Reyes that are already served by the existing fire department and sheriff's office. The reoccupation of the site would not create a need for new fire protection and police facilities. Therefore, there would be no impact from the construction of fire or police facilities, and the impact on fire and police services would be less than significant.

Schools
West Marin Elementary School has a current enrollment of 121 students, and Tomales High school has an enrollment of 143 students (California Department of Education 2023). The previous use of the site as USCG housing generated students that attended the local school district. Reoccupation of the project site would generate students who would attend local schools. Because there is sufficient capacity for the students at the local schools, the project would not create the need for new schools, and the impact would be less than significant.

Parks

The project involves rehabilitation of existing housing units to allow for affordable housing. The reoccupation of the existing housing units for affordable housing would not generate a need for new parks and would not affect existing parks as there are no County parks in proximity to the project site. The primary demand for parks/recreation in the area (including the nearby Point Reyes National Seashore, managed by the NPS) is tourist traffic. The impact of the project on the need for new or physically altered parks would therefore be less than significant.

Other Public Facilities

The project would not require other public facilities or result in the need for physically altered facilities. The demand for other public facilities would be similar under existing conditions and after construction of the project because the project would replace existing housing units and would generate a small number of residents. The impact on other public facilities would therefore be less than significant.

Mitigation Measures

None required.

3.2.16 Recreation

Environmental Impacts	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
16. RECREATION.				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☒	☐
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☒	☐

Environmental Settings

The project is located within unincorporated Marin County. Marin County Parks manages approximately 932 acres of parks, including playing fields, pools, golf courses, tennis and volleyball courts, skate parks, and children's playgrounds (County of Marin 2007). The project is also located near NPS Point Reyes National Seashore, which attracts approximately 2.5 million visitors per year.

Discussion

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

The project could result in an incremental increase in the use of parks, but the amount of additional use would be negligible relative to the existing use of parks and other recreational facilities. This incremental increase in usage would not result in substantial physical deterioration of the facilities. Therefore, a less than significant impact would occur.

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

The project site currently includes an aboveground pool and spa, which would be demolished and replaced with a new playground, multi-sport court, and resident gathering spaces. An existing tennis court would be removed and regraded to natural conditions and planted with native species to improve ecological functions, permeability, and drainage. Because the project would replace existing recreational facilities in the same area and would not create any new recreational facilities in undisturbed areas, the recreational facilities would not result in an adverse physical effect on the environment, and the impact would be less than significant.

Mitigation Measures

None required.

3.2.17 Transportation

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

Environmental Settings

Access to the project site would be provided by Commodore Webster Drive from Mesa Road and State Highway 1. Internal vehicular circulation is provided by Commodore Webster Drive. Commodore Webster Drive is an existing paved, two-lane private road that terminates at the southeastern end of the project site. There are existing Class III bicycle routes on Point Reyes–Petaluma Road between State Highway 1 and Platform Bridge Road and on Sir Francis Drake Boulevard to the west of Point Reyes Station (Figure 3.2-5).

Discussion

a) Would the Project conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

The Marin County Countywide Plan establishes a *level of service* (LOS) standard of LOS D or better for urban and suburban arterials and LOS E or better for freeways and rural expressways. However, SB 743, which was passed in 2013, adopted vehicle miles traveled (VMT) as a metric for assessing transportation impacts under CEQA, which is detailed below. The proposed redevelopment of the site from the former USCG housing units to affordable housing in an area that is currently serviced by existing roads would not require any new roads and would not conflict with policies related to non-motorized travel such as transit, roadway, bicycle, or pedestrian facilities. The project would provide 119 parking spaces, including eight ADA compliance spaces and 24 electric vehicle spaces as well as 62 long-term and 44 short-term bicycle parking spots. The proposed parking accessibility, electric vehicle parking, and bicycle parking would be consistent with policies for the transit system. Therefore, the project would not conflict with any program or policy addressing the circulation system, and the impact would be less than significant.

Figure 3.2-5 Roadway Network

b) Would the Project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

In accordance with the *Technical Advisory on Evaluating Transportation Impacts in CEQA*, Section 21099 of the Public Resources Code states that the criteria for determining the significance of transportation impacts must promote 1) reduction of GHG emissions; 2) development of multimodal transportation networks; and 3) a diversity of land uses (Governor's Office of Planning and Research 2018). The Governor's Office of Planning and Research (OPR) identifies screening thresholds to identify projects that would have a less than significant impact based on project size, project type, and transit availability. Based on OPR thresholds, 100-percent affordable housing projects are assumed to have a less than significant impact on VMT. Since the project proposes only affordable housing, with one manager's unit to serve the affordable housing, the impact from generation of VMT would be less than significant consistent with OPR guidance.

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

Construction
A maximum of 30 workers would be required for the project construction at any given time. Approximately 160 truck trips from construction equipment and vehicles would occur during construction. Trucks would access the site from Highway 1 to Mesa Road and enter the site on Commodore Webster Road. No new construction of roads or other transportation facilities are proposed. Access to the project site would result in increased truck traffic on Highway 1 in front of West Marin Elementary School. Increased heavy truck traffic on Highway 1 during elementary school drop off or pickup times could result in increased hazards for students attending the elementary school, which would be a significant impact. Mitigation Measure TRA-1 requires coordination with the local elementary school and timing truck deliveries to avoid travel on Highway 1 in front of West Marin Elementary School during drop-off and pickup times. With implementation of Mitigation Measure TRA-1, impacts from increased traffic hazards would be less than significant with mitigation.

Operation/Occupancy
The project would use existing roads, including Commodore Webster Road, for access and would not modify or construct any new roads. Therefore, the project would not introduce any safety hazards and the impact would be less than significant.

d) Would the Project result in inadequate emergency access?

Emergency vehicles would enter the project site through Commodore Webster Drive from Mesa Road. All project driveways and access points would comply with County fire safety standards to maximize entry and egress space for emergency vehicles. A hammerhead turnaround for fire apparatus would be provided north of Building 50, and a cul-de-sac turnaround would be provided at the terminus of Commodore Webster Road, at the northern edge of the project site.

Because the project would comply with County requirements for emergency access, the impact on emergency access would be less than significant impact.

Mitigation Measures

Mitigation Measure TRA-1: Traffic Management Plan
Prior to initiation of construction, the Project contractor(s) shall use a qualified traffic engineer to prepare a Traffic Management Plan (TMP) in compliance with the California Manual on Uniform Traffic Control Devices. The TMP shall be incorporated into the contract documents and specifications. The TMP shall include, but not necessarily be limited to, the elements listed below:

- The construction contractor shall confirm with the West Marin Elementary School the typical start and dismissal times, school events, and irregular start and dismissal times prior to the start of construction.
- The construction contractor shall avoid hauling/truck traffic on Highway 1 in front of West Marin Elementary School within 1 hour prior to the start of school and 1 hour following dismissal or special event times or equivalent method to avoid traffic hazards at the elementary school as defined in the TMP.
- Installation of traffic-control devices where traffic conditions warrant, as specified in the applicable jurisdiction's standards (e.g., the California Manual on Uniform Traffic Control Devices Part 6: Temporary Traffic Control); use of flaggers, when warranted, to control vehicle movements.
- Implementation of a public information program to notify interested parties of the impending construction activities using means such as signs posted around the project site.
- Compliance with roadside safety protocols to reduce the risk of accidents.
- Maintaining of access for emergency vehicles at all times.
- Storage all equipment and materials in designated contractor staging areas on or adjacent to the worksite in such a manner as to avoid obstruction to traffic including emergency vehicles.

3.2.18 Tribal Cultural Resources

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

Environmental Setting

Tribal cultural resources (TCRs) are defined as sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either included or determined to be eligible for inclusion in the California Register of Historical Resources (California Register), included in a local register of historical resources, or a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant. A cultural landscape that meets these criteria is a tribal cultural resource to the extent that the landscape is geographically defined in terms of the size and scope of the landscape. Historical resources, unique archaeological resources, or non-unique archaeological resources may also be tribal cultural resources if they meet these criteria.

Sacred Lands Inventory and Tribal Research

The Native American Heritage Commission (NAHC) works to identify, catalog, and protect places of special religious or social significance, graves, and cemeteries of Native Americans per the authority given in PRC section 5097.9. The NAHC was contacted to provide a Sacred Lands File (SLF) search and provide a list of Native American tribes affiliated with the project region (Evans & de Shazo, Inc. 2023). The SLF inventory request was submitted to NAHC on August 2,

2023, to inquire about listed sacred sites located within or near to the project area and to obtain a list of local Native American tribes who may have additional information about sacred sites, TCRs, or other properties of traditional religious and cultural importance located within or near to the project area. The NAHC responded on August 12, 2023, with information that the record search was negative for the presence of any sacred sites for the project area.

AB 52 Consultation

On July 5, 2023, the County sent letters via email regarding the consultation opportunity for the project under AB 52 to all Native American individuals and organizations that the NAHC previously identified as having a traditional affiliation with Marin County and all others who requested to be consulted under AB 52. These letters included a project description, a project map, and contact information for appropriate County staff. Out of the groups contacted, FIGR responded and met with the County and archaeological consultants to consult on this project.

The County sent the initial notification of a consultation opportunity for this project to FIGR on July 5, 2023. On August 8, 2023, the County sent a follow-up notification via email to FIGR regarding the consultation opportunity for the project. On August 21, 2023, EDS Principal Archaeologist separately sent a letter to FIGR Chairman Greg Sarris, with the FIGR THPO in copy. On August 29, 2023, Ms. Evans sent an email to FIGR Cultural Resources Specialist Hector Garcia Cabrales to inquire about the availability of a tribal monitor to accompany the archaeologist during the field survey. Mr. Cabrales emailed Ms. Evans on September 1, 2023, to inform her that FIGR Tribal monitor Robin Meely was available for the field survey. Ms. Evans emailed Robin Meely on September 1, 2023, and provided information for the survey, such as when and where to meet, an aerial map and KMZ of the Project Area, and other details. Also, on September 1, 2023, Ms. Evans emailed Mr. Cabrales and provided the results of the NWIC record search, and she acknowledged receipt of the record search information. On September 5, 2023, Mr. Cabrales sent an email to Ms. Evans acknowledging receipt of the outreach letter sent to Mr. Sarris and the THPO on August 21, 2023. The email states that the project area is within the tribe's ancestral territory and there may be tribal cultural resource impacts. Accordingly, the tribe requested the results of the research efforts and recommendations be emailed to FIGR THPO Buffy McQuillen when available. On September 9, 2023, FIGR formally responded to the County regarding the AB 52 consultation notification and indicated that they were interested in consulting on the project. The results of the archaeological survey were provided to FIGR THPO Buffy McQuillen on October 16, 2023 by Ms. Evans, and a consultation meeting was held between FIGR and the County with Ms. Evans's participation on the same day, October 16, 2023.

To date, none of the other tribal organizations who were notified by the County regarding the AB 52 consultation opportunity have engaged in the consultation process. FIGR did not identify any TCRs within the project site during the consultation outreach process and no TCRs were identified during the archaeological field survey where a FIGR representative accompanied the archaeological staff in the field. However, this does not negate the potential for unidentified TCRs to be present within the project site.

Discussion

a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

Implementation of the proposed project would not impact any known listed or eligible TCR as no TCRs have been identified within the proposed project area. However, previously unidentified TCRs may be inadvertently discovered during ground-disturbing activities associated with the proposed project. If a TCR is encountered during construction, an impact on the TCR could occur. Mitigation Measure CUL-1 requires a professional archaeologist and a qualified tribal monitor to conduct cultural resources sensitivity training for workers, cessation of work within a 50-foot radius of any discovery of potential cultural resources (including TCRs), and that a FIGR representative evaluate the resource on site prior to any action being taken related to the discovery. The impact to undiscovered eligible TCRs would be less than significant with implementation of the mitigation measure.

Mitigation Measures

Mitigation Measure CUL-1 (see Section 3.2.5).

3.2.19 Utilities and Service Systems

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

Discussion

a) Would the Project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Water Service

The project is located within the NMWD service area. NMWD currently operates two groundwater supply wells on the project site. In June 2023, NMWD specified requirements for servicing water to the project site. NMWD's requirements direct that the Applicant shall enter into an agreement with the NMWD and execute financial arrangements for construction of a new groundwater facility prior to providing water service. NMWD also requires the following:

- NMWD would be given final building permit inspection hold for confirmation that all requirements of the project are satisfied.

- Occupancy approval shall not be granted until water service installation is complete and compliance with the Water Conservation requirements verified.
- As recycled water is to be used on premises that are served potable water, NMWD would require conformance with California requirements for design, construction, minimum separation from drinking water facilities, cross--connection control, and any other applicable regulation.
- Water service would not be furnished to any building unless it is connected to a public sewer system or to a wastewater disposal system approved by all government entities having regulatory jurisdictions.

Because NMWD's conditions include financial assurances for construction of a new groundwater well, the project could potentially result in construction of new water supply facilities. The project would only result in construction or relocation of water supply facilities if the proposed application of treated effluent effected NMWD's water supply wells. As discussed in Hydrology impact discussion b), Mitigation Measure HYDRO-1 specifies monitoring requirements and performance standards to avoid an impact on NMWD's water supply wells. Because the mitigation measure would be protective of water quality within NMWD's water supply wells on the project site, the project would not cause construction of new or relocated water supply facilities, and the impact would be less than significant with mitigation.

Wastewater Treatment Facility

Sewer service is not available in the project area. The project site currently contains below-ground tanks for limited on-site sewage collection and storage. When the property was used for USCG housing, wastewater was collected and transported to an offsite facility for disposal on a daily basis.

The project includes installation of a new wastewater treatment facility located on the project site, including a subsurface drip irrigation system and leach field. The wastewater treatment system would be located on the southwest edge of the project site, near the entrance on Commodore Webster Drive. The wastewater treatment system would consist of a Membrane Aerated Biofilm Reactor, which would be housed in a combination of underground tanks, aboveground container, treatment building, and storage tank.

SDE prepared a flow analysis memorandum that outlined the historical water usage at the site, the proposed program, and the projected wastewater flow for the maximum occupancy day. The proposed program was based on wastewater unit flow rates for each type of occupancy (residential, staff, visitors, meals). Approximately 8,600 gpd and 8,800 gpd of wastewater would be generated at the site under normal and full occupancy conditions, respectively (Sherwood Design Engineers 2022).

As a precautionary measure, the treatment and disposal systems would be sized for a 10,000 gpd daily flow, which represents a factor of safety of 1.1. A wastewater treatment capacity of 10,000 gpd would provide enough capacity for all residents and staff as well as up to 180 visitors. During large special events, when the number of visitors is anticipated to exceed 180,

portable toilets are proposed to be brought on site to manage additional sanitary waste and maintain wastewater flow at or below 10,000 gpd.

The primary mode of wastewater dispersal during the dry season would be through subsurface drip irrigation lines located throughout much of the project site. A leach field of 0.22 acre and a 10,000-gallon aboveground storage tank would be located adjacent the treatment system, south of Commodore Drive. The leach field is sized to dispose of 200 percent of the projected treated wastewater flow. The water treatment system would be connected to the proposed micro-grid and back up emergency generator to ensure consistent power supply.

To protect groundwater at the site and create a reliable supply of non-potable water for irrigation needs, the wastewater treatment system would be designed to meet the State's Recycled Water Standards, established in California Code of Regulations Title 22, for disinfected tertiary treatment. The treatment system would be designed to produce disinfected tertiary treated recycled water that meets the primary drinking water standard for nitrates, a pollutant of concern for groundwater. With tertiary treatment proposed for beneficial reuse, the San Francisco Bay Regional Water Quality Control Board (Regional Board) is the lead regulatory agency that would oversee and permit this project. As discussed in Hydrology impact discussion b), Mitigation Measure HYDRO-1 specifies monitoring requirements and performance standards to avoid an impact from the proposed wastewater treatment system on the site. With implementation of Mitigation Measure HYDRO-1, the impact from the wastewater treatment system would be less than significant with mitigation.

Stormwater

During construction, the project would comply with the statewide Phase II municipal stormwater NPDES permit requirements. The project would implement runoff reduction measures such as limiting clearing, grading, and soil compaction, minimizing impervious surfaces, conserving natural areas, complying with ESHA buffer requirements, and using a combination of LID and BMPs to improve the water quality of runoff from the site compared to existing conditions. With compliance with NPDES requirements, impacts would be less than significant during construction.

In accordance with the BASMAA Post-Construction Manual, the project is considered a regulated project because it creates or replaces more than 5,000 square feet of impervious surface. The project would utilize existing underground stormwater infrastructure where possible. Stormwater runoff would be intercepted and routed to six new bioretention facilities throughout the project site (see Figure 2.2-3). In addition, the existing mulched playground would be converted into a water retention area that would receive and contain runoff from the uphill site to allow for increased infiltration on site. As the project would increase on-site filtration through the removal of impervious surfaces and implementation of bioretention facilities, the project would not affect the capacity of the existing stormwater infrastructure. Impacts would be less than significant during operations.

Electricity and Natural Gas
Electricity to the project site is provided by PG&E. The proposed residential units would be all electric, and no gas appliances are proposed. The conversion of the project to all-electric use would require upgrades to the electrical infrastructure on site, but the existing underground PG&E powerlines would continue to be used.

Rooftop solar is proposed on all buildings, and two ground-mounted solar arrays are proposed along the east side of Commodore Webster Drive and on the hillside west of Buildings 101, 102, and 103 (see Figure 2.2-3). The proposed 558,000 kWh solar PV system has been sized to offset 100 percent of the projected energy consumption of the project, including the wastewater treatment plant and EV charging stations. The proposed system would serve as a microgrid (PV system, BESS, and emergency generator) that would allow the project to serve as a neighborhood-level resilience center to provide shelter and resources during extreme weather events and other emergencies. As the project would be self-sufficient, the project would not require the construction or relocation of new off-site facilities. Impacts would be less than significant.

Telecommunication
The existing telecommunication facilities at the site would remain. No improvements to telecommunication facilities are required or proposed. No impact on telecommunication facilities would occur.

b) Would the Project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

Construction
Potable water is provided by the NMWD. The NMWD maintains two existing potable water wells and an associated treatment facility on the project site. Water used during construction would be provided by the existing NMWD services. Water would be used during construction for dust suppression, concrete washout, and other miscellaneous activities. Dust suppression during construction would use approximately 1,000 gallons of water per day for a 120-day period, as needed. Other water uses, such as power washing buildings, would account for approximately 1,500 gallons per building. Adequate water supplies are available under existing and future conditions due to the very minimal volume of water that is required for construction and the short-term water use. Impacts would be less than significant.

Operations
The project has an anticipated water demand of 9,500 gpd. NMWD obtains its water supply for the West Marin service area from two wells located on the nearby Gallagher Ranch and from two wells located on the project site. According to the NWMD 2020 Urban Water Management Plan, the NWMD has adequate water supplies to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years (North Marin Water District

2021). Therefore, the NWMD has adequate capacity to serve the project. Impacts would be less than significant.

c) Would the Project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Refer to impact discussion a), above. The project would be served by a newly constructed wastewater treatment facility, subsurface drip irrigation system, and leach field. The wastewater system would accommodate up to 10,000 gallons of wastewater per day, which is adequate to serve the demands of the project. The proposed water treatment system would be completely contained on site and would have sufficient capacity to serve the proposed project. Accordingly, the proposed project would not affect an offsite wastewater treatment provider, and the proposed project would not impact wastewater treatment capacity of any wastewater treatment provider.

d) Does the Project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Recology Sonoma Marin provides waste services to Point Reyes Station. The nearest landfill is the Waste Management Redwood Landfill, located approximately 3.5 miles east of the project site.

Construction

The project construction would reuse excavated soils on site, with a small volume of net import of fill material. Construction of the project would generate small volumes of construction waste (e.g., equipment packaging, trash generated by workers). The small quantity of waste generated during project construction would not be in excess of the capacity of nearby landfills. Adequate capacity is available to accommodate the disposal of materials associated with the project. The project would comply with the Marin County Climate Action Plan 2030, including WR-C3 Construction & Demolition Debris and Self-Haul Waste, which requires all loads of construction and demolition debris and self-haul waste to be processed for recovery of materials as feasible. With compliance with WR-C3, impacts would be less than significant.

Operations

The project would consist of 54 affordable housing units within the 12 existing buildings, which equates to approximately 215 residents. In 2019, each California resident disposed on average 6.7 pounds of waste per day (CalRecycle 2020). Accordingly, the project is expected to produce approximately 1,440 pounds per day of waste.

Occupancy of the low-density residential parcels would not generate enough waste to change capacity projections at a landfill. Sufficient landfill capacity exists to address regular domestic waste production from the 54 additional housing units. Impacts would be less than significant.

e) Does the Project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Construction

Refer to impact discussion d), above. Project construction activities would generate debris that needs to be disposed of, such as equipment packaging and trash generated by workers. The waste material generated during project construction as well as maintenance debris would be transported to an appropriate disposal location in accordance with federal, State, and local statutes and regulations related to solid waste. Any removed vegetation would be chipped on site or composted. With compliance with existing regulations, impacts would be less than significant.

Operations/Occupancy

Operation and occupancy of the project site would generate trash and waste typical of a residential use. The project would include receptacles for separation of recycling, compost, and trash to comply with federal, State, and local regulations for management of waste. Because the project would comply with regulations for management of waste, the impact would be less than significant.

Mitigation Measures

Mitigation Measure HYDRO-1 (refer to Section 3.2.10).

3.2.20 Wildfire

Environmental Impacts	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
20. WILDFIRE. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	☒
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	☒
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒

.

Environmental Setting

The project site is located in a Moderate Hazard Severity Zone according to the California Department of Forestry and Fire Protection (CAL FIRE), as shown in Figure 3.2-3. No state responsibility areas or lands classified as very high fire hazard severity zones are located near the project site.

Discussion

Because the project is not located in or near a state responsibility area or lands classified as very high fire hazard severity, no impact from being located in a state responsibility area or lands classified as very high fire hazard severity would occur. Impacts from wildfire are addressed in Section 3.2.9, impact discussion g).

Mitigation Measures

None required.

3.2.21 Mandatory Findings of Significance

Environmental Impacts	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
21. MANDATORY FINDINGS OF SIGNIFICANCE:				
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☒	☐	☐
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☐	☒	☐	☐
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☒	☐

Discussion

a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

As described in Section 3.2.4 Biological Resources, the project has implemented buffers from ESHA and would avoid impacts on sensitive habitat areas for fish and wildlife species. No special status plants occur within the project area based on the results of focused surveys; therefore, the project would have no impact on special status plants. The following rare and endangered wildlife species have the potential to occur within the project area: CCC steelhead, CCC coho salmon, Tomales roach, California freshwater shrimp, monarch butterflies, western pond turtle, pallid bat, Townsend's big-eared bat, and American badger.

CCC steelhead, CCC coho salmon, Tomales roach, and California freshwater shrimp have the potential to occur within Lagunitas Creek within the project area. Although the project would avoid direct impacts, the project has the potential to result in indirect water quality impacts during construction due to leaking fuel or hydraulic lines on heavy equipment, improper fuel handling practices, spills during refueling or lubrication operations, and sediment runoff from clearing and grading. Earthmoving and other actions that would disturb soils and generate construction debris could also increase turbidity and sedimentation. Compliance with the Construction Stormwater General Permit and other design features would avoid significant impacts on CCC steelhead, CCC coho salmon, Tomales roach, and California freshwater shrimp, and the resulting indirect impact would be less than significant.

The removal of 19 mature eucalyptus trees could result in direct impacts to monarch butterflies. Mitigation Measure BIO-1 requires removal of eucalyptus trees outside of the roosting period for monarch butterflies to avoid the potential for impacts on a roost of monarch butterflies. The majority of the project area is located within suitable upland habitat for CRLF. Although the project would remove 2,152 square feet of existing facilities from upland areas within ESHA and adjacent the riparian corridor, which would provide a long-term benefit to water quality and habitat, potential impacts to CRLF may still occur. Implementation of Mitigation Measures BIO-2 through BIO-13 would reduce impacts to CRLF as the mitigation requires a USFWS-approved biologist to conduct pre-construction clearance surveys, biological monitoring by a designated biologist or their designee during ground-disturbing activities, installation of temporary exclusion fencing to prevent CRLF dispersal into the work area during construction, worker environmental training, construction avoidance periods after rain events, and covers for open excavations. Should the species occur on the site during construction, the mitigation measures also define procedures for safe disposition of CRLF.

Lagunitas Creek provides perennial aquatic habitat for western pond turtle. While upland nesting is unlikely in the disturbance area, the presence of western pond turtle cannot be ruled out given the proximity to Lagunitas Creek and riparian habitat. Implementation of Mitigation Measures BIO-2, BIO-3, BIO-6, and BIO-10 include procedures for worker training, installation of exclusion fencing that would effectively avoid entry of western pond turtle into the project area, biological monitoring during construction, and covering of trenches to avoid a western pond turtle from entering any trench.

Special status bat species, pallid bat and Townsend's big-eared bat, have the potential to roost within the existing buildings. Marin Development Code section 22.20.040.F defines procedures for pre-construction surveys and protection of active bat roosts during construction and demolition activities during the bat roosting season. Because bats and active roosts would be protected with implementation of Marin Development Code section 22.20.040.F, the impact on special-status bats from project construction and demolition activities would be less than significant.

.

Remnant American badger burrows were observed within open grassland areas within the project site, and American badgers are assumed to be present within grassland areas in the project site. The project would install solar panels and potentially require trenching of electrical conduit in grassland areas. The wastewater treatment facility would also be located in grasslands. Mitigation Measure BIO-15 requires protections for American badger, including pre-construction surveys and buffers from any active burrows of American badger.

White-tailed kite, yellow warbler, and other bird species protected by the MBTA have the potential to use the vegetation and trees within the project area as nesting habitat. Removal of trees with an active nest of special status bird species would cause destruction of the nest and eggs, which would be a significant impact. In addition, the project construction would involve the use of heavy equipment that would produce noise in proximity to suitable habitat for special status birds and other birds protected by the MBTA. Marin Development Code section 22.20.040.G limits tree/vegetation removal and initial ground disturbance activities occur outside of the active nesting season (i.e., February 1 to August 15) when feasible, pre-construction surveys for birds in any vegetation removed during the nesting season, and avoidance procedures for active nests including buffers from active nesting habitat. Mitigation Measure BIO-14 defines enhanced buffers for special-status bird species.

Mitigation Measures BIO-1 through BIO-15 have been identified to reduce impacts on fish and wildlife species to less-than-significant levels. With implementation of Mitigation Measures BIO-1 through BIO-15, the project would not cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or substantially reduce the number or restrict the range of a rare or endangered plant or animal, and the impact would be less than significant with implementation of mitigation.

No important examples of California history or prehistory are known to occur within the project site, as discussed in Section 3.2.5. While there are no known examples of major periods of California history or prehistory in the project area, there is the potential to discover resources during construction. In the event that historical resources are uncovered during project-related ground disturbing activities, compliance with Marin Development Code section 22.20.040.E is required. Under Marin Development Code section 22.20.040.E, if archaeological materials (including historical and pre-historical materials) are discovered during construction, construction activities shall cease and the remains shall be recorded by a qualified archaeologist and treated according to state law. Through compliance with Marin Development Code, the project would not eliminate an important example of California history or prehistory, and the impact would be less than significant.

b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

The CEQA Guidelines (Section 15130) require a discussion of the cumulative impacts of a project. There are generally two accepted methods of evaluating cumulative impacts: the plan method and the list method. These two approaches are included as part of Section 15130 and state that a cumulative impact analysis must include either 1) a list of past, present, and probable future projects that may contribute to the effects of the project, or 2) a summary of projections contained in an adopted local, regional, or statewide plan, or related planning document that describe or evaluate contributions to a cumulative effect.

The project is located in a developed residential neighborhood in the county. The project site is bounded by the Point Reyes Affordable Homes to the west, an undeveloped lot to the north, and Lagunitas Creek to the east and south. Since the surrounding areas are currently developed and there are no proposed projects in the project vicinity, the plan method is more appropriate to analyze potential cumulative impacts from project implementation.

The proposed project would have no effect on agricultural and forestry resources, mineral resources, or wildfire and would not contribute to cumulative impacts on these resources. The project impacts on aesthetic resources would be highly localized as the project is not visible to surrounding areas, and the impacts would not be cumulatively considerable. The project would be consistent with the Climate Action Plan and all policies for reduction of GHG emissions, including use of renewable energy and conversion of the facility to all electric power, and would not contribute considerably to cumulative GHG emissions or energy impacts. The project area of effect does not contain any known historic, archaeological, or tribal cultural resources; therefore, the project would not contribute considerably to cumulative impacts on historic and archaeological resources or tribal cultural resources. The project impacts on geology and soils would be localized to the project site and would not contribute to cumulative impacts on geology and soils. The project impact on hazards and hazardous materials from lead-based paint and asbestos containing materials in the existing buildings would be localized to the project site and would not contribute to cumulative impacts on hazards and hazardous materials. The project's less-than-significant impact on noise would be localized to the project site and would not contribute to any cumulative impact on noise. The project's less-than-significant impact on population and housing would not contribute to any cumulatively significant impact on population and housing. The project would be consistent with the LCP as described in the land use section and would not contribute to any cumulative impacts on land use. The project would not generate the need for new recreational resources and would not increase use of recreational facilities and would therefore not contribute to cumulative impacts on recreation. The remaining potential cumulative impacts are discussed below.

Air Quality
The project could have a cumulatively considerable impact on air quality if it either 1) resulted in emissions above the significance thresholds or 2) violated any action in an attainment plan. BAAQMD thresholds for ozone precursor pollutants (ROGs and NO_X) and particulate matter (PM_{10} and $PM_{2.5}$) are the thresholds at which a project would be considered to constitute a cumulatively considerable net increase of any criteria pollutant for which the region is non-attainment. Marin County is within the San Francisco Bay Area Air Basin. The Bay Area Air Quality Management District (BAAQMD) is responsible for air quality management and regulates activities that may affect air quality within the Bay Area Air Basin. As summarized in Table 3.2-3, the project would be consistent with all applicable air quality control measures contained in the Bay Area Clean Air Plan, and the project would not conflict with or obstruct implementation of the plan. The average daily construction and operational emissions presented in Table 3.2-4 are below BAAQMD's significance thresholds. Because the project would not exceed any thresholds established for evaluating cumulative impacts on air quality, the projects contribution to cumulative air quality impacts would be less than significant.

Biological Resources
The project could result in localized temporary construction impacts on special status species and migratory birds. Mitigation measures would be implemented to reduce the impacts on special status species so that the localized and temporary impacts of construction would not result in a cumulatively considerable impact on any special status species, and the cumulative impact would be less than significant with the project mitigation included in Section 3.2.4.

Hydrology and Water Quality
The project's potential impacts on groundwater supply are specific to the project and not a cumulative impact. Impacts from sedimentation in Lagunitas Creek is a cumulative impact that is addressed through the TMDL. The project would not conflict with implementation of the TMDL, and the project construction would include implementation of BMPs consistent with the Construction Stormwater General Permit. With implementation of stormwater and erosion control BMPs and installation of the bioretention basins for long-term stormwater management, the project's contribution to a cumulatively significant impact on sedimentation in Lagunitas Creek would be less than significant.

Public Services and Utilities and Service Systems
No cumulative projects are proposed in the project vicinity. While the project would reintroduce residents to the project area, the additional residents would not create a significant cumulative impact on public services as no other projects are proposed in the area that would contribute to a cumulative impact on public services or utilities and service systems.

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

This IS/MND identifies potentially significant impacts related to Air Quality, Biological Resources, Cultural Resources, Geology and Soils, Hazards and Hazardous Materials,

Hydrology and Water Quality, Transportation, Tribal Cultural Resources, and Utilities and Service Systems. Mitigation measures have been identified in the resource impact discussions of this IS/MND to reduce all potentially significant impacts to a less-than-significant level. Impact determinations of "no impact" or "less-than-significant impact" were made for the following environmental issues: Aesthetics, Agriculture and Forestry Resources, Energy, Greenhouse Gases, Land Use and Planning, Mineral Resources, Noise, Population and Housing, Public Services, Recreation, and Wildfire. Repurposing of the existing housing units at the project site would have a beneficial impact on human beings by creating new housing units that would address regional issues of homelessness. As discussed in Hydrology and Water Quality, the wastewater treatment system would produce very high quality of effluent, and the system would be subject to monitoring in compliance with State of California requirements and permits that would ensure the effluent would not adversely affect humans. The project would not result in substantial adverse direct or indirect effects on any human beings.

Mitigation Measures

Mitigation Measures BIO-1 through BIO-15 (see Section 3.2.4)

4 List of Preparers

4.1 Marin County

Rachel Reid, Environmental Coordinator

Tammy Taylor, Senior Environmental Planner

Robin Fies, Environmental Planning Technician and Staff Archaeologist

Michelle Levenson, Principal Planner

Leelee Thomas, Deputy Director of Housing and Federal Grants

Aline Tanielian, Affordable Housing Planner

4.2 Consultants

Name, Title, Firm	Role
Susanne Heim, Principal, Panorama Environmental	Quality Assurance/Quality Control, Hydrology and Water Quality
Regina Ochoa, Senior Planner, Panorama Environmental	Aesthetics, Agricultural and Forestry Resources, Greenhouse Gases, Land Use and Planning, Population and Housing, Public Services, Recreation, Transportation
Garett Peterson, Environmental Planner III, Panorama Environmental	Cultural Resources, Energy, Geology and Soils, Hazards and Hazardous Materials, Mineral Resources, Noise, Tribal Cultural Resources, Utilities and Service Systems, Mandatory Findings of Significance
Rachel Durben, Senior Biologist	Biological Resources and Hydrology
Jennifer Kidson, Senior Planner	Air Quality (CalEEMod)
Sally Evans, Archaeologist, Evans DeShazo	Cultural Resources and Tribal Cultural Resources
Gretchen Boyce, Historian, Groundwork Preservation	Cultural Resources

4 LIST OF PREPARERS

This page is intentionally blank.

5 References

Bay Area Air Quality Management District (BAAQMD). 2017a. "Air Quality Standards and Attainment Status." January 5, 2017. https://www.baaqmd.gov/about-air-quality/research-and-data/air-quality-standards-and-attainment-status.

———. 2017b. "Spare the Air: A Blueprint for Clean Air and Climate Protection in the Bay Area." https://www.baaqmd.gov/~/media/files/planning-and-research/plans/2017-clean-air-plan/attachment-a_-proposed-final-cap-vol-1-pdf.pdf?rev=8c588738a4fb455b9cabb27360409529&sc_lang=en.

———. 2022. "California Environmental Quality Act Air Quality Guidelines." Available: https://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/updated-ceqa-guidelines.

Bay Area Open Space Council. 2011a. "Bay Area Cities GIS Dataset." San Francisco Bay Area Upland Habitat Goals Project. GreenInfo Network, May.

———. 2011b. "Bay Area Counties GIS Dataset."

———. 2011c. "Bay Area Streets Geodatabase Feature Class."

California Air Resources Board (CARB). n.d. "Zero-Emission Appliances - Frequently Asked Questions (FAQs)." Accessed December 3, 2023. https://ww2.arb.ca.gov/our-work/programs/building-decarbonization/zero-emission-appliance-standards/faq.

California Department of Conservation (CDOC). 2016. "California Important Farmland: Most Recent Mapping." Map service. Vector digital data. "Marin USGS Point Reyes" created by Panorama Environmental, Inc. (12/2/2023): Using Arc GIS (12/2/2023). https://cadoc.maps.arcgis.com/home/item.html?id=99a6a743fb0241efab22f0b19668b4ba.

———. n.d. "Important Farmland Categories." Accessed December 2, 2023. https://www.conservation.ca.gov/dlrp/fmmp/Pages/Important-Farmland-Categories.aspx.

California Department of Education. 2023. "School Profile: West Marin Elementary." 2023. https://www.cde.ca.gov/sdprofile/details.aspx?cds=21733616024954.

California Department of Fish and Wildlife (CDFW). 2023a. "California Natural Community List." California Department of Fish and Wildlife (CDFW). https://www.wildlife.ca.gov/Data/VegCAMP/Natural-Communities.

———. 2023b. "California Natural Community Conservation Planss." Map of Plan Areas. California Department of Fish and Wildlife (CDFW). Available: https://www.wildlife.ca.gov/Conservation/Planning/NCCP.

———. 2023c. "California Natural Diversity Database." "USCG Marin CNDDB 5-miles" table and "Marin USCG CNDDB" generated by Panorama, Inc.: Using: Arc GIS (10/31/2023). https://wildlife.ca.gov/Data/CNDDB.

California Department of Forestry and Fire Protection, Fire and Resource Assessment Program (FRAP). 2023. "Fire Hazard Severity Zones in State Responsibility Area." Map Service.

"Fire Hazard Severity Zone" Created by Panorama Environmental, Inc.: Using Arc GIs (11/23/2023). https://egis.fire.ca.gov/arcgis/rest/services/FRAP/FHSZ/MapServer/1.

California Department of Parks and Recreation. 1976. *California Inventory of Historic Resources*. Department of Parks and Recreation.

California Department of Water Resources (DWR). 2015. "i08_B118_CA_GroundwaterBasins." Map Server. Feature Class. "Marin USGS Point Reyes Station Groundwater Basins" created by Panorama Environmental, Inc: Using ArcGIS (12/3/2023). https://gis.water.ca.gov/arcgis/rest/services/Geoscientific/i08_B118_CA_GroundwaterBasins/MapServer.

California Energy Commission (CEC). 2022. "CalEHP Guiding Principles First Edition." Available: https://www.energy.ca.gov/publications/2022/california-electric-homes-program-calehp-first-edition-assembly-bill-137-2021.

California Environmental Protection Agency (CalEPA). 2015. "Preliminary Endangerment Assessment Guidance Manual." https://dtsc.ca.gov/wp-content/uploads/sites/31/2023/06/PEA_Guidance_Manual.pdf.

———. 2022. "UPAAG Strategic Plan 2022–2027." https://calepa.ca.gov/wp-content/uploads/sites/6/2022/09/UPAAG-Strategic-Plan-2022.pdf.

California Protected Areas Database. 2023. "Parks GIS Dataset."

California State Water Resources Control Board (SWRCB). 2010. "San Francisco Bay Basin Water Quality Control Plan, Basin Plan Update, Addition of Water Bodies and Beneficial Uses: Attachment a Surface Water Body Beneficial Uses Documentation Tables." Available: https://www.waterboards.ca.gov/sanfranciscobay/basin_planning.html.

———. 2022. "NPDES 2022 Construction Stormwater General Permit." California Water Boards, State Water Resources Control Board. 2022. https://www.waterboards.ca.gov/water_issues/programs/stormwater/construction/general_permit_reissuance.html.

———. n.d. "GeoTracker." Data Portal. Accessed October 8, 2023. https://geotracker.waterboards.ca.gov/.

CalOES Seismic Hazards Branch: Earthquake and Tsunami Program. 2022. "Marin County Tsunami Inundation Zone." Feature Service. Shapefile. Produced by the California Geological Survey and the California Governor's Office of Emergency Services. "Marin USGS Point Reyes Station Tsunami Inundation Zone" created by Panorama Enviromental, Inc. Using using Arc GIS Online (12/2/2023). https://marincounty.maps.arcgis.com/home/item.html?id=5e021708501e43119c49d4c3eeb6fe7c.

CalRecycle. 2020. "California's 2019 Per Capita Disposal Rate Estimate." https://calrecycle.ca.gov/lgcentral/goalmeasure/disposalrate/mostrecent/.

Caltrans. 2013. "Technical Noise Supplement to the Caltrans Traffic Noise Analysis Protocol." Reference & Guidance CT-HWANP-RT-13-069.25.2.

———. 2019. "List of Eligible and Officially Designated State Scenic Highways."

———. 2020. "Transportation and Construction Vibration Guidance Manual." Guidance CT-HWANP-RT-20-365.01.01. https://dot.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/env/tcvgm-apr2020-a11y.pdf.

5 REFERENCES

County of Marin. 1994. "Marin County Environmental Impact Review Guidelines." https://www.marincounty.org/-/media/files/departments/cd/planning/environmental-impact/erguide1994.pdf.

———. 2007. "Marin Countywide Plan." https://www.marincounty.org/-/media/files/departments/cd/planning/currentplanning/publications/county-wide-plan/cwp_2015_update_r.pdf?la=en.

———. 2017. "Point Reyes Area Marin Mutual Threat Zone Plan." Map. Wildfire Evacuation Zones. Available: https://www.marincounty.org/-/media/files/departments/fr/wildfire-evacuation-zones/mtz_point-reyes.pdf.

———. 2019a. "Marin County Local Coastal Program Land Use Plan." https://www.marincounty.org/-/media/files/departments/cd/planning/local-coastal/newdocs/lcp-edits_land-use-plan_102023.pdf?la=en.

———. 2019b. "Marin County Local Coastal Program Land Use Plan." Land Use Plan. Marin County: Certified by the California Coastal Commission. Available: https://www.marincounty.org/depts/cd/divisions/planning/plans-policies-and-regulations/local-coastal-program.

———. 2020a. "Drawdown: Marin Strategic Plan." Available: https://www.marincounty.org/depts/cd/divisions/sustainability/climate-and-adaptation/marincan/strategic-plan.

———. 2020b. "Marin County Unincorporated Area Climate Action Plan 2030." County of Marin Community Development Agency.

———. n.d. "MarinCAN." MarinCAN. Accessed December 3, 2023. https://www.marincounty.org/depts/cd/divisions/sustainability/climate-and-adaptation/marincan.

ESRI. 2011. "Terrain: Multi-Directional Hillshade."

Essel Environmental Engineering & Consulting. 2021. "Phase 1 ESA."

Evans & de Shazo, Inc. 2023. "Archaeological Study for the Proposed United States Coast Guard (USGS) Housing Facility Redevelopment Project, 100 & 206 Commodore Webster Drive, Point Reyes Station, Marin County, California." Prepared for Panorama Environmental, Inc.

Evans, Shazo, and Inc. 2023. "Archaelogical Study for the Proposed USCG Housing Facility Redevelopment Facility."

Federal Emergency Management Agency (FEMA). n.d. "National Flood Hazard Layer." Geospatial data. "FEMA Floodway" created by Panorama Environmental, Inc.: Using Arg GIS (10/6/2023). https://www.fema.gov/flood-maps/national-flood-hazard-layer.

Federal Transit Administration (FTA). 2018. "Transit Noise and Vibration Impact Assessment Manual." FTA Report No. 0123. Available: https://www.transit.dot.gov/research-innovation/transit-noise-and-vibration-impact-assessment-manual-report-0123.

Governor's Office of Planning and Research (OPR). 2018. "Technical Advisory on Evaluating Transportation Impacts in CEQA." State of California. https://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf.

Griffiths, Jessica, and Francis Villablanca. 2015. "Managing Monarach Butterfly Overwintering Groves: Making Room Among the Eucalyptus." *California Fish and Game* 101 (1): 40–50.

5 REFERENCES

Groundwork Planning & Preservation. 2023. "Historic Resource Assessment."

"Item 5." 2014. Available: https://www.waterboards.ca.gov/sanfranciscobay/water_issues/programs/TMDLs/lagunitascrksedimenttmdl.html.

"L2.00_TREE PLANTING PLAN-Annotated Set (2).Pdf." n.d.

Marin County Community Development Agency. 2023. "Zoning of Unincorporated Marin County vector digital data."

Marin County Sheriff's Office of Emergency Services. 2014. "Marin Operational Area Emergency Operations Plan."

———. 2018. "Marin County Multi Jurisdictional Local Hazard Mitigation Plan." \.

Marin Map and VarGIS. 2023. "Building Footprints GIS data."

Maxar. 2021. "Aerial Imagery."

Miller, Heather, and Janene Caywood. 2008. "National Register of Historic Places Nomination Form for the Olema Valley/Lagunitas Loop Ranches Historic District (P-21-002919)." Record on file at the Northwest Information Center, Rohnert Park, California.

National Marine Fisheries Service (NMFS). 2021. "Essential Fish Habitat (EFH)." Shapefile. Geospatial data. "Marin Point Reyes Map and Report" generated by Panorama Environmental, Inc.: Using: Essential Fish Habitat Mapper: https://www.habitat.noaa.gov/apps/efhmapper/ (11/8/2023). Latest data update: 03/10/2021. https://www.habitat.noaa.gov/application/efhinventory/index.html.

———. 2022. "NMFS ESA Critical Habitat." Geodatabase. Using Protected Resources App (https://www.fisheries.noaa.gov/resource/map/protected-resources-app (11/8/2023). https://noaa.maps.arcgis.com/home/item.html?id=f66c1e33f91d480db7d1b1c1336223c3.

North Marin Water District. 2021. "Urban Water Management Plan." https://nmwd.com/wp-content/uploads/2021/07/NMWD-UWMP-2020_without_appendices.pdf.

Office Historic Preservation (OHP). 2012. "Archaeological Resource Directory (Formerly the Determination of Eligibility List) for Marin County."

———. n.d. "Marin." California Historical Landmarks By County. Accessed December 2, 2023. https://www.parks.ca.gov/.

Office of Historic Preservation (OHP). 1988. *Five Views: An Ethnic Historic Site Survey for California*. https://www.nps.gov/parkhistory/online_books/5views/5views.htm.

———. 2020. "Built Environment Resource Directory (BERD) Marin County." CSV. Data table. Available: https://ohp.parks.ca.gov/?page_id=30338.

———. n.d. "California Historical Resources." Database. Accessed December 2, 2023. https://www.parks.ca.gov/.

Questa Engineering Corp. 2023. "Groundwater and Soils Investigation for Onsite Wastewater Facilities Former U.S. Coast Guard Site Point Reyes Station Marin County, California." California: Coast Guard Site Point Reyes Station Marin County.

Rockridge Geotechnical. 2022. "Geotechnical Investigation."

Schultz, Erica, and Matthew Davis. 2017. "National Register of Historic Places Registration Form for the Olema Valley Dairy Ranches Historic District." Architectural Resources Group, San Francisco, California. Record on file at the Northwest Information Center, Rohnert Park, California.

5 REFERENCES

Sherwood Design Engineers. 2022. "Point Reyes Coast Guard Housing Site Redevelopment Onsite Wastewater Basis of Design Report." Basis of Design Report.

Siegal & Strain Architects. 2023. "Point Reyes Housing Renewal Construction Schematic."

Soil Survey Staff, Natural Resources Conservation Service, United States Department of Agriculture. n.d. "Web Soil Survey." Map viewer. Available: https://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx.

State Water Resources Control Board. 2016. "Order WQ 2016-0068-DDW Water Reclamation Requirements for REcycled Water Use."

Tetra Tech. 2016. "Environmental Compliance Due Diligence Activities Report."

U.C. Museum of Paleontology. n.d. "U.C. Museum of Paleontology Specimens." Accessed February 15, 2024. https://ucmpdb.berkeley.edu/cgi/ucmp_query2?admin=&table=ucmp2&where-loc_ID_num=2439-.

United States Geological Survey (USGS). 2012. "National Hydrography Dataset."

U.S. Environmental Protection Agency (EPA). 2023a. "NAAQS Table." Other Policies and Guidance. https://www.epa.gov/criteria-air-pollutants/naaqs-table.

———. 2023b. "Delineate the Source Water Protection Area." Overviews and Factsheets. July 15, 2023. https://www.epa.gov/sourcewaterprotection/delineate-source-water-protection-area.

U.S. Fish and Wildlife Service (USFWS). 2023. "iPaC Resource List." PDF. "Official Species List" provided to Panorama Environmental, Inc., by Sacramento Fish and Wildlife Office: Using: IPaC (https://ipac.ecosphere.fws.gov/). https://ipac.ecosphere.fws.gov/.

WRA, Inc. 2023. "Biological Site Assessment Report: U.S. Coast Guard Housing Facility Redevelopment Project, Point Reyes Station, Marin County, California."

This page is intentionally blank.

6 PROJECT SPONSOR'S INCORPORATION OF MITIGATION MEASURES

Acting on behalf of the project sponsor or the authorized agent of the project sponsor, I (undersigned) have reviewed the Initial Study for the Point Reyes Station USCG Coastal Permit and Conditional Use Permit and have particularly reviewed the mitigation measures and monitoring programs identified herein. I accept the findings of the Initial Study, including the recommended mitigation measures, and hereby agree to modify the proposed project applications now on file with Marin County to include and incorporate all mitigation measures and monitoring programs set out in this Initial Study.

Corey Ohama

(Project Sponsor's Name or Representative)

Aruna Doddapaneni

(Project Sponsor's Name or Representative)

COhama — 4-15-2024

(Project Sponsor's signature) — Date

A D — 4/17/2024

(Project Sponsor's signature) — Date

This page is intentionally blank.

7 Environmental Determination

(Completed by Marin County Environmental Planning Manager). Pursuant to Sections 15081 and 15070 of the State Guidelines, the forgoing Initial Study evaluation, and the entire administrative record for the Project:

I find that the Project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared. ☐

I find that although the Project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared. ☒

I find that the Project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required. ☐

I find that the Project MAY have a "potentially significant impact" or "potentially significant impact unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed. ☐

I find that although the project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the project, nothing further is required. ☐

Rachel Reid	Environmental Planning Manager	April 18, 2024
Signature	Name/Title	Date

This page is intentionally blank.