
**INITIAL STUDY/ MITIGATED NEGATIVE DECLARATION FOR THE
PROPOSED NOVATO UNIFIED SCHOOL DISTRICT GROUNDS
MAINTENANCE AND OPERATIONS BUILDING**

Prepared for:

Novato Unified School District
1015 Seventh Street
Novato, CA 94945

Prepared by:

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June 20, 2019

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ACRONYMS AND ABBREVIATIONS

Acronym/Abbreviation	Definition
ADWF	average dry weather flow
APE	Area of Potential Effect
BAAQMD	Bay Area Air Quality Management District
BMP	Best Management Practice
CARB	California Air Resources Board
DPR	California Department of Parks and Recreation
FEMA	Federal Emergency Management Agency
HPD	Historic Property Directory
CO	carbon monoxide
CO ₂ E	carbon dioxide equivalent
GHG	greenhouse gas
gpd	gallons of wastewater per day
LOS	level of service
MCFCWCD	Marin County Flood Control and Water Conservation District
MCSTOPPP	Marin County Stormwater Pollution Prevention Program
mgd	million gallons per day
MLD	Most Likely Descendant
NAHC	Native American Heritage Commission
NFPD	Novato Fire Protection District
NO _x	nitrogen oxides
NPD	Novato Police Department
NPDES	National Pollutant Discharge Elimination System
NWIC	Northwest Information Center
OHP	State Office of Historic Preservation
O ₃	ozone
PM ₁₀	particulate matter less than 10 microns
PM _{2.5}	particulate matter less than 2.5 microns
RWQCB	Regional Water Quality Control Board
SCH	State Clearinghouse
SFBAAB	San Francisco Bay Area Air Basin
SFBRWQCB	San Francisco Bay Regional Water Quality Control Board
SLF	Sacred Lands File
SO _x	sulfur dioxide
SWPPP	Stormwater Pollution Prevention Plan
TAC	toxic air contaminant
TMDL	Total Maximum Daily Load
UCMP	University of California Museum of Paleontology
VOC	volatile organic compound
WWTP	Wastewater Treatment Plant

ENVIRONMENTAL DETERMINATION

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

DETERMINATION: On the basis of this initial evaluation:

I find that the proposed Project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.	
I find that although the proposed 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.	X
I find that the proposed Project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.	
I find that the proposed Project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.	
I find that although the proposed Project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed Project, nothing further is required.	

Michael Woolard, NUSD

Date

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I. INTRODUCTION

This Initial Study/Mitigated Negative Declaration (IS/MND) has been prepared by the Novato Unified School District (NUSD or District), 1015 Seventh Street, Novato, CA 94945, pursuant to the California Environmental Quality Act (Public Resources Code Sections 21000 et seq.), CEQA Guidelines (Title 14, Section 15000 et seq. of the California Code of Regulations). It provides documentation to support the conclusion that the proposed Grounds Maintenance and Operations Building (“the Project”), with mitigation identified herein, would not cause a potentially significant impact to the physical environment. The proposed site is located in the former Hamilton Air Force Base area, in the City of Novato, in Marin County.

This IS/MND describes the location of the Project site, the Project sponsor’s objectives, and the details of the proposed Project. The Environmental Checklist Form included as Appendix G of the CEQA Guidelines serves as the basis for the environmental evaluation contained in the IS/MND. The Checklist Form examines the specific potential Project-level physical environmental impacts that may result from the construction and operation of the proposed new and expanded facilities onsite. Mitigation measures have been identified to reduce any potentially significant impacts that would otherwise occur with development and operation of the new facilities to a less-than-significant level.

The District will serve as the “lead agency” (the public agency that has the principal responsibility for carrying out and/or approving a Project) for the proposed Project. The governing board of the District is responsible for ensuring that the environmental review and documentation meet the requirements of CEQA. The draft IS/MND is subject to review and comment by responsible agencies and the public during a statutory public review period (30 days). Any necessary revisions will be incorporated in the Final IS/MND.

Should the District approve the Project, it will be required to file a “Notice of Determination” for posting by the County Clerk and the State Clearinghouse. The filing of the notice and its posting starts a 30-day statute of limitations on court challenges to the CEQA review of the Project.

Organization of the IS

This document is organized into the following sections:

SECTION I – INTRODUCTION: Provides background information about the Project name, location, sponsor, and the date this Initial Study was completed.

SECTION II – PROJECT DESCRIPTION: Includes a Project background and detailed description of the proposed Project.

SECTION III – INITIAL STUDY CHECKLIST AND DISCUSSION: Reviews the proposed Project and states whether the Project would have potentially significant environmental effects.

SECTION IV – MANDATORY FINDINGS OF SIGNIFICANCE: States whether environmental effects associated with development of the proposed Project are significant, and what, if any, added environmental documentation may be required.

SECTION V – REFERENCES: Identifies source materials that have been consulted in the preparation of the IS.

SECTION IV – REPORT PREPARERS: Identifies the firms and individuals who prepared the IS.

APPENDICES: Includes technical reports, the Comments and Responses Addendum and Mitigation Monitoring and Reporting Program (in Final IS/MND)

II. PROJECT DESCRIPTION

Project Name:	Novato Unified School District Grounds Maintenance and Operations Building
Project Location:	971 C Street, Novato, CA 94947 APN # 157-980-07
Project Applicant and Lead Agency Contact:	Novato Unified School District Mr. Michael Woolard, Executive Director of Facilities Novato Unified School District 1015 Seventh Street Novato, CA 94945 (415) 415 493-4588 MWoolard@nUSD.org
General Plan Designation:	City of Novato, Community Facilities (CF)
Zoning:	City of Novato, Community Facilities (CF)
Project Approvals:	NUSD approval of new buildings
Date Initial Study Completed:	June 10, 2019

PROJECT DESCRIPTION

Project Location

The project site is located in the Hamilton neighborhood within the City of Novato, in Marin County, east of Highway 101 and south of Highway 37. (See Figure 1). The project is proposed on a 2.67-acre parcel at the southwest corner of State Access Road (also known as Hamilton Parkway) and “C” Street. Local access to the site is provided by C Street from State Access Road. Regionally, the project site is accessed from US Highway 101, via Nave Drive and Main Gate Road.

Project Site History and Existing Conditions and Land Uses

The proposed new building and parking lot would be constructed on a 2.67-acre, mostly vacant site that had, up until 2012 contained a 41,140 square-foot warehouse building that was originally constructed in 1975. As shown in Figure 2, the project site is the northern portion of a larger parcel,

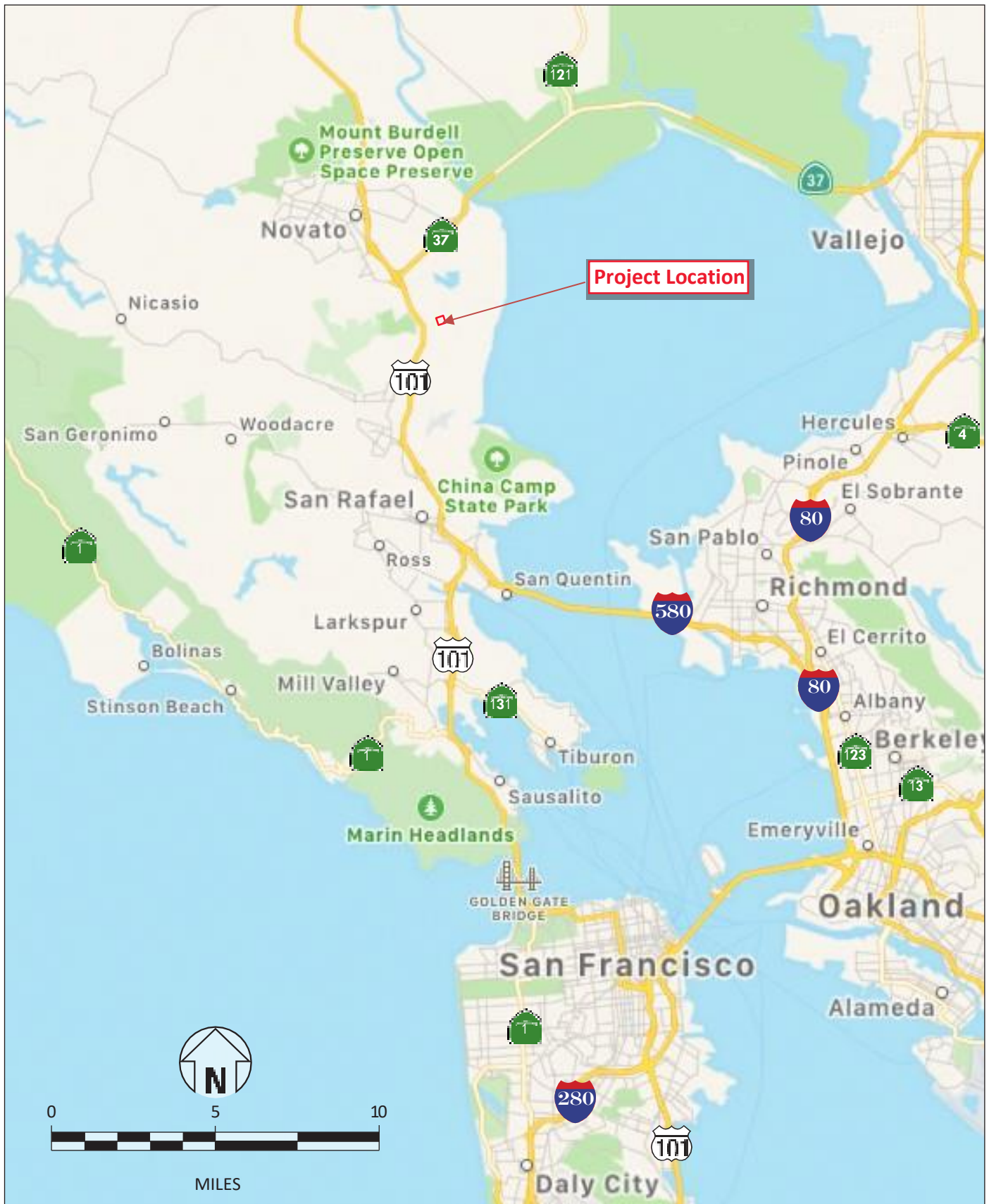


Figure 1
Project Location

Source: TomTom Maps and Grassetti Environmental

totaling 9.2 acres – known as Parcel 1A – conveyed to the District under a program established by the Department of Defense through the United States Department of Education.



Figure 2. Site History – Former Buildings on Parcel 1A

As shown in Figure 3, the site has been cleared of the former warehouse, remediated, and currently, much of the mostly level site is covered with gravel.

Surrounding Land Uses

The project site is bounded on the north by State Access Road/Hamilton Parkway and a senior apartment project that is currently under construction; on the south by the remainder of Parcel 1A -- vacant land that once contained a Navy Public Works Center – which is periodically used for materials storage¹; on the east by C Street, Smart Train tracks, and single-family homes; and west by multi-family housing. (See Figure 3.)

¹ The site was recently rented by an electrical contractor performing infrastructure work in the area for use as a staging and materials storage yard. This agreement concluded on February 1, 2019.

Proposed New Building and Site Improvements

The proposed Grounds, Maintenance, and Operations (GMO) building is described below and the site and floor plans are shown below in Figures 4 and 5.

The project includes construction of a 9,600 square foot, one-story, 17' 3"-foot-high GMO building and associated improvements. The building dimensions would be approximately 60 by 160 feet and would contain three large shop spaces, two small offices, a meeting room, kitchen, locker room, shower, restroom, and file room. The building would house 15 employees.

Associated improvements include a 30,300 square foot parking lot measuring 212 by 134 feet, storage areas, a dumpster enclosure, landscaping, and utilities. An existing loading dock at the northwest corner of the site will be retained and used by the project.



Figure 3. Aerial Photograph

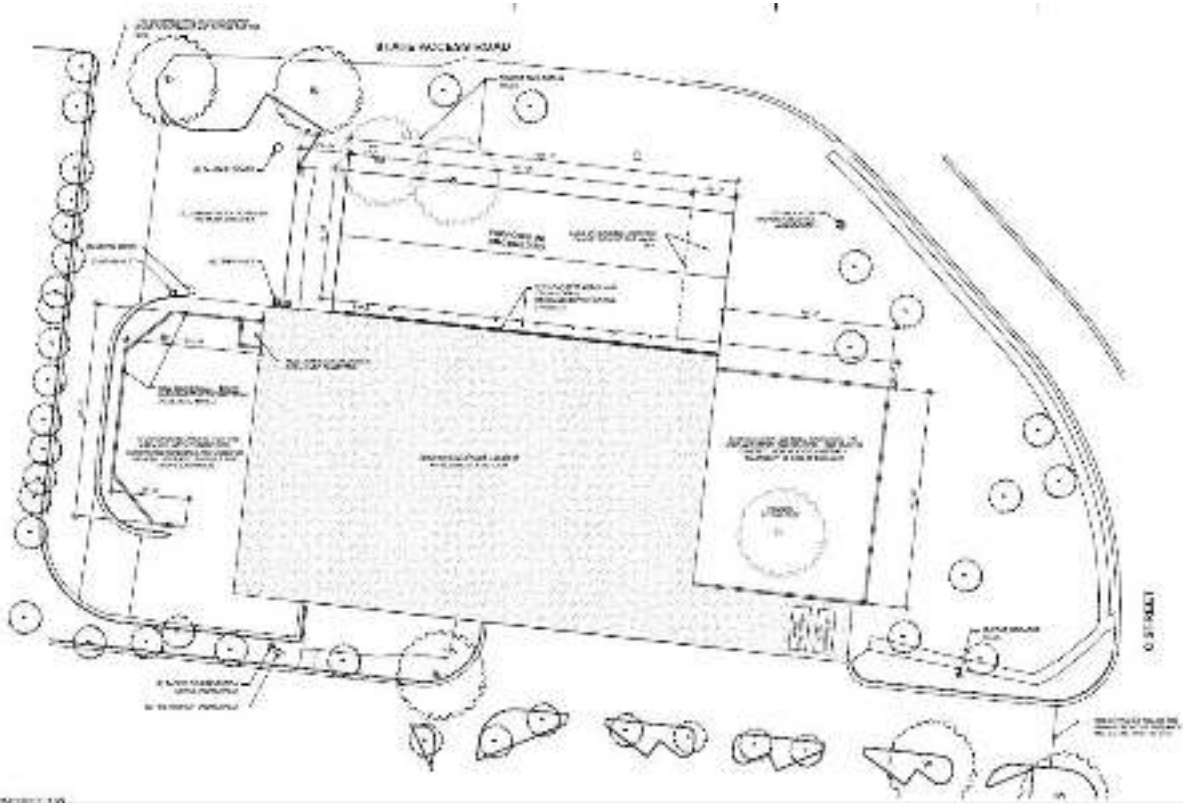


Figure 4. Proposed Site Plan

Source: CA+SA Studio

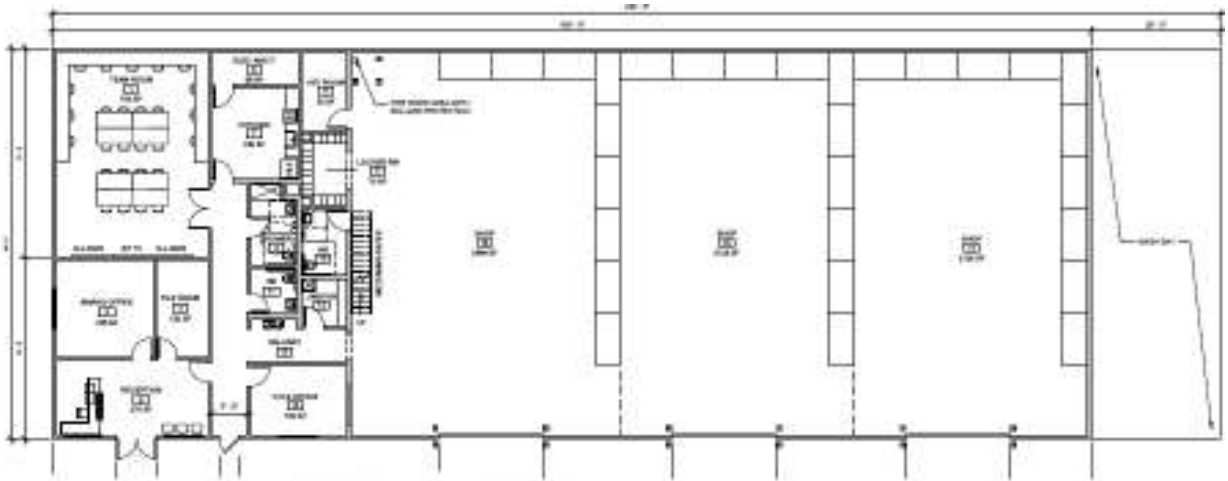


Figure 5. Proposed Floor Plan

Source: CA+SA Studio

Primary site access will be provided via the existing access drive from C Street at the southeastern edge of the site. Secondary access, primarily for deliveries, would be provided via State Access Road at the northwestern end of the site near the existing loading dock.

Capacity Increases. No staff would be added to the District due to the project. Fifteen District employees would be relocated from the NUSD Grounds Department currently located on the Novato High School campus at 625 Arthur Street and the current Operations and Maintenance Facility at 819 Olive Avenue in Novato. The building on the Novato Campus would be demolished and the Olive Avenue space would be occupied by the Nutritional Services Department, which would move from its current location at Lynwood Elementary School (1320 Lynwood Drive).

Operational Characteristics. The proposed GMO Building would be the District's central location for the Operations and Maintenance Department. The 15 employees would report to the project site at 6:30 AM to prepare District vehicles for dispatch to the District's 13 schools and the District Office. The GMO employees engage in landscaping and grounds maintenance, carpentry, plumbing, electrical work, heating and ventilation, and painting. Some fabrication work would be undertaken onsite, although a majority of the Department's work takes place at the individual school sites. Employees would return to the project site at approximately 2:00 PM to return the District vehicles and equipment, and finish by 2:30 PM to depart in their personal vehicles.

Energy Conservation Features. The building would comply with Title 24, which includes requirements for energy conservation and green building design.

Tree Removal. Four mature trees would be removed as a result of the project. No new trees would be planted as part of the project, although as shown in Figures 3 and 4, about 40 other existing trees on and adjacent to the site would remain.

Hardscape. The project would have approximately 9,600 square feet of new building area, 2,690 square feet of concrete paving, and 39,321 square feet of asphalt paving.

Grading and Earthwork. The preliminary Project grading scheme results in an estimated balance of earthwork of 2,500 cubic yards of cut and 2,500 cubic yards of fill. Minimal topographic changes would occur as a result of the project as the site is relatively flat.

Drainage. The project would result in new impervious surfaces being created on the site. Drainage would be directed into an on-site storm drain system that would discharge into the large drainage pipe just north of the project site. Peak flows would not be expected to exceed those from prior site conditions, before the Exchange Building and associated parking lot were removed.

Schedule and Timing

This Project would be constructed in one phase. It is anticipated that construction would begin as early as July of 2019 and would take approximately 6 months to complete.

Construction Details

Equipment Use. Equipment used during construction would vary by phase, but would include excavators, backhoes, dump trucks, graders, compactors, water trucks, and similar equipment.

Construction Hours. Typical construction hours would be 7:00 am to 4:30 pm, weekdays only.

Construction Staging Areas. Construction staging area would be located immediately south of the site in the parking lot on the remainder of NUSD Parcel 1A.

Construction Workers. There would be ten to 12 construction workers onsite on an average day.

Land Use Entitlements and other Agency Approvals

NUSD Approvals. The School District is a local agency with independent discretionary authority over the site's land use for education-related purposes. The District would take approval actions for the Project at a noticed NUSD Board of Trustees Meeting.

Other Approvals. The building plans would be reviewed for approval by the District. The project does not house students or teachers, so it does not require Field Act compliance, and is exempt from review by the Division of the State Architect. Because the project is proposed on NUSD property, and part of a Master Planned Educational Facility, it is exempt from City of Novato land use regulations. It is, however, required to comply with Title 24 and the California Building Code.

III. INITIAL STUDY CHECKLIST

The initial study checklist recommended by the CEQA Guidelines is used to describe the potential impacts of the proposed Project on the physical environment.

I. Aesthetics

Would the Project:

Environmental Issue	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect on a scenic vista?				X
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?				X
c) In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?			X	
d) Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?			X	

Discussion

a, b) The project site and vicinity are in a mostly flat urbanized area lacking in visual unity, with mixed visual quality. As shown in Figures 3, 7, 10, and 12, the site is mostly vacant and covered with gravel, several trees, and shrubs, and limited paved area. The site contains one metal storage container, some deteriorating fencing, and old electrical equipment. Most of the land in the area, including the project site, has been or is in the process of

being redeveloped and transformed from the former military support uses to a mix of residential, educational, and institutional uses. There are a number of mature trees in the area. Intermittent distant views of the hillsides to the west are also available from the project area. There are no view corridors to unique or large-scale natural or dramatic scenic features within the Project viewshed.

The proposed building would not affect views from or to nearby hillsides or ridgelines. Views of the proposed building from the existing townhomes to the west would be limited or blocked by new perimeter fencing and the mature trees located between the townhomes and the project site. The project would be visible from the from the apartments under construction north of the project site, however, the proposed building would be approximately 17 feet high and would not block any scenic features or vistas from the future residents of the apartments.

There are no rock outcroppings, historic buildings, or scenic highways on or immediately adjacent to the project site. There are also no designated scenic highways with views of the site. In addition, the two-story multi-family housing, fencing, and mature trees located between the project site and Highway 101 obscure views of the site. Therefore, the Project would have **no impact** on scenic vistas or scenic resources.

- c) As shown in Figures 3, the Project site is within an urbanized area. Although the site has been withdrawn by the NUSD from City of Novato planning jurisdiction, plan compliance can be used as an indicator of impact significance. The project site is zoned Community Facilities (CF) and the project is consistent with the zoning. Scenic resources in Novato, include hillsides, ridgelines, bay plains, and bay shorelines. The City of Novato General Plan 2035 identifies Scenic Hills and Ridges and Scenic Conservation Areas (Public Review Draft, Figure EL-6, 2016). The project site is not within one of these designated areas. The City of Novato Hillside Ordinance (Zoning Code Section 19.26) was adopted to protect views of undeveloped hillsides and ridgelines, which are a key component of the city's identity. The Ordinance limits grading and development in hillside areas. The project would not conflict with any of the City of Novato ordinances or policies governing scenic quality. Since there would be no conflicts, the project would have **no impact** on visual-related plans or policies.
- d) The Project would include security lighting for the proposed new building, however this lighting would be shielded and would not be expected to generate significant sources of light visible to existing and future residents west and north of the site. Therefore, light and glare impacts would be **less than significant**.



Figures 6 and 7: Views from the Project Site to the north towards apartments under construction across State Access Road



Figure 8: View from the Project Site to the south towards the remainder of Parcel 1A



Figure 9: View from the Project Site to the southeast towards the remainder of Parcel 1A, the South Novato Library, and single-family homes in the background



Figure 10: Looking east across the site towards C Street (existing loading dock onsite in foreground)



Figure 11: Looking east across the site towards the SMART Train Tracks with single-family homes on the other side of the tracks



Figure 12: View looking west from Project Site showing trees bordering the western boundary and apartments under construction across the State Access Road



Figure 13: View looking west down State Access Road (Project Site is south and apartments under construction are north of the road)



Figure 14: View of site and the remainder of Parcel 1A from C Street looking northwest

Existing residents in the townhomes to the west and future residents of the apartments under construction to the north have and will have limited views of site from upper story windows. However, the existing trees and fencing that line the west and north edges of the project site obscure full views of the site. Moreover, the existing views of the site, which contains a storage container, and remnants of storage areas, fencing, electrical equipment, and wood framing (see Figure 7). These views would not be affected by the proposed Project.

Views from the rear windows of a limited number of residences north, west and possible, east of the project site would change. However, this change would not significantly diminish the visual quality of the site for the following reasons: the project site is currently in a dilapidated state, the proposed warehouse building would only cover approximately 9,600 square foot, or less than ten percent of the site, and would be one story, and all but four of the trees that border the site would be preserved and would continue to screen the site from view.

Based on the above analysis, the impact to the area's views and visual quality would be **less than significant**.

II. Agricultural and Forestry Resources

Would the Project:

Environmental Issue	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?				X
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?				X
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))?				X
d) Result in the loss of forest land or conversion of forest land to non-forest use?				X
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?				X

Discussion

a-e) Until recently, the Project site currently contained a warehouse building and the site was recently graded and covered with gravel. The site is designated Public Facility in the Novato General Plan (City of Novato General Plan 2035, Map GP-1, 2016) and Zoning maps (City of Novato 2001). The Project sites contains no Prime Farmland, Unique Farmland, Farmland of Statewide Importance, active agricultural operations, or forest resources (Marin County Important Farmland 2014, California Department of Conservation, Division of Land Resource Protection, July 2016). Four mature trees would be removed as part of the Project. In addition, the City of Novato Existing Conditions Report Figure 9-1 Vegetation, shows the site as “Urban/Developed Land.” The project would not result in the conversion of farmland or forestland to non-agricultural uses. For these reasons, there would be **no impact** on agricultural and forestry resources.

III. Air Quality

Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the Project:

Environmental Issue	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Conflict with or obstruct implementation of the applicable air quality plan?			X	
b) Result in a cumulatively considerable net increase of any criteria for which the Project region is non-attainment under an applicable federal or state ambient air quality standard?			X	
c) Expose sensitive receptors to substantial pollutant concentrations?		X		
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?			X	

Background

According to the Bay Area Air Quality Management District (BAAQMD), Marin County is a distinct climatological sub-region of the Bay Area air basin. The air pollution potential is highest in eastern Marin where most of its population resides. In the southeast, where the influence of marine air is greatest, air pollutant levels are relatively low, but they increase as one moves north and the marine influence decreases. Marin County has few large-scale air polluting industries, rather most of the air pollutants affecting its population come from motor vehicles — especially from traffic using Highway 101 and the connecting major arterial roadways.

Ozone and suspended particulate matter (i.e., two types of the latter - particulate matter less than ten microns in diameter [PM₁₀] and particulate matter less than 2.5 microns in diameter [PM_{2.5}]) are of particular concern in the Bay Area, which is currently designated “nonattainment” for state and national ozone ambient air quality standards, for the state PM₁₀ standards, and for state and national PM_{2.5} standards; it is “attainment” or “unclassified” with respect to all the other major air pollutants. The BAAQMD maintains a number of air quality monitoring stations, which continually measure the ambient concentrations of major air pollutants throughout the Bay Area. The closest such monitoring station to the Project site is at 534 4th Street in San Rafael, about 6 miles to the south. The data collected (BAAQMD. Air Quality Summary Reports) show violations of the PM_{2.5} particulate standard on at most a few days per year over the last three years, see Table AQ-1.

Table AQ-1: Local Ambient Air Quality Monitoring Summary

Pollutant	Air Quality Standard	Maximum Concentrations and Number of Days Standards Exceeded		
		2015	2016	2017
Ozone				
Maximum 8-hour concentration (ppm)		70	67	63
# Days 8-hour California standard exceeded	70 ppb	0	0	0
Nitrogen Dioxide (NO₂)				
Maximum 1-hour concentration (ppb)		44	46	53
# Days national 1-hour standard exceeded	100 ppb	0	0	0
Suspended Inhalable Particulates (PM₁₀)				
Maximum 24-hour concentration (µg/m ³)		42	27	94
# Days national 24-hour standard exceeded	150 µg/m ³	0	0	0
Suspended Fine Particulates (PM_{2.5})				
Maximum 24-hour concentration (µg/m ³)		36.3	15.6	74.7
# Days national 24-hour standard exceeded	35 µg/m ³	2	0	8

Notes:

As monitored at the BAAQMD station at 534 4th Street in San Rafael.

µg/m³ = micrograms per cubic meter

ppb = parts per billion.

Source: BAAQMD Annual Bay Area Air Quality Summaries <http://www.baaqmd.gov/about-air-quality/air-quality-summaries>

The Project site is located in southern Novato in northeast Marin County. The largest group of local stationary air pollutant sources, which operate under BAAQMD permits, cluster in Novato’s commercial/industrial areas about a mile north of the Project site and east of Highway 101 (BAAQMD. Stationary Source Screening Analysis Tool). Highway 101 passes about 1000 feet west of the project site; it is the major local source of air pollutants, emitted by the thousands of motor vehicles using it daily, that affect the existing local population and would affect future Project site occupants.

Analysis Methodology and Significance Criteria

The air quality analysis addressing this Initial Study checklist items was performed using the methodologies and significance thresholds recommended in *CEQA Air Quality Guidelines (Guidelines; BAAQMD, May 2017, Table 2-1)*. The air pollutant impacts evaluated in the items a and b discussion below are from precursors to ozone formation

(i.e., reactive organic compounds [ROG] and nitrogen oxides [NO_x]) and small-diameter particulate matter (i.e., PM₁₀ and PM_{2.5}).

According to the *Guidelines*, any Project would have a significant potential for obstructing air quality plan implementation or making a cumulatively considerable contribution to a regional air quality problem if its pollutant emissions would exceed any of the thresholds presented in Table AQ-2 during construction or operation.

TABLE AQ-2: CEQA Air Quality Significance Thresholds for Air Pollutant Emissions

Pollutant	Construction Average Daily (lbs./day)	Operational	
		Average Daily (lbs./day)	Maximum Annual (tons/year)
Reactive Organic Gases (ROG)	54	54	10
Oxides of Nitrogen (NO _x)	54	54	10
Inhalable Particulate Matter (PM ₁₀)	82 (exhaust)	82	15
Fine Inhalable Particulate Matter (PM _{2.5})	54 (exhaust)	54	10
PM ₁₀ /PM _{2.5} (Fugitive Dust)	BMPs ^a	N/A	N/A

Notes: BMPs = Best Management Practices
N/A = Not Applicable

^a If BAAQMD Best Management Practices (BMPs) for fugitive dust control are implemented during construction, the impacts of such residual emissions are considered to be less than significant.

Source: Bay Area Air Quality Management District, May 2017, *CEQA Air Quality Guidelines*.

In addition to the major air pollutants (as identified above), many other chemical compounds, generally termed toxic air contaminants (TACs), pose a present or potential hazard to human health through airborne exposure. A wide variety of sources, stationary (e.g., dry cleaning facilities, gasoline stations, and emergency diesel-powered generators, etc.) and mobile (e.g., motor vehicles, construction equipment, etc.), emit TACs. The health effects associated with TACs are quite diverse. TACs can cause adverse health effects from long-term exposure (e.g., cancer, birth defects, neurological damage, asthma, bronchitis, or genetic damage) and/or from short-term exposure (e.g.,

eye watering, respiratory irritation, running nose, throat pain, and headaches). Most of the estimated carcinogenic/chronic health risk in California can be attributed to relatively few airborne compounds, the most important being particulate matter from diesel-fueled engines (DPM). The California Air Resources Board (CARB. Summary: Diesel Particulate Matter Health Impacts) has identified DPM as being responsible for about 70 percent of the cumulative cancer risk from all airborne TAC exposures in California.

The *Guidelines* establish a relevant zone of influence for an assessment of project-level and cumulative health risk from TAC exposure to an area within 1,000 feet of a project site. Project construction-related or Project operational TAC impacts to sensitive receptors within the zone that exceed any of the following thresholds are considered significant:

- An excess cancer risk level of more than 10 in one million
- A non-cancer hazard index greater than 1.0.
- An incremental increase of greater than 0.3 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$) for annual average $\text{PM}_{2.5}$ concentrations.

Cumulative impacts from TACs emitted from freeways, state highways or high-volume roadways (i.e., the latter defined as having traffic volumes of 10,000 vehicles or more per day or 1,000 trucks per day), and from all BAAQMD-permitted stationary sources within the zone to sensitive receptors within the zone that exceed any of the following thresholds are considered cumulatively significant:

- A combined excess cancer risk levels of more than 100 in one million.
- A combined non-cancer hazard index greater than 10.0.
- A combined incremental increase in annual average $\text{PM}_{2.5}$ concentrations greater than $0.8 \mu\text{g}/\text{m}^3$.

Discussion

- a) The BAAQMD's current *Clean Air Plan: Spare the Air, Cool the Climate* (2017 Plan), focuses on two closely-related goals: protecting public health from air pollutant exposures and reducing Bay Area emissions of heat-trapping gases (termed greenhouse gases [GHG]) that promote global climate change (Project GHG impacts will be addressed in Section VIII below).

Key elements in the 2017 Plan control strategies, with the underlined items having particular applicability to the Project, are:

Controls on Transportation Sources:

- Reduce motor vehicle travel by promoting transit, bicycling, walking and ridesharing.
- Implement pricing measures to reduce travel demand.

- Direct new development to areas that are well-served by transit, and conducive to bicycling and walking.
- Accelerate the widespread adoption of electric vehicles.
- Promote the use of clean fuels and low- or zero-carbon technologies in trucks and heavy-duty vehicles.

Controls on Buildings and Energy Sources:

- Expand the production of low-carbon, renewable energy by promoting on-site technologies such as rooftop solar, wind and ground-source heat pumps.
- Support the expansion of community choice energy programs throughout the Bay Area.
- Promote energy and water efficiency in both new and existing buildings.
- Promote the switch from natural gas to electricity for space and water heating in Bay Area buildings.

The Project site is well served by mass transit: Marin Transit bus service (i.e., Lines #35, #49, and #70) connect it to the local residential areas of Novato and to other Marin County communities, and the SMART Hamilton Novato station is about 1000 feet south of the site. The Project would construct a new office/maintenance facility with supporting parking lot for the Novato Unified School District (NUSD); this new use would be similar to the warehouse use that the site formerly contained. Thus, the Project would accommodate the needs of the NUSD to provide transportation services for the school children and staff; it would not have the potential to substantially increase regional housing, employment, and/or population levels in Marin County or the Bay Area, which are the bases of the 2017 Plan regional emission inventories and control strategies. Project construction will comply with the CALGreen (Title 24) statewide building energy code, a control strategy promoted by the 2017 Plan. The office/maintenance facility will include design provisions to accommodate rooftop solar panels (although there are no present plans for their installation) and electricity will be the facility's dominant energy source (with the exception of natural gas heaters in the Project garages for use on the few especially cold days during the year).

Compliance with BAAQMD-approved CEQA thresholds of significance is another condition for determining Project consistency with 2017 Plan control measures. Thus, the Project would have **less than significant** air quality impacts because it meets all BAAQMD CEQA emission thresholds (as addressed in the Items b discussion below).

- b) The BAAQMD *Guidelines* recommend quantification of Project construction and operational emissions and their comparison to the CEQA significance thresholds. For this, the California Emissions Estimator Model (CalEEMod, Version 2016.3.2) was used. CalEEMod was run using the model's "light industrial" source category for the proposed 9,600 sq. ft. Grounds, Maintenance and Operations Building (GMO) and the "parking lot" source category for the proposed 30,300 sq. ft. parking lot. The model's default emission

estimates for these sources are compatible with Project-specific specifications for daily motor vehicle trips and facility energy use.

Table AQ-3 shows the estimated exhaust air-pollutant emissions for all Project phases from construction equipment, haul/delivery trucks and worker commute vehicles. Tables AQ-4 and AQ-5 show the operational air-pollutant emissions from all Project stationary and mobile sources in the first year of operation (assumed to be 2020). All tables include comparisons with the BAAQMD CEQA significance thresholds. As can be seen on the tables, this impact would be **less than significant** and no mitigation is required.

**Table AQ-3: Project Construction Pollutant Emissions
(Maximum Pounds per Day)**

	ROG	NOX	PM10 (exhaust)	PM2.5 (exhaust)
	lbs./day			
Total Construction Sources	11.53	22.77	1.29	1.20
Significance Thresholds	54	54	82	54
Significant Impact?	No	No	No	No

**Table AQ-4: Project Operational Pollutant Emissions - Year 2020
(pounds per day)**

Emission Source Category	ROG	NOx	PM ₁₀	PM _{2.5}
Area	0.25	< 0.01	< 0.01	< 0.01
Energy	0.01	0.06	< 0.01	<0.01
Mobile	0.13	0.43	0.42	0.12
Total Project	0.38	0.49	0.42	0.12
Significance Thresholds	54	54	82	54
Significant Impact?	No	No	No	No

**Table AQ-5: Project Operational Pollutant Emissions - Year 2020
(tons per year)**

Emission Source Category	ROG	NOx	PM ₁₀	PM _{2.5}
Area	0.05	< 0.01	< 0.01	< 0.01
Energy	< 0.01	0.01	< 0.01	< 0.01
Mobile	0.02	0.06	0.06	0.02
Total Project	0.06	0.07	0.06	0.02
Significance Thresholds	10	10	15	10
Significant Impact?	No	No	No	No

- c) The nearest sensitive receptors to the Project site are: the Lanham Village residential community, which includes the Wonder Nook Preschool, to the west and southwest (closest residential units about 200 feet from project site center, which would be the receptor maximally exposed [i.e., the MER] to pollutants emitted during Project construction), the single-family residential development at Hamilton Field to the northeast and east (closest units about 400 feet from project site center), and the South Novato Library, the North Bay Children's Center, and the Novato Charter School to the southeast (at about 600 feet, 800 feet and 1200 feet, respectively).

A screening health risk assessment (HRA) for TAC and particulate exposures to nearby sensitive receptors from Project construction activities was conducted following guidelines established by the California Office of Environmental Health Hazard Assessment (OEHHA 2015) and the BAAQMD (2012).

Cancer risk is the probability of developing cancer from a lifetime exposure (i.e., 70 years) to carcinogenic substances. The likelihood of other adverse chronic health impacts unrelated to cancer are measured using a hazard index (HI) defined as the ratio of a project's incremental annual TAC concentration to a published reference exposure level (REL) as determined by OEHHA (which for DPM is 5 µg/m³). Project incremental cancer risks and HI were estimated by applying established DPM toxicity factors to the construction equipment exhaust DPM concentrations estimated by the SCREEN3 model (Lakes Environmental).

As shown in Table AQ-6, the cancer risk from Project construction DPM at the existing adjacent residential uses most exposed to TACs from Project construction would be 7.09 additional cancer cases per million people exposed, which is below the project-level CEQA threshold for cancer risk. The HI from Project construction DPM would be 0.183, which is well below the BAAQMD threshold for chronic hazard. But the modeled annual PM_{2.5} concentration from Project construction would be 0.917 µg/m³, which substantially exceeds the Project-level CEQA threshold (0.3 µg/m³).

Implementation of mitigation measure AQ-1 would assure that annual average PM_{2.5} concentrations at the existing adjacent residential receptors due to Project construction would be well below the CEQA PM_{2.5} threshold (and would substantially reduce cancer risk and chronic hazard, as well), as also shown in Table AQ-6. With this mitigation measure, this impact would be reduced to a **less-than-significant** level.

After it is operational, the Project would not include substantial stationary TAC emission sources nor add substantial mobile TAC emission sources (i.e., by BAAQMD definition, daily incremental traffic volumes of 10,000 or greater) to local streets.

As also shown in Table AQ-6, the cumulative TAC exposure at the MER would be considerably below the BAAQMD cumulative thresholds for cancer risk, chronic hazard and annual PM_{2.5} concentration.

To reduce the exposure of local sensitive receptors to PM₁₀ and PM_{2.5} in the fugitive dust released during Project construction, the BAAQMD *Guidelines* also require that all Bay Area construction projects implement Best Management Practices (BMPs) to control fugitive dust emissions. Thus, the following basic control measures must be implemented by the Project construction contractor:

BAAQMD Required Dust Control Measures: The construction contractor shall reduce construction-related air pollutant emissions by implementing BAAQMD's basic fugitive dust control measures, including:

- All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day.
- All haul trucks transporting soil, sand, or other loose material off site shall be covered.
- All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.
- All vehicle speeds on unpaved surfaces shall be limited to 15 miles per hour.
- All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.
- A publicly visible sign shall be posted with the telephone number and person to contact at Novato Unified School District regarding dust complaints. This person shall respond and take corrective action with 48 hours. The BAAQMD's phone number shall also be included to ensure compliance with applicable regulations.

Table AQ-6: Project and Cumulative TAC Impacts on Maximally Exposed Existing Sensitive Receptor (MER) in the Project Site Vicinity

BAAQMD Source #	Facility	Address	Cancer Risk	Hazard Index	PM _{2.5} Concentration
From Permitted Stationary TAC Sources					
	None are within 1000 feet of the Project site		----	----	----
From Major Roadways*					
	Highway 101 (MER is ~1000 feet east of the nearest highway travel lane)		12.791	0.013	0.122
From Project**					
	Project Construction Impacts before Project Mitigation		7.09	0.183	<u>0.917</u>
	Project-Level Significance Thresholds		10	1.0	0.3
	Significant Project-Level Impact before Project Mitigation?		No	No	<u>Yes</u>
	Project Construction Impacts after Project Mitigation		1.06	0.028	0.136
	Significant Project-Level Impact after Project Mitigation?		No	No	No
From Cumulative Sources					
	Cumulative Sources Impact after Project Mitigation		13.86	0.04	0.26
	Cumulative Significance Thresholds		100	10	0.8
	Significant Cumulative Impact after Project Mitigation?		No	No	No

*The BAAQMD's Highway Screening Analysis Tool and Roadway Screening Analysis Calculator were used to estimate maximum cancer risks, hazard indexes, and PM_{2.5} concentrations at the closest existing residences to the Project site.

**The Project construction risk, hazard and PM_{2.5} increments, as estimated by the SCREEN3 model, are reduced by more than 80 percent, to a less-than-significant level relative to the CEQA PM_{2.5} project-level significance threshold, by requiring that Project construction equipment have at least EPA-rated Tier 4 engines or Level 3 diesel particulate filters (Mitigation Measure AQ-1).

- d) Project operation would not introduce substantial sources of odor emissions to the area. However, the Project's diesel-powered construction equipment would emit odorous exhaust that could impact existing local residents. But since the Project construction activities would be temporary and the closest local odor-sensitive receptors (i.e., the existing low-density residential uses, day care facilities, school and library) are all at distances greater than a few hundred feet from the site center, construction odor emissions would not affect a substantial number of people, nor be substantially objectionable to any particular receptor over extended periods while construction is underway. Therefore this impact would be **less than significant**.

Mitigation Measures

Mitigation Measure AQ-1. The Project construction contractor shall implement the following measures to further reduce construction-related DPM exhaust emissions:

All off-road equipment greater than 25 horsepower (hp) and operating for more than 20 total hours over the entire duration of construction activities shall meet the following requirements:

- All engines shall meet or exceed USEPA/CARB Tier 4 off-road emission standards; or
- All engines shall be equipped with a CARB Level 3 Verified Diesel Emissions Control Strategy (VDECS) device.

IV. Biological Resources

Would the Project:

Environmental Issue	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?		X		
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies or regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?				X
c) Have a substantial adverse effect on federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?				X
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?				X

Environmental Issue	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?				X
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?				X

Background

This report presents the methods and results of a biological habitat evaluation conducted by

Vollmar Natural Lands Consulting, Inc. (VNLC) for the project site. This habitat evaluation was conducted to identify and characterize existing conditions within the approximately 2.67 acres of the proposed project, as well as to assess the potential for special-status species, habitats, and jurisdictional features to occur within the project site. The habitat evaluation consisted of a literature review and site reconnaissance by two VNLC biologists. During the site visit, all observed flora and wildlife species, general conditions, and notable habitat features were recorded. A search was conducted for jurisdictional features (wetlands and other waters, etc), sensitive habitats (native grasslands, etc), and habitat potential for special-status species (nesting potential, burrows, etc).

Approximately 0.98 acres of the site is vegetated or unpaved, and dominated by previously planted landscaping (mix of native and non-native species), ruderal grassland species, and mature trees. The north and west sides of the site contain a mixed line of mature coast live oak (*Quercus agrifolia*), one valley oak (*Quercus lobata*), maple (*Acer macrophyllum*), one red willow (*Salix laevigata*), and ornamental sweet gum (*Liquidambar styraciflua*) trees.

The eastern portion of the project site is a mix of unmaintained landscaping and ruderal grassland, including species such as planted palm trees (unknown species), native and non-native shrubs including coyote brush (*Baccharis pilularis*), and camphor tree (*Cinnamomum camphora*), and herbaceous species including firethorn (*Pyracantha* sp.), fennel (*Foeniculum vulgare*), Bermuda grass (*Cynodon dactylon*), and Himalaya blackberry (*Rubus armeniacus*). The eastern portion of the site also includes one coast live oak that is zoned for removal. Small rodent activity was observed in this portion of the site, though no large burrow complexes were noted.

The remaining approximately 1.69 acres (mainly the central portion of the site) is paved or graveled, and unvegetated.

Based on habitat requirements and regional distribution, no State or federally Threatened or Endangered species are expected to occur on the project site. However, four special-status species have potential to occur on site and to be impacted by the direct project activities (tree removal or construction related noise). These include:

- Oak titmouse (*Baeolophus inornatus*) (federal Bird of Conservation Concern);
- Pallid bat (*Antrozous pallidus*) (State Species of Special Concern);
- Western red bat (*Lasiurus blossevillii*) (State Species of Special Concern); and
- Hoary bat (*Lasiurus cinereus*) (State Special Animal).

In addition, the project site could support nesting and migrating birds covered under the Migratory Bird Treaty Act (16 U.S.C. 704) and the California Fish and Game Code (Section 3503). These laws prohibit the take of migratory birds, or disturbance to the active nests of most native birds. In addition to the oak titmouse detailed above, a number of additional migratory birds have potential to occur within the regional vicinity of the project area. These include Allen's hummingbird (*Selasphorus sasin*), black rail (*Laterallus jamaicensis*), black turnstone (*Arenaria melanocephala*), Clark's grebe (*Aechmophorus clarkii*), common yellowthroat (*Geothlypis trichas sinuosa*), Lawrence's goldfinch (*Carduelis lawrencei*), Lewis's woodpecker (*Melanerpes lewis*), long-billed curlew (*Numenius americanus*), marbled godwit (*Limosa fedoa*), Nuttall's woodpecker (*Picoides nuttalli*), American bushtit (*Psaltriparus minimus*), Rufous hummingbird (*Selasphorus rufus*), short-billed dowitcher (*Limnodromus griseus*), song sparrow (*Melospiza melodia*), spotted towhee (*Pipilo maculatus clementae*), tricolored blackbird (*Agelaius tricolor*), whimbrel (*Numenius phaeopus*), willet (*Tringa semipalmata*), and wrentit (*Chamaea fasciata*).

Multiple bird species were observed on or adjacent to the project site during the field visit, including western scrub-jay (*Aphelocoma californica*), red-shouldered hawk (*Buteo lineatus*), Anna's hummingbird (*Calypte anna*), turkey vulture (*Cathartes aura*), American bushtit (*Psaltriparus minimus*), American crow (*Corvus brachyrhynchos*), black phoebe (*Sayornis nigricans*), western bluebird (*Sialia mexicana*), ring-billed gull (*Larus delawarensis*), American robin (*Turdus migratorius*), and white-crowned sparrow (*Zonotrichia leucophrys*). Additionally, due to the presence of large trees and signs of small mammal activity, raptors could potentially use the site for foraging.

As discussed above, the site supports about 47 mature native oak trees. No additional sensitive plant communities were observed or expected to occur on the project site. No potential jurisdictional wetlands or Waters of the United States were observed on the projectsite.

Discussion

- a) The project has the potential to affect the following special-status species:

Migratory and Nesting Protected Bird Species. The project could affect migratory birds by tree removal and noise impacts on active nests. This potentially significant impact would

be reduced to a **less-than-significant** level by implementation of Mitigation Measures BIO-1 and BIO-3, below.

Oak titmouse (*Baeolophus inornatus*). This species usually nests in tree cavities, though it will occasionally utilize stumps, fenceposts, pipes, eaves, or holes in riverbanks. The established, mature oak trees on the project site (especially along the western portion of the site) provide potential habitat for this species. The oak titmouse has the potential to be impacted by the direct project activities (tree removal) or construction related noise. Impacts to this species can be reduced to a **less-than-significant** level by implementation of Mitigation Measures BIO-1 and BIO-3, below.

Pallid bat (*Antrozous pallidus*). This species roosts at night in many types of habitat, including open buildings, porches, garages, highway bridges, and mines, with adequate cover for protection from high temperatures. Pallid bat is extremely sensitive to human disturbance of roosting sites, and has the potential to be impacted by the direct project activities (tree removal) or construction related noise. Impacts to this species can be reduced to a **less-than-significant** level by implementation of Mitigation Measure BIO-2, below.

Western red bat (*Lasiurus blossevillii*). This bat is a migratory species similar to birds, and may be found in forests roosting in the foliage of trees. The western red bat has the potential to be impacted by the direct project activities (tree removal) or construction related noise. Impacts to this species can be reduced to a **less-than-significant** level by implementation of Mitigation Measure BIO-2, below.

Hoary bat (*Lasiurus cinerus*) This species prefers open habitats for foraging which also contain trees for cover and roosting, preferring to roost in the dense foliage of medium to large trees. The hoary bat has the potential to be impacted by the direct project activities (tree removal) or construction related noise. Impacts to this species can be reduced to a **less-than-significant** level by implementation of Mitigation Measures BIO-2, below.

- b) The project would not affect any riparian habitat or sensitive natural communities, as none of those are present on the site. **No impact** would occur.
- c) The project would not affect any wetlands habitats, as none of those are present on the site. **No impact** would occur.
- d) The project has no potential to impede any migration corridors. With respect to native wildlife nursery sites, see Migratory and Nesting Bird Species discussion, above. **No impact** would occur.

- e) The project would remove Three coast live oak trees, and potentially one red willow. The City of Novato regulates the removal or alteration of trees to preserve scenic beauty, maintain property values, minimize erosion problems, and maintain the attractiveness of the Novato area. However, the City does not have jurisdiction over on-site activities, as this site falls under NUSD jurisdiction. Therefore, the District would not be required to obtain a tree removal permit from the City of Novato for their removal. **No impact** would occur.

- f) The project site is not covered by any federal, state, or local conservation plan. Therefore, the project would have no impact. With respect to habitat conservation plan compliance.

Mitigation Measures

Measure BIO-1: Prevent Loss of Active Bird Nests. A pre-construction survey for nesting birds shall be conducted by a qualified biologist within two weeks of construction activities, if activities are to occur within nesting/breeding season of native bird species (February-August). If active nests are identified within 300 feet of construction, and would be exposed to prolonged construction-related noise above normal levels, a buffer shall be implemented around nests during the breeding season, or until a biologist determines the young have fledged. The size of the buffer and the type of construction activity will depend on multiple factors including relative change in noise and disturbance during construction activity, amount of vegetative screening between activity and nest, and sensitivity of species.

Measure BIO-2: Prevent Loss of Roosting Habitat for Bat Species. The potential of the large trees to provide suitable roosting habitat shall be assessed by a qualified bat biologist, and if necessary, a roosting bat protection plan shall be implemented. If bats are determined to be using the site, minimization measures shall include prohibiting night work activities (between 10pm and sunrise), and minimizing work activities to outside of the most sensitive breeding (non-volant) period of April to August.

V. Cultural Resources

Would the project:

Environmental Issue	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?			X	
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?		X		
c) Disturb any human remains, including those interred outside of dedicated cemeteries?		X		

Background

This analysis considers the project’s impact to historical and archaeological resources, and human remains on the project site.

Discussion

- a) Archival research, an intensive archaeological survey, and coordination with the Native American community did not result in the identification of any prehistoric, ethnographic, or historic-era cultural sites, features, artifacts, or other properties within or immediately adjacent to the project site. Consequently, the project site contains no historical resources as defined in CEQA Guidelines Section 15064.5; therefore, the project would have a **less-than-significant** impact on historical resources.
- b) Although the likelihood of project ground-disturbing activities encountering and disturbing archaeological resources is low, prehistoric, ethnographic-era, and historic period cultural resources are known to be present in the general area.

The City of Novato’s Cultural Resources Ordinance (No. 923) offers guidance for the preservation and investigation of cultural resources. This Ordinance requires that an archaeological investigation be conducted prior to the City issuing any building or grading permit whenever construction or other activities are proposed that could disturb recorded or previously undocumented cultural sites, features, artifacts, or other culturally important properties.

Three cultural resources, CA-MRN-159, CA-MRN-160, and P-21-0001962, are located within the half-mile search radius. Resource P-21-0001962 consists of the Hamilton Army Air Field Discontiguous Historic District which was nominated for listing on the National Register of Historic Places in 1998 (Table CULT-1). The project area was initially located within this district but a 2018 re-assessment by the California State Historic Preservation Officer resulted in this area being excluded from the District. Building 971, the Navy Exchange building (comparable to an army base “Post Exchange”) which until recently was within the project area prior to its demolition, was originally built in 1953, and likely rebuilt in 1975, but is not listed in any documentation of the District and as a result, it is not noted here as a cultural resource.

Table CULT-1. Previously Documented Cultural Resources within One Half-Mile of the Project Area

Resource No.(s)	Association	Type
CA-MRN-159	Prehistoric	Sparse midden containing shell, fire-cracked rock, charcoal, midden soil
CA-MRN-160	Prehistoric	Shell midden/mound documented by N.C. Nelson in 1907
P-21-001962	Historic era	Hamilton Army Air Field Discontiguous Historic District

Based on the presence of both prehistoric and historic-era archaeological site and features present in the vicinity of the proposed Project, comparable sites could be encountered within the study area. Early Native American archaeological materials that could be found include but are not necessarily limited to: obsidian and chert flakes and flaked stone tools; ground stone tools such as grinding slabs and handstones, and mortars and pestles; bedrock outcrops and boulders with mortar cups; and discreet darkened midden soils containing flaked and ground stone tools and fragments of bone, shellfish, and fire-cracked rock fragments. Historic period site indicators can include fragments of glass, and ceramic, and metal objects; milled and split lumber; and structure and feature remains such as building foundations and trash deposits (e.g., wells, privy pits, dumps). Should prehistoric or historic-era materials and sites be encountered as a result of Project ground-disturbing activities, Mitigation Measures CULT-1 and CULT-2 would reduce this **potentially significant** impact to a **less-than-significant** level.

- c) Although no prehistoric or historic-era human remains have been identified within or near the project site, it is possible that presently undocumented human interments may be uncovered during excavation activities. This **potentially significant** impact would be a

potentially significant. Implementation of Mitigation Measures CULT-2 and CULT-3 would reduce this impact to a **less-than-significant** level.

Mitigation Measures

Mitigation Measure CULT-1: Archaeological Deposits. If archaeological remains are encountered during project activities, project ground disturbances at the find and immediate vicinity shall be halted immediately until a qualified archaeologist can evaluate the finds (§15064.5 [f]). The archaeologist shall examine the finds and recommend mitigation measures which may include documentation in place, avoidance, testing, and/or data recovery.

Mitigation Measure CULT-2: Training Session. To ensure that the procedures outlined in Mitigation Measures CULT-1 and CULT-3 are followed during construction, the District shall hold a training session for all Contractor field personnel led by a qualified archaeologist to explain the types of cultural items could be found during construction. The training shall include discussion on the possibility of unearthing human remains, and protocol for ensuring that artifacts, cultural deposits, and/or inhumations are not impacted during construction. The District shall invite the Tribe to attend the training session.

Mitigation Measure CULT-3: Human Remains. California law recognizes the need to protect interred human remains, particularly Native American burials and associated items of patrimony, from vandalism and inadvertent destruction. The procedures for the treatment of discovered human remains are contained in California Health and Safety Code Section 7050.5 and Section 7052 and California Public Resources Code Section 5097.

In accordance with the California Health and Safety Code, if human remains are uncovered during ground disturbing activities all such activities in the vicinity of the find shall be halted immediately and the District or the District's designated representative shall be notified. The District shall immediately notify the county coroner and a qualified professional archaeologist. The coroner is required to examine all discoveries of human remains within 48 hours of receiving notice of a discovery on private or state lands (Health and Safety Code Section 7050.5[b]). If the coroner determines that the remains are those of a Native American, he or she must contact the Native American Heritage Commission (NAHC) by phone within 24 hours of making that determination (Health and Safety Code Section 7050[c]). The responsibilities of the District for acting upon notification of a discovery of Native American human remains are identified in detail in the California Public Resources Code Section 5097.9. The District or their appointed representative and the professional archaeologist will consult with a Most Likely Descendent determined by the NAHC regarding the removal or preservation and avoidance of the remains and determine if additional burials could be present in the vicinity.

VI. Energy

Would the Project:

Environmental Issue	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?			X	
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?			X	

Discussion

- a) The project would not result in wasteful, inefficient, or unnecessary consumption of energy, given (1) the relatively small size of the project: a 9600 sq. ft. office/vehicle/equipment maintenance facility for the NUSD (which would replace similar uses now operating elsewhere in Novato), and (2) Project compliance with State of California energy conservation regulations, and City of Novato General Plan 2035 energy conservation policies (see Item b discussion below). Therefore, this impact would be **less than significant**.
- b) The State Building Standards Commission adopted updates to the California Green Building Standards Code (CALGreen), which went into effect in January 2011. CALGreen contains requirements for construction site selection, storm water control during construction, construction waste reduction, indoor water use reduction, material selection, natural resource conservation, and site irrigation conservation. CALGreen provides for design options allowing the designer to determine how best to achieve compliance for a given site or building condition. CALGreen also requires building commissioning, which is a process for verifying that all building systems, like heating and cooling equipment and lighting systems, are functioning at their maximum efficiency. CALGreen provides the minimum standard that buildings need to meet in order to be certified for occupancy, but does not prevent a local jurisdiction from adopting more stringent requirements. CALGreen is intended to (1) reduce GHG emissions from buildings; (2) promote environmentally responsible, cost-effective, healthier places to live and work; and (3) reduce energy and water consumption.

The *Novato General Plan 2035* contains the following policies regarding energy efficiency. (Although the site has been withdrawn from City jurisdiction, conformance with City policies may be used in developing CEQA significance criteria.):

- **EL 25a: Reduce Resource Use in Buildings.** Require new development to minimize impacts on the environment, including use of energy and water-efficient design features and materials consistent with local building codes and Water District regulations
- **EL 25b: Green Building Regulations.** Adopt green building regulations that exceed minimum code requirements when found to be cost-effective for long-term building operations.

The Project would be built on accord with California's CALGreen standards and, thus, would not conflict with *Novato General Plan 2035* energy conservation policies. Therefore, this impact would be **less than significant**.

VII. Geology and Soils

Would the Project:

Environmental Issue	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map, issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.				X
ii) Strong seismic ground shaking?		X		
iii) Seismic-related ground failure, including liquefaction?		X		
iv) Landslides?				X
b) Result in substantial soil erosion or the loss of topsoil?			X	
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?		X		
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?			X	

Environmental Issue	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of wastewater?				X
f) Directly or indirectly destroy a unique paleontological resource or site, or unique geologic feature?				X

Background

This analysis considers the project’s potential impacts on unique paleontological resources unique geologic features on the project site.

A geotechnical study of the site was prepared for the site by Miller Pacific Engineering Group (Miller Pacific Engineering Group, *Geotechnical investigation, Novato Unified School District- Maintenance Operations and Transportation Building, Novato, California, January 11, 2019*). The discussions below are based on the findings of that study.

Geologic Conditions

Regional geologic mapping indicates that the site is underlain by Holocene alluvial deposits, which typically consist of moderately consolidated clay, silt, and gravel. The hills surrounding the site are composed of sandstone and shale. The site had previously been used for a building at the old Hamilton Air Force Base. The building and its foundations have been removed, and most of the site has been covered with a layer of crushed gravel approximately one foot deep, placed after the building was removed.

Three exploratory soil borings have been conducted on the site to determine subsurface geologic conditions. The subsurface conditions below the gravel layer reflect the regional geologic conditions; a two- to four-foot layer of clayey gravel fill, most likely placed when the removed building was constructed. underlies the gravel. Interbedded alluvial deposits variously composed of silty and clayey sands underlie the fill to a depth of about 12-15 feet below the ground surface, beyond which bedrock was encountered. Groundwater was encountered between 2 and 18 feet below the ground surface.

Seismic Conditions

The site is located in the seismically active San Francisco Bay Area. While no faults underlie the site, nearby active faults include the Hayward Fault, approximately 7 miles east of the site; the

Rogers Creek Fault, about 9 miles northeast of the site, the San Andreas Fault, about 12.5 miles west of the site, and the San Gregorio fault, about 14 miles southwest of the site. Major earthquakes potentially affecting the project site are possible on all of these faults. Due to their proximity to the site, the Hayward and Rogers Creek faults have the greatest likelihood of generating strong seismic shaking on the site. Studies indicate that the highest probability of a Richter Magnitude 6.7 or above earthquake in the Bay Area would be on those two faults, with a 33% likelihood of a major earthquake by 2043.

Discussion

a) i. Based on available published geologic information, the project site is not located within an Alquist Priolo Earthquake Fault Zone. The potential for fault rupture on the site is therefore considered to be low and *no impact* would occur. (Miller Pacific, 2019)

ii. The site would be subject to moderate-to-strong ground shaking in the event of a major earthquake on any of the regional fault zones, with peak ground acceleration ranging from about 0.16 g to 0.44 g (one “g” is the force of gravity). This shaking could damage improperly constructed buildings and cause ground failures that also could affect the structure and infrastructure (these ground failures are discussed below). This impact is *potentially significant* but can be reduced to a *less-than-significant* level with implementation of Mitigation Measure GEO-1, below.

iii. Miller Pacific conducted a liquefaction analysis of the soils underlying the site. That investigation determined that a potentially liquefiable sandy layer exists below the site, and liquefaction in a major earthquake could result in about 2.5 inches of total settlement on the site, with 1.3 inches of differential settlement over a 30-foot span. Miller Pacific concluded that “liquefaction presents a moderate-to-high risk of damage to the planned improvements”, although they do not anticipate liquefaction to occur near the surface.

Miller Pacific did not find any potential for significant seismically induced ground settlement on the site, other than that related to subsurface liquefaction. Similarly, the lack of open exposed faces such as steep slopes or channel banks results in a low potential for ground lurching, cracking, or lateral spreading. Therefore these impacts would *be less than significant*.

The **potentially significant impact** associated with liquefaction hazards would be reduced to a **less-than-significant** level by implementation of Mitigation Measure GEO-2, below.

iv. The nearly level site does not contain any slopes that would be subject to landslide hazards.

- b) The site is generally flat and mostly covered by crushed gravel, which is not susceptible to erosion. After project construction, runoff from the site would be increased and, if discharges to open ground are concentrated, some erosion could occur. All project runoff would be directed to existing City storm drain systems, therefore this impact is considered **less than significant**.
- c) Please see response to item a) iii, above. This impact would be reduced to a **less-than-significant** level by implementation of Mitigation Measure GEO-2, below.
- d) Expansive soils shrink and swell with fluctuations in moisture content and are capable of exerting significant expansion pressures on building foundations, interior floor slabs, and exterior flatwork. Distress from expansive soil movement can include cracking of brittle wall coverings (stucco, plaster, drywall, etc.), cracked door and/or window frames, and uneven floors and cracked slabs. Flatwork, pavements, and concrete slabs-on-grade are particularly vulnerable to damage from soil swelling and shrinking highly plastic and/or expansive soils were not observed by Miller Pacific within the upper 5-feet during our subsurface exploration. Therefore, Miller Pacific determined that the risk of expansive soil affecting the proposed improvements is low. (Miller Pacific 2019). The impact would be **less than significant**.
- e) The proposed project would be served by the City's sewer system and would not include any septic systems. Therefore, **no impact** would occur with respect to adequacy of site soils for septic systems.
- f) Archival research indicates that no paleontological resources have been documented within or adjacent to the project site and it is unlikely that such resources would be encountered as a result of project ground-disturbing activities. A search of the University of California Museum of Paleontology (UCMP) on-line data base indicates that the closest finds of paleontological remains in Marin County occurred somewhere along San Antonio Creek which, at a minimum, is located approximately 4 miles north of the project site. Several finds of Mammoth (*Mammoth primigenius*) and Mastodon (*Mammot americanum*), were made along the creek in 1928 but no additional details of the find's specific location(s) appears to have been document. In general, paleontological finds in the region consist largely of bivalves, gastropods, and other invertebrates located in ocean-side erosional contexts in places such as Drakes Bay, Tomales Point, Bolinas Bay, Point Reyes, and Kehoe Beach, and not inland where the project site is located. In addition, the entire project site is located on recent Quaternary alluvial deposits which do not constitute a unique geologic feature and no such features or formations are known to be present in the immediate area. **No impact** would occur.

Mitigation Measures

Mitigation Measure GEO-1: The project structures and foundations shall be designed in accordance with the most recent version (2016) of the California Building Code. Recommended seismic coefficients are provided in Section 5.2 of the Miller Pacific report shall be included in the project design.

Mitigation Measure GEO-2: The building's foundation systems shall be designed to withstand up to 2.5-inches of total and 1.3 of differential settlement, over a 30-foot span. Foundation design criteria to mitigate the effects of liquefaction provided in Section 5.4 of the Miller Pacific report shall be incorporated into the project design.

VIII. Greenhouse Gas Emissions

Would the Project:

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

Background

Greenhouse gases (GHGs) are atmospheric gases that capture and retain a portion of the heat radiated from the earth after it has been heated by the sun. The primary GHGs are carbon dioxide (CO₂), methane (CH₄), and nitrous oxide (N₂O), ozone, and water vapor. While GHGs are natural components of the atmosphere, CO₂, CH₄, and N₂O, are also emitted in substantial quantities from human activities and their accumulation in the atmosphere over the past 200 years has substantially increased their concentrations. This accumulation of GHGs has been implicated as the driving force behind global climate change.

Human emissions of CO₂ are largely by-products of fossil fuel combustion, whereas CH₄ results from off-gassing associated with organic decay processes in agriculture, landfills, etc. Other GHGs, including hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride, are generated by certain industrial processes. The global warming potential of GHGs are typically reported in comparison to that of CO₂, the most common and influential GHG, in units of “carbon dioxide-equivalents” (CO₂e).

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

Discussion

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

(i.e., 1,100 metric tons of CO₂e per year, which is also considered the definition of a cumulatively considerable contribution to the global GHG burden and, therefore, of a significant cumulative impact), but has not defined thresholds for project construction GHG emissions. The *Guidelines* methodology and thresholds of significance have been used in this Initial Study’s analysis of potential GHG impacts associated with the Project.

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

The estimated construction GHG emissions are 139.6 metric tons of CO₂e (for which there is no BAAQMD CEQA significance threshold). The Project’s estimated operational GHG emissions are presented in Table GHG-1. The Project’s GHG operational emissions would be 106.0 metric tons per year, which is substantially below the BAAQMD threshold of 1100 metric tons. Therefore, this impact would be **less than significant**.

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

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

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

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

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

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

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

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

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

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

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

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

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

IX. Hazards and Hazardous Materials

Would the Project:

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

Background

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

Groundwater and Soil Contamination and Remediation

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

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

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

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

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

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

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

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

Land Use Restrictions

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

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

Discussion

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

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

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

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

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

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

X. Hydrology and Water Quality

Would the Project:

Environmental Issue	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?		X		
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?				X
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would: <ul style="list-style-type: none"> 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 flood flows? 		X		
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?				X
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?				X

Discussion

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Mitigation Measures

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

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

X. Land Use and Planning

Would the Project:

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

Discussion

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

XI. Mineral Resources

Would the Project:

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

Discussion

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

XIII. Noise

Would the Project result in:

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

Background

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

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

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

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

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

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

The unit of measurement for table entries is the **decibel (dB)**, the standard measure of a sound’s loudness relative to the human threshold of perception. Decibels are said to be **A-weighted (dBA)** when corrections are made to a sound’s frequency components during a measurement to reflect the known, varying sensitivity of the human ear to different frequencies. The **Equivalent Sound Level (L_{eq})** is a constant sound level that carries the same sound energy as the actual time-varying sound over the measurement period. **Statistical Sound Levels - L_{min}, L₉₀, L₁₀ and L_{max}** - are the minimum sound level, the sound level exceeded 90 percent of the time, the sound level exceeded 10 percent of the time and the maximum sound level, respectively; all as recorded during the **sampling times**, which for the two cases above was **ten minutes**.

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

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

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

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

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

- For Schools and Libraries:
Normally Acceptable – $L_{dn} < 65$ dBA
Conditionally Acceptable – $L_{dn} > 65$ dBA, but < 80 dBA
Unacceptable – $L_{dn} > 80$ dBA

The *Novato General Plan 2035* (Chapter 4, *Living Well*, Section 5 *Noise*) presents 24-hour average noise contours (using the L_{dn} metric²) for Highway 101 and Novato’s major streets (see Figure LW-3, *Existing Vehicular Noise Contours*). At the Project site’s location about 1000 feet from Highway 101 and just south of State Access Road, it appears that noise levels on site are in the low to mid-60s dBA Ldn. Thus, the proposed Project’s office/vehicular maintenance uses’ exposure to ambient noise (in this case, mostly from local motor vehicle traffic) would be compatible with the noise exposure standards set by the General Plan.

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

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

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

Discussion

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

Incremental Noise from Construction

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

²Ldn, is a 24-hour average sound level (Leq) with a 10-decibel “penalty” added to sound levels occurring at night between 10:00 p.m. and 7:00 a.m.

Table NOI-2: Modeled Project Construction Noise Levels

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

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

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

Incremental Noise from Project Operation

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

Mitigation Measures

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

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

- Provide sound-control devices on equipment no less effective than those provided by the manufacturer.
- Locate stationary equipment, material stockpiles, and vehicle staging areas as far as practicable from sensitive receptors.
- Prohibit unnecessary idling of internal combustion engines.
- Require applicable construction-related vehicles and equipment to use designated truck routes when entering/leaving the site.
- Designate a noise disturbance coordinator at NUSD who shall be responsible for responding to complaints about noise during construction. The telephone number of the noise disturbance coordinator shall be conspicuously posted at the construction site. Copies of the project purpose, description and construction schedule shall also be distributed to the surrounding residences, schools and library.

- b) There are no policies or standards in the *Novato General Plan 2035* for avoiding/reducing structural damage or annoyance from vibration impacts. However, it is most common for government agencies to rely on assessment methodologies, impact standards and vibration-reduction strategies developed by the Federal Transit Administration (FTA). According to the FTA, limiting vibration levels to 94 vibration decibels (VdB, a measure of vibration intensity similar to the dB for noise) or less would avoid structural damage to wood and masonry buildings (which are typical of most residential structures), while limiting vibration levels to 80 VdB or less at residential locations would avoid significant annoyance to the occupants.

The most vibration-intensive piece of construction equipment is a pile driver, but no pile driving will be required for the Project. Other types of construction equipment are far less vibration-intensive. Next in intensity are heavily loaded trucks or large tracked earth-moving equipment, which could pose a damage or annoyance threat if they regularly and often come within 25 feet of a vibration-sensitive receptor during construction. But the closest existing vibration-sensitive uses to the Project construction sites are about 200 feet away. Thus, the potential for vibration annoyance/damage is **less than significant**.

- c) The Project site is about 6 miles south of Gness Field, a private aviation facility operated by the Marin County Department of Public Works. The *Novato General Plan 2035* (Chapter 4, *Living Well*, Section 5 *Noise*) presents noise contours for Gness Field (see Figure LW-5, *Existing Noise Contours for Gness Field Airport*). The Airport's 65 dBA contour (the common federal measure of significant impact from aircraft noise) closely follows (and is just outside) the Airport property and also comes no closer than about 6 miles from the Project site. Thus, the potential for annoyance to future Project site occupants from aircraft operation out of Gness Field Airport is **less than significant**.

XIII. Population and Housing

Would the Project:

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

Discussion

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

XIV. Public Services

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

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

Discussion

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

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

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

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

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

XV. Recreation

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

Discussion

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

XVII. Transportation/Traffic

Would the Project:

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

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

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

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

c) Gness Field, the Marin County owned and run airport is located approximately 7 miles north of the Project site. The proposed Project would not extend into the protected air space, would not create aviation safety hazards for persons residing or working in the Project vicinity, and would not be subject to airport noise issues. Therefore, it would have **no impact** on air traffic patterns.

e) The Projects have been designed to allow adequate emergency access. The City of Novato Fire Protection District (NFPD) would review the Project plans for adequacy of emergency access. Any temporary lane closures during project construction would be subject to City of Novato review approval. Therefore, the Project would include adequate emergency access to the site and surrounding area. Impacts would be **less thansignificant**.

f) The Project would have no effect on existing bus, bicycle and pedestrian access, therefore it would not conflict with any adopted plans, policies, or programs that address alternative transportation, and there would be **no impact**.

XVIII. Tribal Cultural Resources

Would the project:

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

Background

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

Discussion

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

The NAHC also forwarded a list of appropriate Native American tribal contacts. These consisted of Mr. Gene Buvelot, of the Federated Indians of Graton Rancheria, and Mr. Greg Sarris, Chairman of the Federated Indians of Graton Rancheria. SAS sent contact letters to both Mr. Buvelot, and Mr. Sarris on February 16, 2019. SAS continued to engage the Graton Rancheria by emailing Mr. Buvelot, Mr. Sarris, Buffy McQuillen (Tribal Historic Preservation Officer), and Antonette Tomic on February 22, 2019. On March 1, 2019, SAS telephoned and left voicemails for Mr. Buvelot, Mr. Sarris, and Ms. McQuillen. On April 24, Ms. McQuillen sent a request to the NUSD for formal consultation. The District responded by letter and email on May 13 and May 17, 2019 offering to meet and visit the site. A response was received by the District on May 28, 2019 inviting the District to a consultation meeting at Tribal Office in Rohnert Park on June 4, 2019. The District attended this meeting. Due to the outcome of the meeting and because **Mitigation Measures CULT-1, -2, and -3** identified on page 35 of this document would already be implemented to address impacts on cultural resources, potential tribal cultural resource impacts would be **less than significant**. Please refer to the email in Appendix A from the Tribe dated June 20, 2019 stating that the Tribe's concerns have been met.

XVII. Utilities and Service Systems

Would the Project:

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

Background

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

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

Discussion

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

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

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

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

XX. Wildfire Hazards

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

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

Discussion

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

IV. MANDATORY FINDINGS OF SIGNIFICANCE

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

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

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

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

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

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

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

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

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

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

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

V. REFERENCES

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VI. REPORT PREPARERS

Novato Unified School District

Michael Woolard, Executive Director of Facilities

Grassetti Environmental Consulting

Richard Grassetti, Principal

Deborah Holley, Holley Consulting, Planner

Geoff Hornek, Air Quality, GHG, and Noise Specialists

Vollmar Consulting, Biological Resources Specialists

Jason Coleman, Solano Archaeological Services, Cultural and Tribal Resources

Richard Denney, Graphics

Greystone West Company

Todd Lee, Principal

Courtney Smith, Project Administrator

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

**Native American Heritage Commission
Native American Contacts List
2/13/2019**

Gene Buvelot
6400 Redwood Drive, Ste 300
Rohnert Park 94928
(415) 279-4844 Cell
Coast Miwok
,CA Southern Pomo
gbuvelot@gratonrancheria.com
(707) 566-2288 ext 103

Federated Indians of Graton Rancheria
Greg Sarris, Chairperson
6400 Redwood Drive, Ste 300
Rohnert Park 94928
(707) 566-2288 Office
Coast Miwok
,CA Southern Pomo
gbuvelot@gratonrancheria.com
(707) 566-2291 Fax
Federated Indians of Graton Rancheria

131 Sunset Avenue, Suite E # 120
Suisun, CA 94585-2064



707-718-1416 • Fax 707-451-4775
www.solanoarchaeology.com

February 15, 2019

Federated Indians of Graton Rancheria
Attn. Gene Buvelot
6400 Redwood Drive, Ste. 300
Rohnert Park, CA 94928

Dear Mr. Buvelot:

Grassetti Environmental Consultants, Inc. has recently retained Solano Archaeological Services (SAS) to conduct a CEQA level cultural resources inventory of an approximate 3.27-acre project area located in Marin County, for the proposed Novato Unified School District (NUSD) Ground, Maintenance, and Operations (GMO) Building Project (Project).

The proposed NUSD GMO Building Project proposes to construct an approximate 8500 square foot building and associated parking infrastructure (30,300 square feet) to be used for operations and maintenance by the NUSD.

The project is located at the corner of State Access Road and C Street in an area once formally part of Hamilton Air Force Base, approximately 3.5 miles southeast from the City of Novato. The project area also lies in the *San Jose (Pacheco)* land grant, with an approximated Township and Range of 3 North and 6 West, as depicted on the Novato, California USGS 7.5' topographic quadrangle map (see attached maps).

The archaeological records search at the Northwest Information System at Sonoma California State University indicated that no cultural resources have been previously recorded in the project area. Additionally, the survey results were negative, and the project area now consists of a partially built environment consisting of graveled lots, modern landscaping, and building debris from a demolished warehouse that once stood on the parcel. The Native American Heritage Commission (NAHC), however, identified a Sacred Land resource in the vicinity of the involved property, and indicated that SAS should contact the Federated Indians of Graton Rancheria for help identifying the resource type and location. Any help here would be greatly appreciated.

On behalf of the NUSD, SAS is facilitating AB 52 consultation for this Project. As SAS cannot wholly replace the NUSD from its AB 52 consultation responsibilities, we are simply writing to introduce the Project to you, and gather any information on undocumented sites that may exist in the project area. Additionally, if you have any official recommendations you would like to make in regards to the Project and its undertaking, or have any questions about the Project, please feel free to contact us. Thank you in advance for your time.

Sincerely,

Jason Coleman
Principal Investigator and Owner

Enc. USGS topographic map



February 15, 2019

Federated Indians of Graton Rancheria
Attn. Greg Sarris, Chairman
6400 Redwood Drive, Ste. 300
Rohnert Park, CA 94928

Dear Mr. Sarris:

Grassetti Environmental Consultants, Inc. has recently retained Solano Archaeological Services (SAS) to conduct a CEQA level cultural resources inventory of an approximate 3.27-acre project area located in Marin County, for the proposed Novato Unified School District (NUSD) Ground, Maintenance, and Operations (GMO) Building Project (Project).

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The project is located at the corner of State Access Road and C Street in an area once formally part of Hamilton Air Force Base, approximately 3.5 miles southeast from the City of Novato. The project area also lies in the *San Jose (Pacheco)* land grant, with an approximated Township and Range of 3 North and 6 West, as depicted on the Novato, California USGS 7.5' topographic quadrangle map (see attached maps).

The archaeological records search at the Northwest Information System at Sonoma California State University indicated that no cultural resources have been previously recorded in the project area. Additionally, the survey results were negative, and the project area now consists of a partially built environment consisting of graveled lots, modern landscaping, and building debris from a demolished warehouse that once stood on the parcel. The Native American Heritage Commission (NAHC), however, identified a Sacred Land resource in the vicinity of the involved property, and indicated that SAS should contact the Federated Indians of Graton Rancheria for help identifying the resource type and location. Any help here would be greatly appreciated.

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Sincerely,

Jason Coleman
Principal Investigator and Owner

Enc. USGS topographic map

NATIVE AMERICAN HERITAGE COMMISSION
Cultural and Environmental Department
1550 Harbor Blvd., Suite 100
West Sacramento, CA 95691
Phone: (916) 373-3710
Website: <http://www.nahc.ca.gov>



February 13, 2019

Jason Coleman
Solano Archaeological Services

Sent by Email: Jason@solanoarchaeology.com

RE: Novato Unified School District (NUSD) GMO Project, Novato, Marin County

Dear Mr. Coleman:

A record search of the Native American Heritage Commission (NAHC) Sacred Lands File (SLF) was completed for the information you have submitted for the above referenced project. **The results were positive.** Please contact the Federated Indians of Graton Rancheria on the attached list for more information. Other sources of cultural resources should also be contacted for information regarding known and recorded sites.

Attached is a list of Native American tribes who may also have knowledge of cultural resources in the project area. This list should provide a starting place in locating areas of potential adverse impact within the proposed project area. **I suggest you contact all of those on the list; if they cannot supply information, they might recommend others with specific knowledge.**

By contacting all those listed, your organization will be better able to respond to claims of failure to consult with the appropriate tribe. If a response has not been received within two weeks of notification, the Commission requests that you follow-up with a telephone call or email to ensure that the project information has been received.

If you receive notification of change of addresses and phone numbers from tribes, please notify the NAHC. With your assistance, we can assure that our lists contain current information. If you have any questions or need additional information, please contact me at my email address: Sharaya.Souza@NAHC.ca.gov or directly at (916) 573-0168.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Sharaya Souza'.

Sharaya Souza
Associate Governmental Program Analyst

Attachment

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

**NATIVE AMERICAN CONSULTATION LOG FOR
NUSD GMO BUILDING PROJECT,
MARIN COUNTY, CALIFORNIA**

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

Native American Consultant	Date of Correspondence	Responses
Gene Buvelot	2/15/19	Mailed an introduction letter and two maps depicting the project area.
	2/22/19	SAS emailed reiterating the project letter and re-submitting the Project maps, and asked is SAS could answer any questions.
	3/1/19	Telephoned, left voicemail for Mr. Buvelot.
Buffy McQuillen, THPO	2/22/19	SAS emailed reiterating the project letter and re-submitting the Project maps, and asked is SAS could answer any questions.
	3/1/19	Left voicemail introducing the project, and asked for information on the sacred land identified by the NAHC.
	3/4/19	Ms. McQuillen called and asked for project information. SAS emailed out the introduction letter, maps, and the NAHC response the same day and asked for information on the site identified by the NAHC.
Greg Sarris	2/15/19	Mailed an introduction letter and two maps depicting the project area.
	2/22/19	SAS emailed reiterating the project letter and re-submitting the Project maps, and asked is SAS could answer any questions.
	3/1/19	Mr. Sarris' receptionist Marianne forwarded SAS telephone call to Buffy McQuillen.
Antonette Tomic	2/22/19	SAS emailed reiterating the project letter and re-submitting the Project maps, and asked is SAS could answer any questions.

From: THPO@gratonrancheria.com <THPO@gratonrancheria.com>

Sent: Thursday, April 25, 2019 9:37 AM

To: Jason Coleman <jason@solanoarchaeology.com>; MICHAEL WOOLARD <MWoolard@nUSD.org>

Subject: Novato Unified School District, Grounds Maintenance and Operations Building Project

Dear Mike Woolard,

Please see the attached AB 52 letter regarding the Novato Unified School District, Grounds Maintenance and Operations Building Project. If you have any questions regarding this letter please feel free to email my office at thpo@gratonrancheria.com or call the office at (707) 566-2288. Thank you.

Sincerely,

Buffy McQuillen

Tribal Heritage Preservation Officer (THPO)

Native American Graves Protection and Repatriation Act (NAGPRA)

Office: 707.566.2288; ext. 137

Cell: 707.318.0485

FAX: 707.566.2291

Antonette Tomic

THPO Administrative Assistant

Federated Indians of Graton Rancheria

6400 Redwood Drive, Suite 300

Rohnert Park, CA 94928

Office: 707.566.2288, ext. 143

Fax: 707.566.2291

atomic@gratonrancheria.com



Submitted via electronic email: Mike Woolard (mwoolard@nUSD.org)

April 24, 2019

RE: Formal Request for Tribal Consultation Pursuant to the California Environmental Quality Act (CEQA), Public Resources Code section 21080.3.1, subs. (b), (d) and (e) for the Novato Unified School District, Grounds Maintenance and Operations Building.

Dear Agency Representative:

This letter constitutes a formal request for tribal consultation under the provisions of the California Environmental Quality Act (CEQA) (Public Resources Code section 21080.3.1 subdivisions (b), (d) and (e) for the mitigation of potential project impacts to tribal cultural resource for a project within the Federated Indians of Graton Rancheria's ancestral lands.

Receiving this letter sets forth the Tribe's formal request for consultation on the following topics checked below, which shall be included in consultation if requested (Public Resources Code section 21080.3.2, subd. (a):

- Alternatives to the project
- Recommended mitigation measures
- Significant effects of the project

The Tribe also requests consultation on the following discretionary topics checked below (Public Resources Code section 21080.3.2, subd. (a):

- Type of environmental review necessary
- Significance of tribal cultural resources, including any regulations, policies or standards used by your agency to determine significance of tribal cultural resources
- Significance of the project's impacts on tribal cultural resources
- Project alternatives and/or appropriate measures for preservation or mitigation that we may recommend, including, but not limited to:

- (1) Avoidance and preservation of the resources in place, pursuant to Public Resources Code section 21084.3, including, but not limited to, planning and construction to avoid the resources and protect the cultural and natural context, or planning greenspace, parks or other open space, to incorporate the resources with culturally appropriate protection and management criteria;
- (2) Treating the resources with culturally appropriate dignity taking into account the tribal cultural values and meaning of the resources, including but not limited to the following:
 - a. Protecting the cultural character and integrity of the resource;



- b. Protection the traditional use of the resource; and
 - c. Protecting the confidentiality of the resource.
- (3) Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
- (4) Protecting the resource.

Additionally, the Tribe would like to receive any cultural resources assessments or other assessments that have been completed on all or part of the project's potential "area of project effect" (APE), including, but not limited to:

- 1). The results of any record search(es) conducted at an archaeological information center of the California Historical Resources Information System (CHRIS), including, but not limited to:
 - (a) Any known cultural resources that have already been recorded on or adjacent to the potential APE;
 - (b) Whether the probability is low, moderate or high that cultural resources are located in the potential APE; and
 - (c) If a survey is required to determine whether previously unrecorded cultural resources are present in the potential APE.
- 2). The results of any archaeological inventory survey that was conducted of all or part of the potential APE, including, but not limited to:
 - (a) Any report that may contain site forms, site significance, and suggested mitigation measures.
- 3). The results of any Sacred Lands File searches conducted through the Native American Heritage Commission for all or part of the potential APE;
- 4). Any ethnographic studies conducted for any area including all or part of the potential APE; and
- 5) Any geotechnical reports regarding all or part of the potential APE.

We would like to remind your agency that CEQA Guidelines section 15126.4, subdivision (b)(3) states that preservation in place is the preferred manner of mitigating impacts to archaeological sites. Section 15126.4, subd. (b)(3) of the CEQA Guidelines has been interpreted by the California Court of Appeal to mean that "feasible preservation in place must be adopted to mitigate impacts to historical resources of an archaeological nature unless the lead agency determines that another form of mitigation is available and provides superior mitigation of impacts." *Madera Oversight Coalition v. County of Madera* (2011) 199 Cal.App.4th 48, disapproved on other grounds, *Neighbors for Smart Rail v. Exposition Metro Line Construction Authority* (2013) 57 Cal.4th 439.



The Tribe would like to begin consultation within 30 days of your receipt of this letter. Please contact my office at (707) 566-2288 or by email at bmcquillen@gratonrancheria.com as the person who will serve as the lead contact on behalf of the Tribe.

Sincerely,

A handwritten signature in black ink, appearing to read "Buffy McQuillen". The signature is fluid and cursive, written over a light blue horizontal line.

Buffy McQuillen, THPO/NAGPRA
Federated Indians of Graton Rancheria



NOVATO UNIFIED SCHOOL DISTRICT

1015 Seventh Street • Novato • CA • 94945 • nusd.org

Mike Woolard
Executive Director of Facilities

Jim Hogeboom
Superintendent

Ms. Buffy McQuillen
Tribal Heritage Preservation Office (THPO)
Native American Graves Protection and Repatriation Act (NAGPRA)
Federated Indians of Graton Rancheria
6400 Redwood Drive, Suite 300
Rohnert Park, CA 94928
bmcquillen@gratonrancheria.com

RE: TRIBAL CONSULTATION UNDER THE CALIFORNIA ENVIRONMENTAL QUALITY ACT, AB 52 – Formal Notification of determination that a Project Application is Complete and Notification of Consultation Opportunity, pursuant to Public Resources Code § 21080.3.1 (hereafter PRC).

Dear Ms. McQuillen,

The Novato Unified School District has determined that a project application is complete for the **Proposed Novato Unified School District Grounds Maintenance and Operations Building**. Below please find a description of the proposed project, a map showing the project location, and the name of our project point of contact, pursuant to PRC § 21080.3.1 (d). We are also attaching the Draft Initial Study prepared for the project, which includes additional detail regarding the project.

Project Location. The project site is located in the Hamilton neighborhood within the City of Novato, in Marin County, east of Highway 101 and south of Highway 37. (See Figure 1). The project is proposed on a 2.67-acre parcel at the southwest corner of State Access Road (also known as Hamilton Parkway) and "C" Street. Local access to the site is provided by C Street from State Access Road. Regionally, the project site is accessed from US Highway 101, via Nave Drive and Main Gate Road.

Project Site History and Existing Conditions and Land Uses. The proposed new building and parking lot would be constructed on a 2.67-acre, mostly vacant site that had, up until 2012 contained a 41,140 square-foot warehouse building that was originally constructed in 1975. The project site is the northern portion of a larger parcel, totaling 9.2 acres conveyed to the District under a program established by the Department of Defense through the United States Department of Education.

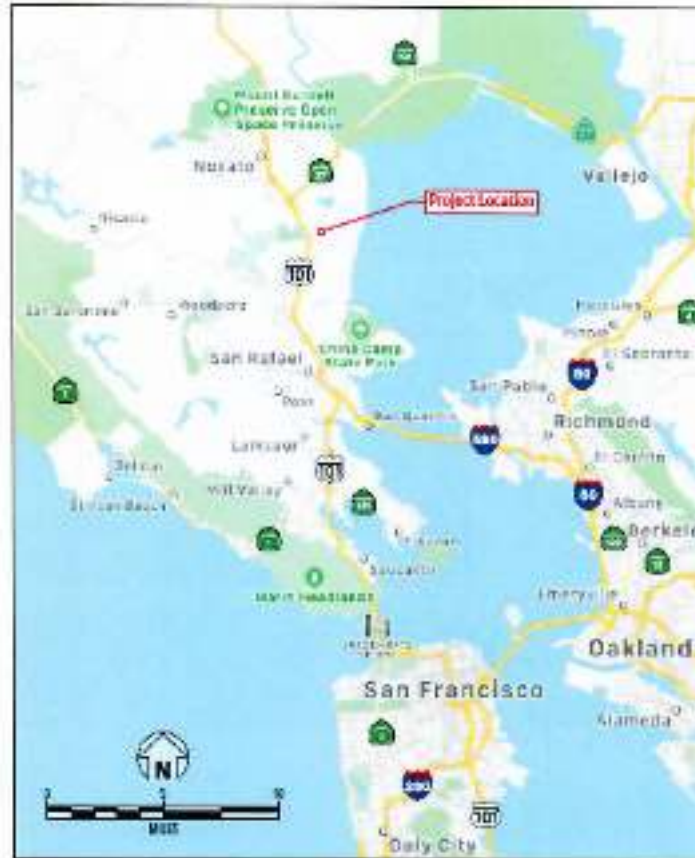


Figure 1
Project Location

Source: Google Maps and Google Earth

Project Description. The proposed Grounds, Maintenance, and Operations (GMO) building includes construction of a 9,600 square foot, one-story, 17' 3"-foot-high GMO building and associated improvements. The building dimensions would be approximately 60 by 160 feet and would contain three large shop spaces, two small offices, a meeting room, kitchen, locker room, shower, restroom, and file room. The building would house 15 employees. Associated improvements include a 50,300 square foot parking lot measuring 212 by 134 feet, storage areas, a dumpster enclosure, landscaping, and utilities. An existing loading dock at the northwest corner of the site will be retained and used by the project.

Project Point of Contact.

Mike Woolard,
Mr. Mike Woolard, Executive Director of Facilities
Novato Unified School District
1015 Seventh Street
Novato, CA 94945
(415) 415-493-4588
mwoolard@nUSD.org

Pursuant to PRC § 21080.3.1 (b), you have 30 days from the receipt of this letter to request consultation, in writing, with the Novato Unified School District.

Respectfully,



Mr. Mike Woolard, Executive Director of Facilities

Mike Woolard
Executive Director of Facilities
Novato Unified School District
(415) 493-4588

Attachment: Draft Initial Study for the Proposed Novato Unified School District
Grounds Maintenance and Operations Building, March 12, 2019

From: Buffy McQuillen <BMcQuillen@gratonrancheria.com>
Sent: Tuesday, May 28, 2019 8:37 AM
To: MICHAEL WOOLARD <MWoolard@nUSD.org>; THPO@gratonrancheria.com
Cc: Todd Lee <tlee@greystonewest.com>; Courtney Smith <courtney@greystonewest.com>;
deborah@holleyconsulting.com; Jason Coleman <jason@solanoarchaeology.com>; YANCY HAWKINS
<YHAWKINS@nUSD.org>
Subject: RE: NUSD Grounds, Maintenance & Operations Building Project - AB52 Ltr

Hi Mr. Woolard,

Thank you for the invitation to do a field visit. As a starting point though we would like to meet in person at the Tribal Office in Rohnert Park. I have an opening in my schedule on June 4, 2019 at 10am. For a consultation meeting you should plan to bring the documents we requested in our AB 52 response.

Sincerely,
Buffy McQuillen
Tribal Heritage Preservation Officer (THPO)
Native American Graves Protection and Repatriation Act (NAGPRA)
Federated Indians of Graton Rancheria
6400 Redwood Drive, Suite 300
Rohnert Park, CA 94928
Office: 707.566.2288; ext. 137
Cell: 707.318.0485
FAX: 707.566.2291
bmcquillen@gratonrancheria.com

Federated Indians of Graton Rancheria: Proprietary and Confidential

Confidentiality Notice: This transmittal is a confidential communication or may otherwise be privileged. If you are not the intended recipient, you are hereby notified that you have received this transmittal in error and that any review, dissemination, distribution or copying of this transmittal is strictly prohibited. If you have received this communication in error, please notify this office and immediately delete this message and all its attachments, if any.

From: MICHAEL WOOLARD [<mailto:MWoolard@nUSD.org>]
Sent: Friday, May 17, 2019 9:43 AM
To: THPO@gratonrancheria.com; Buffy McQuillen <BMcQuillen@gratonrancheria.com>
Cc: Todd Lee <tlee@greystonewest.com>; Courtney Smith <courtney@greystonewest.com>;
deborah@holleyconsulting.com; Jason Coleman <jason@solanoarchaeology.com>; YANCY HAWKINS
<YHAWKINS@nUSD.org>
Subject: NUSD Grounds, Maintenance & Operations Building Project - AB52 Ltr

Ms. McQuillen,

As a follow-up to my response letter, I wanted to once again invite you to a site walk of the project area so we can clearly explain the project scope of work, discuss the facility construction, and hear your specific concerns on potential impacts.

As a mini-review of background information on the site, I wanted to reiterate some project information.

The original development of the site was in the early 1950's, followed by a rebuilding of a new facility in 1975 of a 41,000 square-foot building (Navy Exchange). After many years of use, the building became vacant and the site

underwent hazardous materials remediation, and shortly thereafter the building was demolished and the concrete foundation was rubblized, which left over a foot of gravel on the building footprint. All of these actions resulted in significant disturbance to the site that we are proposing to use for our approximately 11,000 square-foot building.

On page 51 of the Initial Study, it states regarding the proposed construction site, “The deed restrictions include limitations on site excavation of greater than three feet in depth as well as limitations on dewatering and groundwater pumping at the site. The proposed project excavations would not exceed two feet in depth and no dewatering or groundwater pumping is proposed.”

In summary, given the history of site disturbance and the limited excavation required/allowed for this proposed project, it is highly unlikely that the Grounds, Maintenance & Operations Building project would disturb any cultural or archaeological resources. We feel tribal monitoring during construction is reasonable, but believe archaeological testing prior to construction is more site evaluation than is needed given the factors described above.

Thank you for your continued interest in our project, and I look forward to meeting with you at the site to discuss this project in more detail. Please don't hesitate to contact me (mwoolard@nUSD.org or 415-493-4588) with any questions!

Sincerely,
Mike



Mike Woolard, PE

Executive Director of Facilities

415.493.4588 | mwoolard@nUSD.org | www.NUSD.org
1015 7th St, Novato, CA 94945



Ms. McQuillen,

Thanks for the response and invitation to your Tribal Office in Rohnert Park on June 4th! Let me check my schedule for availability and I'll get back to you to verify this meeting.

Sincerely,
Mike



Mike Woolard, PE

Executive Director of Facilities

415.493.4588 | mwoolard@nUSD.org | www.NUSD.org
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From: Buffy McQuillen <BMcQuillen@gratonrancheria.com>
Sent: Tuesday, May 28, 2019 8:37 AM
To: MICHAEL WOOLARD <MWoolard@nUSD.org>; THPO@gratonrancheria.com
Cc: Todd Lee <tlee@greystonewest.com>; Courtney Smith <courtney@greystonewest.com>;
deborah@holleyconsulting.com; Jason Coleman <jason@solanoarchaeology.com>; YANCY HAWKINS
<YHAWKINS@nUSD.org>
Subject: RE: NUSD Grounds, Maintenance & Operations Building Project - AB52 Ltr

Hi Mr. Woolard,

Thank you for the invitation to do a field visit. As a starting point though we would like to meet in person at the Tribal Office in Rohnert Park. I have an opening in my schedule on June 4, 2019 at 10am. For a consultation meeting you should plan to bring the documents we requested in our AB 52 response.

Sincerely,
Buffy McQuillen
Tribal Heritage Preservation Officer (THPO)
Native American Graves Protection and Repatriation Act (NAGPRA)
Federated Indians of Graton Rancheria
6400 Redwood Drive, Suite 300
Rohnert Park, CA 94928
Office: 707.566.2288; ext. 137
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Federated Indians of Graton Rancheria: Proprietary and Confidential

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From: THPO@gratonrancheria.com <THPO@gratonrancheria.com>
Sent: Thursday, June 20, 2019 2:06 PM
To: MICHAEL WOOLARD <MWoolard@nUSD.org>
Subject: RE: NUSD GROUNDS, MAINTENANCE & OPERATIONS PROJECT - DRAFT INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

Hi Michael,

Thank you for providing this updated document for tribal review. At this time we have no concerns with the proposed measures. As long as the document goes forward unchanged we are comfortable concluding this consultation.

Sincerely,
Buffy McQuillen
Tribal Heritage Preservation Officer (THPO)
Native American Graves Protection and Repatriation Act (NAGPRA)
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APPENDIX B: COMMENTS AND RESPONSES ADDENDUM

The Proposed Mitigated Negative Declaration (MND) for the Proposed Novato Unified School District Grounds, Maintenance, and Operations (GMO) Building Project was circulated for public and agency review from March 22 through April 22, 2019. No comments were received and therefore, there were no comment-related changes made to the document.

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

MITIGATION MONITORING AND REPORTING PROGRAM – PROPOSED NOVATO UNIFIED SCHOOL DISTRICT GMO BUILDING PROJECT

When adopting a Mitigated Negative Declaration, CEQA Guidelines Section 15074(d) require that Lead Agencies adopt a program for reporting on or monitoring the changes that it has required in the project or made a condition of approval to mitigate or avoid significant environmental effects.

This monitoring program for mitigation measures identified by the Mitigated Negative Declaration includes:

1. A list of mitigation measures with a space for the completion date;
2. The full text of the mitigation measures; and
3. Monitoring details, including: 1) entity responsible for implementation, 2) timing of implementation and monitoring, and 3) monitoring verification.

Identified Impact	Related Mitigation Measure	MONITORING			VERIFICATION	
		Implementation Entity	Monitoring and Verification Entity	Timing Requirements	Signature	Date

<i>AIR QUALITY</i>						
Construction Emission Impacts	<p>Mitigation Measure AQ-1: The Project construction contractor shall implement the following measures to further reduce construction-related DPM exhaust emissions:</p> <p>All off-road equipment greater than 25 horsepower (hp) and operating for more than 20 total hours over the entire duration of construction activities shall meet the following requirements:</p> <ul style="list-style-type: none"> • All engines shall meet or exceed USEPA/CARB Tier 4 off-road emission standards; <u>or</u> • All engines shall be equipped with a CARB Level 3 Verified Diesel Emissions Control Strategy (VDECS) device. 	NUSD Construction Contractor	NUSD Project Manager	Condition of construction contract; field verify implementation during grading and construction		

Identified Impact	Related Mitigation Measure	MONITORING			VERIFICATION	
		Implementation Entity	Monitoring and Verification Entity	Timing Requirements	Signature	Date
<p>Effects of Tree Removal on Nesting and Roosting Special Status Species</p>	<p>Mitigation BIO-1. Prevent Loss of Active Bird Nests. A pre-construction survey for nesting birds shall be conducted by a qualified biologist within two weeks of construction activities, if activities are to occur within nesting/breeding season of native bird species (February-August). If active nests are identified within 300 feet of construction and would be exposed to prolonged construction-related noise above normal levels, a buffer shall be implemented around nests during the breeding season, or until a biologist determines the young have fledged. The size of the buffer and the type of construction activity will depend on multiple factors including relative change in noise and disturbance during construction activity, amount of vegetative screening between activity and nest, and sensitivity of species.</p> <p>Measure BIO-2: Prevent Loss of Roosting Habitat for Bat Species. The potential of the large trees to provide suitable roosting habitat shall be assessed by a qualified bat biologist, and if necessary, a roosting bat protection plan shall be implemented. If bats are determined to be using the site, minimization measures shall include prohibiting night work activities (between 10pm and</p>	<p>NUSD Construction Contractor</p>	<p>Qualified Biologist and NUSD Project Manager</p>	<p>Condition of construction contract; perform pre-construction survey for nesting birds and roosting habitat within two (2) weeks of construction activity field verify implementation during grading and/or construction</p>		

Identified Impact	Related Mitigation Measure	MONITORING			VERIFICATION	
		Implementation Entity	Monitoring and Verification Entity	Timing Requirements	Signature	Date
	sunrise) and minimizing work activities to outside of the most sensitive breeding (non-volant) period of April to August.					
<i>CULTURAL RESOURCES</i>						
Potential Historic and Archaeological Resource impacts and Potential Disturbance of Buried Human Remains	<p>Mitigation Measure CUL-1: Archaeological Deposits: If archaeological remains are encountered during project activities, project ground disturbances at the find and immediate vicinity shall be halted immediately until a qualified archaeologist can evaluate the finds (§15064.5 [f]). The archaeologist shall examine the finds and recommend mitigation measures which may include documentation in place, avoidance, testing, and/or data recovery.</p>	NUSD Construction Contractor	NUSD Consultant	Condition of construction contract; field verify implementation during grading and/or construction		
	<p>Mitigation Measure CULT-2: Training Session: To ensure that the procedures outlined in Mitigation Measures CULT-1 and CULT-3 are followed during construction, the District shall hold a training session for all Contractor field personnel led by a qualified archaeologist to explain the types of cultural items could be found during construction. The training shall include discussion on the possibility of unearthing human remains, and</p>	NUSD and Construction Contractor	NUSD Consultant	Condition of construction contract, prior to commencement of construction		

Identified Impact	Related Mitigation Measure	MONITORING			VERIFICATION	
		Implementation Entity	Monitoring and Verification Entity	Timing Requirements	Signature	Date
	<p>protocol for ensuring that artifacts, cultural deposits, and/or inhumations are not impacted during construction. The District shall invite the Tribe to attend the training session.</p> <p>Mitigation Measure CUL-3: Human Remains. California law recognizes the need to protect interred human remains, particularly Native American burials and associated items of patrimony, from vandalism and inadvertent destruction. The procedures for the treatment of discovered human remains are contained in California Health and Safety Code Section 7050.5 and Section 7052 and California Public Resources Code Section 5097.</p> <p>In accordance with the California Health and Safety Code, if human remains are uncovered during ground disturbing activities all such activities in the vicinity of the find shall be halted immediately and the District or the District's designated representative shall be notified. The District shall immediately notify the county coroner and a qualified professional archaeologist. The coroner is required to examine all discoveries of human remains</p>	NUSD Construction Contractor	NUSD Consultant	Condition of construction contract, prior to commencement of construction		

Identified Impact	Related Mitigation Measure	MONITORING			VERIFICATION	
		Implementation Entity	Monitoring and Verification Entity	Timing Requirements	Signature	Date
	<p>within 48 hours of receiving notice of a discovery on private or state lands (Health and Safety Code Section 7050.5[b]).</p> <p>If the coroner determines that the remains are those of a Native American, he or she must contact the Native American Heritage Commission (NAHC) by phone within 24 hours of making that determination (Health and Safety Code Section 7050[c]). The responsibilities of the District for acting upon notification of a discovery of Native American human remains are identified in detail in the California Public Resources Code Section 5097.9. The District or their appointed representative and the professional archaeologist will consult with a Most Likely Descendent determined by the NAHC regarding the removal or preservation and avoidance of the remains and determine if additional burials could be present in the vicinity.</p>					

Identified Impact	Related Mitigation Measure	MONITORING			VERIFICATION	
		Implementation Entity	Monitoring and Verification Entity	Timing Requirements	Signature	Date
<i>GEOLOGY AND SOILS</i>						
Potential Fault Rupture, Ground Shaking, and Ground Failure Impacts	<p>Mitigation Measure GEO-1: Design the structures and foundations in accordance with the most recent version (2016) of the California Building Code. Recommended seismic coefficients provided in Section 5.2 of the Miller Pacific Report on file with the District shall be incorporated into the project design.</p> <p>Mitigation GEO-2: The building's foundation systems shall be designed to withstand up to 2.5-inches of total and 1.3 of differential settlement, over a 30-foot span. Foundation design criteria to mitigate the effects of liquefaction provided in Section 5.4 of the Miller Pacific report shall be incorporated into the project design.</p>	NUSD Project Manager	NUSD Project Manager; Miller Pacific	Prior to submittal of final design plans for review by the District		
		Project Civil Engineer or Architect	NUSD Project Manager; Miller Pacific	Prior to submittal of final design plans for review by the District		
<i>HYDROLOGY AND WATER QUALITY</i>						
Impacts on Water Quality and Flood Risk	Mitigation Measure HYD-1: Prior to the issuance of grading permits for the proposed Project, the Project engineers shall prepare a Stormwater Control Plan. The Stormwater Control Plan shall identify pollution prevention measures and practices to prevent polluted runoff from leaving the Project site.	Project Engineers	NUSD Project Manager	Prior to submittal of final design plans for review by the District		
			NUSD	Annually		

Identified Impact	Related Mitigation Measure	MONITORING			VERIFICATION	
		Implementation Entity	Monitoring and Verification Entity	Timing Requirements	Signature	Date
	<p><i>Mitigation Measure HYD-2:</i> The District shall maintain in perpetuity the post-construction BMPs listed in the Stormwater Operations and Management Plan. The District shall make changes or modifications to the BMPs to ensure peak performance. The District shall be responsible for costs incurred in operating, maintaining, repairing, and replacing the BMPs. The District shall conduct inspection and maintenance activities and complete annual reports.</p>	NUSD Project Manager	Project Manager			

<i>NOISE</i>						
<p>Construction Period Noise Impacts</p>	<p><i>Mitigation Measure NOI-1:</i> The following Best Management Practices shall be incorporated into the construction documents to be implemented by the Project contractor:</p> <ul style="list-style-type: none"> • Limit Project construction activity to between 7 a.m. and 6 p.m. on weekdays, to between 10 a.m. and 5 p.m. on Saturdays, and prohibit it on Sundays or official federal national holidays. • Provide enclosures and noise mufflers for stationary equipment, shrouding or shielding for impact tools, and barriers around particularly noisy activity areas on the site. • Use quietest type of construction equipment whenever possible, particularly air compressors. 	<p>NUSD Construction Contractor</p>	<p>NUSD Project Manager</p>	<p>Condition of construction contract; field verify implementation during demolition, grading, and construction</p>		