Environmental Review Record

for the
Drake Avenue Apartments Project

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[1] Excluded from this ERR due to confidentiality.

APPENDIX A

PHASE I ENVIRONMENTAL SITE ASSESSMENT

KCE MATRIX
CONSULTING ENGINEERS
STRUCTURAL, CIVIL & ENVIRONMENTAL

PHASE I ENVIRONMENTAL SITE ASSESSMENT REPORT

Commercial Property
825 Drake Avenue
Sausalito (Marin City), California 94965

Prepared For:

Pacific West Communities, Inc.
430 East State Street, Suite 100
Eagle, Idaho 83616

KCE-2022-459E-R1
February 2, 2023

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I. SUMMARY AND CONCLUSIONS

KCE Matrix, Inc. (KCE Matrix) has been retained by Pacific West Communities, Inc. (referred to as "the client" and/or "the user" in this report) to conduct a Phase I Environmental Site Assessment (ESA) in accordance with the American Society of Testing and Materials (ASTM) standard practice E1527-13 for the property located at 825 Drake Avenue, Sausalito (Marin City), California (referred to as "the subject property" in this report).

The following summarizes the findings of this Phase I ESA:

- The subject property is located within a commercial and residential area on the northern corner of the intersection of Drake Avenue and Park Circle, in Sausalito (Marin City), California. The property consists of approximately 44,250 square feet (1.0 acre) of land area in an irregular-shaped configuration. The site can be accessed from a driveway along Drake Avenue to the south of the property.

- The subject property currently contains a manufactured structure that covers approximately 2,000 square feet of land area in a rectangular-shaped configuration, located on the western portion of the property. A smaller manufactured storage structure is located to the north of the larger structure along the northern property line. A relatively large driveway and/or parking area is located to the east of the structure on the central portion of the property. The eastern portion of the property consists of vacant land with no structures and a dirt and grassy unfinished surface. Relatively recently, the larger manufactured structure on site and the property has been occupied by "Village Baptist Church" until at least 2015 and has been used as office space by a non-profit organization known as The Hannah Project.

- Based on the historic information obtained during this investigation (including research of Sanborn Maps, Aerial Photographs, regulatory records and city directories), several residential structures were located on the property between 1946 and 1958. The subject property was first occupied by the Village Baptist Church in approximately 1958, at a time when the church occupied and used four residential structures that were on site at that time. These residential structures were demolished, and the property was vacant land in 1963. In 1965, the Village Baptist Church subsequently constructed a new facility on the eastern portion of the subject property which served as the primary church facility until October of 1999 when this structure was destroyed by a fire event. As of approximately 2005, it appears that this structure was demolished and removed from the property, and a relatively smaller manufactured structure was erected on the western most portion of the property. The subject property continued to be occupied by the Village Baptist Church until approximately 2015. More recently, the manufactured structure on site has been used as office space by a non-profit organization known as The Hannah Project.

- On January 19, 2023, a representative of KCE Matrix conducted site inspection for the subject property and confirmed that the property currently contains a single-story

manufactured structure located on the western most portion of the property, along with a second smaller manufactured storage structure near and to the north of the larger structure, and the remaining areas consist of a parking lot, and vacant land with no structures.

- As reported in the search of government and regulatory environmental databases and as presented in Section V-A2 and Section VI-D of this report, the subject property is located in a residential and commercial area where information related to environmental assessment, remediation and/or management practices is documented for other properties in the general site vicinity. One of these other sites has been identified as a facility with a historic Underground Storage Tank (UST). It is reported that the UST was removed from this other property. In addition, this other property is located down-gradient and at an elevation that is substantially lower as compared to the subject property. The other sites have been identified as non-generators with no reported violations. Based on the information obtained during this investigation and the site vicinity reconnaissance performed, KCE Matrix did not discover or observe subsurface environmental site assessment activity that would indicate potential migration of contamination from other nearby sites towards the subject property.

- Based on the Vapor Encroachment Screen (VES) conducted during this investigation, a Vapor Encroachment Condition (VEC) originating from the subject property was not identified. Furthermore, based on the research conducted during this investigation, a VEC originating from other nearby sites in the vicinity for the subject property was not identified.

- KCE Matrix conducted a search of groundwater monitoring data as maintained by the State Water Resources Control Board (SWRCB) – Geotracker database for hydrology information for the site and site vicinity. Based on information maintained for a property located 0.13-mile southeast of the subject property, the depth to groundwater was reported to range between 5.81 feet and 11.23 feet below the surface as stated in the Site Closure Summary reported as prepared in July of 2007. Based on monitoring data collected from wells located at a second site that is approximately 0.78-mile northwest of the subject site, the depth to groundwater was reported to range between 3.66 feet and 5.16 feet below the surface as monitored in February of 2004.

The ASTM standard practice E1527-13 defines the following terms:

Recognized Environmental Condition (REC) as “the presence or likely presence of any hazardous substances or petroleum products in, on or at a property: (1) due to release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment”.

Historical Recognized Environmental Condition (HREC) as “a past release of any hazardous substances or petroleum products that has occurred in connection with the property and has been addressed to the satisfaction of the applicable regulatory authority or meeting unrestricted use

criteria as established by the regulatory authority, without subjecting the property to any required controls".

Controlled Recognized Environmental Condition (CREC) as "a recognized environmental condition resulting from a past release of hazardous substances or petroleum products that has been addressed to the satisfaction of the applicable regulatory authority with hazardous substances or petroleum products allowed to remain in place subject to the implementation of required controls".

KCE Matrix has performed a *Phase I Environmental Site Assessment* in conformance with the scope and limitations of ASTM Practice E1527-13 of 825 Drake Avenue, Sausalito (Marin City), California, the subject property. Any exceptions to, or deletions from, this practice are described in this report. This assessment has revealed no evidence of a REC, an HREC or a CREC in connection with the subject property.

II. INTRODUCTION

A. Purpose

This report presents the results of a Phase I ESA conducted by KCE Matrix for the subject property. The purpose of this investigation is to research and report existing environmental conditions for the subject property based on the American Society of Testing and Materials (ASTM) standard practice E1527-13. Performing a Phase I ESA according to the ASTM Standard E1527-13 is intended to permit a user to satisfy one of the requirements in qualifying for the *innocent landowner*, *contiguous property owner*, or *bona fide prospective purchaser* limitations on Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) liability (the "*landowner liability protections*," or "*LLPs*"). This practice constitutes "all appropriate inquiry into the previous ownership and uses of the property consistent with good commercial or customary practice".

B. Detailed Scope-of-Services

The scope of services performed during this Phase I ESA project includes:

1. Collecting available information concerning the property as it pertains to:
   a. Past land use
   b. Past owners
   c. Location of buried storage tanks, hazardous waste storage, wastewater treatment facilities and/or on-site landfills, etc.
   d. Types of chemicals used on site, past and present
   e. Geologic and hydrogeologic features
   f. Past geotechnical investigations (if available)
   g. Other data pertinent to the specific site
2. Conducting a site visit to:
   a. Identify vegetative features

   b. Locate surface waters
   c. Assess physical features
   d. Observe adjacent land use
   e. Gather evidence of indiscriminate and/or illegal waste disposal
3. Conducting a review of records maintained by regulatory agencies as follows:
   a. Reviewing regulatory files regarding the property in question
   b. Contacting appropriate regulatory personnel
4. Conducting a Vapor Encroachment Screen.
5. Preparing the Phase I Environmental Site Assessment Report, summarizing our findings and inclusive of supporting documentation.

C. Significant Assumptions

No significant assumptions were made during the course of this investigation.

D. Limitations and Exceptions

This type of ESA does not include air, soil or water sampling; or sampling of building materials. Site-specific conditions such as soil deposits and rock formations may vary in thickness, lithology, saturation strength, and other properties across any site beyond what available documentation indicates. Therefore, it is possible that undocumented or concealed improvements or alterations to the property could exist beyond the inquiry of the activities conducted during this site assessment. In addition, environmental changes, either naturally occurring or artificially induced, may cause changes or alterations (which can be significant) to the property as compared to the conditions found at the time that this assessment was conducted.

Based on the best available investigative technologies, no amount of assessment can guarantee that the subject property does not contain contaminants or hazardous substances. The activities conducted during this limited investigation cannot identify all potential concerns for the subject property, and do not eliminate the possibility that the subject property is completely free of environmental concerns.

KCE Matrix has analyzed and evaluated the information collected during this investigation using what we believe to be the currently applicable assessment and engineering techniques and principles. KCE Matrix assumes no liability from other parties involved in losses sustained as a result of decisions made based on interpretations of this report. KCE Matrix makes no warranty, either expressed or implied, regarding the work conducted, except that our services were performed in accordance with the generally accepted professional principles and practices existing for such work.

There are no significant data gaps to report during this investigation.

E. Special Terms and Conditions

This report and all information obtained during this site assessment are considered confidential and will not be released without written permission by the owner of the subject property, the owner authorized entity conducting this assessment, or as required by law. The owner of the subject property is typically responsible for mitigation of contamination, corrective or remedial action, and disclosure of any information related to environmental issues that may or may not be discovered during this site assessment.

F. User Reliance

This report was prepared for the exclusive use of the client and/or user. No other person or entity is entitled to rely upon this report without the specific written authorization of KCE Matrix. Any such reliance by any third party is at the sole risk of said third party, and such reliance is subject to the same limitations, terms and conditions as the original contract with the client. KCE Matrix specifically disclaims any responsibility for any unauthorized use of this report.

III. SITE DESCRIPTION

A. Location and Description

The subject property is located on the northern corner of the intersection of Drake Avenue and Park Circle, in Sausalito (Marin City), California. A Location Map, Site Plan, and Site Vicinity Map are presented in Appendix A, as Figures 1, 2 and 3, respectively.

B. Site and Vicinity General Characteristics

The subject property is located within a commercial and residential area. The property consists of approximately 44,250 square feet (1.0 acre) of land area in an irregular-shaped configuration and has an approximate elevation of 56 feet above mean sea level. The site can be accessed from a driveway along Drake Avenue to the south of the property.

The subject property currently contains a manufactured structure that covers approximately 2,000 square feet of land area in a rectangular-shaped configuration, located on the western portion of the property. A smaller manufactured storage structure is located to the north of the larger structure along the northern property line. A relatively large driveway and/or parking area is located to the east of the structure on the central portion of the property. The eastern portion of the property consists of vacant land with no structures and a dirt and grassy unfinished surface.

C. Current Use of the Property

Relatively recently, the larger manufactured structure on site and the property has been occupied by “Village Baptist Church” until at least 2015 and has been used as office space by a non-profit organization known as The Hannah Project.

D. Description of Structures and Other Improvements

The subject property is located within a commercial and residential area. The property consists of approximately 44,250 square feet (1.0 acre) of land area in an irregular-shaped configuration and has an approximate elevation of 56 feet above mean sea level. The site can be accessed from a driveway along Drake Avenue to the south of the property.

The subject property currently contains a manufactured structure that covers approximately 2,000 square feet of land area in a rectangular-shaped configuration, located on the western portion of the property. A smaller manufactured storage structure is located to the north of the larger structure along the northern property line. A relatively large driveway and/or parking area is located to the east of the structure on the central portion of the property. The eastern portion of the property consists of vacant land with no structures and a dirt and grassy unfinished surface.

E. Current Uses of the Adjoining Properties

The adjoining properties are comprised of the following:

- North: Residential properties and residential streets.
- East: Residential properties, Donahue Street and commercial/retail facilities.
- South: Drake Avenue, residential properties, George Rocky Graham Park, Marin County Sheriff's Department office, Marin City Community Service District office, Phillips Drive, Bayside Martin Luther King Jr. Academy and residential properties.
- West: Residential properties and residential streets.

IV. USER PROVIDED INFORMATION

A user questionnaire was completed by the client and was provided to KCE Matrix during this investigation. A copy of the completed user questionnaire is presented in Appendix E of this report.

A. Title Records

The client provided KCE Matrix with a copy of a Preliminary Title Report for the subject property as prepared by First American Title Company, dated September 9, 2022. Based on review of the title report for the subject property, no environmental liens and/or Activity and Use Limitations (AUL's), which indicate a past or present release of a hazardous substance or petroleum products, were presented or recorded. A copy of the title report as prepared by First American Title Company dated September 9, 2022 is presented in Appendix E.

B. Environmental Liens or Activity and Use Limitations

The user reported that he is not aware of any environmental cleanup liens that are filed or recorded against the property under federal, tribal, state or local law. The user also reported that he is not aware of any Activity and Use Limitations (AUL's) that are filed or recorded against the property.

C. Specialized Knowledge

The user did not report any specialized knowledge related to the property or to nearby properties.

D. Commonly Known or Reasonably Ascertainable Information

The user reported that the property has been most recently occupied by a Church. The user did not report any other commonly known or reasonably ascertainable information related to the property.

E. Valuation Reduction for Environmental Issues

The user reported that the purchase price of this property reasonably reflects the fair market value of the property. The user did not report any other information with regard to the value of the subject property based on environmental issues.

F. Owner, Property Manager, and Occupant Information

The user identified Ms. Kimberly Calica as a site contact for the subject property. The user also reported "Pacific West Communities; AMG" as parties who will rely on the Phase I report. The user did not provide any other information regarding the ownership, management or occupancy of the subject property.

G. Reason for Performing Phase I

This Phase I ESA is being performed for the client as part of a due diligence investigation of the subject property for land transaction purposes. (purchase and closing)

H. Vapor Encroachment

The user reported that the site is currently vacant land that has a manufactured structure. The user reported that the future structure on site will have a slab-on-grade foundation system. The user also reported that the structure on site will use hot air circulation as the heating system type, and natural gas and electricity as the fuel energy type. The user also reported that neither a gas station nor a dry cleaner operates or will operate on site.

I. Other

The user did not report any other knowledge or experience for the subject property with regard to environmental condition.

V. RECORDS REVIEW

A. Standard Environmental Record Sources

KCE Matrix retained Environmental Data Resources, Inc. (EDR) to conduct a search of government and regulatory databases in an attempt to locate and obtain information about the subject site and other sites in the vicinity of the subject property that may affect the environmental quality of the property. The environmental disclosure report prepared by EDR provides a summary of the various databases searched and is presented in Appendix B of this report. The database research presents summaries for the subject site and selected adjoining properties as follows:

A1. Subject Site

The databases identified the subject property as "The Village Baptist Church". The information for the subject property is presented in Appendix B, on pages nine through 15 of the referenced EDR report.

Facility Name	Data Base	Regulatory History and/or Reported Impact and Current Status
(Not Reported)	ERNS	Listed the facility on the Federal Emergency Response Notification System (ERNS). Reported the description of Incident as follows: "caller reported a transformer fell off of a pole and materials went into a storm drain". Reported the incident date as 12/12/2009, and the amount of material as 48 gallons of oil, miscellaneous, mineral.
The Village Baptist Church	HAZNET	Listed one report dated 2002. The database indicated that the site had asbestos containing waste. Reported the methods of disposal as disposal and landfill.
The Village Baptist Church	HWTS	Listed the facility in the "Hazardous Waste Tracking System" database. Reported the EPA ID number as CAC002365527, and the facility status as "Inactive" as of 09/10/2002.

A2. Site Vicinity

With regard to the summary report prepared by EDR, KCE Matrix has prepared the following table listing other sites located in the general vicinity of the subject property up to a reported radius of approximately 500 feet. This summary table includes the site names, the reported distances from the subject property, as well as a brief summary of the information reported by the databases searched.

Facility Name	Address	Dist. (ft)	Database	Regulatory History and/or Reported Impact and Current Status
County of Marin/Marin City Fire	850 Drake Avenue	98 SE	CERS	Reported the CERS description as "Chemical Storage Facilities".
County of Marin/Marin City Fire	850 Drake Avenue	98 SE	CERS TANKS	Reported the CERS description as "Aboveground Petroleum Storage".

Facility Name	Address	Dist. (ft)	Database	Regulatory History and/or Reported Impact and Current Status
Marin County Fire & Sheriff	850 Drake Ave.	98 SE	UST	Reported the tank status as "UST Removal" and the tank content as "Premium unleaded" that was used for motor vehicle fueling.
County Of Marin/Marin City Fire	850 Drake Avenue	98 SE	AST	Reported the facility ID number. The capacity of the AST is not reported.
Marin City Firehouse/Sheriff S	850 Drake Ave	98 SE	SWEEPS UST	Reported one UST with a capacity of 1,000 gallons used for regular unleaded. Reported the UST status as active as of 1985.
Marin City Firehouse/Sheriff S	850 Drake Ave.	98 SE	HIST UST	Reported one UST with a capacity of 1,000 gallons installed in 1969 and used for premium fuel.
Marin City Firehouse/Sheriff S	850 Drake Ave	98 SE	HIST UST	Reported the file number. The number and the capacity of the tanks were not reported.
Betty Price	710 Drake Avenue	230 SSW	RCRA NonGen / NLR	Classified the facility as not being a generator of Federal RCRA waste. No violations were reported.
Betty Price	710 Drake Ave	230 SSW	RCRA NonGen / NLR	Classified the facility as not being a generator of Federal RCRA waste. No violations were reported.
Marilyn Hutcheson	708 Drake Avenue	237 SSW	RCRA NonGen / NLR	Classified the facility as not being a generator of Federal RCRA waste. No violations were reported.

In addition, the EDR databases searched identified one unmapped site as follows:

Name	Address
One Medical Group, Inc. - Strawberry	750 Redwood Hwy Frontage Rd # 1209-1215a

The disclosure report prepared by EDR identified the one unmapped site as an Orphan site. Based on site vicinity reconnaissance up to an approximate radius of 0.25-mile from the subject site and based on the address and information provided in the Orphan Site Summary as prepared by EDR, the one unmapped site was not observed to be located in the immediate vicinity of the subject property and appears to be located in excess of 0.25-mile from the subject site.

B. Additional Environmental Record Sources

Regional Water Quality Control Board

On January 4, 2023, KCE Matrix submitted a written request to the Regional Water Quality Control Board (RWQCB), San Francisco Bay Region – File Review Department; for information regarding Underground Storage Tanks (USTs) and hazardous materials for the subject property. Based on an email response issued by the RWQCB dated January 10, 2023, this agency does not maintain any records for the subject property. A copy of the written request made by KCE Matrix dated January 4, 2023 and a copy of the RWQCB email response dated January 10, 2023 are presented in Appendix C-1.

KCE Matrix also researched the records maintained by the State Water Resources Control Board (SWRCB) – Geotracker Database online for information regarding Underground Storage Tanks (USTs) and hazardous materials for the subject property. This database typically contains records that are also maintained by the various local RWQCB's. The results of this online research indicated that the SWRCB-RWQCB does not maintain such records for the subject property.

Department of Toxic Substances Control

On January 4, 2023, KCE Matrix submitted a written request to the California State Department of Toxic Substances Control (DTSC) – Berkeley Regional Office; for information regarding hazardous materials and USTs for the subject property. Based on a letter response issued by the DTSC to KCE Matrix dated January 12, 2023, this agency does not maintain any records for the subject property. A copy of the written request made by KCE Matrix dated January 4, 2023 and a copy of the DTSC letter response dated January 12, 2023 are presented in Appendix C-2.

KCE Matrix also researched the records maintained by the DTSC Envirostor Database online for information regarding environmental assessment and remediation matters for the subject property. The results of this online research indicated that the DTSC Envirostor Database does not maintain such records for the subject property.

In addition, KCE Matrix researched the records maintained by the DTSC Hazardous Waste Tracking System database online for information regarding hazardous wastes generated and/or stored at the subject property. Based on the research conducted, the subject property was identified as follows:

Name	Address	ID Number	Status	Chemicals	Year
The Village Baptist Church	825 Drake Ave	CAC002365527	Inactive as of 9/10/2002	Asbestos-Containing Waste (88.494 Tons)	2002

A copy of the Waste Code Matrix as generated by the DTSC Hazardous Waste Tracking System online is presented in Appendix C-2.

Marin County – Certified Unified Program Agency

On January 4, 2023, KCE Matrix submitted a written request to the Marin County – Certified Unified Program Agency (CUPA), Waste Management Division; for information regarding Underground Storage Tanks (USTs) and hazardous materials for the subject property. Based on an email response issued by the CUPA dated January 6, 2023, this agency does not maintain any records for the subject property. Copies of the written request made by KCE Matrix dated January 4, 2023 and the CUPA email response dated January 6, 2023 are presented in Appendix C-3.

Marin County Fire District

On January 4, 2023, KCE Matrix submitted a written request to the Marin County Fire Department (MCFD); for information regarding Underground Storage Tanks (USTs) and hazardous materials for the subject property. Based on a letter response issued by the MCFD dated January 17, 2023, this agency does not maintain any records for the subject property. A copy of the written request made by KCE Matrix dated January 4, 2023 and a copy of the MCFD email response dated January 17, 2023 are presented in Appendix C-4.

California Geologic Energy Management Division

KCE Matrix researched the records maintained by the California Geologic Energy Management (CalGEM) Division (formerly known as the Division of Oil, Gas, and Geothermal Resources (DOGGR)) Database online for information regarding oil and natural gas wells for the subject property and the general vicinity. The results of this online research did not indicate references to any oil and/or natural gas wells as being located on the subject property.

California Environmental Protection Agency

KCE Matrix researched the records maintained by the California Environmental Protection Agency (CalEPA) Database online for information regarding environmentally regulated sites and facilities. The results of this online research indicated that the CalEPA Database does not maintain such records for the subject property.

C. Physical Setting Source(s)

C1. Topography

The site has an approximate elevation of 56 feet above mean sea level. A Location Map that shows the physical setting of the subject property and vicinity is presented in Appendix A, as Figure 1.

C2. Geology/Hydrogeology

KCE Matrix conducted a search of groundwater monitoring data as maintained by the State Water Resources Control Board (SWRCB) – Geotracker database for hydrology information for the site and site vicinity. Based on information maintained for a property located 0.13-mile southeast of

the subject property, the depth to groundwater was reported to range between 5.81 feet and 11.23 feet below the surface as stated in the Site Closure Summary reported as prepared in July of 2007. Based on monitoring data collected from wells located at a second site that is approximately 0.78-mile northwest of the subject site, the depth to groundwater was reported to range between 3.66 feet and 5.16 feet below the surface as monitored in February of 2004. The groundwater information obtained from the SWRCB Geotracker Database for the general site vicinity is presented in Appendix C-5.

The surface of the subject property is essentially flat and has an approximate elevation of 56 feet above mean sea level. With regard to the surrounding area, the general topographic gradient is reported to have a gradual slope down to the east based on information obtained from EDR. General subsurface soil and topographic gradient information for the site and vicinity is presented in the Physical Setting Source Summary Report prepared by EDR in Appendix B (pages A-1 through A-6).

The National Wetlands Inventory (NWI) was established by the United States (U.S.) Fish and Wildlife Service (Service) in 1974 to conduct a nationwide inventory of U.S. wetlands to provide its biologists and others with information on the distribution of wetlands to aid in wetland conservation efforts. Based on review of information obtained from the NWI as maintained by the Service online, the subject property does not appear to be a designated wetland area. The NWI map identifies the following wetland(s) as the closest designated wetland area(s) in the vicinity of the subject property:

Wetland	Distance	
Richardson Bay	0.20 mi	To the northeast of the subject site
Several Creeks	0.15 mi	To the west of the subject site
Coyote Creek	0.60 mi	To the northwest of the subject site

The NWI wetland map for the vicinity of the subject property is presented in Appendix C-6. In addition, references to the nearest wetland areas are presented in the maps presented in the Executive Summary of the EDR report presented in Appendix B.

The Federal Emergency Management Agency (FEMA) has defined geographic areas as Flood Zones according to varying levels of flood risk. These zones are depicted on a community's Flood Insurance Rate Map (FIRM) or Flood Hazard Boundary Map. Each zone reflects the severity or type of flooding in the area. Based on review of information obtained from the FEMA's National Flood Hazard Layer (NFHL) Viewer online, the subject property is located in Zone X, an area of minimal flood hazard. The NFHL map for the general vicinity of the subject property is presented in Appendix C-7.

D. Historical Use Information - Subject Property

D1. Building Records

On January 4, 2023, KCE Matrix submitted a written request to the Marin County Community Development agency (MCCD) for information regarding site history, including building records,

certificates of occupancy and violations. On January 17, 2023, KCE Matrix received records as maintained by the MCCD. The records consisted of a letter dated January 24, 2023, related to a sidewalk damage along the frontage of the subject property that required repair, and an encroachment permit application issued in June of 2015 by the Marin County, to replace an 8-inch wide section of the sidewalk. These records reported the occupancy of the site as "Village Baptist Church".

On January 23, 2023, KCE Matrix also researched the records maintained by the MCCD agency database online for site history related information. The records available online consisted of several permit applications dated between 1965 and 2010. Based on the records reviewed, the subject property was occupied by Village Baptist Church. In addition, a two-story structure was reported on site in 1965, and a permit application dated 2010, referring to development of a 25-Unit structure on the parcel.

A copy of the written request made by KCE Matrix dated January 4, 2023 and copies of the records as maintained by the Marin County Community Development Agency database online and reviewed by KCE Matrix are presented in Appendix D-1.

D2. Historic Maps

KCE Matrix contacted EDR in an effort to obtain historic Sanborn® Maps of the subject site and vicinity. Based on a search of the EDR historic map collection, no such historic maps were maintained by EDR for the subject property and immediate vicinity. A copy of the Sanborn® Map Report dated January 3, 2023 indicating that there is no coverage for the subject property and vicinity is presented in Appendix D-2.

D3. Aerial Photographs

KCE Matrix contacted EDR in an effort to obtain historic and/or recent Aerial Photographs of the subject site and vicinity. Based on the Aerial Photographs for the subject property dated from 1946 through 2020 as obtained by KCE Matrix from EDR, it appears that the subject property was occupied by several residential structures between 1946 and 1958. In 1963, the residential structures appear to have been demolished and the property consisted of vacant land with no structures. Between 1968 and 1993, a structure is located on the eastern portion of the property, and the remaining areas were comprised of vacant land, driveways and parking areas. As of 2005 and through 2020, the structure that was located on the eastern portion of the property is no longer evident, and another, relatively smaller structure is located on the western most portion of the property, and the remaining areas are vacant land and/or driveways/parking lot. Copies of aerial photographs dated 1946, 1952, 1958, 1963, 1968, 1974, 1983, 1987, 1993, 2005, 2009, 2012, 2016 and 2020 for the subject property and site vicinity obtained by KCE Matrix from EDR are presented in Appendix D-3.

D4. Historical Topographic Maps

KCE Matrix contacted EDR in an effort to obtain historic and/or recent Topographic Maps of the subject site and vicinity. Based on the historic and/or recent Topographic Maps dated 1895/1897 through 2018 as obtained by KCE Matrix from EDR, the property was vacant land in 1895/1897. Based on the Topographic Maps provided to KCE Matrix, it is not possible to discern whether the property was developed between 1940 and 1950. Based on the Topographic Map dated 1954/1956/1959 through 1980, it appears that the site was developed, and structures were evident on the central and eastern most portions of the subject property. Detailed information was not provided regarding the subject property on the Topographic Maps dated 1996 through 2018. In addition, the subject property was not presented on the Topographic Map dated 1995. Copies of the Historical Topographic Maps dated 1895/1897, 1940, 1941, 1947/1948, 1950, 1954/1956/1959, 1968, 1978/1980, 1995, 1996, 2012, 2015 and 2018 as obtained from EDR and reviewed by KCE Matrix are presented in Appendix D-4.

D5. City Directory Abstract

Based on the review of the City Directory Abstract report as obtained by KCE Matrix from EDR, it appears that the subject property was occupied by a church facility known as "Village Baptist Church" between 1973 and 2005. A copy of the City Directory Abstract obtained from EDR and reviewed by KCE Matrix is presented in Appendix D-5.

D6. Recorded Land Title Records

The client provided KCE Matrix with a copy of a Preliminary Title Report for the subject property as prepared by First American Title Company, dated September 9, 2022. Based on review of the title report for the subject property, no environmental liens and/or Activity and Use Limitations (AUL's), which indicate a past or present release of a hazardous substance or petroleum products, were presented or recorded. A copy of the title report as prepared by First American Title Company dated September 9, 2022 is presented in Appendix E.

E. Historical Use Information - Adjoining Properties

E1. Historic Maps

KCE Matrix contacted EDR in an effort to obtain historic Sanborn® Maps of the subject site and vicinity. Based on a search of the EDR historic map collection, no such historic maps were maintained by EDR for the subject property and immediate vicinity. A copy of the Sanborn® Map Report dated January 3, 2023 indicating that there is no coverage for the subject property and vicinity is presented in Appendix D-2.

E2. Aerial Photographs

KCE Matrix contacted EDR in an effort to obtain historic and/or recent Aerial Photographs of the subject site and vicinity. Based on the Aerial Photographs for the subject property and vicinity

dated from 1946 through 2020 as obtained by KCE Matrix from EDR, the general vicinity was occupied by essentially residential properties with a few commercial/retail developments between 1946 and 1958. In 1963, the majority of the residential properties, particularly in areas to the west, north and east of the subject property were demolished and these properties became vacant land. In 1968, gradual development of residential properties is evident in the general vicinity of the subject site, particularly in areas where the previous residential structures were demolished; and the vicinity to the south of the subject site appears to have been redeveloped. Between 1974 and 1993, gradual development of essentially residential properties is evident in the general vicinity to the west, north and east of the subject property; and the vicinity to the south is essentially vacant land with dispersed residential and/or commercial structures. As of 2005 and through 2020, the vicinity to the west, north and east is developed as residential properties, and the vicinity to the south is developed by residential and/or commercial/retail properties. Copies of aerial photographs dated 1946, 1952, 1958, 1963, 1968, 1974, 1983, 1987, 1993, 2005, 2009, 2012, 2016 and 2020 for the subject property and site vicinity obtained by KCE Matrix from EDR are presented in Appendix D-3.

E3. Historical Topographic Maps

KCE Matrix contacted EDR in an effort to obtain historic and/or recent Topographic Maps of the subject site and vicinity. Based on the historic and/or recent Topographic Maps for the subject property and the general vicinity dated from 1895/1897 through 2018 as obtained by KCE Matrix from EDR, the vicinity was vacant land between 1895/1897 and 1947/1948. In 1950, the vicinity, particularly in the area to the south of the subject property, is somewhat more developed. In 1954/1956/1959, the general vicinity is further developed. In 1968, less development is evident in the general vicinity of the property. As of 1978/1980 and through 2018, the general vicinity is gradually developed with residential and/or commercial/retail properties. The site vicinity to the south, west and east was not presented on the Topographic Map dated 1995. Copies of the Historical Topographic Maps dated 1895/1897, 1940, 1941, 1947/1948, 1950, 1954/1956/1959, 1968, 1978/1980, 1995, 1996, 2012, 2015 and 2018 as obtained from EDR and reviewed by KCE Matrix are presented in Appendix D-4.

E4. City Directory Abstract

Based on review of the City Directory Abstract report obtained by KCE Matrix from EDR; additional information with regard to addresses in the site vicinity is presented. Information with regard to listings that are or were located in the immediate vicinity of the subject property is presented on pages A2 through A46 of the referenced EDR City Directory Abstract report. A copy of the City Directory Abstract report obtained from EDR and reviewed by KCE Matrix is presented in Appendix D-5.

VI. SITE RECONNAISSANCE

A. Non-ASTM Scope Considerations

Site reconnaissance is limited to the areas accessible and inspected during this investigation. No sampling or analysis of any building materials for asbestos content or paint for lead content was conducted during this assessment.

Based on the work performed during this investigation, the manufactured structure that is currently located on the western portion of the subject property was constructed as of approximately 2005. In general, for building structures that were constructed prior to 1978, it is possible that some of the building materials in such structures may have Asbestos Containing Material (ACM) or may have been painted with Lead-Based Paint (LBP) at some point in time.

Exposure to asbestos is a health concern when building materials are friable. In working near, repairing or replacing materials such as these, a licensed asbestos abatement contractor, or personnel specially trained in working with or near asbestos should be employed. With regard to LBP, exposure to lead from LBP is a health concern when lead dust is created and can be inhaled or LBP chips are accessible for ingestion. In working near, assessing, repairing or replacing materials that contain LBP, certified lead professionals specially trained in working with or near LBP should be employed.

Radon is a colorless, odorless, naturally occurring, radioactive, inert, gaseous element formed by radioactive decay of radium (Ra) atoms. The United States Environmental Protection Agency (EPA) and the California EPA have prepared a map to assist National, State, and local organizations to target their resources and to implement radon-resistant building codes. It is important to note that the EPA has found homes with elevated levels of radon in all three designated zones, and the US EPA recommends site-specific testing in order to determine radon levels at a specific location. However, the map does give a valuable indication of the propensity of radon gas accumulation in structures. The map divides the country into three Radon Zones as follows:

- Zone 1: Highest Potential - Counties that have a predicted average indoor radon screening level greater than 4 picocuries per liter (pCi/L), the US EPA Action Limit.

- Zone 2: Moderate Potential - Counties that have a predicted average indoor radon screening level between 2 and 4 pCi/L.

- Zone 3: Low Potential - Counties that have a predicted average indoor radon screening level less than 2 pCi/L.

Radon sampling was not conducted as part of this assessment. Review of the California EPA Map of Radon Zones places the subject property in Zone 3, where average predicted radon levels are less than 2.0 pCi/L. Based upon the radon zone classification, radon is not considered to be a significant environmental concern.

B. General Site Setting

The subject property is located within a commercial and residential area on the northern corner of the intersection of Drake Avenue and Park Circle, in Sausalito (Marin City), California. The property consists of approximately 44,250 square feet (1.0 acre) of land area in an irregular-shaped configuration. The site can be accessed from a driveway along Drake Avenue to the south of the property.

The subject property currently contains a manufactured structure that covers approximately 2,000 square feet of land area in a rectangular-shaped configuration, located on the western portion of the property. A smaller manufactured storage structure is located to the north of the larger structure along the northern property line. A relatively large driveway and/or parking area is located to the east of the structure on the central portion of the property. The eastern portion of the property consists of vacant land with no structures and a dirt and grassy unfinished surface. Relatively recently, the larger manufactured structure on site and the property has been occupied by "Village Baptist Church" until at least 2015 and has been used as office space by a non-profit organization known as The Hannah Project.

A Location Map, a Site Plan and a Site Vicinity Map are presented in Appendix A, as Figures 1, 2 and 3, respectively. During site reconnaissance, KCE Matrix also obtained photographs of the subject property and vicinity. Selected photographs are presented in Appendix F.

C. Observations

On January 19, 2023, a representative of KCE Matrix inspected the subject property and recorded the following observations:

	Description	Comments
1	Industrial Use	None observed
2	Gas Station	None observed
3	Motor Repair Facility	None observed
4	Commercial Printing Facility	None observed
5	Dry Cleaning	None observed
6	Photo Development Laboratory	None observed
7	Junkyard	None observed
8	Landfill	None observed
9	Waste Treatment	None observed
10	Storage Facility	None observed
11	Disposal Facility	None observed
12	Processing Facility	None observed
13	Recycling Facility	None observed
14	Batteries	None observed
15	Pesticides or agricultural activity	None observed
16	Paints	None observed
17	HazMat storage or use	None observed
18	Potential HazMat storage or use	None observed
19	Dumping or Improper Disposal of HazMat	None observed
20	Drums and Other Containers	None observed

	Description	Comments
21	PCB's, Transformers, Capacitors or Hydraulic equipment, other equipment	None observed
22	Chemical Products	None observed
23	Asbestos, Age of Building, Blueprints	Not likely, due to the age of the manufactured structures on site
24	Paint Condition, LBP	Not likely, due to the age of the manufactured structures on site
25	Building Demolition or Renovation	None observed
26	Fill Dirt From Other Locations	None observed
27	Stained Soil or Spills	Typical for parking areas
28	Oil or Gas Wells	None observed
29	Underground Storage Tanks (USTs)	None observed
30	Above-ground Storage Tanks (AST's)	None observed
31	Hydraulic Hoists	None observed
32	Clarifier/Wastewater Interceptor	None observed
33	Subsurface or Underground Pipes	Other than related to domestic plumbing, none observed
34	Above Ground Pipes	None observed
35	Flooring, Drains or Walls Emitting Foul Odors	None observed
36	Pits, Pounds, Lagoons or Cesspools	None observed
37	Distressed Vegetation	Minor, due to lack of care
38	Pools of Liquid, Drains, Sumps, Stains, Septic Tanks	None observed
39	Environmental Liens	None observed
40	Government Notifications Regarding Environmental Violation	None observed
41	HazMat Inventory	None
42	Disclosure of Hazardous Substances or Petroleum Products	None observed
43	Previously Conducted Environmental Site Assessments	None observed
44	Wastewater Generation or Disposal	Domestic
45	Water Supply System, Water Usage	Domestic
46	Regulated Air Emissions	None observed
47	Heating/Cooling	Domestic
48	Potable, Irrigation, or Monitoring Wells	None observed
49	Storm water drainage	Surface drainage
50	Odors	Not perceived
51	Solid Waste	None observed

D. Site Vicinity Reconnaissance

KCE Matrix conducted a brief inspection of the immediate vicinity of the subject property. The adjoining properties are comprised of the following:

- North: Residential properties and residential streets.
- East: Residential properties, Donahue Street and commercial/retail facilities.

- South: Drake Avenue, residential properties, George Rocky Graham Park, Marin County Sheriff's Department office, Marin City Community Service District office, Phillips Drive, Bayside Martin Luther King Jr. Academy and residential properties.

- West: Residential properties and residential streets.

VII. INTERVIEWS

A. Interview with Owner

KCE Matrix did not conduct an interview with the current owner of the subject property during this investigation.

B. Interview with Site Manager

KCE Matrix did not conduct an interview with the current site manager of the property during this investigation. No one was available on site at the time of inspection as performed by KCE Matrix.

C. Interviews with Occupants

KCE Matrix did not conduct an interview with the current occupant of the property during this investigation. No one was available on site at the time of inspection as performed by KCE Matrix.

D. Interviews with Local Government Officials

KCE Matrix did not interview any local government officials regarding the subject property during this investigation.

E. Interviews with Others

KCE Matrix interviewed a representative of the client who indicated that a Phase I ESA had been performed for the subject property in January and February of 2020 by another firm. Also, the client indicated that relatively recently, the manufactured structure on site has been used as office space by a non-profit organization known as The Hannah Project.

Based on information provided by the client to KCE Matrix, a Phase I ESA was previously performed for the subject property by Environmental Geology Services (EGS) in January and February of 2020 as presented in the EGS summary report dated February 18, 2020. Based on the information contained in the referenced EGS report, historic information with regard to the subject property can be described as follows:

- The vicinity of the subject property was initially developed during World War II when residential structures were constructed including six residential homes on the subject

property. At that time, the subject site was larger and included a relatively large parcel of land located to the north of the current site.

- The subject property was first occupied by the Village Baptist Church in approximately 1958, at a time when the church occupied and used four residential structures that were on site at that time. In 1965, the Village Baptist Church subsequently constructed a new facility on the southeastern portion of the subject property which served as the primary church facility until October of 1999 when this structure was destroyed by a fire event. The church then retained a licensed contractor "*who encapsulated the burned structure and removed approximately 88.49 tons of asbestos containing material (ACM). The ACM was loaded, hauled, and disposed of under permit ID S112915955 and EPA ID CAC002365527*." After removal of the ACM was completed, the church retained a licensed contractor to demolish the former church facility under a permit with the Marin County Community Development Agency.
- Subsequently, the Village Baptist Church replaced their original church facility structure with a temporary facility and used and occupied that facility on the subject site until 2015, at which time the church moved to Petaluma, California.
- During the mid-1980's, the Village Baptist Church split the original larger property into two lots, and developed a 25-unit senior housing complex known as The Village Oduduwa, which was at that time and continues to be located on the adjacent property located to the north of the subject site.

Furthermore, based on the assessment work performed, EGS did not identify any RECs, HRECs or CRECs in association with the subject property.

A copy of the referenced report as prepared by EGS dated February 18, 2020 is presented in Appendix E.

VIII. VAPOR ENCROACHMENT SCREEN

During this investigation, KCE Matrix conducted a Vapor Encroachment Screen (VES) for the subject property based on the ASTM E2600-10 guideline. The goal of conducting a VES as established by the ASTM, is to identify a potential Vapor Encroachment Condition (VEC) for the subject property, which is defined as the presence or likely presence of Chemicals of Concern (COC) vapors in the subsurface of the subject property caused by the release of vapors from contaminated soil or groundwater either on or near the subject site. Detailed information with regard to the VES evaluation conducted, the methodology used, and the information for other sites located in the immediate vicinity of the subject property as provided to KCE Matrix by EDR is presented in a VES summary report presented in Appendix G of this report.

A. Subject Property - VES

Based on the research conducted during this investigation, several residential structures were located on the property between 1946 and 1958. The subject property was first occupied by the Village Baptist Church in approximately 1958, at a time when the church occupied and used four

residential structures that were on site at that time. These residential structures were demolished, and the property was vacant land in 1963. In 1965, the Village Baptist Church subsequently constructed a new facility on the eastern portion of the subject property which served as the primary church facility until October of 1999 when this structure was destroyed by a fire event. As of approximately 2005, it appears that this structure was demolished and removed from the property, and a relatively smaller manufactured structure was erected on the western most portion of the property. The subject property continued to be occupied by the Village Baptist Church until approximately 2015. More recently, the manufactured structure on site has been used as office space by a non-profit organization known as The Hannah Project.

On January 19, 2023, a representative of KCE Matrix conducted site inspection for the subject property and confirmed that the property currently contains a single-story manufactured structure located on the western most portion of the property, along with a second smaller manufactured storage structure near and to the north of the larger structure, and the remaining areas consist of a parking lot, and vacant land with no structures. Based on the site history of the subject property as described above, a VEC originating from the subject site was not identified.

B. Site Vicinity - VES

Based on the research conducted during this investigation for other sites located in the general vicinity of the subject property, three other sites were identified and/or evaluated during this VES. The evaluation of these other sites located closest to the subject property includes the following:

Facility Name	Facility Address	Database
County Of Marin/Marin City Fire	850 Drake Avenue	CERS TANKS, CERS
Marin County Fire & Sheriff	850 Drake Ave.	UST
County of Marin/Marin City Fire	850 Drake Avenue	AST
Marin City Firehouse/Sheriff S	850 Drake Ave	SWEEPS UST
Marin City Firehouse/Sheriff S	850 Drake Ave.	HIST UST
Marin City Firehouse/Sheriff S	850 Drake Ave	HIST UST
Betty Price	710 Drake Avenue	RCRA NONGEN / NLR
Betty Price	710 Drake Ave	RCRA NONGEN / NLR
Marilyn Hutcheson	708 Drake Avenue	RCRA NONGEN / NLR

Based on information available to KCE Matrix as obtained from the EDR databases, one of these other sites has been identified as a facility with a historic Underground Storage Tank (UST). It is reported that the UST was removed from this other site. In addition, this other property is located down-gradient and at an elevation that is substantially lower as compared to the subject property. As such, this facility does not present any VEC to the subject property. The two other sites have been identified as non-generators with no reported violations.

Based on the information as presented above, a VEC originating from these other nearby sites or from the site vicinity was not identified for the subject property. Detailed information with regard to the VES evaluation conducted is presented in a VES summary report presented in Appendix G of this report.

IX. FINDINGS

The following presents our findings based on the work performed during this Phase I ESA:

- The subject property is located within a commercial and residential area on the northern corner of the intersection of Drake Avenue and Park Circle, in Sausalito (Marin City), California. The property consists of approximately 44,250 square feet (1.0 acre) of land area in an irregular-shaped configuration. The site can be accessed from a driveway along Drake Avenue to the south of the property.

- The subject property currently contains a manufactured structure that covers approximately 2,000 square feet of land area in a rectangular-shaped configuration, located on the western portion of the property. A smaller manufactured storage structure is located to the north of the larger structure along the northern property line. A relatively large driveway and/or parking area is located to the east of the structure on the central portion of the property. The eastern portion of the property consists of vacant land with no structures and a dirt and grassy unfinished surface. Relatively recently, the larger manufactured structure on site and the property has been occupied by "Village Baptist Church" until at least 2015 and has been used as office space by a non-profit organization known as The Hannah Project.

- Based on the historic information obtained during this investigation (including research of Sanborn Maps, Aerial Photographs, regulatory records and city directories), several residential structures were located on the property between 1946 and 1958. The subject property was first occupied by the Village Baptist Church in approximately 1958, at a time when the church occupied and used four residential structures that were on site at that time. These residential structures were demolished, and the property was vacant land in 1963. In 1965, the Village Baptist Church subsequently constructed a new facility on the eastern portion of the subject property which served as the primary church facility until October of 1999 when this structure was destroyed by a fire event. As of approximately 2005, it appears that this structure was demolished and removed from the property, and a relatively smaller manufactured structure was erected on the western most portion of the property. The subject property continued to be occupied by the Village Baptist Church until approximately 2015. More recently, the manufactured structure on site has been used as office space by a non-profit organization known as The Hannah Project.

- On January 19, 2023, a representative of KCE Matrix conducted site inspection for the subject property and confirmed that the property currently contains a single-story manufactured structure located on the western most portion of the property, along with a second smaller manufactured storage structure near and to the north of the larger structure, and the remaining areas consist of a parking lot, and vacant land with no structures.

- As reported in the search of government and regulatory environmental databases and as presented in Section V-A2 and Section VI-D of this report, the subject property is located in a residential and commercial area where information related to environmental assessment, remediation and/or management practices is documented for other properties in the general site vicinity. One of these other sites has been identified as a facility with a historic Underground Storage Tank (UST). It is reported that the UST was removed from this other property. In addition, this other property is located down-gradient and at an elevation that is substantially lower as compared to the subject property. The other sites have been identified as non-generators with no reported violations. Based on the information obtained during this investigation and the site vicinity reconnaissance performed, KCE Matrix did not discover or observe subsurface environmental site assessment activity that would indicate potential migration of contamination from other nearby sites towards the subject property.

- Based on the VES conducted during this investigation, a VEC originating from the subject property was not identified. Furthermore, based on the research conducted during this investigation, a VEC originating from other nearby sites in the vicinity for the subject property was not identified.

- KCE Matrix conducted a search of groundwater monitoring data as maintained by the State Water Resources Control Board (SWRCB) – Geotracker database for hydrology information for the site and site vicinity. Based on information maintained for a property located 0.13-mile southeast of the subject property, the depth to groundwater was reported to range between 5.81 feet and 11.23 feet below the surface as stated in the Site Closure Summary reported as prepared in July of 2007. Based on monitoring data collected from wells located at a second site that is approximately 0.78-mile northwest of the subject site, the depth to groundwater was reported to range between 3.66 feet and 5.16 feet below the surface as monitored in February of 2004.

X. SIGNATURE

KCE Matrix appreciates the opportunity to have provided services for this project. Should you have any questions regarding this report and the assessment work performed, please do not hesitate to contact our office at 818-559-5500.

Sincerely,

KCE Matrix, Inc.

Aram B. Kaloustian, P.E.
Project Manager

License No. C52428
Expiration Date: 12/31/24

XI. QUALIFICATIONS

KCE Matrix declares that, to the best of our professional knowledge and belief, we meet the definition of *Environmental Professional* as defined in §312.10 of 40 Code of Federal Regulations (CFR) 312 and we have the specific qualifications based on education, training, and experience to assess a property of the nature, history, and setting of the subject property. We have developed and performed the all appropriate inquiries in conformance with the standards and practices set forth in 40 CFR Part 312. Detailed information with regard to the qualifications of the personnel who have worked on this project is presented in Appendix H of this report.

APPENDIX A

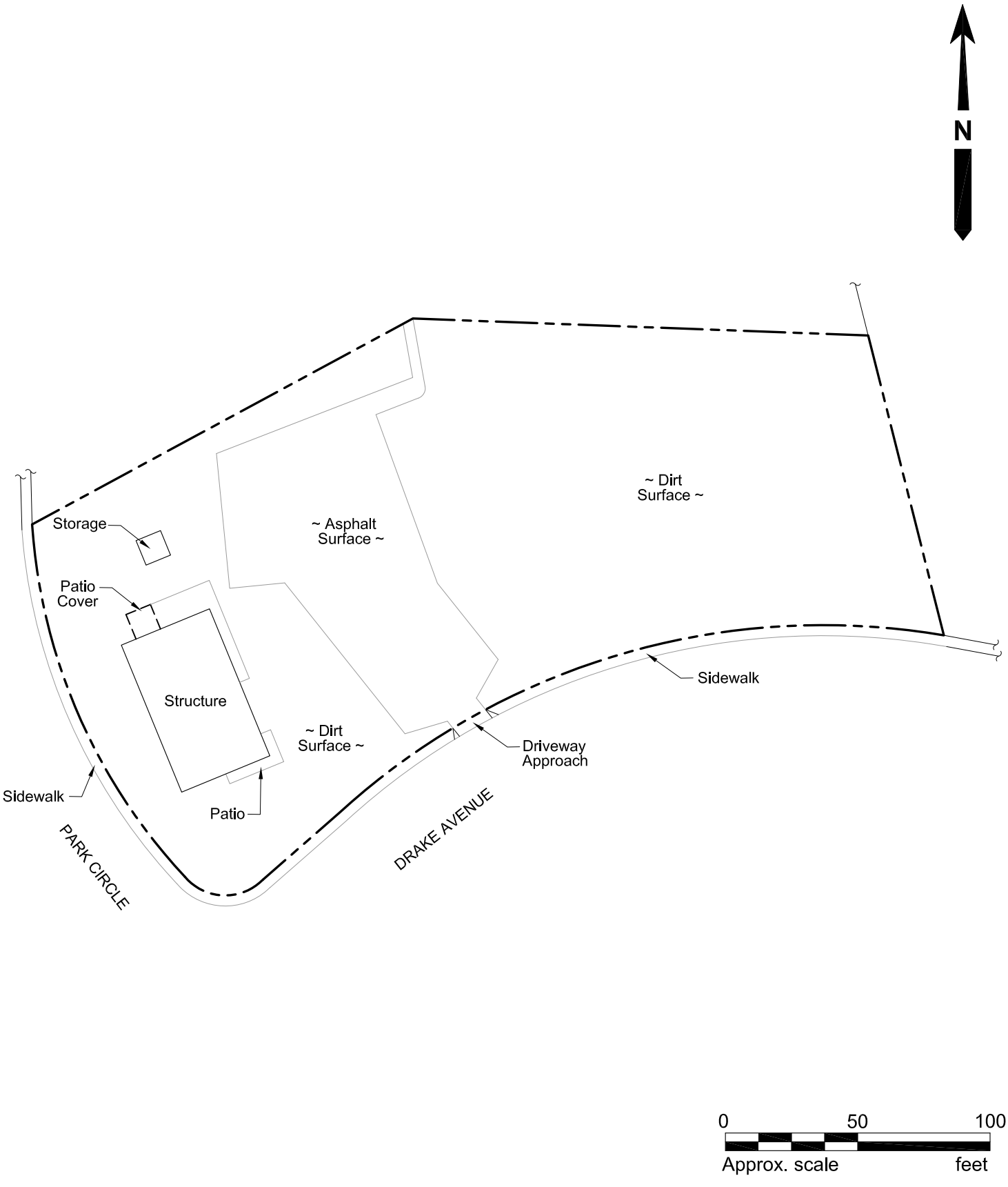
(FIGURES 1 THROUGH 3)

Map Center: Latitude 37.8744, Longitude -122.5139
Subject site is located on the USGS Point Bonita quadrangle (Map Source Year: 2021)

0 0.5 1.0
Approx. scale Mile

LOCATION MAP

KCE MATRIX CONSULTING ENGINEERS STRUCTURAL,CIVIL & ENVIRONMENTAL	COMMERCIAL PROPERTY 825 DRAKE AVENUE SAUSALITO (MARIN CITY), CALIFORNIA	PROJECT ID: KCE-2022-459E FIGURE 1



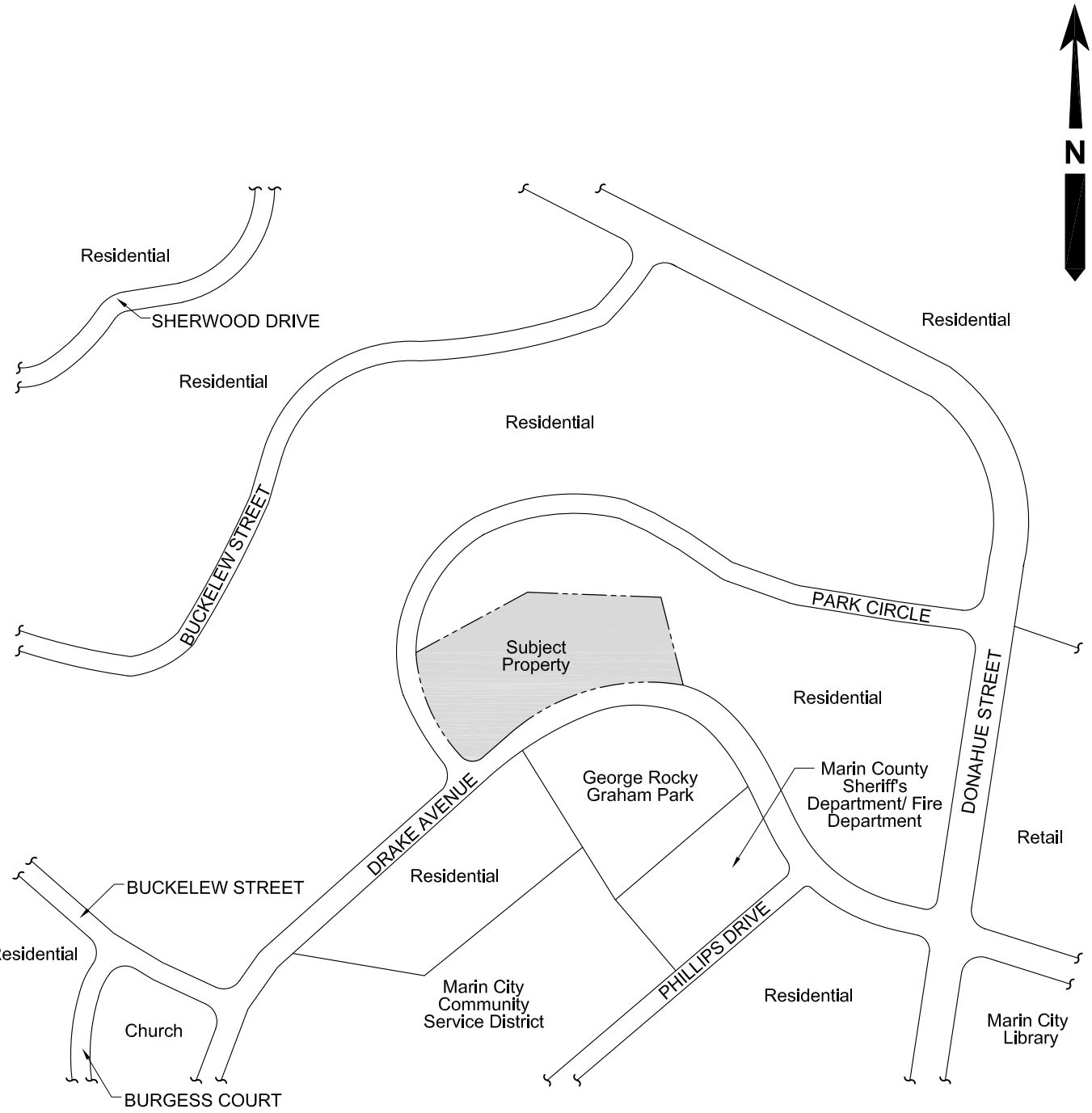
SITE PLAN

KCE MATRIX
CONSULTING ENGINEERS
STRUCTURAL,CIVIL & ENVIRONMENTAL

COMMERCIAL PROPERTY
825 DRAKE AVENUE
SAUSALITO (MARIN CITY), CALIFORNIA

PROJECT ID: KCE-2022-459E

FIGURE 2



SITE VICINITY MAP

KCE MATRIX
CONSULTING ENGINEERS
STRUCTURAL,CIVIL & ENVIRONMENTAL

COMMERCIAL PROPERTY
825 DRAKE AVENUE
SAUSALITO (MARIN CITY), CALIFORNIA

PROJECT ID: KCE-2022-459E

FIGURE 3

APPENDIX B

ENVIRONMENTAL DATA RESOURCES, INC. (EDR)
RADIUS MAP REPORT

Commercial Property
825 Drake Avenue
Sausalito, CA 94965

Inquiry Number: 7216358.2s
January 03, 2023

The EDR Radius Map™ Report with GeoCheck®

6 Armstrong Road, 4th floor
Shelton, CT 06484
Toll Free: 800.352.0050
www.edrnet.com

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Thank you for your business.
Please contact EDR at 1-800-352-0050
with any questions or comments.

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EXECUTIVE SUMMARY

A search of available environmental records was conducted by Environmental Data Resources, Inc (EDR). The report was designed to assist parties seeking to meet the search requirements of EPA's Standards and Practices for All Appropriate Inquiries (40 CFR Part 312), the ASTM Standard Practice for Environmental Site Assessments (E1527-21), the ASTM Standard Practice for Environmental Site Assessments for Forestland or Rural Property (E 2247-16), the ASTM Standard Practice for Limited Environmental Due Diligence: Transaction Screen Process (E 1528-14) or custom requirements developed for the evaluation of environmental risk associated with a parcel of real estate.

TARGET PROPERTY INFORMATION

ADDRESS

825 DRAKE AVENUE
SAUSALITO, CA 94965

COORDINATES

Latitude (North):	37.8745020 - 37ˆ 52' 28.20''
Longitude (West):	122.5139430 - 122ˆ 30' 50.19''
Universal Tranverse Mercator:	Zone 10
UTM X (Meters):	542748.3
UTM Y (Meters):	4191796.8
Elevation:	56 ft. above sea level

USGS TOPOGRAPHIC MAP ASSOCIATED WITH TARGET PROPERTY

Target Property Map:	12016473 POINT BONITA, CA
Version Date:	2018
Northeast Map:	12016489 SAN QUENTIN, CA
Version Date:	2018
Southeast Map:	12016479 SAN FRANCISCO NORTH, CA
Version Date:	2018
Northwest Map:	12016491 SAN RAFAEL, CA
Version Date:	2018

AERIAL PHOTOGRAPHY IN THIS REPORT

Portions of Photo from:	20140608, 20140613
Source:	USDA

MAPPED SITES SUMMARY

Target Property Address:
825 DRAKE AVENUE
SAUSALITO, CA 94965

Click on Map ID to see full detail.

MAP ID	SITE NAME	ADDRESS	DATABASE ACRONYMS	RELATIVE ELEVATION	DIST (ft. & mi.) DIRECTION
A1		825 DRAKE AVE	ERNS		TP
A2	THE VILLAGE BAPTIST	825 DRAKE AVE	HAZNET, HWTS		TP
A3	COUNTY OF MARIN/MARI	850 DRAKE AVENUE	CERS TANKS, CERS	Lower	98, 0.019, SE
A4	MARIN COUNTY FIRE &	850 DRAKE AVE.	UST	Lower	98, 0.019, SE
A5	COUNTY OF MARIN/MARI	850 DRAKE AVENUE	AST	Lower	98, 0.019, SE
A6	MARIN CITY FIREHOUSE	850 DRAKE AVE	SWEEPS UST	Lower	98, 0.019, SE
A7	MARIN CITY FIREHOUSE	850 DRAKE AVE.	HIST UST	Lower	98, 0.019, SE
A8	MARIN CITY FIREHOUSE	850 DRAKE AVE	HIST UST	Lower	98, 0.019, SE
B9	BETTY PRICE	710 DRAKE AVENUE	RCRA NonGen / NLR	Higher	230, 0.044, SSW
B10	BETTY PRICE	710 DRAKE AVE	RCRA NonGen / NLR	Higher	230, 0.044, SSW
B11	MARILYN HUTCHESON	708 DRAKE AVENUE	RCRA NonGen / NLR	Higher	237, 0.045, SSW
C12	SCOTT SHAPIRO	127 BUCKELEW ST	RCRA NonGen / NLR	Lower	516, 0.098, SW
C13	JUDITH C. FOUCHAUX A	121 BUCKELEW ST	RCRA NonGen / NLR	Lower	520, 0.098, SW
D14	WEST MARINE #1299	192 DONAHUE ST	CERS HAZ WASTE, HAZNET, HWTS	Lower	546, 0.103, ESE
D15	WEST MARINE #1299	192 DONAHUE ST	RCRA NonGen / NLR	Lower	546, 0.103, ESE
C16	JOHN COLLINS	74 BUCKELEW STREET	RCRA NonGen / NLR	Lower	574, 0.109, SW
D17	TARGET T3240	180 DONAHUE ST	CERS HAZ WASTE, CERS	Lower	583, 0.110, ESE
D18	CVS PHARMACY #17694	180 DONAHUE ST STE B	RCRA-VSQG	Lower	583, 0.110, ESE
D19	TARGET STORE T3240	180 DONAHUE STREET	RCRA-LQG	Lower	583, 0.110, ESE
D20	CVS PHARMACY #17694	180 DONAHUE ST STE B	CERS HAZ WASTE, HAZNET, HWTS	Lower	583, 0.110, ESE
E21	ROSS DRESS FOR LESS	194 DONAHUE ST	CERS HAZ WASTE, HAZNET, HWTS	Lower	586, 0.111, East
E22	ROSS DRESS FOR LESS	194 DONAHUE ST	RCRA NonGen / NLR	Lower	586, 0.111, East
23	HEADLANDS ONE	269 DONAHUE ST	RCRA NonGen / NLR	Higher	597, 0.113, North
F24	SUMMIT AT SAUSALITO	401 SHERWOOD DR	RCRA NonGen / NLR	Higher	746, 0.141, NNW
F25	ARCHSTONE SAUSALITO	401 SHERWOOD DR	CERS HAZ WASTE, HAZNET, HWTS	Higher	746, 0.141, NNW
G26	MARIN CITY HEALTH AN	630 DRAKE AVE	RCRA NonGen / NLR	Lower	789, 0.149, South
H27	GATEWAY CLEANERS	160 DONAHUE ST STE G	DRYCLEANERS, HWTS	Lower	800, 0.152, SE
H28	APOLLO CLEANERS	160 DONAHUE STREET	CPS-SLIC, BROWNFIELDS, CERS	Lower	800, 0.152, SE
H29	GATEWAY CLEANERS	160 DONAHUE ST UNIT	DRYCLEANERS	Lower	800, 0.152, SE
G30	MANZANITA SCHOOL	620 DRAKE AVE	SWEEPS UST	Lower	913, 0.173, South
G31	SAUSALITO SCHOOL DIS	620 DRAKE AVE.	UST	Lower	913, 0.173, South
G32	MANZANITA SCHOOL	620 DRAKE AVENUE	HIST UST	Lower	913, 0.173, South
33	MARILYN MACKEL	26 BURGESS CT	RCRA NonGen / NLR	Higher	953, 0.180, SW
G34	ALENA MAUNDER	623 DRAKE AVENUE	RCRA NonGen / NLR	Lower	999, 0.189, South
35	SHIRLEY MILLER	16 DUTTON COURT	RCRA NonGen / NLR	Lower	1201, 0.227, South
I36	CVS PHARMACY #9962	150 DONAHUE STREET	CERS HAZ WASTE	Lower	1269, 0.240, SE
I37	CVS PHARMACY # 9962	150 DONAHUE ST	RCRA-LQG	Lower	1269, 0.240, SE
38	FLEA MARKET PROPERTY	100 DONAHUE ST	LUST, Cortese, CERS	Lower	1508, 0.286, SE
39	COMMODORE HELICOPTER	240 BOLINAS AVENUE	ENVIROSTOR	Lower	1597, 0.302, North

MAPPED SITES SUMMARY

Target Property Address:
825 DRAKE AVENUE
SAUSALITO, CA 94965

Click on Map ID to see full detail.

MAP ID	SITE NAME	ADDRESS	DATABASE ACRONYMS	RELATIVE ELEVATION	DIST (ft. & mi.) DIRECTION
40	CALTRANS MANZANITA F	40 SHORELINE HWY	LUST, Cortese, ENF, HIST CORTESE, CERS	Lower	2397, 0.454, NNW
41	EXXON RAS #7-0226	156 SHORE LINE WAY	Notify 65	Lower	2695, 0.510, NNW
42	PHOTO WASTE RECYCLIN	200 GATE 5 ROAD, #11	HWP	Lower	3835, 0.726, ESE
43	GRAHAM'S GARAGE	228 ALMONT	ENVIROSTOR	Lower	4675, 0.885, NW

EXECUTIVE SUMMARY

TARGET PROPERTY SEARCH RESULTS

The target property was identified in the following records. For more information on this property see page 9 of the attached EDR Radius Map report:

Site	Database(s)	EPA ID
825 DRAKE AVE 825 DRAKE AVE SAUSALIDO, CA	ERNS NRC Report #: 926008 Incident Date Time: 2009-12-12 15:30:00	N/A
THE VILLAGE BAPTIST 825 DRAKE AVE MARIN CITY, CA 94965	HAZNET GEPAID: CAC002365527 HWTS	N/A

DATABASES WITH NO MAPPED SITES

No mapped sites were found in EDR's search of available ("reasonably ascertainable ") government records either on the target property or within the search radius around the target property for the following databases:

STANDARD ENVIRONMENTAL RECORDS

Lists of Federal NPL (Superfund) sites

NPL ---------- National Priority List
Proposed NPL ---------- Proposed National Priority List Sites
NPL LIENS ---------- Federal Superfund Liens

Lists of Federal Delisted NPL sites

Delisted NPL ---------- National Priority List Deletions

Lists of Federal sites subject to CERCLA removals and CERCLA orders

FEDERAL FACILITY ---------- Federal Facility Site Information listing
SEMS ---------- Superfund Enterprise Management System

Lists of Federal CERCLA sites with NFRAP

SEMS-ARCHIVE ---------- Superfund Enterprise Management System Archive

Lists of Federal RCRA facilities undergoing Corrective Action

CORRACTS ---------- Corrective Action Report

Lists of Federal RCRA TSD facilities

RCRA-TSDF ---------- RCRA - Treatment, Storage and Disposal

Lists of Federal RCRA generators

RCRA-SQG ---------- RCRA - Small Quantity Generators

Federal institutional controls / engineering controls registries

LUCIS ---------- Land Use Control Information System
US ENG CONTROLS ---------- Engineering Controls Sites List
US INST CONTROLS ---------- Institutional Controls Sites List

Lists of state- and tribal (Superfund) equivalent sites

RESPONSE ---------- State Response Sites

Lists of state and tribal landfills and solid waste disposal facilities

SWF/LF ---------- Solid Waste Information System

Lists of state and tribal leaking storage tanks

INDIAN LUST ---------- Leaking Underground Storage Tanks on Indian Land

Lists of state and tribal registered storage tanks

FEMA UST ---------- Underground Storage Tank Listing
INDIAN UST ---------- Underground Storage Tanks on Indian Land

Lists of state and tribal voluntary cleanup sites

VCP ---------- Voluntary Cleanup Program Properties
INDIAN VCP ---------- Voluntary Cleanup Priority Listing

ADDITIONAL ENVIRONMENTAL RECORDS

Local Brownfield lists

US BROWNFIELDS ---------- A Listing of Brownfields Sites

Local Lists of Landfill / Solid Waste Disposal Sites

WMUDS/SWAT ---------- Waste Management Unit Database
SWRCY ---------- Recycler Database
HAULERS ---------- Registered Waste Tire Haulers Listing
INDIAN ODI ---------- Report on the Status of Open Dumps on Indian Lands
DEBRIS REGION 9 ---------- Torres Martinez Reservation Illegal Dump Site Locations
ODI ---------- Open Dump Inventory
IHS OPEN DUMPS ---------- Open Dumps on Indian Land

Local Lists of Hazardous waste / Contaminated Sites

US HIST CDL ---------- Delisted National Clandestine Laboratory Register
HIST Cal-Sites ---------- Historical Calsites Database
SCH ---------- School Property Evaluation Program

CDL	Clandestine Drug Labs
Toxic Pits	Toxic Pits Cleanup Act Sites
US CDL	National Clandestine Laboratory Register

Local Lists of Registered Storage Tanks

CA FID UST	Facility Inventory Database

Local Land Records

LIENS	Environmental Liens Listing
LIENS 2	CERCLA Lien Information
DEED	Deed Restriction Listing

Records of Emergency Release Reports

HMIRS	Hazardous Materials Information Reporting System
CHMIRS	California Hazardous Material Incident Report System
LDS	Land Disposal Sites Listing
MCS	Military Cleanup Sites Listing
SPILLS 90	SPILLS 90 data from FirstSearch

Other Ascertainable Records

FUDS	Formerly Used Defense Sites
DOD	Department of Defense Sites
SCRD DRYCLEANERS	State Coalition for Remediation of Drycleaners Listing
US FIN ASSUR	Financial Assurance Information
EPA WATCH LIST	EPA WATCH LIST
2020 COR ACTION	2020 Corrective Action Program List
TSCA	Toxic Substances Control Act
TRIS	Toxic Chemical Release Inventory System
SSTS	Section 7 Tracking Systems
ROD	Records Of Decision
RMP	Risk Management Plans
RAATS	RCRA Administrative Action Tracking System
PRP	Potentially Responsible Parties
PADS	PCB Activity Database System
ICIS	Integrated Compliance Information System
FTTS	FIFRA/ TSCA Tracking System - FIFRA (Federal Insecticide, Fungicide, & Rodenticide Act)/TSCA (Toxic Substances Control Act)
MLTS	Material Licensing Tracking System
COAL ASH DOE	Steam-Electric Plant Operation Data
COAL ASH EPA	Coal Combustion Residues Surface Impoundments List
PCB TRANSFORMER	PCB Transformer Registration Database
RADINFO	Radiation Information Database
HIST FTTS	FIFRA/TSCA Tracking System Administrative Case Listing
DOT OPS	Incident and Accident Data
CONSENT	Superfund (CERCLA) Consent Decrees
INDIAN RESERV	Indian Reservations
FUSRAP	Formerly Utilized Sites Remedial Action Program
UMTRA	Uranium Mill Tailings Sites
LEAD SMELTERS	Lead Smelter Sites
US AIRS	Aerometric Information Retrieval System Facility Subsystem
US MINES	Mines Master Index File

EXECUTIVE SUMMARY

ABANDONED MINES - Abandoned Mines
FINDS - Facility Index System/Facility Registry System
ECHO - Enforcement & Compliance History Information
DOCKET HWC - Hazardous Waste Compliance Docket Listing
UXO - Unexploded Ordnance Sites
FUELS PROGRAM - EPA Fuels Program Registered Listing
PFAS NPL - Superfund Sites with PFAS Detections Information
PFAS FEDERAL SITES - Federal Sites PFAS Information
PFAS TSCA - PFAS Manufacture and Imports Information
PFAS RCRA MANIFEST - PFAS Transfers Identified In the RCRA Database Listing
PFAS ATSDR - PFAS Contamination Site Location Listing
PFAS WQP - Ambient Environmental Sampling for PFAS
PFAS NPDES - Clean Water Act Discharge Monitoring Information
PFAS ECHO - Facilities in Industries that May Be Handling PFAS Listing
PFAS ECHO FIRE TRAINING - Facilities in Industries that May Be Handling PFAS Listing
PFAS PART 139 AIRPORT - All Certified Part 139 Airports PFAS Information Listing
AQUEOUS FOAM NRC - Aqueous Foam Related Incidents Listing
PFAS - PFAS Contamination Site Location Listing
AQUEOUS FOAM - Former Fire Training Facility Assessments Listing
CA BOND EXP. PLAN - Bond Expenditure Plan
CUPA Listings - CUPA Resources List
EMI - Emissions Inventory Data
ENF - Enforcement Action Listing
Financial Assurance - Financial Assurance Information Listing
ICE - ICE
HWT - Registered Hazardous Waste Transporter Database
MINES - Mines Site Location Listing
MWMP - Medical Waste Management Program Listing
NPDES - NPDES Permits Listing
PEST LIC - Pesticide Regulation Licenses Listing
PROC - Certified Processors Database
UIC - UIC Listing
UIC GEO - UIC GEO (GEOTRACKER)
WASTEWATER PITS - Oil Wastewater Pits Listing
WDS - Waste Discharge System
WIP - Well Investigation Program Case List
MILITARY PRIV SITES - MILITARY PRIV SITES (GEOTRACKER)
PROJECT - PROJECT (GEOTRACKER)
WDR - Waste Discharge Requirements Listing
CIWQS - California Integrated Water Quality System
CERS - CERS
NON-CASE INFO - NON-CASE INFO (GEOTRACKER)
OTHER OIL GAS - OTHER OIL & GAS (GEOTRACKER)
PROD WATER PONDS - PROD WATER PONDS (GEOTRACKER)
SAMPLING POINT - SAMPLING POINT (GEOTRACKER)
WELL STIM PROJ - Well Stimulation Project (GEOTRACKER)
MINES MRDS - Mineral Resources Data System

EDR HIGH RISK HISTORICAL RECORDS

EDR Exclusive Records

EDR MGP - EDR Proprietary Manufactured Gas Plants
EDR Hist Auto - EDR Exclusive Historical Auto Stations

EXECUTIVE SUMMARY

EDR Hist Cleaner..... EDR Exclusive Historical Cleaners

EDR RECOVERED GOVERNMENT ARCHIVES

Exclusive Recovered Govt. Archives

RGA LF..... Recovered Government Archive Solid Waste Facilities List
RGA LUST..... Recovered Government Archive Leaking Underground Storage Tank

SURROUNDING SITES: SEARCH RESULTS

Surrounding sites were identified in the following databases.

Elevations have been determined from the USGS Digital Elevation Model and should be evaluated on a relative (not an absolute) basis. Relative elevation information between sites of close proximity should be field verified. Sites with an elevation equal to or higher than the target property have been differentiated below from sites with an elevation lower than the target property.
Page numbers and map identification numbers refer to the EDR Radius Map report where detailed data on individual sites can be reviewed.

Sites listed in ***bold italics*** are in multiple databases.

Unmappable (orphan) sites are not considered in the foregoing analysis.

STANDARD ENVIRONMENTAL RECORDS

Lists of Federal RCRA generators

RCRA-LQG: RCRAInfo is EPA's comprehensive information system, providing access to data supporting the Resource Conservation and Recovery Act (RCRA) of 1976 and the Hazardous and Solid Waste Amendments (HSWA) of 1984. The database includes selective information on sites which generate, transport, store, treat and/or dispose of hazardous waste as defined by the Resource Conservation and Recovery Act (RCRA). Large quantity generators (LQGs) generate over 1,000 kilograms (kg) of hazardous waste, or over 1 kg of acutely hazardous waste per month.

A review of the RCRA-LQG list, as provided by EDR, and dated 11/21/2022 has revealed that there are 2 RCRA-LQG sites within approximately 0.25 miles of the target property.

Lower Elevation	Address	Direction / Distance	Map ID	Page
TARGET STORE T3240 EPA ID:: CAR000269704	180 DONAHUE STREET	ESE 0 - 1/8 (0.110 mi.)	D19	110
CVS PHARMACY # 9962 EPA ID:: CAR000240622	150 DONAHUE ST	SE 1/8 - 1/4 (0.240 mi.)	I37	216

RCRA-VSQG: RCRAInfo is EPA's comprehensive information system, providing access to data supporting the Resource Conservation and Recovery Act (RCRA) of 1976 and the Hazardous and Solid Waste Amendments (HSWA) of 1984. The database includes selective information on sites which generate, transport, store, treat and/or dispose of hazardous waste as defined by the Resource Conservation and Recovery Act (RCRA). Very small quantity generators (VSQGs) generate less than 100 kg of hazardous waste, or less than 1 kg of acutely hazardous waste per month.

A review of the RCRA-VSQG list, as provided by EDR, and dated 11/21/2022 has revealed that there is 1

RCRA-VSQG site within approximately 0.25 miles of the target property.

Lower Elevation	Address	Direction / Distance	Map ID	Page
CVS PHARMACY #17694 EPA ID:: CAR000272377	180 DONAHUE ST STE B	ESE 0 - 1/8 (0.110 mi.)	D18	107

Lists of state- and tribal hazardous waste facilities

ENVIROSTOR: The Department of Toxic Substances Control's (DTSC's) Site Mitigation and Brownfields Reuse Program's (SMBRP's) EnviroStor database identifes sites that have known contamination or sites for which there may be reasons to investigate further. The database includes the following site types: Federal Superfund sites (National Priorities List (NPL)); State Response, including Military Facilities and State Superfund; Voluntary Cleanup; and School sites. EnviroStor provides similar information to the information that was available in CalSites, and provides additional site information, including, but not limited to, identification of formerly-contaminated properties that have been released for reuse, properties where environmental deed restrictions have been recorded to prevent inappropriate land uses, and risk characterization information that is used to assess potential impacts to public health and the environment at contaminated sites.

A review of the ENVIROSTOR list, as provided by EDR, and dated 07/25/2022 has revealed that there are 2 ENVIROSTOR sites within approximately 1 mile of the target property.

Lower Elevation	Address	Direction / Distance	Map ID	Page
COMMODORE HELICOPTER Facility Id: 21450003 Status: Refer: Other Agency	240 BOLINAS AVENUE	N 1/4 - 1/2 (0.302 mi.)	39	228
GRAHAM'S GARAGE Facility Id: 21750009 Status: Refer: Other Agency	228 ALMONT	NW 1/2 - 1 (0.885 mi.)	43	236

Lists of state and tribal leaking storage tanks

LUST: Leaking Underground Storage Tank (LUST) Sites included in GeoTracker. GeoTracker is the Water Boards data management system for sites that impact, or have the potential to impact, water quality in California, with emphasis on groundwater.

A review of the LUST list, as provided by EDR, has revealed that there are 2 LUST sites within approximately 0.5 miles of the target property.

Lower Elevation	Address	Direction / Distance	Map ID	Page
FLEA MARKET PROPERTY Database: LUST REG 2, Date of Government Version: 09/30/2004 Database: LUST, Date of Government Version: 08/31/2022 Status: Completed - Case Closed Facility Id: 21-0052 Facility Status: Case Closed Global Id: T0604100332 date9: 6/12/1997	***100 DONAHUE ST***	***SE 1/4 - 1/2 (0.286 mi.)***	***38***	***223***
CALTRANS MANZANITA F Database: LUST REG 2, Date of Government Version: 09/30/2004 Database: LUST, Date of Government Version: 08/31/2022	***40 SHORELINE HWY***	***NNW 1/4 - 1/2 (0.454 mi.)***	***40***	***229***

Status: Completed - Case Closed
Facility Id: 21-0314
Facility Status: Case Closed
Global Id: T0604100296
date9: 6/8/1998

CPS-SLIC: Cleanup Program Sites (CPS; also known as Site Cleanups [SC] and formerly known as Spills, Leaks, Investigations, and Cleanups [SLIC] sites) included in GeoTracker. GeoTracker is the Water Boards data management system for sites that impact, or have the potential to impact, water quality in California, with emphasis on groundwater.

A review of the CPS-SLIC list, as provided by EDR, has revealed that there is 1 CPS-SLIC site within approximately 0.5 miles of the target property.

Lower Elevation	Address	Direction / Distance	Map ID	Page
APOLLO CLEANERS	***160 DONAHUE STREET***	***SE 1/8 - 1/4 (0.152 mi.)***	***H28***	***200***
Database: CPS-SLIC, Date of Government Version: 08/31/2022 Facility Status: Completed - Case Closed Global Id: SL0604181210				

Lists of state and tribal registered storage tanks

UST: The Underground Storage Tank database contains registered USTs. USTs are regulated under Subtitle I of the Resource Conservation and Recovery Act (RCRA). The data come from the State Water Resources Control Board's Hazardous Substance Storage Container Database.

A review of the UST list, as provided by EDR, has revealed that there are 2 UST sites within approximately 0.25 miles of the target property.

Lower Elevation	Address	Direction / Distance	Map ID	Page
MARIN COUNTY FIRE &	850 DRAKE AVE.	SE 0 - 1/8 (0.019 mi.)	A4	18
Database: UST, Date of Government Version: 08/31/2022 Database: MARIN CO. UST, Date of Government Version: 09/26/2018 Facility Id: 60-0277 Facility Id: 600277 Tank Status: UST Removal				
SAUSALITO SCHOOL DIS	620 DRAKE AVE.	S 1/8 - 1/4 (0.173 mi.)	G31	203
Database: MARIN CO. UST, Date of Government Version: 09/26/2018				

AST: A listing of aboveground storage tank petroleum storage tank locations.

A review of the AST list, as provided by EDR, has revealed that there is 1 AST site within approximately 0.25 miles of the target property.

Lower Elevation	Address	Direction / Distance	Map ID	Page
COUNTY OF MARIN/MARI	850 DRAKE AVENUE	SE 0 - 1/8 (0.019 mi.)	A5	20
Database: AST, Date of Government Version: 07/06/2016				

Lists of state and tribal brownfield sites

BROWNFIELDS: A listing of sites the SWRCB considers to be Brownfields since these are sites have come to them through the MOA Process.

A review of the BROWNFIELDS list, as provided by EDR, and dated 09/19/2022 has revealed that there is 1 BROWNFIELDS site within approximately 0.5 miles of the target property.

Lower Elevation	Address	Direction / Distance	Map ID	Page
APOLLO CLEANERS	***160 DONAHUE STREET***	***SE 1/8 - 1/4 (0.152 mi.)***	***H28***	***200***

ADDITIONAL ENVIRONMENTAL RECORDS

Local Lists of Hazardous waste / Contaminated Sites

CERS HAZ WASTE: List of sites in the California Environmental Protection Agency (CalEPA) Regulated Site Portal which fall under the Hazardous Chemical Management, Hazardous Waste Onsite Treatment, Household Hazardous Waste Collection, Hazardous Waste Generator, and RCRA LQ HW Generator programs.

A review of the CERS HAZ WASTE list, as provided by EDR, and dated 07/18/2022 has revealed that there are 6 CERS HAZ WASTE sites within approximately 0.25 miles of the target property.

Equal/Higher Elevation	Address	Direction / Distance	Map ID	Page
ARCHSTONE SAUSALITO	***401 SHERWOOD DR***	***NNW 1/8 - 1/4 (0.141 mi.)***	***F25***	***193***

Lower Elevation	Address	Direction / Distance	Map ID	Page
WEST MARINE #1299	***192 DONAHUE ST***	***ESE 0 - 1/8 (0.103 mi.)***	***D14***	***35***
TARGET T3240	***180 DONAHUE ST***	***ESE 0 - 1/8 (0.110 mi.)***	***D17***	***105***
CVS PHARMACY #17694	***180 DONAHUE ST STE B***	***ESE 0 - 1/8 (0.110 mi.)***	***D20***	***115***
ROSS DRESS FOR LESS	***194 DONAHUE ST***	***E 0 - 1/8 (0.111 mi.)***	***E21***	***143***
CVS PHARMACY #9962	150 DONAHUE STREET	SE 1/8 - 1/4 (0.240 mi.)	I36	212

Local Lists of Registered Storage Tanks

SWEEPS UST: Statewide Environmental Evaluation and Planning System. This underground storage tank listing was updated and maintained by a company contacted by the SWRCB in the early 1990's. The listing is no longer updated or maintained. The local agency is the contact for more information on a site on the SWEEPS list.

A review of the SWEEPS UST list, as provided by EDR, and dated 06/01/1994 has revealed that there are 2 SWEEPS UST sites within approximately 0.25 miles of the target property.

Lower Elevation	Address	Direction / Distance	Map ID	Page
MARIN CITY FIREHOUSE Status: A Tank Status: A Comp Number: 36889	850 DRAKE AVE	SE 0 - 1/8 (0.019 mi.)	A6	21
MANZANITA SCHOOL	620 DRAKE AVE	S 1/8 - 1/4 (0.173 mi.)	G30	203

Status: A
Tank Status: A
Comp Number: 58573

HIST UST: Historical UST Registered Database.

A review of the HIST UST list, as provided by EDR, and dated 10/15/1990 has revealed that there are 3 HIST UST sites within approximately 0.25 miles of the target property.

Lower Elevation	Address	Direction / Distance	Map ID	Page
MARIN CITY FIREHOUSE Facility Id: 00000036889	850 DRAKE AVE.	SE 0 - 1/8 (0.019 mi.)	A7	21
MARIN CITY FIREHOUSE	850 DRAKE AVE	SE 0 - 1/8 (0.019 mi.)	A8	22
MANZANITA SCHOOL Facility Id: 00000058573	620 DRAKE AVENUE	S 1/8 - 1/4 (0.173 mi.)	G32	204

CERS TANKS: List of sites in the California Environmental Protection Agency (CalEPA) Regulated Site Portal which fall under the Aboveground Petroleum Storage and Underground Storage Tank regulatory programs.

A review of the CERS TANKS list, as provided by EDR, and dated 07/18/2022 has revealed that there is 1 CERS TANKS site within approximately 0.25 miles of the target property.

Lower Elevation	Address	Direction / Distance	Map ID	Page
COUNTY OF MARIN/MARI	***850 DRAKE AVENUE***	***SE 0 - 1/8 (0.019 mi.)***	***A3***	***15***

Other Ascertainable Records

RCRA NonGen / NLR: RCRAInfo is EPA's comprehensive information system, providing access to data supporting the Resource Conservation and Recovery Act (RCRA) of 1976 and the Hazardous and Solid Waste Amendments (HSWA) of 1984. The database includes selective information on sites which generate, transport, store, treat and/or dispose of hazardous waste as defined by the Resource Conservation and Recovery Act (RCRA). Non-Generators do not presently generate hazardous waste.

A review of the RCRA NonGen / NLR list, as provided by EDR, and dated 11/21/2022 has revealed that there are 14 RCRA NonGen / NLR sites within approximately 0.25 miles of the target property.

Equal/Higher Elevation	Address	Direction / Distance	Map ID	Page
BETTY PRICE EPA ID:: CAC003119711	710 DRAKE AVENUE	SSW 0 - 1/8 (0.044 mi.)	B9	22
BETTY PRICE EPA ID:: CAC003059611	710 DRAKE AVE	SSW 0 - 1/8 (0.044 mi.)	B10	25
MARILYN HUTCHESON EPA ID:: CAC003102650	708 DRAKE AVENUE	SSW 0 - 1/8 (0.045 mi.)	B11	27
HEADLANDS ONE EPA ID:: CAC003019118	269 DONAHUE ST	N 0 - 1/8 (0.113 mi.)	23	188
SUMMIT AT SAUSALITO	401 SHERWOOD DR	NNW 1/8 - 1/4 (0.141 mi.)	F24	191

EPA ID:: CAL000453180

MARILYN MACKEL EPA ID:: CAC002990188	26 BURGESS CT	SW 1/8 - 1/4 (0.180 mi.)	33	204

Lower Elevation	Address	Direction / Distance	Map ID	Page
SCOTT SHAPIRO EPA ID:: CAC003031220	127 BUCKELEW ST	SW 0 - 1/8 (0.098 mi.)	C12	30
JUDITH C. FOUCHAUX A EPA ID:: CAC003183561	121 BUCKELEW ST	SW 0 - 1/8 (0.098 mi.)	C13	32
WEST MARINE #1299 EPA ID:: CAL000398601	192 DONAHUE ST	ESE 0 - 1/8 (0.103 mi.)	D15	100
JOHN COLLINS EPA ID:: CAC003135332	74 BUCKELEW STREET	SW 0 - 1/8 (0.109 mi.)	C16	102
ROSS DRESS FOR LESS EPA ID:: CAL000397452	194 DONAHUE ST	E 0 - 1/8 (0.111 mi.)	E22	186
MARIN CITY HEALTH AN EPA ID:: CAL000440278	630 DRAKE AVE	S 1/8 - 1/4 (0.149 mi.)	G26	196
ALENA MAUNDER EPA ID:: CAC003157915	623 DRAKE AVENUE	S 1/8 - 1/4 (0.189 mi.)	G34	207
SHIRLEY MILLER EPA ID:: CAC003145446	16 DUTTON COURT	S 1/8 - 1/4 (0.227 mi.)	35	209

Cortese: The sites for the list are designated by the State Water Resource Control Board (LUST), the Integrated Waste Board (SWF/LS), and the Department of Toxic Substances Control (Cal-Sites).

A review of the Cortese list, as provided by EDR, and dated 09/19/2022 has revealed that there are 2 Cortese sites within approximately 0.5 miles of the target property.

Lower Elevation	Address	Direction / Distance	Map ID	Page
FLEA MARKET PROPERTY Cleanup Status: COMPLETED - CASE CLOSED	***100 DONAHUE ST***	***SE 1/4 - 1/2 (0.286 mi.)***	***38***	***223***
CALTRANS MANZANITA F Cleanup Status: COMPLETED - CASE CLOSED	***40 SHORELINE HWY***	***NNW 1/4 - 1/2 (0.454 mi.)***	***40***	***229***

DRYCLEANERS: A list of drycleaner related facilities that have EPA ID numbers. These are facilities with certain SIC codes: power laundries, family and commercial; garment pressing and cleaners' agents; linen supply; coin-operated laundries and cleaning; drycleaning plants except rugs; carpet and upholster cleaning; industrial launderers; laundry and garment services.

A review of the DRYCLEANERS list, as provided by EDR, has revealed that there are 2 DRYCLEANERS sites within approximately 0.25 miles of the target property.

Lower Elevation	Address	Direction / Distance	Map ID	Page
GATEWAY CLEANERS Database: DRYCLEANERS, Date of Government Version: 08/27/2021 EPA Id: CAL000353366	***160 DONAHUE ST STE G***	***SE 1/8 - 1/4 (0.152 mi.)***	***H27***	***199***
GATEWAY CLEANERS Database: DRYCLEANERS, Date of Government Version: 08/27/2021	160 DONAHUE ST UNIT	SE 1/8 - 1/4 (0.152 mi.)	H29	202

EPA Id: CAL000292067
EPA Id: CAL000145142

HIST CORTESE: The sites for the list are designated by the State Water Resource Control Board [LUST], the Integrated Waste Board [SWF/LS], and the Department of Toxic Substances Control [CALSITES]. This listing is no longer updated by the state agency.

A review of the HIST CORTESE list, as provided by EDR, and dated 04/01/2001 has revealed that there is 1 HIST CORTESE site within approximately 0.5 miles of the target property.

Lower Elevation	Address	Direction / Distance	Map ID	Page
CALTRANS MANZANITA F	***40 SHORELINE HWY***	***NNW 1/4 - 1/2 (0.454 mi.)***	***40***	***229***
Reg Id: 21-0314				

HWP: Detailed information on permitted hazardous waste facilities and corrective action ("cleanups") tracked in EnviroStor.

A review of the HWP list, as provided by EDR, and dated 08/11/2022 has revealed that there is 1 HWP site within approximately 1 mile of the target property.

Lower Elevation	Address	Direction / Distance	Map ID	Page
PHOTO WASTE RECYCLIN	200 GATE 5 ROAD, #11	ESE 1/2 - 1 (0.726 mi.)	42	234
EPA ID: CAD981161367				
Cleanup Status: CLOSED				

Notify 65: Listings of all Proposition 65 incidents reported to counties by the State Water Resources Control Board and the Regional Water Quality Control Board. This database is no longer updated by the reporting agency.

A review of the Notify 65 list, as provided by EDR, and dated 09/07/2022 has revealed that there is 1 Notify 65 site within approximately 1 mile of the target property.

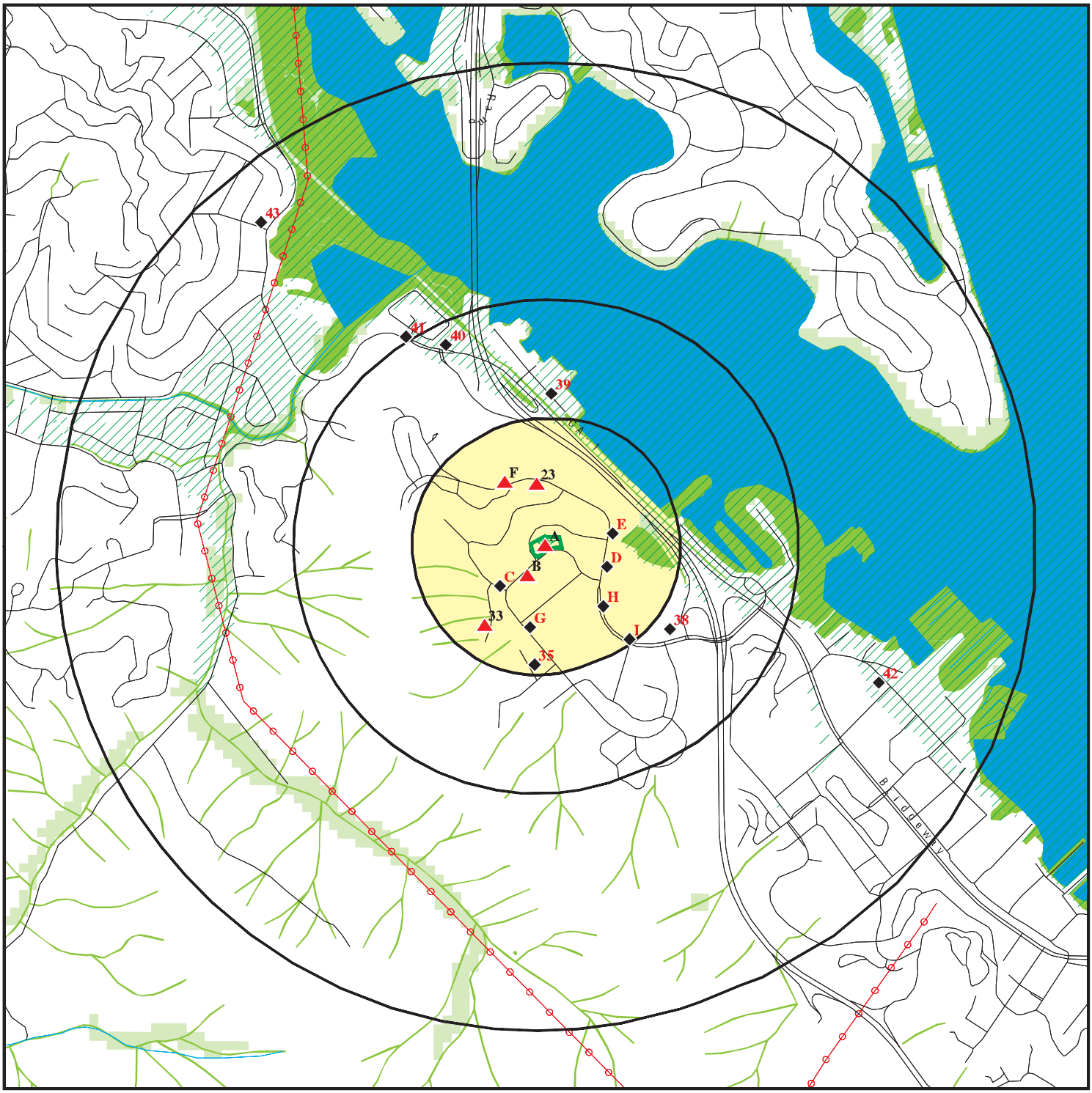
Lower Elevation	Address	Direction / Distance	Map ID	Page
EXXON RAS #7-0226	156 SHORE LINE WAY	NNW 1/2 - 1 (0.510 mi.)	41	234

EXECUTIVE SUMMARY

Due to poor or inadequate address information, the following sites were not mapped. Count: 1 records.

Site Name	Database(s)
ONE MEDICAL GROUP, INC. - STRAWBER	CERS HAZ WASTE

OVERVIEW MAP - 7216358.2S



Target Property

Sites at elevations higher than or equal to the target property

Sites at elevations lower than the target property

Manufactured Gas Plants

National Priority List Sites

Dept. Defense Sites

0 1/4 1/2 1 Miles

Indian Reservations BIA

Power transmission lines

Special Flood Hazard Area (1%)

0.2% Annual Chance Flood Hazard

National Wetland Inventory

State Wetlands

Areas of Concern

This report includes Interactive Map Layers to display and/or hide map information. The legend includes only those icons for the default map view.

SITE NAME: Commercial Property	CLIENT: KCE Matrix
ADDRESS: 825 Drake Avenue Sausalito CA 94965	CONTACT: Aram Kaloustian INQUIRY #: 7216358.2s
LAT/LONG: 37.874502 / 122.513943	DATE: January 03, 2023 7:20 pm

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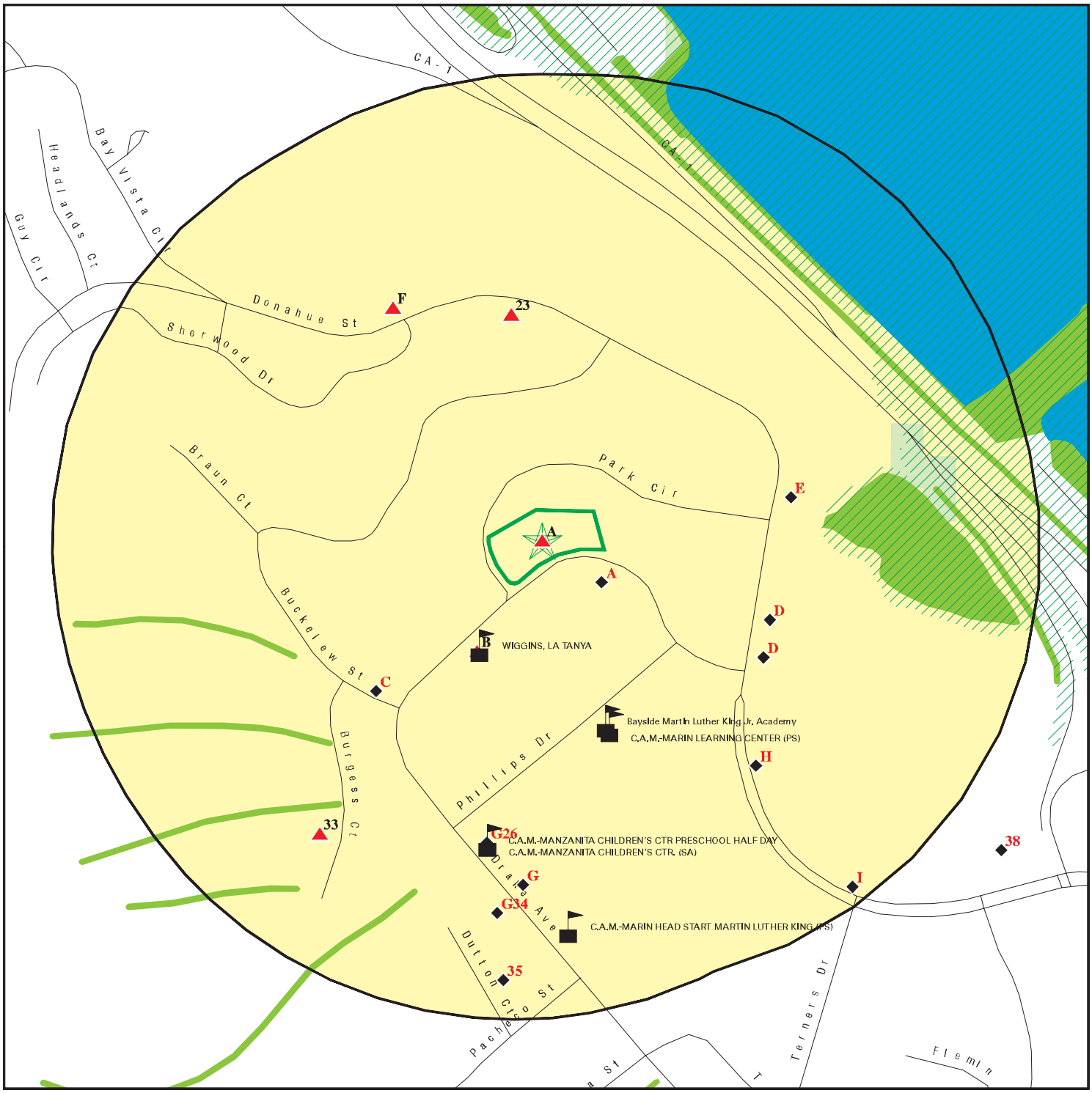
DETAIL MAP - 7216358.2S



Target Property
Sites at elevations higher than or equal to the target property
Sites at elevations lower than the target property
Manufactured Gas Plants
Sensitive Receptors
National Priority List Sites
Dept. Defense Sites

0 1/16 1/8 1/4 Miles

Indian Reservations BIA
Special Flood Hazard Area (1%)
0.2% Annual Chance Flood Hazard
National Wetland Inventory
State Wetlands

Areas of Concern

This report includes Interactive Map Layers to display and/or hide map information. The legend includes only those icons for the default map view.

SITE NAME: Commercial Property	CLIENT: KCE Matrix
ADDRESS: 825 Drake Avenue Sausalito CA 94965	CONTACT: Aram Kaloustian INQUIRY #: 7216358.2s
LAT/LONG: 37.874502 / 122.513943	DATE: January 03, 2023 7:22 pm

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MAP FINDINGS SUMMARY

Database	Search Distance (Miles)	Target Property	< 1/8	1/8 - 1/4	1/4 - 1/2	1/2 - 1	> 1	Total Plotted
STANDARD ENVIRONMENTAL RECORDS								
Lists of Federal NPL (Superfund) sites								
NPL	1.000		0	0	0	0	NR	0
Proposed NPL	1.000		0	0	0	0	NR	0
NPL LIENS	1.000		0	0	0	0	NR	0
Lists of Federal Delisted NPL sites								
Delisted NPL	1.000		0	0	0	0	NR	0
Lists of Federal sites subject to CERCLA removals and CERCLA orders								
FEDERAL FACILITY	0.500		0	0	0	NR	NR	0
SEMS	0.500		0	0	0	NR	NR	0
Lists of Federal CERCLA sites with NFRAP								
SEMS-ARCHIVE	0.500		0	0	0	NR	NR	0
Lists of Federal RCRA facilities undergoing Corrective Action								
CORRACTS	1.000		0	0	0	0	NR	0
Lists of Federal RCRA TSD facilities								
RCRA-TSDF	0.500		0	0	0	NR	NR	0
Lists of Federal RCRA generators								
RCRA-LQG	0.250		1	1	NR	NR	NR	2
RCRA-SQG	0.250		0	0	NR	NR	NR	0
RCRA-VSQG	0.250		1	0	NR	NR	NR	1
Federal institutional controls / engineering controls registries								
LUCIS	0.500		0	0	0	NR	NR	0
US ENG CONTROLS	0.500		0	0	0	NR	NR	0
US INST CONTROLS	0.500		0	0	0	NR	NR	0
Federal ERNS list								
ERNS	0.001	1	0	NR	NR	NR	NR	1
Lists of state- and tribal (Superfund) equivalent sites								
RESPONSE	1.000		0	0	0	0	NR	0
Lists of state- and tribal hazardous waste facilities								
ENVIROSTOR	1.000		0	0	1	1	NR	2
Lists of state and tribal landfills and solid waste disposal facilities								
SWF/LF	0.500		0	0	0	NR	NR	0

MAP FINDINGS SUMMARY

Database	Search Distance (Miles)	Target Property	< 1/8	1/8 - 1/4	1/4 - 1/2	1/2 - 1	> 1	Total Plotted
Lists of state and tribal leaking storage tanks								
LUST	0.500		0	0	2	NR	NR	2
INDIAN LUST	0.500		0	0	0	NR	NR	0
CPS-SLIC	0.500		0	1	0	NR	NR	1
Lists of state and tribal registered storage tanks								
FEMA UST	0.250		0	0	NR	NR	NR	0
UST	0.250		1	1	NR	NR	NR	2
AST	0.250		1	0	NR	NR	NR	1
INDIAN UST	0.250		0	0	NR	NR	NR	0
Lists of state and tribal voluntary cleanup sites								
VCP	0.500		0	0	0	NR	NR	0
INDIAN VCP	0.500		0	0	0	NR	NR	0
Lists of state and tribal brownfield sites								
BROWNFIELDS	0.500		0	1	0	NR	NR	1
ADDITIONAL ENVIRONMENTAL RECORDS								
Local Brownfield lists								
US BROWNFIELDS	0.500		0	0	0	NR	NR	0
Local Lists of Landfill / Solid Waste Disposal Sites								
WMUDS/SWAT	0.500		0	0	0	NR	NR	0
SWRCY	0.500		0	0	0	NR	NR	0
HAULERS	0.001		0	NR	NR	NR	NR	0
INDIAN ODI	0.500		0	0	0	NR	NR	0
DEBRIS REGION 9	0.500		0	0	0	NR	NR	0
ODI	0.500		0	0	0	NR	NR	0
IHS OPEN DUMPS	0.500		0	0	0	NR	NR	0
Local Lists of Hazardous waste / Contaminated Sites								
US HIST CDL	0.001		0	NR	NR	NR	NR	0
HIST Cal-Sites	1.000		0	0	0	0	NR	0
SCH	0.250		0	0	NR	NR	NR	0
CDL	0.001		0	NR	NR	NR	NR	0
Toxic Pits	1.000		0	0	0	0	NR	0
CERS HAZ WASTE	0.250		4	2	NR	NR	NR	6
US CDL	0.001		0	NR	NR	NR	NR	0
Local Lists of Registered Storage Tanks								
SWEEPS UST	0.250		1	1	NR	NR	NR	2
HIST UST	0.250		2	1	NR	NR	NR	3
CERS TANKS	0.250		1	0	NR	NR	NR	1
CA FID UST	0.250		0	0	NR	NR	NR	0
Local Land Records								
LIENS	0.001		0	NR	NR	NR	NR	0

MAP FINDINGS SUMMARY

Database	Search Distance (Miles)	Target Property	< 1/8	1/8 - 1/4	1/4 - 1/2	1/2 - 1	> 1	Total Plotted
LIENS 2	0.001		0	NR	NR	NR	NR	0
DEED	0.500		0	0	0	NR	NR	0
Records of Emergency Release Reports								
HMIRS	0.001		0	NR	NR	NR	NR	0
CHMIRS	0.001		0	NR	NR	NR	NR	0
LDS	0.001		0	NR	NR	NR	NR	0
MCS	0.001		0	NR	NR	NR	NR	0
SPILLS 90	0.001		0	NR	NR	NR	NR	0
Other Ascertainable Records								
RCRA NonGen / NLR	0.250		9	5	NR	NR	NR	14
FUDS	1.000		0	0	0	0	NR	0
DOD	1.000		0	0	0	0	NR	0
SCRD DRYCLEANERS	0.500		0	0	0	NR	NR	0
US FIN ASSUR	0.001		0	NR	NR	NR	NR	0
EPA WATCH LIST	0.001		0	NR	NR	NR	NR	0
2020 COR ACTION	0.250		0	0	NR	NR	NR	0
TSCA	0.001		0	NR	NR	NR	NR	0
TRIS	0.001		0	NR	NR	NR	NR	0
SSTS	0.001		0	NR	NR	NR	NR	0
ROD	1.000		0	0	0	0	NR	0
RMP	0.001		0	NR	NR	NR	NR	0
RAATS	0.001		0	NR	NR	NR	NR	0
PRP	0.001		0	NR	NR	NR	NR	0
PADS	0.001		0	NR	NR	NR	NR	0
ICIS	0.001		0	NR	NR	NR	NR	0
FTTS	0.001		0	NR	NR	NR	NR	0
MLTS	0.001		0	NR	NR	NR	NR	0
COAL ASH DOE	0.001		0	NR	NR	NR	NR	0
COAL ASH EPA	0.500		0	0	0	NR	NR	0
PCB TRANSFORMER	0.001		0	NR	NR	NR	NR	0
RADINFO	0.001		0	NR	NR	NR	NR	0
HIST FTTS	0.001		0	NR	NR	NR	NR	0
DOT OPS	0.001		0	NR	NR	NR	NR	0
CONSENT	1.000		0	0	0	0	NR	0
INDIAN RESERV	1.000		0	0	0	0	NR	0
FUSRAP	1.000		0	0	0	0	NR	0
UMTRA	0.500		0	0	0	NR	NR	0
LEAD SMELTERS	0.001		0	NR	NR	NR	NR	0
US AIRS	0.001		0	NR	NR	NR	NR	0
US MINES	0.250		0	0	NR	NR	NR	0
ABANDONED MINES	0.250		0	0	NR	NR	NR	0
FINDS	0.001		0	NR	NR	NR	NR	0
ECHO	0.001		0	NR	NR	NR	NR	0
DOCKET HWC	0.001		0	NR	NR	NR	NR	0
UXO	1.000		0	0	0	0	NR	0
FUELS PROGRAM	0.250		0	0	NR	NR	NR	0
PFAS NPL	0.250		0	0	NR	NR	NR	0
PFAS FEDERAL SITES	0.250		0	0	NR	NR	NR	0
PFAS TSCA	0.250		0	0	NR	NR	NR	0

MAP FINDINGS SUMMARY

Database	Search Distance (Miles)	Target Property	< 1/8	1/8 - 1/4	1/4 - 1/2	1/2 - 1	> 1	Total Plotted
PFAS RCRA MANIFEST	0.250		0	0	NR	NR	NR	0
PFAS ATSDR	0.250		0	0	NR	NR	NR	0
PFAS WQP	0.250		0	0	NR	NR	NR	0
PFAS NPDES	0.250		0	0	NR	NR	NR	0
PFAS ECHO	0.250		0	0	NR	NR	NR	0
PFAS ECHO FIRE TRAINING	0.250		0	0	NR	NR	NR	0
PFAS PART 139 AIRPORT	0.250		0	0	NR	NR	NR	0
AQUEOUS FOAM NRC	0.250		0	0	NR	NR	NR	0
PFAS	0.250		0	0	NR	NR	NR	0
AQUEOUS FOAM	TP		NR	NR	NR	NR	NR	0
CA BOND EXP. PLAN	1.000		0	0	0	0	NR	0
Cortese	0.500		0	0	2	NR	NR	2
CUPA Listings	0.250		0	0	NR	NR	NR	0
DRYCLEANERS	0.250		0	2	NR	NR	NR	2
EMI	0.001		0	NR	NR	NR	NR	0
ENF	0.001		0	NR	NR	NR	NR	0
Financial Assurance	0.001		0	NR	NR	NR	NR	0
ICE	0.001		0	NR	NR	NR	NR	0
HIST CORTESE	0.500		0	0	1	NR	NR	1
HWP	1.000		0	0	0	1	NR	1
HWT	0.250		0	0	NR	NR	NR	0
HAZNET	0.001	1	0	NR	NR	NR	NR	1
MINES	0.250		0	0	NR	NR	NR	0
MWMP	0.250		0	0	NR	NR	NR	0
NPDES	0.001		0	NR	NR	NR	NR	0
PEST LIC	0.001		0	NR	NR	NR	NR	0
PROC	0.500		0	0	0	NR	NR	0
Notify 65	1.000		0	0	0	1	NR	1
UIC	0.001		0	NR	NR	NR	NR	0
UIC GEO	0.001		0	NR	NR	NR	NR	0
WASTEWATER PITS	0.500		0	0	0	NR	NR	0
WDS	0.001		0	NR	NR	NR	NR	0
WIP	0.250		0	0	NR	NR	NR	0
MILITARY PRIV SITES	0.001		0	NR	NR	NR	NR	0
PROJECT	0.001		0	NR	NR	NR	NR	0
WDR	0.001		0	NR	NR	NR	NR	0
CIWQS	0.001		0	NR	NR	NR	NR	0
CERS	0.001		0	NR	NR	NR	NR	0
NON-CASE INFO	0.001		0	NR	NR	NR	NR	0
OTHER OIL GAS	0.001		0	NR	NR	NR	NR	0
PROD WATER PONDS	0.001		0	NR	NR	NR	NR	0
SAMPLING POINT	0.001		0	NR	NR	NR	NR	0
WELL STIM PROJ	0.001		0	NR	NR	NR	NR	0
MINES MRDS	0.001		0	NR	NR	NR	NR	0
HWTS	TP	1	NR	NR	NR	NR	NR	1

EDR HIGH RISK HISTORICAL RECORDS

EDR Exclusive Records

EDR MGP	1.000		0	0	0	0	NR	0

MAP FINDINGS SUMMARY

Database	Search Distance (Miles)	Target Property	< 1/8	1/8 - 1/4	1/4 - 1/2	1/2 - 1	> 1	Total Plotted
EDR Hist Auto	0.125		0	NR	NR	NR	NR	0
EDR Hist Cleaner	0.125		0	NR	NR	NR	NR	0
EDR RECOVERED GOVERNMENT ARCHIVES								
Exclusive Recovered Govt. Archives								
RGA LF	0.001		0	NR	NR	NR	NR	0
RGA LUST	0.001		0	NR	NR	NR	NR	0
- Totals --		3	21	15	6	3	0	48

NOTES:

TP = Target Property

NR = Not Requested at this Search Distance

Sites may be listed in more than one database

A1 **ERNS** **2009926008**
Target Property **825 DRAKE AVE**
SAUSALIDO, CA **N/A**

Site 1 of 8 in cluster A

Actual: 56 ft.

Incident Commons:

NRC Report #:	926008
Description of Incident:	CALLER REPORTED A TRANSFORMER FELL OFF OF A POLE AND MATERIALS WENT INTO A STORM DRAIN.
Type of Incident:	FIXED
Incident Cause:	OTHER
Incident Date Time:	2009-12-12 15:30:00
Incident DTG:	OCCURRED
Incident Location:	Not reported
Loaction Address:	825 DRAKE AVE
Location Street 1:	Not reported
Location Street 2:	Not reported
Location Nearest City:	SAUSALIDO
Location State:	CA
Location County:	MARIN
Location Zip:	Not reported
Distance From City:	Not reported
Distance Units:	Not reported
Direction From City:	Not reported
Lat Deg:	Not reported
Lat Min:	Not reported
Lat Sec:	Not reported
Lat Quad:	Not reported
Long Deg:	Not reported
Long Min:	Not reported
Long Sec:	Not reported
Long Quad:	Not reported
Location Section:	Not reported
Location Township:	Not reported
Location range:	Not reported
Potential Range:	N

Incidents:

Year:	2009
NRC Report #:	926008
Aircraft Type:	Not reported
Aircraft Model:	Not reported
Aircraft ID:	Not reported
Aircraft Fuel Capacity:	Not reported
Aircraft Fuel Capacity Units:	Not reported
Aircraft Fuel on Board:	Not reported
Aircraft Fuel on Board Units:	Not reported
Aircraft Spot Number:	Not reported
Aircraft Hanger:	Not reported
Aircraft Runway Number:	Not reported
Road Mile Marker:	Not reported
Building ID:	Not reported
Type of Fixed Object:	TRANSFORMER
Power Generating Facility:	U
Generating Capacity:	Not reported
Type of Fuel:	Not reported
NPDES:	Not reported
NPDES Compliance:	U
Pipeline Type:	Not reported

(Continued) **2009926008**

DOT Regulated:	U
Pipeline Above Ground:	ABOVE
Exposed Underwater:	N
Pipeline Covered:	U
Railroad Hotline:	Not reported
Grade Crossing:	U
Location Subdivision:	Not reported
Railroad Milepost:	Not reported
Type Vehicle Involved:	Not reported
Crossing Device Type:	Not reported
Device Operational:	U
DOT Crossing Number:	Not reported
Brake Failure:	U
Description of Tank:	Not reported
Tank Above Ground:	ABOVE
Transportable Container:	U
Tank Regulated:	U
Tank Regulated By:	Not reported
Tank ID:	Not reported
Capacity of Tank:	Not reported
Capacity of Tank Units:	Not reported
Actual Amount:	Not reported
Actual Amount Units:	Not reported
Platform Rig Name:	Not reported
Platform Letter:	Not reported
Location Area ID:	Not reported
Location Block ID:	Not reported
OCSG Number:	Not reported
OCSP Number:	Not reported
State Lease Number:	Not reported
Pier Dock Number:	Not reported
Berth Slip Number:	Not reported
Continuous Release Type:	Not reported
Initial Continuous Release No:	Not reported
Continuous Release Permit:	Not reported
Allision:	U
Type of Structure:	Not reported
Structure Name:	Not reported
Structure Operational:	U
Airbag Deployed:	U
Date Tiem Normal Service:	Not reported
Service Disruption Time:	Not reported
Service Disruption Units:	Not reported
Transit Bus Flag:	Not reported
CR Begin Date:	Not reported
CR End Date:	Not reported
CR Change Date:	Not reported
FBI Contact:	Not reported
FBI Contact Date Time:	Not reported
Sub Part C Testing Req:	XXX
Conductor Testing:	Not reported
Engineer Testing:	Not reported
Trainman Testing:	Not reported
Yard Foreman Testing:	Not reported
RCL Operator Testing:	Not reported
Brakeman Testing:	Not reported
Train Dispatcher Testing:	Not reported

(Continued) **2009926008**

Signalman Testing:	Not reported
Other Employee Testing:	Not reported
Unknown Testing:	Not reported
Passenger Handling:	Not reported
Passenger Route:	XXX
Passenger Delay:	XXX

Incident Details:

Year:	2009
NRC Report #:	926008
Fire Involved:	N
Fire Extinguished:	U
Any Evacuations:	N
Number Evacuated:	Not reported
Who Evacuated:	Not reported
Radius of Evacuation:	Not reported
Any Injuries:	N
Number Injured:	Not reported
Number Hospitalized:	Not reported
Any Fatalities:	N
Number Fatalities:	Not reported
Any Damages:	N
Damage Amount:	Not reported
Air Corridor Closed:	N
Air Corridor Desc:	Not reported
Air Closure Time:	Not reported
Waterway Closed:	N
Waterway Desc:	Not reported
Waterway Closure Time:	Not reported
Road Closed:	N
Road Desc:	Not reported
Road Closure Time:	Not reported
Closure Direction:	Not reported
Major Artery:	N
Track Closed:	N
Track Desc:	Not reported
Track Closure Time:	Not reported
Media Interest:	NONE
Medium Desc:	WATER
Additional Medium Info:	STORM DRAIN WITHOUT CATCH BASIN
Body of Water:	SAN FRANCSICO BAY
Tributary of:	Not reported
Release Secured:	Y
Estimated Duration of Release:	Not reported
Release rate:	Not reported
Desc Remedial Action:	INVESTIGATION UNDERWAY
State Agency on Scene:	NONE
State Agency Report Number:	09-8292
Other Agency Notified:	Not reported
Weather Conditions:	RAINY
Air Temperature:	Not reported
Wind Speed:	Not reported
Wind Direction:	Not reported
Water Supply Contaminated:	U
Sheen Size:	Not reported
Sheen Color:	Not reported
Direction of Sheen Travel:	Not reported

(Continued) **2009926008**

Sheen Odor Description:	Not reported
Wave Condition:	Not reported
Current Speed:	Not reported
Current Direction:	Not reported
Water Temperature:	Not reported
Track Close Dir:	Not reported
Empl Fatality:	Not reported
Pass Fatality:	Not reported
Community Impact:	Not reported
Wind Speed Unit:	Not reported
Employee Injuries:	Not reported
Passenger Injuries:	Not reported
Occupant Fatality:	Not reported
Current Speed Unit:	Not reported
Road Closure Units:	Not reported
Track CLosure Units:	Not reported
Sheen Size Units:	Not reported
Additional Info:	NONE
State Agency Notified:	NONE
Federal Agency Notified:	CAOES
nearest River Mile Marker:	Not reported
Sheen Size Length:	Not reported
Sheen Size Length Units:	Not reported
Sheen Size Width:	Not reported
Sheen Size Width Units:	Not reported
Offshore:	N
Duration Unit:	Not reported
Release Rate Unit:	Not reported
Release Rate Rate:	Not reported
Passengers Transferred:	NO

Calls:

Year:	2009
NRC Report #:	926008
Site ID:	2009926008
Date Time Received:	2009-12-12 19:16:59
Date Time Complete:	2009-12-12 19:20:25
Call Type:	INC
Responsible Company:	PG & E
Responsible Org Type:	PUBLIC UTILITY
Responsible City:	FRESNO
Responsible State:	CA
Responsible Zip:	Not reported
On Behalf:	Y
Source:	TELEPHONE

Material Involved:

Year:	2009
NRC Report #:	926008
Chris Code:	OMN
Case Number:	000000-00-0
UN Number:	Not reported
Amount of Material:	48
Unit of Measure:	GALLON(S)
Name of Material:	OIL, MISC: MINERAL
If Reached Water:	YES

(Continued) **2009926008**

Amount in Water: 48
Unit of Measure Reach Water: GALLON(S)

A2 **THE VILLAGE BAPTIST CHURCH** **HAZNET** **S112915955**
Target **825 DRAKE AVE** **HWTS** **N/A**
Property **MARIN CITY, CA 94965**

Site 2 of 8 in cluster A

Actual:
56 ft.

HAZNET:

Name:	THE VILLAGE BAPTIST CHURCH
Address:	825 DRAKE AVE
Address 2:	Not reported
City,State,Zip:	MARIN CITY, CA 949650000
Contact:	KYLE PICKETT/AM TECH
Telephone:	5102655510
Mailing Name:	Not reported
Mailing Address:	825 DRAKE AVE
Year:	2002
Gepaid:	CAC002365527
TSD EPA ID:	CAD981382732
CA Waste Code:	151 - Asbestos containing waste
Disposal Method:	D80 - Disposal, Land Fill
Tons:	88.494

Additional Info:

Year:	2002
Gen EPA ID:	CAC002365527
Shipment Date:	20020318
Creation Date:	7/22/2002 18:32:38
Receipt Date:	20020318
Manifest ID:	21036649
Trans EPA ID:	CAR000017657
Trans Name:	Not reported
Trans 2 EPA ID:	Not reported
Trans 2 Name:	Not reported
TSDF EPA ID:	CAD981382732
Trans Name:	Not reported
TSDF Alt EPA ID:	Not reported
TSDF Alt Name:	Not reported
Waste Code Description:	151 - Asbestos-containing waste
RCRA Code:	Not reported
Meth Code:	D80 - Disposal, Land Fill
Quantity Tons:	16.856
Waste Quantity:	20
Quantity Unit:	Y
Additional Code 1:	Not reported
Additional Code 2:	Not reported
Additional Code 3:	Not reported
Additional Code 4:	Not reported
Additional Code 5:	Not reported
Shipment Date:	20020318

THE VILLAGE BAPTIST CHURCH (Continued) **S112915955**

Creation Date:	7/22/2002 18:32:38
Receipt Date:	20020318
Manifest ID:	21036650
Trans EPA ID:	CAR000017657
Trans Name:	Not reported
Trans 2 EPA ID:	Not reported
Trans 2 Name:	Not reported
TSDF EPA ID:	CAD981382732
Trans Name:	Not reported
TSDF Alt EPA ID:	Not reported
TSDF Alt Name:	Not reported
Waste Code Description:	151 - Asbestos-containing waste
RCRA Code:	Not reported
Meth Code:	D80 - Disposal, Land Fill
Quantity Tons:	8.428
Waste Quantity:	10
Quantity Unit:	Y
Additional Code 1:	Not reported
Additional Code 2:	Not reported
Additional Code 3:	Not reported
Additional Code 4:	Not reported
Additional Code 5:	Not reported

Shipment Date:	20020311
Creation Date:	7/22/2002 18:32:38
Receipt Date:	20020314
Manifest ID:	21036618
Trans EPA ID:	CAR000017657
Trans Name:	Not reported
Trans 2 EPA ID:	Not reported
Trans 2 Name:	Not reported
TSDF EPA ID:	CAD981382732
Trans Name:	Not reported
TSDF Alt EPA ID:	Not reported
TSDF Alt Name:	Not reported
Waste Code Description:	151 - Asbestos-containing waste
RCRA Code:	Not reported
Meth Code:	D80 - Disposal, Land Fill
Quantity Tons:	29.498
Waste Quantity:	35
Quantity Unit:	Y
Additional Code 1:	Not reported
Additional Code 2:	Not reported
Additional Code 3:	Not reported
Additional Code 4:	Not reported
Additional Code 5:	Not reported

Shipment Date:	20020311
Creation Date:	7/22/2002 18:32:38
Receipt Date:	20020314
Manifest ID:	21036640
Trans EPA ID:	CAR000017657
Trans Name:	Not reported
Trans 2 EPA ID:	Not reported
Trans 2 Name:	Not reported
TSDF EPA ID:	CAD981382732
Trans Name:	Not reported

THE VILLAGE BAPTIST CHURCH (Continued) **S112915955**

TSDF Alt EPA ID: Not reported
TSDF Alt Name: Not reported
Waste Code Description: 151 - Asbestos-containing waste
RCRA Code: Not reported
Meth Code: D80 - Disposal, Land Fill
Quantity Tons: 33.712
Waste Quantity: 40
Quantity Unit: Y
Additional Code 1: Not reported
Additional Code 2: Not reported
Additional Code 3: Not reported
Additional Code 4: Not reported
Additional Code 5: Not reported

HWTS:
Name: THE VILLAGE BAPTIST CHURCH
Address: 825 DRAKE AVE
Address 2: Not reported
City,State,Zip: MARIN CITY, CA 94965
EPA ID: CAC002365527
Inactive Date: 09/10/2002
Create Date: 08/24/2001
Last Act Date: Not reported
Mailing Name: Not reported
Mailing Address: 825 DRAKE AVE
Mailing Address 2: Not reported
Mailing City,State,Zip: MARIN CITY, CA 949650000
Owner Name: THE VILLAGE BAPTIST CHURCH
Owner Address: 825 DRAKE AVE
Owner Address 2: Not reported
Owner City,State,Zip: MARIN CITY, CA 949650000
Contact Name: KYLE PICKETT/AM TECH
Contact Address: 3201 DIABLO AVE
Contact Address 2: Not reported
City,State,Zip: HAYWARD, CA 945450000
Facility Status: Inactive
Facility Type: TEMPORARY
Category: STATE
Latitude: 37.874362
Longitude: -122.513008

A3 **COUNTY OF MARIN/MARIN CITY FIRE** **CERS TANKS** **S121752872**
SE **850 DRAKE AVENUE** **CERS** **N/A**
< 1/8 **MARIN CITY, CA 94965**
0.019 mi.
98 ft. **Site 3 of 8 in cluster A**

Relative:
Lower

Actual:
35 ft.

CERS TANKS:
Name: COUNTY OF MARIN/MARIN CITY FIRE
Address: 850 DRAKE AVENUE
City,State,Zip: MARIN CITY, CA 94965
Site ID: 22078
CERS ID: 10032613
CERS Description: Aboveground Petroleum Storage

CERS:
Name: COUNTY OF MARIN/MARIN CITY FIRE

COUNTY OF MARIN/MARIN CITY FIRE (Continued) **S121752872**

Address: 850 DRAKE AVENUE
City,State,Zip: MARIN CITY, CA 94965
Site ID: 22078
CERS ID: 10032613
CERS Description: Chemical Storage Facilities

Evaluation:
Eval General Type: Compliance Evaluation Inspection
Eval Date: 06-16-2014
Violations Found: No
Eval Type: Routine done by local agency
Eval Notes: Not reported
Eval Division: Marin County Dept of Public Works, Waste Mgmt, CUP
Eval Program: HMRRP
Eval Source: CERS,

Eval General Type: Compliance Evaluation Inspection
Eval Date: 07-10-2017
Violations Found: No
Eval Type: Routine done by local agency
Eval Notes: Not reported
Eval Division: Marin County Dept of Public Works, Waste Mgmt, CUP
Eval Program: HMRRP
Eval Source: CERS,

Eval General Type: Compliance Evaluation Inspection
Eval Date: 06-16-2014
Violations Found: No
Eval Type: Routine done by local agency
Eval Notes: Not reported
Eval Division: Marin County Dept of Public Works, Waste Mgmt, CUP
Eval Program: APSA
Eval Source: CERS,

Eval General Type: Compliance Evaluation Inspection
Eval Date: 07-10-2017
Violations Found: No
Eval Type: Routine done by local agency
Eval Notes: Not reported
Eval Division: Marin County Dept of Public Works, Waste Mgmt, CUP
Eval Program: APSA
Eval Source: CERS,

Eval General Type: Compliance Evaluation Inspection
Eval Date: 12-09-2021
Violations Found: No
Eval Type: Routine done by local agency
Eval Notes: Routine inspection. Patrick McNerney granted access
Eval Division: Marin County Dept of Public Works, Waste Mgmt, CUP
Eval Program: HMRRP
Eval Source: CERS,

Affiliation:
Affiliation Type Desc: Environmental Contact
Entity Name: Patrick McNerney
Entity Title: Not reported
Affiliation Address: P.O. BOX 4186

COUNTY OF MARIN/MARIN CITY FIRE (Continued) **S121752872**

Affiliation City:	San Rafael
Affiliation State:	CA
Affiliation Country:	Not reported
Affiliation Zip:	94903
Affiliation Phone:	,
Affiliation Type Desc:	Property Owner
Entity Name:	County of Marin
Entity Title:	Not reported
Affiliation Address:	P.O. Box 4186
Affiliation City:	San Rafael
Affiliation State:	CA
Affiliation Country:	United States
Affiliation Zip:	94913
Affiliation Phone:	(415) 473-6576,
Affiliation Type Desc:	CUPA District
Entity Name:	Marin County CUPA
Entity Title:	Not reported
Affiliation Address:	1600 Los GamosSuite 210
Affiliation City:	San Rafael
Affiliation State:	CA
Affiliation Country:	Not reported
Affiliation Zip:	94903
Affiliation Phone:	(415) 473-6647,
Affiliation Type Desc:	Facility Mailing Address
Entity Name:	Mailing Address
Entity Title:	Not reported
Affiliation Address:	P.O. Box 4186
Affiliation City:	San Rafael
Affiliation State:	CA
Affiliation Country:	Not reported
Affiliation Zip:	94913
Affiliation Phone:	,
Affiliation Type Desc:	Legal Owner
Entity Name:	County of Marin
Entity Title:	Not reported
Affiliation Address:	P.O. Box 4186
Affiliation City:	San Rafael
Affiliation State:	CA
Affiliation Country:	United States
Affiliation Zip:	94913
Affiliation Phone:	(415) 473-6576,
Affiliation Type Desc:	Operator
Entity Name:	County of Marin
Entity Title:	Not reported
Affiliation Address:	Not reported
Affiliation City:	Not reported
Affiliation State:	Not reported
Affiliation Country:	Not reported
Affiliation Zip:	Not reported
Affiliation Phone:	(415) 473-6577,
Affiliation Type Desc:	Document Preparer

COUNTY OF MARIN/MARIN CITY FIRE (Continued) **S121752872**

Entity Name:	Patrick McNerney
Entity Title:	Not reported
Affiliation Address:	Not reported
Affiliation City:	Not reported
Affiliation State:	Not reported
Affiliation Country:	Not reported
Affiliation Zip:	Not reported
Affiliation Phone:	,
Affiliation Type Desc:	Identification Signer
Entity Name:	Patrick McNerney
Entity Title:	Environmental Compliance Specialist
Affiliation Address:	Not reported
Affiliation City:	Not reported
Affiliation State:	Not reported
Affiliation Country:	Not reported
Affiliation Zip:	Not reported
Affiliation Phone:	,
Affiliation Type Desc:	Parent Corporation
Entity Name:	County of Marin
Entity Title:	Not reported
Affiliation Address:	Not reported
Affiliation City:	Not reported
Affiliation State:	Not reported
Affiliation Country:	Not reported
Affiliation Zip:	Not reported
Affiliation Phone:	,

A4 **MARIN COUNTY FIRE & SHERIFF** **UST** **U003914632**
SE **850 DRAKE AVE.** **N/A**
< 1/8 **MARIN CITY, CA 94965**
0.019 mi.
98 ft. **Site 4 of 8 in cluster A**

Relative: **Lower**

Actual: **35 ft.**

MARIN CO. UST:

Name:	COUNTY OF MARIN/MARIN CITY FIRE
Address:	850 DRAKE AVENUE
City:	MARIN CITY
Zip:	Not reported
Facility Id:	60-0277
Tank Number:	000001
Tank Status:	UST Removal
Tank Contents:	Premium unleaded
Tank Use:	Motor vehicle fueling
Certficate Number:	Not reported
Last Inspected:	Not reported
Program:	Not reported
Location:	Not reported
Pulled Date:	Not reported
Reason:	Not reported
Tank Number:	000001
Tank Status:	UST Removal
Tank Contents:	Premium unleaded

MARIN COUNTY FIRE & SHERIFF (Continued) **U003914632**

Tank Use: Motor vehicle fueling
Certficate Number: Not reported
Last Inspected: Not reported
Program: Not reported
Location: Not reported
Pulled Date: Not reported
Reason: Not reported

Tank Number: Not reported
Tank Status: Not reported
Tank Contents: Not reported
Tank Use: Not reported
Certficate Number: Not reported
Last Inspected: Not reported
Program: UST
Location: Closed Drawer
Pulled Date: Not reported
Reason: Not reported

UST:
Name: MARIN COUNTY - MARIN CITY
Address: 850 DRAKE AVE.
City,State,Zip: MARIN CITY, CA 94965
Facility ID: 600277
Permitting Agency: MARIN COUNTY
CERSID: Not reported
Latitude: 37.875024
Longitude: -122.5116597
Owner type: Not reported
Facility type: Not reported
Num of inuse ust: Not reported
Num of closed ust: Not reported
Num of oos ust: Not reported
Epa region: Not reported
Tribal lands: Not reported
Tank owner name: Not reported
Tank owner mailing address: Not reported
Tank owner mailing city: Not reported
Tank owner mailing zip: Not reported
Tank owner mailing state: Not reported
Tank operator name: Not reported
Tank operator mailing address: Not reported
Tank operator mailing city: Not reported
Tank operator mailing zip: Not reported
Tank operator mailing state: Not reported
Tankidnumber: Not reported
Tank status: Not reported
Tank configuration: Not reported
Tank closure date: Not reported
Tank installation date: Not reported
Tank num of compartments: Not reported
Tank contents: Not reported
Tank capacity gallons: Not reported
Tank type: Not reported
Tank pc construction: Not reported
Tank pwpiping construction: Not reported

MARIN COUNTY FIRE & SHERIFF (Continued) **U003914632**

Tank piping type:	Not reported
Tank piping construction:	Not reported
Tank sacrificial anode:	Not reported
Tank cp impressed current:	Not reported
Tank cp shutoff:	Not reported
Tank alarms:	Not reported
Tank ball float:	Not reported
Tank spill bucket:	Not reported

A5 **COUNTY OF MARIN/MARIN CITY FIRE** **AST** **A100419056**
SE **850 DRAKE AVENUE** **N/A**
< 1/8 **MARIN CITY, CA 94965**
0.019 mi.
98 ft. **Site 5 of 8 in cluster A**

Relative: **Lower**

Actual: **35 ft.**

AST:

Name:	COUNTY OF MARIN/MARIN CITY FIRE
Address:	850 DRAKE AVENUE
City/Zip:	MARIN CITY,94965
Certified Unified Program Agencies:	Not reported
Owner:	County of Marin
Total Gallons:	Not reported
CERSID:	10032613
Facility ID:	21-000-600277
Business Name:	County of Marin
Phone:	415-473-6576
Fax:	415-473-3250
Mailing Address:	PO Box 4186
Mailing Address City:	San Rafael
Mailing Address State:	CA
Mailing Address Zip Code:	94913
Operator Name:	County of Marin
Operator Phone:	415-473-6577
Owner Phone:	415-473-6576
Owner Mail Address:	PO Box 4186
Owner State:	CA
Owner Zip Code:	94913
Owner Country:	United States
Property Owner Name:	Not reported
Property Owner Phone:	Not reported
Property Owner Mailing Address:	Not reported
Property Owner City:	Not reported
Property Owner Stat :	Not reported
Property Owner Zip Code:	Not reported
Property Owner Country:	Not reported
EPAID:	Not reported

A6 **MARIN CITY FIREHOUSE/SHERIFF S** **SWEEPS UST** **S105086102**
SE **850 DRAKE AVE** **N/A**
< 1/8 **MARIN CITY, CA 94965**
0.019 mi.
98 ft. **Site 6 of 8 in cluster A**

Relative: SWEEPS UST:
Lower

Name:	MARIN CITY FIREHOUSE/SHERIFF S
Address:	850 DRAKE AVE
City:	MARIN CITY
Status:	Active
Comp Number:	36889
Number:	4
Board Of Equalization:	44-013876
Referral Date:	02-16-93
Action Date:	02-16-93
Created Date:	12-31-88
Owner Tank Id:	D 1.0 MCF
SWRCB Tank Id:	21-000-036889-000001
Tank Status:	A
Capacity:	1000
Active Date:	07-01-85
Tank Use:	M.V. FUEL
STG:	P
Content:	REG UNLEADED
Number Of Tanks:	1

Actual:
35 ft.

A7 **MARIN CITY FIREHOUSE/SHERIFF S** **HIST UST** **U001600737**
SE **850 DRAKE AVE.** **N/A**
< 1/8 **850 DRAKE AVE., CA 94965**
0.019 mi.
98 ft. **Site 7 of 8 in cluster A**

Relative: HIST UST:
Lower

Name:	MARIN CITY FIREHOUSE/SHERIFF S
Address:	850 DRAKE AVE.
City,State,Zip:	850 DRAKE AVE., CA 94965
File Number:	Not reported
URL:	Not reported
Region:	STATE
Facility ID:	00000036889
Facility Type:	Other
Other Type:	FIRE DEPT.
Contact Name:	FIRE CAPTAIN
Telephone:	4153329120
Owner Name:	COUNTY OF MARIN
Owner Address:	CIVIC CENTER
Owner City,St,Zip:	SAN RAFAEL, CA 94903
Total Tanks:	0001
Tank Num:	001
Container Num:	D 1.0 MCF
Year Installed:	1969
Tank Capacity:	00001000
Tank Used for:	PRODUCT
Type of Fuel:	PREMIUM
Container Construction Thickness:	12
Leak Detection:	Stock Inventor

Actual:
35 ft.

A8 **MARIN CITY FIREHOUSE/SHERIFF S** **HIST UST** **S112976382**
SE **850 DRAKE AVE** **N/A**
< 1/8 **NONE, CA 94965**
0.019 mi.
98 ft. **Site 8 of 8 in cluster A**

Relative: HIST UST:
Lower

Name:	MARIN CITY FIREHOUSE/SHERIFF S
Address:	850 DRAKE AVE
City,State,Zip:	NONE, CA 94965
File Number:	000291BE
URL:	http://geotracker.waterboards.ca.gov/ustpdfs/pdf/000291BE.pdf
Region:	Not reported
Facility ID:	Not reported
Facility Type:	Not reported
Other Type:	Not reported
Contact Name:	Not reported
Telephone:	Not reported
Owner Name:	Not reported
Owner Address:	Not reported
Owner City,St,Zip:	Not reported
Total Tanks:	Not reported
Tank Num:	Not reported
Container Num:	Not reported
Year Installed:	Not reported
Tank Capacity:	Not reported
Tank Used for:	Not reported
Type of Fuel:	Not reported
Container Construction Thickness:	Not reported
Leak Detection:	Not reported

Actual:
35 ft.

Click here for Geo Tracker PDF:

B9 **BETTY PRICE** **RCRA NonGen / NLR** **1026807433**
SSW **710 DRAKE AVENUE** **CAC003119711**
< 1/8 **SAUSALITO, CA 94965**
0.044 mi.
230 ft. **Site 1 of 3 in cluster B**

Relative: RCRA Listings:
Higher

Date Form Received by Agency:		20210514
Handler Name:	BETTY PRICE	
Handler Address:		710 DRAKE AVENUE
Handler City,State,Zip:		SAUSALITO, CA 94965
EPA ID:		CAC003119711
Contact Name:		BETTY PRICE
Contact Address:		710 DRAKE AVENUE
Contact City,State,Zip:		SAUSALITO, CA 94965
Contact Telephone:		415-331-9404
Contact Fax:		Not reported
Contact Email:		NICOLE@ENV-REM.COM
Contact Title:		Not reported
EPA Region:		09
Land Type:		Not reported
Federal Waste Generator Description:		Not a generator, verified
Non-Notifier:		Not reported
Biennial Report Cycle:		Not reported
Accessibility:		Not reported
Active Site Indicator:		Not reported

Actual:
75 ft.

BETTY PRICE (Continued) **1026807433**

State District Owner:		Not reported
State District:		Not reported
Mailing Address:		710 DRAKE AVENUE
Mailing City,State,Zip:		SAUSALITO, CA 94965
Owner Name:	BETTY PRICE	
Owner Type:		Other
Operator Name:	BETTY PRICE	
Operator Type:		Other
Short-Term Generator Activity:		No
Importer Activity:		No
Mixed Waste Generator:		No
Transporter Activity:		No
Transfer Facility Activity:		No
Recycler Activity with Storage:		No
Small Quantity On-Site Burner Exemption:		No
Smelting Melting and Refining Furnace Exemption:		No
Underground Injection Control:		No
Off-Site Waste Receipt:		No
Universal Waste Indicator:		No
Universal Waste Destination Facility:		No
Federal Universal Waste:		No
Active Site Fed-Reg Treatment Storage and Disposal Facility:		Not reported
Active Site Converter Treatment storage and Disposal Facility:		Not reported
Active Site State-Reg Treatment Storage and Disposal Facility:		Not reported
Active Site State-Reg Handler:		---
Federal Facility Indicator:		Not reported
Hazardous Secondary Material Indicator:		N
Sub-Part K Indicator:		Not reported
Commercial TSD Indicator:		No
Treatment Storage and Disposal Type:		Not reported
2018 GPRA Permit Baseline:		Not on the Baseline
2018 GPRA Renewals Baseline:		Not on the Baseline
Permit Renewals Workload Universe:		Not reported
Permit Workload Universe:		Not reported
Permit Progress Universe:		Not reported
Post-Closure Workload Universe:		Not reported
Closure Workload Universe:		Not reported
202 GPRA Corrective Action Baseline:		No
Corrective Action Workload Universe:		No
Subject to Corrective Action Universe:		No
Non-TSDFs Where RCRA CA has Been Imposed Universe:		No
TSDFs Potentially Subject to CA Under 3004 (u)/(v) Universe:		No
TSDFs Only Subject to CA under Discretionary Auth Universe:		No
Corrective Action Priority Ranking:		No NCAPS ranking
Environmental Control Indicator:		No
Institutional Control Indicator:		No
Human Exposure Controls Indicator:		N/A
Groundwater Controls Indicator:		N/A
Operating TSDF Universe:		Not reported
Full Enforcement Universe:		Not reported
Significant Non-Complier Universe:		No
Unaddressed Significant Non-Complier Universe:		No
Addressed Significant Non-Complier Universe:		No
Significant Non-Complier With a Compliance Schedule Universe:		No
Financial Assurance Required:	Not reported	
Handler Date of Last Change:		20210514
Recognized Trader-Importer:		No

BETTY PRICE (Continued) **1026807433**

Recognized Trader-Exporter:	No
Importer of Spent Lead Acid Batteries:	No
Exporter of Spent Lead Acid Batteries:	No
Recycler Activity Without Storage:	No
Manifest Broker:	No
Sub-Part P Indicator:	No

Handler - Owner Operator:

Owner/Operator Indicator:	Owner
Owner/Operator Name: BETTY PRICE	
Legal Status:	Other
Date Became Current:	Not reported
Date Ended Current:	Not reported
Owner/Operator Address:	710 DRAKE AVENUE
Owner/Operator City,State,Zip:	SAUSALITO, CA 94965
Owner/Operator Telephone:	415-331-9404
Owner/Operator Telephone Ext:	Not reported
Owner/Operator Fax:	Not reported
Owner/Operator Email:	Not reported

Owner/Operator Indicator:	Operator
Owner/Operator Name: BETTY PRICE	
Legal Status:	Other
Date Became Current:	Not reported
Date Ended Current:	Not reported
Owner/Operator Address:	710 DRAKE AVENUE
Owner/Operator City,State,Zip:	SAUSALITO, CA 94965
Owner/Operator Telephone:	415-331-9404
Owner/Operator Telephone Ext:	Not reported
Owner/Operator Fax:	Not reported
Owner/Operator Email:	Not reported

Historic Generators:

Receive Date:	20210514
Handler Name: BETTY PRICE	
Federal Waste Generator Description:	Not a generator, verified
State District Owner:	Not reported
Large Quantity Handler of Universal Waste:	No
Recognized Trader Importer:	No
Recognized Trader Exporter:	No
Spent Lead Acid Battery Importer:	No
Spent Lead Acid Battery Exporter:	No
Current Record:	Yes
Non Storage Recycler Activity:	No
Electronic Manifest Broker:	No

List of NAICS Codes and Descriptions:

NAICS Code:	56299
NAICS Description:	ALL OTHER WASTE MANAGEMENT SERVICES

Facility Has Received Notices of Violations:

Violations:	No Violations Found

BETTY PRICE (Continued) **1026807433**

Evaluation Action Summary:
Evaluations: No Evaluations Found

B10 **BETTY PRICE** **RCRA NonGen / NLR** **1026052715**
SSW **710 DRAKE AVE** **CAC003059611**
< 1/8 **SAUSALITO, CA 94965**
0.044 mi.
230 ft. **Site 2 of 3 in cluster B**

Relative:
Higher

Actual:
75 ft.

RCRA Listings:

Date Form Received by Agency:		20200311
Handler Name:	BETTY PRICE	
Handler Address:		710 DRAKE AVE
Handler City,State,Zip:		SAUSALITO, CA 94965
EPA ID:		CAC003059611
Contact Name:		BETTY PRICE
Contact Address:		710 DRAKE AVE
Contact City,State,Zip:		SAUSALITO, CA 94965
Contact Telephone:		408-332-4413
Contact Fax:		Not reported
Contact Email:		SHACARRAHENDERSON@ALLIANCE-ENVIRO.COM
Contact Title:		Not reported
EPA Region:		09
Land Type:		Not reported
Federal Waste Generator Description:		Not a generator, verified
Non-Notifier:		Not reported
Biennial Report Cycle:		Not reported
Accessibility:		Not reported
Active Site Indicator:		Not reported
State District Owner:		Not reported
State District:		Not reported
Mailing Address:		710 DRAKE AVE
Mailing City,State,Zip:		SAUSALITO, CA 94965
Owner Name:	BETTY PRICE	
Owner Type:		Other
Operator Name:	BETTY PRICE	
Operator Type:		Other
Short-Term Generator Activity:		No
Importer Activity:		No
Mixed Waste Generator:		No
Transporter Activity:		No
Transfer Facility Activity:		No
Recycler Activity with Storage:		No
Small Quantity On-Site Burner Exemption:		No
Smelting Melting and Refining Furnace Exemption:		No
Underground Injection Control:		No
Off-Site Waste Receipt:		No
Universal Waste Indicator:		No
Universal Waste Destination Facility:		No
Federal Universal Waste:		No
Active Site Fed-Reg Treatment Storage and Disposal Facility:		Not reported
Active Site Converter Treatment storage and Disposal Facility:		Not reported
Active Site State-Reg Treatment Storage and Disposal Facility:		Not reported
Active Site State-Reg Handler:		---
Federal Facility Indicator:		Not reported
Hazardous Secondary Material Indicator:		N

BETTY PRICE (Continued) **1026052715**

Sub-Part K Indicator:	Not reported
Commercial TSD Indicator:	No
Treatment Storage and Disposal Type:	Not reported
2018 GPRA Permit Baseline:	Not on the Baseline
2018 GPRA Renewals Baseline:	Not on the Baseline
Permit Renewals Workload Universe:	Not reported
Permit Workload Universe:	Not reported
Permit Progress Universe:	Not reported
Post-Closure Workload Universe:	Not reported
Closure Workload Universe:	Not reported
202 GPRA Corrective Action Baseline:	No
Corrective Action Workload Universe:	No
Subject to Corrective Action Universe:	No
Non-TSDFs Where RCRA CA has Been Imposed Universe:	No
TSDFs Potentially Subject to CA Under 3004 (u)/(v) Universe:	No
TSDFs Only Subject to CA under Discretionary Auth Universe:	No
Corrective Action Priority Ranking:	No NCAPS ranking
Environmental Control Indicator:	No
Institutional Control Indicator:	No
Human Exposure Controls Indicator:	N/A
Groundwater Controls Indicator:	N/A
Operating TSDF Universe:	Not reported
Full Enforcement Universe:	Not reported
Significant Non-Complier Universe:	No
Unaddressed Significant Non-Complier Universe:	No
Addressed Significant Non-Complier Universe:	No
Significant Non-Complier With a Compliance Schedule Universe:	No
Financial Assurance Required: Not reported	
Handler Date of Last Change:	20200313
Recognized Trader-Importer:	No
Recognized Trader-Exporter:	No
Importer of Spent Lead Acid Batteries:	No
Exporter of Spent Lead Acid Batteries:	No
Recycler Activity Without Storage:	No
Manifest Broker:	No
Sub-Part P Indicator:	No

Handler - Owner Operator:

Owner/Operator Indicator:	Owner
Owner/Operator Name: BETTY PRICE	
Legal Status:	Other
Date Became Current:	Not reported
Date Ended Current:	Not reported
Owner/Operator Address:	710 DRAKE AVE
Owner/Operator City,State,Zip:	SAUSALITO, CA 94965
Owner/Operator Telephone:	408-332-4413
Owner/Operator Telephone Ext:	Not reported
Owner/Operator Fax:	Not reported
Owner/Operator Email:	Not reported

Owner/Operator Indicator:	Operator
Owner/Operator Name: BETTY PRICE	
Legal Status:	Other
Date Became Current:	Not reported
Date Ended Current:	Not reported
Owner/Operator Address:	710 DRAKE AVE

BETTY PRICE (Continued) **1026052715**

Owner/Operator City,State,Zip: SAUSALITO, CA 94965
Owner/Operator Telephone: 408-332-4413
Owner/Operator Telephone Ext: Not reported
Owner/Operator Fax: Not reported
Owner/Operator Email: Not reported

Historic Generators:
Receive Date: 20200311
Handler Name: BETTY PRICE
Federal Waste Generator Description: Not a generator, verified
State District Owner: Not reported
Large Quantity Handler of Universal Waste: No
Recognized Trader Importer: No
Recognized Trader Exporter: No
Spent Lead Acid Battery Importer: No
Spent Lead Acid Battery Exporter: No
Current Record: Yes
Non Storage Recycler Activity: Not reported
Electronic Manifest Broker: Not reported

List of NAICS Codes and Descriptions:
NAICS Code: 56299
NAICS Description: ALL OTHER WASTE MANAGEMENT SERVICES

Facility Has Received Notices of Violations:
Violations: No Violations Found

Evaluation Action Summary:
Evaluations: No Evaluations Found

B11 **MARILYN HUTCHESON** **RCRA NonGen / NLR** **1026714296**
SSW **708 DRAKE AVENUE** **CAC003102650**
< 1/8 **SAUSALITO, CA 94965**
0.045 mi.
237 ft. **Site 3 of 3 in cluster B**

Relative:
Higher

Actual:
75 ft.

RCRA Listings:
Date Form Received by Agency: 20210126
Handler Name: MARILYN HUTCHESON
Handler Address: 708 DRAKE AVENUE
Handler City,State,Zip: SAUSALITO, CA 94965
EPA ID: CAC003102650
Contact Name: MARILYN HUTCHESON
Contact Address: 708 DRAKE AVENUE
Contact City,State,Zip: SAUSALITO, CA 94965
Contact Telephone: 707-548-0646
Contact Fax: Not reported
Contact Email: MARIAE@PWSEI.COM
Contact Title: Not reported
EPA Region: 09
Land Type: Not reported
Federal Waste Generator Description: Not a generator, verified
Non-Notifier: Not reported
Biennial Report Cycle: Not reported
Accessibility: Not reported

MARILYN HUTCHESON (Continued) **1026714296**

Active Site Indicator:		Not reported
State District Owner:		Not reported
State District:		Not reported
Mailing Address:		708 DRAKE AVENUE
Mailing City,State,Zip:		SAUSALITO, CA 94965
Owner Name:	MARILYN HUTCHESON	
Owner Type:		Other
Operator Name:	MARILYN HUTCHESON	
Operator Type:		Other
Short-Term Generator Activity:		No
Importer Activity:		No
Mixed Waste Generator:		No
Transporter Activity:		No
Transfer Facility Activity:		No
Recycler Activity with Storage:		No
Small Quantity On-Site Burner Exemption:		No
Smelting Melting and Refining Furnace Exemption:		No
Underground Injection Control:		No
Off-Site Waste Receipt:		No
Universal Waste Indicator:		No
Universal Waste Destination Facility:		No
Federal Universal Waste:		No
Active Site Fed-Reg Treatment Storage and Disposal Facility:		Not reported
Active Site Converter Treatment storage and Disposal Facility:		Not reported
Active Site State-Reg Treatment Storage and Disposal Facility:		Not reported
Active Site State-Reg Handler:		---
Federal Facility Indicator:		Not reported
Hazardous Secondary Material Indicator:		N
Sub-Part K Indicator:		Not reported
Commercial TSD Indicator:		No
Treatment Storage and Disposal Type:		Not reported
2018 GPRA Permit Baseline:		Not on the Baseline
2018 GPRA Renewals Baseline:		Not on the Baseline
Permit Renewals Workload Universe:		Not reported
Permit Workload Universe:		Not reported
Permit Progress Universe:		Not reported
Post-Closure Workload Universe:		Not reported
Closure Workload Universe:		Not reported
202 GPRA Corrective Action Baseline:		No
Corrective Action Workload Universe:		No
Subject to Corrective Action Universe:		No
Non-TSDFs Where RCRA CA has Been Imposed Universe:		No
TSDFs Potentially Subject to CA Under 3004 (u)/(v) Universe:		No
TSDFs Only Subject to CA under Discretionary Auth Universe:		No
Corrective Action Priority Ranking:		No NCAPS ranking
Environmental Control Indicator:		No
Institutional Control Indicator:		No
Human Exposure Controls Indicator:		N/A
Groundwater Controls Indicator:		N/A
Operating TSDF Universe:		Not reported
Full Enforcement Universe:		Not reported
Significant Non-Complier Universe:		No
Unaddressed Significant Non-Complier Universe:		No
Addressed Significant Non-Complier Universe:		No
Significant Non-Complier With a Compliance Schedule Universe:		No
Financial Assurance Required:	Not reported	
Handler Date of Last Change:		20210226

MARILYN HUTCHESON (Continued) **1026714296**

Recognized Trader-Importer:	No
Recognized Trader-Exporter:	No
Importer of Spent Lead Acid Batteries:	No
Exporter of Spent Lead Acid Batteries:	No
Recycler Activity Without Storage:	No
Manifest Broker:	No
Sub-Part P Indicator:	No

Handler - Owner Operator:

Owner/Operator Indicator:	Owner
Owner/Operator Name: MARILYN HUTCHESON	
Legal Status:	Other
Date Became Current:	Not reported
Date Ended Current:	Not reported
Owner/Operator Address:	708 DRAKE AVENUE
Owner/Operator City,State,Zip:	SAUSALITO, CA 94965
Owner/Operator Telephone:	707-548-0646
Owner/Operator Telephone Ext:	Not reported
Owner/Operator Fax:	Not reported
Owner/Operator Email:	Not reported

Owner/Operator Indicator:	Operator
Owner/Operator Name: MARILYN HUTCHESON	
Legal Status:	Other
Date Became Current:	Not reported
Date Ended Current:	Not reported
Owner/Operator Address:	708 DRAKE AVENUE
Owner/Operator City,State,Zip:	SAUSALITO, CA 94965
Owner/Operator Telephone:	707-548-0646
Owner/Operator Telephone Ext:	Not reported
Owner/Operator Fax:	Not reported
Owner/Operator Email:	Not reported

Historic Generators:

Receive Date:	20210126
Handler Name: MARILYN HUTCHESON	
Federal Waste Generator Description:	Not a generator, verified
State District Owner:	Not reported
Large Quantity Handler of Universal Waste:	No
Recognized Trader Importer:	No
Recognized Trader Exporter:	No
Spent Lead Acid Battery Importer:	No
Spent Lead Acid Battery Exporter:	No
Current Record:	Yes
Non Storage Recycler Activity:	No
Electronic Manifest Broker:	No

List of NAICS Codes and Descriptions:

NAICS Code:	56299
NAICS Description:	ALL OTHER WASTE MANAGEMENT SERVICES

Facility Has Received Notices of Violations:

Violations:	No Violations Found

MARILYN HUTCHESON (Continued) **1026714296**

Evaluation Action Summary:
Evaluations: No Evaluations Found

C12 **SCOTT SHAPIRO** **RCRA NonGen / NLR** **1025851107**
SW **127 BUCKELEW ST** **CAC003031220**
< 1/8 **SAUSALITO, CA 94965**
0.098 mi.
516 ft. **Site 1 of 3 in cluster C**

Relative: **Lower**
Actual: **45 ft.**

RCRA Listings:

Date Form Received by Agency:		20190827
Handler Name:	SCOTT SHAPIRO	
Handler Address:		127 BUCKELEW ST
Handler City,State,Zip:		SAUSALITO, CA 94965-1162
EPA ID:		CAC003031220
Contact Name:		SCOTT SHAPIRO
Contact Address:		127 BUCKELEW ST
Contact City,State,Zip:		SAUSALITO, CA 94965-1162
Contact Telephone:		201-679-9177
Contact Fax:		Not reported
Contact Email:		MARIAE@PWSEI.COM
Contact Title:		Not reported
EPA Region:		09
Land Type:		Not reported
Federal Waste Generator Description:		Not a generator, verified
Non-Notifier:		Not reported
Biennial Report Cycle:		Not reported
Accessibility:		Not reported
Active Site Indicator:		Not reported
State District Owner:		Not reported
State District:		Not reported
Mailing Address:		127 BUCKELEW ST
Mailing City,State,Zip:		SAUSALITO, CA 94965-1162
Owner Name:	SCOTT SHAPIRO	
Owner Type:		Other
Operator Name:	SCOTT SHAPIRO	
Operator Type:		Other
Short-Term Generator Activity:		No
Importer Activity:		No
Mixed Waste Generator:		No
Transporter Activity:		No
Transfer Facility Activity:		No
Recycler Activity with Storage:		No
Small Quantity On-Site Burner Exemption:		No
Smelting Melting and Refining Furnace Exemption:		No
Underground Injection Control:		No
Off-Site Waste Receipt:		No
Universal Waste Indicator:		No
Universal Waste Destination Facility:		No
Federal Universal Waste:		No
Active Site Fed-Reg Treatment Storage and Disposal Facility:		Not reported
Active Site Converter Treatment storage and Disposal Facility:		Not reported
Active Site State-Reg Treatment Storage and Disposal Facility:		Not reported
Active Site State-Reg Handler:		---
Federal Facility Indicator:		Not reported
Hazardous Secondary Material Indicator:		N

SCOTT SHAPIRO (Continued) **1025851107**

Sub-Part K Indicator:	Not reported
Commercial TSD Indicator:	No
Treatment Storage and Disposal Type:	Not reported
2018 GPRA Permit Baseline:	Not on the Baseline
2018 GPRA Renewals Baseline:	Not on the Baseline
Permit Renewals Workload Universe:	Not reported
Permit Workload Universe:	Not reported
Permit Progress Universe:	Not reported
Post-Closure Workload Universe:	Not reported
Closure Workload Universe:	Not reported
202 GPRA Corrective Action Baseline:	No
Corrective Action Workload Universe:	No
Subject to Corrective Action Universe:	No
Non-TSDFs Where RCRA CA has Been Imposed Universe:	No
TSDFs Potentially Subject to CA Under 3004 (u)/(v) Universe:	No
TSDFs Only Subject to CA under Discretionary Auth Universe:	No
Corrective Action Priority Ranking:	No NCAPS ranking
Environmental Control Indicator:	No
Institutional Control Indicator:	No
Human Exposure Controls Indicator:	N/A
Groundwater Controls Indicator:	N/A
Operating TSDF Universe:	Not reported
Full Enforcement Universe:	Not reported
Significant Non-Complier Universe:	No
Unaddressed Significant Non-Complier Universe:	No
Addressed Significant Non-Complier Universe:	No
Significant Non-Complier With a Compliance Schedule Universe:	No
Financial Assurance Required: Not reported	
Handler Date of Last Change:	20190910
Recognized Trader-Importer:	No
Recognized Trader-Exporter:	No
Importer of Spent Lead Acid Batteries:	No
Exporter of Spent Lead Acid Batteries:	No
Recycler Activity Without Storage:	No
Manifest Broker:	No
Sub-Part P Indicator:	No

Handler - Owner Operator:

Owner/Operator Indicator:	Operator
Owner/Operator Name: SCOTT SHAPIRO	
Legal Status:	Other
Date Became Current:	Not reported
Date Ended Current:	Not reported
Owner/Operator Address:	127 BUCKELEW ST
Owner/Operator City,State,Zip:	SAUSALITO, CA 94965-1162
Owner/Operator Telephone:	201-679-9177
Owner/Operator Telephone Ext:	Not reported
Owner/Operator Fax:	Not reported
Owner/Operator Email:	Not reported

Owner/Operator Indicator:	Owner
Owner/Operator Name: SCOTT SHAPIRO	
Legal Status:	Other
Date Became Current:	Not reported
Date Ended Current:	Not reported
Owner/Operator Address:	127 BUCKELEW ST

SCOTT SHAPIRO (Continued) **1025851107**

Owner/Operator City,State,Zip: SAUSALITO, CA 94965-1162
Owner/Operator Telephone: 201-679-9177
Owner/Operator Telephone Ext: Not reported
Owner/Operator Fax: Not reported
Owner/Operator Email: Not reported

Historic Generators:
Receive Date: 20190827
Handler Name: SCOTT SHAPIRO
Federal Waste Generator Description: Not a generator, verified
State District Owner: Not reported
Large Quantity Handler of Universal Waste: No
Recognized Trader Importer: No
Recognized Trader Exporter: No
Spent Lead Acid Battery Importer: No
Spent Lead Acid Battery Exporter: No
Current Record: Yes
Non Storage Recycler Activity: Not reported
Electronic Manifest Broker: Not reported

List of NAICS Codes and Descriptions:
NAICS Code: 56299
NAICS Description: ALL OTHER WASTE MANAGEMENT SERVICES

Facility Has Received Notices of Violations:
Violations: No Violations Found

Evaluation Action Summary:
Evaluations: No Evaluations Found

C13 **JUDITH C. FOUCHAUX AND DANNY LAYUG** **RCRA NonGen / NLR** **1027446028**
SW **121 BUCKELEW ST** **CAC003183561**
< 1/8 **SAUSALITO, CA 94965**
0.098 mi.
520 ft. **Site 2 of 3 in cluster C**

Relative: **Lower**
Actual: **45 ft.**

RCRA Listings:
Date Form Received by Agency: 20220701
Handler Name: JUDITH C. FOUCHAUX AND DANNY LAYUG
Handler Address: 121 BUCKELEW ST
Handler City,State,Zip: SAUSALITO, CA 94965
EPA ID: CAC003183561
Contact Name: JUDITH C. FOUCHAUX AND DANNY LAYUG
Contact Address: 121 BUCKELEW ST
Contact City,State,Zip: SAUSALITO, CA 94965
Contact Telephone: 415-823-3434
Contact Fax: Not reported
Contact Email: JFOUCHAUX@COMCAST.NET
Contact Title: Not reported
EPA Region: 09
Land Type: Not reported
Federal Waste Generator Description: Not a generator, verified
Non-Notifier: Not reported
Biennial Report Cycle: Not reported
Accessibility: Not reported

JUDITH C. FOUCHAUX AND DANNY LAYUG (Continued) **1027446028**

Active Site Indicator:	Not reported
State District Owner:	Not reported
State District:	Not reported
Mailing Address:	121 BUCKELEW ST
Mailing City,State,Zip:	SAUSALITO, CA 94965
Owner Name:	JUDITH C. FOUCHAUX AND DANNY LAYUG
Owner Type:	Other
Operator Name:	JUDITH C. FOUCHAUX AND DANNY LAYUG
Operator Type:	Other
Short-Term Generator Activity:	No
Importer Activity:	No
Mixed Waste Generator:	No
Transporter Activity:	No
Transfer Facility Activity:	No
Recycler Activity with Storage:	No
Small Quantity On-Site Burner Exemption:	No
Smelting Melting and Refining Furnace Exemption:	No
Underground Injection Control:	No
Off-Site Waste Receipt:	No
Universal Waste Indicator:	No
Universal Waste Destination Facility:	No
Federal Universal Waste:	No
Active Site Fed-Reg Treatment Storage and Disposal Facility:	Not reported
Active Site Converter Treatment storage and Disposal Facility:	Not reported
Active Site State-Reg Treatment Storage and Disposal Facility:	Not reported
Active Site State-Reg Handler:	---
Federal Facility Indicator:	Not reported
Hazardous Secondary Material Indicator:	N
Sub-Part K Indicator:	Not reported
Commercial TSD Indicator:	No
Treatment Storage and Disposal Type:	Not reported
2018 GPRA Permit Baseline:	Not on the Baseline
2018 GPRA Renewals Baseline:	Not on the Baseline
Permit Renewals Workload Universe:	Not reported
Permit Workload Universe:	Not reported
Permit Progress Universe:	Not reported
Post-Closure Workload Universe:	Not reported
Closure Workload Universe:	Not reported
202 GPRA Corrective Action Baseline:	No
Corrective Action Workload Universe:	No
Subject to Corrective Action Universe:	No
Non-TSDFs Where RCRA CA has Been Imposed Universe:	No
TSDFs Potentially Subject to CA Under 3004 (u)/(v) Universe:	No
TSDFs Only Subject to CA under Discretionary Auth Universe:	No
Corrective Action Priority Ranking:	No NCAPS ranking
Environmental Control Indicator:	No
Institutional Control Indicator:	No
Human Exposure Controls Indicator:	N/A
Groundwater Controls Indicator:	N/A
Operating TSDF Universe:	Not reported
Full Enforcement Universe:	Not reported
Significant Non-Complier Universe:	No
Unaddressed Significant Non-Complier Universe:	No
Addressed Significant Non-Complier Universe:	No
Significant Non-Complier With a Compliance Schedule Universe:	No
Financial Assurance Required:	Not reported
Handler Date of Last Change:	20220704

JUDITH C. FOUCHAUX AND DANNY LAYUG (Continued) **1027446028**

Recognized Trader-Importer:	No
Recognized Trader-Exporter:	No
Importer of Spent Lead Acid Batteries:	No
Exporter of Spent Lead Acid Batteries:	No
Recycler Activity Without Storage:	No
Manifest Broker:	No
Sub-Part P Indicator:	No

Handler - Owner Operator:

Owner/Operator Indicator:	Owner
Owner/Operator Name:	JUDITH C. FOUCHAUX AND DANNY LAYUG
Legal Status:	Other
Date Became Current:	Not reported
Date Ended Current:	Not reported
Owner/Operator Address:	121 BUCKELEW ST
Owner/Operator City,State,Zip:	SAUSALITO, CA 94965
Owner/Operator Telephone:	415-823-3434
Owner/Operator Telephone Ext:	Not reported
Owner/Operator Fax:	Not reported
Owner/Operator Email:	Not reported

Owner/Operator Indicator:	Operator
Owner/Operator Name:	JUDITH C. FOUCHAUX AND DANNY LAYUG
Legal Status:	Other
Date Became Current:	Not reported
Date Ended Current:	Not reported
Owner/Operator Address:	121 BUCKELEW ST
Owner/Operator City,State,Zip:	SAUSALITO, CA 94965
Owner/Operator Telephone:	415-823-3434
Owner/Operator Telephone Ext:	Not reported
Owner/Operator Fax:	Not reported
Owner/Operator Email:	Not reported

Historic Generators:

Receive Date:	20220701
Handler Name:	JUDITH C. FOUCHAUX AND DANNY LAYUG
Federal Waste Generator Description:	Not a generator, verified
State District Owner:	Not reported
Large Quantity Handler of Universal Waste:	No
Recognized Trader Importer:	No
Recognized Trader Exporter:	No
Spent Lead Acid Battery Importer:	No
Spent Lead Acid Battery Exporter:	No
Current Record:	Yes
Non Storage Recycler Activity:	No
Electronic Manifest Broker:	No

List of NAICS Codes and Descriptions:

NAICS Code:	56299
NAICS Description:	ALL OTHER WASTE MANAGEMENT SERVICES

Facility Has Received Notices of Violations:

Violations:	No Violations Found

JUDITH C. FOUCHAUX AND DANNY LAYUG (Continued) **1027446028**

Evaluation Action Summary:
Evaluations: No Evaluations Found

D14 **WEST MARINE #1299** **CERS HAZ WASTE** **S118937850**
ESE **192 DONAHUE ST** **HAZNET** **N/A**
< 1/8 **SAUSALITO, CA 94965** **HWTS**
0.103 mi.
546 ft. **Site 1 of 6 in cluster D**

Relative:
Lower

Actual:
29 ft.

CERS HAZ WASTE:
Name: WEST MARINE #1299
Address: 192 DONAHUE ST
City,State,Zip: SAUSALITO, CA 94965
Site ID: 275109
CERS ID: 10629043
CERS Description: Hazardous Waste Generator

Violations:
Site ID: 275109
Site Name: West Marine #1299
Violation Date: 07-18-2018
Citation: 40 CFR 1 262.34(d)(5)(ii) - U.S. Code of Federal Regulations, Title 40, Chapter 1, Section(s) 262.34(d)(5)(ii)
Violation Description: Failure to post the following information next to the telephone: (A) The name and telephone number of the emergency coordinator; (B) Location of fire extinguishers and spill control material, and, if present, fire alarm; and (C) The telephone number of the fire department, unless the facility has a direct alarm.
Violation Notes: Returned to compliance on 07/18/2018. Emergency information is not posted next to the telephone. The first page of Marin CUPA's contingency plan posted during the inspection.
Violation Division: Marin County Dept of Public Works, Waste Mgmt, CUP
Violation Program: HW
Violation Source: CERS,

Site ID: 275109
Site Name: West Marine #1299
Violation Date: 07-18-2018
Citation: HSC 6.5 25160(b)(1)(C) - California Health and Safety Code, Chapter 6.5, Section(s) 25160(b)(1)(C)
Violation Description: Failure to send a legible copy of each hazardous waste manifest to the Department within 30 days of each shipment of hazardous waste.
Violation Notes: Returned to compliance on 07/18/2018. The generator has not sent a legible copy of each Uniform Hazardous Waste Manifest to the DTSC within 30 days of shipment. Manifests were copied and placed in an envelop to DTSC during the inspection. Send these copies and all future copies of hazardous waste manifests to: Department of Toxic Substances Control ATT: DTSC Generator Manifests P.O. Box 400 Sacramento, CA 95812-0400
Violation Division: Marin County Dept of Public Works, Waste Mgmt, CUP
Violation Program: HW
Violation Source: CERS,

Evaluation:
Eval General Type: Compliance Evaluation Inspection
Eval Date: 06-22-2015

WEST MARINE #1299 (Continued) **S118937850**

Violations Found: No
Eval Type: Routine done by local agency
Eval Notes: Not reported
Eval Division: Marin County Dept of Public Works, Waste Mgmt, CUP
Eval Program: HW
Eval Source: CERS,

Eval General Type: Compliance Evaluation Inspection
Eval Date: 07-18-2018
Violations Found: Yes
Eval Type: Routine done by local agency
Eval Notes: Andrew was quick to correct violations onsite.
Eval Division: Marin County Dept of Public Works, Waste Mgmt, CUP
Eval Program: HW
Eval Source: CERS,

Coordinates:
Site ID: 275109
Facility Name: West Marine #1299
Env Int Type Code: HWG
Program ID: 10629043
Coord Name: Not reported
Ref Point Type Desc: Center of a facility or station.,
Latitude: 37.873210
Longitude: -122.511830

Affiliation:
Affiliation Type Desc: Facility Mailing Address
Entity Name: Mailing Address
Entity Title: Not reported
Affiliation Address: 192 Donahue St
Affiliation City: Sausalito
Affiliation State: CA
Affiliation Country: Not reported
Affiliation Zip: 94965
Affiliation Phone: ,

Affiliation Type Desc: Operator
Entity Name: West Marine Products Inc.
Entity Title: Not reported
Affiliation Address: Not reported
Affiliation City: Not reported
Affiliation State: Not reported
Affiliation Country: Not reported
Affiliation Zip: Not reported
Affiliation Phone: (831) 728-2700,

Affiliation Type Desc: Parent Corporation
Entity Name: West Marine Inc.
Entity Title: Not reported
Affiliation Address: Not reported
Affiliation City: Not reported
Affiliation State: Not reported
Affiliation Country: Not reported
Affiliation Zip: Not reported
Affiliation Phone: ,

WEST MARINE #1299 (Continued) **S118937850**

Affiliation Type Desc:	Property Owner
Entity Name:	The Gerrity Group
Entity Title:	Not reported
Affiliation Address:	977 Lomas Santa Fe Drive, Suite A
Affiliation City:	Solana Beach
Affiliation State:	CA
Affiliation Country:	United States
Affiliation Zip:	92075
Affiliation Phone:	(858) 369-7013,

Affiliation Type Desc:	CUPA District
Entity Name:	Marin County CUPA
Entity Title:	Not reported
Affiliation Address:	1600 Los GamosSuite 210
Affiliation City:	San Rafael
Affiliation State:	CA
Affiliation Country:	Not reported
Affiliation Zip:	94903
Affiliation Phone:	(415) 473-6647,

Affiliation Type Desc:	Environmental Contact
Entity Name:	David Goupil
Entity Title:	Not reported
Affiliation Address:	500 Westridge Drive
Affiliation City:	Watsonville
Affiliation State:	CA
Affiliation Country:	Not reported
Affiliation Zip:	95076
Affiliation Phone:	,

Affiliation Type Desc:	Identification Signer
Entity Name:	Erin Deiotte, Agent for West Marine Products Inc.
Entity Title:	Regulatory Compliance Specialist, Verisk 3E
Affiliation Address:	Not reported
Affiliation City:	Not reported
Affiliation State:	Not reported
Affiliation Country:	Not reported
Affiliation Zip:	Not reported
Affiliation Phone:	,

Affiliation Type Desc:	Document Preparer
Entity Name:	Erin Deiotte, Agent for West Marine Products Inc.
Entity Title:	Not reported
Affiliation Address:	Not reported
Affiliation City:	Not reported
Affiliation State:	Not reported
Affiliation Country:	Not reported
Affiliation Zip:	Not reported
Affiliation Phone:	,

Affiliation Type Desc:	Legal Owner
Entity Name:	West Marine Products Inc.
Entity Title:	Not reported
Affiliation Address:	500 Westridge Dr.
Affiliation City:	Watsonville
Affiliation State:	CA
Affiliation Country:	United States

WEST MARINE #1299 (Continued) **S118937850**

Affiliation Zip: 95076
Affiliation Phone: (831) 728-2700,

HAZNET:
Name: WEST MARINE #1299
Address: 192 DONAHUE ST
Address 2: Not reported
City,State,Zip: SAUSALITO, CA 94964
Contact: DAVID GOUPIL
Telephone: 8312368812
Mailing Name: Not reported
Mailing Address: 500 WESTRIDGE DR

Year: 2021
Gepaid: CAL000398601
TSD EPA ID: IDD073114654
CA Waste Code: 181 - Other inorganic solid waste
Disposal Method: H132 - Landfill Or Surface Impoundment That Will Be Closed As Landfill(To Include On-Site Treatment And/Or Stabilization)
Tons: 0.003

Year: 2021
Gepaid: CAL000398601
TSD EPA ID: IDD073114654
CA Waste Code: 141 - Off-specification, aged or surplus inorganics
Disposal Method: H110 -
Tons: 0.001

Year: 2021
Gepaid: CAL000398601
TSD EPA ID: NVT330010000
CA Waste Code: 141 - Off-specification, aged or surplus inorganics
Disposal Method: H039 - Other Recovery Of Reclamation For Reuse Including Acid Regeneration, Organics Recovery Ect
Tons: 0.004

Year: 2021
Gepaid: CAL000398601
TSD EPA ID: NVT330010000
CA Waste Code: 331 - Off-specification, aged or surplus organics
Disposal Method: H141 - Storage, Bulking, And/Or Transfer Off Site--No Treatment/Reovery (H010-H129) Or (H131-H135)
Tons: 0.0145

Year: 2020
Gepaid: CAL000398601
TSD EPA ID: IDD073114654
CA Waste Code: 141 - Off-specification, aged or surplus inorganics
Disposal Method: H110 -
Tons: 0.0025

Year: 2020
Gepaid: CAL000398601
TSD EPA ID: IDD073114654
CA Waste Code: 141 - Off-specification, aged or surplus inorganics
Disposal Method: H132 - Landfill Or Surface Impoundment That Will Be Closed As

WEST MARINE #1299 (Continued) **S118937850**

Landfill(To Include On-Site Treatment And/Or Stabilization)
Tons: 0.0205

Year: 2020
Gepaid: CAL000398601
TSD EPA ID: IDD073114654
CA Waste Code: 792 - Liquids with pH <= 2 with metals
Disposal Method: H141 - Storage, Bulking, And/Or Transfer Off Site--No Treatment/Reovery (H010-H129) Or (H131-H135)
Tons: 0.011

Year: 2020
Gepaid: CAL000398601
TSD EPA ID: IDD073114654
CA Waste Code: 181 - Other inorganic solid waste
Disposal Method: H132 - Landfill Or Surface Impoundment That Will Be Closed As Landfill(To Include On-Site Treatment And/Or Stabilization)
Tons: 0.0695

Year: 2020
Gepaid: CAL000398601
TSD EPA ID: IDD073114654
CA Waste Code: 331 - Off-specification, aged or surplus organics
Disposal Method: H141 - Storage, Bulking, And/Or Transfer Off Site--No Treatment/Reovery (H010-H129) Or (H131-H135)
Tons: 0.0565

Year: 2019
Gepaid: CAL000398601
TSD EPA ID: IDD073114654
CA Waste Code: 181 - Other inorganic solid waste
Disposal Method: H132 - Landfill Or Surface Impoundment That Will Be Closed As Landfill(To Include On-Site Treatment And/Or Stabilization)
Tons: 0.00500

Click this hyperlink while viewing on your computer to access
21 additional CA HAZNET: record(s) in the EDR Site Report.

Detail Two:
Year: 2020
EM Manifest ID: af05c2ba-5def-46d9-9a96-9a413c68f513
Shipment Date: 11/2/2020
Receipt Date: 11/18/2020
Manifest Number: 021911365JJK
Generator EPA ID: CAL000398601
Name: WEST MARINE #1299
Address: 192 DONAHUE ST
Address 2: Not reported
City: SAUSALITO
Zip: 94964
Telephone: 954-993-9538
Contact: Not reported
Contact Telephone: 954-993-9538
Transporter 1 EPA ID: MIK435642742
Transporter 1 Emergency Number: Not reported
Transporter 2 EPA ID: MOD095038998

WEST MARINE #1299 (Continued) **S118937850**

Transporter 2 Emergency Number:	Not reported
TSDF EPA ID:	IDD073114654
TSDF Name:	US ECOLOGY IDAHO INC SITE B
TSDF Address 1:	LEMLEY RD
TSDF Address 2:	Not reported
TSDF City:	GRAND VIEW
TSDF Zip:	83624
TSDF Telephone:	800-839-3975

Federal:

Year:	2020
EM Manifest ID:	af05c2ba-5def-46d9-9a96-9a413c68f513
Generator EPA ID:	CAL000398601
Shipment Date:	2020-11-02
Manifest Number:	021911365JJK
Line Number:	1
Method Code:	H141
Quantity Tons:	0.00100
Quantity Waste:	2.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	Fiberboard or plastic drums, barrels, kegs
Quantity Type:	Pounds
Federal Code:	D001

Year:	2020
EM Manifest ID:	af05c2ba-5def-46d9-9a96-9a413c68f513
Generator EPA ID:	CAL000398601
Shipment Date:	2020-11-02
Manifest Number:	021911365JJK
Line Number:	1
Method Code:	H141
Quantity Tons:	0.00100
Quantity Waste:	2.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	Fiberboard or plastic drums, barrels, kegs
Quantity Type:	Pounds
Federal Code:	D007

Year:	2020
EM Manifest ID:	af05c2ba-5def-46d9-9a96-9a413c68f513
Generator EPA ID:	CAL000398601
Shipment Date:	2020-11-02
Manifest Number:	021911365JJK
Line Number:	1
Method Code:	H141
Quantity Tons:	0.00100
Quantity Waste:	2.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	Fiberboard or plastic drums, barrels, kegs
Quantity Type:	Pounds
Federal Code:	D008

Year:	2020
EM Manifest ID:	af05c2ba-5def-46d9-9a96-9a413c68f513
Generator EPA ID:	CAL000398601

WEST MARINE #1299 (Continued) **S118937850**

Shipment Date:	2020-11-02
Manifest Number:	021911365JJK
Line Number:	1
Method Code:	H141
Quantity Tons:	0.00100
Quantity Waste:	2.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	Fiberboard or plastic drums, barrels, kegs
Quantity Type:	Pounds
Federal Code:	D035

Year:	2020
EM Manifest ID:	af05c2ba-5def-46d9-9a96-9a413c68f513
Generator EPA ID:	CAL000398601
Shipment Date:	2020-11-02
Manifest Number:	021911365JJK
Line Number:	1
Method Code:	H141
Quantity Tons:	0.00100
Quantity Waste:	2.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	Fiberboard or plastic drums, barrels, kegs
Quantity Type:	Pounds
Federal Code:	D039

Year:	2020
EM Manifest ID:	af05c2ba-5def-46d9-9a96-9a413c68f513
Generator EPA ID:	CAL000398601
Shipment Date:	2020-11-02
Manifest Number:	021911365JJK
Line Number:	2
Method Code:	H141
Quantity Tons:	0.05550
Quantity Waste:	111.000000
Quantity Unit:	P
Number of Containers:	4
Type of Container:	Fiberboard or plastic drums, barrels, kegs
Quantity Type:	Pounds
Federal Code:	D001

Year:	2020
EM Manifest ID:	af05c2ba-5def-46d9-9a96-9a413c68f513
Generator EPA ID:	CAL000398601
Shipment Date:	2020-11-02
Manifest Number:	021911365JJK
Line Number:	2
Method Code:	H141
Quantity Tons:	0.05550
Quantity Waste:	111.000000
Quantity Unit:	P
Number of Containers:	4
Type of Container:	Fiberboard or plastic drums, barrels, kegs
Quantity Type:	Pounds
Federal Code:	D004

WEST MARINE #1299 (Continued) **S118937850**

Year:	2020
EM Manifest ID:	af05c2ba-5def-46d9-9a96-9a413c68f513
Generator EPA ID:	CAL000398601
Shipment Date:	2020-11-02
Manifest Number:	021911365JJK
Line Number:	2
Method Code:	H141
Quantity Tons:	0.05550
Quantity Waste:	111.000000
Quantity Unit:	P
Number of Containers:	4
Type of Container:	Fiberboard or plastic drums, barrels, kegs
Quantity Type:	Pounds
Federal Code:	D005

Year:	2020
EM Manifest ID:	af05c2ba-5def-46d9-9a96-9a413c68f513
Generator EPA ID:	CAL000398601
Shipment Date:	2020-11-02
Manifest Number:	021911365JJK
Line Number:	2
Method Code:	H141
Quantity Tons:	0.05550
Quantity Waste:	111.000000
Quantity Unit:	P
Number of Containers:	4
Type of Container:	Fiberboard or plastic drums, barrels, kegs
Quantity Type:	Pounds
Federal Code:	D006

Year:	2020
EM Manifest ID:	af05c2ba-5def-46d9-9a96-9a413c68f513
Generator EPA ID:	CAL000398601
Shipment Date:	2020-11-02
Manifest Number:	021911365JJK
Line Number:	2
Method Code:	H141
Quantity Tons:	0.05550
Quantity Waste:	111.000000
Quantity Unit:	P
Number of Containers:	4
Type of Container:	Fiberboard or plastic drums, barrels, kegs
Quantity Type:	Pounds
Federal Code:	D007

Year:	2020
EM Manifest ID:	af05c2ba-5def-46d9-9a96-9a413c68f513
Generator EPA ID:	CAL000398601
Shipment Date:	2020-11-02
Manifest Number:	021911365JJK
Line Number:	2
Method Code:	H141
Quantity Tons:	0.05550
Quantity Waste:	111.000000
Quantity Unit:	P
Number of Containers:	4
Type of Container:	Fiberboard or plastic drums, barrels, kegs

WEST MARINE #1299 (Continued) **S118937850**

Quantity Type:	Pounds
Federal Code:	D008
Year:	2020
EM Manifest ID:	af05c2ba-5def-46d9-9a96-9a413c68f513
Generator EPA ID:	CAL000398601
Shipment Date:	2020-11-02
Manifest Number:	021911365JJK
Line Number:	2
Method Code:	H141
Quantity Tons:	0.05550
Quantity Waste:	111.000000
Quantity Unit:	P
Number of Containers:	4
Type of Container:	Fiberboard or plastic drums, barrels, kegs
Quantity Type:	Pounds
Federal Code:	D010
Year:	2020
EM Manifest ID:	af05c2ba-5def-46d9-9a96-9a413c68f513
Generator EPA ID:	CAL000398601
Shipment Date:	2020-11-02
Manifest Number:	021911365JJK
Line Number:	2
Method Code:	H141
Quantity Tons:	0.05550
Quantity Waste:	111.000000
Quantity Unit:	P
Number of Containers:	4
Type of Container:	Fiberboard or plastic drums, barrels, kegs
Quantity Type:	Pounds
Federal Code:	D011
Year:	2020
EM Manifest ID:	af05c2ba-5def-46d9-9a96-9a413c68f513
Generator EPA ID:	CAL000398601
Shipment Date:	2020-11-02
Manifest Number:	021911365JJK
Line Number:	2
Method Code:	H141
Quantity Tons:	0.05550
Quantity Waste:	111.000000
Quantity Unit:	P
Number of Containers:	4
Type of Container:	Fiberboard or plastic drums, barrels, kegs
Quantity Type:	Pounds
Federal Code:	D018
Year:	2020
EM Manifest ID:	af05c2ba-5def-46d9-9a96-9a413c68f513
Generator EPA ID:	CAL000398601
Shipment Date:	2020-11-02
Manifest Number:	021911365JJK
Line Number:	2
Method Code:	H141
Quantity Tons:	0.05550
Quantity Waste:	111.000000

WEST MARINE #1299 (Continued) **S118937850**

Quantity Unit:	P
Number of Containers:	4
Type of Container:	Fiberboard or plastic drums, barrels, kegs
Quantity Type:	Pounds
Federal Code:	D027
Year:	2020
EM Manifest ID:	af05c2ba-5def-46d9-9a96-9a413c68f513
Generator EPA ID:	CAL000398601
Shipment Date:	2020-11-02
Manifest Number:	021911365JJK
Line Number:	2
Method Code:	H141
Quantity Tons:	0.05550
Quantity Waste:	111.000000
Quantity Unit:	P
Number of Containers:	4
Type of Container:	Fiberboard or plastic drums, barrels, kegs
Quantity Type:	Pounds
Federal Code:	D035
Year:	2020
EM Manifest ID:	af05c2ba-5def-46d9-9a96-9a413c68f513
Generator EPA ID:	CAL000398601
Shipment Date:	2020-11-02
Manifest Number:	021911365JJK
Line Number:	2
Method Code:	H141
Quantity Tons:	0.05550
Quantity Waste:	111.000000
Quantity Unit:	P
Number of Containers:	4
Type of Container:	Fiberboard or plastic drums, barrels, kegs
Quantity Type:	Pounds
Federal Code:	U002
Year:	2020
EM Manifest ID:	af05c2ba-5def-46d9-9a96-9a413c68f513
Generator EPA ID:	CAL000398601
Shipment Date:	2020-11-02
Manifest Number:	021911365JJK
Line Number:	2
Method Code:	H141
Quantity Tons:	0.05550
Quantity Waste:	111.000000
Quantity Unit:	P
Number of Containers:	4
Type of Container:	Fiberboard or plastic drums, barrels, kegs
Quantity Type:	Pounds
Federal Code:	U154
Year:	2020
EM Manifest ID:	af05c2ba-5def-46d9-9a96-9a413c68f513
Generator EPA ID:	CAL000398601
Shipment Date:	2020-11-02
Manifest Number:	021911365JJK
Line Number:	2

WEST MARINE #1299 (Continued) **S118937850**

Method Code:	H141
Quantity Tons:	0.05550
Quantity Waste:	111.000000
Quantity Unit:	P
Number of Containers:	4
Type of Container:	Fiberboard or plastic drums, barrels, kegs
Quantity Type:	Pounds
Federal Code:	U159
Year:	2020
EM Manifest ID:	af05c2ba-5def-46d9-9a96-9a413c68f513
Generator EPA ID:	CAL000398601
Shipment Date:	2020-11-02
Manifest Number:	021911365JJK
Line Number:	3
Method Code:	H141
Quantity Tons:	0.01100
Quantity Waste:	22.000000
Quantity Unit:	P
Number of Containers:	2
Type of Container:	Fiberboard or plastic drums, barrels, kegs
Quantity Type:	Pounds
Federal Code:	D002
Year:	2020
EM Manifest ID:	af05c2ba-5def-46d9-9a96-9a413c68f513
Generator EPA ID:	CAL000398601
Shipment Date:	2020-11-02
Manifest Number:	021911365JJK
Line Number:	3
Method Code:	H141
Quantity Tons:	0.01100
Quantity Waste:	22.000000
Quantity Unit:	P
Number of Containers:	2
Type of Container:	Fiberboard or plastic drums, barrels, kegs
Quantity Type:	Pounds
Federal Code:	D008
Year:	2020
EM Manifest ID:	af05c2ba-5def-46d9-9a96-9a413c68f513
Generator EPA ID:	CAL000398601
Shipment Date:	2020-11-02
Manifest Number:	021911365JJK
Line Number:	3
Method Code:	H141
Quantity Tons:	0.01100
Quantity Waste:	22.000000
Quantity Unit:	P
Number of Containers:	2
Type of Container:	Fiberboard or plastic drums, barrels, kegs
Quantity Type:	Pounds
Federal Code:	D011
Year:	2020
EM Manifest ID:	af05c2ba-5def-46d9-9a96-9a413c68f513
Generator EPA ID:	CAL000398601

WEST MARINE #1299 (Continued) **S118937850**

Shipment Date:	2020-11-02
Manifest Number:	021911365JJK
Line Number:	6
Method Code:	H110
Quantity Tons:	0.00250
Quantity Waste:	5.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	Fiberboard or plastic drums, barrels, kegs
Quantity Type:	Pounds
Federal Code:	D001

Year:	2020
EM Manifest ID:	af05c2ba-5def-46d9-9a96-9a413c68f513
Generator EPA ID:	CAL000398601
Shipment Date:	2020-11-02
Manifest Number:	021911365JJK
Line Number:	6
Method Code:	H110
Quantity Tons:	0.00250
Quantity Waste:	5.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	Fiberboard or plastic drums, barrels, kegs
Quantity Type:	Pounds
Federal Code:	D003

Year:	2020
EM Manifest ID:	af05c2ba-5def-46d9-9a96-9a413c68f513
Generator EPA ID:	CAL000398601
Shipment Date:	2020-11-02
Manifest Number:	021911365JJK
Line Number:	6
Method Code:	H110
Quantity Tons:	0.00250
Quantity Waste:	5.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	Fiberboard or plastic drums, barrels, kegs
Quantity Type:	Pounds
Federal Code:	D005

State:

Year:	2020
EM Manifest ID:	af05c2ba-5def-46d9-9a96-9a413c68f513
Generator EPA ID:	CAL000398601
Shipment Date:	2020-11-02
Manifest Number:	021911365JJK
Line Number:	1
Method Code:	H141
Quantity Tons:	0.00100
Quantity Waste:	2.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	Fiberboard or plastic drums, barrels, kegs
Quantity Type:	Pounds
State Code:	331

WEST MARINE #1299 (Continued) **S118937850**

Year:	2020
EM Manifest ID:	af05c2ba-5def-46d9-9a96-9a413c68f513
Generator EPA ID:	CAL000398601
Shipment Date:	2020-11-02
Manifest Number:	021911365JJK
Line Number:	2
Method Code:	H141
Quantity Tons:	0.05550
Quantity Waste:	111.000000
Quantity Unit:	P
Number of Containers:	4
Type of Container:	Fiberboard or plastic drums, barrels, kegs
Quantity Type:	Pounds
State Code:	331

Year:	2020
EM Manifest ID:	af05c2ba-5def-46d9-9a96-9a413c68f513
Generator EPA ID:	CAL000398601
Shipment Date:	2020-11-02
Manifest Number:	021911365JJK
Line Number:	3
Method Code:	H141
Quantity Tons:	0.01100
Quantity Waste:	22.000000
Quantity Unit:	P
Number of Containers:	2
Type of Container:	Fiberboard or plastic drums, barrels, kegs
Quantity Type:	Pounds
State Code:	792

Year:	2020
EM Manifest ID:	af05c2ba-5def-46d9-9a96-9a413c68f513
Generator EPA ID:	CAL000398601
Shipment Date:	2020-11-02
Manifest Number:	021911365JJK
Line Number:	4
Method Code:	H132
Quantity Tons:	0.00300
Quantity Waste:	6.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	Fiberboard or plastic drums, barrels, kegs
Quantity Type:	Pounds
State Code:	181

Year:	2020
EM Manifest ID:	af05c2ba-5def-46d9-9a96-9a413c68f513
Generator EPA ID:	CAL000398601
Shipment Date:	2020-11-02
Manifest Number:	021911365JJK
Line Number:	5
Method Code:	H132
Quantity Tons:	0.06650
Quantity Waste:	133.000000
Quantity Unit:	P
Number of Containers:	4
Type of Container:	Fiber or plastic boxes, cartons, cases

WEST MARINE #1299 (Continued) **S118937850**

Quantity Type:	Pounds
State Code:	181
Year:	2020
EM Manifest ID:	af05c2ba-5def-46d9-9a96-9a413c68f513
Generator EPA ID:	CAL000398601
Shipment Date:	2020-11-02
Manifest Number:	021911365JJK
Line Number:	6
Method Code:	H110
Quantity Tons:	0.00250
Quantity Waste:	5.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	Fiberboard or plastic drums, barrels, kegs
Quantity Type:	Pounds
State Code:	141
Year:	2020
EM Manifest ID:	af05c2ba-5def-46d9-9a96-9a413c68f513
Generator EPA ID:	CAL000398601
Shipment Date:	2020-11-02
Manifest Number:	021911365JJK
Line Number:	7
Method Code:	H132
Quantity Tons:	0.02050
Quantity Waste:	41.000000
Quantity Unit:	P
Number of Containers:	3
Type of Container:	Fiberboard or plastic drums, barrels, kegs
Quantity Type:	Pounds
State Code:	141
Year:	2020
EM Manifest ID:	af05c2ba-5def-46d9-9a96-9a413c68f513
Generator EPA ID:	CAL000398601
Shipment Date:	2020-11-02
Manifest Number:	021911365JJK
Line Number:	7
Method Code:	H132
Quantity Tons:	0.02050
Quantity Waste:	41.000000
Quantity Unit:	P
Number of Containers:	3
Type of Container:	Fiberboard or plastic drums, barrels, kegs
Quantity Type:	Pounds
State Code:	331

Detail Two:

Year:	2019
EM Manifest ID:	769171
Shipment Date:	5/13/2019
Receipt Date:	5/21/2019
Manifest Number:	019865655JJK
Generator EPA ID:	CAL000398601
Name:	WEST MARINE #1299

WEST MARINE #1299 (Continued) **S118937850**

Address:	192 DONAHUE ST
Address 2:	Not reported
City:	SAUSALITO
Zip:	94964
Telephone:	954-993-9538
Contact:	Not reported
Contact Telephone:	831-761-4925
Transporter 1 EPA ID:	MIK435642742
Transporter 1 Emergency Number:	Not reported
Transporter 2 EPA ID:	MOD095038998
Transporter 2 Emergency Number:	Not reported
TSDF EPA ID:	OKD000402396
TSDF Name:	US ECOLOGY TULSA, INC
TSDF Address 1:	2700 SOUTH 25TH WEST AVE.
TSDF Address 2:	Not reported
TSDF City:	TULSA
TSDF Zip:	74107
TSDF Telephone:	800-839-3975

Federal:

Year:	2019
EM Manifest ID:	769171
Generator EPA ID:	CAL000398601
Shipment Date:	2019-05-13
Manifest Number:	019865655JJK
Line Number:	1
Method Code:	H141
Quantity Tons:	0.00150
Quantity Waste:	3.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	Fiberboard or plastic drums, barrels, kegs
Quantity Type:	Pounds
Federal Code:	D001

Year:	2019
EM Manifest ID:	769171
Generator EPA ID:	CAL000398601
Shipment Date:	2019-05-13
Manifest Number:	019865655JJK
Line Number:	1
Method Code:	H141
Quantity Tons:	0.00150
Quantity Waste:	3.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	Fiberboard or plastic drums, barrels, kegs
Quantity Type:	Pounds
Federal Code:	D007

Year:	2019
EM Manifest ID:	769171
Generator EPA ID:	CAL000398601
Shipment Date:	2019-05-13
Manifest Number:	019865655JJK
Line Number:	1
Method Code:	H141
Quantity Tons:	0.00150

WEST MARINE #1299 (Continued) **S118937850**

Quantity Waste:	3.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	Fiberboard or plastic drums, barrels, kegs
Quantity Type:	Pounds
Federal Code:	D008
Year:	2019
EM Manifest ID:	769171
Generator EPA ID:	CAL000398601
Shipment Date:	2019-05-13
Manifest Number:	019865655JJK
Line Number:	1
Method Code:	H141
Quantity Tons:	0.00150
Quantity Waste:	3.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	Fiberboard or plastic drums, barrels, kegs
Quantity Type:	Pounds
Federal Code:	D035
Year:	2019
EM Manifest ID:	769171
Generator EPA ID:	CAL000398601
Shipment Date:	2019-05-13
Manifest Number:	019865655JJK
Line Number:	1
Method Code:	H141
Quantity Tons:	0.00150
Quantity Waste:	3.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	Fiberboard or plastic drums, barrels, kegs
Quantity Type:	Pounds
Federal Code:	D039
Year:	2019
EM Manifest ID:	769171
Generator EPA ID:	CAL000398601
Shipment Date:	2019-05-13
Manifest Number:	019865655JJK
Line Number:	2
Method Code:	H141
Quantity Tons:	0.03500
Quantity Waste:	70.000000
Quantity Unit:	P
Number of Containers:	2
Type of Container:	Metal drums, barrels, kegs
Quantity Type:	Pounds
Federal Code:	D001
Year:	2019
EM Manifest ID:	769171
Generator EPA ID:	CAL000398601
Shipment Date:	2019-05-13
Manifest Number:	019865655JJK

WEST MARINE #1299 (Continued) **S118937850**

Line Number:	2
Method Code:	H141
Quantity Tons:	0.03500
Quantity Waste:	70.000000
Quantity Unit:	P
Number of Containers:	2
Type of Container:	Metal drums, barrels, kegs
Quantity Type:	Pounds
Federal Code:	D004
Year:	2019
EM Manifest ID:	769171
Generator EPA ID:	CAL000398601
Shipment Date:	2019-05-13
Manifest Number:	019865655JJK
Line Number:	2
Method Code:	H141
Quantity Tons:	0.03500
Quantity Waste:	70.000000
Quantity Unit:	P
Number of Containers:	2
Type of Container:	Metal drums, barrels, kegs
Quantity Type:	Pounds
Federal Code:	D005
Year:	2019
EM Manifest ID:	769171
Generator EPA ID:	CAL000398601
Shipment Date:	2019-05-13
Manifest Number:	019865655JJK
Line Number:	2
Method Code:	H141
Quantity Tons:	0.03500
Quantity Waste:	70.000000
Quantity Unit:	P
Number of Containers:	2
Type of Container:	Metal drums, barrels, kegs
Quantity Type:	Pounds
Federal Code:	D006
Year:	2019
EM Manifest ID:	769171
Generator EPA ID:	CAL000398601
Shipment Date:	2019-05-13
Manifest Number:	019865655JJK
Line Number:	2
Method Code:	H141
Quantity Tons:	0.03500
Quantity Waste:	70.000000
Quantity Unit:	P
Number of Containers:	2
Type of Container:	Metal drums, barrels, kegs
Quantity Type:	Pounds
Federal Code:	D007
Year:	2019
EM Manifest ID:	769171

WEST MARINE #1299 (Continued) **S118937850**

Generator EPA ID:	CAL000398601
Shipment Date:	2019-05-13
Manifest Number:	019865655JJK
Line Number:	2
Method Code:	H141
Quantity Tons:	0.03500
Quantity Waste:	70.000000
Quantity Unit:	P
Number of Containers:	2
Type of Container:	Metal drums, barrels, kegs
Quantity Type:	Pounds
Federal Code:	D008

Year:	2019
EM Manifest ID:	769171
Generator EPA ID:	CAL000398601
Shipment Date:	2019-05-13
Manifest Number:	019865655JJK
Line Number:	2
Method Code:	H141
Quantity Tons:	0.03500
Quantity Waste:	70.000000
Quantity Unit:	P
Number of Containers:	2
Type of Container:	Metal drums, barrels, kegs
Quantity Type:	Pounds
Federal Code:	D010

Year:	2019
EM Manifest ID:	769171
Generator EPA ID:	CAL000398601
Shipment Date:	2019-05-13
Manifest Number:	019865655JJK
Line Number:	2
Method Code:	H141
Quantity Tons:	0.03500
Quantity Waste:	70.000000
Quantity Unit:	P
Number of Containers:	2
Type of Container:	Metal drums, barrels, kegs
Quantity Type:	Pounds
Federal Code:	D011

Year:	2019
EM Manifest ID:	769171
Generator EPA ID:	CAL000398601
Shipment Date:	2019-05-13
Manifest Number:	019865655JJK
Line Number:	2
Method Code:	H141
Quantity Tons:	0.03500
Quantity Waste:	70.000000
Quantity Unit:	P
Number of Containers:	2
Type of Container:	Metal drums, barrels, kegs
Quantity Type:	Pounds
Federal Code:	D018

WEST MARINE #1299 (Continued) **S118937850**

Year:	2019
EM Manifest ID:	769171
Generator EPA ID:	CAL000398601
Shipment Date:	2019-05-13
Manifest Number:	019865655JJK
Line Number:	2
Method Code:	H141
Quantity Tons:	0.03500
Quantity Waste:	70.000000
Quantity Unit:	P
Number of Containers:	2
Type of Container:	Metal drums, barrels, kegs
Quantity Type:	Pounds
Federal Code:	D027

Year:	2019
EM Manifest ID:	769171
Generator EPA ID:	CAL000398601
Shipment Date:	2019-05-13
Manifest Number:	019865655JJK
Line Number:	2
Method Code:	H141
Quantity Tons:	0.03500
Quantity Waste:	70.000000
Quantity Unit:	P
Number of Containers:	2
Type of Container:	Metal drums, barrels, kegs
Quantity Type:	Pounds
Federal Code:	D035

Year:	2019
EM Manifest ID:	769171
Generator EPA ID:	CAL000398601
Shipment Date:	2019-05-13
Manifest Number:	019865655JJK
Line Number:	2
Method Code:	H141
Quantity Tons:	0.03500
Quantity Waste:	70.000000
Quantity Unit:	P
Number of Containers:	2
Type of Container:	Metal drums, barrels, kegs
Quantity Type:	Pounds
Federal Code:	U002

Year:	2019
EM Manifest ID:	769171
Generator EPA ID:	CAL000398601
Shipment Date:	2019-05-13
Manifest Number:	019865655JJK
Line Number:	2
Method Code:	H141
Quantity Tons:	0.03500
Quantity Waste:	70.000000
Quantity Unit:	P
Number of Containers:	2
Type of Container:	Metal drums, barrels, kegs

WEST MARINE #1299 (Continued) **S118937850**

Quantity Type: Pounds
Federal Code: U154

Year: 2019
EM Manifest ID: 769171
Generator EPA ID: CAL000398601
Shipment Date: 2019-05-13
Manifest Number: 019865655JJK
Line Number: 2
Method Code: H141
Quantity Tons: 0.03500
Quantity Waste: 70.000000
Quantity Unit: P
Number of Containers: 2
Type of Container: Metal drums, barrels, kegs
Quantity Type: Pounds
Federal Code: U159

State:
Year: 2019
EM Manifest ID: 769171
Generator EPA ID: CAL000398601
Shipment Date: 2019-05-13
Manifest Number: 019865655JJK
Line Number: 1
Method Code: H141
Quantity Tons: 0.00150
Quantity Waste: 3.000000
Quantity Unit: P
Number of Containers: 1
Type of Container: Fiberboard or plastic drums, barrels, kegs
Quantity Type: Pounds
State Code: 331

Year: 2019
EM Manifest ID: 769171
Generator EPA ID: CAL000398601
Shipment Date: 2019-05-13
Manifest Number: 019865655JJK
Line Number: 2
Method Code: H141
Quantity Tons: 0.03500
Quantity Waste: 70.000000
Quantity Unit: P
Number of Containers: 2
Type of Container: Metal drums, barrels, kegs
Quantity Type: Pounds
State Code: 331

Year: 2019
EM Manifest ID: 769171
Generator EPA ID: CAL000398601
Shipment Date: 2019-05-13
Manifest Number: 019865655JJK
Line Number: 3
Method Code: H110
Quantity Tons: 0.00050

WEST MARINE #1299 (Continued) **S118937850**

Quantity Waste: 1.000000
Quantity Unit: P
Number of Containers: 1
Type of Container: Cylinders
Quantity Type: Pounds
State Code: 181

Year: 2019
EM Manifest ID: 769171
Generator EPA ID: CAL000398601
Shipment Date: 2019-05-13
Manifest Number: 019865655JJK
Line Number: 4
Method Code: H110
Quantity Tons: 0.03750
Quantity Waste: 75.000000
Quantity Unit: P
Number of Containers: 2
Type of Container: Metal drums, barrels, kegs
Quantity Type: Pounds
State Code: 181

Year: 2019
EM Manifest ID: 737814
Shipment Date: 11/14/2019
Receipt Date: 12/5/2019
Manifest Number: 020592444JJK
Generator EPA ID: CAL000398601
Name: WEST MARINE #1299
Address: 192 DONAHUE ST
Address 2: Not reported
City: SAUSALITO
Zip: 94964
Telephone: 954-993-9538
Contact: Not reported
Contact Telephone: 831-761-4925
Transporter 1 EPA ID: MIK435642742
Transporter 1 Emergency Number: Not reported
Transporter 2 EPA ID: MOD095038998
Transporter 2 Emergency Number: Not reported
TSDF EPA ID: IDD073114654
TSDF Name: US ECOLOGY IDAHO INC SITE B
TSDF Address 1: 20400 LEMLEY RD
TSDF Address 2: Not reported
TSDF City: GRAND VIEW
TSDF Zip: 83624
TSDF Telephone: 800-839-3975

Federal:
Year: 2019
EM Manifest ID: 737814
Generator EPA ID: CAL000398601
Shipment Date: 2019-11-14
Manifest Number: 020592444JJK
Line Number: 1
Method Code: H141
Quantity Tons: 0.00300

WEST MARINE #1299 (Continued) **S118937850**

Quantity Waste:	6.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	Fiberboard or plastic drums, barrels, kegs
Quantity Type:	Pounds
Federal Code:	D001
Year:	2019
EM Manifest ID:	737814
Generator EPA ID:	CAL000398601
Shipment Date:	2019-11-14
Manifest Number:	020592444JJK
Line Number:	1
Method Code:	H141
Quantity Tons:	0.00300
Quantity Waste:	6.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	Fiberboard or plastic drums, barrels, kegs
Quantity Type:	Pounds
Federal Code:	D007
Year:	2019
EM Manifest ID:	737814
Generator EPA ID:	CAL000398601
Shipment Date:	2019-11-14
Manifest Number:	020592444JJK
Line Number:	1
Method Code:	H141
Quantity Tons:	0.00300
Quantity Waste:	6.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	Fiberboard or plastic drums, barrels, kegs
Quantity Type:	Pounds
Federal Code:	D008
Year:	2019
EM Manifest ID:	737814
Generator EPA ID:	CAL000398601
Shipment Date:	2019-11-14
Manifest Number:	020592444JJK
Line Number:	1
Method Code:	H141
Quantity Tons:	0.00300
Quantity Waste:	6.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	Fiberboard or plastic drums, barrels, kegs
Quantity Type:	Pounds
Federal Code:	D035
Year:	2019
EM Manifest ID:	737814
Generator EPA ID:	CAL000398601
Shipment Date:	2019-11-14
Manifest Number:	020592444JJK

WEST MARINE #1299 (Continued) **S118937850**

Line Number:	1
Method Code:	H141
Quantity Tons:	0.00300
Quantity Waste:	6.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	Fiberboard or plastic drums, barrels, kegs
Quantity Type:	Pounds
Federal Code:	D039

Year:	2019
EM Manifest ID:	737814
Generator EPA ID:	CAL000398601
Shipment Date:	2019-11-14
Manifest Number:	020592444JJK
Line Number:	2
Method Code:	H141
Quantity Tons:	0.02400
Quantity Waste:	48.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	Fiber or plastic boxes, cartons, cases
Quantity Type:	Pounds
Federal Code:	D001

Year:	2019
EM Manifest ID:	737814
Generator EPA ID:	CAL000398601
Shipment Date:	2019-11-14
Manifest Number:	020592444JJK
Line Number:	2
Method Code:	H141
Quantity Tons:	0.02400
Quantity Waste:	48.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	Fiber or plastic boxes, cartons, cases
Quantity Type:	Pounds
Federal Code:	D004

Year:	2019
EM Manifest ID:	737814
Generator EPA ID:	CAL000398601
Shipment Date:	2019-11-14
Manifest Number:	020592444JJK
Line Number:	2
Method Code:	H141
Quantity Tons:	0.02400
Quantity Waste:	48.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	Fiber or plastic boxes, cartons, cases
Quantity Type:	Pounds
Federal Code:	D005

Year:	2019
EM Manifest ID:	737814

WEST MARINE #1299 (Continued) **S118937850**

Generator EPA ID:	CAL000398601
Shipment Date:	2019-11-14
Manifest Number:	020592444JJK
Line Number:	2
Method Code:	H141
Quantity Tons:	0.02400
Quantity Waste:	48.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	Fiber or plastic boxes, cartons, cases
Quantity Type:	Pounds
Federal Code:	D006

Year:	2019
EM Manifest ID:	737814
Generator EPA ID:	CAL000398601
Shipment Date:	2019-11-14
Manifest Number:	020592444JJK
Line Number:	2
Method Code:	H141
Quantity Tons:	0.02400
Quantity Waste:	48.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	Fiber or plastic boxes, cartons, cases
Quantity Type:	Pounds
Federal Code:	D007

Year:	2019
EM Manifest ID:	737814
Generator EPA ID:	CAL000398601
Shipment Date:	2019-11-14
Manifest Number:	020592444JJK
Line Number:	2
Method Code:	H141
Quantity Tons:	0.02400
Quantity Waste:	48.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	Fiber or plastic boxes, cartons, cases
Quantity Type:	Pounds
Federal Code:	D008

Year:	2019
EM Manifest ID:	737814
Generator EPA ID:	CAL000398601
Shipment Date:	2019-11-14
Manifest Number:	020592444JJK
Line Number:	2
Method Code:	H141
Quantity Tons:	0.02400
Quantity Waste:	48.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	Fiber or plastic boxes, cartons, cases
Quantity Type:	Pounds
Federal Code:	D010

WEST MARINE #1299 (Continued) **S118937850**

Year:	2019
EM Manifest ID:	737814
Generator EPA ID:	CAL000398601
Shipment Date:	2019-11-14
Manifest Number:	020592444JJK
Line Number:	2
Method Code:	H141
Quantity Tons:	0.02400
Quantity Waste:	48.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	Fiber or plastic boxes, cartons, cases
Quantity Type:	Pounds
Federal Code:	D011

Year:	2019
EM Manifest ID:	737814
Generator EPA ID:	CAL000398601
Shipment Date:	2019-11-14
Manifest Number:	020592444JJK
Line Number:	2
Method Code:	H141
Quantity Tons:	0.02400
Quantity Waste:	48.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	Fiber or plastic boxes, cartons, cases
Quantity Type:	Pounds
Federal Code:	D018

Year:	2019
EM Manifest ID:	737814
Generator EPA ID:	CAL000398601
Shipment Date:	2019-11-14
Manifest Number:	020592444JJK
Line Number:	2
Method Code:	H141
Quantity Tons:	0.02400
Quantity Waste:	48.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	Fiber or plastic boxes, cartons, cases
Quantity Type:	Pounds
Federal Code:	D027

Year:	2019
EM Manifest ID:	737814
Generator EPA ID:	CAL000398601
Shipment Date:	2019-11-14
Manifest Number:	020592444JJK
Line Number:	2
Method Code:	H141
Quantity Tons:	0.02400
Quantity Waste:	48.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	Fiber or plastic boxes, cartons, cases

WEST MARINE #1299 (Continued) **S118937850**

Quantity Type:	Pounds
Federal Code:	D035
Year:	2019
EM Manifest ID:	737814
Generator EPA ID:	CAL000398601
Shipment Date:	2019-11-14
Manifest Number:	020592444JJK
Line Number:	2
Method Code:	H141
Quantity Tons:	0.02400
Quantity Waste:	48.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	Fiber or plastic boxes, cartons, cases
Quantity Type:	Pounds
Federal Code:	U002
Year:	2019
EM Manifest ID:	737814
Generator EPA ID:	CAL000398601
Shipment Date:	2019-11-14
Manifest Number:	020592444JJK
Line Number:	2
Method Code:	H141
Quantity Tons:	0.02400
Quantity Waste:	48.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	Fiber or plastic boxes, cartons, cases
Quantity Type:	Pounds
Federal Code:	U154
Year:	2019
EM Manifest ID:	737814
Generator EPA ID:	CAL000398601
Shipment Date:	2019-11-14
Manifest Number:	020592444JJK
Line Number:	2
Method Code:	H141
Quantity Tons:	0.02400
Quantity Waste:	48.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	Fiber or plastic boxes, cartons, cases
Quantity Type:	Pounds
Federal Code:	U159
Year:	2019
EM Manifest ID:	737814
Generator EPA ID:	CAL000398601
Shipment Date:	2019-11-14
Manifest Number:	020592444JJK
Line Number:	3
Method Code:	H141
Quantity Tons:	0.00050
Quantity Waste:	1.000000

WEST MARINE #1299 (Continued) **S118937850**

Quantity Unit:	P
Number of Containers:	1
Type of Container:	Fiberboard or plastic drums, barrels, kegs
Quantity Type:	Pounds
Federal Code:	D001
Year:	2019
EM Manifest ID:	737814
Generator EPA ID:	CAL000398601
Shipment Date:	2019-11-14
Manifest Number:	020592444JJK
Line Number:	3
Method Code:	H141
Quantity Tons:	0.00050
Quantity Waste:	1.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	Fiberboard or plastic drums, barrels, kegs
Quantity Type:	Pounds
Federal Code:	D035
Year:	2019
EM Manifest ID:	737814
Generator EPA ID:	CAL000398601
Shipment Date:	2019-11-14
Manifest Number:	020592444JJK
Line Number:	4
Method Code:	H141
Quantity Tons:	0.00800
Quantity Waste:	16.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	Fiberboard or plastic drums, barrels, kegs
Quantity Type:	Pounds
Federal Code:	D002
Year:	2019
EM Manifest ID:	737814
Generator EPA ID:	CAL000398601
Shipment Date:	2019-11-14
Manifest Number:	020592444JJK
Line Number:	4
Method Code:	H141
Quantity Tons:	0.00800
Quantity Waste:	16.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	Fiberboard or plastic drums, barrels, kegs
Quantity Type:	Pounds
Federal Code:	D008
Year:	2019
EM Manifest ID:	737814
Generator EPA ID:	CAL000398601
Shipment Date:	2019-11-14
Manifest Number:	020592444JJK
Line Number:	4

WEST MARINE #1299 (Continued) **S118937850**

Method Code:	H141
Quantity Tons:	0.00800
Quantity Waste:	16.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	Fiberboard or plastic drums, barrels, kegs
Quantity Type:	Pounds
Federal Code:	D011
Year:	2019
EM Manifest ID:	737814
Generator EPA ID:	CAL000398601
Shipment Date:	2019-11-14
Manifest Number:	020592444JJK
Line Number:	9
Method Code:	H132
Quantity Tons:	0.00050
Quantity Waste:	1.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	Fiberboard or plastic drums, barrels, kegs
Quantity Type:	Pounds
Federal Code:	D002

State:

Year:	2019
EM Manifest ID:	737814
Generator EPA ID:	CAL000398601
Shipment Date:	2019-11-14
Manifest Number:	020592444JJK
Line Number:	1
Method Code:	H141
Quantity Tons:	0.00300
Quantity Waste:	6.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	Fiberboard or plastic drums, barrels, kegs
Quantity Type:	Pounds
State Code:	331
Year:	2019
EM Manifest ID:	737814
Generator EPA ID:	CAL000398601
Shipment Date:	2019-11-14
Manifest Number:	020592444JJK
Line Number:	2
Method Code:	H141
Quantity Tons:	0.02400
Quantity Waste:	48.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	Fiber or plastic boxes, cartons, cases
Quantity Type:	Pounds
State Code:	331
Year:	2019
EM Manifest ID:	737814

WEST MARINE #1299 (Continued) **S118937850**

Generator EPA ID: CAL000398601
Shipment Date: 2019-11-14
Manifest Number: 020592444JJK
Line Number: 3
Method Code: H141
Quantity Tons: 0.00050
Quantity Waste: 1.000000
Quantity Unit: P
Number of Containers: 1
Type of Container: Fiberboard or plastic drums, barrels, kegs
Quantity Type: Pounds
State Code: 271

Year: 2019
EM Manifest ID: 737814
Generator EPA ID: CAL000398601
Shipment Date: 2019-11-14
Manifest Number: 020592444JJK
Line Number: 4
Method Code: H141
Quantity Tons: 0.00800
Quantity Waste: 16.000000
Quantity Unit: P
Number of Containers: 1
Type of Container: Fiberboard or plastic drums, barrels, kegs
Quantity Type: Pounds
State Code: 792

Year: 2019
EM Manifest ID: 737814
Generator EPA ID: CAL000398601
Shipment Date: 2019-11-14
Manifest Number: 020592444JJK
Line Number: 5
Method Code: H141
Quantity Tons: 0.00700
Quantity Waste: 14.000000
Quantity Unit: P
Number of Containers: 1
Type of Container: Cylinders
Quantity Type: Pounds
State Code: 352

Year: 2019
EM Manifest ID: 737814
Generator EPA ID: CAL000398601
Shipment Date: 2019-11-14
Manifest Number: 020592444JJK
Line Number: 6
Method Code: H132
Quantity Tons: 0.00500
Quantity Waste: 10.000000
Quantity Unit: P
Number of Containers: 1
Type of Container: Fiberboard or plastic drums, barrels, kegs
Quantity Type: Pounds
State Code: 181

WEST MARINE #1299 (Continued) **S118937850**

Year:	2019
EM Manifest ID:	737814
Generator EPA ID:	CAL000398601
Shipment Date:	2019-11-14
Manifest Number:	020592444JJK
Line Number:	7
Method Code:	H141
Quantity Tons:	0.02450
Quantity Waste:	49.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	Fiberboard or plastic drums, barrels, kegs
Quantity Type:	Pounds
State Code:	221

Year:	2019
EM Manifest ID:	737814
Generator EPA ID:	CAL000398601
Shipment Date:	2019-11-14
Manifest Number:	020592444JJK
Line Number:	8
Method Code:	H132
Quantity Tons:	0.03200
Quantity Waste:	64.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	Metal drums, barrels, kegs
Quantity Type:	Pounds
State Code:	141

Year:	2019
EM Manifest ID:	737814
Generator EPA ID:	CAL000398601
Shipment Date:	2019-11-14
Manifest Number:	020592444JJK
Line Number:	8
Method Code:	H132
Quantity Tons:	0.03200
Quantity Waste:	64.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	Metal drums, barrels, kegs
Quantity Type:	Pounds
State Code:	331

Year:	2019
EM Manifest ID:	737814
Generator EPA ID:	CAL000398601
Shipment Date:	2019-11-14
Manifest Number:	020592444JJK
Line Number:	9
Method Code:	H132
Quantity Tons:	0.00050
Quantity Waste:	1.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	Fiberboard or plastic drums, barrels, kegs

WEST MARINE #1299 (Continued) **S118937850**

Quantity Type: Pounds
State Code: 331

Detail Two:
Year: 2018
EM Manifest ID: 018820587JJK20180531_D_1
Shipment Date: 5/31/2018
Receipt Date: 6/29/2018
Manifest Number: 018820587JJK
Generator EPA ID: CAL000398601
Name: WEST MARINE #1299
Address: Not reported
Address 2: Not reported
City: Not reported
Zip: Not reported
Telephone: Not reported
Contact: Not reported
Contact Telephone: Not reported
Transporter 1 EPA ID: MIK435642742
Transporter 1 Emergency Number: Not reported
Transporter 2 EPA ID: NED986382133
Transporter 2 Emergency Number: Not reported
TSDF EPA ID: IDD073114654
TSDF Name: US ECOLOGY IDAHO INC
TSDF Address 1: Not reported
TSDF Address 2: Not reported
TSDF City: Not reported
TSDF Zip: Not reported
TSDF Telephone: Not reported

Federal:
Year: 2018
EM Manifest ID: 018820587JJK20180531_D_1
Generator EPA ID: CAL000398601
Shipment Date: 2018-05-31
Manifest Number: 018820587JJK
Line Number: 1
Method Code: H141
Quantity Tons: 0.00050
Quantity Waste: 1.000000
Quantity Unit: P
Number of Containers: 1
Type of Container: NULL
Quantity Type: NULL
Federal Code: D001

Year: 2018
EM Manifest ID: 018820587JJK20180531_D_1
Generator EPA ID: CAL000398601
Shipment Date: 2018-05-31
Manifest Number: 018820587JJK
Line Number: 1
Method Code: H141
Quantity Tons: 0.00050
Quantity Waste: 1.000000
Quantity Unit: P

WEST MARINE #1299 (Continued) **S118937850**

Number of Containers:	1
Type of Container:	NULL
Quantity Type:	NULL
Federal Code:	D007
Year:	2018
EM Manifest ID:	018820587JJK20180531_D_1
Generator EPA ID:	CAL000398601
Shipment Date:	2018-05-31
Manifest Number:	018820587JJK
Line Number:	1
Method Code:	H141
Quantity Tons:	0.00050
Quantity Waste:	1.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	NULL
Quantity Type:	NULL
Federal Code:	D008
Year:	2018
EM Manifest ID:	018820587JJK20180531_D_1
Generator EPA ID:	CAL000398601
Shipment Date:	2018-05-31
Manifest Number:	018820587JJK
Line Number:	1
Method Code:	H141
Quantity Tons:	0.00050
Quantity Waste:	1.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	NULL
Quantity Type:	NULL
Federal Code:	D035
Year:	2018
EM Manifest ID:	018820587JJK20180531_D_1
Generator EPA ID:	CAL000398601
Shipment Date:	2018-05-31
Manifest Number:	018820587JJK
Line Number:	1
Method Code:	H141
Quantity Tons:	0.00050
Quantity Waste:	1.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	NULL
Quantity Type:	NULL
Federal Code:	D039
Year:	2018
EM Manifest ID:	018820587JJK20180531_D_1
Generator EPA ID:	CAL000398601
Shipment Date:	2018-05-31
Manifest Number:	018820587JJK
Line Number:	3
Method Code:	H141

WEST MARINE #1299 (Continued) **S118937850**

Quantity Tons: 0.01500
Quantity Waste: 30.000000
Quantity Unit: P
Number of Containers: 1
Type of Container: NULL
Quantity Type: NULL
Federal Code: D001

Year: 2018
EM Manifest ID: 018820587JJK20180531_D_1
Generator EPA ID: CAL000398601
Shipment Date: 2018-05-31
Manifest Number: 018820587JJK
Line Number: 3
Method Code: H141
Quantity Tons: 0.01500
Quantity Waste: 30.000000
Quantity Unit: P
Number of Containers: 1
Type of Container: NULL
Quantity Type: NULL
Federal Code: D004

Year: 2018
EM Manifest ID: 018820587JJK20180531_D_1
Generator EPA ID: CAL000398601
Shipment Date: 2018-05-31
Manifest Number: 018820587JJK
Line Number: 3
Method Code: H141
Quantity Tons: 0.01500
Quantity Waste: 30.000000
Quantity Unit: P
Number of Containers: 1
Type of Container: NULL
Quantity Type: NULL
Federal Code: U002

Year: 2018
EM Manifest ID: 018820587JJK20180531_D_1
Generator EPA ID: CAL000398601
Shipment Date: 2018-05-31
Manifest Number: 018820587JJK
Line Number: 3
Method Code: H141
Quantity Tons: 0.01500
Quantity Waste: 30.000000
Quantity Unit: P
Number of Containers: 1
Type of Container: NULL
Quantity Type: NULL
Federal Code: U154

Year: 2018
EM Manifest ID: 018820587JJK20180531_D_1
Generator EPA ID: CAL000398601
Shipment Date: 2018-05-31

WEST MARINE #1299 (Continued) **S118937850**

Manifest Number:	018820587JJK
Line Number:	3
Method Code:	H141
Quantity Tons:	0.01500
Quantity Waste:	30.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	NULL
Quantity Type:	NULL
Federal Code:	U159
Year:	2018
EM Manifest ID:	018820587JJK20180531_D_1
Generator EPA ID:	CAL000398601
Shipment Date:	2018-05-31
Manifest Number:	018820587JJK
Line Number:	4
Method Code:	H110
Quantity Tons:	0.00050
Quantity Waste:	1.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	NULL
Quantity Type:	NULL
Federal Code:	D008
Year:	2018
EM Manifest ID:	018820587JJK20180531_D_1
Generator EPA ID:	CAL000398601
Shipment Date:	2018-05-31
Manifest Number:	018820587JJK
Line Number:	4
Method Code:	H110
Quantity Tons:	0.00050
Quantity Waste:	1.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	NULL
Quantity Type:	NULL
Federal Code:	D009
Year:	2018
EM Manifest ID:	018820587JJK20180531_D_1
Generator EPA ID:	CAL000398601
Shipment Date:	2018-05-31
Manifest Number:	018820587JJK
Line Number:	5
Method Code:	H110
Quantity Tons:	0.00050
Quantity Waste:	1.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	NULL
Quantity Type:	NULL
Federal Code:	D001

WEST MARINE #1299 (Continued) **S118937850**

State:

Year:	2018
EM Manifest ID:	018820587JJK20180531_D_1
Generator EPA ID:	CAL000398601
Shipment Date:	2018-05-31
Manifest Number:	018820587JJK
Line Number:	1
Method Code:	H141
Quantity Tons:	0.00050
Quantity Waste:	1.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	NULL
Quantity Type:	NULL
State Code:	331

Year:	2018
EM Manifest ID:	018820587JJK20180531_D_1
Generator EPA ID:	CAL000398601
Shipment Date:	2018-05-31
Manifest Number:	018820587JJK
Line Number:	2
Method Code:	H132
Quantity Tons:	0.00550
Quantity Waste:	11.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	NULL
Quantity Type:	NULL
State Code:	513

Year:	2018
EM Manifest ID:	018820587JJK20180531_D_1
Generator EPA ID:	CAL000398601
Shipment Date:	2018-05-31
Manifest Number:	018820587JJK
Line Number:	3
Method Code:	H141
Quantity Tons:	0.01500
Quantity Waste:	30.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	NULL
Quantity Type:	NULL
State Code:	331

Year:	2018
EM Manifest ID:	018820587JJK20180531_D_1
Generator EPA ID:	CAL000398601
Shipment Date:	2018-05-31
Manifest Number:	018820587JJK
Line Number:	4
Method Code:	H110
Quantity Tons:	0.00050
Quantity Waste:	1.000000
Quantity Unit:	P
Number of Containers:	1

WEST MARINE #1299 (Continued) **S118937850**

Type of Container:	NULL
Quantity Type:	NULL
State Code:	181
Year:	2018
EM Manifest ID:	018820587JJK20180531_D_1
Generator EPA ID:	CAL000398601
Shipment Date:	2018-05-31
Manifest Number:	018820587JJK
Line Number:	5
Method Code:	H110
Quantity Tons:	0.00050
Quantity Waste:	1.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	NULL
Quantity Type:	NULL
State Code:	331
Year:	2018
EM Manifest ID:	018820587JJK20180531_D_1
Generator EPA ID:	CAL000398601
Shipment Date:	2018-05-31
Manifest Number:	018820587JJK
Line Number:	6
Method Code:	Not reported
Quantity Tons:	0.00050
Quantity Waste:	1.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	NULL
Quantity Type:	NULL
State Code:	181
Year:	2018
EM Manifest ID:	018820587JJK20180531_D_1
Generator EPA ID:	CAL000398601
Shipment Date:	2018-05-31
Manifest Number:	018820587JJK
Line Number:	8
Method Code:	Not reported
Quantity Tons:	0.01450
Quantity Waste:	29.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	NULL
Quantity Type:	NULL
State Code:	141
Year:	2018
EM Manifest ID:	018820587JJK20180531_D_1
Generator EPA ID:	CAL000398601
Shipment Date:	2018-05-31
Manifest Number:	018820587JJK
Line Number:	9
Method Code:	Not reported
Quantity Tons:	0.01250

WEST MARINE #1299 (Continued) **S118937850**

Quantity Waste: 25.000000
Quantity Unit: P
Number of Containers: 1
Type of Container: NULL
Quantity Type: NULL
State Code: 181

Year: 2018
EM Manifest ID: 017602940JJK20171207_D_1
Shipment Date: 12/7/2017
Receipt Date: 12/20/2017
Manifest Number: 017602940JJK
Generator EPA ID: CAL000398601
Name: WEST MARINE #1299
Address: Not reported
Address 2: Not reported
City: Not reported
Zip: Not reported
Telephone: Not reported
Contact: Not reported
Contact Telephone: Not reported
Transporter 1 EPA ID: MIK435642742
Transporter 1 Emergency Number: Not reported
Transporter 2 EPA ID: ALR000007237
Transporter 2 Emergency Number: Not reported
TSDF EPA ID: NVT330010000
TSDF Name: US ECOLOGY INC
TSDF Address 1: Not reported
TSDF Address 2: Not reported
TSDF City: Not reported
TSDF Zip: Not reported
TSDF Telephone: Not reported

Federal:
Year: 2018
EM Manifest ID: 017602940JJK20171207_D_1
Generator EPA ID: CAL000398601
Shipment Date: 2017-12-07
Manifest Number: 017602940JJK
Line Number: 1
Method Code: H141
Quantity Tons: 0.04400
Quantity Waste: 88.000000
Quantity Unit: P
Number of Containers: 1
Type of Container: NULL
Quantity Type: NULL
Federal Code: D001

Year: 2018
EM Manifest ID: 017602940JJK20171207_D_1
Generator EPA ID: CAL000398601
Shipment Date: 2017-12-07
Manifest Number: 017602940JJK
Line Number: 1
Method Code: H141
Quantity Tons: 0.04400

WEST MARINE #1299 (Continued) **S118937850**

Quantity Waste:	88.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	NULL
Quantity Type:	NULL
Federal Code:	D004
Year:	2018
EM Manifest ID:	017602940JJK20171207_D_1
Generator EPA ID:	CAL000398601
Shipment Date:	2017-12-07
Manifest Number:	017602940JJK
Line Number:	1
Method Code:	H141
Quantity Tons:	0.04400
Quantity Waste:	88.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	NULL
Quantity Type:	NULL
Federal Code:	D018
Year:	2018
EM Manifest ID:	017602940JJK20171207_D_1
Generator EPA ID:	CAL000398601
Shipment Date:	2017-12-07
Manifest Number:	017602940JJK
Line Number:	1
Method Code:	H141
Quantity Tons:	0.04400
Quantity Waste:	88.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	NULL
Quantity Type:	NULL
Federal Code:	U002
Year:	2018
EM Manifest ID:	017602940JJK20171207_D_1
Generator EPA ID:	CAL000398601
Shipment Date:	2017-12-07
Manifest Number:	017602940JJK
Line Number:	1
Method Code:	H141
Quantity Tons:	0.04400
Quantity Waste:	88.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	NULL
Quantity Type:	NULL
Federal Code:	U154
Year:	2018
EM Manifest ID:	017602940JJK20171207_D_1
Generator EPA ID:	CAL000398601
Shipment Date:	2017-12-07
Manifest Number:	017602940JJK

WEST MARINE #1299 (Continued) **S118937850**

Line Number: 2
Method Code: H132
Quantity Tons: 0.00700
Quantity Waste: 14.000000
Quantity Unit: P
Number of Containers: 1
Type of Container: NULL
Quantity Type: NULL
Federal Code: D002

Year: 2018
EM Manifest ID: 017602940JJK20171207_D_1
Generator EPA ID: CAL000398601
Shipment Date: 2017-12-07
Manifest Number: 017602940JJK
Line Number: 2
Method Code: H132
Quantity Tons: 0.00700
Quantity Waste: 14.000000
Quantity Unit: P
Number of Containers: 1
Type of Container: NULL
Quantity Type: NULL
Federal Code: D008

Year: 2018
EM Manifest ID: 017602940JJK20171207_D_1
Generator EPA ID: CAL000398601
Shipment Date: 2017-12-07
Manifest Number: 017602940JJK
Line Number: 2
Method Code: H132
Quantity Tons: 0.00700
Quantity Waste: 14.000000
Quantity Unit: P
Number of Containers: 1
Type of Container: NULL
Quantity Type: NULL
Federal Code: D011

State:
Year: 2018
EM Manifest ID: 017602940JJK20171207_D_1
Generator EPA ID: CAL000398601
Shipment Date: 2017-12-07
Manifest Number: 017602940JJK
Line Number: 1
Method Code: H141
Quantity Tons: 0.04400
Quantity Waste: 88.000000
Quantity Unit: P
Number of Containers: 1
Type of Container: NULL
Quantity Type: NULL
State Code: 331

Year: 2018

WEST MARINE #1299 (Continued) **S118937850**

EM Manifest ID: 017602940JJK20171207_D_1
Generator EPA ID: CAL000398601
Shipment Date: 2017-12-07
Manifest Number: 017602940JJK
Line Number: 2
Method Code: H132
Quantity Tons: 0.00700
Quantity Waste: 14.000000
Quantity Unit: P
Number of Containers: 1
Type of Container: NULL
Quantity Type: NULL
State Code: 792

Year: 2018
EM Manifest ID: 199849
Shipment Date: 11/20/2018
Receipt Date: 12/4/2018
Manifest Number: 018820250JJK
Generator EPA ID: CAL000398601
Name: WEST MARINE #1299
Address: 192 DONAHUE ST
Address 2: Not reported
City: SAUSALITO
Zip: 94964
Telephone: 954-993-9538
Contact: Not reported
Contact Telephone: 831-761-4925
Transporter 1 EPA ID: MIK435642742
Transporter 1 Emergency Number: Not reported
Transporter 2 EPA ID: MOD095038998
Transporter 2 Emergency Number: Not reported
TSDF EPA ID: NVT330010000
TSDF Name: US ECOLOGY NEVADA, INC
TSDF Address 1: HWY 95 11 MI S OF BEATTY
TSDF Address 2: Not reported
TSDF City: BEATTY
TSDF Zip: 89003
TSDF Telephone: 800-839-3975

Federal:
Year: 2018
EM Manifest ID: 199849
Generator EPA ID: CAL000398601
Shipment Date: 2018-11-20
Manifest Number: 018820250JJK
Line Number: 1
Method Code: H141
Quantity Tons: 0.00200
Quantity Waste: 4.000000
Quantity Unit: P
Number of Containers: 1
Type of Container: Fiberboard or plastic drums, barrels, kegs
Quantity Type: Pounds
Federal Code: D001

Year: 2018

WEST MARINE #1299 (Continued) **S118937850**

EM Manifest ID:	199849
Generator EPA ID:	CAL000398601
Shipment Date:	2018-11-20
Manifest Number:	018820250JJK
Line Number:	1
Method Code:	H141
Quantity Tons:	0.00200
Quantity Waste:	4.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	Fiberboard or plastic drums, barrels, kegs
Quantity Type:	Pounds
Federal Code:	D007

Year:	2018
EM Manifest ID:	199849
Generator EPA ID:	CAL000398601
Shipment Date:	2018-11-20
Manifest Number:	018820250JJK
Line Number:	1
Method Code:	H141
Quantity Tons:	0.00200
Quantity Waste:	4.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	Fiberboard or plastic drums, barrels, kegs
Quantity Type:	Pounds
Federal Code:	D008

Year:	2018
EM Manifest ID:	199849
Generator EPA ID:	CAL000398601
Shipment Date:	2018-11-20
Manifest Number:	018820250JJK
Line Number:	1
Method Code:	H141
Quantity Tons:	0.00200
Quantity Waste:	4.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	Fiberboard or plastic drums, barrels, kegs
Quantity Type:	Pounds
Federal Code:	D035

Year:	2018
EM Manifest ID:	199849
Generator EPA ID:	CAL000398601
Shipment Date:	2018-11-20
Manifest Number:	018820250JJK
Line Number:	1
Method Code:	H141
Quantity Tons:	0.00200
Quantity Waste:	4.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	Fiberboard or plastic drums, barrels, kegs
Quantity Type:	Pounds

WEST MARINE #1299 (Continued) **S118937850**

Federal Code:	D039
Year:	2018
EM Manifest ID:	199849
Generator EPA ID:	CAL000398601
Shipment Date:	2018-11-20
Manifest Number:	018820250JJK
Line Number:	2
Method Code:	H141
Quantity Tons:	0.03600
Quantity Waste:	72.000000
Quantity Unit:	P
Number of Containers:	4
Type of Container:	Metal drums, barrels, kegs
Quantity Type:	Pounds
Federal Code:	D001
Year:	2018
EM Manifest ID:	199849
Generator EPA ID:	CAL000398601
Shipment Date:	2018-11-20
Manifest Number:	018820250JJK
Line Number:	2
Method Code:	H141
Quantity Tons:	0.03600
Quantity Waste:	72.000000
Quantity Unit:	P
Number of Containers:	4
Type of Container:	Metal drums, barrels, kegs
Quantity Type:	Pounds
Federal Code:	D004
Year:	2018
EM Manifest ID:	199849
Generator EPA ID:	CAL000398601
Shipment Date:	2018-11-20
Manifest Number:	018820250JJK
Line Number:	2
Method Code:	H141
Quantity Tons:	0.03600
Quantity Waste:	72.000000
Quantity Unit:	P
Number of Containers:	4
Type of Container:	Metal drums, barrels, kegs
Quantity Type:	Pounds
Federal Code:	D005
Year:	2018
EM Manifest ID:	199849
Generator EPA ID:	CAL000398601
Shipment Date:	2018-11-20
Manifest Number:	018820250JJK
Line Number:	2
Method Code:	H141
Quantity Tons:	0.03600
Quantity Waste:	72.000000
Quantity Unit:	P

WEST MARINE #1299 (Continued) **S118937850**

Number of Containers:	4
Type of Container:	Metal drums, barrels, kegs
Quantity Type:	Pounds
Federal Code:	D006
Year:	2018
EM Manifest ID:	199849
Generator EPA ID:	CAL000398601
Shipment Date:	2018-11-20
Manifest Number:	018820250JJK
Line Number:	2
Method Code:	H141
Quantity Tons:	0.03600
Quantity Waste:	72.000000
Quantity Unit:	P
Number of Containers:	4
Type of Container:	Metal drums, barrels, kegs
Quantity Type:	Pounds
Federal Code:	D007
Year:	2018
EM Manifest ID:	199849
Generator EPA ID:	CAL000398601
Shipment Date:	2018-11-20
Manifest Number:	018820250JJK
Line Number:	2
Method Code:	H141
Quantity Tons:	0.03600
Quantity Waste:	72.000000
Quantity Unit:	P
Number of Containers:	4
Type of Container:	Metal drums, barrels, kegs
Quantity Type:	Pounds
Federal Code:	D008
Year:	2018
EM Manifest ID:	199849
Generator EPA ID:	CAL000398601
Shipment Date:	2018-11-20
Manifest Number:	018820250JJK
Line Number:	2
Method Code:	H141
Quantity Tons:	0.03600
Quantity Waste:	72.000000
Quantity Unit:	P
Number of Containers:	4
Type of Container:	Metal drums, barrels, kegs
Quantity Type:	Pounds
Federal Code:	D010
Year:	2018
EM Manifest ID:	199849
Generator EPA ID:	CAL000398601
Shipment Date:	2018-11-20
Manifest Number:	018820250JJK
Line Number:	2
Method Code:	H141

WEST MARINE #1299 (Continued) **S118937850**

Quantity Tons:	0.03600
Quantity Waste:	72.000000
Quantity Unit:	P
Number of Containers:	4
Type of Container:	Metal drums, barrels, kegs
Quantity Type:	Pounds
Federal Code:	D011
Year:	2018
EM Manifest ID:	199849
Generator EPA ID:	CAL000398601
Shipment Date:	2018-11-20
Manifest Number:	018820250JJK
Line Number:	2
Method Code:	H141
Quantity Tons:	0.03600
Quantity Waste:	72.000000
Quantity Unit:	P
Number of Containers:	4
Type of Container:	Metal drums, barrels, kegs
Quantity Type:	Pounds
Federal Code:	D018
Year:	2018
EM Manifest ID:	199849
Generator EPA ID:	CAL000398601
Shipment Date:	2018-11-20
Manifest Number:	018820250JJK
Line Number:	2
Method Code:	H141
Quantity Tons:	0.03600
Quantity Waste:	72.000000
Quantity Unit:	P
Number of Containers:	4
Type of Container:	Metal drums, barrels, kegs
Quantity Type:	Pounds
Federal Code:	D027
Year:	2018
EM Manifest ID:	199849
Generator EPA ID:	CAL000398601
Shipment Date:	2018-11-20
Manifest Number:	018820250JJK
Line Number:	2
Method Code:	H141
Quantity Tons:	0.03600
Quantity Waste:	72.000000
Quantity Unit:	P
Number of Containers:	4
Type of Container:	Metal drums, barrels, kegs
Quantity Type:	Pounds
Federal Code:	D035
Year:	2018
EM Manifest ID:	199849
Generator EPA ID:	CAL000398601
Shipment Date:	2018-11-20

WEST MARINE #1299 (Continued) **S118937850**

Manifest Number:	018820250JJK
Line Number:	2
Method Code:	H141
Quantity Tons:	0.03600
Quantity Waste:	72.000000
Quantity Unit:	P
Number of Containers:	4
Type of Container:	Metal drums, barrels, kegs
Quantity Type:	Pounds
Federal Code:	U002

Year:	2018
EM Manifest ID:	199849
Generator EPA ID:	CAL000398601
Shipment Date:	2018-11-20
Manifest Number:	018820250JJK
Line Number:	2
Method Code:	H141
Quantity Tons:	0.03600
Quantity Waste:	72.000000
Quantity Unit:	P
Number of Containers:	4
Type of Container:	Metal drums, barrels, kegs
Quantity Type:	Pounds
Federal Code:	U154

Year:	2018
EM Manifest ID:	199849
Generator EPA ID:	CAL000398601
Shipment Date:	2018-11-20
Manifest Number:	018820250JJK
Line Number:	2
Method Code:	H141
Quantity Tons:	0.03600
Quantity Waste:	72.000000
Quantity Unit:	P
Number of Containers:	4
Type of Container:	Metal drums, barrels, kegs
Quantity Type:	Pounds
Federal Code:	U159

Year:	2018
EM Manifest ID:	199849
Generator EPA ID:	CAL000398601
Shipment Date:	2018-11-20
Manifest Number:	018820250JJK
Line Number:	3
Method Code:	H141
Quantity Tons:	0.00050
Quantity Waste:	1.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	Fiberboard or plastic drums, barrels, kegs
Quantity Type:	Pounds
Federal Code:	D001

WEST MARINE #1299 (Continued) **S118937850**

State:

Year:	2018
EM Manifest ID:	199849
Generator EPA ID:	CAL000398601
Shipment Date:	2018-11-20
Manifest Number:	018820250JJK
Line Number:	1
Method Code:	H141
Quantity Tons:	0.00200
Quantity Waste:	4.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	Fiberboard or plastic drums, barrels, kegs
Quantity Type:	Pounds
State Code:	331

Year:	2018
EM Manifest ID:	199849
Generator EPA ID:	CAL000398601
Shipment Date:	2018-11-20
Manifest Number:	018820250JJK
Line Number:	2
Method Code:	H141
Quantity Tons:	0.03600
Quantity Waste:	72.000000
Quantity Unit:	P
Number of Containers:	4
Type of Container:	Metal drums, barrels, kegs
Quantity Type:	Pounds
State Code:	331

Year:	2018
EM Manifest ID:	199849
Generator EPA ID:	CAL000398601
Shipment Date:	2018-11-20
Manifest Number:	018820250JJK
Line Number:	3
Method Code:	H141
Quantity Tons:	0.00050
Quantity Waste:	1.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	Fiberboard or plastic drums, barrels, kegs
Quantity Type:	Pounds
State Code:	141

Year:	2018
EM Manifest ID:	199849
Generator EPA ID:	CAL000398601
Shipment Date:	2018-11-20
Manifest Number:	018820250JJK
Line Number:	4
Method Code:	H039
Quantity Tons:	0.04250
Quantity Waste:	85.000000
Quantity Unit:	P
Number of Containers:	2

WEST MARINE #1299 (Continued) **S118937850**

Type of Container:	Metal drums, barrels, kegs
Quantity Type:	Pounds
State Code:	141
Year:	2018
EM Manifest ID:	199849
Generator EPA ID:	CAL000398601
Shipment Date:	2018-11-20
Manifest Number:	018820250JJK
Line Number:	4
Method Code:	H039
Quantity Tons:	0.04250
Quantity Waste:	85.000000
Quantity Unit:	P
Number of Containers:	2
Type of Container:	Metal drums, barrels, kegs
Quantity Type:	Pounds
State Code:	331
Year:	2018
EM Manifest ID:	180739
Shipment Date:	11/20/2018
Receipt Date:	11/26/2018
Manifest Number:	018820252JJK
Generator EPA ID:	CAL000398601
Name:	WEST MARINE #1299
Address:	192 DONAHUE ST
Address 2:	Not reported
City:	SAUSALITO
Zip:	94964
Telephone:	954-993-9538
Contact:	Not reported
Contact Telephone:	831-761-4925
Transporter 1 EPA ID:	MIK435642742
Transporter 1 Emergency Number:	Not reported
Transporter 2 EPA ID:	MOD095038998
Transporter 2 Emergency Number:	Not reported
TSDF EPA ID:	OKD000402396
TSDF Name:	US ECOLOGY TULSA, INC
TSDF Address 1:	2700 SOUTH 25TH WEST AVE.
TSDF Address 2:	Not reported
TSDF City:	TULSA
TSDF Zip:	74107
TSDF Telephone:	800-839-3975

Federal:

Year:	2018
EM Manifest ID:	180739
Generator EPA ID:	CAL000398601
Shipment Date:	2018-11-20
Manifest Number:	018820252JJK
Line Number:	2
Method Code:	H141
Quantity Tons:	0.00050
Quantity Waste:	1.000000
Quantity Unit:	P
Number of Containers:	1

WEST MARINE #1299 (Continued) **S118937850**

Type of Container:	Fiberboard or plastic drums, barrels, kegs
Quantity Type:	Pounds
Federal Code:	D001
Year:	2018
EM Manifest ID:	180739
Generator EPA ID:	CAL000398601
Shipment Date:	2018-11-20
Manifest Number:	018820252JJK
Line Number:	2
Method Code:	H141
Quantity Tons:	0.00050
Quantity Waste:	1.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	Fiberboard or plastic drums, barrels, kegs
Quantity Type:	Pounds
Federal Code:	D003
Year:	2018
EM Manifest ID:	180739
Generator EPA ID:	CAL000398601
Shipment Date:	2018-11-20
Manifest Number:	018820252JJK
Line Number:	2
Method Code:	H141
Quantity Tons:	0.00050
Quantity Waste:	1.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	Fiberboard or plastic drums, barrels, kegs
Quantity Type:	Pounds
Federal Code:	D005

State:

Year:	2018
EM Manifest ID:	180739
Generator EPA ID:	CAL000398601
Shipment Date:	2018-11-20
Manifest Number:	018820252JJK
Line Number:	1
Method Code:	H110
Quantity Tons:	0.00400
Quantity Waste:	8.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	Cylinders
Quantity Type:	Pounds
State Code:	181
Year:	2018
EM Manifest ID:	180739
Generator EPA ID:	CAL000398601
Shipment Date:	2018-11-20
Manifest Number:	018820252JJK
Line Number:	2
Method Code:	H141

WEST MARINE #1299 (Continued) **S118937850**

Quantity Tons:	0.00050
Quantity Waste:	1.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	Fiberboard or plastic drums, barrels, kegs
Quantity Type:	Pounds
State Code:	141

Year:	2018
EM Manifest ID:	016028794JJK20171113_D_1
Shipment Date:	11/13/2017
Receipt Date:	12/4/2017
Manifest Number:	016028794JJK
Generator EPA ID:	CAL000398601
Name:	WEST MARINE #1299
Address:	Not reported
Address 2:	Not reported
City:	Not reported
Zip:	Not reported
Telephone:	Not reported
Contact:	Not reported
Contact Telephone:	Not reported
Transporter 1 EPA ID:	MIK435642742
Transporter 1 Emergency Number:	Not reported
Transporter 2 EPA ID:	NED986382133
Transporter 2 Emergency Number:	Not reported
TSDF EPA ID:	NVT330010000
TSDF Name:	US ECOLOGY INC
TSDF Address 1:	Not reported
TSDF Address 2:	Not reported
TSDF City:	Not reported
TSDF Zip:	Not reported
TSDF Telephone:	Not reported

Federal:

Year:	2018
EM Manifest ID:	016028794JJK20171113_D_1
Generator EPA ID:	CAL000398601
Shipment Date:	2017-11-13
Manifest Number:	016028794JJK
Line Number:	1
Method Code:	H141
Quantity Tons:	0.00450
Quantity Waste:	9.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	NULL
Quantity Type:	NULL
Federal Code:	D001

Year:	2018
EM Manifest ID:	016028794JJK20171113_D_1
Generator EPA ID:	CAL000398601
Shipment Date:	2017-11-13
Manifest Number:	016028794JJK
Line Number:	1
Method Code:	H141

WEST MARINE #1299 (Continued) **S118937850**

Quantity Tons: 0.00450
Quantity Waste: 9.000000
Quantity Unit: P
Number of Containers: 1
Type of Container: NULL
Quantity Type: NULL
Federal Code: D007

Year: 2018
EM Manifest ID: 016028794JJK20171113_D_1
Generator EPA ID: CAL000398601
Shipment Date: 2017-11-13
Manifest Number: 016028794JJK
Line Number: 1
Method Code: H141
Quantity Tons: 0.00450
Quantity Waste: 9.000000
Quantity Unit: P
Number of Containers: 1
Type of Container: NULL
Quantity Type: NULL
Federal Code: D008

Year: 2018
EM Manifest ID: 016028794JJK20171113_D_1
Generator EPA ID: CAL000398601
Shipment Date: 2017-11-13
Manifest Number: 016028794JJK
Line Number: 1
Method Code: H141
Quantity Tons: 0.00450
Quantity Waste: 9.000000
Quantity Unit: P
Number of Containers: 1
Type of Container: NULL
Quantity Type: NULL
Federal Code: D035

Year: 2018
EM Manifest ID: 016028794JJK20171113_D_1
Generator EPA ID: CAL000398601
Shipment Date: 2017-11-13
Manifest Number: 016028794JJK
Line Number: 1
Method Code: H141
Quantity Tons: 0.00450
Quantity Waste: 9.000000
Quantity Unit: P
Number of Containers: 1
Type of Container: NULL
Quantity Type: NULL
Federal Code: D038

Year: 2018
EM Manifest ID: 016028794JJK20171113_D_1
Generator EPA ID: CAL000398601
Shipment Date: 2017-11-13

WEST MARINE #1299 (Continued) **S118937850**

Manifest Number:	016028794JJK
Line Number:	2
Method Code:	H141
Quantity Tons:	0.02050
Quantity Waste:	41.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	NULL
Quantity Type:	NULL
Federal Code:	D001

Year:	2018
EM Manifest ID:	016028794JJK20171113_D_1
Generator EPA ID:	CAL000398601
Shipment Date:	2017-11-13
Manifest Number:	016028794JJK
Line Number:	2
Method Code:	H141
Quantity Tons:	0.02050
Quantity Waste:	41.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	NULL
Quantity Type:	NULL
Federal Code:	D004

Year:	2018
EM Manifest ID:	016028794JJK20171113_D_1
Generator EPA ID:	CAL000398601
Shipment Date:	2017-11-13
Manifest Number:	016028794JJK
Line Number:	2
Method Code:	H141
Quantity Tons:	0.02050
Quantity Waste:	41.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	NULL
Quantity Type:	NULL
Federal Code:	D018

Year:	2018
EM Manifest ID:	016028794JJK20171113_D_1
Generator EPA ID:	CAL000398601
Shipment Date:	2017-11-13
Manifest Number:	016028794JJK
Line Number:	2
Method Code:	H141
Quantity Tons:	0.02050
Quantity Waste:	41.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	NULL
Quantity Type:	NULL
Federal Code:	U002

Year:	2018

WEST MARINE #1299 (Continued) **S118937850**

EM Manifest ID:	016028794JJK20171113_D_1
Generator EPA ID:	CAL000398601
Shipment Date:	2017-11-13
Manifest Number:	016028794JJK
Line Number:	2
Method Code:	H141
Quantity Tons:	0.02050
Quantity Waste:	41.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	NULL
Quantity Type:	NULL
Federal Code:	U154

Year:	2018
EM Manifest ID:	016028794JJK20171113_D_1
Generator EPA ID:	CAL000398601
Shipment Date:	2017-11-13
Manifest Number:	016028794JJK
Line Number:	3
Method Code:	H132
Quantity Tons:	0.00700
Quantity Waste:	14.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	NULL
Quantity Type:	NULL
Federal Code:	D002

Year:	2018
EM Manifest ID:	016028794JJK20171113_D_1
Generator EPA ID:	CAL000398601
Shipment Date:	2017-11-13
Manifest Number:	016028794JJK
Line Number:	3
Method Code:	H132
Quantity Tons:	0.00700
Quantity Waste:	14.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	NULL
Quantity Type:	NULL
Federal Code:	D008

Year:	2018
EM Manifest ID:	016028794JJK20171113_D_1
Generator EPA ID:	CAL000398601
Shipment Date:	2017-11-13
Manifest Number:	016028794JJK
Line Number:	3
Method Code:	H132
Quantity Tons:	0.00700
Quantity Waste:	14.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	NULL
Quantity Type:	NULL

WEST MARINE #1299 (Continued) **S118937850**

Federal Code: D011

Year: 2018
EM Manifest ID: 016028794JJK20171113_D_1
Generator EPA ID: CAL000398601
Shipment Date: 2017-11-13
Manifest Number: 016028794JJK
Line Number: 4
Method Code: H039
Quantity Tons: 0.00950
Quantity Waste: 19.000000
Quantity Unit: P
Number of Containers: 1
Type of Container: NULL
Quantity Type: NULL
Federal Code: D002

Year: 2018
EM Manifest ID: 016028794JJK20171113_D_1
Generator EPA ID: CAL000398601
Shipment Date: 2017-11-13
Manifest Number: 016028794JJK
Line Number: 5
Method Code: H132
Quantity Tons: 0.00150
Quantity Waste: 3.000000
Quantity Unit: P
Number of Containers: 1
Type of Container: NULL
Quantity Type: NULL
Federal Code: D008

Year: 2018
EM Manifest ID: 016028794JJK20171113_D_1
Generator EPA ID: CAL000398601
Shipment Date: 2017-11-13
Manifest Number: 016028794JJK
Line Number: 5
Method Code: H132
Quantity Tons: 0.00150
Quantity Waste: 3.000000
Quantity Unit: P
Number of Containers: 1
Type of Container: NULL
Quantity Type: NULL
Federal Code: D009

State:
Year: 2018
EM Manifest ID: 016028794JJK20171113_D_1
Generator EPA ID: CAL000398601
Shipment Date: 2017-11-13
Manifest Number: 016028794JJK
Line Number: 1
Method Code: H141
Quantity Tons: 0.00450
Quantity Waste: 9.000000

WEST MARINE #1299 (Continued) **S118937850**

Quantity Unit:	P
Number of Containers:	1
Type of Container:	NULL
Quantity Type:	NULL
State Code:	331
Year:	2018
EM Manifest ID:	016028794JJK20171113_D_1
Generator EPA ID:	CAL000398601
Shipment Date:	2017-11-13
Manifest Number:	016028794JJK
Line Number:	2
Method Code:	H141
Quantity Tons:	0.02050
Quantity Waste:	41.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	NULL
Quantity Type:	NULL
State Code:	331
Year:	2018
EM Manifest ID:	016028794JJK20171113_D_1
Generator EPA ID:	CAL000398601
Shipment Date:	2017-11-13
Manifest Number:	016028794JJK
Line Number:	3
Method Code:	H132
Quantity Tons:	0.00700
Quantity Waste:	14.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	NULL
Quantity Type:	NULL
State Code:	792
Year:	2018
EM Manifest ID:	016028794JJK20171113_D_1
Generator EPA ID:	CAL000398601
Shipment Date:	2017-11-13
Manifest Number:	016028794JJK
Line Number:	4
Method Code:	H039
Quantity Tons:	0.00950
Quantity Waste:	19.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	NULL
Quantity Type:	NULL
State Code:	121
Year:	2018
EM Manifest ID:	016028794JJK20171113_D_1
Generator EPA ID:	CAL000398601
Shipment Date:	2017-11-13
Manifest Number:	016028794JJK
Line Number:	5

WEST MARINE #1299 (Continued) **S118937850**

Method Code:	H132
Quantity Tons:	0.00150
Quantity Waste:	3.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	NULL
Quantity Type:	NULL
State Code:	181
Year:	2018
EM Manifest ID:	016028794JJK20171113_D_1
Generator EPA ID:	CAL000398601
Shipment Date:	2017-11-13
Manifest Number:	016028794JJK
Line Number:	6
Method Code:	H141
Quantity Tons:	0.00150
Quantity Waste:	3.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	NULL
Quantity Type:	NULL
State Code:	181
Year:	2018
EM Manifest ID:	016028794JJK20171113_D_1
Generator EPA ID:	CAL000398601
Shipment Date:	2017-11-13
Manifest Number:	016028794JJK
Line Number:	7
Method Code:	H141
Quantity Tons:	0.00100
Quantity Waste:	2.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	NULL
Quantity Type:	NULL
State Code:	181
Year:	2018
EM Manifest ID:	016028794JJK20171113_D_1
Generator EPA ID:	CAL000398601
Shipment Date:	2017-11-13
Manifest Number:	016028794JJK
Line Number:	8
Method Code:	H039
Quantity Tons:	0.01350
Quantity Waste:	27.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	NULL
Quantity Type:	NULL
State Code:	141

Additional Info:

Year:	2016

WEST MARINE #1299 (Continued) **S118937850**

Gen EPA ID:	CAL000398601
Shipment Date:	20150916
Creation Date:	5/24/2016 16:38:09
Receipt Date:	20151023
Manifest ID:	009104432JJK
Trans EPA ID:	NED986382133
Trans Name:	SMITH SYSTEMS INC
Trans 2 EPA ID:	Not reported
Trans 2 Name:	Not reported
TSDF EPA ID:	OKD000402396
Trans Name:	EQ OKLAHOMA INC
TSDF Alt EPA ID:	Not reported
TSDF Alt Name:	Not reported
Waste Code Description:	331 - Off-specification, aged, or surplus organics
RCRA Code:	U159
Meth Code:	H141 - Storage, Bulking, And/Or Transfer Off Site--No Treatment/Reovery (H010-H129) Or (H131-H135)
Quantity Tons:	0.0075
Waste Quantity:	15
Quantity Unit:	P
Additional Code 1:	U154
Additional Code 2:	U002
Additional Code 3:	D004
Additional Code 4:	D001
Additional Code 5:	Not reported
Shipment Date:	20150916
Creation Date:	5/24/2016 16:38:09
Receipt Date:	20151023
Manifest ID:	009104432JJK
Trans EPA ID:	NED986382133
Trans Name:	SMITH SYSTEMS INC
Trans 2 EPA ID:	Not reported
Trans 2 Name:	Not reported
TSDF EPA ID:	OKD000402396
Trans Name:	EQ OKLAHOMA INC
TSDF Alt EPA ID:	Not reported
TSDF Alt Name:	Not reported
Waste Code Description:	331 - Off-specification, aged, or surplus organics
RCRA Code:	D039
Meth Code:	H141 - Storage, Bulking, And/Or Transfer Off Site--No Treatment/Reovery (H010-H129) Or (H131-H135)
Quantity Tons:	0.0015
Waste Quantity:	3
Quantity Unit:	P
Additional Code 1:	D035
Additional Code 2:	D001
Additional Code 3:	Not reported
Additional Code 4:	Not reported
Additional Code 5:	Not reported
Shipment Date:	20150916
Creation Date:	5/24/2016 16:38:09
Receipt Date:	20151023
Manifest ID:	009104432JJK
Trans EPA ID:	NED986382133

WEST MARINE #1299 (Continued) **S118937850**

Trans Name:	SMITH SYSTEMS INC
Trans 2 EPA ID:	Not reported
Trans 2 Name:	Not reported
TSDF EPA ID:	OKD000402396
Trans Name:	EQ OKLAHOMA INC
TSDF Alt EPA ID:	Not reported
TSDF Alt Name:	Not reported
Waste Code Description:	331 - Off-specification, aged, or surplus organics
RCRA Code:	U159
Meth Code:	H141 - Storage, Bulking, And/Or Transfer Off Site--No Treatment/Reovery (H010-H129) Or (H131-H135)
Quantity Tons:	0.0225
Waste Quantity:	45
Quantity Unit:	P
Additional Code 1:	U154
Additional Code 2:	U002
Additional Code 3:	D004
Additional Code 4:	D001
Additional Code 5:	Not reported
Shipment Date:	20150916
Creation Date:	5/24/2016 16:38:09
Receipt Date:	20151023
Manifest ID:	009104432JJK
Trans EPA ID:	NED986382133
Trans Name:	SMITH SYSTEMS INC
Trans 2 EPA ID:	Not reported
Trans 2 Name:	Not reported
TSDF EPA ID:	OKD000402396
Trans Name:	EQ OKLAHOMA INC
TSDF Alt EPA ID:	Not reported
TSDF Alt Name:	Not reported
Waste Code Description:	131 - Aqueous solution (2 < pH < 12.5) containing reactive anions (azide, bromate, chlorate, cyanide, fluoride, hypochlorite, nitrite, perchlorate, and sulfide anions
RCRA Code:	D001
Meth Code:	H141 - Storage, Bulking, And/Or Transfer Off Site--No Treatment/Reovery (H010-H129) Or (H131-H135)
Quantity Tons:	0.0045
Waste Quantity:	9
Quantity Unit:	P
Additional Code 1:	Not reported
Additional Code 2:	Not reported
Additional Code 3:	Not reported
Additional Code 4:	Not reported
Additional Code 5:	Not reported
Shipment Date:	20150916
Creation Date:	Not reported
Receipt Date:	Not reported
Manifest ID:	009104432JJK
Trans EPA ID:	NED986382133
Trans Name:	SMITH SYSTEMS INC
Trans 2 EPA ID:	Not reported
Trans 2 Name:	Not reported
TSDF EPA ID:	OKD000402396
Trans Name:	EQ OKLAHOMA INC

WEST MARINE #1299 (Continued) **S118937850**

TSDF Alt EPA ID:	Not reported
TSDF Alt Name:	Not reported
Waste Code Description:	121 - Alkaline solution (pH >12.5) with metals (antimony, arsenic, barium, beryllium, cadmium, chromium, cobalt, copper, lead, mercury, molybdenum, nickel, selenium, silver, thallium, vanadium, and zinc
RCRA Code:	D002
Meth Code:	H141 - Storage, Bulking, And/Or Transfer Off Site--No Treatment/Reovery (H010-H129) Or (H131-H135)
Quantity Tons:	0.0125
Waste Quantity:	25
Quantity Unit:	P
Additional Code 1:	Not reported
Additional Code 2:	Not reported
Additional Code 3:	Not reported
Additional Code 4:	Not reported
Additional Code 5:	Not reported
Shipment Date:	20150916
Creation Date:	Not reported
Receipt Date:	Not reported
Manifest ID:	009104432JJK
Trans EPA ID:	NED986382133
Trans Name:	SMITH SYSTEMS INC
Trans 2 EPA ID:	Not reported
Trans 2 Name:	Not reported
TSDF EPA ID:	OKD000402396
Trans Name:	EQ OKLAHOMA INC
TSDF Alt EPA ID:	Not reported
TSDF Alt Name:	Not reported
Waste Code Description:	331 - Off-specification, aged, or surplus organics
RCRA Code:	D001
Meth Code:	H141 - Storage, Bulking, And/Or Transfer Off Site--No Treatment/Reovery (H010-H129) Or (H131-H135)
Quantity Tons:	0.0015
Waste Quantity:	3
Quantity Unit:	P
Additional Code 1:	Not reported
Additional Code 2:	Not reported
Additional Code 3:	Not reported
Additional Code 4:	Not reported
Additional Code 5:	Not reported
Shipment Date:	20150916
Creation Date:	Not reported
Receipt Date:	Not reported
Manifest ID:	009104432JJK
Trans EPA ID:	NED986382133
Trans Name:	SMITH SYSTEMS INC
Trans 2 EPA ID:	Not reported
Trans 2 Name:	Not reported
TSDF EPA ID:	OKD000402396
Trans Name:	EQ OKLAHOMA INC
TSDF Alt EPA ID:	Not reported
TSDF Alt Name:	Not reported
Waste Code Description:	- Not reported
RCRA Code:	Not reported
Meth Code:	H141 - Storage, Bulking, And/Or Transfer Off Site--No

WEST MARINE #1299 (Continued) **S118937850**

	Treatment/Reovery (H010-H129) Or (H131-H135)
Quantity Tons:	0.0025
Waste Quantity:	5
Quantity Unit:	P
Additional Code 1:	Not reported
Additional Code 2:	Not reported
Additional Code 3:	Not reported
Additional Code 4:	Not reported
Additional Code 5:	Not reported
Shipment Date:	20150916
Creation Date:	Not reported
Receipt Date:	Not reported
Manifest ID:	009104432JJK
Trans EPA ID:	NED986382133
Trans Name:	SMITH SYSTEMS INC
Trans 2 EPA ID:	Not reported
Trans 2 Name:	Not reported
TSDF EPA ID:	OKD000402396
Trans Name:	EQ OKLAHOMA INC
TSDF Alt EPA ID:	Not reported
TSDF Alt Name:	Not reported
Waste Code Description:	181 - Other inorganic solid waste Organics
RCRA Code:	Not reported
Meth Code:	- Not reported
Quantity Tons:	0.005
Waste Quantity:	10
Quantity Unit:	P
Additional Code 1:	Not reported
Additional Code 2:	Not reported
Additional Code 3:	Not reported
Additional Code 4:	Not reported
Additional Code 5:	Not reported
Shipment Date:	20150916
Creation Date:	Not reported
Receipt Date:	Not reported
Manifest ID:	009104432JJK
Trans EPA ID:	NED986382133
Trans Name:	SMITH SYSTEMS INC
Trans 2 EPA ID:	Not reported
Trans 2 Name:	Not reported
TSDF EPA ID:	OKD000402396
Trans Name:	EQ OKLAHOMA INC
TSDF Alt EPA ID:	Not reported
TSDF Alt Name:	Not reported
Waste Code Description:	181 - Other inorganic solid waste Organics
RCRA Code:	Not reported
Meth Code:	H141 - Storage, Bulking, And/Or Transfer Off Site--No Treatment/Reovery (H010-H129) Or (H131-H135)
Quantity Tons:	0.002
Waste Quantity:	4
Quantity Unit:	P
Additional Code 1:	Not reported
Additional Code 2:	Not reported
Additional Code 3:	Not reported
Additional Code 4:	Not reported

WEST MARINE #1299 (Continued) **S118937850**

Additional Code 5:	Not reported
Shipment Date:	20150916
Creation Date:	Not reported
Receipt Date:	Not reported
Manifest ID:	009104432JJK
Trans EPA ID:	NED986382133
Trans Name:	SMITH SYSTEMS INC
Trans 2 EPA ID:	Not reported
Trans 2 Name:	Not reported
TSDF EPA ID:	OKD000402396
Trans Name:	EQ OKLAHOMA INC
TSDF Alt EPA ID:	Not reported
TSDF Alt Name:	Not reported
Waste Code Description:	- Not reported
RCRA Code:	Not reported
Meth Code:	- Not reported
Quantity Tons:	0.0015
Waste Quantity:	3
Quantity Unit:	P
Additional Code 1:	Not reported
Additional Code 2:	Not reported
Additional Code 3:	Not reported
Additional Code 4:	Not reported
Additional Code 5:	Not reported

Additional Info:

Year:	2015
Gen EPA ID:	CAL000398601
Shipment Date:	20150916
Creation Date:	5/24/2016 16:38:09
Receipt Date:	20151023
Manifest ID:	009104432JJK
Trans EPA ID:	NED986382133
Trans Name:	SMITH SYSTEMS INC
Trans 2 EPA ID:	Not reported
Trans 2 Name:	Not reported
TSDF EPA ID:	OKD000402396
Trans Name:	EQ OKLAHOMA INC
TSDF Alt EPA ID:	Not reported
TSDF Alt Name:	Not reported
Waste Code Description:	331 - Off-specification, aged, or surplus organics
RCRA Code:	U159
Meth Code:	H141 - Storage, Bulking, And/Or Transfer Off Site--No Treatment/Reovery (H010-H129) Or (H131-H135)
Quantity Tons:	0.0075
Waste Quantity:	15
Quantity Unit:	P
Additional Code 1:	U154
Additional Code 2:	U002
Additional Code 3:	D004
Additional Code 4:	D001
Additional Code 5:	Not reported
Shipment Date:	20150916
Creation Date:	5/24/2016 16:38:09

WEST MARINE #1299 (Continued) **S118937850**

Receipt Date:	20151023
Manifest ID:	009104432JJK
Trans EPA ID:	NED986382133
Trans Name:	SMITH SYSTEMS INC
Trans 2 EPA ID:	Not reported
Trans 2 Name:	Not reported
TSDF EPA ID:	OKD000402396
Trans Name:	EQ OKLAHOMA INC
TSDF Alt EPA ID:	Not reported
TSDF Alt Name:	Not reported
Waste Code Description:	331 - Off-specification, aged, or surplus organics
RCRA Code:	D039
Meth Code:	H141 - Storage, Bulking, And/Or Transfer Off Site--No Treatment/Reovery (H010-H129) Or (H131-H135)
Quantity Tons:	0.0015
Waste Quantity:	3
Quantity Unit:	P
Additional Code 1:	D035
Additional Code 2:	D001
Additional Code 3:	Not reported
Additional Code 4:	Not reported
Additional Code 5:	Not reported

Shipment Date:	20150916
Creation Date:	5/24/2016 16:38:09
Receipt Date:	20151023
Manifest ID:	009104432JJK
Trans EPA ID:	NED986382133
Trans Name:	SMITH SYSTEMS INC
Trans 2 EPA ID:	Not reported
Trans 2 Name:	Not reported
TSDF EPA ID:	OKD000402396
Trans Name:	EQ OKLAHOMA INC
TSDF Alt EPA ID:	Not reported
TSDF Alt Name:	Not reported
Waste Code Description:	331 - Off-specification, aged, or surplus organics
RCRA Code:	U159
Meth Code:	H141 - Storage, Bulking, And/Or Transfer Off Site--No Treatment/Reovery (H010-H129) Or (H131-H135)
Quantity Tons:	0.0225
Waste Quantity:	45
Quantity Unit:	P
Additional Code 1:	U154
Additional Code 2:	U002
Additional Code 3:	D004
Additional Code 4:	D001
Additional Code 5:	Not reported

Shipment Date:	20150916
Creation Date:	5/24/2016 16:38:09
Receipt Date:	20151023
Manifest ID:	009104432JJK
Trans EPA ID:	NED986382133
Trans Name:	SMITH SYSTEMS INC
Trans 2 EPA ID:	Not reported
Trans 2 Name:	Not reported
TSDF EPA ID:	OKD000402396

WEST MARINE #1299 (Continued) **S118937850**

Trans Name:	EQ OKLAHOMA INC
TSDF Alt EPA ID:	Not reported
TSDF Alt Name:	Not reported
Waste Code Description:	131 - Aqueous solution (2 < pH < 12.5) containing reactive anions (azide, bromate, chlorate, cyanide, fluoride, hypochlorite, nitrite, perchlorate, and sulfide anions
RCRA Code:	D001
Meth Code:	H141 - Storage, Bulking, And/Or Transfer Off Site--No Treatment/Reovery (H010-H129) Or (H131-H135)
Quantity Tons:	0.0045
Waste Quantity:	9
Quantity Unit:	P
Additional Code 1:	Not reported
Additional Code 2:	Not reported
Additional Code 3:	Not reported
Additional Code 4:	Not reported
Additional Code 5:	Not reported
Shipment Date:	20150916
Creation Date:	Not reported
Receipt Date:	Not reported
Manifest ID:	009104432JJK
Trans EPA ID:	NED986382133
Trans Name:	SMITH SYSTEMS INC
Trans 2 EPA ID:	Not reported
Trans 2 Name:	Not reported
TSDF EPA ID:	OKD000402396
Trans Name:	EQ OKLAHOMA INC
TSDF Alt EPA ID:	Not reported
TSDF Alt Name:	Not reported
Waste Code Description:	121 - Alkaline solution (pH >12.5) with metals (antimony, arsenic, barium, beryllium, cadmium, chromium, cobalt, copper, lead, mercury, molybdenum, nickel, selenium, silver, thallium, vanadium, and zinc
RCRA Code:	D002
Meth Code:	H141 - Storage, Bulking, And/Or Transfer Off Site--No Treatment/Reovery (H010-H129) Or (H131-H135)
Quantity Tons:	0.0125
Waste Quantity:	25
Quantity Unit:	P
Additional Code 1:	Not reported
Additional Code 2:	Not reported
Additional Code 3:	Not reported
Additional Code 4:	Not reported
Additional Code 5:	Not reported
Shipment Date:	20150916
Creation Date:	Not reported
Receipt Date:	Not reported
Manifest ID:	009104432JJK
Trans EPA ID:	NED986382133
Trans Name:	SMITH SYSTEMS INC
Trans 2 EPA ID:	Not reported
Trans 2 Name:	Not reported
TSDF EPA ID:	OKD000402396
Trans Name:	EQ OKLAHOMA INC
TSDF Alt EPA ID:	Not reported
TSDF Alt Name:	Not reported

WEST MARINE #1299 (Continued) **S118937850**

Waste Code Description:	331 - Off-specification, aged, or surplus organics
RCRA Code:	D001
Meth Code:	H141 - Storage, Bulking, And/Or Transfer Off Site--No Treatment/Reovery (H010-H129) Or (H131-H135)
Quantity Tons:	0.0015
Waste Quantity:	3
Quantity Unit:	P
Additional Code 1:	Not reported
Additional Code 2:	Not reported
Additional Code 3:	Not reported
Additional Code 4:	Not reported
Additional Code 5:	Not reported
Shipment Date:	20150916
Creation Date:	Not reported
Receipt Date:	Not reported
Manifest ID:	009104432JJK
Trans EPA ID:	NED986382133
Trans Name:	SMITH SYSTEMS INC
Trans 2 EPA ID:	Not reported
Trans 2 Name:	Not reported
TSDF EPA ID:	OKD000402396
Trans Name:	EQ OKLAHOMA INC
TSDF Alt EPA ID:	Not reported
TSDF Alt Name:	Not reported
Waste Code Description:	- Not reported
RCRA Code:	Not reported
Meth Code:	H141 - Storage, Bulking, And/Or Transfer Off Site--No Treatment/Reovery (H010-H129) Or (H131-H135)
Quantity Tons:	0.0025
Waste Quantity:	5
Quantity Unit:	P
Additional Code 1:	Not reported
Additional Code 2:	Not reported
Additional Code 3:	Not reported
Additional Code 4:	Not reported
Additional Code 5:	Not reported
Shipment Date:	20150916
Creation Date:	Not reported
Receipt Date:	Not reported
Manifest ID:	009104432JJK
Trans EPA ID:	NED986382133
Trans Name:	SMITH SYSTEMS INC
Trans 2 EPA ID:	Not reported
Trans 2 Name:	Not reported
TSDF EPA ID:	OKD000402396
Trans Name:	EQ OKLAHOMA INC
TSDF Alt EPA ID:	Not reported
TSDF Alt Name:	Not reported
Waste Code Description:	181 - Other inorganic solid waste Organics
RCRA Code:	Not reported
Meth Code:	- Not reported
Quantity Tons:	0.005
Waste Quantity:	10
Quantity Unit:	P
Additional Code 1:	Not reported

WEST MARINE #1299 (Continued) **S118937850**

Additional Code 2:	Not reported
Additional Code 3:	Not reported
Additional Code 4:	Not reported
Additional Code 5:	Not reported
Shipment Date:	20150916
Creation Date:	Not reported
Receipt Date:	Not reported
Manifest ID:	009104432JJK
Trans EPA ID:	NED986382133
Trans Name:	SMITH SYSTEMS INC
Trans 2 EPA ID:	Not reported
Trans 2 Name:	Not reported
TSDF EPA ID:	OKD000402396
Trans Name:	EQ OKLAHOMA INC
TSDF Alt EPA ID:	Not reported
TSDF Alt Name:	Not reported
Waste Code Description:	181 - Other inorganic solid waste Organics
RCRA Code:	Not reported
Meth Code:	H141 - Storage, Bulking, And/Or Transfer Off Site--No Treatment/Reovery (H010-H129) Or (H131-H135)
Quantity Tons:	0.002
Waste Quantity:	4
Quantity Unit:	P
Additional Code 1:	Not reported
Additional Code 2:	Not reported
Additional Code 3:	Not reported
Additional Code 4:	Not reported
Additional Code 5:	Not reported
Shipment Date:	20150916
Creation Date:	Not reported
Receipt Date:	Not reported
Manifest ID:	009104432JJK
Trans EPA ID:	NED986382133
Trans Name:	SMITH SYSTEMS INC
Trans 2 EPA ID:	Not reported
Trans 2 Name:	Not reported
TSDF EPA ID:	OKD000402396
Trans Name:	EQ OKLAHOMA INC
TSDF Alt EPA ID:	Not reported
TSDF Alt Name:	Not reported
Waste Code Description:	- Not reported
RCRA Code:	Not reported
Meth Code:	- Not reported
Quantity Tons:	0.0015
Waste Quantity:	3
Quantity Unit:	P
Additional Code 1:	Not reported
Additional Code 2:	Not reported
Additional Code 3:	Not reported
Additional Code 4:	Not reported
Additional Code 5:	Not reported

HWTS:

Name:	WEST MARINE #1299
Address:	192 DONAHUE ST

WEST MARINE #1299 (Continued) **S118937850**

Address 2:	Not reported
City,State,Zip:	SAUSALITO, CA 94964
EPA ID:	CAL000398601
Inactive Date:	Not reported
Create Date:	07/14/2014
Last Act Date:	Not reported
Mailing Name:	Not reported
Mailing Address:	500 WESTRIDGE DR
Mailing Address 2:	Not reported
Mailing City,State,Zip:	WATSONVILLE, CA 950760000
Owner Name:	WEST MARINE PRODUCTS INC
Owner Address:	500 WESTRIDGE DR
Owner Address 2:	Not reported
Owner City,State,Zip:	WATSONVILLE, CA 95076
Contact Name:	DAVID GOUPIL
Contact Address:	500 WESTRIDGE DRIVE
Contact Address 2:	Not reported
City,State,Zip:	WATSONVILLE, CA 95076
Facility Status:	Active
Facility Type:	PERMANENT
Category:	STATE
Latitude:	37.872432
Longitude:	-122.5092465

NAICS:

EPA ID:	CAL000398601
Create Date:	2014-07-14 08:37:38.017
NAICS Code:	42295
NAICS Description:	Paint, Varnish, and Supplies Wholesalers
Issued EPA ID Date:	2014-07-14 08:37:37.99300
Inactive Date:	Not reported
Facility Name:	WEST MARINE #1299
Facility Address:	192 DONAHUE ST
Facility Address 2:	Not reported
Facility City:	SAUSALITO
Facility County:	Not reported
Facility State:	CA
Facility Zip:	94964

EPA ID:	CAL000398601
Create Date:	2016-03-28 14:38:50.923
NAICS Code:	441222
NAICS Description:	Boat Dealers
Issued EPA ID Date:	2014-07-14 08:37:37.99300
Inactive Date:	Not reported
Facility Name:	WEST MARINE #1299
Facility Address:	192 DONAHUE ST
Facility Address 2:	Not reported
Facility City:	SAUSALITO
Facility County:	Not reported
Facility State:	CA
Facility Zip:	94964

D15 **WEST MARINE #1299** **RCRA NonGen / NLR** **1024845442**
ESE **192 DONAHUE ST** **CAL000398601**
< 1/8 **SAUSALITO, CA 94964**
0.103 mi.
546 ft. **Site 2 of 6 in cluster D**

Relative: **Lower**
Actual: **29 ft.**

RCRA Listings:

Date Form Received by Agency:		20140714
Handler Name:	WEST MARINE #1299	
Handler Address:		192 DONAHUE ST
Handler City,State,Zip:		SAUSALITO, CA 94964
EPA ID:		CAL000398601
Contact Name:		MARIA RIOS
Contact Address:		TAX DEPARTMENT
Contact City,State,Zip:		WATSONVILLE, CA 95076
Contact Telephone:		831-761-4925
Contact Fax:		831-768-5929
Contact Email:		MARIARI@WESTMARINE.COM
Contact Title:		Not reported
EPA Region:		09
Land Type:		Not reported
Federal Waste Generator Description:		Not a generator, verified
Non-Notifier:		Not reported
Biennial Report Cycle:		Not reported
Accessibility:		Not reported
Active Site Indicator:		Handler Activities
State District Owner:		Not reported
State District:		Not reported
Mailing Address:		500 WESTRIDGE DR MS-G4
Mailing City,State,Zip:		WATSONVILLE, CA 95076-0000
Owner Name:	WEST MARINE PRODUCTS INC	
Owner Type:		Other
Operator Name:	MARIA RIOS	
Operator Type:		Other
Short-Term Generator Activity:		No
Importer Activity:		No
Mixed Waste Generator:		No
Transporter Activity:		No
Transfer Facility Activity:		No
Recycler Activity with Storage:		No
Small Quantity On-Site Burner Exemption:		No
Smelting Melting and Refining Furnace Exemption:		No
Underground Injection Control:		No
Off-Site Waste Receipt:		No
Universal Waste Indicator:		Yes
Universal Waste Destination Facility:		Yes
Federal Universal Waste:		No
Active Site Fed-Reg Treatment Storage and Disposal Facility:		Not reported
Active Site Converter Treatment storage and Disposal Facility:		Not reported
Active Site State-Reg Treatment Storage and Disposal Facility:		Not reported
Active Site State-Reg Handler:		---
Federal Facility Indicator:		Not reported
Hazardous Secondary Material Indicator:		N
Sub-Part K Indicator:		Not reported
Commercial TSD Indicator:		No
Treatment Storage and Disposal Type:		Not reported
2018 GPRA Permit Baseline:		Not on the Baseline
2018 GPRA Renewals Baseline:		Not on the Baseline
Permit Renewals Workload Universe:		Not reported

WEST MARINE #1299 (Continued) **1024845442**

Permit Workload Universe:	Not reported
Permit Progress Universe:	Not reported
Post-Closure Workload Universe:	Not reported
Closure Workload Universe:	Not reported
202 GPRA Corrective Action Baseline:	No
Corrective Action Workload Universe:	No
Subject to Corrective Action Universe:	No
Non-TSDFs Where RCRA CA has Been Imposed Universe:	No
TSDFs Potentially Subject to CA Under 3004 (u)/(v) Universe:	No
TSDFs Only Subject to CA under Discretionary Auth Universe:	No
Corrective Action Priority Ranking:	No NCAPS ranking
Environmental Control Indicator:	No
Institutional Control Indicator:	No
Human Exposure Controls Indicator:	N/A
Groundwater Controls Indicator:	N/A
Operating TSDF Universe:	Not reported
Full Enforcement Universe:	Not reported
Significant Non-Complier Universe:	No
Unaddressed Significant Non-Complier Universe:	No
Addressed Significant Non-Complier Universe:	No
Significant Non-Complier With a Compliance Schedule Universe:	No
Financial Assurance Required: Not reported	
Handler Date of Last Change:	20180906
Recognized Trader-Importer:	No
Recognized Trader-Exporter:	No
Importer of Spent Lead Acid Batteries:	No
Exporter of Spent Lead Acid Batteries:	No
Recycler Activity Without Storage:	No
Manifest Broker:	No
Sub-Part P Indicator:	No

Handler - Owner Operator:

Owner/Operator Indicator:	Owner
Owner/Operator Name: WEST MARINE PRODUCTS INC	
Legal Status:	Other
Date Became Current:	Not reported
Date Ended Current:	Not reported
Owner/Operator Address:	500 WESTRIDGE DR
Owner/Operator City,State,Zip:	WATSONVILLE, CA 95076-0000
Owner/Operator Telephone:	831-761-4925
Owner/Operator Telephone Ext:	Not reported
Owner/Operator Fax:	Not reported
Owner/Operator Email:	Not reported

Owner/Operator Indicator:	Operator
Owner/Operator Name: MARIA RIOS	
Legal Status:	Other
Date Became Current:	Not reported
Date Ended Current:	Not reported
Owner/Operator Address:	TAX DEPARTMENT
Owner/Operator City,State,Zip:	WATSONVILLE, CA 95076
Owner/Operator Telephone:	831-761-4925
Owner/Operator Telephone Ext:	Not reported
Owner/Operator Fax:	Not reported
Owner/Operator Email:	Not reported

WEST MARINE #1299 (Continued) **1024845442**

Historic Generators:
Receive Date: 20140714
Handler Name: WEST MARINE #1299
Federal Waste Generator Description: Not a generator, verified
State District Owner: Not reported
Large Quantity Handler of Universal Waste: No
Recognized Trader Importer: No
Recognized Trader Exporter: No
Spent Lead Acid Battery Importer: No
Spent Lead Acid Battery Exporter: No
Current Record: Yes
Non Storage Recycler Activity: Not reported
Electronic Manifest Broker: Not reported

List of NAICS Codes and Descriptions:
NAICS Code: 42295
NAICS Description: PAINT, VARNISH, AND SUPPLIES WHOLESALERS

NAICS Code: 441222
NAICS Description: BOAT DEALERS

Facility Has Received Notices of Violations:
Violations: No Violations Found

Evaluation Action Summary:
Evaluations: No Evaluations Found

C16 **JOHN COLLINS** **RCRA NonGen / NLR** **1026822372**
SW **74 BUCKELEW STREET** **CAC003135332**
< 1/8 **SAUSALITO, CA 94965**
0.109 mi.
574 ft. **Site 3 of 3 in cluster C**

Relative:
Lower

Actual:
48 ft.

RCRA Listings:
Date Form Received by Agency: 20210820
Handler Name: JOHN COLLINS
Handler Address: 74 BUCKELEW STREET
Handler City,State,Zip: SAUSALITO, CA 94965
EPA ID: CAC003135332
Contact Name: JOHN COLLINS
Contact Address: 74 BUCKELEW STREET
Contact City,State,Zip: SAUSALITO, CA 94965
Contact Telephone: 415-850-3283
Contact Fax: Not reported
Contact Email: GISELLE.ESPIRITU@SYNERGYCOMPANIES.ORG
Contact Title: Not reported
EPA Region: 09
Land Type: Not reported
Federal Waste Generator Description: Not a generator, verified
Non-Notifier: Not reported
Biennial Report Cycle: Not reported
Accessibility: Not reported
Active Site Indicator: Not reported
State District Owner: Not reported
State District: Not reported

JOHN COLLINS (Continued) **1026822372**

Mailing Address:		74 BUCKELEW STREET
Mailing City,State,Zip:		SAUSALITO, CA 94965
Owner Name:	JOHN COLLINS	
Owner Type:		Other
Operator Name:	JOHN COLLINS	
Operator Type:		Other
Short-Term Generator Activity:		No
Importer Activity:		No
Mixed Waste Generator:		No
Transporter Activity:		No
Transfer Facility Activity:		No
Recycler Activity with Storage:		No
Small Quantity On-Site Burner Exemption:		No
Smelting Melting and Refining Furnace Exemption:		No
Underground Injection Control:		No
Off-Site Waste Receipt:		No
Universal Waste Indicator:		No
Universal Waste Destination Facility:		No
Federal Universal Waste:		No
Active Site Fed-Reg Treatment Storage and Disposal Facility:		Not reported
Active Site Converter Treatment storage and Disposal Facility:		Not reported
Active Site State-Reg Treatment Storage and Disposal Facility:		Not reported
Active Site State-Reg Handler:		---
Federal Facility Indicator:		Not reported
Hazardous Secondary Material Indicator:		N
Sub-Part K Indicator:		Not reported
Commercial TSD Indicator:		No
Treatment Storage and Disposal Type:		Not reported
2018 GPRA Permit Baseline:		Not on the Baseline
2018 GPRA Renewals Baseline:		Not on the Baseline
Permit Renewals Workload Universe:		Not reported
Permit Workload Universe:		Not reported
Permit Progress Universe:		Not reported
Post-Closure Workload Universe:		Not reported
Closure Workload Universe:		Not reported
202 GPRA Corrective Action Baseline:		No
Corrective Action Workload Universe:		No
Subject to Corrective Action Universe:		No
Non-TSDFs Where RCRA CA has Been Imposed Universe:		No
TSDFs Potentially Subject to CA Under 3004 (u)/(v) Universe:		No
TSDFs Only Subject to CA under Discretionary Auth Universe:		No
Corrective Action Priority Ranking:		No NCAPS ranking
Environmental Control Indicator:		No
Institutional Control Indicator:		No
Human Exposure Controls Indicator:		N/A
Groundwater Controls Indicator:		N/A
Operating TSDF Universe:		Not reported
Full Enforcement Universe:		Not reported
Significant Non-Complier Universe:		No
Unaddressed Significant Non-Complier Universe:		No
Addressed Significant Non-Complier Universe:		No
Significant Non-Complier With a Compliance Schedule Universe:		No
Financial Assurance Required:	Not reported	
Handler Date of Last Change:		20210820
Recognized Trader-Importer:		No
Recognized Trader-Exporter:		No
Importer of Spent Lead Acid Batteries:		No

JOHN COLLINS (Continued) **1026822372**

Exporter of Spent Lead Acid Batteries: No
Recycler Activity Without Storage: No
Manifest Broker: No
Sub-Part P Indicator: No

Handler - Owner Operator:
Owner/Operator Indicator: Operator
Owner/Operator Name: JOHN COLLINS
Legal Status: Other
Date Became Current: Not reported
Date Ended Current: Not reported
Owner/Operator Address: 74 BUCKELEW STREET
Owner/Operator City,State,Zip: SAUSALITO, CA 94965
Owner/Operator Telephone: 415-850-3283
Owner/Operator Telephone Ext: Not reported
Owner/Operator Fax: Not reported
Owner/Operator Email: Not reported

Owner/Operator Indicator: Owner
Owner/Operator Name: JOHN COLLINS
Legal Status: Other
Date Became Current: Not reported
Date Ended Current: Not reported
Owner/Operator Address: 74 BUCKELEW STREET
Owner/Operator City,State,Zip: SAUSALITO, CA 94965
Owner/Operator Telephone: 415-850-3283
Owner/Operator Telephone Ext: Not reported
Owner/Operator Fax: Not reported
Owner/Operator Email: Not reported

Historic Generators:
Receive Date: 20210820
Handler Name: JOHN COLLINS
Federal Waste Generator Description: Not a generator, verified
State District Owner: Not reported
Large Quantity Handler of Universal Waste: No
Recognized Trader Importer: No
Recognized Trader Exporter: No
Spent Lead Acid Battery Importer: No
Spent Lead Acid Battery Exporter: No
Current Record: Yes
Non Storage Recycler Activity: No
Electronic Manifest Broker: No

List of NAICS Codes and Descriptions:
NAICS Code: 56299
NAICS Description: ALL OTHER WASTE MANAGEMENT SERVICES

Facility Has Received Notices of Violations:
Violations: No Violations Found

Evaluation Action Summary:
Evaluations: No Evaluations Found

D17 **TARGET T3240** **CERS HAZ WASTE** **S121779790**
ESE **180 DONAHUE ST** **CERS** **N/A**
< 1/8 **SAUSALITO, CA 94965**
0.110 mi.
583 ft. **Site 3 of 6 in cluster D**

Relative:
Lower

Actual:
25 ft.

CERS HAZ WASTE:
Name: TARGET T3240
Address: 180 DONAHUE ST
City,State,Zip: SAUSALITO, CA 94965
Site ID: 417092
CERS ID: 10724995
CERS Description: Hazardous Waste Generator

CERS:
Name: TARGET T3240
Address: 180 DONAHUE ST
City,State,Zip: SAUSALITO, CA 94965
Site ID: 417092
CERS ID: 10724995
CERS Description: Chemical Storage Facilities

Violations:
Site ID: 417092
Site Name: Target T3240
Violation Date: 10-31-2017
Citation: HSC 6.5 25160(b)(1)(C) - California Health and Safety Code, Chapter 6.5, Section(s) 25160(b)(1)(C)
Violation Description: Failure to send a legible copy of each hazardous waste manifest to the Department within 30 days of each shipment of hazardous waste.
Violation Notes: Returned to compliance on 11/17/2017. Since changing hazardous waste hauler the manifests have not been sent to DTSC. Send manifests to DTSC within 30 days or by November 30, 2017.
Violation Division: Marin County Dept of Public Works, Waste Mgmt, CUP
Violation Program: HW
Violation Source: CERS,

Evaluation:
Eval General Type: Compliance Evaluation Inspection
Eval Date: 10-31-2017
Violations Found: Yes
Eval Type: Routine done by local agency
Eval Notes: Not reported
Eval Division: Marin County Dept of Public Works, Waste Mgmt, CUP
Eval Program: HW
Eval Source: CERS,

Eval General Type: Compliance Evaluation Inspection
Eval Date: 10-31-2017
Violations Found: No
Eval Type: Routine done by local agency
Eval Notes: Not reported
Eval Division: Marin County Dept of Public Works, Waste Mgmt, CUP
Eval Program: HMRRP
Eval Source: CERS,

Affiliation:
Affiliation Type Desc: Environmental Contact

TARGET T3240 (Continued) **S121779790**

Entity Name:	Environmental Compliance
Entity Title:	Not reported
Affiliation Address:	PO Box 111
Affiliation City:	Minneapolis
Affiliation State:	MN
Affiliation Country:	Not reported
Affiliation Zip:	55440
Affiliation Phone:	,
Affiliation Type Desc:	Facility Mailing Address
Entity Name:	Mailing Address
Entity Title:	Not reported
Affiliation Address:	PO Box 111
Affiliation City:	Minneapolis
Affiliation State:	MN
Affiliation Country:	Not reported
Affiliation Zip:	55440
Affiliation Phone:	,
Affiliation Type Desc:	Operator
Entity Name:	Target Corporation
Entity Title:	Not reported
Affiliation Address:	Not reported
Affiliation City:	Not reported
Affiliation State:	Not reported
Affiliation Country:	Not reported
Affiliation Zip:	Not reported
Affiliation Phone:	(800) 587-2228,
Affiliation Type Desc:	Document Preparer
Entity Name:	Nathan White
Entity Title:	Not reported
Affiliation Address:	Not reported
Affiliation City:	Not reported
Affiliation State:	Not reported
Affiliation Country:	Not reported
Affiliation Zip:	Not reported
Affiliation Phone:	,
Affiliation Type Desc:	CUPA District
Entity Name:	Marin County CUPA
Entity Title:	Not reported
Affiliation Address:	1600 Los GamosSuite 210
Affiliation City:	San Rafael
Affiliation State:	CA
Affiliation Country:	Not reported
Affiliation Zip:	94903
Affiliation Phone:	(415) 473-6647,
Affiliation Type Desc:	Identification Signer
Entity Name:	Steve Musser
Entity Title:	Sr. Compliance Director
Affiliation Address:	Not reported
Affiliation City:	Not reported
Affiliation State:	Not reported
Affiliation Country:	Not reported
Affiliation Zip:	Not reported

TARGET T3240 (Continued) **S121779790**

Affiliation Phone: ,

Affiliation Type Desc: Legal Owner
Entity Name: Target Corporation
Entity Title: Not reported
Affiliation Address: PO Box 111
Affiliation City: Minneapolis
Affiliation State: MN
Affiliation Country: United States
Affiliation Zip: 55440
Affiliation Phone: (800) 587-2228,

Affiliation Type Desc: Parent Corporation
Entity Name: Target Corporate Office Headquarters
Entity Title: Not reported
Affiliation Address: Not reported
Affiliation City: Not reported
Affiliation State: Not reported
Affiliation Country: Not reported
Affiliation Zip: Not reported
Affiliation Phone: ,

D18 **CVS PHARMACY #17694** **RCRA-VSQG** **1023675224**
ESE **180 DONAHUE ST STE B** **CAR000272377**
< 1/8 **SAUSALITO, CA 94965**
0.110 mi.
583 ft. **Site 4 of 6 in cluster D**

Relative: **Lower**

Actual: **25 ft.**

RCRA Listings:
Date Form Received by Agency: 20170426
Handler Name: CVS PHARMACY #17694
Handler Address: 180 DONAHUE ST STE B
Handler City,State,Zip: SAUSALITO, CA 94965
EPA ID: CAR000272377
Contact Name: NICOLE WILKINSON
Contact Address: ONE CVS DRIVE
Contact City,State,Zip: WOONSOCKET, RI 02895
Contact Telephone: 401-770-7132
Contact Fax: Not reported
Contact Email: NICOLE.WILKINSON@CVSHEALTH.COM
Contact Title: DIRECTOR CORPORATE ENVIRONMENTAL
EPA Region: 09
Land Type: Private
Federal Waste Generator Description: Conditionally Exempt Small Quantity Generator
Non-Notifier: Not reported
Biennial Report Cycle: Not reported
Accessibility: Not reported
Active Site Indicator: Handler Activities
State District Owner: Not reported
State District: Not reported
Mailing Address: ONE CVS DRIVE
Mailing City,State,Zip: WOONSOCKET, RI 02895
Owner Name: TARGET CORPORATION
Owner Type: Private
Operator Name: GARFIELD BEACH CVS LLC
Operator Type: Private
Short-Term Generator Activity: No

CVS PHARMACY #17694 (Continued) **1023675224**

Importer Activity:	No
Mixed Waste Generator:	No
Transporter Activity:	No
Transfer Facility Activity:	No
Recycler Activity with Storage:	No
Small Quantity On-Site Burner Exemption:	No
Smelting Melting and Refining Furnace Exemption:	No
Underground Injection Control:	No
Off-Site Waste Receipt:	No
Universal Waste Indicator:	No
Universal Waste Destination Facility:	No
Federal Universal Waste:	No
Active Site Fed-Reg Treatment Storage and Disposal Facility:	Not reported
Active Site Converter Treatment storage and Disposal Facility:	Not reported
Active Site State-Reg Treatment Storage and Disposal Facility:	Not reported
Active Site State-Reg Handler:	---
Federal Facility Indicator:	Not reported
Hazardous Secondary Material Indicator:	NN
Sub-Part K Indicator:	Not reported
Commercial TSD Indicator:	No
Treatment Storage and Disposal Type:	Not reported
2018 GPRA Permit Baseline:	Not on the Baseline
2018 GPRA Renewals Baseline:	Not on the Baseline
Permit Renewals Workload Universe:	Not reported
Permit Workload Universe:	Not reported
Permit Progress Universe:	Not reported
Post-Closure Workload Universe:	Not reported
Closure Workload Universe:	Not reported
202 GPRA Corrective Action Baseline:	No
Corrective Action Workload Universe:	No
Subject to Corrective Action Universe:	No
Non-TSDFs Where RCRA CA has Been Imposed Universe:	No
TSDFs Potentially Subject to CA Under 3004 (u)/(v) Universe:	No
TSDFs Only Subject to CA under Discretionary Auth Universe:	No
Corrective Action Priority Ranking:	No NCAPS ranking
Environmental Control Indicator:	No
Institutional Control Indicator:	No
Human Exposure Controls Indicator:	N/A
Groundwater Controls Indicator:	N/A
Operating TSDF Universe:	Not reported
Full Enforcement Universe:	Not reported
Significant Non-Complier Universe:	No
Unaddressed Significant Non-Complier Universe:	No
Addressed Significant Non-Complier Universe:	No
Significant Non-Complier With a Compliance Schedule Universe:	No
Financial Assurance Required: Not reported	
Handler Date of Last Change:	20170511
Recognized Trader-Importer:	No
Recognized Trader-Exporter:	No
Importer of Spent Lead Acid Batteries:	No
Exporter of Spent Lead Acid Batteries:	No
Recycler Activity Without Storage:	Not reported
Manifest Broker:	Not reported
Sub-Part P Indicator:	No

CVS PHARMACY #17694 (Continued) **1023675224**

Hazardous Waste Summary:

Waste Code:	D001
Waste Description:	IGNITABLE WASTE
Waste Code:	D002
Waste Description:	CORROSIVE WASTE
Waste Code:	D007
Waste Description:	CHROMIUM
Waste Code:	D009
Waste Description:	MERCURY
Waste Code:	D010
Waste Description:	SELENIUM
Waste Code:	D011
Waste Description:	SILVER
Waste Code:	D024
Waste Description:	M-CRESOL
Waste Code:	P001
Waste Description:	2H-1-BENZOPYRAN-2-ONE, 4-HYDROXY-3-(3-OXO-1-PHENYLBUTYL)-, & SALTS, WHEN PRESENT AT CONCENTRATIONS GREATER THAN 0.3% (OR) WARFARIN, & SALTS, WHEN PRESENT AT CONCENTRATIONS GREATER THAN 0.3%
Waste Code:	U034
Waste Description:	ACETALDEHYDE, TRICHLORO- (OR) CHLORAL
Waste Code:	U044
Waste Description:	CHLOROFORM (OR) METHANE, TRICHLORO-
Waste Code:	U122
Waste Description:	FORMALDEHYDE
Waste Code:	U129
Waste Description:	CYCLOHEXANE, 1,2,3,4,5,6-HEXACHLORO-, (1ALPHA, 2ALPHA, 3BETA, 4ALPHA, 5ALPHA, 6BETA)- (OR) LINDANE
Waste Code:	U188
Waste Description:	PHENOL
Waste Code:	U201
Waste Description:	1,3-BENZENEDIOL (OR) RESORCINOL
Waste Code:	U205
Waste Description:	SELENIUM SULFIDE (OR) SELENIUM SULFIDE SES2 (R,T)

Handler - Owner Operator:

Owner/Operator Indicator:	Owner
Owner/Operator Name:	TARGET CORPORATION
Legal Status:	Private
Date Became Current:	20170207
Date Ended Current:	Not reported
Owner/Operator Address:	1000 NICOLLET MALL

CVS PHARMACY #17694 (Continued) **1023675224**

Owner/Operator City,State,Zip: MINNEAPOLIS, MN 55403
Owner/Operator Telephone: 612-304-6073
Owner/Operator Telephone Ext: Not reported
Owner/Operator Fax: Not reported
Owner/Operator Email: Not reported

Owner/Operator Indicator: Operator
Owner/Operator Name: GARFIELD BEACH CVS LLC
Legal Status: Private
Date Became Current: 20170307
Date Ended Current: Not reported
Owner/Operator Address: Not reported
Owner/Operator City,State,Zip: Not reported
Owner/Operator Telephone: Not reported
Owner/Operator Telephone Ext: Not reported
Owner/Operator Fax: Not reported
Owner/Operator Email: Not reported

Historic Generators:
Receive Date: 20170426
Handler Name: CVS PHARMACY #17694
Federal Waste Generator Description: Conditionally Exempt Small Quantity Generator
State District Owner: Not reported
Large Quantity Handler of Universal Waste: No
Recognized Trader Importer: No
Recognized Trader Exporter: No
Spent Lead Acid Battery Importer: No
Spent Lead Acid Battery Exporter: No
Current Record: Yes
Non Storage Recycler Activity: Not reported
Electronic Manifest Broker: Not reported

List of NAICS Codes and Descriptions:
NAICS Code: 446110
NAICS Description: PHARMACIES AND DRUG STORES

Facility Has Received Notices of Violations:
Violations: No Violations Found

Evaluation Action Summary:
Evaluations: No Evaluations Found

D19 **TARGET STORE T3240** **RCRA-LQG** **1023675039**
ESE **180 DONAHUE STREET** **CAR000269704**
< 1/8 **SAUSALITO, CA 94965**
0.110 mi.
583 ft. **Site 5 of 6 in cluster D**

Relative: **Lower**
Actual: **25 ft.**

RCRA Listings:
Date Form Received by Agency: 20211217
Handler Name: TARGET STORE T3240
Handler Address: 180 DONAHUE STREET
Handler City,State,Zip: SAUSALITO, CA 94965
EPA ID: CAR000269704
Contact Name: STEVE MUSSER

TARGET STORE T3240 (Continued) **1023675039**

Contact Address:		PO BOX 111
Contact City,State,Zip:		MINNEAPOLIS, MN 55440
Contact Telephone:		800-587-2228
Contact Fax:		Not reported
Contact Email:		POC@TARGET.COM
Contact Title:		SR COMPLIANCE DIRECTOR
EPA Region:		09
Land Type:		Private
Federal Waste Generator Description:		Large Quantity Generator
Non-Notifier:		Not reported
Biennial Report Cycle:		Not reported
Accessibility:		Not reported
Active Site Indicator:		Handler Activities
State District Owner:		Not reported
State District:		Not reported
Mailing Address:		PO BOX 111
Mailing City,State,Zip:		MINNEAPOLIS, MN 55440
Owner Name:	MARIN GATEWAY GARP, LLC	
Owner Type:		Private
Operator Name:	TARGET CORPORATION	
Operator Type:		Private
Short-Term Generator Activity:		No
Importer Activity:		No
Mixed Waste Generator:		No
Transporter Activity:		No
Transfer Facility Activity:		No
Recycler Activity with Storage:		No
Small Quantity On-Site Burner Exemption:		No
Smelting Melting and Refining Furnace Exemption:		No
Underground Injection Control:		No
Off-Site Waste Receipt:		No
Universal Waste Indicator:		No
Universal Waste Destination Facility:		No
Federal Universal Waste:		No
Active Site Fed-Reg Treatment Storage and Disposal Facility:		Not reported
Active Site Converter Treatment storage and Disposal Facility:		Not reported
Active Site State-Reg Treatment Storage and Disposal Facility:		Not reported
Active Site State-Reg Handler:		---
Federal Facility Indicator:		Not reported
Hazardous Secondary Material Indicator:		N
Sub-Part K Indicator:		Not reported
Commercial TSD Indicator:		No
Treatment Storage and Disposal Type:		Not reported
2018 GPRA Permit Baseline:		Not on the Baseline
2018 GPRA Renewals Baseline:		Not on the Baseline
Permit Renewals Workload Universe:		Not reported
Permit Workload Universe:		Not reported
Permit Progress Universe:		Not reported
Post-Closure Workload Universe:		Not reported
Closure Workload Universe:		Not reported
202 GPRA Corrective Action Baseline:		No
Corrective Action Workload Universe:		No
Subject to Corrective Action Universe:		No
Non-TSDFs Where RCRA CA has Been Imposed Universe:		No
TSDFs Potentially Subject to CA Under 3004 (u)/(v) Universe:		No
TSDFs Only Subject to CA under Discretionary Auth Universe:		No
Corrective Action Priority Ranking:		No NCAPS ranking

TARGET STORE T3240 (Continued) **1023675039**

Environmental Control Indicator:	No
Institutional Control Indicator:	No
Human Exposure Controls Indicator:	N/A
Groundwater Controls Indicator:	N/A
Operating TSDF Universe:	Not reported
Full Enforcement Universe:	Not reported
Significant Non-Complier Universe:	No
Unaddressed Significant Non-Complier Universe:	No
Addressed Significant Non-Complier Universe:	No
Significant Non-Complier With a Compliance Schedule Universe:	No
Financial Assurance Required: Not reported	
Handler Date of Last Change:	20211221
Recognized Trader-Importer:	No
Recognized Trader-Exporter:	No
Importer of Spent Lead Acid Batteries:	No
Exporter of Spent Lead Acid Batteries:	No
Recycler Activity Without Storage:	No
Manifest Broker:	No
Sub-Part P Indicator:	No

Hazardous Waste Summary:

Waste Code:	D001
Waste Description:	IGNITABLE WASTE
Waste Code:	D002
Waste Description:	CORROSIVE WASTE
Waste Code:	D003
Waste Description:	REACTIVE WASTE
Waste Code:	D004
Waste Description:	ARSENIC
Waste Code:	D005
Waste Description:	BARIUM
Waste Code:	D006
Waste Description:	CADMIUM
Waste Code:	D007
Waste Description:	CHROMIUM
Waste Code:	D008
Waste Description:	LEAD
Waste Code:	D009
Waste Description:	MERCURY
Waste Code:	D010
Waste Description:	SELENIUM
Waste Code:	D011
Waste Description:	SILVER
Waste Code:	D016
Waste Description:	2,4-D (2,4-DICHLOROPHENOXYACETIC ACID)

TARGET STORE T3240 (Continued) **1023675039**

Waste Code: D018
Waste Description: BENZENE

Waste Code: D024
Waste Description: M-CRESOL

Waste Code: D026
Waste Description: CRESOL

Waste Code: D027
Waste Description: 1,4-DICHLOROBENZENE

Waste Code: D035
Waste Description: METHYL ETHYL KETONE

Waste Code: D039
Waste Description: TETRACHLOROETHYLENE

Waste Code: P075
Waste Description: NICOTINE, & SALTS (OR) PYRIDINE, 3-(1-METHYL-2-PYRROLIDINYL)-,(S)-, & SALTS

Waste Code: U002
Waste Description: 2-PROPANONE (I) (OR) ACETONE (I)

Waste Code: U035
Waste Description: BENZENEBUTANOIC ACID, 4-[BIS(2-CHLOROETHYL)AMINO]- (OR) CHLORAMBUCIL

Waste Code: U044
Waste Description: CHLOROFORM (OR) METHANE, TRICHLORO-

Waste Code: U058
Waste Description: 2H-1,3,2-OXAZAPHOSPHORIN-2-AMINE, N,N-BIS(2-CHLOROETHYL)TETRAHYDRO-, 2-OXIDE (OR) CYCLOPHOSPHAMIDE

Waste Code: U072
Waste Description: BENZENE, 1,4-DICHLORO- (OR) P-DICHLOROBENZENE

Waste Code: U129
Waste Description: CYCLOHEXANE, 1,2,3,4,5,6-HEXACHLORO-, (1ALPHA, 2ALPHA, 3BETA, 4ALPHA, 5ALPHA, 6BETA)- (OR) LINDANE

Waste Code: U134
Waste Description: HYDROFLUORIC ACID (C,T) (OR) HYDROGEN FLUORIDE (C,T)

Waste Code: U150
Waste Description: L-PHENYLALANINE, 4-[BIS(2-CHLOROETHYL)AMINO]- (OR) MELPHALAN

Waste Code: U154
Waste Description: METHANOL (I) (OR) METHYL ALCOHOL (I)

Waste Code: U188
Waste Description: PHENOL

Waste Code: U200
Waste Description: RESERPINE (OR) YOHIMBAN-16-CARBOXYLIC ACID, 11,17-DIMETHOXY-18-[(3,4,5-TRIMETHOXYBENZOYL)OXY]-, METHYL ESTER,

TARGET STORE T3240 (Continued) **1023675039**

(3BETA, 16BETA, 17ALPHA, 18BETA, 20ALPHA)-

Waste Code: U201
Waste Description: 1,3-BENZENEDIOL (OR) RESORCINOL

Waste Code: U279
Waste Description: U279

Handler - Owner Operator:
Owner/Operator Indicator: Operator
Owner/Operator Name: TARGET CORPORATION
Legal Status: Private
Date Became Current: 20170308
Date Ended Current: Not reported
Owner/Operator Address: PO BOX 111
Owner/Operator City,State,Zip: MINNEAPOLIS, MN 55440
Owner/Operator Telephone: 800-587-2228
Owner/Operator Telephone Ext: Not reported
Owner/Operator Fax: Not reported
Owner/Operator Email: POC@TARGET.COM

Owner/Operator Indicator: Owner
Owner/Operator Name: MARIN GATEWAY GARP, LLC
Legal Status: Private
Date Became Current: 20110215
Date Ended Current: Not reported
Owner/Operator Address: 977 LOMAS SANTA FE DRIVE
Owner/Operator City,State,Zip: SOLANA BEACH, CA 92075
Owner/Operator Telephone: 858-369-7013
Owner/Operator Telephone Ext: Not reported
Owner/Operator Fax: Not reported
Owner/Operator Email: POC@TARGET.COM

Owner/Operator Indicator: Operator
Owner/Operator Name: TARGET CORPORATION
Legal Status: Private
Date Became Current: 20170308
Date Ended Current: Not reported
Owner/Operator Address: Not reported
Owner/Operator City,State,Zip: Not reported
Owner/Operator Telephone: Not reported
Owner/Operator Telephone Ext: Not reported
Owner/Operator Fax: Not reported
Owner/Operator Email: Not reported

Owner/Operator Indicator: Owner
Owner/Operator Name: MARIN GATEWAY GARP, LLC
Legal Status: Private
Date Became Current: 20110215
Date Ended Current: Not reported
Owner/Operator Address: 977 LOMAS SANTA FE DRIVE
Owner/Operator City,State,Zip: SOLANA BEACH, CA 92075
Owner/Operator Telephone: 858-369-7013
Owner/Operator Telephone Ext: Not reported
Owner/Operator Fax: Not reported
Owner/Operator Email: Not reported

TARGET STORE T3240 (Continued) **1023675039**

Historic Generators:

Receive Date:	20170117
Handler Name: TARGET STORE T3240	
Federal Waste Generator Description:	Small Quantity Generator
State District Owner:	Not reported
Large Quantity Handler of Universal Waste:	No
Recognized Trader Importer:	No
Recognized Trader Exporter:	No
Spent Lead Acid Battery Importer:	No
Spent Lead Acid Battery Exporter:	No
Current Record:	No
Non Storage Recycler Activity:	Not reported
Electronic Manifest Broker:	Not reported

Receive Date:	20211217
Handler Name: TARGET STORE T3240	
Federal Waste Generator Description:	Large Quantity Generator
State District Owner:	Not reported
Large Quantity Handler of Universal Waste:	No
Recognized Trader Importer:	No
Recognized Trader Exporter:	No
Spent Lead Acid Battery Importer:	No
Spent Lead Acid Battery Exporter:	No
Current Record:	Yes
Non Storage Recycler Activity:	No
Electronic Manifest Broker:	No

List of NAICS Codes and Descriptions:

NAICS Code:	452112
NAICS Description:	DISCOUNT DEPARTMENT STORES

NAICS Code:	452210
NAICS Description:	DEPARTMENT STORES

Facility Has Received Notices of Violations:

Violations:	No Violations Found

Evaluation Action Summary:

Evaluations:	No Evaluations Found

D20 **CVS PHARMACY #17694** **CERS HAZ WASTE** **S121781015**
ESE **180 DONAHUE ST STE B** **HAZNET** **N/A**
< 1/8 **SAUSALITO, CA 94965** **HWTS**
0.110 mi.
583 ft. **Site 6 of 6 in cluster D**

Relative:
Lower

Actual:
25 ft.

CERS HAZ WASTE:

Name:	CVS PHARMACY #17694
Address:	180 DONAHUE ST STE B
City,State,Zip:	SAUSALITO, CA 94965
Site ID:	421929
CERS ID:	10733515
CERS Description:	Hazardous Waste Generator

Violations:

CVS PHARMACY #17694 (Continued) **S121781015**

Site ID: 421929
Site Name: CVS Pharmacy #17694
Violation Date: 10-31-2017
Citation: HSC 6.5 25160(b)(1)(C) - California Health and Safety Code, Chapter 6.5, Section(s) 25160(b)(1)(C)
Violation Description: Failure to send a legible copy of each hazardous waste manifest to the Department within 30 days of each shipment of hazardous waste.
Violation Notes: Returned to compliance on 11/08/2017. Hazardous wastes were picked up with a manifest in August 2017 but the manifest was not submitted to DTSC. Send manifests to DTSC within 30 days or by November 30, 2017.
Violation Division: Marin County Dept of Public Works, Waste Mgmt, CUP
Violation Program: HW
Violation Source: CERS,

Evaluation:
Eval General Type: Compliance Evaluation Inspection
Eval Date: 10-31-2017
Violations Found: Yes
Eval Type: Routine done by local agency
Eval Notes: Not reported
Eval Division: Marin County Dept of Public Works, Waste Mgmt, CUP
Eval Program: HW
Eval Source: CERS,

Affiliation:
Affiliation Type Desc: Document Preparer
Entity Name: Erin Deiotte, Agent for Garfield Beach CVS, L.L.C.
Entity Title: Not reported
Affiliation Address: Not reported
Affiliation City: Not reported
Affiliation State: Not reported
Affiliation Country: Not reported
Affiliation Zip: Not reported
Affiliation Phone: ,

Affiliation Type Desc: Environmental Contact
Entity Name: Verisk 3E, Regulatory Services/CVS
Entity Title: Not reported
Affiliation Address: 3207 Grey Hawk Ct., Ste. 200
Affiliation City: Carlsbad
Affiliation State: CA
Affiliation Country: Not reported
Affiliation Zip: 92010
Affiliation Phone: ,

Affiliation Type Desc: Facility Mailing Address
Entity Name: Mailing Address
Entity Title: Not reported
Affiliation Address: CVS Health, Attn: Erin Chilinski, One CVS Drive - MC 1160
Affiliation City: Woonsocket
Affiliation State: RI
Affiliation Country: Not reported
Affiliation Zip: 02895
Affiliation Phone: ,

Affiliation Type Desc: Operator

CVS PHARMACY #17694 (Continued) **S121781015**

Entity Name:	Garfield Beach CVS, L.L.C.
Entity Title:	Not reported
Affiliation Address:	Not reported
Affiliation City:	Not reported
Affiliation State:	Not reported
Affiliation Country:	Not reported
Affiliation Zip:	Not reported
Affiliation Phone:	(401) 765-1500,
Affiliation Type Desc:	Parent Corporation
Entity Name:	CVS Health
Entity Title:	Not reported
Affiliation Address:	Not reported
Affiliation City:	Not reported
Affiliation State:	Not reported
Affiliation Country:	Not reported
Affiliation Zip:	Not reported
Affiliation Phone:	,
Affiliation Type Desc:	CUPA District
Entity Name:	Marin County CUPA
Entity Title:	Not reported
Affiliation Address:	1600 Los GamosSuite 210
Affiliation City:	San Rafael
Affiliation State:	CA
Affiliation Country:	Not reported
Affiliation Zip:	94903
Affiliation Phone:	(415) 473-6647,
Affiliation Type Desc:	Identification Signer
Entity Name:	Erin Deiotte, Agent for Garfield Beach CVS, L.L.C.
Entity Title:	Regulatory Compliance Specialist, Verisk 3E
Affiliation Address:	Not reported
Affiliation City:	Not reported
Affiliation State:	Not reported
Affiliation Country:	Not reported
Affiliation Zip:	Not reported
Affiliation Phone:	,
Affiliation Type Desc:	Legal Owner
Entity Name:	Garfield Beach CVS, L.L.C.
Entity Title:	Not reported
Affiliation Address:	One CVS Drive
Affiliation City:	Woonsocket
Affiliation State:	RI
Affiliation Country:	United States
Affiliation Zip:	02895
Affiliation Phone:	(401) 765-1500,

HAZNET:

Name:	CVS PHARMACY #17694
Address:	180 DONAHUE ST STE B
Address 2:	Not reported
City,State,Zip:	SAUSALITO, CA 94965
Contact:	NICOLE WILKINSON
Telephone:	4017707132

CVS PHARMACY #17694 (Continued) **S121781015**

Mailing Name: Not reported
Mailing Address: 1 CVS DR MC2340

Year: 2021
Gepaid: CAR000272377
TSD EPA ID: NVD980895338
CA Waste Code: 311 - Pharmaceutical waste
Disposal Method: H141 - Storage, Bulking, And/Or Transfer Off Site--No Treatment/Reovery (H010-H129) Or (H131-H135)
Tons: 0.0105

Year: 2021
Gepaid: CAR000272377
TSD EPA ID: CAD980884183
CA Waste Code: 311 - Pharmaceutical waste
Disposal Method: H141 - Storage, Bulking, And/Or Transfer Off Site--No Treatment/Reovery (H010-H129) Or (H131-H135)
Tons: 0.001

Year: 2020
Gepaid: CAR000272377
TSD EPA ID: CAD980884183
CA Waste Code: 311 - Pharmaceutical waste
Disposal Method: H141 - Storage, Bulking, And/Or Transfer Off Site--No Treatment/Reovery (H010-H129) Or (H131-H135)
Tons: 0.007

Year: 2019
Gepaid: CAR000272377
TSD EPA ID: INR000110197
CA Waste Code: 311 - Pharmaceutical waste
Disposal Method: H141 - Storage, Bulking, And/Or Transfer Off Site--No Treatment/Reovery (H010-H129) Or (H131-H135)
Tons: 0.00150

Year: 2018
Gepaid: CAR000272377
TSD EPA ID: INR000110197
CA Waste Code: 311 - Pharmaceutical waste
Disposal Method: H141 - Storage, Bulking, And/Or Transfer Off Site--No Treatment/Reovery (H010-H129) Or (H131-H135)
Tons: 0.00200

Year: 2018
Gepaid: CAR000272377
TSD EPA ID: NVD980895338
CA Waste Code: 311 - Pharmaceutical waste
Disposal Method: H141 - Storage, Bulking, And/Or Transfer Off Site--No Treatment/Reovery (H010-H129) Or (H131-H135)
Tons: 0.00700

Year: 2017
Gepaid: CAR000272377
TSD EPA ID: NVD980895338
CA Waste Code: 311 - Pharmaceutical waste
Disposal Method: H141 - Storage, Bulking, And/Or Transfer Off Site--No Treatment/Reovery (H010-H129) Or (H131-H135)

CVS PHARMACY #17694 (Continued) **S121781015**

Tons:	0.0015
Year:	2017
Gepaid:	CAR000272377
TSD EPA ID:	INR000110197
CA Waste Code:	311 - Pharmaceutical waste
Disposal Method:	H141 - Storage, Bulking, And/Or Transfer Off Site--No Treatment/Reovery (H010-H129) Or (H131-H135)
Tons:	0.0005

Detail Two:

Year:	2020
EM Manifest ID:	0fb42e78-cf46-4554-a6d8-716abcd76ae7
Shipment Date:	8/28/2019
Receipt Date:	9/9/2019
Manifest Number:	013657635FLE
Generator EPA ID:	CAR000272377
Name:	CVS (SIS)
Address:	180 DONAHUE STREET
Address 2:	Not reported
City:	SAUSALITO
Zip:	94965-1250
Telephone:	800-924-6804
Contact:	Not reported
Contact Telephone:	916-351-0980
Transporter 1 EPA ID:	MNS000110924
Transporter 1 Emergency Number:	Not reported
Transporter 2 EPA ID:	MNS000110924
Transporter 2 Emergency Number:	Not reported
TSDF EPA ID:	CAD980884183
TSDF Name:	GEM Rancho Cordova LLC
TSDF Address 1:	11855 White Rock Road
TSDF Address 2:	Not reported
TSDF City:	Rancho Cordova
TSDF Zip:	95742
TSDF Telephone:	Not reported

Federal:

Year:	2020
EM Manifest ID:	0fb42e78-cf46-4554-a6d8-716abcd76ae7
Generator EPA ID:	CAR000272377
Shipment Date:	2019-08-28
Manifest Number:	013657635FLE
Line Number:	1
Method Code:	H141
Quantity Tons:	0.00050
Quantity Waste:	1.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	Fiber or plastic boxes, cartons, cases
Quantity Type:	Pounds
Federal Code:	D007
Year:	2020
EM Manifest ID:	0fb42e78-cf46-4554-a6d8-716abcd76ae7
Generator EPA ID:	CAR000272377

CVS PHARMACY #17694 (Continued) **S121781015**

Shipment Date:	2019-08-28
Manifest Number:	013657635FLE
Line Number:	1
Method Code:	H141
Quantity Tons:	0.00050
Quantity Waste:	1.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	Fiber or plastic boxes, cartons, cases
Quantity Type:	Pounds
Federal Code:	D010

Year:	2020
EM Manifest ID:	0fb42e78-cf46-4554-a6d8-716abcd76ae7
Generator EPA ID:	CAR000272377
Shipment Date:	2019-08-28
Manifest Number:	013657635FLE
Line Number:	2
Method Code:	H141
Quantity Tons:	0.00050
Quantity Waste:	1.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	Fiber or plastic boxes, cartons, cases
Quantity Type:	Pounds
Federal Code:	P001

State:

Year:	2020
EM Manifest ID:	0fb42e78-cf46-4554-a6d8-716abcd76ae7
Generator EPA ID:	CAR000272377
Shipment Date:	2019-08-28
Manifest Number:	013657635FLE
Line Number:	1
Method Code:	H141
Quantity Tons:	0.00050
Quantity Waste:	1.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	Fiber or plastic boxes, cartons, cases
Quantity Type:	Pounds
State Code:	311

Year:	2020
EM Manifest ID:	0fb42e78-cf46-4554-a6d8-716abcd76ae7
Generator EPA ID:	CAR000272377
Shipment Date:	2019-08-28
Manifest Number:	013657635FLE
Line Number:	2
Method Code:	H141
Quantity Tons:	0.00050
Quantity Waste:	1.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	Fiber or plastic boxes, cartons, cases
Quantity Type:	Pounds
State Code:	311

CVS PHARMACY #17694 (Continued) **S121781015**

Year:	2020
EM Manifest ID:	91e81769-0772-4d42-a362-17f382585915
Shipment Date:	6/23/2020
Receipt Date:	6/29/2020
Manifest Number:	014902059FLE
Generator EPA ID:	CAR000272377
Name:	CVS (SIS)
Address:	180 DONAHUE STREET
Address 2:	Not reported
City:	SAUSALITO
Zip:	94965-1250
Telephone:	877-577-2669
Contact:	Not reported
Contact Telephone:	916-351-0980
Transporter 1 EPA ID:	MNS000110924
Transporter 1 Emergency Number:	Not reported
Transporter 2 EPA ID:	MNS000110924
Transporter 2 Emergency Number:	Not reported
TSDF EPA ID:	CAD980884183
TSDF Name:	GEM Rancho Cordova LLC
TSDF Address 1:	11855 White Rock Road
TSDF Address 2:	Not reported
TSDF City:	Rancho Cordova
TSDF Zip:	95742
TSDF Telephone:	Not reported

Federal:

Year:	2020
EM Manifest ID:	91e81769-0772-4d42-a362-17f382585915
Generator EPA ID:	CAR000272377
Shipment Date:	2020-06-23
Manifest Number:	014902059FLE
Line Number:	1
Method Code:	H141
Quantity Tons:	0.00250
Quantity Waste:	5.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	Fiber or plastic boxes, cartons, cases
Quantity Type:	Pounds
Federal Code:	D007

Year:	2020
EM Manifest ID:	91e81769-0772-4d42-a362-17f382585915
Generator EPA ID:	CAR000272377
Shipment Date:	2020-06-23
Manifest Number:	014902059FLE
Line Number:	1
Method Code:	H141
Quantity Tons:	0.00250
Quantity Waste:	5.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	Fiber or plastic boxes, cartons, cases
Quantity Type:	Pounds
Federal Code:	D010

Year:	2020

CVS PHARMACY #17694 (Continued) **S121781015**

EM Manifest ID: 91e81769-0772-4d42-a362-17f382585915
Generator EPA ID: CAR000272377
Shipment Date: 2020-06-23
Manifest Number: 014902059FLE
Line Number: 2
Method Code: H141
Quantity Tons: 0.00050
Quantity Waste: 1.000000
Quantity Unit: P
Number of Containers: 1
Type of Container: Fiber or plastic boxes, cartons, cases
Quantity Type: Pounds
Federal Code: P001

State:
Year: 2020
EM Manifest ID: 91e81769-0772-4d42-a362-17f382585915
Generator EPA ID: CAR000272377
Shipment Date: 2020-06-23
Manifest Number: 014902059FLE
Line Number: 1
Method Code: H141
Quantity Tons: 0.00250
Quantity Waste: 5.000000
Quantity Unit: P
Number of Containers: 1
Type of Container: Fiber or plastic boxes, cartons, cases
Quantity Type: Pounds
State Code: 311

Year: 2020
EM Manifest ID: 91e81769-0772-4d42-a362-17f382585915
Generator EPA ID: CAR000272377
Shipment Date: 2020-06-23
Manifest Number: 014902059FLE
Line Number: 2
Method Code: H141
Quantity Tons: 0.00050
Quantity Waste: 1.000000
Quantity Unit: P
Number of Containers: 1
Type of Container: Fiber or plastic boxes, cartons, cases
Quantity Type: Pounds
State Code: 311

Year: 2020
EM Manifest ID: 4df92319-4d58-49c0-a9a8-6415a13dd773
Shipment Date: 4/10/2020
Receipt Date: 4/17/2020
Manifest Number: 014375787FLE
Generator EPA ID: CAR000272377
Name: CVS (SIS)
Address: 180 DONAHUE STREET
Address 2: Not reported
City: SAUSALITO
Zip: 94965-1250

CVS PHARMACY #17694 (Continued) **S121781015**

Telephone:	800-924-6804
Contact:	Not reported
Contact Telephone:	916-351-0980
Transporter 1 EPA ID:	MNS000110924
Transporter 1 Emergency Number:	Not reported
Transporter 2 EPA ID:	MNS000110924
Transporter 2 Emergency Number:	Not reported
TSDF EPA ID:	CAD980884183
TSDF Name:	GEM Rancho Cordova LLC
TSDF Address 1:	11855 White Rock Road
TSDF Address 2:	Not reported
TSDF City:	Rancho Cordova
TSDF Zip:	95742
TSDF Telephone:	Not reported

Federal:

Year:	2020
EM Manifest ID:	4df92319-4d58-49c0-a9a8-6415a13dd773
Generator EPA ID:	CAR000272377
Shipment Date:	2020-04-10
Manifest Number:	014375787FLE
Line Number:	1
Method Code:	H141
Quantity Tons:	0.00200
Quantity Waste:	4.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	Fiber or plastic boxes, cartons, cases
Quantity Type:	Pounds
Federal Code:	D007

Year:	2020
EM Manifest ID:	4df92319-4d58-49c0-a9a8-6415a13dd773
Generator EPA ID:	CAR000272377
Shipment Date:	2020-04-10
Manifest Number:	014375787FLE
Line Number:	1
Method Code:	H141
Quantity Tons:	0.00200
Quantity Waste:	4.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	Fiber or plastic boxes, cartons, cases
Quantity Type:	Pounds
Federal Code:	D010

Year:	2020
EM Manifest ID:	4df92319-4d58-49c0-a9a8-6415a13dd773
Generator EPA ID:	CAR000272377
Shipment Date:	2020-04-10
Manifest Number:	014375787FLE
Line Number:	2
Method Code:	H141
Quantity Tons:	0.00050
Quantity Waste:	1.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	Fiber or plastic boxes, cartons, cases

CVS PHARMACY #17694 (Continued) **S121781015**

Quantity Type: Pounds
Federal Code: P001

State:
Year: 2020
EM Manifest ID: 4df92319-4d58-49c0-a9a8-6415a13dd773
Generator EPA ID: CAR000272377
Shipment Date: 2020-04-10
Manifest Number: 014375787FLE
Line Number: 1
Method Code: H141
Quantity Tons: 0.00200
Quantity Waste: 4.000000
Quantity Unit: P
Number of Containers: 1
Type of Container: Fiber or plastic boxes, cartons, cases
Quantity Type: Pounds
State Code: 311

Year: 2020
EM Manifest ID: 4df92319-4d58-49c0-a9a8-6415a13dd773
Generator EPA ID: CAR000272377
Shipment Date: 2020-04-10
Manifest Number: 014375787FLE
Line Number: 2
Method Code: H141
Quantity Tons: 0.00050
Quantity Waste: 1.000000
Quantity Unit: P
Number of Containers: 1
Type of Container: Fiber or plastic boxes, cartons, cases
Quantity Type: Pounds
State Code: 311

Year: 2020
EM Manifest ID: 826ea8ef-1ac8-4c9a-a16f-34037fd1d77f
Shipment Date: 11/4/2019
Receipt Date: 11/11/2019
Manifest Number: 014011938FLE
Generator EPA ID: CAR000272377
Name: CVS (SIS)
Address: 180 DONAHUE STREET
Address 2: Not reported
City: SAUSALITO
Zip: 94965-1250
Telephone: 800-924-6804
Contact: Not reported
Contact Telephone: 916-351-0980
Transporter 1 EPA ID: MNS000110924
Transporter 1 Emergency Number: Not reported
Transporter 2 EPA ID: MNS000110924
Transporter 2 Emergency Number: Not reported
TSDF EPA ID: CAD980884183
TSDF Name: GEM Rancho Cordova LLC
TSDF Address 1: 11855 White Rock Road
TSDF Address 2: Not reported

CVS PHARMACY #17694 (Continued) **S121781015**

TSDF City: Rancho Cordova
TSDF Zip: 95742
TSDF Telephone: Not reported

Federal:
Year: 2020
EM Manifest ID: 826ea8ef-1ac8-4c9a-a16f-34037fd1d77f
Generator EPA ID: CAR000272377
Shipment Date: 2019-11-04
Manifest Number: 014011938FLE
Line Number: 1
Method Code: H141
Quantity Tons: 0.00050
Quantity Waste: 1.000000
Quantity Unit: P
Number of Containers: 1
Type of Container: Fiber or plastic boxes, cartons, cases
Quantity Type: Pounds
Federal Code: P001

Year: 2020
EM Manifest ID: 826ea8ef-1ac8-4c9a-a16f-34037fd1d77f
Generator EPA ID: CAR000272377
Shipment Date: 2019-11-04
Manifest Number: 014011938FLE
Line Number: 2
Method Code: H141
Quantity Tons: 0.00400
Quantity Waste: 8.000000
Quantity Unit: P
Number of Containers: 1
Type of Container: Fiber or plastic boxes, cartons, cases
Quantity Type: Pounds
Federal Code: D007

Year: 2020
EM Manifest ID: 826ea8ef-1ac8-4c9a-a16f-34037fd1d77f
Generator EPA ID: CAR000272377
Shipment Date: 2019-11-04
Manifest Number: 014011938FLE
Line Number: 2
Method Code: H141
Quantity Tons: 0.00400
Quantity Waste: 8.000000
Quantity Unit: P
Number of Containers: 1
Type of Container: Fiber or plastic boxes, cartons, cases
Quantity Type: Pounds
Federal Code: D010

State:
Year: 2020
EM Manifest ID: 826ea8ef-1ac8-4c9a-a16f-34037fd1d77f
Generator EPA ID: CAR000272377
Shipment Date: 2019-11-04
Manifest Number: 014011938FLE
Line Number: 1

CVS PHARMACY #17694 (Continued) **S121781015**

Method Code:	H141
Quantity Tons:	0.00050
Quantity Waste:	1.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	Fiber or plastic boxes, cartons, cases
Quantity Type:	Pounds
State Code:	311

Year:	2020
EM Manifest ID:	826ea8ef-1ac8-4c9a-a16f-34037fd1d77f
Generator EPA ID:	CAR000272377
Shipment Date:	2019-11-04
Manifest Number:	014011938FLE
Line Number:	2
Method Code:	H141
Quantity Tons:	0.00400
Quantity Waste:	8.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	Fiber or plastic boxes, cartons, cases
Quantity Type:	Pounds
State Code:	311

Detail Two:

Year:	2019
EM Manifest ID:	32e44be2-620e-4449-be54-2147ef1ddef3
Shipment Date:	6/4/2019
Receipt Date:	6/19/2019
Manifest Number:	013123608FLE
Generator EPA ID:	CAR000272377
Name:	CVS (SIS)
Address:	180 DONAHUE STREET
Address 2:	Not reported
City:	SAUSALITO
Zip:	94965-1250
Telephone:	800-924-6804
Contact:	Not reported
Contact Telephone:	323-776-6233
Transporter 1 EPA ID:	MNS000110924
Transporter 1 Emergency Number:	Not reported
Transporter 2 EPA ID:	MNS000110924
Transporter 2 Emergency Number:	Not reported
TSDF EPA ID:	CAD008364432
TSDF Name:	Rho Chem LLC
TSDF Address 1:	425 Isis Ave.
TSDF Address 2:	Not reported
TSDF City:	Inglewood
TSDF Zip:	90301
TSDF Telephone:	Not reported

Federal:

Year:	2019
EM Manifest ID:	32e44be2-620e-4449-be54-2147ef1ddef3
Generator EPA ID:	CAR000272377
Shipment Date:	2019-06-04

CVS PHARMACY #17694 (Continued) **S121781015**

Manifest Number:	013123608FLE
Line Number:	1
Method Code:	H141
Quantity Tons:	0.00100
Quantity Waste:	2.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	Fiber or plastic boxes, cartons, cases
Quantity Type:	Pounds
Federal Code:	D007

Year:	2019
EM Manifest ID:	32e44be2-620e-4449-be54-2147ef1ddef3
Generator EPA ID:	CAR000272377
Shipment Date:	2019-06-04
Manifest Number:	013123608FLE
Line Number:	1
Method Code:	H141
Quantity Tons:	0.00100
Quantity Waste:	2.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	Fiber or plastic boxes, cartons, cases
Quantity Type:	Pounds
Federal Code:	D010

State:

Year:	2019
EM Manifest ID:	32e44be2-620e-4449-be54-2147ef1ddef3
Generator EPA ID:	CAR000272377
Shipment Date:	2019-06-04
Manifest Number:	013123608FLE
Line Number:	1
Method Code:	H141
Quantity Tons:	0.00100
Quantity Waste:	2.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	Fiber or plastic boxes, cartons, cases
Quantity Type:	Pounds
State Code:	311

Year:	2019
EM Manifest ID:	5911e899-78b1-4eb2-a9ca-a3ab91b5f3a1
Shipment Date:	3/13/2019
Receipt Date:	3/29/2019
Manifest Number:	013400741FLE
Generator EPA ID:	CAR000272377
Name:	CVS (SIS)
Address:	180 DONAHUE STREET
Address 2:	Not reported
City:	SAUSALITO
Zip:	94965
Telephone:	800-924-6804
Contact:	Not reported
Contact Telephone:	323-776-6233

CVS PHARMACY #17694 (Continued) **S121781015**

Transporter 1 EPA ID:	MNS000110924
Transporter 1 Emergency Number:	Not reported
Transporter 2 EPA ID:	MNS000110924
Transporter 2 Emergency Number:	Not reported
TSDF EPA ID:	CAD008364432
TSDF Name:	Rho Chem LLC
TSDF Address 1:	425 Isis Ave.
TSDF Address 2:	Not reported
TSDF City:	Inglewood
TSDF Zip:	90301
TSDF Telephone:	Not reported

Federal:

Year:	2019
EM Manifest ID:	5911e899-78b1-4eb2-a9ca-a3ab91b5f3a1
Generator EPA ID:	CAR000272377
Shipment Date:	2019-03-13
Manifest Number:	013400741FLE
Line Number:	1
Method Code:	H141
Quantity Tons:	0.00100
Quantity Waste:	2.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	Fiber or plastic boxes, cartons, cases
Quantity Type:	Pounds
Federal Code:	D007

Year:	2019
EM Manifest ID:	5911e899-78b1-4eb2-a9ca-a3ab91b5f3a1
Generator EPA ID:	CAR000272377
Shipment Date:	2019-03-13
Manifest Number:	013400741FLE
Line Number:	1
Method Code:	H141
Quantity Tons:	0.00100
Quantity Waste:	2.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	Fiber or plastic boxes, cartons, cases
Quantity Type:	Pounds
Federal Code:	D010

State:

Year:	2019
EM Manifest ID:	5911e899-78b1-4eb2-a9ca-a3ab91b5f3a1
Generator EPA ID:	CAR000272377
Shipment Date:	2019-03-13
Manifest Number:	013400741FLE
Line Number:	1
Method Code:	H141
Quantity Tons:	0.00100
Quantity Waste:	2.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	Fiber or plastic boxes, cartons, cases
Quantity Type:	Pounds

CVS PHARMACY #17694 (Continued) **S121781015**

State Code: 311

Year: 2019
EM Manifest ID: 270539
Shipment Date: 12/27/2018
Receipt Date: 1/29/2019
Manifest Number: 012485656FLE
Generator EPA ID: CAR000272377
Name: CVS (SIS)
Address: 180 DONAHUE STREET
Address 2: Not reported
City: SAUSALITO
Zip: 94965
Telephone: 800-924-6804
Contact: Not reported
Contact Telephone: 775-575-2760
Transporter 1 EPA ID: MNS000110924
Transporter 1 Emergency Number: Not reported
Transporter 2 EPA ID: MNS000110924
Transporter 2 Emergency Number: Not reported
TSDF EPA ID: NVD980895338
TSDF Name: 21st Century Environmental Management of Nevada, LLC
TSDF Address 1: 2095 Newlands Drive East
TSDF Address 2: Not reported
TSDF City: Fernley
TSDF Zip: 89408
TSDF Telephone: Not reported

Federal:
Year: 2019
EM Manifest ID: 270539
Generator EPA ID: CAR000272377
Shipment Date: 2018-12-27
Manifest Number: 012485656FLE
Line Number: 1
Method Code: H141
Quantity Tons: 0.00050
Quantity Waste: 1.000000
Quantity Unit: P
Number of Containers: 1
Type of Container: Fiber or plastic boxes, cartons, cases
Quantity Type: Pounds
Federal Code: P001

Year: 2019
EM Manifest ID: 270539
Generator EPA ID: CAR000272377
Shipment Date: 2018-12-27
Manifest Number: 012485656FLE
Line Number: 2
Method Code: H141
Quantity Tons: 0.00150
Quantity Waste: 3.000000
Quantity Unit: P
Number of Containers: 1
Type of Container: Fiber or plastic boxes, cartons, cases
Quantity Type: Pounds

CVS PHARMACY #17694 (Continued) **S121781015**

Federal Code: D007

Year: 2019
EM Manifest ID: 270539
Generator EPA ID: CAR000272377
Shipment Date: 2018-12-27
Manifest Number: 012485656FLE
Line Number: 2
Method Code: H141
Quantity Tons: 0.00150
Quantity Waste: 3.000000
Quantity Unit: P
Number of Containers: 1
Type of Container: Fiber or plastic boxes, cartons, cases
Quantity Type: Pounds
Federal Code: D010

State:
Year: 2019
EM Manifest ID: 270539
Generator EPA ID: CAR000272377
Shipment Date: 2018-12-27
Manifest Number: 012485656FLE
Line Number: 1
Method Code: H141
Quantity Tons: 0.00050
Quantity Waste: 1.000000
Quantity Unit: P
Number of Containers: 1
Type of Container: Fiber or plastic boxes, cartons, cases
Quantity Type: Pounds
State Code: 311

Year: 2019
EM Manifest ID: 270539
Generator EPA ID: CAR000272377
Shipment Date: 2018-12-27
Manifest Number: 012485656FLE
Line Number: 2
Method Code: H141
Quantity Tons: 0.00150
Quantity Waste: 3.000000
Quantity Unit: P
Number of Containers: 1
Type of Container: Fiber or plastic boxes, cartons, cases
Quantity Type: Pounds
State Code: 311

Detail Two:
Year: 2018
EM Manifest ID: 010176958FLE20170817_D_1
Shipment Date: 8/17/2017
Receipt Date: 9/7/2017
Manifest Number: 010176958FLE
Generator EPA ID: CAR000272377

CVS PHARMACY #17694 (Continued) **S121781015**

Name:	CVS # 17694
Address:	Not reported
Address 2:	Not reported
City:	Not reported
Zip:	Not reported
Telephone:	Not reported
Contact:	Not reported
Contact Telephone:	Not reported
Transporter 1 EPA ID:	MNS000110924
Transporter 1 Emergency Number:	Not reported
Transporter 2 EPA ID:	NED986382133
Transporter 2 Emergency Number:	Not reported
TSDF EPA ID:	NVD980895338
TSDF Name:	21ST CENTURY EMN LLC
TSDF Address 1:	Not reported
TSDF Address 2:	Not reported
TSDF City:	Not reported
TSDF Zip:	Not reported
TSDF Telephone:	Not reported

Federal:

Year:	2018
EM Manifest ID:	010176958FLE20170817_D_1
Generator EPA ID:	CAR000272377
Shipment Date:	2017-08-17
Manifest Number:	010176958FLE
Line Number:	1
Method Code:	H141
Quantity Tons:	0.00100
Quantity Waste:	2.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	NULL
Quantity Type:	NULL
Federal Code:	D007

Year:	2018
EM Manifest ID:	010176958FLE20170817_D_1
Generator EPA ID:	CAR000272377
Shipment Date:	2017-08-17
Manifest Number:	010176958FLE
Line Number:	1
Method Code:	H141
Quantity Tons:	0.00100
Quantity Waste:	2.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	NULL
Quantity Type:	NULL
Federal Code:	D010

Year:	2018
EM Manifest ID:	010176958FLE20170817_D_1
Generator EPA ID:	CAR000272377
Shipment Date:	2017-08-17
Manifest Number:	010176958FLE
Line Number:	2
Method Code:	H141

CVS PHARMACY #17694 (Continued) **S121781015**

Quantity Tons:	0.00050
Quantity Waste:	1.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	NULL
Quantity Type:	NULL
Federal Code:	P001

State:

Year:	2018
EM Manifest ID:	010176958FLE20170817_D_1
Generator EPA ID:	CAR000272377
Shipment Date:	2017-08-17
Manifest Number:	010176958FLE
Line Number:	1
Method Code:	H141
Quantity Tons:	0.00100
Quantity Waste:	2.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	NULL
Quantity Type:	NULL
State Code:	311

Year:	2018
EM Manifest ID:	010176958FLE20170817_D_1
Generator EPA ID:	CAR000272377
Shipment Date:	2017-08-17
Manifest Number:	010176958FLE
Line Number:	2
Method Code:	H141
Quantity Tons:	0.00050
Quantity Waste:	1.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	NULL
Quantity Type:	NULL
State Code:	311

Year:	2018
EM Manifest ID:	011388391FLE20180419_D_1
Shipment Date:	4/19/2018
Receipt Date:	5/16/2018
Manifest Number:	011388391FLE
Generator EPA ID:	CAR000272377
Name:	CVS # 17694
Address:	Not reported
Address 2:	Not reported
City:	Not reported
Zip:	Not reported
Telephone:	Not reported
Contact:	Not reported
Contact Telephone:	Not reported
Transporter 1 EPA ID:	MNS000110924
Transporter 1 Emergency Number:	Not reported
Transporter 2 EPA ID:	NED986382133

CVS PHARMACY #17694 (Continued) **S121781015**

Transporter 2 Emergency Number: Not reported
TSDF EPA ID: INR000110197
TSDF Name: STERICYCLE INC
TSDF Address 1: Not reported
TSDF Address 2: Not reported
TSDF City: Not reported
TSDF Zip: Not reported
TSDF Telephone: Not reported

Federal:
Year: 2018
EM Manifest ID: 011388391FLE20180419_D_1
Generator EPA ID: CAR000272377
Shipment Date: 2018-04-19
Manifest Number: 011388391FLE
Line Number: 1
Method Code: H141
Quantity Tons: 0.00050
Quantity Waste: 1.000000
Quantity Unit: P
Number of Containers: 1
Type of Container: NULL
Quantity Type: NULL
Federal Code: D001

State:
Year: 2018
EM Manifest ID: 011388391FLE20180419_D_1
Generator EPA ID: CAR000272377
Shipment Date: 2018-04-19
Manifest Number: 011388391FLE
Line Number: 1
Method Code: H141
Quantity Tons: 0.00050
Quantity Waste: 1.000000
Quantity Unit: P
Number of Containers: 1
Type of Container: NULL
Quantity Type: NULL
State Code: 311

Year: 2018
EM Manifest ID: 011388392FLE20180419_D_1
Shipment Date: 4/19/2018
Receipt Date: 5/9/2018
Manifest Number: 011388392FLE
Generator EPA ID: CAR000272377
Name: CVS # 17694
Address: Not reported
Address 2: Not reported
City: Not reported
Zip: Not reported
Telephone: Not reported
Contact: Not reported
Contact Telephone: Not reported
Transporter 1 EPA ID: MNS000110924

CVS PHARMACY #17694 (Continued) **S121781015**

Transporter 1 Emergency Number:	Not reported
Transporter 2 EPA ID:	NED986382133
Transporter 2 Emergency Number:	Not reported
TSDF EPA ID:	NVD980895338
TSDF Name:	21ST CENTURY EMN LLC
TSDF Address 1:	Not reported
TSDF Address 2:	Not reported
TSDF City:	Not reported
TSDF Zip:	Not reported
TSDF Telephone:	Not reported

Federal:

Year:	2018
EM Manifest ID:	011388392FLE20180419_D_1
Generator EPA ID:	CAR000272377
Shipment Date:	2018-04-19
Manifest Number:	011388392FLE
Line Number:	1
Method Code:	H141
Quantity Tons:	0.00200
Quantity Waste:	4.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	NULL
Quantity Type:	NULL
Federal Code:	D007

Year:	2018
EM Manifest ID:	011388392FLE20180419_D_1
Generator EPA ID:	CAR000272377
Shipment Date:	2018-04-19
Manifest Number:	011388392FLE
Line Number:	1
Method Code:	H141
Quantity Tons:	0.00200
Quantity Waste:	4.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	NULL
Quantity Type:	NULL
Federal Code:	D009

Year:	2018
EM Manifest ID:	011388392FLE20180419_D_1
Generator EPA ID:	CAR000272377
Shipment Date:	2018-04-19
Manifest Number:	011388392FLE
Line Number:	1
Method Code:	H141
Quantity Tons:	0.00200
Quantity Waste:	4.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	NULL
Quantity Type:	NULL
Federal Code:	D010

Year:	2018

CVS PHARMACY #17694 (Continued) **S121781015**

EM Manifest ID: 011388392FLE20180419_D_1
Generator EPA ID: CAR000272377
Shipment Date: 2018-04-19
Manifest Number: 011388392FLE
Line Number: 1
Method Code: H141
Quantity Tons: 0.00200
Quantity Waste: 4.000000
Quantity Unit: P
Number of Containers: 1
Type of Container: NULL
Quantity Type: NULL
Federal Code: D024

State:
Year: 2018
EM Manifest ID: 011388392FLE20180419_D_1
Generator EPA ID: CAR000272377
Shipment Date: 2018-04-19
Manifest Number: 011388392FLE
Line Number: 1
Method Code: H141
Quantity Tons: 0.00200
Quantity Waste: 4.000000
Quantity Unit: P
Number of Containers: 1
Type of Container: NULL
Quantity Type: NULL
State Code: 311

Year: 2018
EM Manifest ID: 010177267FLE20171107_D_1
Shipment Date: 11/7/2017
Receipt Date: 12/4/2017
Manifest Number: 010177267FLE
Generator EPA ID: CAR000272377
Name: CVS # 17694
Address: Not reported
Address 2: Not reported
City: Not reported
Zip: Not reported
Telephone: Not reported
Contact: Not reported
Contact Telephone: Not reported
Transporter 1 EPA ID: MNS000110924
Transporter 1 Emergency Number: Not reported
Transporter 2 EPA ID: NED986382133
Transporter 2 Emergency Number: Not reported
TSDF EPA ID: NVD980895338
TSDF Name: 21ST CENTURY EMN LLC
TSDF Address 1: Not reported
TSDF Address 2: Not reported
TSDF City: Not reported
TSDF Zip: Not reported
TSDF Telephone: Not reported

CVS PHARMACY #17694 (Continued) **S121781015**

Federal:

Year:	2018
EM Manifest ID:	010177267FLE20171107_D_1
Generator EPA ID:	CAR000272377
Shipment Date:	2017-11-07
Manifest Number:	010177267FLE
Line Number:	1
Method Code:	H141
Quantity Tons:	0.00050
Quantity Waste:	1.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	NULL
Quantity Type:	NULL
Federal Code:	D007

Year:	2018
EM Manifest ID:	010177267FLE20171107_D_1
Generator EPA ID:	CAR000272377
Shipment Date:	2017-11-07
Manifest Number:	010177267FLE
Line Number:	1
Method Code:	H141
Quantity Tons:	0.00050
Quantity Waste:	1.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	NULL
Quantity Type:	NULL
Federal Code:	D010

State:

Year:	2018
EM Manifest ID:	010177267FLE20171107_D_1
Generator EPA ID:	CAR000272377
Shipment Date:	2017-11-07
Manifest Number:	010177267FLE
Line Number:	1
Method Code:	H141
Quantity Tons:	0.00050
Quantity Waste:	1.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	NULL
Quantity Type:	NULL
State Code:	311

Year:	2018
EM Manifest ID:	010177266FLE20171107_D_1
Shipment Date:	11/7/2017
Receipt Date:	12/13/2017
Manifest Number:	010177266FLE
Generator EPA ID:	CAR000272377
Name:	CVS # 17694
Address:	Not reported

CVS PHARMACY #17694 (Continued) **S121781015**

Address 2:	Not reported
City:	Not reported
Zip:	Not reported
Telephone:	Not reported
Contact:	Not reported
Contact Telephone:	Not reported
Transporter 1 EPA ID:	MNS000110924
Transporter 1 Emergency Number:	Not reported
Transporter 2 EPA ID:	NED986382133
Transporter 2 Emergency Number:	Not reported
TSDF EPA ID:	INR000110197
TSDF Name:	STERICYCLE INC
TSDF Address 1:	Not reported
TSDF Address 2:	Not reported
TSDF City:	Not reported
TSDF Zip:	Not reported
TSDF Telephone:	Not reported

Federal:

Year:	2018
EM Manifest ID:	010177266FLE20171107_D_1
Generator EPA ID:	CAR000272377
Shipment Date:	2017-11-07
Manifest Number:	010177266FLE
Line Number:	1
Method Code:	H141
Quantity Tons:	0.00050
Quantity Waste:	1.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	NULL
Quantity Type:	NULL
Federal Code:	U034

State:

Year:	2018
EM Manifest ID:	010177266FLE20171107_D_1
Generator EPA ID:	CAR000272377
Shipment Date:	2017-11-07
Manifest Number:	010177266FLE
Line Number:	1
Method Code:	H141
Quantity Tons:	0.00050
Quantity Waste:	1.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	NULL
Quantity Type:	NULL
State Code:	311

Year:	2018
EM Manifest ID:	010869450FLE20180127_D_1
Shipment Date:	1/27/2018
Receipt Date:	2/6/2018
Manifest Number:	010869450FLE
Generator EPA ID:	CAR000272377

CVS PHARMACY #17694 (Continued) **S121781015**

Name:	CVS # 17694
Address:	Not reported
Address 2:	Not reported
City:	Not reported
Zip:	Not reported
Telephone:	Not reported
Contact:	Not reported
Contact Telephone:	Not reported
Transporter 1 EPA ID:	MNS000110924
Transporter 1 Emergency Number:	Not reported
Transporter 2 EPA ID:	NED986382133
Transporter 2 Emergency Number:	Not reported
TSDF EPA ID:	NVD980895338
TSDF Name:	21ST CENTURY EMN LLC
TSDF Address 1:	Not reported
TSDF Address 2:	Not reported
TSDF City:	Not reported
TSDF Zip:	Not reported
TSDF Telephone:	Not reported

Federal:

Year:	2018
EM Manifest ID:	010869450FLE20180127_D_1
Generator EPA ID:	CAR000272377
Shipment Date:	2018-01-27
Manifest Number:	010869450FLE
Line Number:	1
Method Code:	H141
Quantity Tons:	0.00100
Quantity Waste:	2.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	NULL
Quantity Type:	NULL
Federal Code:	D007

Year:	2018
EM Manifest ID:	010869450FLE20180127_D_1
Generator EPA ID:	CAR000272377
Shipment Date:	2018-01-27
Manifest Number:	010869450FLE
Line Number:	1
Method Code:	H141
Quantity Tons:	0.00100
Quantity Waste:	2.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	NULL
Quantity Type:	NULL
Federal Code:	D010

Year:	2018
EM Manifest ID:	010869450FLE20180127_D_1
Generator EPA ID:	CAR000272377
Shipment Date:	2018-01-27
Manifest Number:	010869450FLE
Line Number:	2
Method Code:	H141

CVS PHARMACY #17694 (Continued) **S121781015**

Quantity Tons:	0.00050
Quantity Waste:	1.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	NULL
Quantity Type:	NULL
Federal Code:	P001

State:

Year:	2018
EM Manifest ID:	010869450FLE20180127_D_1
Generator EPA ID:	CAR000272377
Shipment Date:	2018-01-27
Manifest Number:	010869450FLE
Line Number:	1
Method Code:	H141
Quantity Tons:	0.00100
Quantity Waste:	2.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	NULL
Quantity Type:	NULL
State Code:	311

Year:	2018
EM Manifest ID:	010869450FLE20180127_D_1
Generator EPA ID:	CAR000272377
Shipment Date:	2018-01-27
Manifest Number:	010869450FLE
Line Number:	2
Method Code:	H141
Quantity Tons:	0.00050
Quantity Waste:	1.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	NULL
Quantity Type:	NULL
State Code:	311

Year:	2018
EM Manifest ID:	010869449FLE20180127_D_1
Shipment Date:	1/27/2018
Receipt Date:	2/14/2018
Manifest Number:	010869449FLE
Generator EPA ID:	CAR000272377
Name:	CVS # 17694
Address:	Not reported
Address 2:	Not reported
City:	Not reported
Zip:	Not reported
Telephone:	Not reported
Contact:	Not reported
Contact Telephone:	Not reported
Transporter 1 EPA ID:	MNS000110924
Transporter 1 Emergency Number:	Not reported
Transporter 2 EPA ID:	NED986382133

CVS PHARMACY #17694 (Continued) **S121781015**

Transporter 2 Emergency Number: Not reported
TSDF EPA ID: INR000110197
TSDF Name: STERICYCLE INC
TSDF Address 1: Not reported
TSDF Address 2: Not reported
TSDF City: Not reported
TSDF Zip: Not reported
TSDF Telephone: Not reported

Federal:
Year: 2018
EM Manifest ID: 010869449FLE20180127_D_1
Generator EPA ID: CAR000272377
Shipment Date: 2018-01-27
Manifest Number: 010869449FLE
Line Number: 1
Method Code: H141
Quantity Tons: 0.00050
Quantity Waste: 1.000000
Quantity Unit: P
Number of Containers: 1
Type of Container: NULL
Quantity Type: NULL
Federal Code: D001

State:
Year: 2018
EM Manifest ID: 010869449FLE20180127_D_1
Generator EPA ID: CAR000272377
Shipment Date: 2018-01-27
Manifest Number: 010869449FLE
Line Number: 1
Method Code: H141
Quantity Tons: 0.00050
Quantity Waste: 1.000000
Quantity Unit: P
Number of Containers: 1
Type of Container: NULL
Quantity Type: NULL
State Code: 311

Additional Info:
Year: 2017
Gen EPA ID: CAR000272377

Shipment Date: 20171107
Creation Date: 9/28/2018 18:30:12
Receipt Date: 20171213
Manifest ID: 010177266FLE
Trans EPA ID: MNS000110924
Trans Name: STERICYCLE SPECIALTY WASTE SOLUTIONS INC
Trans 2 EPA ID: NED986382133
Trans 2 Name: SMITH SYSTEMS
TSDF EPA ID: INR000110197
Trans Name: STERICYCLE INC
TSDF Alt EPA ID: Not reported

CVS PHARMACY #17694 (Continued) **S121781015**

TSDF Alt Name:	Not reported
Waste Code Description:	311 - Pharmaceutical waste
RCRA Code:	U034
Meth Code:	H141 - Storage, Bulking, And/Or Transfer Off Site--No Treatment/Reovery (H010-H129) Or (H131-H135)
Quantity Tons:	0.0005
Waste Quantity:	1
Quantity Unit:	P
Additional Code 1:	Not reported
Additional Code 2:	Not reported
Additional Code 3:	Not reported
Additional Code 4:	Not reported
Additional Code 5:	Not reported
Shipment Date:	20171107
Creation Date:	10/16/2018 18:31:15
Receipt Date:	20171204
Manifest ID:	010177267FLE
Trans EPA ID:	MNS000110924
Trans Name:	STERICYCLE SPECIALTY WASTE SOLUTIONS INC
Trans 2 EPA ID:	NED986382133
Trans 2 Name:	SMITH SYSTEMS
TSDF EPA ID:	NVD980895338
Trans Name:	21ST CENTURY EMN LLC
TSDF Alt EPA ID:	Not reported
TSDF Alt Name:	Not reported
Waste Code Description:	311 - Pharmaceutical waste
RCRA Code:	D010
Meth Code:	H141 - Storage, Bulking, And/Or Transfer Off Site--No Treatment/Reovery (H010-H129) Or (H131-H135)
Quantity Tons:	0.0005
Waste Quantity:	1
Quantity Unit:	P
Additional Code 1:	D007
Additional Code 2:	Not reported
Additional Code 3:	Not reported
Additional Code 4:	Not reported
Additional Code 5:	Not reported
Shipment Date:	20170817
Creation Date:	8/3/2018 18:30:33
Receipt Date:	20170907
Manifest ID:	010176958FLE
Trans EPA ID:	MNS000110924
Trans Name:	STERICYCLE SPECIALTY WASTE SOLUTIONS INC
Trans 2 EPA ID:	NED986382133
Trans 2 Name:	SMITH SYSTEMS
TSDF EPA ID:	NVD980895338
Trans Name:	21ST CENTURY EMN LLC
TSDF Alt EPA ID:	Not reported
TSDF Alt Name:	Not reported
Waste Code Description:	311 - Pharmaceutical waste
RCRA Code:	D010
Meth Code:	H141 - Storage, Bulking, And/Or Transfer Off Site--No Treatment/Reovery (H010-H129) Or (H131-H135)
Quantity Tons:	0.001
Waste Quantity:	2

CVS PHARMACY #17694 (Continued) **S121781015**

Quantity Unit:	P
Additional Code 1:	D007
Additional Code 2:	Not reported
Additional Code 3:	Not reported
Additional Code 4:	Not reported
Additional Code 5:	Not reported
Shipment Date:	20170817
Creation Date:	8/3/2018 18:30:33
Receipt Date:	20170913
Manifest ID:	010176957FLE
Trans EPA ID:	MNS000110924
Trans Name:	STERICYCLE SPECIALTY WASTE SOLUTIONS INC
Trans 2 EPA ID:	Not reported
Trans 2 Name:	Not reported
TSDF EPA ID:	INR000110197
Trans Name:	STERICYCLE INC
TSDF Alt EPA ID:	Not reported
TSDF Alt Name:	Not reported
Waste Code Description:	311 - Pharmaceutical waste
RCRA Code:	U034
Meth Code:	H141 - Storage, Bulking, And/Or Transfer Off Site--No Treatment/Reovery (H010-H129) Or (H131-H135)
Quantity Tons:	0.0005
Waste Quantity:	1
Quantity Unit:	P
Additional Code 1:	Not reported
Additional Code 2:	Not reported
Additional Code 3:	Not reported
Additional Code 4:	Not reported
Additional Code 5:	Not reported
Shipment Date:	20170817
Creation Date:	8/3/2018 18:30:33
Receipt Date:	20170907
Manifest ID:	010176958FLE
Trans EPA ID:	MNS000110924
Trans Name:	STERICYCLE SPECIALTY WASTE SOLUTIONS INC
Trans 2 EPA ID:	NED986382133
Trans 2 Name:	SMITH SYSTEMS
TSDF EPA ID:	NVD980895338
Trans Name:	21ST CENTURY EMN LLC
TSDF Alt EPA ID:	Not reported
TSDF Alt Name:	Not reported
Waste Code Description:	311 - Pharmaceutical waste
RCRA Code:	P001
Meth Code:	H141 - Storage, Bulking, And/Or Transfer Off Site--No Treatment/Reovery (H010-H129) Or (H131-H135)
Quantity Tons:	0.0005
Waste Quantity:	1
Quantity Unit:	P
Additional Code 1:	Not reported
Additional Code 2:	Not reported
Additional Code 3:	Not reported
Additional Code 4:	Not reported
Additional Code 5:	Not reported

CVS PHARMACY #17694 (Continued) **S121781015**

HWTS:

Name:	CVS PHARMACY #17694
Address:	180 DONAHUE ST STE B
Address 2:	Not reported
City,State,Zip:	SAUSALITO, CA 94965
EPA ID:	CAR000272377
Inactive Date:	Not reported
Create Date:	05/11/2017
Last Act Date:	Not reported
Mailing Name:	Not reported
Mailing Address:	1 CVS DR MC2340
Mailing Address 2:	Not reported
Mailing City,State,Zip:	WOONSOCKET, RI 2895
Owner Name:	LONGS DRUG STORES CALIFORNIA LLC
Owner Address:	1 CVS DR MC 2340
Owner Address 2:	Not reported
Owner City,State,Zip:	WOONSOCKET, RI 2895
Contact Name:	NICOLE WILKINSON
Contact Address:	1 CVS DRIVE
Contact Address 2:	Not reported
City,State,Zip:	WOONSOCKET, RI 28956146
Facility Status:	Active
Facility Type:	PERMANENT
Category:	FEDERAL
Latitude:	37.873845
Longitude:	-122.511051

NAICS:

EPA ID:	CAR000272377
Create Date:	2017-05-11 16:45:18.727
NAICS Code:	99999
NAICS Description:	Not Otherwise Specified
Issued EPA ID Date:	2017-05-11 16:45:18.72700
Inactive Date:	Not reported
Facility Name:	CVS PHARMACY #17694
Facility Address:	180 DONAHUE ST STE B
Facility Address 2:	Not reported
Facility City:	SAUSALITO
Facility County:	Not reported
Facility State:	CA
Facility Zip:	94965

E21 **ROSS DRESS FOR LESS #0365** **CERS HAZ WASTE** **S118937706**
East **194 DONAHUE ST** **HAZNET** **N/A**
< 1/8 **SAUSALITO, CA 94965** **HWTS**
0.111 mi.
586 ft. **Site 1 of 2 in cluster E**

Relative:
Lower

Actual:
37 ft.

CERS HAZ WASTE:

Name:	ROSS DRESS FOR LESS #0365
Address:	194 DONAHUE ST
City,State,Zip:	SAUSALITO, CA 94965
Site ID:	62937
CERS ID:	10506610
CERS Description:	Hazardous Waste Generator

Evaluation:

ROSS DRESS FOR LESS #0365 (Continued) **S118937706**

Eval General Type: Compliance Evaluation Inspection
Eval Date: 02-01-2018
Violations Found: No
Eval Type: Routine done by local agency
Eval Notes: Not reported
Eval Division: Marin County Dept of Public Works, Waste Mgmt, CUP
Eval Program: HW
Eval Source: CERS,

Eval General Type: Compliance Evaluation Inspection
Eval Date: 01-05-2015
Violations Found: No
Eval Type: Routine done by local agency
Eval Notes: Not reported
Eval Division: Marin County Dept of Public Works, Waste Mgmt, CUP
Eval Program: HW
Eval Source: CERS,

Coordinates:
Site ID: 62937
Facility Name: Ross Dress For Less #0365
Env Int Type Code: HWG
Program ID: 10506610
Coord Name: Not reported
Ref Point Type Desc: Center of a facility or station.,
Latitude: 37.873240
Longitude: -122.511830

Affiliation:
Affiliation Type Desc: CUPA District
Entity Name: Marin County CUPA
Entity Title: Not reported
Affiliation Address: 1600 Los GamosSuite 210
Affiliation City: San Rafael
Affiliation State: CA
Affiliation Country: Not reported
Affiliation Zip: 94903
Affiliation Phone: (415) 473-6647,

Affiliation Type Desc: Environmental Contact
Entity Name: Retail Specialist
Entity Title: Not reported
Affiliation Address: 101 Philip Dr
Affiliation City: Norwell
Affiliation State: MA
Affiliation Country: Not reported
Affiliation Zip: 02061
Affiliation Phone: ,

Affiliation Type Desc: Legal Owner
Entity Name: Ross Dress For Less Inc.
Entity Title: Not reported
Affiliation Address: 5130 Hacienda Dr
Affiliation City: Dublin
Affiliation State: CA
Affiliation Country: United States

ROSS DRESS FOR LESS #0365 (Continued) **S118937706**

Affiliation Zip:	94568-7579
Affiliation Phone:	(925) 965-4831,
Affiliation Type Desc:	Parent Corporation
Entity Name:	Ross Stores, Inc.
Entity Title:	Not reported
Affiliation Address:	Not reported
Affiliation City:	Not reported
Affiliation State:	Not reported
Affiliation Country:	Not reported
Affiliation Zip:	Not reported
Affiliation Phone:	,
Affiliation Type Desc:	Document Preparer
Entity Name:	Theresa Feeney
Entity Title:	Not reported
Affiliation Address:	Not reported
Affiliation City:	Not reported
Affiliation State:	Not reported
Affiliation Country:	Not reported
Affiliation Zip:	Not reported
Affiliation Phone:	,
Affiliation Type Desc:	Operator
Entity Name:	Ross Dress For Less Inc.
Entity Title:	Not reported
Affiliation Address:	Not reported
Affiliation City:	Not reported
Affiliation State:	Not reported
Affiliation Country:	Not reported
Affiliation Zip:	Not reported
Affiliation Phone:	(925) 965-4831,
Affiliation Type Desc:	Facility Mailing Address
Entity Name:	Mailing Address
Entity Title:	Not reported
Affiliation Address:	5130 Hacienda Dr
Affiliation City:	Dublin
Affiliation State:	CA
Affiliation Country:	Not reported
Affiliation Zip:	94568-7579
Affiliation Phone:	,
Affiliation Type Desc:	Identification Signer
Entity Name:	Theresa Feeney
Entity Title:	Retail Program Specialist
Affiliation Address:	Not reported
Affiliation City:	Not reported
Affiliation State:	Not reported
Affiliation Country:	Not reported
Affiliation Zip:	Not reported
Affiliation Phone:	,

HAZNET:

Name:	ROSS DRESS FOR LESS #0365
Address:	194 DONAHUE ST

ROSS DRESS FOR LESS #0365 (Continued) **S118937706**

Address 2:	Not reported
City,State,Zip:	SAUSALITO, CA 949651250
Contact:	KATHY HATCH
Telephone:	9259654015
Mailing Name:	Not reported
Mailing Address:	5130 HACIENDA DR
Year:	2021
Gepaid:	CAL000397452
TSD EPA ID:	CAD059494310
CA Waste Code:	343 - Unspecified organic liquid mixture
Disposal Method:	H141 - Storage, Bulking, And/Or Transfer Off Site--No Treatment/Reovery (H010-H129) Or (H131-H135)
Tons:	0.1095
Year:	2021
Gepaid:	CAL000397452
TSD EPA ID:	UTD981552177
CA Waste Code:	331 - Off-specification, aged or surplus organics
Disposal Method:	H040 - Incineration--Thermal Destruction Other Than Use As A Fuel
Tons:	0.015
Year:	2021
Gepaid:	CAL000397452
TSD EPA ID:	UTD981552177
CA Waste Code:	331 - Off-specification, aged or surplus organics
Disposal Method:	H141 - Storage, Bulking, And/Or Transfer Off Site--No Treatment/Reovery (H010-H129) Or (H131-H135)
Tons:	0.0315
Year:	2020
Gepaid:	CAL000397452
TSD EPA ID:	UTD981552177
CA Waste Code:	331 - Off-specification, aged or surplus organics
Disposal Method:	H141 - Storage, Bulking, And/Or Transfer Off Site--No Treatment/Reovery (H010-H129) Or (H131-H135)
Tons:	0.062
Year:	2020
Gepaid:	CAL000397452
TSD EPA ID:	AZR000515924
CA Waste Code:	331 - Off-specification, aged or surplus organics
Disposal Method:	H141 - Storage, Bulking, And/Or Transfer Off Site--No Treatment/Reovery (H010-H129) Or (H131-H135)
Tons:	0.04
Year:	2020
Gepaid:	CAL000397452
TSD EPA ID:	NED981723513
CA Waste Code:	331 - Off-specification, aged or surplus organics
Disposal Method:	H040 - Incineration--Thermal Destruction Other Than Use As A Fuel
Tons:	0.0365
Year:	2020
Gepaid:	CAL000397452
TSD EPA ID:	NED981723513
CA Waste Code:	181 - Other inorganic solid waste

ROSS DRESS FOR LESS #0365 (Continued) **S118937706**

Disposal Method:	H141 - Storage, Bulking, And/Or Transfer Off Site--No Treatment/Reovery (H010-H129) Or (H131-H135)
Tons:	0.001
Year:	2020
Gepaid:	CAL000397452
TSD EPA ID:	NVD980895338
CA Waste Code:	331 - Off-specification, aged or surplus organics
Disposal Method:	H141 - Storage, Bulking, And/Or Transfer Off Site--No Treatment/Reovery (H010-H129) Or (H131-H135)
Tons:	0.006
Year:	2020
Gepaid:	CAL000397452
TSD EPA ID:	NED981723513
CA Waste Code:	331 - Off-specification, aged or surplus organics
Disposal Method:	H141 - Storage, Bulking, And/Or Transfer Off Site--No Treatment/Reovery (H010-H129) Or (H131-H135)
Tons:	0.0015
Year:	2019
Gepaid:	CAL000397452
TSD EPA ID:	CAD008364432
CA Waste Code:	331 - Off-specification, aged or surplus organics
Disposal Method:	H141 - Storage, Bulking, And/Or Transfer Off Site--No Treatment/Reovery (H010-H129) Or (H131-H135)
Tons:	0.19100

Click this hyperlink while viewing on your computer to access
7 additional CA HAZNET: record(s) in the EDR Site Report.

Detail Two:

Year:	2020
EM Manifest ID:	f845fe77-45ca-4dea-8019-167fb30fe4fa
Shipment Date:	8/11/2020
Receipt Date:	8/31/2020
Manifest Number:	014550831FLE
Generator EPA ID:	CAL000397452
Name:	ROSS STORES 365
Address:	194 DONAHUE ST.
Address 2:	Not reported
City:	SAUSALITO
Zip:	94965
Telephone:	800-483-3718
Contact:	Manager Store
Contact Telephone:	415-332-0519
Transporter 1 EPA ID:	MAD039322250
Transporter 1 Emergency Number:	Not reported
Transporter 2 EPA ID:	MAD039322250
Transporter 2 Emergency Number:	Not reported
TSDF EPA ID:	UTD981552177
TSDF Name:	Clean Harbors Aragonite LLC
TSDF Address 1:	11600 North Aptus Road
TSDF Address 2:	Not reported
TSDF City:	Grantsville
TSDF Zip:	84029

ROSS DRESS FOR LESS #0365 (Continued) **S118937706**

TSDF Telephone: 800-483-3718

State:
Year: 2020
EM Manifest ID: f845fe77-45ca-4dea-8019-167fb30fe4fa
Generator EPA ID: CAL000397452
Shipment Date: 2020-08-11
Manifest Number: 014550831FLE
Line Number: 1
Method Code: H141
Quantity Tons: 0.02900
Quantity Waste: 58.000000
Quantity Unit: P
Number of Containers: 1
Type of Container: Fiber or plastic boxes, cartons, cases
Quantity Type: Pounds
State Code: 331

Year: 2020
EM Manifest ID: 1bb2515c-40c3-4529-aa1c-ec6eedbf4098
Shipment Date: 3/6/2020
Receipt Date: 3/19/2020
Manifest Number: 002697460PSC
Generator EPA ID: CAL000397452
Name: ROSS DRESS FOR LESS #0365
Address: 194 DONAHUE ST
Address 2: Not reported
City: SAUSALITO
Zip: 94965-1250
Telephone: 877-577-2669
Contact: Not reported
Contact Telephone: 415-372-0519
Transporter 1 EPA ID: MNS000110924
Transporter 1 Emergency Number: Not reported
Transporter 2 EPA ID: CAR000175422
Transporter 2 Emergency Number: Not reported
TSDF EPA ID: AZR000515924
TSDF Name: YUMA YES WASTE TRANSFER FACILITY
TSDF Address 1: 2730 E 13TH ST
TSDF Address 2: Not reported
TSDF City: YUMA
TSDF Zip: 85365-1901
TSDF Telephone: Not reported

State:
Year: 2020
EM Manifest ID: 1bb2515c-40c3-4529-aa1c-ec6eedbf4098
Generator EPA ID: CAL000397452
Shipment Date: 2020-03-06
Manifest Number: 002697460PSC
Line Number: 1
Method Code: H141
Quantity Tons: 0.04000
Quantity Waste: 80.000000
Quantity Unit: P
Number of Containers: 1
Type of Container: Metal drums, barrels, kegs

ROSS DRESS FOR LESS #0365 (Continued) **S118937706**

Quantity Type:	Pounds
State Code:	331
Year:	2020
EM Manifest ID:	917238
Shipment Date:	11/11/2019
Receipt Date:	12/3/2019
Manifest Number:	002573301PSC
Generator EPA ID:	CAL000397452
Name:	ROSS STORE #0365
Address:	194 DONAHUE ST
Address 2:	Not reported
City:	SAUSALITO
Zip:	94965
Telephone:	877-577-2669
Contact:	Not reported
Contact Telephone:	323-776-6233
Transporter 1 EPA ID:	MNS000110924
Transporter 1 Emergency Number:	Not reported
Transporter 2 EPA ID:	MOD095038998
Transporter 2 Emergency Number:	Not reported
TSDF EPA ID:	CAD008364432
TSDF Name:	Rho Chem LLC
TSDF Address 1:	425 Isis Ave.
TSDF Address 2:	Not reported
TSDF City:	Inglewood
TSDF Zip:	90301
TSDF Telephone:	Not reported

Federal:

Year:	2020
EM Manifest ID:	917238
Generator EPA ID:	CAL000397452
Shipment Date:	2019-11-11
Manifest Number:	002573301PSC
Line Number:	1
Method Code:	H141
Quantity Tons:	0.00900
Quantity Waste:	18.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	Fiberboard or plastic drums, barrels, kegs
Quantity Type:	Pounds
Federal Code:	D006
Year:	2020
EM Manifest ID:	917238
Generator EPA ID:	CAL000397452
Shipment Date:	2019-11-11
Manifest Number:	002573301PSC
Line Number:	1
Method Code:	H141
Quantity Tons:	0.00900
Quantity Waste:	18.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	Fiberboard or plastic drums, barrels, kegs

ROSS DRESS FOR LESS #0365 (Continued) **S118937706**

Quantity Type:	Pounds
Federal Code:	D008
Year:	2020
EM Manifest ID:	917238
Generator EPA ID:	CAL000397452
Shipment Date:	2019-11-11
Manifest Number:	002573301PSC
Line Number:	1
Method Code:	H141
Quantity Tons:	0.00900
Quantity Waste:	18.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	Fiberboard or plastic drums, barrels, kegs
Quantity Type:	Pounds
Federal Code:	D011
Year:	2020
EM Manifest ID:	917238
Generator EPA ID:	CAL000397452
Shipment Date:	2019-11-11
Manifest Number:	002573301PSC
Line Number:	1
Method Code:	H141
Quantity Tons:	0.00900
Quantity Waste:	18.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	Fiberboard or plastic drums, barrels, kegs
Quantity Type:	Pounds
Federal Code:	D016
Year:	2020
EM Manifest ID:	8dfee65d-8606-427a-8a8c-079f5f77f208
Shipment Date:	10/8/2020
Receipt Date:	10/29/2020
Manifest Number:	015170217FLE
Generator EPA ID:	CAL000397452
Name:	ROSS STORES 365
Address:	194 DONAHUE ST.
Address 2:	Not reported
City:	SAUSALITO
Zip:	94965
Telephone:	800-483-3718
Contact:	Manager Store
Contact Telephone:	415-332-0519
Transporter 1 EPA ID:	MAD039322250
Transporter 1 Emergency Number:	Not reported
Transporter 2 EPA ID:	MAD039322250
Transporter 2 Emergency Number:	Not reported
TSDF EPA ID:	NED981723513
TSDF Name:	Clean Harbors Environmental Services, Inc.
TSDF Address 1:	2247 South Highway 71
TSDF Address 2:	Not reported
TSDF City:	Kimball

ROSS DRESS FOR LESS #0365 (Continued) **S118937706**

TSDF Zip: 69145
TSDF Telephone: 800-483-3718

Federal:
Year: 2020
EM Manifest ID: 8dfee65d-8606-427a-8a8c-079f5f77f208
Generator EPA ID: CAL000397452
Shipment Date: 2020-10-08
Manifest Number: 015170217FLE
Line Number: 1
Method Code: H141
Quantity Tons: 0.00150
Quantity Waste: 3.000000
Quantity Unit: P
Number of Containers: 1
Type of Container: Fiberboard or plastic drums, barrels, kegs
Quantity Type: Pounds
Federal Code: D001

Year: 2020
EM Manifest ID: 8dfee65d-8606-427a-8a8c-079f5f77f208
Generator EPA ID: CAL000397452
Shipment Date: 2020-10-08
Manifest Number: 015170217FLE
Line Number: 1
Method Code: H141
Quantity Tons: 0.00150
Quantity Waste: 3.000000
Quantity Unit: P
Number of Containers: 1
Type of Container: Fiberboard or plastic drums, barrels, kegs
Quantity Type: Pounds
Federal Code: D035

Year: 2020
EM Manifest ID: 8dfee65d-8606-427a-8a8c-079f5f77f208
Generator EPA ID: CAL000397452
Shipment Date: 2020-10-08
Manifest Number: 015170217FLE
Line Number: 2
Method Code: H141
Quantity Tons: 0.00100
Quantity Waste: 2.000000
Quantity Unit: P
Number of Containers: 1
Type of Container: Fiberboard or plastic drums, barrels, kegs
Quantity Type: Pounds
Federal Code: D009

State:
Year: 2020
EM Manifest ID: 8dfee65d-8606-427a-8a8c-079f5f77f208
Generator EPA ID: CAL000397452
Shipment Date: 2020-10-08
Manifest Number: 015170217FLE
Line Number: 1
Method Code: H141

ROSS DRESS FOR LESS #0365 (Continued) **S118937706**

Quantity Tons:	0.00150
Quantity Waste:	3.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	Fiberboard or plastic drums, barrels, kegs
Quantity Type:	Pounds
State Code:	331

Year:	2020
EM Manifest ID:	8dfee65d-8606-427a-8a8c-079f5f77f208
Generator EPA ID:	CAL000397452
Shipment Date:	2020-10-08
Manifest Number:	015170217FLE
Line Number:	2
Method Code:	H141
Quantity Tons:	0.00100
Quantity Waste:	2.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	Fiberboard or plastic drums, barrels, kegs
Quantity Type:	Pounds
State Code:	181

Year:	2020
EM Manifest ID:	8dfee65d-8606-427a-8a8c-079f5f77f208
Generator EPA ID:	CAL000397452
Shipment Date:	2020-10-08
Manifest Number:	015170217FLE
Line Number:	3
Method Code:	H040
Quantity Tons:	0.03650
Quantity Waste:	73.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	Fiber or plastic boxes, cartons, cases
Quantity Type:	Pounds
State Code:	331

Year:	2020
EM Manifest ID:	928365
Shipment Date:	10/24/2019
Receipt Date:	11/6/2019
Manifest Number:	002543502PSC
Generator EPA ID:	CAL000397452
Name:	ROSS STORE #0365
Address:	194 DONAHUE ST
Address 2:	Not reported
City:	SAUSALITO
Zip:	94965
Telephone:	877-577-2669
Contact:	Not reported
Contact Telephone:	323-776-6233
Transporter 1 EPA ID:	MNS000110924
Transporter 1 Emergency Number:	Not reported
Transporter 2 EPA ID:	MOD095038998
Transporter 2 Emergency Number:	Not reported

ROSS DRESS FOR LESS #0365 (Continued) **S118937706**

TSDF EPA ID: CAD008364432
TSDF Name: Rho Chem LLC
TSDF Address 1: 425 Isis Ave.
TSDF Address 2: Not reported
TSDF City: Inglewood
TSDF Zip: 90301
TSDF Telephone: Not reported

Federal:
Year: 2020
EM Manifest ID: 928365
Generator EPA ID: CAL000397452
Shipment Date: 2019-10-24
Manifest Number: 002543502PSC
Line Number: 1
Method Code: H141
Quantity Tons: 0.02500
Quantity Waste: 50.000000
Quantity Unit: P
Number of Containers: 1
Type of Container: Fiberboard or plastic drums, barrels, kegs
Quantity Type: Pounds
Federal Code: D006

Year: 2020
EM Manifest ID: 928365
Generator EPA ID: CAL000397452
Shipment Date: 2019-10-24
Manifest Number: 002543502PSC
Line Number: 1
Method Code: H141
Quantity Tons: 0.02500
Quantity Waste: 50.000000
Quantity Unit: P
Number of Containers: 1
Type of Container: Fiberboard or plastic drums, barrels, kegs
Quantity Type: Pounds
Federal Code: D008

Year: 2020
EM Manifest ID: 928365
Generator EPA ID: CAL000397452
Shipment Date: 2019-10-24
Manifest Number: 002543502PSC
Line Number: 1
Method Code: H141
Quantity Tons: 0.02500
Quantity Waste: 50.000000
Quantity Unit: P
Number of Containers: 1
Type of Container: Fiberboard or plastic drums, barrels, kegs
Quantity Type: Pounds
Federal Code: D011

Year: 2020
EM Manifest ID: 928365
Generator EPA ID: CAL000397452
Shipment Date: 2019-10-24

ROSS DRESS FOR LESS #0365 (Continued) **S118937706**

Manifest Number:	002543502PSC
Line Number:	1
Method Code:	H141
Quantity Tons:	0.02500
Quantity Waste:	50.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	Fiberboard or plastic drums, barrels, kegs
Quantity Type:	Pounds
Federal Code:	D016

Year:	2020
EM Manifest ID:	928365
Generator EPA ID:	CAL000397452
Shipment Date:	2019-10-24
Manifest Number:	002543502PSC
Line Number:	3
Method Code:	H141
Quantity Tons:	0.01150
Quantity Waste:	23.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	Fiberboard or plastic drums, barrels, kegs
Quantity Type:	Pounds
Federal Code:	D001

State:

Year:	2020
EM Manifest ID:	928365
Generator EPA ID:	CAL000397452
Shipment Date:	2019-10-24
Manifest Number:	002543502PSC
Line Number:	1
Method Code:	H141
Quantity Tons:	0.02500
Quantity Waste:	50.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	Fiberboard or plastic drums, barrels, kegs
Quantity Type:	Pounds
State Code:	331

Year:	2020
EM Manifest ID:	928365
Generator EPA ID:	CAL000397452
Shipment Date:	2019-10-24
Manifest Number:	002543502PSC
Line Number:	3
Method Code:	H141
Quantity Tons:	0.01150
Quantity Waste:	23.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	Fiberboard or plastic drums, barrels, kegs
Quantity Type:	Pounds
State Code:	331

ROSS DRESS FOR LESS #0365 (Continued) **S118937706**

Detail Two:

Year:	2019
EM Manifest ID:	463819
Shipment Date:	6/24/2019
Receipt Date:	7/3/2019
Manifest Number:	002378254PSC
Generator EPA ID:	CAL000397452
Name:	ROSS STORE #0365
Address:	194 DONAHUE ST
Address 2:	Not reported
City:	SAUSALITO
Zip:	94965
Telephone:	877-577-2669
Contact:	Not reported
Contact Telephone:	323-776-6233
Transporter 1 EPA ID:	MOD095038998
Transporter 1 Emergency Number:	Not reported
Transporter 2 EPA ID:	MNS000110924
Transporter 2 Emergency Number:	Not reported
TSDF EPA ID:	CAD008364432
TSDF Name:	Rho Chem LLC
TSDF Address 1:	425 Isis Ave.
TSDF Address 2:	Not reported
TSDF City:	Inglewood
TSDF Zip:	90301
TSDF Telephone:	Not reported

Federal:

Year:	2019
EM Manifest ID:	463819
Generator EPA ID:	CAL000397452
Shipment Date:	2019-06-24
Manifest Number:	002378254PSC
Line Number:	1
Method Code:	H141
Quantity Tons:	0.00650
Quantity Waste:	13.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	Fiberboard or plastic drums, barrels, kegs
Quantity Type:	Pounds
Federal Code:	D006

Year:	2019
EM Manifest ID:	463819
Generator EPA ID:	CAL000397452
Shipment Date:	2019-06-24
Manifest Number:	002378254PSC
Line Number:	1
Method Code:	H141
Quantity Tons:	0.00650
Quantity Waste:	13.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	Fiberboard or plastic drums, barrels, kegs
Quantity Type:	Pounds
Federal Code:	D008

ROSS DRESS FOR LESS #0365 (Continued) **S118937706**

Year:	2019
EM Manifest ID:	463819
Generator EPA ID:	CAL000397452
Shipment Date:	2019-06-24
Manifest Number:	002378254PSC
Line Number:	1
Method Code:	H141
Quantity Tons:	0.00650
Quantity Waste:	13.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	Fiberboard or plastic drums, barrels, kegs
Quantity Type:	Pounds
Federal Code:	D011

Year:	2019
EM Manifest ID:	463819
Generator EPA ID:	CAL000397452
Shipment Date:	2019-06-24
Manifest Number:	002378254PSC
Line Number:	1
Method Code:	H141
Quantity Tons:	0.00650
Quantity Waste:	13.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	Fiberboard or plastic drums, barrels, kegs
Quantity Type:	Pounds
Federal Code:	D016

Year:	2019
EM Manifest ID:	463819
Generator EPA ID:	CAL000397452
Shipment Date:	2019-06-24
Manifest Number:	002378254PSC
Line Number:	3
Method Code:	H141
Quantity Tons:	0.00250
Quantity Waste:	5.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	Fiberboard or plastic drums, barrels, kegs
Quantity Type:	Pounds
Federal Code:	D001

Year:	2019
EM Manifest ID:	463819
Generator EPA ID:	CAL000397452
Shipment Date:	2019-06-24
Manifest Number:	002378254PSC
Line Number:	6
Method Code:	H141
Quantity Tons:	0.00500
Quantity Waste:	10.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	Fiberboard or plastic drums, barrels, kegs

ROSS DRESS FOR LESS #0365 (Continued) **S118937706**

Quantity Type: Pounds
Federal Code: D001

State:
Year: 2019
EM Manifest ID: 463819
Generator EPA ID: CAL000397452
Shipment Date: 2019-06-24
Manifest Number: 002378254PSC
Line Number: 1
Method Code: H141
Quantity Tons: 0.00650
Quantity Waste: 13.000000
Quantity Unit: P
Number of Containers: 1
Type of Container: Fiberboard or plastic drums, barrels, kegs
Quantity Type: Pounds
State Code: 331

Year: 2019
EM Manifest ID: 463819
Generator EPA ID: CAL000397452
Shipment Date: 2019-06-24
Manifest Number: 002378254PSC
Line Number: 3
Method Code: H141
Quantity Tons: 0.00250
Quantity Waste: 5.000000
Quantity Unit: P
Number of Containers: 1
Type of Container: Fiberboard or plastic drums, barrels, kegs
Quantity Type: Pounds
State Code: 331

Year: 2019
EM Manifest ID: 463819
Generator EPA ID: CAL000397452
Shipment Date: 2019-06-24
Manifest Number: 002378254PSC
Line Number: 6
Method Code: H141
Quantity Tons: 0.00500
Quantity Waste: 10.000000
Quantity Unit: P
Number of Containers: 1
Type of Container: Fiberboard or plastic drums, barrels, kegs
Quantity Type: Pounds
State Code: 331

Year: 2019
EM Manifest ID: 434252
Shipment Date: 6/11/2019
Receipt Date: 6/18/2019
Manifest Number: 002151297PSC
Generator EPA ID: CAL000397452
Name: ROSS STORE #0365

ROSS DRESS FOR LESS #0365 (Continued) **S118937706**

Address:	194 DONAHUE ST
Address 2:	Not reported
City:	SAUSALITO
Zip:	94965
Telephone:	877-577-2669
Contact:	Not reported
Contact Telephone:	323-776-6233
Transporter 1 EPA ID:	MNS000110924
Transporter 1 Emergency Number:	Not reported
Transporter 2 EPA ID:	MOD095038998
Transporter 2 Emergency Number:	Not reported
TSDF EPA ID:	CAD008364432
TSDF Name:	Rho Chem LLC
TSDF Address 1:	425 Isis Ave.
TSDF Address 2:	Not reported
TSDF City:	Inglewood
TSDF Zip:	90301
TSDF Telephone:	Not reported

Federal:

Year:	2019
EM Manifest ID:	434252
Generator EPA ID:	CAL000397452
Shipment Date:	2019-06-11
Manifest Number:	002151297PSC
Line Number:	1
Method Code:	H141
Quantity Tons:	0.04600
Quantity Waste:	92.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	Fiberboard or plastic drums, barrels, kegs
Quantity Type:	Pounds
Federal Code:	D006

Year:	2019
EM Manifest ID:	434252
Generator EPA ID:	CAL000397452
Shipment Date:	2019-06-11
Manifest Number:	002151297PSC
Line Number:	1
Method Code:	H141
Quantity Tons:	0.04600
Quantity Waste:	92.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	Fiberboard or plastic drums, barrels, kegs
Quantity Type:	Pounds
Federal Code:	D008

Year:	2019
EM Manifest ID:	434252
Generator EPA ID:	CAL000397452
Shipment Date:	2019-06-11
Manifest Number:	002151297PSC
Line Number:	1
Method Code:	H141
Quantity Tons:	0.04600

ROSS DRESS FOR LESS #0365 (Continued) **S118937706**

Quantity Waste: 92.000000
Quantity Unit: P
Number of Containers: 1
Type of Container: Fiberboard or plastic drums, barrels, kegs
Quantity Type: Pounds
Federal Code: D011

Year: 2019
EM Manifest ID: 434252
Generator EPA ID: CAL000397452
Shipment Date: 2019-06-11
Manifest Number: 002151297PSC
Line Number: 1
Method Code: H141
Quantity Tons: 0.04600
Quantity Waste: 92.000000
Quantity Unit: P
Number of Containers: 1
Type of Container: Fiberboard or plastic drums, barrels, kegs
Quantity Type: Pounds
Federal Code: D016

Year: 2019
EM Manifest ID: 434252
Generator EPA ID: CAL000397452
Shipment Date: 2019-06-11
Manifest Number: 002151297PSC
Line Number: 2
Method Code: H141
Quantity Tons: 0.00350
Quantity Waste: 7.000000
Quantity Unit: P
Number of Containers: 1
Type of Container: Fiberboard or plastic drums, barrels, kegs
Quantity Type: Pounds
Federal Code: D001

State:

Year: 2019
EM Manifest ID: 434252
Generator EPA ID: CAL000397452
Shipment Date: 2019-06-11
Manifest Number: 002151297PSC
Line Number: 1
Method Code: H141
Quantity Tons: 0.04600
Quantity Waste: 92.000000
Quantity Unit: P
Number of Containers: 1
Type of Container: Fiberboard or plastic drums, barrels, kegs
Quantity Type: Pounds
State Code: 331

Year: 2019
EM Manifest ID: 434252
Generator EPA ID: CAL000397452
Shipment Date: 2019-06-11

ROSS DRESS FOR LESS #0365 (Continued) **S118937706**

Manifest Number:	002151297PSC
Line Number:	2
Method Code:	H141
Quantity Tons:	0.00350
Quantity Waste:	7.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	Fiberboard or plastic drums, barrels, kegs
Quantity Type:	Pounds
State Code:	331

Year:	2019
EM Manifest ID:	366548
Shipment Date:	4/17/2019
Receipt Date:	4/30/2019
Manifest Number:	002239922PSC
Generator EPA ID:	CAL000397452
Name:	ROSS STORE #0365
Address:	194 DONAHUE ST
Address 2:	Not reported
City:	SAUSALITO
Zip:	94965
Telephone:	877-577-2669
Contact:	Not reported
Contact Telephone:	323-776-6233
Transporter 1 EPA ID:	MNS000110924
Transporter 1 Emergency Number:	Not reported
Transporter 2 EPA ID:	MOD095038998
Transporter 2 Emergency Number:	Not reported
TSDF EPA ID:	CAD008364432
TSDF Name:	Rho Chem LLC
TSDF Address 1:	425 Isis Ave.
TSDF Address 2:	Not reported
TSDF City:	Inglewood
TSDF Zip:	90301
TSDF Telephone:	Not reported

Federal:

Year:	2019
EM Manifest ID:	366548
Generator EPA ID:	CAL000397452
Shipment Date:	2019-04-17
Manifest Number:	002239922PSC
Line Number:	1
Method Code:	H141
Quantity Tons:	0.04500
Quantity Waste:	90.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	Fiberboard or plastic drums, barrels, kegs
Quantity Type:	Pounds
Federal Code:	D006

Year:	2019
EM Manifest ID:	366548
Generator EPA ID:	CAL000397452
Shipment Date:	2019-04-17

ROSS DRESS FOR LESS #0365 (Continued) **S118937706**

Manifest Number:	002239922PSC
Line Number:	1
Method Code:	H141
Quantity Tons:	0.04500
Quantity Waste:	90.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	Fiberboard or plastic drums, barrels, kegs
Quantity Type:	Pounds
Federal Code:	D008

Year:	2019
EM Manifest ID:	366548
Generator EPA ID:	CAL000397452
Shipment Date:	2019-04-17
Manifest Number:	002239922PSC
Line Number:	1
Method Code:	H141
Quantity Tons:	0.04500
Quantity Waste:	90.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	Fiberboard or plastic drums, barrels, kegs
Quantity Type:	Pounds
Federal Code:	D011

Year:	2019
EM Manifest ID:	366548
Generator EPA ID:	CAL000397452
Shipment Date:	2019-04-17
Manifest Number:	002239922PSC
Line Number:	1
Method Code:	H141
Quantity Tons:	0.04500
Quantity Waste:	90.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	Fiberboard or plastic drums, barrels, kegs
Quantity Type:	Pounds
Federal Code:	D016

Year:	2019
EM Manifest ID:	366548
Generator EPA ID:	CAL000397452
Shipment Date:	2019-04-17
Manifest Number:	002239922PSC
Line Number:	2
Method Code:	H141
Quantity Tons:	0.00350
Quantity Waste:	7.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	Fiberboard or plastic drums, barrels, kegs
Quantity Type:	Pounds
Federal Code:	D001

ROSS DRESS FOR LESS #0365 (Continued) **S118937706**

State:

Year:	2019
EM Manifest ID:	366548
Generator EPA ID:	CAL000397452
Shipment Date:	2019-04-17
Manifest Number:	002239922PSC
Line Number:	1
Method Code:	H141
Quantity Tons:	0.04500
Quantity Waste:	90.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	Fiberboard or plastic drums, barrels, kegs
Quantity Type:	Pounds
State Code:	331

Year:	2019
EM Manifest ID:	366548
Generator EPA ID:	CAL000397452
Shipment Date:	2019-04-17
Manifest Number:	002239922PSC
Line Number:	2
Method Code:	H141
Quantity Tons:	0.00350
Quantity Waste:	7.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	Fiberboard or plastic drums, barrels, kegs
Quantity Type:	Pounds
State Code:	331

Year:	2019
EM Manifest ID:	1e86076e-dde8-4ef8-8ad6-d00c61921637
Shipment Date:	1/10/2019
Receipt Date:	1/24/2019
Manifest Number:	002094748PSC
Generator EPA ID:	CAL000397452
Name:	ROSS STORE #0365
Address:	194 DONAHUE ST
Address 2:	Not reported
City:	SAUSALITO
Zip:	94965
Telephone:	877-577-2669
Contact:	Not reported
Contact Telephone:	323-776-6233
Transporter 1 EPA ID:	MNS000110924
Transporter 1 Emergency Number:	Not reported
Transporter 2 EPA ID:	MOD095038998
Transporter 2 Emergency Number:	Not reported
TSDF EPA ID:	CAD008364432
TSDF Name:	Rho Chem LLC
TSDF Address 1:	425 Isis Ave.
TSDF Address 2:	Not reported
TSDF City:	Inglewood
TSDF Zip:	90301
TSDF Telephone:	Not reported

ROSS DRESS FOR LESS #0365 (Continued) **S118937706**

Federal:

Year:	2019
EM Manifest ID:	1e86076e-dde8-4ef8-8ad6-d00c61921637
Generator EPA ID:	CAL000397452
Shipment Date:	2019-01-10
Manifest Number:	002094748PSC
Line Number:	1
Method Code:	H141
Quantity Tons:	0.03650
Quantity Waste:	73.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	Fiberboard or plastic drums, barrels, kegs
Quantity Type:	Pounds
Federal Code:	D006

Year:	2019
EM Manifest ID:	1e86076e-dde8-4ef8-8ad6-d00c61921637
Generator EPA ID:	CAL000397452
Shipment Date:	2019-01-10
Manifest Number:	002094748PSC
Line Number:	1
Method Code:	H141
Quantity Tons:	0.03650
Quantity Waste:	73.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	Fiberboard or plastic drums, barrels, kegs
Quantity Type:	Pounds
Federal Code:	D008

Year:	2019
EM Manifest ID:	1e86076e-dde8-4ef8-8ad6-d00c61921637
Generator EPA ID:	CAL000397452
Shipment Date:	2019-01-10
Manifest Number:	002094748PSC
Line Number:	1
Method Code:	H141
Quantity Tons:	0.03650
Quantity Waste:	73.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	Fiberboard or plastic drums, barrels, kegs
Quantity Type:	Pounds
Federal Code:	D011

Year:	2019
EM Manifest ID:	1e86076e-dde8-4ef8-8ad6-d00c61921637
Generator EPA ID:	CAL000397452
Shipment Date:	2019-01-10
Manifest Number:	002094748PSC
Line Number:	1
Method Code:	H141
Quantity Tons:	0.03650
Quantity Waste:	73.000000
Quantity Unit:	P
Number of Containers:	1

ROSS DRESS FOR LESS #0365 (Continued) **S118937706**

Type of Container: Fiberboard or plastic drums, barrels, kegs
Quantity Type: Pounds
Federal Code: D016

Year: 2019
EM Manifest ID: 1e86076e-dde8-4ef8-8ad6-d00c61921637
Generator EPA ID: CAL000397452
Shipment Date: 2019-01-10
Manifest Number: 002094748PSC
Line Number: 2
Method Code: H141
Quantity Tons: 0.00400
Quantity Waste: 8.000000
Quantity Unit: P
Number of Containers: 1
Type of Container: Fiberboard or plastic drums, barrels, kegs
Quantity Type: Pounds
Federal Code: D001

Year: 2019
EM Manifest ID: 1e86076e-dde8-4ef8-8ad6-d00c61921637
Generator EPA ID: CAL000397452
Shipment Date: 2019-01-10
Manifest Number: 002094748PSC
Line Number: 3
Method Code: H141
Quantity Tons: 0.00300
Quantity Waste: 6.000000
Quantity Unit: P
Number of Containers: 1
Type of Container: Fiberboard or plastic drums, barrels, kegs
Quantity Type: Pounds
Federal Code: D001

State:
Year: 2019
EM Manifest ID: 1e86076e-dde8-4ef8-8ad6-d00c61921637
Generator EPA ID: CAL000397452
Shipment Date: 2019-01-10
Manifest Number: 002094748PSC
Line Number: 1
Method Code: H141
Quantity Tons: 0.03650
Quantity Waste: 73.000000
Quantity Unit: P
Number of Containers: 1
Type of Container: Fiberboard or plastic drums, barrels, kegs
Quantity Type: Pounds
State Code: 331

Year: 2019
EM Manifest ID: 1e86076e-dde8-4ef8-8ad6-d00c61921637
Generator EPA ID: CAL000397452
Shipment Date: 2019-01-10
Manifest Number: 002094748PSC
Line Number: 2
Method Code: H141

ROSS DRESS FOR LESS #0365 (Continued) **S118937706**

Quantity Tons:	0.00400
Quantity Waste:	8.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	Fiberboard or plastic drums, barrels, kegs
Quantity Type:	Pounds
State Code:	331

Year:	2019
EM Manifest ID:	1e86076e-dde8-4ef8-8ad6-d00c61921637
Generator EPA ID:	CAL000397452
Shipment Date:	2019-01-10
Manifest Number:	002094748PSC
Line Number:	3
Method Code:	H141
Quantity Tons:	0.00300
Quantity Waste:	6.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	Fiberboard or plastic drums, barrels, kegs
Quantity Type:	Pounds
State Code:	331

Detail Two:

Year:	2018
EM Manifest ID:	001541760PSC20170503_D_1
Shipment Date:	5/3/2017
Receipt Date:	1/1/1900
Manifest Number:	001541760PSC
Generator EPA ID:	CAL000397452
Name:	ROSS STORE #0365
Address:	Not reported
Address 2:	Not reported
City:	Not reported
Zip:	Not reported
Telephone:	Not reported
Contact:	Not reported
Contact Telephone:	Not reported
Transporter 1 EPA ID:	MNS000110924
Transporter 1 Emergency Number:	Not reported
Transporter 2 EPA ID:	NED986382133
Transporter 2 Emergency Number:	Not reported
TSDF EPA ID:	NVD980895338
TSDF Name:	21ST CENTURY ENVIRONMENTAL MANAGEMENT OF NEVADA LLC
TSDF Address 1:	Not reported
TSDF Address 2:	Not reported
TSDF City:	Not reported
TSDF Zip:	Not reported
TSDF Telephone:	Not reported

Federal:

Year:	2018
EM Manifest ID:	001541760PSC20170503_D_1
Generator EPA ID:	CAL000397452
Shipment Date:	2017-05-03
Manifest Number:	001541760PSC

ROSS DRESS FOR LESS #0365 (Continued) **S118937706**

Line Number: 1
Method Code: H141
Quantity Tons: 0.00250
Quantity Waste: 5.000000
Quantity Unit: P
Number of Containers: 1
Type of Container: NULL
Quantity Type: NULL
Federal Code: D001

Year: 2018
EM Manifest ID: 001541760PSC20170503_D_1
Generator EPA ID: CAL000397452
Shipment Date: 2017-05-03
Manifest Number: 001541760PSC
Line Number: 2
Method Code: H141
Quantity Tons: 0.00450
Quantity Waste: 9.000000
Quantity Unit: P
Number of Containers: 1
Type of Container: NULL
Quantity Type: NULL
Federal Code: D001

State:
Year: 2018
EM Manifest ID: 001541760PSC20170503_D_1
Generator EPA ID: CAL000397452
Shipment Date: 2017-05-03
Manifest Number: 001541760PSC
Line Number: 1
Method Code: H141
Quantity Tons: 0.00250
Quantity Waste: 5.000000
Quantity Unit: P
Number of Containers: 1
Type of Container: NULL
Quantity Type: NULL
State Code: 331

Year: 2018
EM Manifest ID: 001541760PSC20170503_D_1
Generator EPA ID: CAL000397452
Shipment Date: 2017-05-03
Manifest Number: 001541760PSC
Line Number: 2
Method Code: H141
Quantity Tons: 0.00450
Quantity Waste: 9.000000
Quantity Unit: P
Number of Containers: 1
Type of Container: NULL
Quantity Type: NULL
State Code: 331

Year: 2018

ROSS DRESS FOR LESS #0365 (Continued) **S118937706**

EM Manifest ID:	001541760PSC20170503_D_1
Generator EPA ID:	CAL000397452
Shipment Date:	2017-05-03
Manifest Number:	001541760PSC
Line Number:	3
Method Code:	H141
Quantity Tons:	0.04650
Quantity Waste:	93.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	NULL
Quantity Type:	NULL
State Code:	331

Year:	2018
EM Manifest ID:	001844757PSC20180502_D_1
Shipment Date:	5/2/2018
Receipt Date:	5/23/2018
Manifest Number:	001844757PSC
Generator EPA ID:	CAL000397452
Name:	ROSS STORE #0365
Address:	Not reported
Address 2:	Not reported
City:	Not reported
Zip:	Not reported
Telephone:	Not reported
Contact:	Not reported
Contact Telephone:	Not reported
Transporter 1 EPA ID:	MNS000110924
Transporter 1 Emergency Number:	Not reported
Transporter 2 EPA ID:	NED986382133
Transporter 2 Emergency Number:	Not reported
TSDF EPA ID:	CAD008364432
TSDF Name:	RHO CHEM LLC
TSDF Address 1:	Not reported
TSDF Address 2:	Not reported
TSDF City:	Not reported
TSDF Zip:	Not reported
TSDF Telephone:	Not reported

Federal:

Year:	2018
EM Manifest ID:	001844757PSC20180502_D_1
Generator EPA ID:	CAL000397452
Shipment Date:	2018-05-02
Manifest Number:	001844757PSC
Line Number:	1
Method Code:	H141
Quantity Tons:	0.00450
Quantity Waste:	9.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	NULL
Quantity Type:	NULL
Federal Code:	D001

Year:	2018

ROSS DRESS FOR LESS #0365 (Continued) **S118937706**

EM Manifest ID:	001844757PSC20180502_D_1
Generator EPA ID:	CAL000397452
Shipment Date:	2018-05-02
Manifest Number:	001844757PSC
Line Number:	2
Method Code:	H141
Quantity Tons:	0.00400
Quantity Waste:	8.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	NULL
Quantity Type:	NULL
Federal Code:	D001
Year:	2018
EM Manifest ID:	001844757PSC20180502_D_1
Generator EPA ID:	CAL000397452
Shipment Date:	2018-05-02
Manifest Number:	001844757PSC
Line Number:	3
Method Code:	H141
Quantity Tons:	0.05350
Quantity Waste:	107.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	NULL
Quantity Type:	NULL
Federal Code:	D006
Year:	2018
EM Manifest ID:	001844757PSC20180502_D_1
Generator EPA ID:	CAL000397452
Shipment Date:	2018-05-02
Manifest Number:	001844757PSC
Line Number:	3
Method Code:	H141
Quantity Tons:	0.05350
Quantity Waste:	107.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	NULL
Quantity Type:	NULL
Federal Code:	D008
Year:	2018
EM Manifest ID:	001844757PSC20180502_D_1
Generator EPA ID:	CAL000397452
Shipment Date:	2018-05-02
Manifest Number:	001844757PSC
Line Number:	3
Method Code:	H141
Quantity Tons:	0.05350
Quantity Waste:	107.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	NULL
Quantity Type:	NULL

ROSS DRESS FOR LESS #0365 (Continued) **S118937706**

Federal Code: D011

Year: 2018
EM Manifest ID: 001844757PSC20180502_D_1
Generator EPA ID: CAL000397452
Shipment Date: 2018-05-02
Manifest Number: 001844757PSC
Line Number: 3
Method Code: H141
Quantity Tons: 0.05350
Quantity Waste: 107.000000
Quantity Unit: P
Number of Containers: 1
Type of Container: NULL
Quantity Type: NULL
Federal Code: D016

State:
Year: 2018
EM Manifest ID: 001844757PSC20180502_D_1
Generator EPA ID: CAL000397452
Shipment Date: 2018-05-02
Manifest Number: 001844757PSC
Line Number: 1
Method Code: H141
Quantity Tons: 0.00450
Quantity Waste: 9.000000
Quantity Unit: P
Number of Containers: 1
Type of Container: NULL
Quantity Type: NULL
State Code: 331

Year: 2018
EM Manifest ID: 001844757PSC20180502_D_1
Generator EPA ID: CAL000397452
Shipment Date: 2018-05-02
Manifest Number: 001844757PSC
Line Number: 2
Method Code: H141
Quantity Tons: 0.00400
Quantity Waste: 8.000000
Quantity Unit: P
Number of Containers: 1
Type of Container: NULL
Quantity Type: NULL
State Code: 331

Year: 2018
EM Manifest ID: 001844757PSC20180502_D_1
Generator EPA ID: CAL000397452
Shipment Date: 2018-05-02
Manifest Number: 001844757PSC
Line Number: 3
Method Code: H141
Quantity Tons: 0.05350
Quantity Waste: 107.000000

ROSS DRESS FOR LESS #0365 (Continued) **S118937706**

Quantity Unit:	P
Number of Containers:	1
Type of Container:	NULL
Quantity Type:	NULL
State Code:	331

Year:	2018
EM Manifest ID:	001705589PSC20171115_D_1
Shipment Date:	11/15/2017
Receipt Date:	12/19/2017
Manifest Number:	001705589PSC
Generator EPA ID:	CAL000397452
Name:	ROSS STORE #0365
Address:	Not reported
Address 2:	Not reported
City:	Not reported
Zip:	Not reported
Telephone:	Not reported
Contact:	Not reported
Contact Telephone:	Not reported
Transporter 1 EPA ID:	MNS000110924
Transporter 1 Emergency Number:	Not reported
Transporter 2 EPA ID:	NED986382133
Transporter 2 Emergency Number:	Not reported
TSDF EPA ID:	CAD008364432
TSDF Name:	RHO CHEM LLC
TSDF Address 1:	Not reported
TSDF Address 2:	Not reported
TSDF City:	Not reported
TSDF Zip:	Not reported
TSDF Telephone:	Not reported

Federal:

Year:	2018
EM Manifest ID:	001705589PSC20171115_D_1
Generator EPA ID:	CAL000397452
Shipment Date:	2017-11-15
Manifest Number:	001705589PSC
Line Number:	1
Method Code:	H141
Quantity Tons:	0.00300
Quantity Waste:	6.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	NULL
Quantity Type:	NULL
Federal Code:	D001

Year:	2018
EM Manifest ID:	001705589PSC20171115_D_1
Generator EPA ID:	CAL000397452
Shipment Date:	2017-11-15
Manifest Number:	001705589PSC
Line Number:	2
Method Code:	H141
Quantity Tons:	0.05750
Quantity Waste:	115.000000

ROSS DRESS FOR LESS #0365 (Continued) **S118937706**

Quantity Unit:	P
Number of Containers:	1
Type of Container:	NULL
Quantity Type:	NULL
Federal Code:	D006
Year:	2018
EM Manifest ID:	001705589PSC20171115_D_1
Generator EPA ID:	CAL000397452
Shipment Date:	2017-11-15
Manifest Number:	001705589PSC
Line Number:	2
Method Code:	H141
Quantity Tons:	0.05750
Quantity Waste:	115.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	NULL
Quantity Type:	NULL
Federal Code:	D008
Year:	2018
EM Manifest ID:	001705589PSC20171115_D_1
Generator EPA ID:	CAL000397452
Shipment Date:	2017-11-15
Manifest Number:	001705589PSC
Line Number:	2
Method Code:	H141
Quantity Tons:	0.05750
Quantity Waste:	115.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	NULL
Quantity Type:	NULL
Federal Code:	D011
Year:	2018
EM Manifest ID:	001705589PSC20171115_D_1
Generator EPA ID:	CAL000397452
Shipment Date:	2017-11-15
Manifest Number:	001705589PSC
Line Number:	2
Method Code:	H141
Quantity Tons:	0.05750
Quantity Waste:	115.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	NULL
Quantity Type:	NULL
Federal Code:	D016

State:

Year:	2018
EM Manifest ID:	001705589PSC20171115_D_1
Generator EPA ID:	CAL000397452
Shipment Date:	2017-11-15
Manifest Number:	001705589PSC

ROSS DRESS FOR LESS #0365 (Continued) **S118937706**

Line Number:	1
Method Code:	H141
Quantity Tons:	0.00300
Quantity Waste:	6.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	NULL
Quantity Type:	NULL
State Code:	331

Year:	2018
EM Manifest ID:	001705589PSC20171115_D_1
Generator EPA ID:	CAL000397452
Shipment Date:	2017-11-15
Manifest Number:	001705589PSC
Line Number:	2
Method Code:	H141
Quantity Tons:	0.05750
Quantity Waste:	115.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	NULL
Quantity Type:	NULL
State Code:	331

Year:	2018
EM Manifest ID:	176373
Shipment Date:	11/14/2018
Receipt Date:	12/4/2018
Manifest Number:	002031810PSC
Generator EPA ID:	CAL000397452
Name:	ROSS STORE #0365
Address:	194 DONAHUE ST
Address 2:	Not reported
City:	SAUSALITO
Zip:	94965
Telephone:	877-577-2669
Contact:	Not reported
Contact Telephone:	323-776-6233
Transporter 1 EPA ID:	MNS000110924
Transporter 1 Emergency Number:	Not reported
Transporter 2 EPA ID:	MOD095038998
Transporter 2 Emergency Number:	Not reported
TSDF EPA ID:	CAD008364432
TSDF Name:	Rho Chem LLC
TSDF Address 1:	425 Isis Ave.
TSDF Address 2:	Not reported
TSDF City:	Inglewood
TSDF Zip:	90301
TSDF Telephone:	Not reported

Federal:

Year:	2018
EM Manifest ID:	176373
Generator EPA ID:	CAL000397452
Shipment Date:	2018-11-14
Manifest Number:	002031810PSC

ROSS DRESS FOR LESS #0365 (Continued) **S118937706**

Line Number: 1
Method Code: H141
Quantity Tons: 0.06050
Quantity Waste: 121.000000
Quantity Unit: P
Number of Containers: 1
Type of Container: Fiberboard or plastic drums, barrels, kegs
Quantity Type: Pounds
Federal Code: D006

Year: 2018
EM Manifest ID: 176373
Generator EPA ID: CAL000397452
Shipment Date: 2018-11-14
Manifest Number: 002031810PSC
Line Number: 1
Method Code: H141
Quantity Tons: 0.06050
Quantity Waste: 121.000000
Quantity Unit: P
Number of Containers: 1
Type of Container: Fiberboard or plastic drums, barrels, kegs
Quantity Type: Pounds
Federal Code: D008

Year: 2018
EM Manifest ID: 176373
Generator EPA ID: CAL000397452
Shipment Date: 2018-11-14
Manifest Number: 002031810PSC
Line Number: 1
Method Code: H141
Quantity Tons: 0.06050
Quantity Waste: 121.000000
Quantity Unit: P
Number of Containers: 1
Type of Container: Fiberboard or plastic drums, barrels, kegs
Quantity Type: Pounds
Federal Code: D011

Year: 2018
EM Manifest ID: 176373
Generator EPA ID: CAL000397452
Shipment Date: 2018-11-14
Manifest Number: 002031810PSC
Line Number: 1
Method Code: H141
Quantity Tons: 0.06050
Quantity Waste: 121.000000
Quantity Unit: P
Number of Containers: 1
Type of Container: Fiberboard or plastic drums, barrels, kegs
Quantity Type: Pounds
Federal Code: D016

State:
Year: 2018

ROSS DRESS FOR LESS #0365 (Continued) **S118937706**

EM Manifest ID:	176373
Generator EPA ID:	CAL000397452
Shipment Date:	2018-11-14
Manifest Number:	002031810PSC
Line Number:	1
Method Code:	H141
Quantity Tons:	0.06050
Quantity Waste:	121.000000
Quantity Unit:	P
Number of Containers:	1
Type of Container:	Fiberboard or plastic drums, barrels, kegs
Quantity Type:	Pounds
State Code:	331

Additional Info:

Year:	2017
Gen EPA ID:	CAL000397452
Shipment Date:	20171115
Creation Date:	7/5/2018 18:31:14
Receipt Date:	20171219
Manifest ID:	001705589PSC
Trans EPA ID:	MNS000110924
Trans Name:	STERICYCLE SPECIALTY WASTE SOLUTIONS INC
Trans 2 EPA ID:	NED986382133
Trans 2 Name:	SMITH SYSTEMS TRANSPORTATION INC
TSDF EPA ID:	CAD008364432
Trans Name:	RHO CHEM LLC
TSDF Alt EPA ID:	Not reported
TSDF Alt Name:	Not reported
Waste Code Description:	331 - Off-specification, aged, or surplus organics
RCRA Code:	D001
Meth Code:	H141 - Storage, Bulking, And/Or Transfer Off Site--No Treatment/Reovery (H010-H129) Or (H131-H135)
Quantity Tons:	0.003
Waste Quantity:	6
Quantity Unit:	P
Additional Code 1:	Not reported
Additional Code 2:	Not reported
Additional Code 3:	Not reported
Additional Code 4:	Not reported
Additional Code 5:	Not reported
Shipment Date:	20171115
Creation Date:	7/5/2018 18:31:14
Receipt Date:	20171219
Manifest ID:	001705589PSC
Trans EPA ID:	MNS000110924
Trans Name:	STERICYCLE SPECIALTY WASTE SOLUTIONS INC
Trans 2 EPA ID:	NED986382133
Trans 2 Name:	SMITH SYSTEMS TRANSPORTATION INC
TSDF EPA ID:	CAD008364432
Trans Name:	RHO CHEM LLC
TSDF Alt EPA ID:	Not reported
TSDF Alt Name:	Not reported
Waste Code Description:	331 - Off-specification, aged, or surplus organics

ROSS DRESS FOR LESS #0365 (Continued) **S118937706**

RCRA Code:	D016
Meth Code:	H141 - Storage, Bulking, And/Or Transfer Off Site--No Treatment/Reovery (H010-H129) Or (H131-H135)
Quantity Tons:	0.0575
Waste Quantity:	115
Quantity Unit:	P
Additional Code 1:	D011
Additional Code 2:	D008
Additional Code 3:	D006
Additional Code 4:	Not reported
Additional Code 5:	Not reported
Shipment Date:	20170503
Creation Date:	5/12/2018 18:32:44
Receipt Date:	Not reported
Manifest ID:	001541760PSC
Trans EPA ID:	MNS000110924
Trans Name:	STERICYCLE SPECIALTY WASTE SOLUTIONS INC
Trans 2 EPA ID:	NED986382133
Trans 2 Name:	SMITH SYSTEMS TRANSP
TSDF EPA ID:	NVD980895338
Trans Name:	21ST CENTURY ENVIRONMENTAL MANAGEMENT OF NEVADA LLC
TSDF Alt EPA ID:	Not reported
TSDF Alt Name:	Not reported
Waste Code Description:	331 - Off-specification, aged, or surplus organics
RCRA Code:	D001
Meth Code:	H141 - Storage, Bulking, And/Or Transfer Off Site--No Treatment/Reovery (H010-H129) Or (H131-H135)
Quantity Tons:	0.0045
Waste Quantity:	9
Quantity Unit:	P
Additional Code 1:	Not reported
Additional Code 2:	Not reported
Additional Code 3:	Not reported
Additional Code 4:	Not reported
Additional Code 5:	Not reported
Shipment Date:	20170503
Creation Date:	5/12/2018 18:32:44
Receipt Date:	Not reported
Manifest ID:	001541760PSC
Trans EPA ID:	MNS000110924
Trans Name:	STERICYCLE SPECIALTY WASTE SOLUTIONS INC
Trans 2 EPA ID:	NED986382133
Trans 2 Name:	SMITH SYSTEMS TRANSP
TSDF EPA ID:	NVD980895338
Trans Name:	21ST CENTURY ENVIRONMENTAL MANAGEMENT OF NEVADA LLC
TSDF Alt EPA ID:	Not reported
TSDF Alt Name:	Not reported
Waste Code Description:	331 - Off-specification, aged, or surplus organics
RCRA Code:	D001
Meth Code:	H141 - Storage, Bulking, And/Or Transfer Off Site--No Treatment/Reovery (H010-H129) Or (H131-H135)
Quantity Tons:	0.0025
Waste Quantity:	5
Quantity Unit:	P
Additional Code 1:	Not reported

ROSS DRESS FOR LESS #0365 (Continued) **S118937706**

Additional Code 2:	Not reported
Additional Code 3:	Not reported
Additional Code 4:	Not reported
Additional Code 5:	Not reported
Shipment Date:	20170503
Creation Date:	5/12/2018 18:32:44
Receipt Date:	Not reported
Manifest ID:	001541760PSC
Trans EPA ID:	MNS000110924
Trans Name:	STERICYCLE SPECIALTY WASTE SOLUTIONS INC
Trans 2 EPA ID:	NED986382133
Trans 2 Name:	SMITH SYSTEMS TRANSP
TSDF EPA ID:	NVD980895338
Trans Name:	21ST CENTURY ENVIRONMENTAL MANAGEMENT OF NEVADA LLC
TSDF Alt EPA ID:	Not reported
TSDF Alt Name:	Not reported
Waste Code Description:	331 - Off-specification, aged, or surplus organics
RCRA Code:	Not reported
Meth Code:	H141 - Storage, Bulking, And/Or Transfer Off Site--No Treatment/Reovery (H010-H129) Or (H131-H135)
Quantity Tons:	0.0465
Waste Quantity:	93
Quantity Unit:	P
Additional Code 1:	Not reported
Additional Code 2:	Not reported
Additional Code 3:	Not reported
Additional Code 4:	Not reported
Additional Code 5:	Not reported

Additional Info:

Year:	2016
Gen EPA ID:	CAL000397452
Shipment Date:	20151230
Creation Date:	10/10/2016 18:30:40
Receipt Date:	20160105
Manifest ID:	001186182PSC
Trans EPA ID:	MNS000110924
Trans Name:	STERICYCLE SPECIALTY WASTE SOLUTIONS
Trans 2 EPA ID:	Not reported
Trans 2 Name:	Not reported
TSDF EPA ID:	NVD980895338
Trans Name:	21ST CENTURY ENVIRONMENTAL MANAGEMENT OF NEVADA LLC
TSDF Alt EPA ID:	Not reported
TSDF Alt Name:	Not reported
Waste Code Description:	331 - Off-specification, aged, or surplus organics
RCRA Code:	D001
Meth Code:	H141 - Storage, Bulking, And/Or Transfer Off Site--No Treatment/Reovery (H010-H129) Or (H131-H135)
Quantity Tons:	0.0015
Waste Quantity:	3
Quantity Unit:	P
Additional Code 1:	Not reported
Additional Code 2:	Not reported
Additional Code 3:	Not reported
Additional Code 4:	Not reported

ROSS DRESS FOR LESS #0365 (Continued) **S118937706**

Additional Code 5:	Not reported
Shipment Date:	20151230
Creation Date:	10/10/2016 18:30:40
Receipt Date:	20160105
Manifest ID:	001186182PSC
Trans EPA ID:	MNS000110924
Trans Name:	STERICYCLE SPECIALTY WASTE SOLUTIONS
Trans 2 EPA ID:	Not reported
Trans 2 Name:	Not reported
TSDF EPA ID:	NVD980895338
Trans Name:	21ST CENTURY ENVIRONMENTAL MANAGEMENT OF NEVADA LLC
TSDF Alt EPA ID:	Not reported
TSDF Alt Name:	Not reported
Waste Code Description:	331 - Off-specification, aged, or surplus organics
RCRA Code:	D001
Meth Code:	H141 - Storage, Bulking, And/Or Transfer Off Site--No Treatment/Reovery (H010-H129) Or (H131-H135)
Quantity Tons:	0.0025
Waste Quantity:	5
Quantity Unit:	P
Additional Code 1:	Not reported
Additional Code 2:	Not reported
Additional Code 3:	Not reported
Additional Code 4:	Not reported
Additional Code 5:	Not reported
Shipment Date:	20151230
Creation Date:	10/10/2016 18:30:40
Receipt Date:	20160105
Manifest ID:	001186182PSC
Trans EPA ID:	MNS000110924
Trans Name:	STERICYCLE SPECIALTY WASTE SOLUTIONS
Trans 2 EPA ID:	Not reported
Trans 2 Name:	Not reported
TSDF EPA ID:	NVD980895338
Trans Name:	21ST CENTURY ENVIRONMENTAL MANAGEMENT OF NEVADA LLC
TSDF Alt EPA ID:	Not reported
TSDF Alt Name:	Not reported
Waste Code Description:	791 - Liquids with pH < 2 792 Liquids with pH < 2 with metals
RCRA Code:	D002
Meth Code:	H141 - Storage, Bulking, And/Or Transfer Off Site--No Treatment/Reovery (H010-H129) Or (H131-H135)
Quantity Tons:	0.005
Waste Quantity:	10
Quantity Unit:	P
Additional Code 1:	Not reported
Additional Code 2:	Not reported
Additional Code 3:	Not reported
Additional Code 4:	Not reported
Additional Code 5:	Not reported
Shipment Date:	20151230
Creation Date:	10/10/2016 18:30:40
Receipt Date:	20160105
Manifest ID:	001186182PSC
Trans EPA ID:	MNS000110924

ROSS DRESS FOR LESS #0365 (Continued) **S118937706**

Trans Name:	STERICYCLE SPECIALTY WASTE SOLUTIONS
Trans 2 EPA ID:	Not reported
Trans 2 Name:	Not reported
TSDF EPA ID:	NVD980895338
Trans Name:	21ST CENTURY ENVIRONMENTAL MANAGEMENT OF NEVADA LLC
TSDF Alt EPA ID:	Not reported
TSDF Alt Name:	Not reported
Waste Code Description:	331 - Off-specification, aged, or surplus organics
RCRA Code:	Not reported
Meth Code:	H141 - Storage, Bulking, And/Or Transfer Off Site--No Treatment/Reovery (H010-H129) Or (H131-H135)
Quantity Tons:	0.025
Waste Quantity:	50
Quantity Unit:	P
Additional Code 1:	Not reported
Additional Code 2:	Not reported
Additional Code 3:	Not reported
Additional Code 4:	Not reported
Additional Code 5:	Not reported
Shipment Date:	20150716
Creation Date:	2/9/2016 22:15:11
Receipt Date:	20150722
Manifest ID:	001065519PSC
Trans EPA ID:	MNS000110924
Trans Name:	STERICYCLE SPECIALTY WASTE SOLUTIONS
Trans 2 EPA ID:	Not reported
Trans 2 Name:	Not reported
TSDF EPA ID:	NVD980895338
Trans Name:	21ST CENTURY ENVIRONMENTAL MANAGEMENT OF NEVADA LLC
TSDF Alt EPA ID:	Not reported
TSDF Alt Name:	Not reported
Waste Code Description:	331 - Off-specification, aged, or surplus organics
RCRA Code:	D001
Meth Code:	H141 - Storage, Bulking, And/Or Transfer Off Site--No Treatment/Reovery (H010-H129) Or (H131-H135)
Quantity Tons:	0.002
Waste Quantity:	4
Quantity Unit:	P
Additional Code 1:	Not reported
Additional Code 2:	Not reported
Additional Code 3:	Not reported
Additional Code 4:	Not reported
Additional Code 5:	Not reported
Shipment Date:	20150716
Creation Date:	2/9/2016 22:15:11
Receipt Date:	20150722
Manifest ID:	001065519PSC
Trans EPA ID:	MNS000110924
Trans Name:	STERICYCLE SPECIALTY WASTE SOLUTIONS
Trans 2 EPA ID:	Not reported
Trans 2 Name:	Not reported
TSDF EPA ID:	NVD980895338
Trans Name:	21ST CENTURY ENVIRONMENTAL MANAGEMENT OF NEVADA LLC
TSDF Alt EPA ID:	Not reported
TSDF Alt Name:	Not reported

ROSS DRESS FOR LESS #0365 (Continued) **S118937706**

Waste Code Description:	331 - Off-specification, aged, or surplus organics
RCRA Code:	Not reported
Meth Code:	H141 - Storage, Bulking, And/Or Transfer Off Site--No Treatment/Reovery (H010-H129) Or (H131-H135)
Quantity Tons:	0.023
Waste Quantity:	46
Quantity Unit:	P
Additional Code 1:	Not reported
Additional Code 2:	Not reported
Additional Code 3:	Not reported
Additional Code 4:	Not reported
Additional Code 5:	Not reported
Shipment Date:	20150128
Creation Date:	8/20/2015 22:15:27
Receipt Date:	20150204
Manifest ID:	000938817PSC
Trans EPA ID:	MNS000110924
Trans Name:	STERICYCLE SPECIALTY WASTE SOLUTIONS
Trans 2 EPA ID:	Not reported
Trans 2 Name:	Not reported
TSDF EPA ID:	NVD980895338
Trans Name:	21ST CENTURY ENVIRONMENTAL MANAGEMENT OF NEVADA LLC
TSDF Alt EPA ID:	Not reported
TSDF Alt Name:	Not reported
Waste Code Description:	331 - Off-specification, aged, or surplus organics
RCRA Code:	D001
Meth Code:	H141 - Storage, Bulking, And/Or Transfer Off Site--No Treatment/Reovery (H010-H129) Or (H131-H135)
Quantity Tons:	0.01
Waste Quantity:	20
Quantity Unit:	P
Additional Code 1:	Not reported
Additional Code 2:	Not reported
Additional Code 3:	Not reported
Additional Code 4:	Not reported
Additional Code 5:	Not reported
Shipment Date:	20150128
Creation Date:	8/20/2015 22:15:27
Receipt Date:	20150204
Manifest ID:	000938817PSC
Trans EPA ID:	MNS000110924
Trans Name:	STERICYCLE SPECIALTY WASTE SOLUTIONS
Trans 2 EPA ID:	Not reported
Trans 2 Name:	Not reported
TSDF EPA ID:	NVD980895338
Trans Name:	21ST CENTURY ENVIRONMENTAL MANAGEMENT OF NEVADA LLC
TSDF Alt EPA ID:	Not reported
TSDF Alt Name:	Not reported
Waste Code Description:	122 - Alkaline solution without metals (pH > 12.5
RCRA Code:	D002
Meth Code:	H121 - Neutralization Only
Quantity Tons:	0.011
Waste Quantity:	22
Quantity Unit:	P
Additional Code 1:	Not reported

ROSS DRESS FOR LESS #0365 (Continued) **S118937706**

Additional Code 2:	Not reported
Additional Code 3:	Not reported
Additional Code 4:	Not reported
Additional Code 5:	Not reported
Shipment Date:	20150128
Creation Date:	8/20/2015 22:15:27
Receipt Date:	20150204
Manifest ID:	000938817PSC
Trans EPA ID:	MNS000110924
Trans Name:	STERICYCLE SPECIALTY WASTE SOLUTIONS
Trans 2 EPA ID:	Not reported
Trans 2 Name:	Not reported
TSDF EPA ID:	NVD980895338
Trans Name:	21ST CENTURY ENVIRONMENTAL MANAGEMENT OF NEVADA LLC
TSDF Alt EPA ID:	Not reported
TSDF Alt Name:	Not reported
Waste Code Description:	331 - Off-specification, aged, or surplus organics
RCRA Code:	D016
Meth Code:	H141 - Storage, Bulking, And/Or Transfer Off Site--No Treatment/Reovery (H010-H129) Or (H131-H135)
Quantity Tons:	0.014
Waste Quantity:	28
Quantity Unit:	P
Additional Code 1:	D011
Additional Code 2:	D008
Additional Code 3:	D006
Additional Code 4:	Not reported
Additional Code 5:	Not reported
Shipment Date:	20150128
Creation Date:	8/20/2015 22:15:27
Receipt Date:	20150204
Manifest ID:	000938817PSC
Trans EPA ID:	MNS000110924
Trans Name:	STERICYCLE SPECIALTY WASTE SOLUTIONS
Trans 2 EPA ID:	Not reported
Trans 2 Name:	Not reported
TSDF EPA ID:	NVD980895338
Trans Name:	21ST CENTURY ENVIRONMENTAL MANAGEMENT OF NEVADA LLC
TSDF Alt EPA ID:	Not reported
TSDF Alt Name:	Not reported
Waste Code Description:	331 - Off-specification, aged, or surplus organics
RCRA Code:	Not reported
Meth Code:	H141 - Storage, Bulking, And/Or Transfer Off Site--No Treatment/Reovery (H010-H129) Or (H131-H135)
Quantity Tons:	0.043
Waste Quantity:	86
Quantity Unit:	P
Additional Code 1:	Not reported
Additional Code 2:	Not reported
Additional Code 3:	Not reported
Additional Code 4:	Not reported
Additional Code 5:	Not reported

Additional Info:

Year:	2015

ROSS DRESS FOR LESS #0365 (Continued) **S118937706**

Gen EPA ID:	CAL000397452
Shipment Date:	20151230
Creation Date:	10/10/2016 18:30:40
Receipt Date:	20160105
Manifest ID:	001186182PSC
Trans EPA ID:	MNS000110924
Trans Name:	STERICYCLE SPECIALTY WASTE SOLUTIONS
Trans 2 EPA ID:	Not reported
Trans 2 Name:	Not reported
TSDF EPA ID:	NVD980895338
Trans Name:	21ST CENTURY ENVIRONMENTAL MANAGEMENT OF NEVADA LLC
TSDF Alt EPA ID:	Not reported
TSDF Alt Name:	Not reported
Waste Code Description:	331 - Off-specification, aged, or surplus organics
RCRA Code:	D001
Meth Code:	H141 - Storage, Bulking, And/Or Transfer Off Site--No Treatment/Reovery (H010-H129) Or (H131-H135)
Quantity Tons:	0.0015
Waste Quantity:	3
Quantity Unit:	P
Additional Code 1:	Not reported
Additional Code 2:	Not reported
Additional Code 3:	Not reported
Additional Code 4:	Not reported
Additional Code 5:	Not reported
Shipment Date:	20151230
Creation Date:	10/10/2016 18:30:40
Receipt Date:	20160105
Manifest ID:	001186182PSC
Trans EPA ID:	MNS000110924
Trans Name:	STERICYCLE SPECIALTY WASTE SOLUTIONS
Trans 2 EPA ID:	Not reported
Trans 2 Name:	Not reported
TSDF EPA ID:	NVD980895338
Trans Name:	21ST CENTURY ENVIRONMENTAL MANAGEMENT OF NEVADA LLC
TSDF Alt EPA ID:	Not reported
TSDF Alt Name:	Not reported
Waste Code Description:	331 - Off-specification, aged, or surplus organics
RCRA Code:	Not reported
Meth Code:	H141 - Storage, Bulking, And/Or Transfer Off Site--No Treatment/Reovery (H010-H129) Or (H131-H135)
Quantity Tons:	0.025
Waste Quantity:	50
Quantity Unit:	P
Additional Code 1:	Not reported
Additional Code 2:	Not reported
Additional Code 3:	Not reported
Additional Code 4:	Not reported
Additional Code 5:	Not reported
Shipment Date:	20151230
Creation Date:	10/10/2016 18:30:40
Receipt Date:	20160105
Manifest ID:	001186182PSC
Trans EPA ID:	MNS000110924

ROSS DRESS FOR LESS #0365 (Continued) **S118937706**

Trans Name:	STERICYCLE SPECIALTY WASTE SOLUTIONS
Trans 2 EPA ID:	Not reported
Trans 2 Name:	Not reported
TSDF EPA ID:	NVD980895338
Trans Name:	21ST CENTURY ENVIRONMENTAL MANAGEMENT OF NEVADA LLC
TSDF Alt EPA ID:	Not reported
TSDF Alt Name:	Not reported
Waste Code Description:	331 - Off-specification, aged, or surplus organics
RCRA Code:	D001
Meth Code:	H141 - Storage, Bulking, And/Or Transfer Off Site--No Treatment/Reovery (H010-H129) Or (H131-H135)
Quantity Tons:	0.0025
Waste Quantity:	5
Quantity Unit:	P
Additional Code 1:	Not reported
Additional Code 2:	Not reported
Additional Code 3:	Not reported
Additional Code 4:	Not reported
Additional Code 5:	Not reported
Shipment Date:	20151230
Creation Date:	10/10/2016 18:30:40
Receipt Date:	20160105
Manifest ID:	001186182PSC
Trans EPA ID:	MNS000110924
Trans Name:	STERICYCLE SPECIALTY WASTE SOLUTIONS
Trans 2 EPA ID:	Not reported
Trans 2 Name:	Not reported
TSDF EPA ID:	NVD980895338
Trans Name:	21ST CENTURY ENVIRONMENTAL MANAGEMENT OF NEVADA LLC
TSDF Alt EPA ID:	Not reported
TSDF Alt Name:	Not reported
Waste Code Description:	791 - Liquids with pH < 2 792 Liquids with pH < 2 with metals
RCRA Code:	D002
Meth Code:	H141 - Storage, Bulking, And/Or Transfer Off Site--No Treatment/Reovery (H010-H129) Or (H131-H135)
Quantity Tons:	0.005
Waste Quantity:	10
Quantity Unit:	P
Additional Code 1:	Not reported
Additional Code 2:	Not reported
Additional Code 3:	Not reported
Additional Code 4:	Not reported
Additional Code 5:	Not reported
Shipment Date:	20150716
Creation Date:	2/9/2016 22:15:11
Receipt Date:	20150722
Manifest ID:	001065519PSC
Trans EPA ID:	MNS000110924
Trans Name:	STERICYCLE SPECIALTY WASTE SOLUTIONS
Trans 2 EPA ID:	Not reported
Trans 2 Name:	Not reported
TSDF EPA ID:	NVD980895338
Trans Name:	21ST CENTURY ENVIRONMENTAL MANAGEMENT OF NEVADA LLC
TSDF Alt EPA ID:	Not reported
TSDF Alt Name:	Not reported

ROSS DRESS FOR LESS #0365 (Continued) **S118937706**

Waste Code Description:	331 - Off-specification, aged, or surplus organics
RCRA Code:	Not reported
Meth Code:	H141 - Storage, Bulking, And/Or Transfer Off Site--No Treatment/Reovery (H010-H129) Or (H131-H135)
Quantity Tons:	0.023
Waste Quantity:	46
Quantity Unit:	P
Additional Code 1:	Not reported
Additional Code 2:	Not reported
Additional Code 3:	Not reported
Additional Code 4:	Not reported
Additional Code 5:	Not reported
Shipment Date:	20150716
Creation Date:	2/9/2016 22:15:11
Receipt Date:	20150722
Manifest ID:	001065519PSC
Trans EPA ID:	MNS000110924
Trans Name:	STERICYCLE SPECIALTY WASTE SOLUTIONS
Trans 2 EPA ID:	Not reported
Trans 2 Name:	Not reported
TSDF EPA ID:	NVD980895338
Trans Name:	21ST CENTURY ENVIRONMENTAL MANAGEMENT OF NEVADA LLC
TSDF Alt EPA ID:	Not reported
TSDF Alt Name:	Not reported
Waste Code Description:	331 - Off-specification, aged, or surplus organics
RCRA Code:	D001
Meth Code:	H141 - Storage, Bulking, And/Or Transfer Off Site--No Treatment/Reovery (H010-H129) Or (H131-H135)
Quantity Tons:	0.002
Waste Quantity:	4
Quantity Unit:	P
Additional Code 1:	Not reported
Additional Code 2:	Not reported
Additional Code 3:	Not reported
Additional Code 4:	Not reported
Additional Code 5:	Not reported
Shipment Date:	20150128
Creation Date:	8/20/2015 22:15:27
Receipt Date:	20150204
Manifest ID:	000938817PSC
Trans EPA ID:	MNS000110924
Trans Name:	STERICYCLE SPECIALTY WASTE SOLUTIONS
Trans 2 EPA ID:	Not reported
Trans 2 Name:	Not reported
TSDF EPA ID:	NVD980895338
Trans Name:	21ST CENTURY ENVIRONMENTAL MANAGEMENT OF NEVADA LLC
TSDF Alt EPA ID:	Not reported
TSDF Alt Name:	Not reported
Waste Code Description:	331 - Off-specification, aged, or surplus organics
RCRA Code:	Not reported
Meth Code:	H141 - Storage, Bulking, And/Or Transfer Off Site--No Treatment/Reovery (H010-H129) Or (H131-H135)
Quantity Tons:	0.043
Waste Quantity:	86
Quantity Unit:	P

ROSS DRESS FOR LESS #0365 (Continued) **S118937706**

Additional Code 1:	Not reported
Additional Code 2:	Not reported
Additional Code 3:	Not reported
Additional Code 4:	Not reported
Additional Code 5:	Not reported
Shipment Date:	20150128
Creation Date:	8/20/2015 22:15:27
Receipt Date:	20150204
Manifest ID:	000938817PSC
Trans EPA ID:	MNS000110924
Trans Name:	STERICYCLE SPECIALTY WASTE SOLUTIONS
Trans 2 EPA ID:	Not reported
Trans 2 Name:	Not reported
TSDF EPA ID:	NVD980895338
Trans Name:	21ST CENTURY ENVIRONMENTAL MANAGEMENT OF NEVADA LLC
TSDF Alt EPA ID:	Not reported
TSDF Alt Name:	Not reported
Waste Code Description:	331 - Off-specification, aged, or surplus organics
RCRA Code:	D001
Meth Code:	H141 - Storage, Bulking, And/Or Transfer Off Site--No Treatment/Reovery (H010-H129) Or (H131-H135)
Quantity Tons:	0.01
Waste Quantity:	20
Quantity Unit:	P
Additional Code 1:	Not reported
Additional Code 2:	Not reported
Additional Code 3:	Not reported
Additional Code 4:	Not reported
Additional Code 5:	Not reported
Shipment Date:	20150128
Creation Date:	8/20/2015 22:15:27
Receipt Date:	20150204
Manifest ID:	000938817PSC
Trans EPA ID:	MNS000110924
Trans Name:	STERICYCLE SPECIALTY WASTE SOLUTIONS
Trans 2 EPA ID:	Not reported
Trans 2 Name:	Not reported
TSDF EPA ID:	NVD980895338
Trans Name:	21ST CENTURY ENVIRONMENTAL MANAGEMENT OF NEVADA LLC
TSDF Alt EPA ID:	Not reported
TSDF Alt Name:	Not reported
Waste Code Description:	122 - Alkaline solution without metals (pH > 12.5
RCRA Code:	D002
Meth Code:	H121 - Neutralization Only
Quantity Tons:	0.011
Waste Quantity:	22
Quantity Unit:	P
Additional Code 1:	Not reported
Additional Code 2:	Not reported
Additional Code 3:	Not reported
Additional Code 4:	Not reported
Additional Code 5:	Not reported
Shipment Date:	20150128
Creation Date:	8/20/2015 22:15:27

ROSS DRESS FOR LESS #0365 (Continued) **S118937706**

Receipt Date:	20150204
Manifest ID:	000938817PSC
Trans EPA ID:	MNS000110924
Trans Name:	STERICYCLE SPECIALTY WASTE SOLUTIONS
Trans 2 EPA ID:	Not reported
Trans 2 Name:	Not reported
TSDF EPA ID:	NVD980895338
Trans Name:	21ST CENTURY ENVIRONMENTAL MANAGEMENT OF NEVADA LLC
TSDF Alt EPA ID:	Not reported
TSDF Alt Name:	Not reported
Waste Code Description:	331 - Off-specification, aged, or surplus organics
RCRA Code:	D016
Meth Code:	H141 - Storage, Bulking, And/Or Transfer Off Site--No Treatment/Reovery (H010-H129) Or (H131-H135)
Quantity Tons:	0.014
Waste Quantity:	28
Quantity Unit:	P
Additional Code 1:	D011
Additional Code 2:	D008
Additional Code 3:	D006
Additional Code 4:	Not reported
Additional Code 5:	Not reported

HWTS:

Name:	ROSS DRESS FOR LESS #0365
Address:	194 DONAHUE ST
Address 2:	Not reported
City,State,Zip:	SAUSALITO, CA 94965
EPA ID:	CAL000397452
Inactive Date:	Not reported
Create Date:	06/05/2014
Last Act Date:	Not reported
Mailing Name:	Not reported
Mailing Address:	5130 HACIENDA DR
Mailing Address 2:	Not reported
Mailing City,State,Zip:	DUBLIN, CA 945680000
Owner Name:	ROSS DRESS FOR LESS INC
Owner Address:	5130 HACIENDA DR
Owner Address 2:	Not reported
Owner City,State,Zip:	DUBLIN, CA 94568
Contact Name:	KATHY HATCH
Contact Address:	5130 HACIENDA DR
Contact Address 2:	Not reported
City,State,Zip:	DUBLIN, CA 94568
Facility Status:	Active
Facility Type:	PERMANENT
Category:	STATE
Latitude:	37.872855
Longitude:	-122.5090665

NAICS:

EPA ID:	CAL000397452
Create Date:	2014-06-05 14:08:03.563
NAICS Code:	44814
NAICS Description:	Family Clothing Stores
Issued EPA ID Date:	2014-06-05 14:08:03.56300
Inactive Date:	Not reported

ROSS DRESS FOR LESS #0365 (Continued) **S118937706**

Facility Name:	ROSS DRESS FOR LESS #0365
Facility Address:	194 DONAHUE ST
Facility Address 2:	Not reported
Facility City:	SAUSALITO
Facility County:	Not reported
Facility State:	CA
Facility Zip:	949651250

E22
East
< 1/8
0.111 mi.
586 ft.
Relative:
Lower
Actual:
37 ft.

ROSS DRESS FOR LESS #0365 **RCRA NonGen / NLR** **1024844787**
194 DONAHUE ST **CAL000397452**
SAUSALITO, CA 94965

Site 2 of 2 in cluster E

RCRA Listings:

Date Form Received by Agency:		20140605
Handler Name:	ROSS DRESS FOR LESS #0365	
Handler Address:		194 DONAHUE ST
Handler City,State,Zip:		SAUSALITO, CA 94965-1250
EPA ID:		CAL000397452
Contact Name:		KATHY HATCH
Contact Address:		5130 HACIENDA DR
Contact City,State,Zip:		DUBLIN, CA 94568
Contact Telephone:		925-965-4015
Contact Fax:		925-965-4183
Contact Email:		ERIC.GUARD@ROS.COM
Contact Title:		Not reported
EPA Region:		09
Land Type:		Not reported
Federal Waste Generator Description:		Not a generator, verified
Non-Notifier:		Not reported
Biennial Report Cycle:		Not reported
Accessibility:		Not reported
Active Site Indicator:		Handler Activities
State District Owner:		Not reported
State District:		Not reported
Mailing Address:		5151 SAN FELIPE ST STE 1000
Mailing City,State,Zip:		HOUSTON, TX 77056
Owner Name:	ROSS DRESS FOR LESS INC	
Owner Type:		Other
Operator Name:	KATHY HATCH	
Operator Type:		Other
Short-Term Generator Activity:		No
Importer Activity:		No
Mixed Waste Generator:		No
Transporter Activity:		No
Transfer Facility Activity:		No
Recycler Activity with Storage:		No
Small Quantity On-Site Burner Exemption:		No
Smelting Melting and Refining Furnace Exemption:		No
Underground Injection Control:		No
Off-Site Waste Receipt:		No
Universal Waste Indicator:		Yes
Universal Waste Destination Facility:		Yes
Federal Universal Waste:		No
Active Site Fed-Reg Treatment Storage and Disposal Facility:		Not reported
Active Site Converter Treatment storage and Disposal Facility:		Not reported

ROSS DRESS FOR LESS #0365 (Continued) **1024844787**

Active Site State-Reg Treatment Storage and Disposal Facility:	Not reported
Active Site State-Reg Handler:	---
Federal Facility Indicator:	Not reported
Hazardous Secondary Material Indicator:	N
Sub-Part K Indicator:	Not reported
Commercial TSD Indicator:	No
Treatment Storage and Disposal Type:	Not reported
2018 GPRA Permit Baseline:	Not on the Baseline
2018 GPRA Renewals Baseline:	Not on the Baseline
Permit Renewals Workload Universe:	Not reported
Permit Workload Universe:	Not reported
Permit Progress Universe:	Not reported
Post-Closure Workload Universe:	Not reported
Closure Workload Universe:	Not reported
202 GPRA Corrective Action Baseline:	No
Corrective Action Workload Universe:	No
Subject to Corrective Action Universe:	No
Non-TSDFs Where RCRA CA has Been Imposed Universe:	No
TSDFs Potentially Subject to CA Under 3004 (u)/(v) Universe:	No
TSDFs Only Subject to CA under Discretionary Auth Universe:	No
Corrective Action Priority Ranking:	No NCAPS ranking
Environmental Control Indicator:	No
Institutional Control Indicator:	No
Human Exposure Controls Indicator:	N/A
Groundwater Controls Indicator:	N/A
Operating TSDF Universe:	Not reported
Full Enforcement Universe:	Not reported
Significant Non-Complier Universe:	No
Unaddressed Significant Non-Complier Universe:	No
Addressed Significant Non-Complier Universe:	No
Significant Non-Complier With a Compliance Schedule Universe:	No
Financial Assurance Required: Not reported	
Handler Date of Last Change:	20180906
Recognized Trader-Importer:	No
Recognized Trader-Exporter:	No
Importer of Spent Lead Acid Batteries:	No
Exporter of Spent Lead Acid Batteries:	No
Recycler Activity Without Storage:	No
Manifest Broker:	No
Sub-Part P Indicator:	No

Handler - Owner Operator:

Owner/Operator Indicator:	Owner
Owner/Operator Name: ROSS DRESS FOR LESS INC	
Legal Status:	Other
Date Became Current:	Not reported
Date Ended Current:	Not reported
Owner/Operator Address:	5130 HACIENDA DR
Owner/Operator City,State,Zip:	DUBLIN, CA 94568
Owner/Operator Telephone:	925-965-4831
Owner/Operator Telephone Ext:	Not reported
Owner/Operator Fax:	Not reported
Owner/Operator Email:	Not reported
Owner/Operator Indicator:	Operator
Owner/Operator Name: KATHY HATCH	

ROSS DRESS FOR LESS #0365 (Continued) **1024844787**

Legal Status:	Other
Date Became Current:	Not reported
Date Ended Current:	Not reported
Owner/Operator Address:	5130 HACIENDA DR
Owner/Operator City,State,Zip:	DUBLIN, CA 94568
Owner/Operator Telephone:	925-965-4015
Owner/Operator Telephone Ext:	Not reported
Owner/Operator Fax:	Not reported
Owner/Operator Email:	Not reported

Historic Generators:

Receive Date:	20140605
Handler Name:	ROSS DRESS FOR LESS #0365
Federal Waste Generator Description:	Not a generator, verified
State District Owner:	Not reported
Large Quantity Handler of Universal Waste:	No
Recognized Trader Importer:	No
Recognized Trader Exporter:	No
Spent Lead Acid Battery Importer:	No
Spent Lead Acid Battery Exporter:	No
Current Record:	Yes
Non Storage Recycler Activity:	Not reported
Electronic Manifest Broker:	Not reported

List of NAICS Codes and Descriptions:

NAICS Code:	44814
NAICS Description:	FAMILY CLOTHING STORES

Facility Has Received Notices of Violations:

Violations:	No Violations Found

Evaluation Action Summary:

Evaluations:	No Evaluations Found

23
North
< 1/8
0.113 mi.
597 ft.

HEADLANDS ONE **RCRA NonGen / NLR** **1025839518**
269 DONAHUE ST **CAC003019118**
SAUSALITO, CA 94965

Relative: Higher

Actual: 162 ft.

RCRA Listings:

Date Form Received by Agency:		20190611
Handler Name:	HEADLANDS ONE	
Handler Address:		269 DONAHUE ST
Handler City,State,Zip:		SAUSALITO, CA 94965
EPA ID:		CAC003019118
Contact Name:		JAMES PIPER
Contact Address:		384 BEL MARIN KEYS BLVD SUITE 210
Contact City,State,Zip:		NOVATO, CA 94949
Contact Telephone:		415-532-5689
Contact Fax:		Not reported
Contact Email:		JIMMYPIPER1981@YAHOO.COM
Contact Title:		Not reported
EPA Region:		09
Land Type:		Not reported

HEADLANDS ONE (Continued) **1025839518**

Federal Waste Generator Description:		Not a generator, verified
Non-Notifier:		Not reported
Biennial Report Cycle:		Not reported
Accessibility:		Not reported
Active Site Indicator:		Handler Activities
State District Owner:		Not reported
State District:		Not reported
Mailing Address:		384 BEL MARIN KEYS BLVD SUITE 210
Mailing City,State,Zip:		NOVATO, CA 94949
Owner Name:	HEADLANDS 1	
Owner Type:		Other
Operator Name:	JAMES PIPER	
Operator Type:		Other
Short-Term Generator Activity:		No
Importer Activity:		No
Mixed Waste Generator:		No
Transporter Activity:		No
Transfer Facility Activity:		No
Recycler Activity with Storage:		No
Small Quantity On-Site Burner Exemption:		No
Smelting Melting and Refining Furnace Exemption:		No
Underground Injection Control:		No
Off-Site Waste Receipt:		No
Universal Waste Indicator:		Yes
Universal Waste Destination Facility:		Yes
Federal Universal Waste:		No
Active Site Fed-Reg Treatment Storage and Disposal Facility:		Not reported
Active Site Converter Treatment storage and Disposal Facility:		Not reported
Active Site State-Reg Treatment Storage and Disposal Facility:		Not reported
Active Site State-Reg Handler:		---
Federal Facility Indicator:		Not reported
Hazardous Secondary Material Indicator:		N
Sub-Part K Indicator:		Not reported
Commercial TSD Indicator:		No
Treatment Storage and Disposal Type:		Not reported
2018 GPRA Permit Baseline:		Not on the Baseline
2018 GPRA Renewals Baseline:		Not on the Baseline
Permit Renewals Workload Universe:		Not reported
Permit Workload Universe:		Not reported
Permit Progress Universe:		Not reported
Post-Closure Workload Universe:		Not reported
Closure Workload Universe:		Not reported
202 GPRA Corrective Action Baseline:		No
Corrective Action Workload Universe:		No
Subject to Corrective Action Universe:		No
Non-TSDFs Where RCRA CA has Been Imposed Universe:		No
TSDFs Potentially Subject to CA Under 3004 (u)/(v) Universe:		No
TSDFs Only Subject to CA under Discretionary Auth Universe:		No
Corrective Action Priority Ranking:		No NCAPS ranking
Environmental Control Indicator:		No
Institutional Control Indicator:		No
Human Exposure Controls Indicator:		N/A
Groundwater Controls Indicator:		N/A
Operating TSDF Universe:		Not reported
Full Enforcement Universe:		Not reported
Significant Non-Complier Universe:		No
Unaddressed Significant Non-Complier Universe:		No

HEADLANDS ONE (Continued) **1025839518**

Addressed Significant Non-Complier Universe:	No
Significant Non-Complier With a Compliance Schedule Universe:	No
Financial Assurance Required:	Not reported
Handler Date of Last Change:	20190627
Recognized Trader-Importer:	No
Recognized Trader-Exporter:	No
Importer of Spent Lead Acid Batteries:	No
Exporter of Spent Lead Acid Batteries:	No
Recycler Activity Without Storage:	No
Manifest Broker:	No
Sub-Part P Indicator:	No

Handler - Owner Operator:

Owner/Operator Indicator:	Owner
Owner/Operator Name: HEADLANDS 1	
Legal Status:	Other
Date Became Current:	Not reported
Date Ended Current:	Not reported
Owner/Operator Address:	269 DONAHUE ST
Owner/Operator City,State,Zip:	SAUSALITO, CA 94965
Owner/Operator Telephone:	415-532-5689
Owner/Operator Telephone Ext:	Not reported
Owner/Operator Fax:	Not reported
Owner/Operator Email:	Not reported

Owner/Operator Indicator:	Operator
Owner/Operator Name: JAMES PIPER	
Legal Status:	Other
Date Became Current:	Not reported
Date Ended Current:	Not reported
Owner/Operator Address:	384 BEL MARIN KEYS BLVD SUITE 210
Owner/Operator City,State,Zip:	NOVATO, CA 94949
Owner/Operator Telephone:	415-532-5689
Owner/Operator Telephone Ext:	Not reported
Owner/Operator Fax:	Not reported
Owner/Operator Email:	Not reported

Historic Generators:

Receive Date:	20190611
Handler Name: HEADLANDS ONE	
Federal Waste Generator Description:	Not a generator, verified
State District Owner:	Not reported
Large Quantity Handler of Universal Waste:	No
Recognized Trader Importer:	No
Recognized Trader Exporter:	No
Spent Lead Acid Battery Importer:	No
Spent Lead Acid Battery Exporter:	No
Current Record:	Yes
Non Storage Recycler Activity:	Not reported
Electronic Manifest Broker:	Not reported

List of NAICS Codes and Descriptions:

NAICS Code:	56299
NAICS Description:	ALL OTHER WASTE MANAGEMENT SERVICES

HEADLANDS ONE (Continued) **1025839518**

Facility Has Received Notices of Violations:
Violations: No Violations Found

Evaluation Action Summary:
Evaluations: No Evaluations Found

F24 **SUMMIT AT SAUSALITO** **RCRA NonGen / NLR** **1026056987**
NNW **401 SHERWOOD DR** **CAL000453180**
1/8-1/4 **SAUSALITO, CA 94965**
0.141 mi.
746 ft. **Site 1 of 2 in cluster F**

Relative: **Higher**
Actual: **187 ft.**

RCRA Listings:

Date Form Received by Agency:		20200303
Handler Name:	SUMMIT AT SAUSALITO	
Handler Address:		401 SHERWOOD DR
Handler City,State,Zip:		SAUSALITO, CA 94965
EPA ID:		CAL000453180
Contact Name:		LISETTE BANAJAS
Contact Address:		401 SHERWOOD DR
Contact City,State,Zip:		SAUSALITO, CA 94965
Contact Telephone:		415-332-5613
Contact Fax:		Not reported
Contact Email:		SUMMITATSAUSALITO@EQR.COM
Contact Title:		Not reported
EPA Region:		09
Land Type:		Not reported
Federal Waste Generator Description:		Not a generator, verified
Non-Notifier:		Not reported
Biennial Report Cycle:		Not reported
Accessibility:		Not reported
Active Site Indicator:		Not reported
State District Owner:		Not reported
State District:		Not reported
Mailing Address:		401 SHERWOOD DR
Mailing City,State,Zip:		SAUSALITO, CA 94965
Owner Name:	EQUITY RESIDENTIAL	
Owner Type:		Other
Operator Name:	LISETTE BANAJAS	
Operator Type:		Other
Short-Term Generator Activity:		No
Importer Activity:		No
Mixed Waste Generator:		No
Transporter Activity:		No
Transfer Facility Activity:		No
Recycler Activity with Storage:		No
Small Quantity On-Site Burner Exemption:		No
Smelting Melting and Refining Furnace Exemption:		No
Underground Injection Control:		No
Off-Site Waste Receipt:		No
Universal Waste Indicator:		No
Universal Waste Destination Facility:		No
Federal Universal Waste:		No
Active Site Fed-Reg Treatment Storage and Disposal Facility:		Not reported
Active Site Converter Treatment storage and Disposal Facility:		Not reported
Active Site State-Reg Treatment Storage and Disposal Facility:		Not reported

SUMMIT AT SAUSALITO (Continued) **1026056987**

Active Site State-Reg Handler:	---
Federal Facility Indicator:	Not reported
Hazardous Secondary Material Indicator:	N
Sub-Part K Indicator:	Not reported
Commercial TSD Indicator:	No
Treatment Storage and Disposal Type:	Not reported
2018 GPRA Permit Baseline:	Not on the Baseline
2018 GPRA Renewals Baseline:	Not on the Baseline
Permit Renewals Workload Universe:	Not reported
Permit Workload Universe:	Not reported
Permit Progress Universe:	Not reported
Post-Closure Workload Universe:	Not reported
Closure Workload Universe:	Not reported
202 GPRA Corrective Action Baseline:	No
Corrective Action Workload Universe:	No
Subject to Corrective Action Universe:	No
Non-TSDFs Where RCRA CA has Been Imposed Universe:	No
TSDFs Potentially Subject to CA Under 3004 (u)/(v) Universe:	No
TSDFs Only Subject to CA under Discretionary Auth Universe:	No
Corrective Action Priority Ranking:	No NCAPS ranking
Environmental Control Indicator:	No
Institutional Control Indicator:	No
Human Exposure Controls Indicator:	N/A
Groundwater Controls Indicator:	N/A
Operating TSDF Universe:	Not reported
Full Enforcement Universe:	Not reported
Significant Non-Complier Universe:	No
Unaddressed Significant Non-Complier Universe:	No
Addressed Significant Non-Complier Universe:	No
Significant Non-Complier With a Compliance Schedule Universe:	No
Financial Assurance Required: Not reported	
Handler Date of Last Change:	20200306
Recognized Trader-Importer:	No
Recognized Trader-Exporter:	No
Importer of Spent Lead Acid Batteries:	No
Exporter of Spent Lead Acid Batteries:	No
Recycler Activity Without Storage:	No
Manifest Broker:	No
Sub-Part P Indicator:	No

Handler - Owner Operator:

Owner/Operator Indicator:	Owner
Owner/Operator Name: EQUITY RESIDENTIAL	
Legal Status:	Other
Date Became Current:	Not reported
Date Ended Current:	Not reported
Owner/Operator Address:	333 THIRD AVE
Owner/Operator City,State,Zip:	SAN FRANCISCO, CA 94107
Owner/Operator Telephone:	415-767-7174
Owner/Operator Telephone Ext:	Not reported
Owner/Operator Fax:	Not reported
Owner/Operator Email:	Not reported
Owner/Operator Indicator:	Operator
Owner/Operator Name: LISETTE BANAJAS	
Legal Status:	Other

SUMMIT AT SAUSALITO (Continued) **1026056987**

Date Became Current:	Not reported
Date Ended Current:	Not reported
Owner/Operator Address:	401 SHERWOOD DR
Owner/Operator City,State,Zip:	SAUSALITO, CA 94965
Owner/Operator Telephone:	415-332-5613
Owner/Operator Telephone Ext:	Not reported
Owner/Operator Fax:	Not reported
Owner/Operator Email:	Not reported

Historic Generators:

Receive Date:	20200303
Handler Name: SUMMIT AT SAUSALITO	
Federal Waste Generator Description:	Not a generator, verified
State District Owner:	Not reported
Large Quantity Handler of Universal Waste:	No
Recognized Trader Importer:	No
Recognized Trader Exporter:	No
Spent Lead Acid Battery Importer:	No
Spent Lead Acid Battery Exporter:	No
Current Record:	Yes
Non Storage Recycler Activity:	Not reported
Electronic Manifest Broker:	Not reported

List of NAICS Codes and Descriptions:

NAICS Code:	56299
NAICS Description:	ALL OTHER WASTE MANAGEMENT SERVICES

Facility Has Received Notices of Violations:

Violations:	No Violations Found

Evaluation Action Summary:

Evaluations:	No Evaluations Found

F25 **ARCHSTONE SAUSALITO** **CERS HAZ WASTE** **S113790343**
NNW **401 SHERWOOD DR** **HAZNET** **N/A**
1/8-1/4 **SAUSALITO, CA 94965** **HWTS**
0.141 mi.
746 ft. **Site 2 of 2 in cluster F**

Relative: Higher

Actual: 187 ft.

CERS HAZ WASTE:

Name:	SUMMIT AT SAUSALITO
Address:	401 SHERWOOD DR
City,State,Zip:	SAUSALITO, CA 94965
Site ID:	563261
CERS ID:	10835035
CERS Description:	Hazardous Waste Generator

Affiliation:

Affiliation Type Desc:	CUPA District
Entity Name:	Marin County CUPA
Entity Title:	Not reported
Affiliation Address:	1600 Los GamosSuite 210
Affiliation City:	San Rafael
Affiliation State:	CA
Affiliation Country:	Not reported

ARCHSTONE SAUSALITO (Continued) **S113790343**

Affiliation Zip:	94903
Affiliation Phone:	(415) 473-6647,
Affiliation Type Desc:	Parent Corporation
Entity Name:	Summit at Sausalito
Entity Title:	Not reported
Affiliation Address:	Not reported
Affiliation City:	Not reported
Affiliation State:	Not reported
Affiliation Country:	Not reported
Affiliation Zip:	Not reported
Affiliation Phone:	,

HAZNET:

Name:	ARCHSTONE SAUSALITO
Address:	401 SHERWOOD DR
Address 2:	Not reported
City,State,Zip:	SAUSALITO, CA 94965
Contact:	BOBBY AQUILAR
Telephone:	5102099861
Mailing Name:	Not reported
Mailing Address:	333 3RD ST
Year:	2012
Gepaid:	CAC002708086
TSD EPA ID:	CAD028409019
CA Waste Code:	352 - Other organic solids
Disposal Method:	-
Tons:	0.3

Additional Info:

Year:	2012
Gen EPA ID:	CAC002708086
Shipment Date:	20121011
Creation Date:	12/24/2012 22:15:13
Receipt Date:	20121015
Manifest ID:	009811436JJK
Trans EPA ID:	CAR000030114
Trans Name:	NRC ENVIRONMENTAL SERVICES
Trans 2 EPA ID:	Not reported
Trans 2 Name:	Not reported
TSDF EPA ID:	CAD028409019
Trans Name:	CROSBY & OVERTON INC
TSDF Alt EPA ID:	Not reported
TSDF Alt Name:	Not reported
Waste Code Description:	352 - Other organic solids
RCRA Code:	Not reported
Meth Code:	- Not reported
Quantity Tons:	0.3
Waste Quantity:	600
Quantity Unit:	P
Additional Code 1:	Not reported
Additional Code 2:	Not reported

ARCHSTONE SAUSALITO (Continued) **S113790343**

Additional Code 3: Not reported
Additional Code 4: Not reported
Additional Code 5: Not reported

HWTS:
Name: SUMMIT AT SAUSALITO
Address: 401 SHERWOOD DR
Address 2: Not reported
City,State,Zip: SAUSALITO, CA 94965
EPA ID: CAL000453180
Inactive Date: 06/30/2020
Create Date: 03/03/2020
Last Act Date: Not reported
Mailing Name: Not reported
Mailing Address: 401 SHERWOOD DR
Mailing Address 2: Not reported
Mailing City,State,Zip: SAUSALITO, CA 94965
Owner Name: EQUITY RESIDENTIAL
Owner Address: 333 THIRD AVE
Owner Address 2: Not reported
Owner City,State,Zip: SAN FRANCISCO, CA 94107
Contact Name: LISETTE BANAJAS
Contact Address: 401 SHERWOOD DR
Contact Address 2: Not reported
City,State,Zip: SAUSALITO, CA 94965
Facility Status: Inactive
Facility Type: PERMANENT
Category: STATE
Latitude: 37.875915
Longitude: -122.515389

NAICS:
EPA ID: CAL000453180
Create Date: 2020-03-03 13:16:01.637
NAICS Code: 99999
NAICS Description: Not Otherwise Specified
Issued EPA ID Date: 2020-03-03 13:16:01.60700
Inactive Date: 2020-06-30 00:00:00
Facility Name: SUMMIT AT SAUSALITO
Facility Address: 401 SHERWOOD DR
Facility Address 2: Not reported
Facility City: SAUSALITO
Facility County: Not reported
Facility State: CA
Facility Zip: 94965

Name: ARCHSTONE SAUSALITO
Address: 401 SHERWOOD DR
Address 2: Not reported
City,State,Zip: SAUSALITO, CA 94965
EPA ID: CAC002708086
Inactive Date: 01/10/2013
Create Date: 10/11/2012
Last Act Date: Not reported
Mailing Name: Not reported
Mailing Address: 333 3RD ST

ARCHSTONE SAUSALITO (Continued) **S113790343**

Mailing Address 2:	Not reported
Mailing City,State,Zip:	SAN FRANCISCO, CA 941071240
Owner Name:	ARCHSTONE SAUSALITO
Owner Address:	333 3RD ST
Owner Address 2:	Not reported
Owner City,State,Zip:	SAN FRANCISCO, CA 941071240
Contact Name:	BOBBY AQUILAR
Contact Address:	333 3RD ST
Contact Address 2:	Not reported
City,State,Zip:	SAN FRANCISCO, CA 94107
Facility Status:	Inactive
Facility Type:	TEMPORARY
Category:	STATE
Latitude:	37.87591
Longitude:	-122.51538

NAICS:

EPA ID:	CAC002708086
Create Date:	2012-10-11 16:12:26.183
NAICS Code:	23521
NAICS Description:	Painting and Wall Covering Contractors
Issued EPA ID Date:	2012-10-11 16:12:26.15300
Inactive Date:	2013-01-10 16:12:26.13700
Facility Name:	ARCHSTONE SAUSALITO
Facility Address:	401 SHERWOOD DR
Facility Address 2:	Not reported
Facility City:	SAUSALITO
Facility County:	Not reported
Facility State:	CA
Facility Zip:	94965

G26 **MARIN CITY HEALTH AND WELLNESS CENTER** **RCRA NonGen / NLR** **1024871633**
South **630 DRAKE AVE** **CAL000440278**
1/8-1/4 **SAUSALITO, CA 94965**
0.149 mi.
789 ft. **Site 1 of 5 in cluster G**

Relative: **Lower**

Actual: **20 ft.**

RCRA Listings:

Date Form Received by Agency:	20181027
Handler Name:	MARIN CITY HEALTH AND WELLNESS CENTER
Handler Address:	630 DRAKE AVE
Handler City,State,Zip:	SAUSALITO, CA 94965
EPA ID:	CAL000440278
Contact Name:	SANDRA GUTIERREZ
Contact Address:	630 DRAKE AVE
Contact City,State,Zip:	SAUSALITO, CA 94965
Contact Telephone:	415-339-8813
Contact Fax:	415-339-8814
Contact Email:	SANDRA@MARINCITYCLINIC.ORG
Contact Title:	Not reported
EPA Region:	09
Land Type:	Not reported
Federal Waste Generator Description:	Not a generator, verified
Non-Notifier:	Not reported
Biennial Report Cycle:	Not reported
Accessibility:	Not reported
Active Site Indicator:	Handler Activities

MARIN CITY HEALTH AND WELLNESS CENTER (Continued) **1024871633**

State District Owner:	Not reported
State District:	Not reported
Mailing Address:	630 DRAKE AVE
Mailing City,State,Zip:	SAUSALITO, CA 94965
Owner Name:	MARIN CITY HEALTH AND WELLNESS CTR
Owner Type:	Other
Operator Name:	SANDRA GUTIERREZ
Operator Type:	Other
Short-Term Generator Activity:	No
Importer Activity:	No
Mixed Waste Generator:	No
Transporter Activity:	No
Transfer Facility Activity:	No
Recycler Activity with Storage:	No
Small Quantity On-Site Burner Exemption:	No
Smelting Melting and Refining Furnace Exemption:	No
Underground Injection Control:	No
Off-Site Waste Receipt:	No
Universal Waste Indicator:	Yes
Universal Waste Destination Facility:	Yes
Federal Universal Waste:	No
Active Site Fed-Reg Treatment Storage and Disposal Facility:	Not reported
Active Site Converter Treatment storage and Disposal Facility:	Not reported
Active Site State-Reg Treatment Storage and Disposal Facility:	Not reported
Active Site State-Reg Handler:	---
Federal Facility Indicator:	Not reported
Hazardous Secondary Material Indicator:	N
Sub-Part K Indicator:	Not reported
Commercial TSD Indicator:	No
Treatment Storage and Disposal Type:	Not reported
2018 GPRA Permit Baseline:	Not on the Baseline
2018 GPRA Renewals Baseline:	Not on the Baseline
Permit Renewals Workload Universe:	Not reported
Permit Workload Universe:	Not reported
Permit Progress Universe:	Not reported
Post-Closure Workload Universe:	Not reported
Closure Workload Universe:	Not reported
202 GPRA Corrective Action Baseline:	No
Corrective Action Workload Universe:	No
Subject to Corrective Action Universe:	No
Non-TSDFs Where RCRA CA has Been Imposed Universe:	No
TSDFs Potentially Subject to CA Under 3004 (u)/(v) Universe:	No
TSDFs Only Subject to CA under Discretionary Auth Universe:	No
Corrective Action Priority Ranking:	No NCAPS ranking
Environmental Control Indicator:	No
Institutional Control Indicator:	No
Human Exposure Controls Indicator:	N/A
Groundwater Controls Indicator:	N/A
Operating TSDF Universe:	Not reported
Full Enforcement Universe:	Not reported
Significant Non-Complier Universe:	No
Unaddressed Significant Non-Complier Universe:	No
Addressed Significant Non-Complier Universe:	No
Significant Non-Complier With a Compliance Schedule Universe:	No
Financial Assurance Required:	Not reported
Handler Date of Last Change:	20181120
Recognized Trader-Importer:	No

MARIN CITY HEALTH AND WELLNESS CENTER (Continued) **1024871633**

Recognized Trader-Exporter:	No
Importer of Spent Lead Acid Batteries:	No
Exporter of Spent Lead Acid Batteries:	No
Recycler Activity Without Storage:	No
Manifest Broker:	No
Sub-Part P Indicator:	No

Handler - Owner Operator:

Owner/Operator Indicator:	Owner
Owner/Operator Name:	MARIN CITY HEALTH AND WELLNESS CTR
Legal Status:	Other
Date Became Current:	Not reported
Date Ended Current:	Not reported
Owner/Operator Address:	630 DRAKE AVE
Owner/Operator City,State,Zip:	SAUSALITO, CA 94965
Owner/Operator Telephone:	415-339-8813
Owner/Operator Telephone Ext:	Not reported
Owner/Operator Fax:	Not reported
Owner/Operator Email:	Not reported

Owner/Operator Indicator:	Operator
Owner/Operator Name:	SANDRA GUTIERREZ
Legal Status:	Other
Date Became Current:	Not reported
Date Ended Current:	Not reported
Owner/Operator Address:	630 DRAKE AVE
Owner/Operator City,State,Zip:	SAUSALITO, CA 94965
Owner/Operator Telephone:	415-339-8813
Owner/Operator Telephone Ext:	Not reported
Owner/Operator Fax:	Not reported
Owner/Operator Email:	Not reported

Historic Generators:

Receive Date:	20181027
Handler Name:	MARIN CITY HEALTH AND WELLNESS CENTER
Federal Waste Generator Description:	Not a generator, verified
State District Owner:	Not reported
Large Quantity Handler of Universal Waste:	No
Recognized Trader Importer:	No
Recognized Trader Exporter:	No
Spent Lead Acid Battery Importer:	No
Spent Lead Acid Battery Exporter:	No
Current Record:	Yes
Non Storage Recycler Activity:	Not reported
Electronic Manifest Broker:	Not reported

List of NAICS Codes and Descriptions:

NAICS Code:	621493
NAICS Description:	FREESTANDING AMBULATORY SURGICAL AND EMERGENCY CENTERS

Facility Has Received Notices of Violations:

Violations:	No Violations Found

MARIN CITY HEALTH AND WELLNESS CENTER (Continued) **1024871633**

Evaluation Action Summary:
Evaluations: No Evaluations Found

H27 **GATEWAY CLEANERS** **DRYCLEANERS** **S110495345**
SE **160 DONAHUE ST STE G** **HWTS** **N/A**
1/8-1/4 **SAUSALITO, CA 94965**
0.152 mi.
800 ft. **Site 1 of 3 in cluster H**

Relative:
Lower

Actual:
20 ft.

DRYCLEANERS:

Name:	GATEWAY CLEANERS
Address:	160 DONAHUE ST STE G
City,State,Zip:	SAUSALITO, CA 949651269
EPA Id:	CAL000353366
NAICS Code:	81232
NAICS Description:	Drycleaning and Laundry Services (except Coin-Operated)
SIC Code:	7211
SIC Description:	Power Laundries, Family and Commercial
Create Date:	06/15/2010
Facility Active:	No
Inactive Date:	06/30/2010
Facility Addr2:	Not reported
Owner Name:	KAMHIZ SEPEHR
Owner Address:	PO BOX 861
Owner Address 2:	Not reported
Owner Telephone:	4153321120
Contact Name:	KAMHIZ SEPEHR
Contact Address:	160 DONAHUE ST STE G
Contact Address 2:	Not reported
Contact Telephone:	4153321120
Contact Fax:	Not reported
Mailing Name:	Not reported
Mailing Address 1:	PO BOX 861
Mailing Address 2:	Not reported
Mailing City:	SAUSALITO
Mailing State:	CA
Mailing Zip:	949660861
Owner Fax:	Not reported
Region Code:	2
Latitude:	37.87425
Longitude:	-122.51161

HWTS:

Name:	GATEWAY CLEANERS
Address:	160 DONAHUE ST STE G
Address 2:	Not reported
City,State,Zip:	SAUSALITO, CA 94965
EPA ID:	CAL000353366
Inactive Date:	06/30/2010
Create Date:	06/15/2010
Last Act Date:	Not reported
Mailing Name:	Not reported
Mailing Address:	PO BOX 861
Mailing Address 2:	Not reported
Mailing City,State,Zip:	SAUSALITO, CA 949660861
Owner Name:	KAMHIZ SEPEHR

GATEWAY CLEANERS (Continued) **S110495345**

Owner Address:	PO BOX 861
Owner Address 2:	Not reported
Owner City,State,Zip:	SAUSALITO, CA 949660861
Contact Name:	KAMHIZ SEPEHR
Contact Address:	160 DONAHUE ST STE G
Contact Address 2:	Not reported
City,State,Zip:	SAUSALITO, CA 949651269
Facility Status:	Inactive
Facility Type:	PERMANENT
Category:	STATE
Latitude:	37.87425
Longitude:	-122.51161

NAICS:

EPA ID:	CAL000353366
Create Date:	2010-06-15 08:56:33.603
NAICS Code:	81232
NAICS Description:	Drycleaning and Laundry Services (except Coin-Operated)
Issued EPA ID Date:	2010-06-15 08:56:33.57300
Inactive Date:	2010-06-30 00:00:00
Facility Name:	GATEWAY CLEANERS
Facility Address:	160 DONAHUE ST STE G
Facility Address 2:	Not reported
Facility City:	SAUSALITO
Facility County:	Not reported
Facility State:	CA
Facility Zip:	949651269

H28 **APOLLO CLEANERS** **CPS-SLIC** **S107473134**
SE **160 DONAHUE STREET** **BROWNFIELDS** **N/A**
1/8-1/4 **MARIN CITY, CA 94965** **CERS**
0.152 mi.
800 ft. **Site 2 of 3 in cluster H**

Relative:
Lower

Actual:
20 ft.

CPS-SLIC:

Name:	APOLLO CLEANERS
Address:	160 DONAHUE STREET
City,State,Zip:	MARIN CITY, CA 94965
Region:	STATE
Facility Status:	**Completed - Case Closed**
Status Date:	07/16/2007
Global Id:	SL0604181210
Lead Agency:	SAN FRANCISCO BAY RWQCB (REGION 2)
Lead Agency Case Number:	Not reported
Latitude:	37.87372
Longitude:	-122.511752
Case Type:	Cleanup Program Site
Case Worker:	JMJ
Local Agency:	MARIN COUNTY
RB Case Number:	21S0042
File Location:	All Files are on GeoTracker or in the Local Agency Database
Potential Media Affected:	Under Investigation
Potential Contaminants of Concern:	Tetrachloroethylene (PCE)
Site History:	Not reported

Click here to access the California GeoTracker records for this facility:

APOLLO CLEANERS (Continued) **S107473134**

BROWNFIELDS:

Name:	APOLLO CLEANERS
Address:	160 DONAHUE STREET
City,State,Zip:	MARIN CITY, CA 94965
Global ID:	SL0604181210
Latitude:	37.87372
Longitude:	-122.511752
Project Type:	Cleanup Program Site
Status:	Completed - Case Closed
Status Date:	07/16/2007
Lead Agency:	SAN FRANCISCO BAY RWQCB (REGION 2)
Last Correspondence Date:	06/23/2010
Release Type:	Unknown
Contaminant(s) of Concern:	Tetrachloroethylene (PCE)
Media of Concern:	Under Investigation
Past Use(s) that Caused Contamination:	Not reported
Human Health Exposure Controlled:	Not reported
Human Health Exposure Controlled Date:	Not reported
Groundwater Migration Controlled:	Not reported
Groundwater Migration Controlled Date:	Not reported
Primary Caseworker Name:	JOHN JANG
Primary Caseworker Organization Name:	SAN FRANCISCO BAY RWQCB (REGION 2)
Primary Caseworker Phone Number:	510-622-2366
Primary Caseworker Address:	1515 CLAY STREET; SUITE 1400
Primary Caseworker Address:	OAKLAND
Primary Caseworker Address:	C
Primary Caseworker Email:	jjang@waterboards.ca.gov

CERS:

Name:	APOLLO CLEANERS
Address:	160 DONAHUE STREET
City,State,Zip:	MARIN CITY, CA 94965
Site ID:	246372
CERS ID:	SL0604181210
CERS Description:	Cleanup Program Site

Affiliation:

Affiliation Type Desc:	Regional Board Caseworker
Entity Name:	JOHN JANG - SAN FRANCISCO BAY RWQCB (REGION 2)
Entity Title:	Not reported
Affiliation Address:	1515 CLAY STREET, SUITE 1400
Affiliation City:	OAKLAND
Affiliation State:	CA
Affiliation Country:	Not reported
Affiliation Zip:	Not reported
Affiliation Phone:	,

Affiliation Type Desc:	Local Agency Caseworker
Entity Name:	GREG MOBLEY - MARIN COUNTY
Entity Title:	Not reported
Affiliation Address:	3501 CIVIC CENTER DR.
Affiliation City:	SAN RAFAEL
Affiliation State:	CA
Affiliation Country:	Not reported
Affiliation Zip:	Not reported
Affiliation Phone:	4154996647,

H29 **GATEWAY CLEANERS** **DRYCLEANERS** **S109426697**
SE **160 DONAHUE ST UNIT G** **N/A**
1/8-1/4 **SAUSALITO, CA 94965**
0.152 mi.
800 ft. **Site 3 of 3 in cluster H**

Relative: DRYCLEANERS:
Lower

Actual: Name: GATEWAY CLEANERS
20 ft. Address: 160 DONAHUE ST UNIT G
City,State,Zip: SAUSALITO, CA 949650000
EPA Id: CAL000292067
NAICS Code: 81232
NAICS Description: Drycleaning and Laundry Services (except Coin-Operated)
SIC Code: 7211
SIC Description: Power Laundries, Family and Commercial
Create Date: 03/10/2005
Facility Active: No
Inactive Date: 06/30/2006
Facility Addr2: Not reported
Owner Name: RUSSELL LAM
Owner Address: 233 VISTA DELMAR
Owner Address 2: Not reported
Owner Telephone: 4153006286
Contact Name: RUSSELL LAM
Contact Address: 160 DONAHUE ST UNIT G
Contact Address 2: Not reported
Contact Telephone: 4153321120
Contact Fax: Not reported
Mailing Name: Not reported
Mailing Address 1: 160 DONAHUE ST UNIT G
Mailing Address 2: Not reported
Mailing City: SAUSALITO
Mailing State: CA
Mailing Zip: 949650000
Owner Fax: Not reported
Region Code: 2
Latitude: 37.874249
Longitude: -122.511643

Name: APOLLO CLEANERS
Address: 160 DONAHUE ST UNIT G
City,State,Zip: MARIN CITY, CA 949650000
EPA Id: CAL000145142
NAICS Code: 81232
NAICS Description: Drycleaning and Laundry Services (except Coin-Operated)
SIC Code: 7211
SIC Description: Power Laundries, Family and Commercial
Create Date: 03/03/1997
Facility Active: No
Inactive Date: 03/08/2005
Facility Addr2: Not reported
Owner Name: THOMAS EKUNWE
Owner Address: 160 DONAHUE ST UNIT G
Owner Address 2: Not reported
Owner Telephone: 4153321120
Contact Name: THOMAS EKUNWE, OWNER
Contact Address: 160 DONAHUE ST UNIT G
Contact Address 2: Not reported
Contact Telephone: 4153321120

GATEWAY CLEANERS (Continued) **S109426697**

Contact Fax:	Not reported
Mailing Name:	Not reported
Mailing Address 1:	160 DONAHUE ST UNIT G
Mailing Address 2:	Not reported
Mailing City:	MARIN CITY
Mailing State:	CA
Mailing Zip:	949650000
Owner Fax:	Not reported
Region Code:	2
Latitude:	37.874334
Longitude:	-122.511613

G30 **MANZANITA SCHOOL** **SWEEPS UST** **S105082855**
South **620 DRAKE AVE** **N/A**
1/8-1/4 **MARIN CITY, CA 94965**
0.173 mi.
913 ft. **Site 2 of 5 in cluster G**

Relative: SWEEPS UST:
Lower

Name:	MANZANITA SCHOOL
Address:	620 DRAKE AVE
City:	MARIN CITY
Status:	Active
Comp Number:	58573
Number:	4
Board Of Equalization:	44-013923
Referral Date:	07-01-85
Action Date:	Not reported
Created Date:	12-31-88
Owner Tank Id:	1
SWRCB Tank Id:	21-000-058573-000001
Tank Status:	A
Capacity:	1000
Active Date:	07-01-85
Tank Use:	M.V. FUEL
STG:	P
Content:	DIESEL
Number Of Tanks:	1

Actual:
20 ft.

G31 **SAUSALITO SCHOOL DIST.** **UST** **U003914747**
South **620 DRAKE AVE.** **N/A**
1/8-1/4 **SAUSALITO, CA 94965**
0.173 mi.
913 ft. **Site 3 of 5 in cluster G**

Relative: MARIN CO. UST:
Lower

Name:	SAUSALITO SCHOOL DIST.
Address:	620 DRAKE AVE.
City:	SAUSALITO
Zip:	94965
Facility Id:	Not reported
Tank Number:	Not reported
Tank Status:	Not reported
Tank Contents:	Not reported
Tank Use:	Not reported

Actual:
20 ft.

SAUSALITO SCHOOL DIST. (Continued) **U003914747**

Certficate Number: Not reported
Last Inspected: Not reported
Program: UST
Location: Not reported
Pulled Date: 4/25/1996
Reason: Not reported

G32 **MANZANITA SCHOOL** **HIST UST** **U001600736**
South **620 DRAKE AVENUE** **N/A**
1/8-1/4 **MARIN CITY, CA 94965**
0.173 mi.
913 ft. **Site 4 of 5 in cluster G**

Relative: HIST UST:
Lower
Actual:
20 ft.

Name:	MANZANITA SCHOOL
Address:	620 DRAKE AVENUE
City,State,Zip:	MARIN CITY, CA 94965
File Number:	00029374
URL:	http://geotracker.waterboards.ca.gov/ustpdfs/pdf/00029374.pdf
Region:	STATE
Facility ID:	00000058573
Facility Type:	Other
Other Type:	SCHOOL
Contact Name:	Not reported
Telephone:	4153323190
Owner Name:	SAUSALITO SCHOOL DISTRICT
Owner Address:	630 NEVADA STREET
Owner City,St,Zip:	SAUSALITO, CA 94965
Total Tanks:	0001
Tank Num:	001
Container Num:	1
Year Installed:	1978
Tank Capacity:	00001000
Tank Used for:	PRODUCT
Type of Fuel:	DIESEL
Container Construction Thickness:	Not reported
Leak Detection:	Not reported

Click here for Geo Tracker PDF:

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33 **MARILYN MACKEL** **RCRA NonGen / NLR** **1024770285**
SW **26 BURGESS CT** **CAC002990188**
1/8-1/4 **SAUSALITO, CA 94965**
0.180 mi.
953 ft.

Relative: RCRA Listings:
Higher
Actual:
107 ft.

Date Form Received by Agency:		20181121
Handler Name:	MARILYN MACKEL	
Handler Address:		26 BURGESS CT
Handler City,State,Zip:		SAUSALITO, CA 94965
EPA ID:		CAC002990188
Contact Name:		MARILYN MACKEL
Contact Address:		26 BURGESS CT
Contact City,State,Zip:		SAUSALITO, CA 94965

MARILYN MACKEL (Continued) **1024770285**

Contact Telephone:		323-807-8006
Contact Fax:		Not reported
Contact Email:		ELIZABETH.GARCIA@SYNERGYCOMPANIES.ORG
Contact Title:		Not reported
EPA Region:		09
Land Type:		Not reported
Federal Waste Generator Description:		Not a generator, verified
Non-Notifier:		Not reported
Biennial Report Cycle:		Not reported
Accessibility:		Not reported
Active Site Indicator:		Handler Activities
State District Owner:		Not reported
State District:		Not reported
Mailing Address:		26 BURGESS CT
Mailing City,State,Zip:		SAUSALITO, CA 94965
Owner Name:	MARILYN MACKEL	
Owner Type:		Other
Operator Name:	MARILYN MACKEL	
Operator Type:		Other
Short-Term Generator Activity:		No
Importer Activity:		No
Mixed Waste Generator:		No
Transporter Activity:		No
Transfer Facility Activity:		No
Recycler Activity with Storage:		No
Small Quantity On-Site Burner Exemption:		No
Smelting Melting and Refining Furnace Exemption:		No
Underground Injection Control:		No
Off-Site Waste Receipt:		No
Universal Waste Indicator:		Yes
Universal Waste Destination Facility:		Yes
Federal Universal Waste:		No
Active Site Fed-Reg Treatment Storage and Disposal Facility:		Not reported
Active Site Converter Treatment storage and Disposal Facility:		Not reported
Active Site State-Reg Treatment Storage and Disposal Facility:		Not reported
Active Site State-Reg Handler:		---
Federal Facility Indicator:		Not reported
Hazardous Secondary Material Indicator:		N
Sub-Part K Indicator:		Not reported
Commercial TSD Indicator:		No
Treatment Storage and Disposal Type:		Not reported
2018 GPRA Permit Baseline:		Not on the Baseline
2018 GPRA Renewals Baseline:		Not on the Baseline
Permit Renewals Workload Universe:		Not reported
Permit Workload Universe:		Not reported
Permit Progress Universe:		Not reported
Post-Closure Workload Universe:		Not reported
Closure Workload Universe:		Not reported
202 GPRA Corrective Action Baseline:		No
Corrective Action Workload Universe:		No
Subject to Corrective Action Universe:		No
Non-TSDFs Where RCRA CA has Been Imposed Universe:		No
TSDFs Potentially Subject to CA Under 3004 (u)/(v) Universe:		No
TSDFs Only Subject to CA under Discretionary Auth Universe:		No
Corrective Action Priority Ranking:		No NCAPS ranking
Environmental Control Indicator:		No
Institutional Control Indicator:		No

MARILYN MACKEL (Continued) **1024770285**

Human Exposure Controls Indicator: N/A
Groundwater Controls Indicator: N/A
Operating TSDF Universe: Not reported
Full Enforcement Universe: Not reported
Significant Non-Complier Universe: No
Unaddressed Significant Non-Complier Universe: No
Addressed Significant Non-Complier Universe: No
Significant Non-Complier With a Compliance Schedule Universe: No
Financial Assurance Required: Not reported
Handler Date of Last Change: 20181220
Recognized Trader-Importer: No
Recognized Trader-Exporter: No
Importer of Spent Lead Acid Batteries: No
Exporter of Spent Lead Acid Batteries: No
Recycler Activity Without Storage: No
Manifest Broker: No
Sub-Part P Indicator: No

Handler - Owner Operator:
Owner/Operator Indicator: Operator
Owner/Operator Name: MARILYN MACKEL
Legal Status: Other
Date Became Current: Not reported
Date Ended Current: Not reported
Owner/Operator Address: 26 BURGESS CT
Owner/Operator City,State,Zip: SAUSALITO, CA 94965
Owner/Operator Telephone: 323-807-8006
Owner/Operator Telephone Ext: Not reported
Owner/Operator Fax: Not reported
Owner/Operator Email: Not reported

Owner/Operator Indicator: Owner
Owner/Operator Name: MARILYN MACKEL
Legal Status: Other
Date Became Current: Not reported
Date Ended Current: Not reported
Owner/Operator Address: 26 BURGESS CT
Owner/Operator City,State,Zip: SAUSALITO, CA 94965
Owner/Operator Telephone: 323-807-8006
Owner/Operator Telephone Ext: Not reported
Owner/Operator Fax: Not reported
Owner/Operator Email: Not reported

Historic Generators:
Receive Date: 20181121
Handler Name: MARILYN MACKEL
Federal Waste Generator Description: Not a generator, verified
State District Owner: Not reported
Large Quantity Handler of Universal Waste: No
Recognized Trader Importer: No
Recognized Trader Exporter: No
Spent Lead Acid Battery Importer: No
Spent Lead Acid Battery Exporter: No
Current Record: Yes
Non Storage Recycler Activity: Not reported

MARILYN MACKEL (Continued) **1024770285**

Electronic Manifest Broker: Not reported

List of NAICS Codes and Descriptions:
NAICS Code: 56299
NAICS Description: ALL OTHER WASTE MANAGEMENT SERVICES

Facility Has Received Notices of Violations:
Violations: No Violations Found

Evaluation Action Summary:
Evaluations: No Evaluations Found

G34 **ALENA MAUNDER** **RCRA NonGen / NLR** **1027085632**
South **623 DRAKE AVENUE** **CAC003157915**
1/8-1/4 **SAUSALITO, CA 94965**
0.189 mi.
999 ft. **Site 5 of 5 in cluster G**

Relative: **Lower**
Actual: **27 ft.**

RCRA Listings:

Date Form Received by Agency:		20220121
Handler Name:	ALENA MAUNDER	
Handler Address:		623 DRAKE AVENUE
Handler City,State,Zip:		SAUSALITO, CA 94965
EPA ID:		CAC003157915
Contact Name:		ALENA MAUNDER
Contact Address:		623 DRAKE AVENUE
Contact City,State,Zip:		SAUSALITO, CA 94965
Contact Telephone:		415-286-3683
Contact Fax:		Not reported
Contact Email:		GISELLE.ESPIRITU@SYNERGYCOMPANIES.ORG
Contact Title:		Not reported
EPA Region:		09
Land Type:		Not reported
Federal Waste Generator Description:		Not a generator, verified
Non-Notifier:		Not reported
Biennial Report Cycle:		Not reported
Accessibility:		Not reported
Active Site Indicator:		Not reported
State District Owner:		Not reported
State District:		Not reported
Mailing Address:		623 DRAKE AVENUE
Mailing City,State,Zip:		SAUSALITO, CA 94965
Owner Name:	ALENA MAUNDER	
Owner Type:		Other
Operator Name:	ALENA MAUNDER	
Operator Type:		Other
Short-Term Generator Activity:		No
Importer Activity:		No
Mixed Waste Generator:		No
Transporter Activity:		No
Transfer Facility Activity:		No
Recycler Activity with Storage:		No
Small Quantity On-Site Burner Exemption:		No
Smelting Melting and Refining Furnace Exemption:		No
Underground Injection Control:		No

ALENA MAUNDER (Continued) **1027085632**

Off-Site Waste Receipt:	No
Universal Waste Indicator:	No
Universal Waste Destination Facility:	No
Federal Universal Waste:	No
Active Site Fed-Reg Treatment Storage and Disposal Facility:	Not reported
Active Site Converter Treatment storage and Disposal Facility:	Not reported
Active Site State-Reg Treatment Storage and Disposal Facility:	Not reported
Active Site State-Reg Handler:	---
Federal Facility Indicator:	Not reported
Hazardous Secondary Material Indicator:	N
Sub-Part K Indicator:	Not reported
Commercial TSD Indicator:	No
Treatment Storage and Disposal Type:	Not reported
2018 GPRA Permit Baseline:	Not on the Baseline
2018 GPRA Renewals Baseline:	Not on the Baseline
Permit Renewals Workload Universe:	Not reported
Permit Workload Universe:	Not reported
Permit Progress Universe:	Not reported
Post-Closure Workload Universe:	Not reported
Closure Workload Universe:	Not reported
202 GPRA Corrective Action Baseline:	No
Corrective Action Workload Universe:	No
Subject to Corrective Action Universe:	No
Non-TSDFs Where RCRA CA has Been Imposed Universe:	No
TSDFs Potentially Subject to CA Under 3004 (u)/(v) Universe:	No
TSDFs Only Subject to CA under Discretionary Auth Universe:	No
Corrective Action Priority Ranking:	No NCAPS ranking
Environmental Control Indicator:	No
Institutional Control Indicator:	No
Human Exposure Controls Indicator:	N/A
Groundwater Controls Indicator:	N/A
Operating TSDF Universe:	Not reported
Full Enforcement Universe:	Not reported
Significant Non-Complier Universe:	No
Unaddressed Significant Non-Complier Universe:	No
Addressed Significant Non-Complier Universe:	No
Significant Non-Complier With a Compliance Schedule Universe:	No
Financial Assurance Required: Not reported	
Handler Date of Last Change:	20220121
Recognized Trader-Importer:	No
Recognized Trader-Exporter:	No
Importer of Spent Lead Acid Batteries:	No
Exporter of Spent Lead Acid Batteries:	No
Recycler Activity Without Storage:	No
Manifest Broker:	No
Sub-Part P Indicator:	No

Handler - Owner Operator:

Owner/Operator Indicator:	Owner
Owner/Operator Name: ALENA MAUNDER	
Legal Status:	Other
Date Became Current:	Not reported
Date Ended Current:	Not reported
Owner/Operator Address:	623 DRAKE AVENUE
Owner/Operator City,State,Zip:	SAUSALITO, CA 94965
Owner/Operator Telephone:	415-286-3683

ALENA MAUNDER (Continued) **1027085632**

Owner/Operator Telephone Ext: Not reported
Owner/Operator Fax: Not reported
Owner/Operator Email: Not reported

Owner/Operator Indicator: Operator
Owner/Operator Name: ALENA MAUNDER
Legal Status: Other
Date Became Current: Not reported
Date Ended Current: Not reported
Owner/Operator Address: 623 DRAKE AVENUE
Owner/Operator City,State,Zip: SAUSALITO, CA 94965
Owner/Operator Telephone: 415-286-3683
Owner/Operator Telephone Ext: Not reported
Owner/Operator Fax: Not reported
Owner/Operator Email: Not reported

Historic Generators:
Receive Date: 20220121
Handler Name: ALENA MAUNDER
Federal Waste Generator Description: Not a generator, verified
State District Owner: Not reported
Large Quantity Handler of Universal Waste: No
Recognized Trader Importer: No
Recognized Trader Exporter: No
Spent Lead Acid Battery Importer: No
Spent Lead Acid Battery Exporter: No
Current Record: Yes
Non Storage Recycler Activity: No
Electronic Manifest Broker: No

List of NAICS Codes and Descriptions:
NAICS Code: 56299
NAICS Description: ALL OTHER WASTE MANAGEMENT SERVICES

Facility Has Received Notices of Violations:
Violations: No Violations Found

Evaluation Action Summary:
Evaluations: No Evaluations Found

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35 SHIRLEY MILLER **RCRA NonGen / NLR** **1027073800**
South 16 DUTTON COURT **CAC003145446**
1/8-1/4 SAUSALITO, CA 94465
0.227 mi.
1201 ft.

Relative: Lower
Actual: 39 ft.

RCRA Listings:
Date Form Received by Agency: 20211027
Handler Name: SHIRLEY MILLER
Handler Address: 16 DUTTON COURT
Handler City,State,Zip: SAUSALITO, CA 94465
EPA ID: CAC003145446
Contact Name: SHIRLEY MILLER
Contact Address: 16 DUTTON COURT
Contact City,State,Zip: SAUSALITO, CA 94465

SHIRLEY MILLER (Continued) **1027073800**

Contact Telephone:		707-712-1579
Contact Fax:		Not reported
Contact Email:		LAILAA@PWSEI.COM
Contact Title:		Not reported
EPA Region:		09
Land Type:		Not reported
Federal Waste Generator Description:		Not a generator, verified
Non-Notifier:		Not reported
Biennial Report Cycle:		Not reported
Accessibility:		Not reported
Active Site Indicator:		Not reported
State District Owner:		Not reported
State District:		Not reported
Mailing Address:		16 DUTTON COURT
Mailing City,State,Zip:		SAUSALITO, CA 94465
Owner Name:	SHIRLEY MILLER	
Owner Type:		Other
Operator Name:	SHIRLEY MILLER	
Operator Type:		Other
Short-Term Generator Activity:		No
Importer Activity:		No
Mixed Waste Generator:		No
Transporter Activity:		No
Transfer Facility Activity:		No
Recycler Activity with Storage:		No
Small Quantity On-Site Burner Exemption:		No
Smelting Melting and Refining Furnace Exemption:		No
Underground Injection Control:		No
Off-Site Waste Receipt:		No
Universal Waste Indicator:		No
Universal Waste Destination Facility:		No
Federal Universal Waste:		No
Active Site Fed-Reg Treatment Storage and Disposal Facility:		Not reported
Active Site Converter Treatment storage and Disposal Facility:		Not reported
Active Site State-Reg Treatment Storage and Disposal Facility:		Not reported
Active Site State-Reg Handler:		---
Federal Facility Indicator:		Not reported
Hazardous Secondary Material Indicator:		N
Sub-Part K Indicator:		Not reported
Commercial TSD Indicator:		No
Treatment Storage and Disposal Type:		Not reported
2018 GPRA Permit Baseline:		Not on the Baseline
2018 GPRA Renewals Baseline:		Not on the Baseline
Permit Renewals Workload Universe:		Not reported
Permit Workload Universe:		Not reported
Permit Progress Universe:		Not reported
Post-Closure Workload Universe:		Not reported
Closure Workload Universe:		Not reported
202 GPRA Corrective Action Baseline:		No
Corrective Action Workload Universe:		No
Subject to Corrective Action Universe:		No
Non-TSDFs Where RCRA CA has Been Imposed Universe:		No
TSDFs Potentially Subject to CA Under 3004 (u)/(v) Universe:		No
TSDFs Only Subject to CA under Discretionary Auth Universe:		No
Corrective Action Priority Ranking:		No NCAPS ranking
Environmental Control Indicator:		No
Institutional Control Indicator:		No

SHIRLEY MILLER (Continued) **1027073800**

Human Exposure Controls Indicator: N/A
Groundwater Controls Indicator: N/A
Operating TSDF Universe: Not reported
Full Enforcement Universe: Not reported
Significant Non-Complier Universe: No
Unaddressed Significant Non-Complier Universe: No
Addressed Significant Non-Complier Universe: No
Significant Non-Complier With a Compliance Schedule Universe: No
Financial Assurance Required: Not reported
Handler Date of Last Change: 20211027
Recognized Trader-Importer: No
Recognized Trader-Exporter: No
Importer of Spent Lead Acid Batteries: No
Exporter of Spent Lead Acid Batteries: No
Recycler Activity Without Storage: No
Manifest Broker: No
Sub-Part P Indicator: No

Handler - Owner Operator:
Owner/Operator Indicator: Owner
Owner/Operator Name: SHIRLEY MILLER
Legal Status: Other
Date Became Current: Not reported
Date Ended Current: Not reported
Owner/Operator Address: 16 DUTTON COURT
Owner/Operator City,State,Zip: SAUSALITO, CA 94465
Owner/Operator Telephone: 707-712-1579
Owner/Operator Telephone Ext: Not reported
Owner/Operator Fax: Not reported
Owner/Operator Email: Not reported

Owner/Operator Indicator: Operator
Owner/Operator Name: SHIRLEY MILLER
Legal Status: Other
Date Became Current: Not reported
Date Ended Current: Not reported
Owner/Operator Address: 16 DUTTON COURT
Owner/Operator City,State,Zip: SAUSALITO, CA 94465
Owner/Operator Telephone: 707-712-1579
Owner/Operator Telephone Ext: Not reported
Owner/Operator Fax: Not reported
Owner/Operator Email: Not reported

Historic Generators:
Receive Date: 20211027
Handler Name: SHIRLEY MILLER
Federal Waste Generator Description: Not a generator, verified
State District Owner: Not reported
Large Quantity Handler of Universal Waste: No
Recognized Trader Importer: No
Recognized Trader Exporter: No
Spent Lead Acid Battery Importer: No
Spent Lead Acid Battery Exporter: No
Current Record: Yes
Non Storage Recycler Activity: No

SHIRLEY MILLER (Continued) **1027073800**

Electronic Manifest Broker: No

List of NAICS Codes and Descriptions:
NAICS Code: 56299
NAICS Description: ALL OTHER WASTE MANAGEMENT SERVICES

Facility Has Received Notices of Violations:
Violations: No Violations Found

Evaluation Action Summary:
Evaluations: No Evaluations Found

I36 **CVS PHARMACY #9962** **CERS HAZ WASTE** **S121753605**
SE **150 DONAHUE STREET** **N/A**
1/8-1/4 **SAUSALITO, CA 94965**
0.240 mi.
1269 ft. **Site 1 of 2 in cluster I**

Relative:
Lower

Actual:
20 ft.

CERS HAZ WASTE:
Name: CVS PHARMACY #9962
Address: 150 DONAHUE STREET
City,State,Zip: SAUSALITO, CA 94965
Site ID: 23405
CERS ID: 10342948
CERS Description: Hazardous Waste Generator

Evaluation:
Eval General Type: Compliance Evaluation Inspection
Eval Date: 03-19-2014
Violations Found: No
Eval Type: Routine done by local agency
Eval Notes: Not reported
Eval Division: Marin County Dept of Public Works, Waste Mgmt, CUP
Eval Program: HW
Eval Source: CERS,

Eval General Type: Compliance Evaluation Inspection
Eval Date: 03-21-2017
Violations Found: No
Eval Type: Routine done by local agency
Eval Notes: Not reported
Eval Division: Marin County Dept of Public Works, Waste Mgmt, CUP
Eval Program: HW
Eval Source: CERS,

Affiliation:
Affiliation Type Desc: Environmental Contact
Entity Name: Verisk 3E, Regulatory Services/CVS
Entity Title: Not reported
Affiliation Address: 3207 Grey Hawk Ct., Ste. 200
Affiliation City: Carlsbad
Affiliation State: CA
Affiliation Country: Not reported
Affiliation Zip: 92010
Affiliation Phone: ,

CVS PHARMACY #9962 (Continued) **S121753605**

Affiliation Type Desc:	Identification Signer
Entity Name:	Crystalyn Dogui-is, Agent for Longs Drug Stores California, L.L.C.
Entity Title:	Regulatory Compliance Specialist, Verisk 3E
Affiliation Address:	Not reported
Affiliation City:	Not reported
Affiliation State:	Not reported
Affiliation Country:	Not reported
Affiliation Zip:	Not reported
Affiliation Phone:	,

Affiliation Type Desc:	Operator
Entity Name:	Longs Drug Stores California, L.L.C.
Entity Title:	Not reported
Affiliation Address:	Not reported
Affiliation City:	Not reported
Affiliation State:	Not reported
Affiliation Country:	Not reported
Affiliation Zip:	Not reported
Affiliation Phone:	(401) 765-1500,

Affiliation Type Desc:	CUPA District
Entity Name:	Marin County CUPA
Entity Title:	Not reported
Affiliation Address:	1600 Los GamosSuite 210
Affiliation City:	San Rafael
Affiliation State:	CA
Affiliation Country:	Not reported
Affiliation Zip:	94903
Affiliation Phone:	(415) 473-6647,

Affiliation Type Desc:	Facility Mailing Address
Entity Name:	Mailing Address
Entity Title:	Not reported
Affiliation Address:	CVS Health, Attn: Erin Chilinsk, Legal, One CVS Drive - MC1160
Affiliation City:	Woonsocket
Affiliation State:	RI
Affiliation Country:	Not reported
Affiliation Zip:	02895
Affiliation Phone:	,

Affiliation Type Desc:	Parent Corporation
Entity Name:	CVS Health
Entity Title:	Not reported
Affiliation Address:	Not reported
Affiliation City:	Not reported
Affiliation State:	Not reported
Affiliation Country:	Not reported
Affiliation Zip:	Not reported
Affiliation Phone:	,

Affiliation Type Desc:	Document Preparer
Entity Name:	Crystalyn Dogui-is, Agent for Longs Drug Stores California, L.L.C.
Entity Title:	Not reported
Affiliation Address:	Not reported
Affiliation City:	Not reported
Affiliation State:	Not reported
Affiliation Country:	Not reported

CVS PHARMACY #9962 (Continued) **S121753605**

Affiliation Zip: Not reported
Affiliation Phone: ,

Affiliation Type Desc: Legal Owner
Entity Name: Longs Drug Stores California, L.L.C.
Entity Title: Not reported
Affiliation Address: One CVS Drive
Affiliation City: Woonsocket
Affiliation State: RI
Affiliation Country: United States
Affiliation Zip: 02895
Affiliation Phone: (401) 765-1500,

Affiliation Type Desc: Property Owner
Entity Name: Marin Gateway Garp LLC
Entity Title: Not reported
Affiliation Address: 977 Lomas Santa Fe Dr., Ste. A
Affiliation City: Solana Beach
Affiliation State: CA
Affiliation Country: United States
Affiliation Zip: 92075
Affiliation Phone: (415) 388-4460,

Name: CVS PHARMACY #9962
Address: 150 DONAHUE STREET
City,State,Zip: SAUSALITO, CA 94965
Site ID: 23405
CERS ID: 10342948
CERS Description: RCRA LQ HW Generator

Evaluation:
Eval General Type: Compliance Evaluation Inspection
Eval Date: 03-19-2014
Violations Found: No
Eval Type: Routine done by local agency
Eval Notes: Not reported
Eval Division: Marin County Dept of Public Works, Waste Mgmt, CUP
Eval Program: HW
Eval Source: CERS,

Eval General Type: Compliance Evaluation Inspection
Eval Date: 03-21-2017
Violations Found: No
Eval Type: Routine done by local agency
Eval Notes: Not reported
Eval Division: Marin County Dept of Public Works, Waste Mgmt, CUP
Eval Program: HW
Eval Source: CERS,

Affiliation:
Affiliation Type Desc: Environmental Contact
Entity Name: Verisk 3E, Regulatory Services/CVS
Entity Title: Not reported
Affiliation Address: 3207 Grey Hawk Ct., Ste. 200
Affiliation City: Carlsbad
Affiliation State: CA

CVS PHARMACY #9962 (Continued) **S121753605**

Affiliation Country: Not reported
Affiliation Zip: 92010
Affiliation Phone: ,

Affiliation Type Desc: Identification Signer
Entity Name: Crystalyn Dogui-is, Agent for Longs Drug Stores California, L.L.C.
Entity Title: Regulatory Compliance Specialist, Verisk 3E
Affiliation Address: Not reported
Affiliation City: Not reported
Affiliation State: Not reported
Affiliation Country: Not reported
Affiliation Zip: Not reported
Affiliation Phone: ,

Affiliation Type Desc: Operator
Entity Name: Longs Drug Stores California, L.L.C.
Entity Title: Not reported
Affiliation Address: Not reported
Affiliation City: Not reported
Affiliation State: Not reported
Affiliation Country: Not reported
Affiliation Zip: Not reported
Affiliation Phone: (401) 765-1500,

Affiliation Type Desc: CUPA District
Entity Name: Marin County CUPA
Entity Title: Not reported
Affiliation Address: 1600 Los GamosSuite 210
Affiliation City: San Rafael
Affiliation State: CA
Affiliation Country: Not reported
Affiliation Zip: 94903
Affiliation Phone: (415) 473-6647,

Affiliation Type Desc: Facility Mailing Address
Entity Name: Mailing Address
Entity Title: Not reported
Affiliation Address: CVS Health, Attn: Erin Chilinsk, Legal, One CVS Drive - MC1160
Affiliation City: Woonsocket
Affiliation State: RI
Affiliation Country: Not reported
Affiliation Zip: 02895
Affiliation Phone: ,

Affiliation Type Desc: Parent Corporation
Entity Name: CVS Health
Entity Title: Not reported
Affiliation Address: Not reported
Affiliation City: Not reported
Affiliation State: Not reported
Affiliation Country: Not reported
Affiliation Zip: Not reported
Affiliation Phone: ,

Affiliation Type Desc: Document Preparer
Entity Name: Crystalyn Dogui-is, Agent for Longs Drug Stores California, L.L.C.
Entity Title: Not reported

CVS PHARMACY #9962 (Continued) **S121753605**

Affiliation Address:	Not reported
Affiliation City:	Not reported
Affiliation State:	Not reported
Affiliation Country:	Not reported
Affiliation Zip:	Not reported
Affiliation Phone:	,
Affiliation Type Desc:	Legal Owner
Entity Name:	Longs Drug Stores California, L.L.C.
Entity Title:	Not reported
Affiliation Address:	One CVS Drive
Affiliation City:	Woonsocket
Affiliation State:	RI
Affiliation Country:	United States
Affiliation Zip:	02895
Affiliation Phone:	(401) 765-1500,
Affiliation Type Desc:	Property Owner
Entity Name:	Marin Gateway Garp LLC
Entity Title:	Not reported
Affiliation Address:	977 Lomas Santa Fe Dr., Ste. A
Affiliation City:	Solana Beach
Affiliation State:	CA
Affiliation Country:	United States
Affiliation Zip:	92075
Affiliation Phone:	(415) 388-4460,

I37 **CVS PHARMACY # 9962** **RCRA-LQG** **1016168161**
SE **150 DONAHUE ST** **CAR000240622**
1/8-1/4 **SAUSALITO, CA 94965**
0.240 mi.
1269 ft. **Site 2 of 2 in cluster I**

Relative: **Lower**

Actual: **20 ft.**

RCRA Listings:

Date Form Received by Agency:		20220217
Handler Name:	CVS PHARMACY # 9962	
Handler Address:		150 DONAHUE ST
Handler City,State,Zip:		SAUSALITO, CA 94965-1250
EPA ID:		CAR000240622
Contact Name:		NICOLE WILKINSON
Contact Address:		CVS DRIVE MC2340
Contact City,State,Zip:		WOONSOCKET, RI 02895
Contact Telephone:		401-770-7132
Contact Fax:		Not reported
Contact Email:		NICOLE.WILKINSON@CVSHEALTH.COM
Contact Title:		SENIOR DIRECTOR, CORPORATE ENVIRONMENTAL HEAL
EPA Region:		09
Land Type:		Private
Federal Waste Generator Description:		Large Quantity Generator
Non-Notifier:		Not reported
Biennial Report Cycle:		2021
Accessibility:		Not reported
Active Site Indicator:		Handler Activities
State District Owner:		Not reported
State District:		Not reported
Mailing Address:		CVS DRIVE MC2340
Mailing City,State,Zip:		WOONSOCKET, RI 02895

CVS PHARMACY # 9962 (Continued) **1016168161**

Owner Name:	MARIN GATEWAY GARP LLC
Owner Type:	Private
Operator Name:	LONGS DRUG STORES CALIFORNIA, LLC
Operator Type:	Private
Short-Term Generator Activity:	No
Importer Activity:	No
Mixed Waste Generator:	No
Transporter Activity:	No
Transfer Facility Activity:	No
Recycler Activity with Storage:	No
Small Quantity On-Site Burner Exemption:	No
Smelting Melting and Refining Furnace Exemption:	No
Underground Injection Control:	No
Off-Site Waste Receipt:	No
Universal Waste Indicator:	No
Universal Waste Destination Facility:	No
Federal Universal Waste:	No
Active Site Fed-Reg Treatment Storage and Disposal Facility:	Not reported
Active Site Converter Treatment storage and Disposal Facility:	Not reported
Active Site State-Reg Treatment Storage and Disposal Facility:	Not reported
Active Site State-Reg Handler:	---
Federal Facility Indicator:	Not reported
Hazardous Secondary Material Indicator:	N
Sub-Part K Indicator:	Not reported
Commercial TSD Indicator:	No
Treatment Storage and Disposal Type:	Not reported
2018 GPRA Permit Baseline:	Not on the Baseline
2018 GPRA Renewals Baseline:	Not on the Baseline
Permit Renewals Workload Universe:	Not reported
Permit Workload Universe:	Not reported
Permit Progress Universe:	Not reported
Post-Closure Workload Universe:	Not reported
Closure Workload Universe:	Not reported
202 GPRA Corrective Action Baseline:	No
Corrective Action Workload Universe:	No
Subject to Corrective Action Universe:	No
Non-TSDFs Where RCRA CA has Been Imposed Universe:	No
TSDFs Potentially Subject to CA Under 3004 (u)/(v) Universe:	No
TSDFs Only Subject to CA under Discretionary Auth Universe:	No
Corrective Action Priority Ranking:	No NCAPS ranking
Environmental Control Indicator:	No
Institutional Control Indicator:	No
Human Exposure Controls Indicator:	N/A
Groundwater Controls Indicator:	N/A
Operating TSDF Universe:	Not reported
Full Enforcement Universe:	Not reported
Significant Non-Complier Universe:	No
Unaddressed Significant Non-Complier Universe:	No
Addressed Significant Non-Complier Universe:	No
Significant Non-Complier With a Compliance Schedule Universe:	No
Financial Assurance Required:	Not reported
Handler Date of Last Change:	20220705
Recognized Trader-Importer:	No
Recognized Trader-Exporter:	No
Importer of Spent Lead Acid Batteries:	No
Exporter of Spent Lead Acid Batteries:	No
Recycler Activity Without Storage:	No

CVS PHARMACY # 9962 (Continued) **1016168161**

Manifest Broker: No
Sub-Part P Indicator: No

Biennial: List of Years
Year: 2017

Click Here for Biennial Reporting System Data:
Year: 2015

Click Here for Biennial Reporting System Data:

Hazardous Waste Summary:
Waste Code: D001
Waste Description: IGNITABLE WASTE

Waste Code: D002
Waste Description: CORROSIVE WASTE

Waste Code: D003
Waste Description: REACTIVE WASTE

Waste Code: D005
Waste Description: BARIUM

Waste Code: D007
Waste Description: CHROMIUM

Waste Code: D009
Waste Description: MERCURY

Waste Code: D010
Waste Description: SELENIUM

Waste Code: D011
Waste Description: SILVER

Waste Code: D024
Waste Description: M-CRESOL

Waste Code: P001
Waste Description: 2H-1-BENZOPYRAN-2-ONE, 4-HYDROXY-3-(3-OXO-1-PHENYLBUTYL)-, & SALTS, WHEN PRESENT AT CONCENTRATIONS GREATER THAN 0.3% (OR) WARFARIN, & SALTS, WHEN PRESENT AT CONCENTRATIONS GREATER THAN 0.3%

Waste Code: P042
Waste Description: 1,2-BENZENEDIOL, 4-[1-HYDROXY-2-(METHYLAMINO)ETHYL]-, (R)- (OR) EPINEPHRINE

Waste Code: P075
Waste Description: NICOTINE, & SALTS (OR) PYRIDINE, 3-(1-METHYL-2-PYRROLIDINYL)-,(S)-, & SALTS

Waste Code: P081
Waste Description: 1,2,3-PROPANETRIOL, TRINITRATE (R) (OR) NITROGLYCERINE (R)

Waste Code: U002

CVS PHARMACY # 9962 (Continued) **1016168161**

Waste Description: 2-PROPANONE (I) (OR) ACETONE (I)

Waste Code: U034
Waste Description: ACETALDEHYDE, TRICHLORO- (OR) CHLORAL

Waste Code: U129
Waste Description: CYCLOHEXANE, 1,2,3,4,5,6-HEXACHLORO-, (1ALPHA, 2ALPHA, 3BETA, 4ALPHA, 5ALPHA, 6BETA)- (OR) LINDANE

Waste Code: U165
Waste Description: NAPHTHALENE

Waste Code: U188
Waste Description: PHENOL

Waste Code: U205
Waste Description: SELENIUM SULFIDE (OR) SELENIUM SULFIDE SES2 (R,T)

Handler - Owner Operator:
Owner/Operator Indicator: Operator
Owner/Operator Name: LONGS DRUG STORES CALIFORNIA, LLC
Legal Status: Private
Date Became Current: 20081022
Date Ended Current: Not reported
Owner/Operator Address: 1 CVS DRIVE
Owner/Operator City,State,Zip: WOONSOCKET, RI 02895
Owner/Operator Telephone: 401-765-1500
Owner/Operator Telephone Ext: Not reported
Owner/Operator Fax: Not reported
Owner/Operator Email: CORPORATEENVIRONMENTALTEAM@CVSHEALTH.COM

Owner/Operator Indicator: Owner
Owner/Operator Name: MARIN GATEWAY GARP LLC
Legal Status: Private
Date Became Current: 19930506
Date Ended Current: Not reported
Owner/Operator Address: 977 LOMAS SANTA FE DR STE A
Owner/Operator City,State,Zip: SOLANA BEACH, CA 92075
Owner/Operator Telephone: 401-765-1500
Owner/Operator Telephone Ext: Not reported
Owner/Operator Fax: Not reported
Owner/Operator Email: CORPORATEENVIRONMENTALTEAM@CVSHEALTH.COM

Owner/Operator Indicator: Owner
Owner/Operator Name: MARIN GATEWAY GARP LLC
Legal Status: Private
Date Became Current: 19930506
Date Ended Current: Not reported
Owner/Operator Address: 977 LOMAS SANTA FE DR STE A
Owner/Operator City,State,Zip: SOLANA BEACH, CA 92075
Owner/Operator Telephone: 415-388-4460
Owner/Operator Telephone Ext: Not reported
Owner/Operator Fax: Not reported
Owner/Operator Email: NICOLE.WILKINSON@CVSHEALTH.COM

Owner/Operator Indicator: Owner
Owner/Operator Name: MARIN GATEWAY GARP LLC

CVS PHARMACY # 9962 (Continued) **1016168161**

Legal Status:	Private
Date Became Current:	19930506
Date Ended Current:	Not reported
Owner/Operator Address:	977 LOMAS SANTA FE DR STE A
Owner/Operator City,State,Zip:	SOLANA BEACH, CA 92075
Owner/Operator Telephone:	Not reported
Owner/Operator Telephone Ext:	Not reported
Owner/Operator Fax:	Not reported
Owner/Operator Email:	Not reported

Owner/Operator Indicator:	Owner
Owner/Operator Name: MARIN GATEWAY GARP LLC	
Legal Status:	Private
Date Became Current:	19930506
Date Ended Current:	Not reported
Owner/Operator Address:	977 LOMAS SANTA FE DR
Owner/Operator City,State,Zip:	SOLANA BEACH, CA 92075
Owner/Operator Telephone:	415-388-4460
Owner/Operator Telephone Ext:	Not reported
Owner/Operator Fax:	Not reported
Owner/Operator Email:	Not reported

Owner/Operator Indicator:	Operator
Owner/Operator Name: LONGS DRUG STORES CALIFORNIA LLC	
Legal Status:	Private
Date Became Current:	20081022
Date Ended Current:	Not reported
Owner/Operator Address:	Not reported
Owner/Operator City,State,Zip:	Not reported
Owner/Operator Telephone:	Not reported
Owner/Operator Telephone Ext:	Not reported
Owner/Operator Fax:	Not reported
Owner/Operator Email:	Not reported

Owner/Operator Indicator:	Owner
Owner/Operator Name: MARIN GATEWAY GARP LLC	
Legal Status:	Private
Date Became Current:	19930506
Date Ended Current:	Not reported
Owner/Operator Address:	977 LOMAS SANTA FE DR STE A
Owner/Operator City,State,Zip:	SOLANA BEACH, CA 92075
Owner/Operator Telephone:	415-388-4460
Owner/Operator Telephone Ext:	Not reported
Owner/Operator Fax:	Not reported
Owner/Operator Email:	NICOLE.WILKINSON@CVSHEALTH.COM

Owner/Operator Indicator:	Operator
Owner/Operator Name: LONGS DRUG STORES CALIFORNIA, LLC	
Legal Status:	Private
Date Became Current:	20081022
Date Ended Current:	Not reported
Owner/Operator Address:	1 CVS DR MC2340
Owner/Operator City,State,Zip:	WOONSOCKET, RI 02895
Owner/Operator Telephone:	401-765-1500
Owner/Operator Telephone Ext:	Not reported
Owner/Operator Fax:	Not reported
Owner/Operator Email:	CORPORATEENVIRONMENTALTEAM@CVSHEALTH.COM

CVS PHARMACY # 9962 (Continued) **1016168161**

Owner/Operator Indicator: Operator
Owner/Operator Name: LONGS DRUG STORES CALIFORNIA, LLC
Legal Status: Private
Date Became Current: 20081022
Date Ended Current: Not reported
Owner/Operator Address: 1 CVS DRIVE
Owner/Operator City,State,Zip: WOONSOCKET, RI 02895
Owner/Operator Telephone: 401-765-1500
Owner/Operator Telephone Ext: Not reported
Owner/Operator Fax: Not reported
Owner/Operator Email: CORPORATEENVIRONMENTALTEAM@CVSHEALTH.COM

Owner/Operator Indicator: Operator
Owner/Operator Name: LONGS DRUG STORES CALIFORNIA, L.L.C
Legal Status: Private
Date Became Current: 20081022
Date Ended Current: Not reported
Owner/Operator Address: Not reported
Owner/Operator City,State,Zip: Not reported
Owner/Operator Telephone: Not reported
Owner/Operator Telephone Ext: Not reported
Owner/Operator Fax: Not reported
Owner/Operator Email: Not reported

Historic Generators:
Receive Date: 20160831
Handler Name: CVS PHARMACY #9962
Federal Waste Generator Description: Large Quantity Generator
State District Owner: Not reported
Large Quantity Handler of Universal Waste: No
Recognized Trader Importer: No
Recognized Trader Exporter: No
Spent Lead Acid Battery Importer: No
Spent Lead Acid Battery Exporter: No
Current Record: No
Non Storage Recycler Activity: Not reported
Electronic Manifest Broker: Not reported

Receive Date: 20180301
Handler Name: CVS PHARMACY # 9962
Federal Waste Generator Description: Large Quantity Generator
State District Owner: Not reported
Large Quantity Handler of Universal Waste: No
Recognized Trader Importer: No
Recognized Trader Exporter: No
Spent Lead Acid Battery Importer: No
Spent Lead Acid Battery Exporter: No
Current Record: No
Non Storage Recycler Activity: No
Electronic Manifest Broker: No

Receive Date: 20220217
Handler Name: CVS PHARMACY # 9962
Federal Waste Generator Description: Large Quantity Generator
State District Owner: Not reported
Large Quantity Handler of Universal Waste: No
Recognized Trader Importer: No

CVS PHARMACY # 9962 (Continued) **1016168161**

Recognized Trader Exporter: No
Spent Lead Acid Battery Importer: No
Spent Lead Acid Battery Exporter: No
Current Record: Yes
Non Storage Recycler Activity: No
Electronic Manifest Broker: No

Receive Date: 20220128
Handler Name: CVS PHARMACY # 9962
Federal Waste Generator Description: Not a generator, verified
State District Owner: Not reported
Large Quantity Handler of Universal Waste: No
Recognized Trader Importer: No
Recognized Trader Exporter: No
Spent Lead Acid Battery Importer: No
Spent Lead Acid Battery Exporter: No
Current Record: No
Non Storage Recycler Activity: No
Electronic Manifest Broker: No

Receive Date: 20130619
Handler Name: CVS PHARMACY NO 9962
Federal Waste Generator Description: Large Quantity Generator
State District Owner: Not reported
Large Quantity Handler of Universal Waste: No
Recognized Trader Importer: No
Recognized Trader Exporter: No
Spent Lead Acid Battery Importer: No
Spent Lead Acid Battery Exporter: No
Current Record: No
Non Storage Recycler Activity: Not reported
Electronic Manifest Broker: Not reported

List of NAICS Codes and Descriptions:
NAICS Code: 44611
NAICS Description: PHARMACIES AND DRUG STORES

NAICS Code: 446110
NAICS Description: PHARMACIES AND DRUG STORES

Facility Has Received Notices of Violations:
Violations: No Violations Found

Evaluation Action Summary:
Evaluations: No Evaluations Found

38 SE 1/4-1/2 0.286 mi. 1508 ft. | **FLEA MARKET PROPERTY**
100 DONAHUE ST
MARIN CITY, CA 94965 | **LUST Cortese CERS** | **S105051510 N/A**

Relative: Lower

Actual: 20 ft.

LUST:

Name:	FLEA MARKET PROPERTY
Address:	100 DONAHUE ST
City,State,Zip:	MARIN CITY, CA 94965
Lead Agency:	SAN FRANCISCO BAY RWQCB (REGION 2)
Case Type:	LUST Cleanup Site
Geo Track:	http://geotracker.waterboards.ca.gov/profile_report.asp?global_id=T0604100332
Global Id:	T0604100332
Latitude:	37.873227
Longitude:	-122.509107
Status:	Completed - Case Closed
Status Date:	06/12/1997
Case Worker:	JMJ
RB Case Number:	21-0052
Local Agency:	MARIN COUNTY
File Location:	Not reported
Local Case Number:	36
Potential Media Affect:	Other Groundwater (uses other than drinking water)
Potential Contaminants of Concern:	Gasoline
Site History:	Not reported

LUST:

Global Id:	T0604100332
Contact Type:	Regional Board Caseworker
Contact Name:	JOHN JANG
Organization Name:	SAN FRANCISCO BAY RWQCB (REGION 2)
Address:	1515 CLAY STREET, SUITE 1400
City:	OAKLAND
Email:	jjang@waterboards.ca.gov
Phone Number:	Not reported

Global Id:	T0604100332
Contact Type:	Local Agency Caseworker
Contact Name:	UNK
Organization Name:	MARIN COUNTY
Address:	Not reported
City:	r2 UNKNOWN
Email:	Not reported
Phone Number:	Not reported

LUST:

Global Id:	T0604100332
Action Type:	ENFORCEMENT
Date:	08/01/1995
Action:	13267 Requirement

Global Id:	T0604100332
Action Type:	Other
Date:	02/27/1990
Action:	Leak Discovery

Global Id:	T0604100332
Action Type:	Other

FLEA MARKET PROPERTY (Continued) **S105051510**

Date: 02/27/1990
Action: Leak Reported

Global Id: T0604100332
Action Type: ENFORCEMENT
Date: 04/07/1997
Action: Staff Letter

Global Id: T0604100332
Action Type: ENFORCEMENT
Date: 06/12/1997
Action: Closure/No Further Action Letter

Global Id: T0604100332
Action Type: ENFORCEMENT
Date: 03/03/1997
Action: 13267 Requirement

Global Id: T0604100332
Action Type: ENFORCEMENT
Date: 07/26/2000
Action: Clean Up Fund - Letter to RP

Global Id: T0604100332
Action Type: RESPONSE
Date: 06/30/1994
Action: Other Report / Document

Global Id: T0604100332
Action Type: Other
Date: 02/27/1990
Action: Leak Stopped

Global Id: T0604100332
Action Type: RESPONSE
Date: 12/28/1989
Action: Other Report / Document

Global Id: T0604100332
Action Type: RESPONSE
Date: 03/04/1996
Action: Well Destruction Report

Global Id: T0604100332
Action Type: RESPONSE
Date: 12/12/1994
Action: Monitoring Report - Semi-Annually

Global Id: T0604100332
Action Type: RESPONSE
Date: 03/20/1995
Action: Monitoring Report - Semi-Annually

Global Id: T0604100332
Action Type: RESPONSE
Date: 06/13/1991
Action: Soil and Water Investigation Report

FLEA MARKET PROPERTY (Continued) **S105051510**

Global Id: T0604100332
Action Type: RESPONSE
Date: 12/28/1989
Action: Other Report / Document

Global Id: T0604100332
Action Type: RESPONSE
Date: 11/17/1995
Action: Other Report / Document

Global Id: T0604100332
Action Type: RESPONSE
Date: 04/26/1991
Action: Other Report / Document

Global Id: T0604100332
Action Type: RESPONSE
Date: 04/26/1991
Action: Monitoring Report - Other

Global Id: T0604100332
Action Type: RESPONSE
Date: 11/08/1995
Action: Other Report / Document

Global Id: T0604100332
Action Type: RESPONSE
Date: 04/07/1997
Action: Correspondence

Global Id: T0604100332
Action Type: RESPONSE
Date: 02/23/1994
Action: Other Report / Document

Global Id: T0604100332
Action Type: RESPONSE
Date: 07/06/1990
Action: Soil and Water Investigation Workplan - Addendum

Global Id: T0604100332
Action Type: RESPONSE
Date: 04/02/1997
Action: Sensitive Receptor Survey Report

Global Id: T0604100332
Action Type: RESPONSE
Date: 05/20/1997
Action: Correspondence

Global Id: T0604100332
Action Type: RESPONSE
Date: 08/05/1994
Action: Monitoring Report - Semi-Annually

Global Id: T0604100332
Action Type: RESPONSE

FLEA MARKET PROPERTY (Continued) **S105051510**

Date: 06/01/1994
Action: Soil and Water Investigation Report

Global Id: T0604100332
Action Type: RESPONSE
Date: 08/24/1995
Action: Other Report / Document

Global Id: T0604100332
Action Type: RESPONSE
Date: 06/18/1993
Action: Other Report / Document

Global Id: T0604100332
Action Type: RESPONSE
Date: 10/11/1995
Action: Other Report / Document

LUST:
Global Id: T0604100332
Status: Open - Case Begin Date
Status Date: 10/09/1989

Global Id: T0604100332
Status: Open - Site Assessment
Status Date: 10/09/1989

Global Id: T0604100332
Status: Open - Site Assessment
Status Date: 11/15/1989

Global Id: T0604100332
Status: Completed - Case Closed
Status Date: 06/12/1997

LUST REG 2:
Region: 2
Facility Id: 21-0052
Facility Status: Case Closed
Case Number: 36
How Discovered: Tank Closure
Leak Cause: Structure Failure
Leak Source: Tank
Date Leak Confirmed: Not reported
Oversight Program: LUST
Prelim. Site Assesment Wokplan Submitted: 10/9/1989
Preliminary Site Assesment Began: 11/15/1989
Pollution Characterization Began: Not reported
Pollution Remediation Plan Submitted: Not reported
Date Remediation Action Underway: Not reported
Date Post Remedial Action Monitoring Began: Not reported

CORTESE:
Name: FLEA MARKET PROPERTY
Address: 100 DONAHUE ST

FLEA MARKET PROPERTY (Continued) **S105051510**

City,State,Zip:	MARIN CITY, CA 94965
Region:	CORTESE
Envirostor Id:	Not reported
Global ID:	T0604100332
Site/Facility Type:	LUST CLEANUP SITE
Cleanup Status:	COMPLETED - CASE CLOSED
Status Date:	Not reported
Site Code:	Not reported
Latitude:	Not reported
Longitude:	Not reported
Owner:	Not reported
Enf Type:	Not reported
Swat R:	Not reported
Flag:	active
Order No:	Not reported
Waste Discharge System No:	Not reported
Effective Date:	Not reported
Region 2:	Not reported
WID Id:	Not reported
Solid Waste Id No:	Not reported
Waste Management Uit Name:	Not reported
File Name:	Active Open

CERS:

Name:	FLEA MARKET PROPERTY
Address:	100 DONAHUE ST
City,State,Zip:	MARIN CITY, CA 94965
Site ID:	192123
CERS ID:	T0604100332
CERS Description:	Leaking Underground Storage Tank Cleanup Site

Affiliation:

Affiliation Type Desc:	Regional Board Caseworker
Entity Name:	JOHN JANG - SAN FRANCISCO BAY RWQCB (REGION 2)
Entity Title:	Not reported
Affiliation Address:	1515 CLAY STREET, SUITE 1400
Affiliation City:	OAKLAND
Affiliation State:	CA
Affiliation Country:	Not reported
Affiliation Zip:	Not reported
Affiliation Phone:	,

Affiliation Type Desc:	Local Agency Caseworker
Entity Name:	UNK - MARIN COUNTY
Entity Title:	Not reported
Affiliation Address:	Not reported
Affiliation City:	r2 UNKNOWN
Affiliation State:	CA
Affiliation Country:	Not reported
Affiliation Zip:	Not reported
Affiliation Phone:	,

39
North
1/4-1/2
0.302 mi.
1597 ft.

COMMODORE HELICOPTERS
240 BOLINAS AVENUE
MILL VALLEY, CA 94941

ENVIROSTOR **S100181586**
N/A

Relative:
Lower

Actual:
11 ft.

ENVIROSTOR:

Name:	COMMODORE HELICOPTERS
Address:	240 BOLINAS AVENUE
City,State,Zip:	MILL VALLEY, CA 94941
Facility ID:	21450003
Status:	Refer: Other Agency
Status Date:	05/27/1994
Site Code:	Not reported
Site Type:	Historical
Site Type Detailed:	* Historical
Acres:	Not reported
NPL:	NO
Regulatory Agencies:	NONE SPECIFIED
Lead Agency:	NONE SPECIFIED
Program Manager:	Not reported
Supervisor:	Referred - Not Assigned
Division Branch:	Cleanup Berkeley
Assembly:	Not reported
Senate:	Not reported
Special Program:	* Rural County Survey Program
Restricted Use:	NO
Site Mgmt Req:	NONE SPECIFIED
Funding:	Not reported
Latitude:	37.87910
Longitude:	-122.5138
APN:	NONE SPECIFIED
Past Use:	NONE SPECIFIED
Potential COC:	NONE SPECIFIED
Confirmed COC:	NONE SPECIFIED
Potential Description:	NONE SPECIFIED
Alias Name:	COLONIAL AIR (MAY HAVE BEEN PREVIOUSLY)
Alias Type:	Alternate Name
Alias Name:	RICHARDSON BAY HELIPORT (MAY HAVE BEEN)
Alias Type:	Alternate Name
Alias Name:	21450003
Alias Type:	Envirostor ID Number

Completed Info:

Completed Area Name:	PROJECT WIDE
Completed Sub Area Name:	Not reported
Completed Document Type:	* Discovery
Completed Date:	09/15/1989
Comments:	FACILITY IDENTIFIED MARIN COUNTY ENVIRONMENTAL HEATH 1986 NOTIFICATION OF DISCHARGE 5000 GALLONS OF KEROSENE LEAKED FROM UNDERGROUND TANK FACILITY DRIVE-BY NO APPARENT PROBLEM OBSERVED
Completed Area Name:	PROJECT WIDE
Completed Sub Area Name:	Not reported
Completed Document Type:	Site Screening
Completed Date:	12/15/1989
Comments:	SITE SCREENING DONE ACTION STATUS RATIONALE: THE REPORTED 5000 GALLON FUEL LEAK.
Future Area Name:	Not reported

COMMODORE HELICOPTERS (Continued) **S100181586**

Future Sub Area Name: Not reported
Future Document Type: Not reported
Future Due Date: Not reported
Schedule Area Name: Not reported
Schedule Sub Area Name: Not reported
Schedule Document Type: Not reported
Schedule Due Date: Not reported
Schedule Revised Date: Not reported

40
NNW
1/4-1/2
0.454 mi.
2397 ft.

CALTRANS MANZANITA FACILITY
40 SHORELINE HWY
MILL VALLEY, CA 94941

LUST **S100931733**
Cortese **N/A**
ENF
HIST CORTESE
CERS

Relative:
Lower

Actual:
28 ft.

LUST:
Name: CALTRANS MANZANITA FACILITY
Address: 40 SHORELINE HWY
City,State,Zip: MILL VALLEY, CA 94941
Lead Agency: SAN FRANCISCO BAY RWQCB (REGION 2)
Case Type: LUST Cleanup Site
Geo Track: http://geotracker.waterboards.ca.gov/profile_report.asp?global_id=T0604100296
Global Id: T0604100296
Latitude: 37.880659
Longitude: -122.517784
Status: Completed - Case Closed
Status Date: 06/08/1998
Case Worker: JMJ
RB Case Number: 21-0314
Local Agency: MARIN COUNTY
File Location: Not reported
Local Case Number: 21-0314
Potential Media Affect: Other Groundwater (uses other than drinking water)
Potential Contaminants of Concern: Gasoline
Site History: Not reported

LUST:
Global Id: T0604100296
Contact Type: Regional Board Caseworker
Contact Name: JOHN JANG
Organization Name: SAN FRANCISCO BAY RWQCB (REGION 2)
Address: 1515 CLAY STREET, SUITE 1400
City: OAKLAND
Email: jjang@waterboards.ca.gov
Phone Number: Not reported

Global Id: T0604100296
Contact Type: Local Agency Caseworker
Contact Name: UNK
Organization Name: MARIN COUNTY
Address: Not reported
City: r2 UNKNOWN
Email: Not reported
Phone Number: Not reported

LUST:
Global Id: T0604100296
Action Type: Other

CALTRANS MANZANITA FACILITY (Continued) **S100931733**

Date: 01/14/1997
Action: Leak Discovery

Global Id: T0604100296
Action Type: Other
Date: 02/14/1997
Action: Leak Reported

Global Id: T0604100296
Action Type: ENFORCEMENT
Date: 03/09/1998
Action: Closure/No Further Action Letter

Global Id: T0604100296
Action Type: ENFORCEMENT
Date: 06/08/1998
Action: Closure/No Further Action Letter

Global Id: T0604100296
Action Type: Other
Date: 02/14/1997
Action: Leak Stopped

LUST:
Global Id: T0604100296
Status: Open - Case Begin Date
Status Date: 01/14/1997

Global Id: T0604100296
Status: Open - Site Assessment
Status Date: 02/14/1997

Global Id: T0604100296
Status: Open - Site Assessment
Status Date: 05/07/1997

Global Id: T0604100296
Status: Completed - Case Closed
Status Date: 06/08/1998

LUST REG 2:
Region: 2
Facility Id: 21-0314
Facility Status: Case Closed
Case Number: 21-0314
How Discovered: Tank Closure
Leak Cause: UNK
Leak Source: UNK
Date Leak Confirmed: 2/14/1997
Oversight Program: LUST
Prelim. Site Assesment Wokplan Submitted: 5/7/1997
Preliminary Site Assesment Began: Not reported
Pollution Characterization Began: Not reported
Pollution Remediation Plan Submitted: Not reported
Date Remediation Action Underway: Not reported

CALTRANS MANZANITA FACILITY (Continued) **S100931733**

Date Post Remedial Action Monitoring Began: Not reported

CORTESE:

Name:	CALTRANS MANZANITA FACILITY
Address:	40 SHORELINE HWY
City,State,Zip:	MILL VALLEY, CA 94941
Region:	CORTESE
Envirostor Id:	Not reported
Global ID:	T0604100296
Site/Facility Type:	LUST CLEANUP SITE
Cleanup Status:	COMPLETED - CASE CLOSED
Status Date:	Not reported
Site Code:	Not reported
Latitude:	Not reported
Longitude:	Not reported
Owner:	Not reported
Enf Type:	Not reported
Swat R:	Not reported
Flag:	active
Order No:	Not reported
Waste Discharge System No:	Not reported
Effective Date:	Not reported
Region 2:	Not reported
WID Id:	Not reported
Solid Waste Id No:	Not reported
Waste Management Uit Name:	Not reported
File Name:	Active Open

ENF:

Name:	CALTRANS MANZANITA MAINTENANCE
Address:	40 SHORELINE HIGHWAY
City,State,Zip:	MILL VALLEY, CA
Region:	2
Facility Id:	216667
Agency Name:	CA Dept of Transportation District 4
Place Type:	Facility
Place Subtype:	Not reported
Facility Type:	All other facilities
Agency Type:	State Agency
# Of Agencies:	1
Place Latitude:	Not reported
Place Longitude:	Not reported
SIC Code 1:	Not reported
SIC Desc 1:	Not reported
SIC Code 2:	Not reported
SIC Desc 2:	Not reported
SIC Code 3:	Not reported
SIC Desc 3:	Not reported
NAICS Code 1:	Not reported
NAICS Desc 1:	Not reported
NAICS Code 2:	Not reported
NAICS Desc 2:	Not reported
NAICS Code 3:	Not reported
NAICS Desc 3:	Not reported
# Of Places:	1
Source Of Facility:	Reg Meas

CALTRANS MANZANITA FACILITY (Continued) **S100931733**

Design Flow:	Not reported
Threat To Water Quality:	Not reported
Complexity:	Not reported
Pretreatment:	Not reported
Facility Waste Type:	Not reported
Facility Waste Type 2:	Not reported
Facility Waste Type 3:	Not reported
Facility Waste Type 4:	Not reported
Program:	AGT
Program Category1:	TANKS
Program Category2:	TANKS
# Of Programs:	1
WDID:	2 21AGT452U
Reg Measure Id:	170164
Reg Measure Type:	Unregulated
Region:	2
Order #:	Not reported
Npdes# CA#:	Not reported
Major-Minor:	Not reported
Npdes Type:	Not reported
Reclamation:	Not reported
Dredge Fill Fee:	Not reported
301H:	Not reported
Application Fee Amt Received:	Not reported
Status:	Never Active
Status Date:	02/20/2013
Effective Date:	Not reported
Expiration/Review Date:	Not reported
Termination Date:	Not reported
WDR Review - Amend:	Not reported
WDR Review - Revise/Renew:	Not reported
WDR Review - Rescind:	Not reported
WDR Review - No Action Required:	Not reported
WDR Review - Pending:	Not reported
WDR Review - Planned:	Not reported
Status Enrollee:	N
Individual/General:	I
Fee Code:	Not reported
Direction/Voice:	Passive
Enforcement Id(EID):	247508
Region:	2
Order / Resolution Number:	UNKNOWN
Enforcement Action Type:	Notice of Violation
Effective Date:	06/30/2002
Adoption/Issuance Date:	Not reported
Achieve Date:	Not reported
Termination Date:	Not reported
ACL Issuance Date:	Not reported
EPL Issuance Date:	Not reported
Status:	Historical
Title:	Enforcement - 2 21AGT452U
Description:	Notice of violation of Aboveground Petroleum Storage Act and 13267 Request for a Technical Report for the Aboveground Tanks. Follows verbal and notice of noncompliance.
Program:	AGT
Latest Milestone Completion Date:	6/10/2002

CALTRANS MANZANITA FACILITY (Continued) **S100931733**

# Of Programs1:	1
Total Assessment Amount:	0
Initial Assessed Amount:	0
Liability $ Amount:	0
Project $ Amount:	0
Liability $ Paid:	0
Project $ Completed:	0
Total $ Paid/Completed Amount:	0

HIST CORTESE:

edr_fname:	CALTRANS MANZANITA FACILI
edr_fadd1:	40 SHORELINE
City,State,Zip:	MILL VALLEY, CA 94941
Region:	CORTESE
Facility County Code:	21
Reg By:	LTNKA
Reg Id:	21-0314

CERS:

Name:	CALTRANS MANZANITA FACILITY
Address:	40 SHORELINE HWY
City,State,Zip:	MILL VALLEY, CA 94941
Site ID:	257429
CERS ID:	T0604100296
CERS Description:	Leaking Underground Storage Tank Cleanup Site

Affiliation:

Affiliation Type Desc:	Local Agency Caseworker
Entity Name:	UNK - MARIN COUNTY
Entity Title:	Not reported
Affiliation Address:	Not reported
Affiliation City:	r2 UNKNOWN
Affiliation State:	CA
Affiliation Country:	Not reported
Affiliation Zip:	Not reported
Affiliation Phone:	,

Affiliation Type Desc:	Regional Board Caseworker
Entity Name:	JOHN JANG - SAN FRANCISCO BAY RWQCB (REGION 2)
Entity Title:	Not reported
Affiliation Address:	1515 CLAY STREET, SUITE 1400
Affiliation City:	OAKLAND
Affiliation State:	CA
Affiliation Country:	Not reported
Affiliation Zip:	Not reported
Affiliation Phone:	,

41
NNW
1/2-1
0.510 mi.
2695 ft.

EXXON RAS #7-0226
156 SHORE LINE WAY
MILL VALLEY, CA 92850

Notify 65 **S100179611**
N/A

Relative:
Lower

Actual:
32 ft.

NOTIFY 65:

Name:	EXXON RAS #7-0226
Address:	156 SHORE LINE WAY
City,State,Zip:	MILL VALLEY, CA 92850
Date Reported:	Not reported
Staff Initials:	Not reported
Board File Number:	Not reported
Facility Type:	Not reported
Discharge Date:	Not reported
Issue Date:	Not reported
Incident Description:	Not reported
Global ID:	Not reported
Status:	Not reported

42
ESE
1/2-1
0.726 mi.
3835 ft.

PHOTO WASTE RECYCLING
200 GATE 5 ROAD, #115
SAUSALITO, CA 94965

HWP **S104574046**
N/A

Relative:
Lower

Actual:
13 ft.

HWP:

EPA ID:	CAD981161367
Name:	PHOTO WASTE RECYCLING
Address:	200 GATE 5 ROAD, #115
Cleanup Status:	CLOSED
Latitude:	37.87017
Longitude:	-122.5012
Facility Type:	Historical - Non-Operating
Facility Size:	Not reported
Supervisor:	Not reported
Site Code:	Not reported
Senate District:	02
Assembly District:	10
Public Information Officer:	Not reported
Commercial Offsite Facility Types:	Not reported
Quarterly Update:	Not reported
Project Manager Lead:	Not reported
Project Manager:	Not reported
Permit Type:	Standardized
Permit Effective Date:	Not reported
Permit Expiration Date:	Not reported
Calenviroscreen Score:	11-15%
Total Planned Hours:	Not reported
Total Planned Amount:	Not reported
Total Actual Hours:	Not reported

Activities:

EPA ID:	CAD981161367
Facility Type:	Historical - Non-Operating
Facility Name:	PHOTO WASTE RECYCLING
Project Manager:	Not reported
Project Manager Lead:	Not reported
Supervisor:	Not reported
Facility Status:	CLOSED

PHOTO WASTE RECYCLING (Continued) **S104574046**

Activity Type:	New Variance
Permit Being Renewed:	Not reported
Permit Being Modified:	Not reported
Final Date:	1988-08-31 00:00:00
Type:	VAR
Title Description:	Permit Variance Extension
Due Date:	Not reported
Comments:	Not reported
Unit Names:	Unit1
Event Description:	New Variance - FINAL VARIANCE
Actual Date:	08/31/1988

EPA ID:	CAD981161367
Facility Type:	Historical - Non-Operating
Facility Name:	PHOTO WASTE RECYCLING
Project Manager:	Not reported
Project Manager Lead:	Not reported
Supervisor:	Not reported
Facility Status:	CLOSED
Activity Type:	New Variance
Permit Being Renewed:	Not reported
Permit Being Modified:	Not reported
Final Date:	1988-08-31 00:00:00
Type:	VAR
Title Description:	Permit Variance Extension
Due Date:	Not reported
Comments:	Not reported
Unit Names:	Unit1
Event Description:	New Variance - FINAL VARIANCE (EXPIRES)
Actual Date:	08/31/1989

EPA ID:	CAD981161367
Facility Type:	Historical - Non-Operating
Facility Name:	PHOTO WASTE RECYCLING
Project Manager:	Not reported
Project Manager Lead:	Not reported
Supervisor:	Not reported
Facility Status:	CLOSED
Activity Type:	New Variance
Permit Being Renewed:	Not reported
Permit Being Modified:	Not reported
Final Date:	1988-08-31 00:00:00
Type:	VAR
Title Description:	Permit Variance Extension
Due Date:	Not reported
Comments:	Not reported
Unit Names:	Unit1
Event Description:	New Variance - FINAL VARIANCE (EFFECTIVE)
Actual Date:	08/31/1988

Closure:

EPA ID:	CAD981161367
Facility Type:	Historical - Non-Operating
Facility Name:	PHOTO WASTE RECYCLING
Project Manager:	Not reported
Project Manager Lead:	Not reported
Supervisor:	Not reported

PHOTO WASTE RECYCLING (Continued) **S104574046**

Facility Size:	Not reported
Facility Status:	CLOSED
Activity Type:	Closure Final
Final Date:	Not reported
Type:	STND
Title Description:	Closure of Photo Waste Recycling Company
Due Date:	Not reported
Comments:	Not reported
Unit Names:	Unit1
Event Description:	Closure Final - ISSUE CLOSURE VERIFICATION
Actual Date:	02/26/1996

43
NW
1/2-1
0.885 mi.
4675 ft.

GRAHAM'S GARAGE
228 ALMONT
MILL VALLEY, CA 94941

ENVIROSTOR **S101203837**
N/A

Relative:
Lower

Actual:
36 ft.

ENVIROSTOR:

Name:	GRAHAM'S GARAGE
Address:	228 ALMONT
City,State,Zip:	MILL VALLEY, CA 94941
Facility ID:	21750009
Status:	Refer: Other Agency
Status Date:	10/06/1994
Site Code:	Not reported
Site Type:	Historical
Site Type Detailed:	* Historical
Acres:	Not reported
NPL:	NO
Regulatory Agencies:	NONE SPECIFIED
Lead Agency:	NONE SPECIFIED
Program Manager:	Not reported
Supervisor:	Referred - Not Assigned
Division Branch:	Cleanup Berkeley
Assembly:	10
Senate:	02
Special Program:	Not reported
Restricted Use:	NO
Site Mgmt Req:	NONE SPECIFIED
Funding:	Not reported
Latitude:	37.88438
Longitude:	-122.5249
APN:	05119108
Past Use:	NONE SPECIFIED
Potential COC:	* CONTAMINATED SOIL * WASTE OIL & MIXED OIL
Confirmed COC:	NONE SPECIFIED
Potential Description:	NONE SPECIFIED
Alias Name:	05119108
Alias Type:	APN
Alias Name:	21750009
Alias Type:	Envirostor ID Number

Completed Info:

Completed Area Name:	PROJECT WIDE
Completed Sub Area Name:	Not reported
Completed Document Type:	Site Screening

GRAHAM'S GARAGE (Continued) **S101203837**

Completed Date:	10/06/1994
Comments:	Oil and grease only/ underground tank
Future Area Name:	Not reported
Future Sub Area Name:	Not reported
Future Document Type:	Not reported
Future Due Date:	Not reported
Schedule Area Name:	Not reported
Schedule Sub Area Name:	Not reported
Schedule Document Type:	Not reported
Schedule Due Date:	Not reported
Schedule Revised Date:	Not reported

Count: 1 records.

ORPHAN SUMMARY

City	EDR ID	Site Name	Site Address	Zip	Database(s)
MILL VALLEY	S128861734	ONE MEDICAL GROUP, INC. - STRAWBER	750 REDWOOD HWY FRONTAGE RD #	94941	CERS HAZ WASTE

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

To maintain currency of the following federal and state databases, EDR contacts the appropriate governmental agency on a monthly or quarterly basis, as required.

Number of Days to Update: Provides confirmation that EDR is reporting records that have been updated within 90 days from the date the government agency made the information available to the public.

STANDARD ENVIRONMENTAL RECORDS

Lists of Federal NPL (Superfund) sites

NPL: National Priority List

National Priorities List (Superfund). The NPL is a subset of CERCLIS and identifies over 1,200 sites for priority cleanup under the Superfund Program. NPL sites may encompass relatively large areas. As such, EDR provides polygon coverage for over 1,000 NPL site boundaries produced by EPA's Environmental Photographic Interpretation Center (EPIC) and regional EPA offices.

Date of Government Version: 10/27/2022
Date Data Arrived at EDR: 11/01/2022
Date Made Active in Reports: 11/15/2022
Number of Days to Update: 14

Source: EPA
Telephone: N/A
Last EDR Contact: 12/01/2022
Next Scheduled EDR Contact: 04/10/2023
Data Release Frequency: Quarterly

NPL Site Boundaries

Sources:

EPA's Environmental Photographic Interpretation Center (EPIC)
Telephone: 202-564-7333

EPA Region 1
Telephone 617-918-1143

EPA Region 6
Telephone: 214-655-6659

EPA Region 3
Telephone 215-814-5418

EPA Region 7
Telephone: 913-551-7247

EPA Region 4
Telephone 404-562-8033

EPA Region 8
Telephone: 303-312-6774

EPA Region 5
Telephone 312-886-6686

EPA Region 9
Telephone: 415-947-4246

EPA Region 10
Telephone 206-553-8665

Proposed NPL: Proposed National Priority List Sites

A site that has been proposed for listing on the National Priorities List through the issuance of a proposed rule in the Federal Register. EPA then accepts public comments on the site, responds to the comments, and places on the NPL those sites that continue to meet the requirements for listing.

Date of Government Version: 10/27/2022
Date Data Arrived at EDR: 11/01/2022
Date Made Active in Reports: 11/15/2022
Number of Days to Update: 14

Source: EPA
Telephone: N/A
Last EDR Contact: 12/01/2022
Next Scheduled EDR Contact: 04/10/2023
Data Release Frequency: Quarterly

NPL LIENS: Federal Superfund Liens

Federal Superfund Liens. Under the authority granted the USEPA by CERCLA of 1980, the USEPA has the authority to file liens against real property in order to recover remedial action expenditures or when the property owner received notification of potential liability. USEPA compiles a listing of filed notices of Superfund Liens.

Date of Government Version: 10/15/1991
Date Data Arrived at EDR: 02/02/1994
Date Made Active in Reports: 03/30/1994
Number of Days to Update: 56

Source: EPA
Telephone: 202-564-4267
Last EDR Contact: 08/15/2011
Next Scheduled EDR Contact: 11/28/2011
Data Release Frequency: No Update Planned

Lists of Federal Delisted NPL sites

Delisted NPL: National Priority List Deletions

The National Oil and Hazardous Substances Pollution Contingency Plan (NCP) establishes the criteria that the EPA uses to delete sites from the NPL. In accordance with 40 CFR 300.425.(e), sites may be deleted from the NPL where no further response is appropriate.

Date of Government Version: 10/27/2022
Date Data Arrived at EDR: 11/01/2022
Date Made Active in Reports: 11/15/2022
Number of Days to Update: 14

Source: EPA
Telephone: N/A
Last EDR Contact: 12/01/2022
Next Scheduled EDR Contact: 04/10/2023
Data Release Frequency: Quarterly

Lists of Federal sites subject to CERCLA removals and CERCLA orders

FEDERAL FACILITY: Federal Facility Site Information listing

A listing of National Priority List (NPL) and Base Realignment and Closure (BRAC) sites found in the Comprehensive Environmental Response, Compensation and Liability Information System (CERCLIS) Database where EPA Federal Facilities Restoration and Reuse Office is involved in cleanup activities.

Date of Government Version: 08/25/2022
Date Data Arrived at EDR: 09/06/2022
Date Made Active in Reports: 12/05/2022
Number of Days to Update: 90

Source: Environmental Protection Agency
Telephone: 703-603-8704
Last EDR Contact: 12/21/2022
Next Scheduled EDR Contact: 04/10/2023
Data Release Frequency: Varies

SEMS: Superfund Enterprise Management System

SEMS (Superfund Enterprise Management System) tracks hazardous waste sites, potentially hazardous waste sites, and remedial activities performed in support of EPA's Superfund Program across the United States. The list was formerly know as CERCLIS, renamed to SEMS by the EPA in 2015. The list contains data on potentially hazardous waste sites that have been reported to the USEPA by states, municipalities, private companies and private persons, pursuant to Section 103 of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). This dataset also contains sites which are either proposed to or on the National Priorities List (NPL) and the sites which are in the screening and assessment phase for possible inclusion on the NPL.

Date of Government Version: 10/27/2022
Date Data Arrived at EDR: 11/01/2022
Date Made Active in Reports: 11/15/2022
Number of Days to Update: 14

Source: EPA
Telephone: 800-424-9346
Last EDR Contact: 12/01/2022
Next Scheduled EDR Contact: 01/23/2023
Data Release Frequency: Quarterly

Lists of Federal CERCLA sites with NFRAP

SEMS-ARCHIVE: Superfund Enterprise Management System Archive

SEMS-ARCHIVE (Superfund Enterprise Management System Archive) tracks sites that have no further interest under the Federal Superfund Program based on available information. The list was formerly known as the CERCLIS-NFRAP, renamed to SEMS ARCHIVE by the EPA in 2015. EPA may perform a minimal level of assessment work at a site while it is archived if site conditions change and/or new information becomes available. Archived sites have been removed and archived from the inventory of SEMS sites. Archived status indicates that, to the best of EPA's knowledge, assessment at a site has been completed and that EPA has determined no further steps will be taken to list the site on the National Priorities List (NPL), unless information indicates this decision was not appropriate or other considerations require a recommendation for listing at a later time. The decision does not necessarily mean that there is no hazard associated with a given site; it only means that. based upon available information, the location is not judged to be potential NPL site.

Date of Government Version: 10/27/2022
Date Data Arrived at EDR: 11/01/2022
Date Made Active in Reports: 11/15/2022
Number of Days to Update: 14

Source: EPA
Telephone: 800-424-9346
Last EDR Contact: 12/01/2022
Next Scheduled EDR Contact: 01/23/2023
Data Release Frequency: Quarterly

Lists of Federal RCRA facilities undergoing Corrective Action

CORRACTS: Corrective Action Report

CORRACTS identifies hazardous waste handlers with RCRA corrective action activity.

Date of Government Version: 11/21/2022
Date Data Arrived at EDR: 11/21/2022
Date Made Active in Reports: 12/05/2022
Number of Days to Update: 14

Source: EPA
Telephone: 800-424-9346
Last EDR Contact: 12/21/2022
Next Scheduled EDR Contact: 04/03/2023
Data Release Frequency: Quarterly

Lists of Federal RCRA TSD facilities

RCRA-TSDF: RCRA - Treatment, Storage and Disposal

RCRAInfo is EPA's comprehensive information system, providing access to data supporting the Resource Conservation and Recovery Act (RCRA) of 1976 and the Hazardous and Solid Waste Amendments (HSWA) of 1984. The database includes selective information on sites which generate, transport, store, treat and/or dispose of hazardous waste as defined by the Resource Conservation and Recovery Act (RCRA). Transporters are individuals or entities that move hazardous waste from the generator offsite to a facility that can recycle, treat, store, or dispose of the waste. TSDFs treat, store, or dispose of the waste.

Date of Government Version: 11/21/2022
Date Data Arrived at EDR: 11/21/2022
Date Made Active in Reports: 12/05/2022
Number of Days to Update: 14

Source: Environmental Protection Agency
Telephone: (415) 495-8895
Last EDR Contact: 12/21/2022
Next Scheduled EDR Contact: 04/03/2023
Data Release Frequency: Quarterly

Lists of Federal RCRA generators

RCRA-LQG: RCRA - Large Quantity Generators

RCRAInfo is EPA's comprehensive information system, providing access to data supporting the Resource Conservation and Recovery Act (RCRA) of 1976 and the Hazardous and Solid Waste Amendments (HSWA) of 1984. The database includes selective information on sites which generate, transport, store, treat and/or dispose of hazardous waste as defined by the Resource Conservation and Recovery Act (RCRA). Large quantity generators (LQGs) generate over 1,000 kilograms (kg) of hazardous waste, or over 1 kg of acutely hazardous waste per month.

Date of Government Version: 11/21/2022
Date Data Arrived at EDR: 11/21/2022
Date Made Active in Reports: 12/05/2022
Number of Days to Update: 14

Source: Environmental Protection Agency
Telephone: (415) 495-8895
Last EDR Contact: 12/21/2022
Next Scheduled EDR Contact: 04/03/2023
Data Release Frequency: Quarterly

RCRA-SQG: RCRA - Small Quantity Generators

RCRAInfo is EPA's comprehensive information system, providing access to data supporting the Resource Conservation and Recovery Act (RCRA) of 1976 and the Hazardous and Solid Waste Amendments (HSWA) of 1984. The database includes selective information on sites which generate, transport, store, treat and/or dispose of hazardous waste as defined by the Resource Conservation and Recovery Act (RCRA). Small quantity generators (SQGs) generate between 100 kg and 1,000 kg of hazardous waste per month.

Date of Government Version: 11/21/2022
Date Data Arrived at EDR: 11/21/2022
Date Made Active in Reports: 12/05/2022
Number of Days to Update: 14

Source: Environmental Protection Agency
Telephone: (415) 495-8895
Last EDR Contact: 12/21/2022
Next Scheduled EDR Contact: 04/03/2023
Data Release Frequency: Quarterly

RCRA-VSQG: RCRA - Very Small Quantity Generators (Formerly Conditionally Exempt Small Quantity Generators)

RCRAInfo is EPA's comprehensive information system, providing access to data supporting the Resource Conservation and Recovery Act (RCRA) of 1976 and the Hazardous and Solid Waste Amendments (HSWA) of 1984. The database includes selective information on sites which generate, transport, store, treat and/or dispose of hazardous waste as defined by the Resource Conservation and Recovery Act (RCRA). Very small quantity generators (VSQGs) generate less than 100 kg of hazardous waste, or less than 1 kg of acutely hazardous waste per month.

Date of Government Version: 11/21/2022
Date Data Arrived at EDR: 11/21/2022
Date Made Active in Reports: 12/05/2022
Number of Days to Update: 14

Source: Environmental Protection Agency
Telephone: (415) 495-8895
Last EDR Contact: 12/21/2022
Next Scheduled EDR Contact: 04/03/2023
Data Release Frequency: Quarterly

Federal institutional controls / engineering controls registries

LUCIS: Land Use Control Information System

LUCIS contains records of land use control information pertaining to the former Navy Base Realignment and Closure properties.

Date of Government Version: 08/16/2022
Date Data Arrived at EDR: 08/22/2022
Date Made Active in Reports: 10/24/2022
Number of Days to Update: 63

Source: Department of the Navy
Telephone: 843-820-7326
Last EDR Contact: 11/01/2022
Next Scheduled EDR Contact: 02/20/2023
Data Release Frequency: Varies

US ENG CONTROLS: Engineering Controls Sites List

A listing of sites with engineering controls in place. Engineering controls include various forms of caps, building foundations, liners, and treatment methods to create pathway elimination for regulated substances to enter environmental media or effect human health.

Date of Government Version: 08/15/2022
Date Data Arrived at EDR: 08/17/2022
Date Made Active in Reports: 10/24/2022
Number of Days to Update: 68

Source: Environmental Protection Agency
Telephone: 703-603-0695
Last EDR Contact: 11/16/2022
Next Scheduled EDR Contact: 03/06/2023
Data Release Frequency: Varies

US INST CONTROLS: Institutional Controls Sites List

A listing of sites with institutional controls in place. Institutional controls include administrative measures, such as groundwater use restrictions, construction restrictions, property use restrictions, and post remediation care requirements intended to prevent exposure to contaminants remaining on site. Deed restrictions are generally required as part of the institutional controls.

Date of Government Version: 08/15/2022
Date Data Arrived at EDR: 08/17/2022
Date Made Active in Reports: 10/24/2022
Number of Days to Update: 68

Source: Environmental Protection Agency
Telephone: 703-603-0695
Last EDR Contact: 11/16/2022
Next Scheduled EDR Contact: 03/06/2023
Data Release Frequency: Varies

Federal ERNS list

ERNS: Emergency Response Notification System

Emergency Response Notification System. ERNS records and stores information on reported releases of oil and hazardous substances.

Date of Government Version: 12/12/2022
Date Data Arrived at EDR: 12/14/2022
Date Made Active in Reports: 12/19/2022
Number of Days to Update: 5

Source: National Response Center, United States Coast Guard
Telephone: 202-267-2180
Last EDR Contact: 12/14/2022
Next Scheduled EDR Contact: 04/03/2023
Data Release Frequency: Quarterly

Lists of state- and tribal (Superfund) equivalent sites

RESPONSE: State Response Sites

Identifies confirmed release sites where DTSC is involved in remediation, either in a lead or oversight capacity. These confirmed release sites are generally high-priority and high potential risk.

Date of Government Version: 07/25/2022
Date Data Arrived at EDR: 07/25/2022
Date Made Active in Reports: 10/05/2022
Number of Days to Update: 72

Source: Department of Toxic Substances Control
Telephone: 916-323-3400
Last EDR Contact: 10/24/2022
Next Scheduled EDR Contact: 02/06/2023
Data Release Frequency: Quarterly

Lists of state- and tribal hazardous waste facilities

ENVIROSTOR: EnviroStor Database

The Department of Toxic Substances Control's (DTSC's) Site Mitigation and Brownfields Reuse Program's (SMBRP's) EnviroStor database identifes sites that have known contamination or sites for which there may be reasons to investigate further. The database includes the following site types: Federal Superfund sites (National Priorities List (NPL)); State Response, including Military Facilities and State Superfund; Voluntary Cleanup; and School sites. EnviroStor provides similar information to the information that was available in CalSites, and provides additional site information, including, but not limited to, identification of formerly-contaminated properties that have been released for reuse, properties where environmental deed restrictions have been recorded to prevent inappropriate land uses, and risk characterization information that is used to assess potential impacts to public health and the environment at contaminated sites.

Date of Government Version: 07/25/2022
Date Data Arrived at EDR: 07/25/2022
Date Made Active in Reports: 10/05/2022
Number of Days to Update: 72

Source: Department of Toxic Substances Control
Telephone: 916-323-3400
Last EDR Contact: 10/24/2022
Next Scheduled EDR Contact: 02/06/2023
Data Release Frequency: Quarterly

Lists of state and tribal landfills and solid waste disposal facilities

SWF/LF (SWIS): Solid Waste Information System

Active, Closed and Inactive Landfills. SWF/LF records typically contain an inve ntory of solid waste disposal facilities or landfills. These may be active or i nactive facilities or open dumps that failed to meet RCRA Section 4004 criteria for solid waste landfills or disposal sites.

Date of Government Version: 08/08/2022
Date Data Arrived at EDR: 08/08/2022
Date Made Active in Reports: 10/20/2022
Number of Days to Update: 73

Source: Department of Resources Recycling and Recovery
Telephone: 916-341-6320
Last EDR Contact: 11/03/2022
Next Scheduled EDR Contact: 02/20/2023
Data Release Frequency: Quarterly

Lists of state and tribal leaking storage tanks

LUST REG 9: Leaking Underground Storage Tank Report

Orange, Riverside, San Diego counties. For more current information, please refer to the State Water Resources Control Board's LUST database.

Date of Government Version: 03/01/2001
Date Data Arrived at EDR: 04/23/2001
Date Made Active in Reports: 05/21/2001
Number of Days to Update: 28

Source: California Regional Water Quality Control Board San Diego Region (9)
Telephone: 858-637-5595
Last EDR Contact: 09/26/2011
Next Scheduled EDR Contact: 01/09/2012
Data Release Frequency: No Update Planned

LUST: Leaking Underground Fuel Tank Report (GEOTRACKER)

Leaking Underground Storage Tank (LUST) Sites included in GeoTracker. GeoTracker is the Water Boards data management system for sites that impact, or have the potential to impact, water quality in California, with emphasis on groundwater.

Date of Government Version: 08/31/2022
Date Data Arrived at EDR: 08/31/2022
Date Made Active in Reports: 11/17/2022
Number of Days to Update: 78

Source: State Water Resources Control Board
Telephone: see region list
Last EDR Contact: 12/02/2022
Next Scheduled EDR Contact: 03/20/2023
Data Release Frequency: Quarterly

LUST REG 6L: Leaking Underground Storage Tank Case Listing

For more current information, please refer to the State Water Resources Control Board's LUST database.

Date of Government Version: 09/09/2003
Date Data Arrived at EDR: 09/10/2003
Date Made Active in Reports: 10/07/2003
Number of Days to Update: 27

Source: California Regional Water Quality Control Board Lahontan Region (6)
Telephone: 530-542-5572
Last EDR Contact: 09/12/2011
Next Scheduled EDR Contact: 12/26/2011
Data Release Frequency: No Update Planned

LUST REG 8: Leaking Underground Storage Tanks

California Regional Water Quality Control Board Santa Ana Region (8). For more current information, please refer to the State Water Resources Control Board's LUST database.

Date of Government Version: 02/14/2005
Date Data Arrived at EDR: 02/15/2005
Date Made Active in Reports: 03/28/2005
Number of Days to Update: 41

Source: California Regional Water Quality Control Board Santa Ana Region (8)
Telephone: 909-782-4496
Last EDR Contact: 08/15/2011
Next Scheduled EDR Contact: 11/28/2011
Data Release Frequency: No Update Planned

LUST REG 7: Leaking Underground Storage Tank Case Listing

Leaking Underground Storage Tank locations. Imperial, Riverside, San Diego, Santa Barbara counties.

Date of Government Version: 02/26/2004
Date Data Arrived at EDR: 02/26/2004
Date Made Active in Reports: 03/24/2004
Number of Days to Update: 27

Source: California Regional Water Quality Control Board Colorado River Basin Region (7)
Telephone: 760-776-8943
Last EDR Contact: 08/01/2011
Next Scheduled EDR Contact: 11/14/2011
Data Release Frequency: No Update Planned

LUST REG 5: Leaking Underground Storage Tank Database

Leaking Underground Storage Tank locations. Alameda, Alpine, Amador, Butte, Colusa, Contra Costa, Calveras, El Dorado, Fresno, Glenn, Kern, Kings, Lake, Lassen, Madera, Mariposa, Merced, Modoc, Napa, Nevada, Placer, Plumas, Sacramento, San Joaquin, Shasta, Solano, Stanislaus, Sutter, Tehama, Tulare, Tuolumne, Yolo, Yuba counties.

Date of Government Version: 07/01/2008
Date Data Arrived at EDR: 07/22/2008
Date Made Active in Reports: 07/31/2008
Number of Days to Update: 9

Source: California Regional Water Quality Control Board Central Valley Region (5)
Telephone: 916-464-4834
Last EDR Contact: 07/01/2011
Next Scheduled EDR Contact: 10/17/2011
Data Release Frequency: No Update Planned

LUST REG 4: Underground Storage Tank Leak List

Los Angeles, Ventura counties. For more current information, please refer to the State Water Resources Control Board's LUST database.

Date of Government Version: 09/07/2004
Date Data Arrived at EDR: 09/07/2004
Date Made Active in Reports: 10/12/2004
Number of Days to Update: 35

Source: California Regional Water Quality Control Board Los Angeles Region (4)
Telephone: 213-576-6710
Last EDR Contact: 09/06/2011
Next Scheduled EDR Contact: 12/19/2011
Data Release Frequency: No Update Planned

LUST REG 3: Leaking Underground Storage Tank Database

Leaking Underground Storage Tank locations. Monterey, San Benito, San Luis Obispo, Santa Barbara, Santa Cruz counties.

Date of Government Version: 05/19/2003
Date Data Arrived at EDR: 05/19/2003
Date Made Active in Reports: 06/02/2003
Number of Days to Update: 14

Source: California Regional Water Quality Control Board Central Coast Region (3)
Telephone: 805-542-4786
Last EDR Contact: 07/18/2011
Next Scheduled EDR Contact: 10/31/2011
Data Release Frequency: No Update Planned

LUST REG 2: Fuel Leak List

Leaking Underground Storage Tank locations. Alameda, Contra Costa, Marin, Napa, San Francisco, San Mateo, Santa Clara, Solano, Sonoma counties.

Date of Government Version: 09/30/2004
Date Data Arrived at EDR: 10/20/2004
Date Made Active in Reports: 11/19/2004
Number of Days to Update: 30

Source: California Regional Water Quality Control Board San Francisco Bay Region (2)
Telephone: 510-622-2433
Last EDR Contact: 09/19/2011
Next Scheduled EDR Contact: 01/02/2012
Data Release Frequency: No Update Planned

LUST REG 1: Active Toxic Site Investigation

Del Norte, Humboldt, Lake, Mendocino, Modoc, Siskiyou, Sonoma, Trinity counties. For more current information, please refer to the State Water Resources Control Board's LUST database.

Date of Government Version: 02/01/2001
Date Data Arrived at EDR: 02/28/2001
Date Made Active in Reports: 03/29/2001
Number of Days to Update: 29

Source: California Regional Water Quality Control Board North Coast (1)
Telephone: 707-570-3769
Last EDR Contact: 08/01/2011
Next Scheduled EDR Contact: 11/14/2011
Data Release Frequency: No Update Planned

LUST REG 6V: Leaking Underground Storage Tank Case Listing

Leaking Underground Storage Tank locations. Inyo, Kern, Los Angeles, Mono, San Bernardino counties.

Date of Government Version: 06/07/2005
Date Data Arrived at EDR: 06/07/2005
Date Made Active in Reports: 06/29/2005
Number of Days to Update: 22

Source: California Regional Water Quality Control Board Victorville Branch Office (6)
Telephone: 760-241-7365
Last EDR Contact: 09/12/2011
Next Scheduled EDR Contact: 12/26/2011
Data Release Frequency: No Update Planned

INDIAN LUST R4: Leaking Underground Storage Tanks on Indian Land

LUSTs on Indian land in Florida, Mississippi and North Carolina.

Date of Government Version: 06/02/2022
Date Data Arrived at EDR: 06/13/2022
Date Made Active in Reports: 08/31/2022
Number of Days to Update: 79

Source: EPA Region 4
Telephone: 404-562-8677
Last EDR Contact: 12/06/2022
Next Scheduled EDR Contact: 01/30/2023
Data Release Frequency: Varies

INDIAN LUST R5: Leaking Underground Storage Tanks on Indian Land

Leaking underground storage tanks located on Indian Land in Michigan, Minnesota and Wisconsin.

Date of Government Version: 04/11/2022
Date Data Arrived at EDR: 06/13/2022
Date Made Active in Reports: 08/16/2022
Number of Days to Update: 64

Source: EPA, Region 5
Telephone: 312-886-7439
Last EDR Contact: 12/06/2022
Next Scheduled EDR Contact: 01/30/2023
Data Release Frequency: Varies

INDIAN LUST R6: Leaking Underground Storage Tanks on Indian Land
LUSTs on Indian land in New Mexico and Oklahoma.

Date of Government Version: 04/28/2022
Date Data Arrived at EDR: 06/13/2022
Date Made Active in Reports: 08/16/2022
Number of Days to Update: 64

Source: EPA Region 6
Telephone: 214-665-6597
Last EDR Contact: 12/06/2022
Next Scheduled EDR Contact: 01/30/2023
Data Release Frequency: Varies

INDIAN LUST R10: Leaking Underground Storage Tanks on Indian Land
LUSTs on Indian land in Alaska, Idaho, Oregon and Washington.

Date of Government Version: 04/20/2022
Date Data Arrived at EDR: 06/13/2022
Date Made Active in Reports: 08/16/2022
Number of Days to Update: 64

Source: EPA Region 10
Telephone: 206-553-2857
Last EDR Contact: 12/06/2022
Next Scheduled EDR Contact: 01/30/2023
Data Release Frequency: Varies

INDIAN LUST R8: Leaking Underground Storage Tanks on Indian Land
LUSTs on Indian land in Colorado, Montana, North Dakota, South Dakota, Utah and Wyoming.

Date of Government Version: 04/20/2022
Date Data Arrived at EDR: 06/13/2022
Date Made Active in Reports: 08/16/2022
Number of Days to Update: 64

Source: EPA Region 8
Telephone: 303-312-6271
Last EDR Contact: 12/06/2022
Next Scheduled EDR Contact: 01/30/2023
Data Release Frequency: Varies

INDIAN LUST R1: Leaking Underground Storage Tanks on Indian Land
A listing of leaking underground storage tank locations on Indian Land.

Date of Government Version: 04/28/2021
Date Data Arrived at EDR: 06/11/2021
Date Made Active in Reports: 09/07/2021
Number of Days to Update: 88

Source: EPA Region 1
Telephone: 617-918-1313
Last EDR Contact: 10/06/2022
Next Scheduled EDR Contact: 01/30/2023
Data Release Frequency: Varies

INDIAN LUST R9: Leaking Underground Storage Tanks on Indian Land
LUSTs on Indian land in Arizona, California, New Mexico and Nevada

Date of Government Version: 04/08/2022
Date Data Arrived at EDR: 06/13/2022
Date Made Active in Reports: 08/16/2022
Number of Days to Update: 64

Source: Environmental Protection Agency
Telephone: 415-972-3372
Last EDR Contact: 12/06/2022
Next Scheduled EDR Contact: 01/30/2023
Data Release Frequency: Varies

INDIAN LUST R7: Leaking Underground Storage Tanks on Indian Land
LUSTs on Indian land in Iowa, Kansas, and Nebraska

Date of Government Version: 04/14/2022
Date Data Arrived at EDR: 06/13/2022
Date Made Active in Reports: 08/16/2022
Number of Days to Update: 64

Source: EPA Region 7
Telephone: 913-551-7003
Last EDR Contact: 12/06/2022
Next Scheduled EDR Contact: 01/30/2023
Data Release Frequency: Varies

CPS-SLIC: Statewide SLIC Cases (GEOTRACKER)

Cleanup Program Sites (CPS; also known as Site Cleanups [SC] and formerly known as Spills, Leaks, Investigations, and Cleanups [SLIC] sites) included in GeoTracker. GeoTracker is the Water Boards data management system for sites that impact, or have the potential to impact, water quality in California, with emphasis on groundwater.

Date of Government Version: 08/31/2022
Date Data Arrived at EDR: 08/31/2022
Date Made Active in Reports: 11/17/2022
Number of Days to Update: 78

Source: State Water Resources Control Board
Telephone: 866-480-1028
Last EDR Contact: 12/02/2022
Next Scheduled EDR Contact: 03/20/2023
Data Release Frequency: Varies

SLIC REG 1: Active Toxic Site Investigations

The SLIC (Spills, Leaks, Investigations and Cleanup) program is designed to protect and restore water quality from spills, leaks, and similar discharges.

Date of Government Version: 04/03/2003
Date Data Arrived at EDR: 04/07/2003
Date Made Active in Reports: 04/25/2003
Number of Days to Update: 18

Source: California Regional Water Quality Control Board, North Coast Region (1)
Telephone: 707-576-2220
Last EDR Contact: 08/01/2011
Next Scheduled EDR Contact: 11/14/2011
Data Release Frequency: No Update Planned

SLIC REG 2: Spills, Leaks, Investigation & Cleanup Cost Recovery Listing

The SLIC (Spills, Leaks, Investigations and Cleanup) program is designed to protect and restore water quality from spills, leaks, and similar discharges.

Date of Government Version: 09/30/2004
Date Data Arrived at EDR: 10/20/2004
Date Made Active in Reports: 11/19/2004
Number of Days to Update: 30

Source: Regional Water Quality Control Board San Francisco Bay Region (2)
Telephone: 510-286-0457
Last EDR Contact: 09/19/2011
Next Scheduled EDR Contact: 01/02/2012
Data Release Frequency: No Update Planned

SLIC REG 3: Spills, Leaks, Investigation & Cleanup Cost Recovery Listing

The SLIC (Spills, Leaks, Investigations and Cleanup) program is designed to protect and restore water quality from spills, leaks, and similar discharges.

Date of Government Version: 05/18/2006
Date Data Arrived at EDR: 05/18/2006
Date Made Active in Reports: 06/15/2006
Number of Days to Update: 28

Source: California Regional Water Quality Control Board Central Coast Region (3)
Telephone: 805-549-3147
Last EDR Contact: 07/18/2011
Next Scheduled EDR Contact: 10/31/2011
Data Release Frequency: No Update Planned

SLIC REG 4: Spills, Leaks, Investigation & Cleanup Cost Recovery Listing

The SLIC (Spills, Leaks, Investigations and Cleanup) program is designed to protect and restore water quality from spills, leaks, and similar discharges.

Date of Government Version: 11/17/2004
Date Data Arrived at EDR: 11/18/2004
Date Made Active in Reports: 01/04/2005
Number of Days to Update: 47

Source: Region Water Quality Control Board Los Angeles Region (4)
Telephone: 213-576-6600
Last EDR Contact: 07/01/2011
Next Scheduled EDR Contact: 10/17/2011
Data Release Frequency: No Update Planned

SLIC REG 5: Spills, Leaks, Investigation & Cleanup Cost Recovery Listing

The SLIC (Spills, Leaks, Investigations and Cleanup) program is designed to protect and restore water quality from spills, leaks, and similar discharges.

Date of Government Version: 04/01/2005
Date Data Arrived at EDR: 04/05/2005
Date Made Active in Reports: 04/21/2005
Number of Days to Update: 16

Source: Regional Water Quality Control Board Central Valley Region (5)
Telephone: 916-464-3291
Last EDR Contact: 09/12/2011
Next Scheduled EDR Contact: 12/26/2011
Data Release Frequency: No Update Planned

SLIC REG 6V: Spills, Leaks, Investigation & Cleanup Cost Recovery Listing
The SLIC (Spills, Leaks, Investigations and Cleanup) program is designed to protect and restore water quality from spills, leaks, and similar discharges.

Date of Government Version: 05/24/2005
Date Data Arrived at EDR: 05/25/2005
Date Made Active in Reports: 06/16/2005
Number of Days to Update: 22

Source: Regional Water Quality Control Board, Victorville Branch
Telephone: 619-241-6583
Last EDR Contact: 08/15/2011
Next Scheduled EDR Contact: 11/28/2011
Data Release Frequency: No Update Planned

SLIC REG 6L: SLIC Sites
The SLIC (Spills, Leaks, Investigations and Cleanup) program is designed to protect and restore water quality from spills, leaks, and similar discharges.

Date of Government Version: 09/07/2004
Date Data Arrived at EDR: 09/07/2004
Date Made Active in Reports: 10/12/2004
Number of Days to Update: 35

Source: California Regional Water Quality Control Board, Lahontan Region
Telephone: 530-542-5574
Last EDR Contact: 08/15/2011
Next Scheduled EDR Contact: 11/28/2011
Data Release Frequency: No Update Planned

SLIC REG 7: SLIC List
The SLIC (Spills, Leaks, Investigations and Cleanup) program is designed to protect and restore water quality from spills, leaks, and similar discharges.

Date of Government Version: 11/24/2004
Date Data Arrived at EDR: 11/29/2004
Date Made Active in Reports: 01/04/2005
Number of Days to Update: 36

Source: California Regional Quality Control Board, Colorado River Basin Region
Telephone: 760-346-7491
Last EDR Contact: 08/01/2011
Next Scheduled EDR Contact: 11/14/2011
Data Release Frequency: No Update Planned

SLIC REG 8: Spills, Leaks, Investigation & Cleanup Cost Recovery Listing
The SLIC (Spills, Leaks, Investigations and Cleanup) program is designed to protect and restore water quality from spills, leaks, and similar discharges.

Date of Government Version: 04/03/2008
Date Data Arrived at EDR: 04/03/2008
Date Made Active in Reports: 04/14/2008
Number of Days to Update: 11

Source: California Region Water Quality Control Board Santa Ana Region (8)
Telephone: 951-782-3298
Last EDR Contact: 09/12/2011
Next Scheduled EDR Contact: 12/26/2011
Data Release Frequency: No Update Planned

SLIC REG 9: Spills, Leaks, Investigation & Cleanup Cost Recovery Listing
The SLIC (Spills, Leaks, Investigations and Cleanup) program is designed to protect and restore water quality from spills, leaks, and similar discharges.

Date of Government Version: 09/10/2007
Date Data Arrived at EDR: 09/11/2007
Date Made Active in Reports: 09/28/2007
Number of Days to Update: 17

Source: California Regional Water Quality Control Board San Diego Region (9)
Telephone: 858-467-2980
Last EDR Contact: 08/08/2011
Next Scheduled EDR Contact: 11/21/2011
Data Release Frequency: No Update Planned

Lists of state and tribal registered storage tanks

FEMA UST: Underground Storage Tank Listing
A listing of all FEMA owned underground storage tanks.

Date of Government Version: 10/14/2021
Date Data Arrived at EDR: 11/05/2021
Date Made Active in Reports: 02/01/2022
Number of Days to Update: 88

Source: FEMA
Telephone: 202-646-5797
Last EDR Contact: 12/28/2022
Next Scheduled EDR Contact: 04/17/2023
Data Release Frequency: Varies

UST CLOSURE: Proposed Closure of Underground Storage Tank (UST) Cases

UST cases that are being considered for closure by either the State Water Resources Control Board or the Executive Director have been posted for a 60-day public comment period. UST Case Closures being proposed for consideration by the State Water Resources Control Board. These are primarily UST cases that meet closure criteria under the decisional framework in State Water Board Resolution No. 92-49 and other Board orders. UST Case Closures proposed for consideration by the Executive Director pursuant to State Water Board Resolution No. 2012-0061. These are cases that meet the criteria of the Low-Threat UST Case Closure Policy. UST Case Closure Review Denials and Approved Orders.

Date of Government Version: 08/24/2022
Date Data Arrived at EDR: 08/31/2022
Date Made Active in Reports: 11/21/2022
Number of Days to Update: 82

Source: State Water Resources Control Board
Telephone: 916-327-7844
Last EDR Contact: 12/02/2022
Next Scheduled EDR Contact: 03/20/2023
Data Release Frequency: Varies

UST: Active UST Facilities

Active UST facilities gathered from the local regulatory agencies

Date of Government Version: 08/31/2022
Date Data Arrived at EDR: 08/31/2022
Date Made Active in Reports: 11/28/2022
Number of Days to Update: 89

Source: SWRCB
Telephone: 916-341-5851
Last EDR Contact: 12/02/2022
Next Scheduled EDR Contact: 03/20/2023
Data Release Frequency: Semi-Annually

MILITARY UST SITES: Military UST Sites (GEOTRACKER)

Military ust sites

Date of Government Version: 08/31/2022
Date Data Arrived at EDR: 08/31/2022
Date Made Active in Reports: 11/17/2022
Number of Days to Update: 78

Source: State Water Resources Control Board
Telephone: 866-480-1028
Last EDR Contact: 12/02/2022
Next Scheduled EDR Contact: 03/20/2023
Data Release Frequency: Varies

AST: Aboveground Petroleum Storage Tank Facilities

A listing of aboveground storage tank petroleum storage tank locations.

Date of Government Version: 07/06/2016
Date Data Arrived at EDR: 07/12/2016
Date Made Active in Reports: 09/19/2016
Number of Days to Update: 69

Source: California Environmental Protection Agency
Telephone: 916-327-5092
Last EDR Contact: 12/06/2022
Next Scheduled EDR Contact: 03/27/2023
Data Release Frequency: Varies

INDIAN UST R4: Underground Storage Tanks on Indian Land

The Indian Underground Storage Tank (UST) database provides information about underground storage tanks on Indian land in EPA Region 4 (Alabama, Florida, Georgia, Kentucky, Mississippi, North Carolina, South Carolina, Tennessee and Tribal Nations)

Date of Government Version: 06/02/2022
Date Data Arrived at EDR: 06/13/2022
Date Made Active in Reports: 08/31/2022
Number of Days to Update: 79

Source: EPA Region 4
Telephone: 404-562-9424
Last EDR Contact: 12/06/2022
Next Scheduled EDR Contact: 01/30/2023
Data Release Frequency: Varies

INDIAN UST R10: Underground Storage Tanks on Indian Land

The Indian Underground Storage Tank (UST) database provides information about underground storage tanks on Indian land in EPA Region 10 (Alaska, Idaho, Oregon, Washington, and Tribal Nations).

Date of Government Version: 04/20/2022
Date Data Arrived at EDR: 06/13/2022
Date Made Active in Reports: 08/16/2022
Number of Days to Update: 64

Source: EPA Region 10
Telephone: 206-553-2857
Last EDR Contact: 12/06/2022
Next Scheduled EDR Contact: 01/30/2023
Data Release Frequency: Varies

INDIAN UST R7: Underground Storage Tanks on Indian Land

The Indian Underground Storage Tank (UST) database provides information about underground storage tanks on Indian land in EPA Region 7 (Iowa, Kansas, Missouri, Nebraska, and 9 Tribal Nations).

Date of Government Version: 04/14/2022
Date Data Arrived at EDR: 06/13/2022
Date Made Active in Reports: 08/16/2022
Number of Days to Update: 64

Source: EPA Region 7
Telephone: 913-551-7003
Last EDR Contact: 12/06/2022
Next Scheduled EDR Contact: 01/30/2023
Data Release Frequency: Varies

INDIAN UST R8: Underground Storage Tanks on Indian Land

The Indian Underground Storage Tank (UST) database provides information about underground storage tanks on Indian land in EPA Region 8 (Colorado, Montana, North Dakota, South Dakota, Utah, Wyoming and 27 Tribal Nations).

Date of Government Version: 04/20/2022
Date Data Arrived at EDR: 06/13/2022
Date Made Active in Reports: 08/16/2022
Number of Days to Update: 64

Source: EPA Region 8
Telephone: 303-312-6137
Last EDR Contact: 12/06/2022
Next Scheduled EDR Contact: 01/30/2023
Data Release Frequency: Varies

INDIAN UST R9: Underground Storage Tanks on Indian Land

The Indian Underground Storage Tank (UST) database provides information about underground storage tanks on Indian land in EPA Region 9 (Arizona, California, Hawaii, Nevada, the Pacific Islands, and Tribal Nations).

Date of Government Version: 04/08/2022
Date Data Arrived at EDR: 06/13/2022
Date Made Active in Reports: 08/16/2022
Number of Days to Update: 64

Source: EPA Region 9
Telephone: 415-972-3368
Last EDR Contact: 12/06/2022
Next Scheduled EDR Contact: 01/30/2023
Data Release Frequency: Varies

INDIAN UST R1: Underground Storage Tanks on Indian Land

The Indian Underground Storage Tank (UST) database provides information about underground storage tanks on Indian land in EPA Region 1 (Connecticut, Maine, Massachusetts, New Hampshire, Rhode Island, Vermont and ten Tribal Nations).

Date of Government Version: 04/07/2022
Date Data Arrived at EDR: 06/13/2022
Date Made Active in Reports: 08/16/2022
Number of Days to Update: 64

Source: EPA, Region 1
Telephone: 617-918-1313
Last EDR Contact: 12/06/2022
Next Scheduled EDR Contact: 01/30/2023
Data Release Frequency: Varies

INDIAN UST R6: Underground Storage Tanks on Indian Land

The Indian Underground Storage Tank (UST) database provides information about underground storage tanks on Indian land in EPA Region 6 (Louisiana, Arkansas, Oklahoma, New Mexico, Texas and 65 Tribes).

Date of Government Version: 04/28/2022
Date Data Arrived at EDR: 06/13/2022
Date Made Active in Reports: 08/16/2022
Number of Days to Update: 64

Source: EPA Region 6
Telephone: 214-665-7591
Last EDR Contact: 12/06/2022
Next Scheduled EDR Contact: 01/30/2023
Data Release Frequency: Varies

INDIAN UST R5: Underground Storage Tanks on Indian Land

The Indian Underground Storage Tank (UST) database provides information about underground storage tanks on Indian land in EPA Region 5 (Michigan, Minnesota and Wisconsin and Tribal Nations).

Date of Government Version: 04/11/2022
Date Data Arrived at EDR: 06/13/2022
Date Made Active in Reports: 08/16/2022
Number of Days to Update: 64

Source: EPA Region 5
Telephone: 312-886-6136
Last EDR Contact: 12/06/2022
Next Scheduled EDR Contact: 01/30/2023
Data Release Frequency: Varies

Lists of state and tribal voluntary cleanup sites

VCP: Voluntary Cleanup Program Properties

Contains low threat level properties with either confirmed or unconfirmed releases and the project proponents have request that DTSC oversee investigation and/or cleanup activities and have agreed to provide coverage for DTSC's costs.

Date of Government Version: 07/25/2022
Date Data Arrived at EDR: 07/25/2022
Date Made Active in Reports: 10/05/2022
Number of Days to Update: 72

Source: Department of Toxic Substances Control
Telephone: 916-323-3400
Last EDR Contact: 10/24/2022
Next Scheduled EDR Contact: 02/06/2023
Data Release Frequency: Quarterly

INDIAN VCP R7: Voluntary Cleanup Priority Lisitng

A listing of voluntary cleanup priority sites located on Indian Land located in Region 7.

Date of Government Version: 03/20/2008
Date Data Arrived at EDR: 04/22/2008
Date Made Active in Reports: 05/19/2008
Number of Days to Update: 27

Source: EPA, Region 7
Telephone: 913-551-7365
Last EDR Contact: 07/08/2021
Next Scheduled EDR Contact: 07/20/2009
Data Release Frequency: Varies

INDIAN VCP R1: Voluntary Cleanup Priority Listing

A listing of voluntary cleanup priority sites located on Indian Land located in Region 1.

Date of Government Version: 07/27/2015
Date Data Arrived at EDR: 09/29/2015
Date Made Active in Reports: 02/18/2016
Number of Days to Update: 142

Source: EPA, Region 1
Telephone: 617-918-1102
Last EDR Contact: 12/13/2022
Next Scheduled EDR Contact: 04/03/2023
Data Release Frequency: Varies

Lists of state and tribal brownfield sites

BROWNFIELDS: Considered Brownfieds Sites Listing

A listing of sites the SWRCB considers to be Brownfields since these are sites have come to them through the MOA Process.

Date of Government Version: 09/19/2022
Date Data Arrived at EDR: 09/19/2022
Date Made Active in Reports: 12/07/2022
Number of Days to Update: 79

Source: State Water Resources Control Board
Telephone: 916-323-7905
Last EDR Contact: 12/14/2022
Next Scheduled EDR Contact: 04/03/2023
Data Release Frequency: Quarterly

ADDITIONAL ENVIRONMENTAL RECORDS

Local Brownfield lists

US BROWNFIELDS: A Listing of Brownfields Sites

Brownfields are real property, the expansion, redevelopment, or reuse of which may be complicated by the presence or potential presence of a hazardous substance, pollutant, or contaminant. Cleaning up and reinvesting in these properties takes development pressures off of undeveloped, open land, and both improves and protects the environment. Assessment, Cleanup and Redevelopment Exchange System (ACRES) stores information reported by EPA Brownfields grant recipients on brownfields properties assessed or cleaned up with grant funding as well as information on Targeted Brownfields Assessments performed by EPA Regions. A listing of ACRES Brownfield sites is obtained from Cleanups in My Community. Cleanups in My Community provides information on Brownfields properties for which information is reported back to EPA, as well as areas served by Brownfields grant programs.

Date of Government Version: 02/23/2022
Date Data Arrived at EDR: 03/10/2022
Date Made Active in Reports: 03/10/2022
Number of Days to Update: 0

Source: Environmental Protection Agency
Telephone: 202-566-2777
Last EDR Contact: 12/07/2022
Next Scheduled EDR Contact: 03/27/2023
Data Release Frequency: Semi-Annually

Local Lists of Landfill / Solid Waste Disposal Sites

WMUDS/SWAT: Waste Management Unit Database

Waste Management Unit Database System. WMUDS is used by the State Water Resources Control Board staff and the Regional Water Quality Control Boards for program tracking and inventory of waste management units. WMUDS is composed of the following databases: Facility Information, Scheduled Inspections Information, Waste Management Unit Information, SWAT Program Information, SWAT Report Summary Information, SWAT Report Summary Data, Chapter 15 (formerly Subchapter 15) Information, Chapter 15 Monitoring Parameters, TPCA Program Information, RCRA Program Information, Closure Information, and Interested Parties Information.

Date of Government Version: 04/01/2000
Date Data Arrived at EDR: 04/10/2000
Date Made Active in Reports: 05/10/2000
Number of Days to Update: 30

Source: State Water Resources Control Board
Telephone: 916-227-4448
Last EDR Contact: 10/20/2022
Next Scheduled EDR Contact: 02/06/2023
Data Release Frequency: No Update Planned

SWRCY: Recycler Database

A listing of recycling facilities in California.

Date of Government Version: 08/31/2022
Date Data Arrived at EDR: 08/31/2022
Date Made Active in Reports: 11/18/2022
Number of Days to Update: 79

Source: Department of Conservation
Telephone: 916-323-3836
Last EDR Contact: 12/02/2022
Next Scheduled EDR Contact: 03/20/2023
Data Release Frequency: Quarterly

HAULERS: Registered Waste Tire Haulers Listing

A listing of registered waste tire haulers.

Date of Government Version: 08/12/2022
Date Data Arrived at EDR: 08/16/2022
Date Made Active in Reports: 08/26/2022
Number of Days to Update: 10

Source: Integrated Waste Management Board
Telephone: 916-341-6422
Last EDR Contact: 11/15/2022
Next Scheduled EDR Contact: 02/20/2023
Data Release Frequency: Varies

INDIAN ODI: Report on the Status of Open Dumps on Indian Lands

Location of open dumps on Indian land.

Date of Government Version: 12/31/1998
Date Data Arrived at EDR: 12/03/2007
Date Made Active in Reports: 01/24/2008
Number of Days to Update: 52

Source: Environmental Protection Agency
Telephone: 703-308-8245
Last EDR Contact: 10/20/2022
Next Scheduled EDR Contact: 02/06/2023
Data Release Frequency: Varies

DEBRIS REGION 9: Torres Martinez Reservation Illegal Dump Site Locations

A listing of illegal dump sites location on the Torres Martinez Indian Reservation located in eastern Riverside County and northern Imperial County, California.

Date of Government Version: 01/12/2009
Date Data Arrived at EDR: 05/07/2009
Date Made Active in Reports: 09/21/2009
Number of Days to Update: 137

Source: EPA, Region 9
Telephone: 415-947-4219
Last EDR Contact: 10/11/2022
Next Scheduled EDR Contact: 01/30/2023
Data Release Frequency: No Update Planned

ODI: Open Dump Inventory

An open dump is defined as a disposal facility that does not comply with one or more of the Part 257 or Part 258 Subtitle D Criteria.

Date of Government Version: 06/30/1985
Date Data Arrived at EDR: 08/09/2004
Date Made Active in Reports: 09/17/2004
Number of Days to Update: 39

Source: Environmental Protection Agency
Telephone: 800-424-9346
Last EDR Contact: 06/09/2004
Next Scheduled EDR Contact: N/A
Data Release Frequency: No Update Planned

IHS OPEN DUMPS: Open Dumps on Indian Land
A listing of all open dumps located on Indian Land in the United States.

Date of Government Version: 04/01/2014
Date Data Arrived at EDR: 08/06/2014
Date Made Active in Reports: 01/29/2015
Number of Days to Update: 176
Source: Department of Health & Human Serivces, Indian Health Service
Telephone: 301-443-1452
Last EDR Contact: 10/28/2022
Next Scheduled EDR Contact: 02/06/2023
Data Release Frequency: Varies

Local Lists of Hazardous waste / Contaminated Sites

US HIST CDL: National Clandestine Laboratory Register
A listing of clandestine drug lab locations that have been removed from the DEAs National Clandestine Laboratory Register.

Date of Government Version: 07/29/2022
Date Data Arrived at EDR: 08/18/2022
Date Made Active in Reports: 10/24/2022
Number of Days to Update: 67
Source: Drug Enforcement Administration
Telephone: 202-307-1000
Last EDR Contact: 11/16/2022
Next Scheduled EDR Contact: 03/06/2023
Data Release Frequency: No Update Planned

HIST CAL-SITES: Calsites Database
The Calsites database contains potential or confirmed hazardous substance release properties. In 1996, California EPA reevaluated and significantly reduced the number of sites in the Calsites database. No longer updated by the state agency. It has been replaced by ENVIROSTOR.

Date of Government Version: 08/08/2005
Date Data Arrived at EDR: 08/03/2006
Date Made Active in Reports: 08/24/2006
Number of Days to Update: 21
Source: Department of Toxic Substance Control
Telephone: 916-323-3400
Last EDR Contact: 02/23/2009
Next Scheduled EDR Contact: 05/25/2009
Data Release Frequency: No Update Planned

SCH: School Property Evaluation Program
This category contains proposed and existing school sites that are being evaluated by DTSC for possible hazardous materials contamination. In some cases, these properties may be listed in the CalSites category depending on the level of threat to public health and safety or the environment they pose.

Date of Government Version: 07/25/2022
Date Data Arrived at EDR: 07/25/2022
Date Made Active in Reports: 10/05/2022
Number of Days to Update: 72
Source: Department of Toxic Substances Control
Telephone: 916-323-3400
Last EDR Contact: 10/24/2022
Next Scheduled EDR Contact: 02/06/2023
Data Release Frequency: Quarterly

CDL: Clandestine Drug Labs
A listing of drug lab locations. Listing of a location in this database does not indicate that any illegal drug lab materials were or were not present there, and does not constitute a determination that the location either requires or does not require additional cleanup work.

Date of Government Version: 12/31/2019
Date Data Arrived at EDR: 01/20/2021
Date Made Active in Reports: 04/08/2021
Number of Days to Update: 78
Source: Department of Toxic Substances Control
Telephone: 916-255-6504
Last EDR Contact: 11/23/2022
Next Scheduled EDR Contact: 02/13/2023
Data Release Frequency: Varies

TOXIC PITS: Toxic Pits Cleanup Act Sites
Toxic PITS Cleanup Act Sites. TOXIC PITS identifies sites suspected of containing hazardous substances where cleanup has not yet been completed.

Date of Government Version: 07/01/1995
Date Data Arrived at EDR: 08/30/1995
Date Made Active in Reports: 09/26/1995
Number of Days to Update: 27
Source: State Water Resources Control Board
Telephone: 916-227-4364
Last EDR Contact: 01/26/2009
Next Scheduled EDR Contact: 04/27/2009
Data Release Frequency: No Update Planned

CERS HAZ WASTE: CERS HAZ WASTE

List of sites in the California Environmental Protection Agency (CalEPA) Regulated Site Portal which fall under the Hazardous Chemical Management, Hazardous Waste Onsite Treatment, Household Hazardous Waste Collection, Hazardous Waste Generator, and RCRA LQ HW Generator programs.

Date of Government Version: 07/18/2022
Date Data Arrived at EDR: 07/18/2022
Date Made Active in Reports: 09/30/2022
Number of Days to Update: 74

Source: CalEPA
Telephone: 916-323-2514
Last EDR Contact: 10/17/2022
Next Scheduled EDR Contact: 01/30/2023
Data Release Frequency: Quarterly

US CDL: Clandestine Drug Labs

A listing of clandestine drug lab locations. The U.S. Department of Justice ("the Department") provides this web site as a public service. It contains addresses of some locations where law enforcement agencies reported they found chemicals or other items that indicated the presence of either clandestine drug laboratories or dumpsites. In most cases, the source of the entries is not the Department, and the Department has not verified the entry and does not guarantee its accuracy. Members of the public must verify the accuracy of all entries by, for example, contacting local law enforcement and local health departments.

Date of Government Version: 07/29/2022
Date Data Arrived at EDR: 08/18/2022
Date Made Active in Reports: 10/24/2022
Number of Days to Update: 67

Source: Drug Enforcement Administration
Telephone: 202-307-1000
Last EDR Contact: 11/16/2022
Next Scheduled EDR Contact: 03/06/2023
Data Release Frequency: Quarterly

Local Lists of Registered Storage Tanks

SWEEPS UST: SWEEPS UST Listing

Statewide Environmental Evaluation and Planning System. This underground storage tank listing was updated and maintained by a company contacted by the SWRCB in the early 1990's. The listing is no longer updated or maintained. The local agency is the contact for more information on a site on the SWEEPS list.

Date of Government Version: 06/01/1994
Date Data Arrived at EDR: 07/07/2005
Date Made Active in Reports: 08/11/2005
Number of Days to Update: 35

Source: State Water Resources Control Board
Telephone: N/A
Last EDR Contact: 06/03/2005
Next Scheduled EDR Contact: N/A
Data Release Frequency: No Update Planned

HIST UST: Hazardous Substance Storage Container Database

The Hazardous Substance Storage Container Database is a historical listing of UST sites. Refer to local/county source for current data.

Date of Government Version: 10/15/1990
Date Data Arrived at EDR: 01/25/1991
Date Made Active in Reports: 02/12/1991
Number of Days to Update: 18

Source: State Water Resources Control Board
Telephone: 916-341-5851
Last EDR Contact: 07/26/2001
Next Scheduled EDR Contact: N/A
Data Release Frequency: No Update Planned

SAN FRANCISCO AST: Aboveground Storage Tank Site Listing

Aboveground storage tank sites

Date of Government Version: 08/04/2022
Date Data Arrived at EDR: 08/04/2022
Date Made Active in Reports: 10/20/2022
Number of Days to Update: 77

Source: San Francisco County Department of Public Health
Telephone: 415-252-3896
Last EDR Contact: 10/26/2022
Next Scheduled EDR Contact: 02/16/2023
Data Release Frequency: Varies

CA FID UST: Facility Inventory Database

The Facility Inventory Database (FID) contains a historical listing of active and inactive underground storage tank locations from the State Water Resource Control Board. Refer to local/county source for current data.

Date of Government Version: 10/31/1994
Date Data Arrived at EDR: 09/05/1995
Date Made Active in Reports: 09/29/1995
Number of Days to Update: 24

Source: California Environmental Protection Agency
Telephone: 916-341-5851
Last EDR Contact: 12/28/1998
Next Scheduled EDR Contact: N/A
Data Release Frequency: No Update Planned

CERS TANKS: California Environmental Reporting System (CERS) Tanks

List of sites in the California Environmental Protection Agency (CalEPA) Regulated Site Portal which fall under the Aboveground Petroleum Storage and Underground Storage Tank regulatory programs.

Date of Government Version: 07/18/2022
Date Data Arrived at EDR: 07/18/2022
Date Made Active in Reports: 09/30/2022
Number of Days to Update: 74

Source: California Environmental Protection Agency
Telephone: 916-323-2514
Last EDR Contact: 10/17/2022
Next Scheduled EDR Contact: 01/30/2023
Data Release Frequency: Quarterly

Local Land Records

LIENS: Environmental Liens Listing

A listing of property locations with environmental liens for California where DTSC is a lien holder.

Date of Government Version: 08/23/2022
Date Data Arrived at EDR: 08/24/2022
Date Made Active in Reports: 11/14/2022
Number of Days to Update: 82

Source: Department of Toxic Substances Control
Telephone: 916-323-3400
Last EDR Contact: 12/19/2022
Next Scheduled EDR Contact: 03/13/2023
Data Release Frequency: Varies

LIENS 2: CERCLA Lien Information

A Federal CERCLA ('Superfund') lien can exist by operation of law at any site or property at which EPA has spent Superfund monies. These monies are spent to investigate and address releases and threatened releases of contamination. CERCLIS provides information as to the identity of these sites and properties.

Date of Government Version: 10/27/2022
Date Data Arrived at EDR: 11/01/2022
Date Made Active in Reports: 11/15/2022
Number of Days to Update: 14

Source: Environmental Protection Agency
Telephone: 202-564-6023
Last EDR Contact: 12/01/2022
Next Scheduled EDR Contact: 04/10/2023
Data Release Frequency: Semi-Annually

DEED: Deed Restriction Listing

Site Mitigation and Brownfields Reuse Program Facility Sites with Deed Restrictions & Hazardous Waste Management Program Facility Sites with Deed / Land Use Restriction. The DTSC Site Mitigation and Brownfields Reuse Program (SMBRP) list includes sites cleaned up under the program's oversight and generally does not include current or former hazardous waste facilities that required a hazardous waste facility permit. The list represents deed restrictions that are active. Some sites have multiple deed restrictions. The DTSC Hazardous Waste Management Program (HWMP) has developed a list of current or former hazardous waste facilities that have a recorded land use restriction at the local county recorder's office. The land use restrictions on this list were required by the DTSC HWMP as a result of the presence of hazardous substances that remain on site after the facility (or part of the facility) has been closed or cleaned up. The types of land use restriction include deed notice, deed restriction, or a land use restriction that binds current and future owners.

Date of Government Version: 08/25/2022
Date Data Arrived at EDR: 08/25/2022
Date Made Active in Reports: 11/14/2022
Number of Days to Update: 81

Source: DTSC and SWRCB
Telephone: 916-323-3400
Last EDR Contact: 11/29/2022
Next Scheduled EDR Contact: 03/13/2023
Data Release Frequency: Semi-Annually

Records of Emergency Release Reports

HMIRS: Hazardous Materials Information Reporting System
Hazardous Materials Incident Report System. HMIRS contains hazardous material spill incidents reported to DOT.

Date of Government Version: 09/19/2022
Date Data Arrived at EDR: 09/19/2022
Date Made Active in Reports: 09/30/2022
Number of Days to Update: 11

Source: U.S. Department of Transportation
Telephone: 202-366-4555
Last EDR Contact: 12/14/2022
Next Scheduled EDR Contact: 04/03/2023
Data Release Frequency: Quarterly

CHMIRS: California Hazardous Material Incident Report System
California Hazardous Material Incident Reporting System. CHMIRS contains information on reported hazardous material incidents (accidental releases or spills).

Date of Government Version: 06/30/2022
Date Data Arrived at EDR: 07/18/2022
Date Made Active in Reports: 09/30/2022
Number of Days to Update: 74

Source: Office of Emergency Services
Telephone: 916-845-8400
Last EDR Contact: 10/17/2022
Next Scheduled EDR Contact: 01/30/2023
Data Release Frequency: Semi-Annually

LDS: Land Disposal Sites Listing (GEOTRACKER)
Land Disposal sites (Landfills) included in GeoTracker. GeoTracker is the Water Boards data management system for sites that impact, or have the potential to impact, water quality in California, with emphasis on groundwater.

Date of Government Version: 08/31/2022
Date Data Arrived at EDR: 08/31/2022
Date Made Active in Reports: 11/17/2022
Number of Days to Update: 78

Source: State Water Qualilty Control Board
Telephone: 866-480-1028
Last EDR Contact: 12/02/2022
Next Scheduled EDR Contact: 03/20/2023
Data Release Frequency: Quarterly

MCS: Military Cleanup Sites Listing (GEOTRACKER)
Military sites (consisting of: Military UST sites; Military Privatized sites; and Military Cleanup sites [formerly known as DoD non UST]) included in GeoTracker. GeoTracker is the Water Boards data management system for sites that impact, or have the potential to impact, water quality in California, with emphasis on groundwater.

Date of Government Version: 08/31/2022
Date Data Arrived at EDR: 08/31/2022
Date Made Active in Reports: 11/17/2022
Number of Days to Update: 78

Source: State Water Resources Control Board
Telephone: 866-480-1028
Last EDR Contact: 12/02/2022
Next Scheduled EDR Contact: 03/20/2023
Data Release Frequency: Quarterly

SPILLS 90: SPILLS90 data from FirstSearch
Spills 90 includes those spill and release records available exclusively from FirstSearch databases. Typically, they may include chemical, oil and/or hazardous substance spills recorded after 1990. Duplicate records that are already included in EDR incident and release records are not included in Spills 90.

Date of Government Version: 06/06/2012
Date Data Arrived at EDR: 01/03/2013
Date Made Active in Reports: 02/22/2013
Number of Days to Update: 50

Source: FirstSearch
Telephone: N/A
Last EDR Contact: 01/03/2013
Next Scheduled EDR Contact: N/A
Data Release Frequency: No Update Planned

Other Ascertainable Records

RCRA NonGen / NLR: RCRA - Non Generators / No Longer Regulated
RCRAInfo is EPA's comprehensive information system, providing access to data supporting the Resource Conservation and Recovery Act (RCRA) of 1976 and the Hazardous and Solid Waste Amendments (HSWA) of 1984. The database includes selective information on sites which generate, transport, store, treat and/or dispose of hazardous waste as defined by the Resource Conservation and Recovery Act (RCRA). Non-Generators do not presently generate hazardous waste.

Date of Government Version: 11/21/2022
Date Data Arrived at EDR: 11/21/2022
Date Made Active in Reports: 12/05/2022
Number of Days to Update: 14

Source: Environmental Protection Agency
Telephone: (415) 495-8895
Last EDR Contact: 12/21/2022
Next Scheduled EDR Contact: 04/03/2023
Data Release Frequency: Quarterly

FUDS: Formerly Used Defense Sites

The listing includes locations of Formerly Used Defense Sites properties where the US Army Corps of Engineers is actively working or will take necessary cleanup actions.

Date of Government Version: 08/11/2022
Date Data Arrived at EDR: 08/11/2022
Date Made Active in Reports: 09/30/2022
Number of Days to Update: 50

Source: U.S. Army Corps of Engineers
Telephone: 202-528-4285
Last EDR Contact: 11/10/2022
Next Scheduled EDR Contact: 02/27/2023
Data Release Frequency: Varies

DOD: Department of Defense Sites

This data set consists of federally owned or administered lands, administered by the Department of Defense, that have any area equal to or greater than 640 acres of the United States, Puerto Rico, and the U.S. Virgin Islands.

Date of Government Version: 06/07/2021
Date Data Arrived at EDR: 07/13/2021
Date Made Active in Reports: 03/09/2022
Number of Days to Update: 239

Source: USGS
Telephone: 888-275-8747
Last EDR Contact: 10/13/2022
Next Scheduled EDR Contact: 01/23/2023
Data Release Frequency: Varies

FEDLAND: Federal and Indian Lands

Federally and Indian administrated lands of the United States. Lands included are administrated by: Army Corps of Engineers, Bureau of Reclamation, National Wild and Scenic River, National Wildlife Refuge, Public Domain Land, Wilderness, Wilderness Study Area, Wildlife Management Area, Bureau of Indian Affairs, Bureau of Land Management, Department of Justice, Forest Service, Fish and Wildlife Service, National Park Service.

Date of Government Version: 04/02/2018
Date Data Arrived at EDR: 04/11/2018
Date Made Active in Reports: 11/06/2019
Number of Days to Update: 574

Source: U.S. Geological Survey
Telephone: 888-275-8747
Last EDR Contact: 10/03/2022
Next Scheduled EDR Contact: 01/16/2023
Data Release Frequency: N/A

SCRD DRYCLEANERS: State Coalition for Remediation of Drycleaners Listing

The State Coalition for Remediation of Drycleaners was established in 1998, with support from the U.S. EPA Office of Superfund Remediation and Technology Innovation. It is comprised of representatives of states with established drycleaner remediation programs. Currently the member states are Alabama, Connecticut, Florida, Illinois, Kansas, Minnesota, Missouri, North Carolina, Oregon, South Carolina, Tennessee, Texas, and Wisconsin.

Date of Government Version: 01/01/2017
Date Data Arrived at EDR: 02/03/2017
Date Made Active in Reports: 04/07/2017
Number of Days to Update: 63

Source: Environmental Protection Agency
Telephone: 615-532-8599
Last EDR Contact: 11/03/2022
Next Scheduled EDR Contact: 02/20/2023
Data Release Frequency: Varies

US FIN ASSUR: Financial Assurance Information

All owners and operators of facilities that treat, store, or dispose of hazardous waste are required to provide proof that they will have sufficient funds to pay for the clean up, closure, and post-closure care of their facilities.

Date of Government Version: 09/19/2022
Date Data Arrived at EDR: 09/20/2022
Date Made Active in Reports: 12/22/2022
Number of Days to Update: 93

Source: Environmental Protection Agency
Telephone: 202-566-1917
Last EDR Contact: 12/14/2022
Next Scheduled EDR Contact: 04/03/2023
Data Release Frequency: Quarterly

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

EPA WATCH LIST: EPA WATCH LIST

EPA maintains a "Watch List" to facilitate dialogue between EPA, state and local environmental agencies on enforcement matters relating to facilities with alleged violations identified as either significant or high priority. Being on the Watch List does not mean that the facility has actually violated the law only that an investigation by EPA or a state or local environmental agency has led those organizations to allege that an unproven violation has in fact occurred. Being on the Watch List does not represent a higher level of concern regarding the alleged violations that were detected, but instead indicates cases requiring additional dialogue between EPA, state and local agencies - primarily because of the length of time the alleged violation has gone unaddressed or unresolved.

Date of Government Version: 08/30/2013
Date Data Arrived at EDR: 03/21/2014
Date Made Active in Reports: 06/17/2014
Number of Days to Update: 88

Source: Environmental Protection Agency
Telephone: 617-520-3000
Last EDR Contact: 10/28/2022
Next Scheduled EDR Contact: 02/16/2023
Data Release Frequency: Quarterly

2020 COR ACTION: 2020 Corrective Action Program List

The EPA has set ambitious goals for the RCRA Corrective Action program by creating the 2020 Corrective Action Universe. This RCRA cleanup baseline includes facilities expected to need corrective action. The 2020 universe contains a wide variety of sites. Some properties are heavily contaminated while others were contaminated but have since been cleaned up. Still others have not been fully investigated yet, and may require little or no remediation. Inclusion in the 2020 Universe does not necessarily imply failure on the part of a facility to meet its RCRA obligations.

Date of Government Version: 09/30/2017
Date Data Arrived at EDR: 05/08/2018
Date Made Active in Reports: 07/20/2018
Number of Days to Update: 73

Source: Environmental Protection Agency
Telephone: 703-308-4044
Last EDR Contact: 10/28/2022
Next Scheduled EDR Contact: 02/16/2023
Data Release Frequency: Varies

TSCA: Toxic Substances Control Act

Toxic Substances Control Act. TSCA identifies manufacturers and importers of chemical substances included on the TSCA Chemical Substance Inventory list. It includes data on the production volume of these substances by plant site.

Date of Government Version: 12/31/2016
Date Data Arrived at EDR: 06/17/2020
Date Made Active in Reports: 09/10/2020
Number of Days to Update: 85

Source: EPA
Telephone: 202-260-5521
Last EDR Contact: 12/12/2022
Next Scheduled EDR Contact: 03/27/2023
Data Release Frequency: Every 4 Years

TRIS: Toxic Chemical Release Inventory System

Toxic Release Inventory System. TRIS identifies facilities which release toxic chemicals to the air, water and land in reportable quantities under SARA Title III Section 313.

Date of Government Version: 12/31/2018
Date Data Arrived at EDR: 08/14/2020
Date Made Active in Reports: 11/04/2020
Number of Days to Update: 82

Source: EPA
Telephone: 202-566-0250
Last EDR Contact: 11/01/2022
Next Scheduled EDR Contact: 02/27/2023
Data Release Frequency: Annually

SSTS: Section 7 Tracking Systems

Section 7 of the Federal Insecticide, Fungicide and Rodenticide Act, as amended (92 Stat. 829) requires all registered pesticide-producing establishments to submit a report to the Environmental Protection Agency by March 1st each year. Each establishment must report the types and amounts of pesticides, active ingredients and devices being produced, and those having been produced and sold or distributed in the past year.

Date of Government Version: 07/18/2022
Date Data Arrived at EDR: 07/18/2022
Date Made Active in Reports: 07/29/2022
Number of Days to Update: 11

Source: EPA
Telephone: 202-564-4203
Last EDR Contact: 10/18/2022
Next Scheduled EDR Contact: 01/30/2023
Data Release Frequency: Annually

ROD: Records Of Decision

Record of Decision. ROD documents mandate a permanent remedy at an NPL (Superfund) site containing technical and health information to aid in the cleanup.

Date of Government Version: 10/27/2022
Date Data Arrived at EDR: 11/01/2022
Date Made Active in Reports: 11/15/2022
Number of Days to Update: 14

Source: EPA
Telephone: 703-416-0223
Last EDR Contact: 12/01/2022
Next Scheduled EDR Contact: 03/13/2023
Data Release Frequency: Annually

RMP: Risk Management Plans

When Congress passed the Clean Air Act Amendments of 1990, it required EPA to publish regulations and guidance for chemical accident prevention at facilities using extremely hazardous substances. The Risk Management Program Rule (RMP Rule) was written to implement Section 112(r) of these amendments. The rule, which built upon existing industry codes and standards, requires companies of all sizes that use certain flammable and toxic substances to develop a Risk Management Program, which includes a(n): Hazard assessment that details the potential effects of an accidental release, an accident history of the last five years, and an evaluation of worst-case and alternative accidental releases; Prevention program that includes safety precautions and maintenance, monitoring, and employee training measures; and Emergency response program that spells out emergency health care, employee training measures and procedures for informing the public and response agencies (e.g the fire department) should an accident occur.

Date of Government Version: 04/27/2022
Date Data Arrived at EDR: 05/04/2022
Date Made Active in Reports: 05/10/2022
Number of Days to Update: 6

Source: Environmental Protection Agency
Telephone: 202-564-8600
Last EDR Contact: 10/27/2022
Next Scheduled EDR Contact: 01/30/2023
Data Release Frequency: Varies

RAATS: RCRA Administrative Action Tracking System

RCRA Administration Action Tracking System. RAATS contains records based on enforcement actions issued under RCRA pertaining to major violators and includes administrative and civil actions brought by the EPA. For administration actions after September 30, 1995, data entry in the RAATS database was discontinued. EPA will retain a copy of the database for historical records. It was necessary to terminate RAATS because a decrease in agency resources made it impossible to continue to update the information contained in the database.

Date of Government Version: 04/17/1995
Date Data Arrived at EDR: 07/03/1995
Date Made Active in Reports: 08/07/1995
Number of Days to Update: 35

Source: EPA
Telephone: 202-564-4104
Last EDR Contact: 06/02/2008
Next Scheduled EDR Contact: 09/01/2008
Data Release Frequency: No Update Planned

PRP: Potentially Responsible Parties

A listing of verified Potentially Responsible Parties

Date of Government Version: 10/27/2022
Date Data Arrived at EDR: 11/01/2022
Date Made Active in Reports: 11/15/2022
Number of Days to Update: 14

Source: EPA
Telephone: 202-564-6023
Last EDR Contact: 12/01/2022
Next Scheduled EDR Contact: 02/16/2023
Data Release Frequency: Quarterly

PADS: PCB Activity Database System

PCB Activity Database. PADS Identifies generators, transporters, commercial storers and/or brokers and disposers of PCB's who are required to notify the EPA of such activities.

Date of Government Version: 01/20/2022
Date Data Arrived at EDR: 01/20/2022
Date Made Active in Reports: 03/25/2022
Number of Days to Update: 64

Source: EPA
Telephone: 202-566-0500
Last EDR Contact: 10/06/2022
Next Scheduled EDR Contact: 01/16/2023
Data Release Frequency: Annually

ICIS: Integrated Compliance Information System

The Integrated Compliance Information System (ICIS) supports the information needs of the national enforcement and compliance program as well as the unique needs of the National Pollutant Discharge Elimination System (NPDES) program.

Date of Government Version: 11/18/2016
Date Data Arrived at EDR: 11/23/2016
Date Made Active in Reports: 02/10/2017
Number of Days to Update: 79

Source: Environmental Protection Agency
Telephone: 202-564-2501
Last EDR Contact: 12/28/2022
Next Scheduled EDR Contact: 04/17/2023
Data Release Frequency: Quarterly

FTTS: FIFRA/ TSCA Tracking System - FIFRA (Federal Insecticide, Fungicide, & Rodenticide Act)/TSCA (Toxic Substances Control Act)

FTTS tracks administrative cases and pesticide enforcement actions and compliance activities related to FIFRA, TSCA and EPCRA (Emergency Planning and Community Right-to-Know Act). To maintain currency, EDR contacts the Agency on a quarterly basis.

Date of Government Version: 04/09/2009
Date Data Arrived at EDR: 04/16/2009
Date Made Active in Reports: 05/11/2009
Number of Days to Update: 25

Source: EPA/Office of Prevention, Pesticides and Toxic Substances
Telephone: 202-566-1667
Last EDR Contact: 08/18/2017
Next Scheduled EDR Contact: 12/04/2017
Data Release Frequency: No Update Planned

FTTS INSP: FIFRA/ TSCA Tracking System - FIFRA (Federal Insecticide, Fungicide, & Rodenticide Act)/TSCA (Toxic Substances Control Act)

A listing of FIFRA/TSCA Tracking System (FTTS) inspections and enforcements.

Date of Government Version: 04/09/2009
Date Data Arrived at EDR: 04/16/2009
Date Made Active in Reports: 05/11/2009
Number of Days to Update: 25

Source: EPA
Telephone: 202-566-1667
Last EDR Contact: 08/18/2017
Next Scheduled EDR Contact: 12/04/2017
Data Release Frequency: No Update Planned

MLTS: Material Licensing Tracking System

MLTS is maintained by the Nuclear Regulatory Commission and contains a list of approximately 8,100 sites which possess or use radioactive materials and which are subject to NRC licensing requirements. To maintain currency, EDR contacts the Agency on a quarterly basis.

Date of Government Version: 10/26/2022
Date Data Arrived at EDR: 11/22/2022
Date Made Active in Reports: 12/05/2022
Number of Days to Update: 13

Source: Nuclear Regulatory Commission
Telephone: 301-415-7169
Last EDR Contact: 10/11/2022
Next Scheduled EDR Contact: 01/30/2023
Data Release Frequency: Quarterly

COAL ASH DOE: Steam-Electric Plant Operation Data

A listing of power plants that store ash in surface ponds.

Date of Government Version: 12/31/2020
Date Data Arrived at EDR: 11/30/2021
Date Made Active in Reports: 02/22/2022
Number of Days to Update: 84

Source: Department of Energy
Telephone: 202-586-8719
Last EDR Contact: 11/29/2022
Next Scheduled EDR Contact: 03/13/2023
Data Release Frequency: Varies

COAL ASH EPA: Coal Combustion Residues Surface Impoundments List

A listing of coal combustion residues surface impoundments with high hazard potential ratings.

Date of Government Version: 01/12/2017
Date Data Arrived at EDR: 03/05/2019
Date Made Active in Reports: 11/11/2019
Number of Days to Update: 251

Source: Environmental Protection Agency
Telephone: N/A
Last EDR Contact: 11/23/2022
Next Scheduled EDR Contact: 03/13/2023
Data Release Frequency: Varies

PCB TRANSFORMER: PCB Transformer Registration Database
The database of PCB transformer registrations that includes all PCB registration submittals.

Date of Government Version: 09/13/2019
Date Data Arrived at EDR: 11/06/2019
Date Made Active in Reports: 02/10/2020
Number of Days to Update: 96
Source: Environmental Protection Agency
Telephone: 202-566-0517
Last EDR Contact: 11/03/2022
Next Scheduled EDR Contact: 02/13/2023
Data Release Frequency: Varies

RADINFO: Radiation Information Database
The Radiation Information Database (RADINFO) contains information about facilities that are regulated by U.S. Environmental Protection Agency (EPA) regulations for radiation and radioactivity.

Date of Government Version: 07/01/2019
Date Data Arrived at EDR: 07/01/2019
Date Made Active in Reports: 09/23/2019
Number of Days to Update: 84
Source: Environmental Protection Agency
Telephone: 202-343-9775
Last EDR Contact: 12/20/2022
Next Scheduled EDR Contact: 04/10/2023
Data Release Frequency: Quarterly

HIST FTTS: FIFRA/TSCA Tracking System Administrative Case Listing
A complete administrative case listing from the FIFRA/TSCA Tracking System (FTTS) for all ten EPA regions. The information was obtained from the National Compliance Database (NCDB). NCDB supports the implementation of FIFRA (Federal Insecticide, Fungicide, and Rodenticide Act) and TSCA (Toxic Substances Control Act). Some EPA regions are now closing out records. Because of that, and the fact that some EPA regions are not providing EPA Headquarters with updated records, it was decided to create a HIST FTTS database. It included records that may not be included in the newer FTTS database updates. This database is no longer updated.

Date of Government Version: 10/19/2006
Date Data Arrived at EDR: 03/01/2007
Date Made Active in Reports: 04/10/2007
Number of Days to Update: 40
Source: Environmental Protection Agency
Telephone: 202-564-2501
Last EDR Contact: 12/17/2007
Next Scheduled EDR Contact: 03/17/2008
Data Release Frequency: No Update Planned

HIST FTTS INSP: FIFRA/TSCA Tracking System Inspection & Enforcement Case Listing
A complete inspection and enforcement case listing from the FIFRA/TSCA Tracking System (FTTS) for all ten EPA regions. The information was obtained from the National Compliance Database (NCDB). NCDB supports the implementation of FIFRA (Federal Insecticide, Fungicide, and Rodenticide Act) and TSCA (Toxic Substances Control Act). Some EPA regions are now closing out records. Because of that, and the fact that some EPA regions are not providing EPA Headquarters with updated records, it was decided to create a HIST FTTS database. It included records that may not be included in the newer FTTS database updates. This database is no longer updated.

Date of Government Version: 10/19/2006
Date Data Arrived at EDR: 03/01/2007
Date Made Active in Reports: 04/10/2007
Number of Days to Update: 40
Source: Environmental Protection Agency
Telephone: 202-564-2501
Last EDR Contact: 12/17/2008
Next Scheduled EDR Contact: 03/17/2008
Data Release Frequency: No Update Planned

DOT OPS: Incident and Accident Data
Department of Transporation, Office of Pipeline Safety Incident and Accident data.

Date of Government Version: 01/02/2020
Date Data Arrived at EDR: 01/28/2020
Date Made Active in Reports: 04/17/2020
Number of Days to Update: 80
Source: Department of Transporation, Office of Pipeline Safety
Telephone: 202-366-4595
Last EDR Contact: 10/24/2022
Next Scheduled EDR Contact: 02/06/2023
Data Release Frequency: Quarterly

CONSENT: Superfund (CERCLA) Consent Decrees
Major legal settlements that establish responsibility and standards for cleanup at NPL (Superfund) sites. Released periodically by United States District Courts after settlement by parties to litigation matters.

Date of Government Version: 06/30/2022
Date Data Arrived at EDR: 07/21/2022
Date Made Active in Reports: 09/30/2022
Number of Days to Update: 71

Source: Department of Justice, Consent Decree Library
Telephone: Varies
Last EDR Contact: 09/27/2022
Next Scheduled EDR Contact: 01/16/2023
Data Release Frequency: Varies

BRS: Biennial Reporting System

The Biennial Reporting System is a national system administered by the EPA that collects data on the generation and management of hazardous waste. BRS captures detailed data from two groups: Large Quantity Generators (LQG) and Treatment, Storage, and Disposal Facilities.

Date of Government Version: 12/31/2019
Date Data Arrived at EDR: 03/02/2022
Date Made Active in Reports: 03/25/2022
Number of Days to Update: 23

Source: EPA/NTIS
Telephone: 800-424-9346
Last EDR Contact: 12/21/2022
Next Scheduled EDR Contact: 04/03/2023
Data Release Frequency: Biennially

INDIAN RESERV: Indian Reservations

This map layer portrays Indian administered lands of the United States that have any area equal to or greater than 640 acres.

Date of Government Version: 12/31/2014
Date Data Arrived at EDR: 07/14/2015
Date Made Active in Reports: 01/10/2017
Number of Days to Update: 546

Source: USGS
Telephone: 202-208-3710
Last EDR Contact: 10/06/2022
Next Scheduled EDR Contact: 01/16/2023
Data Release Frequency: Semi-Annually

FUSRAP: Formerly Utilized Sites Remedial Action Program

DOE established the Formerly Utilized Sites Remedial Action Program (FUSRAP) in 1974 to remediate sites where radioactive contamination remained from Manhattan Project and early U.S. Atomic Energy Commission (AEC) operations.

Date of Government Version: 07/26/2021
Date Data Arrived at EDR: 07/27/2021
Date Made Active in Reports: 10/22/2021
Number of Days to Update: 87

Source: Department of Energy
Telephone: 202-586-3559
Last EDR Contact: 10/27/2022
Next Scheduled EDR Contact: 02/16/2023
Data Release Frequency: Varies

UMTRA: Uranium Mill Tailings Sites

Uranium ore was mined by private companies for federal government use in national defense programs. When the mills shut down, large piles of the sand-like material (mill tailings) remain after uranium has been extracted from the ore. Levels of human exposure to radioactive materials from the piles are low; however, in some cases tailings were used as construction materials before the potential health hazards of the tailings were recognized.

Date of Government Version: 08/30/2019
Date Data Arrived at EDR: 11/15/2019
Date Made Active in Reports: 01/28/2020
Number of Days to Update: 74

Source: Department of Energy
Telephone: 505-845-0011
Last EDR Contact: 11/09/2022
Next Scheduled EDR Contact: 02/27/2023
Data Release Frequency: Varies

LEAD SMELTER 1: Lead Smelter Sites

A listing of former lead smelter site locations.

Date of Government Version: 10/27/2022
Date Data Arrived at EDR: 11/01/2022
Date Made Active in Reports: 11/15/2022
Number of Days to Update: 14

Source: Environmental Protection Agency
Telephone: 703-603-8787
Last EDR Contact: 12/01/2022
Next Scheduled EDR Contact: 04/10/2023
Data Release Frequency: Varies

LEAD SMELTER 2: Lead Smelter Sites

A list of several hundred sites in the U.S. where secondary lead smelting was done from 1931and 1964. These sites may pose a threat to public health through ingestion or inhalation of contaminated soil or dust

Date of Government Version: 04/05/2001
Date Data Arrived at EDR: 10/27/2010
Date Made Active in Reports: 12/02/2010
Number of Days to Update: 36

Source: American Journal of Public Health
Telephone: 703-305-6451
Last EDR Contact: 12/02/2009
Next Scheduled EDR Contact: N/A
Data Release Frequency: No Update Planned

US AIRS (AFS): Aerometric Information Retrieval System Facility Subsystem (AFS)

The database is a sub-system of Aerometric Information Retrieval System (AIRS). AFS contains compliance data on air pollution point sources regulated by the U.S. EPA and/or state and local air regulatory agencies. This information comes from source reports by various stationary sources of air pollution, such as electric power plants, steel mills, factories, and universities, and provides information about the air pollutants they produce. Action, air program, air program pollutant, and general level plant data. It is used to track emissions and compliance data from industrial plants.

Date of Government Version: 10/12/2016
Date Data Arrived at EDR: 10/26/2016
Date Made Active in Reports: 02/03/2017
Number of Days to Update: 100

Source: EPA
Telephone: 202-564-2496
Last EDR Contact: 09/26/2017
Next Scheduled EDR Contact: 01/08/2018
Data Release Frequency: Annually

US AIRS MINOR: Air Facility System Data

A listing of minor source facilities.

Date of Government Version: 10/12/2016
Date Data Arrived at EDR: 10/26/2016
Date Made Active in Reports: 02/03/2017
Number of Days to Update: 100

Source: EPA
Telephone: 202-564-2496
Last EDR Contact: 09/26/2017
Next Scheduled EDR Contact: 01/08/2018
Data Release Frequency: Annually

US MINES: Mines Master Index File

Contains all mine identification numbers issued for mines active or opened since 1971. The data also includes violation information.

Date of Government Version: 08/03/2022
Date Data Arrived at EDR: 08/17/2022
Date Made Active in Reports: 08/31/2022
Number of Days to Update: 14

Source: Department of Labor, Mine Safety and Health Administration
Telephone: 303-231-5959
Last EDR Contact: 11/17/2022
Next Scheduled EDR Contact: 03/06/2023
Data Release Frequency: Semi-Annually

MINES VIOLATIONS: MSHA Violation Assessment Data

Mines violation and assessment information. Department of Labor, Mine Safety & Health Administration.

Date of Government Version: 11/29/2022
Date Data Arrived at EDR: 11/30/2022
Date Made Active in Reports: 12/22/2022
Number of Days to Update: 22

Source: DOL, Mine Safety & Health Admi
Telephone: 202-693-9424
Last EDR Contact: 11/28/2022
Next Scheduled EDR Contact: 03/13/2023
Data Release Frequency: Quarterly

US MINES 2: Ferrous and Nonferrous Metal Mines Database Listing

This map layer includes ferrous (ferrous metal mines are facilities that extract ferrous metals, such as iron ore or molybdenum) and nonferrous (Nonferrous metal mines are facilities that extract nonferrous metals, such as gold, silver, copper, zinc, and lead) metal mines in the United States.

Date of Government Version: 05/06/2020
Date Data Arrived at EDR: 05/27/2020
Date Made Active in Reports: 08/13/2020
Number of Days to Update: 78

Source: USGS
Telephone: 703-648-7709
Last EDR Contact: 11/21/2022
Next Scheduled EDR Contact: 03/06/2023
Data Release Frequency: Varies

US MINES 3: Active Mines & Mineral Plants Database Listing

Active Mines and Mineral Processing Plant operations for commodities monitored by the Minerals Information Team of the USGS.

Date of Government Version: 04/14/2011
Date Data Arrived at EDR: 06/08/2011
Date Made Active in Reports: 09/13/2011
Number of Days to Update: 97

Source: USGS
Telephone: 703-648-7709
Last EDR Contact: 11/21/2022
Next Scheduled EDR Contact: 03/06/2023
Data Release Frequency: Varies

ABANDONED MINES: Abandoned Mines

An inventory of land and water impacted by past mining (primarily coal mining) is maintained by OSMRE to provide information needed to implement the Surface Mining Control and Reclamation Act of 1977 (SMCRA). The inventory contains information on the location, type, and extent of AML impacts, as well as, information on the cost associated with the reclamation of those problems. The inventory is based upon field surveys by State, Tribal, and OSMRE program officials. It is dynamic to the extent that it is modified as new problems are identified and existing problems are reclaimed.

Date of Government Version: 09/13/2022
Date Data Arrived at EDR: 09/14/2022
Date Made Active in Reports: 12/05/2022
Number of Days to Update: 82

Source: Department of Interior
Telephone: 202-208-2609
Last EDR Contact: 12/13/2022
Next Scheduled EDR Contact: 03/20/2023
Data Release Frequency: Quarterly

FINDS: Facility Index System/Facility Registry System

Facility Index System. FINDS contains both facility information and 'pointers' to other sources that contain more detail. EDR includes the following FINDS databases in this report: PCS (Permit Compliance System), AIRS (Aerometric Information Retrieval System), DOCKET (Enforcement Docket used to manage and track information on civil judicial enforcement cases for all environmental statutes), FURS (Federal Underground Injection Control), C-DOCKET (Criminal Docket System used to track criminal enforcement actions for all environmental statutes), FFIS (Federal Facilities Information System), STATE (State Environmental Laws and Statutes), and PADS (PCB Activity Data System).

Date of Government Version: 08/03/2022
Date Data Arrived at EDR: 08/25/2022
Date Made Active in Reports: 10/24/2022
Number of Days to Update: 60

Source: EPA
Telephone: (415) 947-8000
Last EDR Contact: 11/29/2022
Next Scheduled EDR Contact: 03/13/2023
Data Release Frequency: Quarterly

UXO: Unexploded Ordnance Sites

A listing of unexploded ordnance site locations

Date of Government Version: 12/31/2020
Date Data Arrived at EDR: 01/11/2022
Date Made Active in Reports: 02/14/2022
Number of Days to Update: 34

Source: Department of Defense
Telephone: 703-704-1564
Last EDR Contact: 10/05/2022
Next Scheduled EDR Contact: 01/23/2023
Data Release Frequency: Varies

DOCKET HWC: Hazardous Waste Compliance Docket Listing

A complete list of the Federal Agency Hazardous Waste Compliance Docket Facilities.

Date of Government Version: 05/06/2021
Date Data Arrived at EDR: 05/21/2021
Date Made Active in Reports: 08/11/2021
Number of Days to Update: 82

Source: Environmental Protection Agency
Telephone: 202-564-0527
Last EDR Contact: 11/15/2022
Next Scheduled EDR Contact: 03/06/2023
Data Release Frequency: Varies

ECHO: Enforcement & Compliance History Information

ECHO provides integrated compliance and enforcement information for about 800,000 regulated facilities nationwide.

Date of Government Version: 09/25/2022
Date Data Arrived at EDR: 09/30/2022
Date Made Active in Reports: 12/22/2022
Number of Days to Update: 83
Source: Environmental Protection Agency
Telephone: 202-564-2280
Last EDR Contact: 09/30/2022
Next Scheduled EDR Contact: 01/16/2023
Data Release Frequency: Quarterly

FUELS PROGRAM: EPA Fuels Program Registered Listing

This listing includes facilities that are registered under the Part 80 (Code of Federal Regulations) EPA Fuels Programs. All companies now are required to submit new and updated registrations.

Date of Government Version: 08/11/2022
Date Data Arrived at EDR: 08/11/2022
Date Made Active in Reports: 09/30/2022
Number of Days to Update: 50
Source: EPA
Telephone: 800-385-6164
Last EDR Contact: 11/10/2022
Next Scheduled EDR Contact: 02/27/2023
Data Release Frequency: Quarterly

PFAS NPL: Superfund Sites with PFAS Detections Information

EPA's Office of Land and Emergency Management and EPA Regional Offices maintain data describing what is known about site investigations, contamination, and remedial actions under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) where PFAS is present in the environment.

Date of Government Version: 02/23/2022
Date Data Arrived at EDR: 07/08/2022
Date Made Active in Reports: 11/08/2022
Number of Days to Update: 123
Source: Environmental Protection Agency
Telephone: 703-603-8895
Last EDR Contact: 10/04/2022
Next Scheduled EDR Contact: 01/16/2023
Data Release Frequency: Varies

PFAS FEDERAL SITES: Federal Sites PFAS Information

Several federal entities, such as the federal Superfund program, Department of Defense, National Aeronautics and Space Administration, Department of Transportation, and Department of Energy provided information for sites with known or suspected detections at federal facilities.

Date of Government Version: 02/23/2022
Date Data Arrived at EDR: 03/31/2022
Date Made Active in Reports: 11/08/2022
Number of Days to Update: 222
Source: Environmental Protection Agency
Telephone: 202-272-0167
Last EDR Contact: 10/06/2022
Next Scheduled EDR Contact: 01/16/2023
Data Release Frequency: Varies

PFAS TSCA: PFAS Manufacture and Imports Information

EPA issued the Chemical Data Reporting (CDR) Rule under the Toxic Substances Control Act (TSCA) and requires chemical manufacturers and facilities that manufacture or import chemical substances to report data to EPA. EPA publishes non-confidential business information (non-CBI) and includes descriptive information about each site, corporate parent, production volume, other manufacturing information, and processing and use information.

Date of Government Version: 01/03/2022
Date Data Arrived at EDR: 03/31/2022
Date Made Active in Reports: 11/08/2022
Number of Days to Update: 222
Source: Environmental Protection Agency
Telephone: 202-272-0167
Last EDR Contact: 10/04/2022
Next Scheduled EDR Contact: 01/16/2023
Data Release Frequency: Varies

PFAS RCRA MANIFEST: PFAS Transfers Identified In the RCRA Database Listing

To work around the lack of PFAS waste codes in the RCRA database, EPA developed the PFAS Transfers dataset by mining e-Manifest records containing at least one of these common PFAS keywords: PFAS, PFOA, PFOS, PERFL, AFFF, GENX, GEN-X (plus the VT waste codes). These keywords were searched for in the following text fields: Manifest handling instructions (MANIFEST_HANDLING_INSTR), Non-hazardous waste description (NON_HAZ_WASTE_DESCRIPTION), DOT printed information (DOT_PRINTED_INFORMATION), Waste line handling instructions (WASTE_LINE_HANDLING_INSTR), Waste residue comments (WASTE_RESIDUE_COMMENTS).

Date of Government Version: 01/03/2022
Date Data Arrived at EDR: 03/31/2022
Date Made Active in Reports: 11/08/2022
Number of Days to Update: 222
Source: Environmental Protection Agency
Telephone: 202-272-0167
Last EDR Contact: 10/06/2022
Next Scheduled EDR Contact: 01/16/2023
Data Release Frequency: Varies

PFAS ATSDR: PFAS Contamination Site Location Listing

PFAS contamination site locations from the Department of Health & Human Services, Center for Disease Control & Prevention. ATSDR is involved at a number of PFAS-related sites, either directly or through assisting state and federal partners. As of now, most sites are related to drinking water contamination connected with PFAS production facilities or fire training areas where aqueous film-forming firefighting foam (AFFF) was regularly used.

Date of Government Version: 06/24/2020
Date Data Arrived at EDR: 03/17/2021
Date Made Active in Reports: 11/08/2022
Number of Days to Update: 601

Source: Department of Health & Human Services
Telephone: 202-741-5770
Last EDR Contact: 10/28/2022
Next Scheduled EDR Contact: 02/06/2023
Data Release Frequency: Varies

PFAS WQP: Ambient Environmental Sampling for PFAS

The Water Quality Portal (WQP) is a part of a modernized repository storing ambient sampling data for all environmental media and tissue samples. A wide range of federal, state, tribal and local governments, academic and non-governmental organizations and individuals submit project details and sampling results to this public repository. The information is commonly used for research and assessments of environmental quality.

Date of Government Version: 01/03/2022
Date Data Arrived at EDR: 03/31/2022
Date Made Active in Reports: 11/08/2022
Number of Days to Update: 222

Source: Environmental Protection Agency
Telephone: 202-272-0167
Last EDR Contact: 10/06/2022
Next Scheduled EDR Contact: 01/16/2023
Data Release Frequency: Varies

PFAS NPDES: Clean Water Act Discharge Monitoring Information

Any discharger of pollutants to waters of the United States from a point source must have a National Pollutant Discharge Elimination System (NPDES) permit. The process for obtaining limits involves the regulated entity (permittee) disclosing releases in a NPDES permit application and the permitting authority (typically the state but sometimes EPA) deciding whether to require monitoring or monitoring with limits.

Date of Government Version: 01/03/2022
Date Data Arrived at EDR: 03/31/2022
Date Made Active in Reports: 11/08/2022
Number of Days to Update: 222

Source: Environmental Protection Agency
Telephone: 202-272-0167
Last EDR Contact: 10/06/2022
Next Scheduled EDR Contact: 01/16/2023
Data Release Frequency: Varies

PFAS ECHO: Facilities in Industries that May Be Handling PFAS Listing

Regulators and the public have expressed interest in knowing which regulated entities may be using PFAS. EPA has developed a dataset from various sources that show which industries may be handling PFAS. Approximately 120,000 facilities subject to federal environmental programs have operated or currently operate in industry sectors with processes that may involve handling and/or release of PFAS.

Date of Government Version: 01/03/2022
Date Data Arrived at EDR: 03/31/2022
Date Made Active in Reports: 11/08/2022
Number of Days to Update: 222

Source: Environmental Protection Agency
Telephone: 202-272-0167
Last EDR Contact: 10/06/2022
Next Scheduled EDR Contact: 01/16/2023
Data Release Frequency: Varies

PFAS ECHO FIRE TRAINING: Facilities in Industries that May Be Handling PFAS Listing

A list of fire training sites was added to the Industry Sectors dataset using a keyword search on the permitted facilitys name to identify sites where fire-fighting foam may have been used in training exercises. Additionally, you may view an example spreadsheet of the subset of fire training facility data, as well as the keywords used in selecting or deselecting a facility for the subset. as well as the keywords used in selecting or deselecting a facility for the subset. These keywords were tested to maximize accuracy in selecting facilities that may use fire-fighting foam in training exercises, however, due to the lack of a required reporting field in the data systems for designating fire training sites, this methodology may not identify all fire training sites or may potentially misidentify them.

Date of Government Version: 08/22/2018
Date Data Arrived at EDR: 03/31/2022
Date Made Active in Reports: 11/08/2022
Number of Days to Update: 222

Source: Environmental Protection Agency
Telephone: 202-272-0167
Last EDR Contact: 10/06/2022
Next Scheduled EDR Contact: 01/16/2023
Data Release Frequency: Varies

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

PFAS PART 139 AIRPORT: All Certified Part 139 Airports PFAS Information Listing

Since July 1, 2006, all certified part 139 airports are required to have fire-fighting foam onsite that meet military specifications (MIL-F-24385) (14 CFR 139.317). To date, these military specification fire-fighting foams are fluorinated and have been historically used for training and extinguishing. The 2018 FAA Reauthorization Act has a provision stating that no later than October 2021, FAA shall not require the use of fluorinated AFFF. This provision does not prohibit the use of fluorinated AFFF at Part 139 civilian airports; it only prohibits FAA from mandating its use. The Federal Aviation Administration?s document AC 150/5210-6D - Aircraft Fire Extinguishing Agents provides guidance on Aircraft Fire Extinguishing Agents, which includes Aqueous Film Forming Foam (AFFF).

Date of Government Version: 08/22/2018
Date Data Arrived at EDR: 10/26/2022
Date Made Active in Reports: 11/08/2022
Number of Days to Update: 13

Source: Environmental Protection Agency
Telephone: 202-272-0167
Last EDR Contact: 10/26/2022
Next Scheduled EDR Contact: 01/16/2023
Data Release Frequency: Varies

AQUEOUS FOAM NRC: Aqueous Foam Related Incidents Listing

The National Response Center (NRC) serves as an emergency call center that fields initial reports for pollution and railroad incidents and forwards that information to appropriate federal/state agencies for response. The spreadsheets posted to the NRC website contain initial incident data that has not been validated or investigated by a federal/state response agency. Response center calls from 1990 to the most recent complete calendar year where there was indication of Aqueous Film Forming Foam (AFFF) usage are included in this dataset. NRC calls may reference AFFF usage in the ?Material Involved? or ?Incident Description? fields.

Date of Government Version: 02/23/2022
Date Data Arrived at EDR: 03/31/2022
Date Made Active in Reports: 11/08/2022
Number of Days to Update: 222

Source: Environmental Protection Agency
Telephone: 202-272-0167
Last EDR Contact: 10/06/2022
Next Scheduled EDR Contact: 01/16/2023
Data Release Frequency: Varies

PFAS: PFAS Contamination Site Location Listing

A listing of PFAS contaminated sites included in the GeoTracker database.

Date of Government Version: 08/31/2022
Date Data Arrived at EDR: 08/31/2022
Date Made Active in Reports: 10/31/2022
Number of Days to Update: 61

Source: State Water Resources Control Board
Telephone: 866-480-1028
Last EDR Contact: 12/02/2022
Next Scheduled EDR Contact: 03/20/2023
Data Release Frequency: Varies

AQUEOUS FOAM: Former Fire Training Facility Assessments Listing

Airports shown on this list are those believed to use Aqueous Film Forming Foam (AFFF), and certified by the Federal Aviation Administration (FAA) under Title 14, Code of Federal Regulations (CFR), Part 139 (14 CFR Part 139). This list was created by SWRCB using information available from the FAA. Location points shown are from the latitude and longitude listed on the FAA airport master record.

Date of Government Version: 09/06/2022
Date Data Arrived at EDR: 09/06/2022
Date Made Active in Reports: 10/26/2022
Number of Days to Update: 50

Source: State Water Resources Control Board
Telephone: 916-341-5455
Last EDR Contact: 10/09/2022
Next Scheduled EDR Contact: 03/20/2023
Data Release Frequency: Varies

CA BOND EXP. PLAN: Bond Expenditure Plan

Department of Health Services developed a site-specific expenditure plan as the basis for an appropriation of Hazardous Substance Cleanup Bond Act funds. It is not updated.

Date of Government Version: 01/01/1989
Date Data Arrived at EDR: 07/27/1994
Date Made Active in Reports: 08/02/1994
Number of Days to Update: 6

Source: Department of Health Services
Telephone: 916-255-2118
Last EDR Contact: 05/31/1994
Next Scheduled EDR Contact: N/A
Data Release Frequency: No Update Planned

CORTESE: "Cortese" Hazardous Waste & Substances Sites List
The sites for the list are designated by the State Water Resource Control Board (LUST), the Integrated Waste Board (SWF/LS), and the Department of Toxic Substances Control (Cal-Sites).

Date of Government Version: 09/19/2022
Date Data Arrived at EDR: 09/19/2022
Date Made Active in Reports: 12/07/2022
Number of Days to Update: 79
Source: CAL EPA/Office of Emergency Information
Telephone: 916-323-3400
Last EDR Contact: 12/14/2022
Next Scheduled EDR Contact: 04/03/2023
Data Release Frequency: Quarterly

CUPA LIVERMORE-PLEASANTON: CUPA Facility Listing
list of facilities associated with the various CUPA programs in Livermore-Pleasanton

Date of Government Version: 12/07/2021
Date Data Arrived at EDR: 05/09/2022
Date Made Active in Reports: 05/17/2022
Number of Days to Update: 8
Source: Livermore-Pleasanton Fire Department
Telephone: 925-454-2361
Last EDR Contact: 11/10/2022
Next Scheduled EDR Contact: 02/20/2023
Data Release Frequency: Varies

DRYCLEAN AVAQMD: Antelope Valley Air Quality Management District Drycleaner Listing
A listing of dry cleaners in the Antelope Valley Air Quality Management District.

Date of Government Version: 05/25/2022
Date Data Arrived at EDR: 05/26/2022
Date Made Active in Reports: 08/11/2022
Number of Days to Update: 77
Source: Antelope Valley Air Quality Management District
Telephone: 661-723-8070
Last EDR Contact: 11/14/2022
Next Scheduled EDR Contact: 03/13/2023
Data Release Frequency: Varies

DRYCLEANERS: Cleaner Facilities
A list of drycleaner related facilities that have EPA ID numbers. These are facilities with certain SIC codes: power laundries, family and commercial; garment pressing and cleaner's agents; linen supply; coin-operated laundries and cleaning; drycleaning plants, except rugs; carpet and upholster cleaning; industrial launderers; laundry and garment services.

Date of Government Version: 08/27/2021
Date Data Arrived at EDR: 09/01/2021
Date Made Active in Reports: 11/19/2021
Number of Days to Update: 79
Source: Department of Toxic Substance Control
Telephone: 916-327-4498
Last EDR Contact: 11/07/2022
Next Scheduled EDR Contact: 03/13/2023
Data Release Frequency: Annually

DRYCLEAN SOUTH COAST: South Coast Air Quality Management District Drycleaner Listing
A listing of dry cleaners in the South Coast Air Quality Management District

Date of Government Version: 08/18/2022
Date Data Arrived at EDR: 08/29/2022
Date Made Active in Reports: 11/14/2022
Number of Days to Update: 77
Source: South Coast Air Quality Management District
Telephone: 909-396-3211
Last EDR Contact: 11/15/2022
Next Scheduled EDR Contact: 03/06/2023
Data Release Frequency: Varies

EMI: Emissions Inventory Data
Toxics and criteria pollutant emissions data collected by the ARB and local air pollution agencies.

Date of Government Version: 12/31/2020
Date Data Arrived at EDR: 06/13/2022
Date Made Active in Reports: 08/30/2022
Number of Days to Update: 78
Source: California Air Resources Board
Telephone: 916-322-2990
Last EDR Contact: 12/15/2022
Next Scheduled EDR Contact: 03/27/2023
Data Release Frequency: Varies

ENF: Enforcement Action Listing
A listing of Water Board Enforcement Actions. Formal is everything except Oral/Verbal Communication, Notice of Violation, Expedited Payment Letter, and Staff Enforcement Letter.

Date of Government Version: 07/12/2022
Date Data Arrived at EDR: 07/18/2022
Date Made Active in Reports: 09/29/2022
Number of Days to Update: 73

Source: State Water Resoruces Control Board
Telephone: 916-445-9379
Last EDR Contact: 10/19/2022
Next Scheduled EDR Contact: 01/30/2023
Data Release Frequency: Varies

Financial Assurance 1: Financial Assurance Information Listing

Financial Assurance information

Date of Government Version: 10/12/2022
Date Data Arrived at EDR: 10/12/2022
Date Made Active in Reports: 12/29/2022
Number of Days to Update: 78

Source: Department of Toxic Substances Control
Telephone: 916-255-3628
Last EDR Contact: 10/11/2022
Next Scheduled EDR Contact: 01/30/2023
Data Release Frequency: Varies

Financial Assurance 2: Financial Assurance Information Listing

A listing of financial assurance information for solid waste facilities. Financial assurance is intended to ensure that resources are available to pay for the cost of closure, post-closure care, and corrective measures if the owner or operator of a regulated facility is unable or unwilling to pay.

Date of Government Version: 08/09/2022
Date Data Arrived at EDR: 08/10/2022
Date Made Active in Reports: 08/30/2022
Number of Days to Update: 20

Source: California Integrated Waste Management Board
Telephone: 916-341-6066
Last EDR Contact: 11/15/2022
Next Scheduled EDR Contact: 02/20/2023
Data Release Frequency: Varies

ICE: ICE

Contains data pertaining to the Permitted Facilities with Inspections / Enforcements sites tracked in Envirostor.

Date of Government Version: 08/11/2022
Date Data Arrived at EDR: 08/11/2022
Date Made Active in Reports: 10/28/2022
Number of Days to Update: 78

Source: Department of Toxic Subsances Control
Telephone: 877-786-9427
Last EDR Contact: 11/10/2022
Next Scheduled EDR Contact: 02/27/2023
Data Release Frequency: Quarterly

HIST CORTESE: Hazardous Waste & Substance Site List

The sites for the list are designated by the State Water Resource Control Board [LUST], the Integrated Waste Board [SWF/LS], and the Department of Toxic Substances Control [CALSITES]. This listing is no longer updated by the state agency.

Date of Government Version: 04/01/2001
Date Data Arrived at EDR: 01/22/2009
Date Made Active in Reports: 04/08/2009
Number of Days to Update: 76

Source: Department of Toxic Substances Control
Telephone: 916-323-3400
Last EDR Contact: 01/22/2009
Next Scheduled EDR Contact: N/A
Data Release Frequency: No Update Planned

HWP: EnviroStor Permitted Facilities Listing

Detailed information on permitted hazardous waste facilities and corrective action ("cleanups") tracked in EnviroStor.

Date of Government Version: 08/11/2022
Date Data Arrived at EDR: 08/11/2022
Date Made Active in Reports: 10/28/2022
Number of Days to Update: 78

Source: Department of Toxic Substances Control
Telephone: 916-323-3400
Last EDR Contact: 11/10/2022
Next Scheduled EDR Contact: 02/27/2023
Data Release Frequency: Quarterly

HWT: Registered Hazardous Waste Transporter Database

A listing of hazardous waste transporters. In California, unless specifically exempted, it is unlawful for any person to transport hazardous wastes unless the person holds a valid registration issued by DTSC. A hazardous waste transporter registration is valid for one year and is assigned a unique registration number.

Date of Government Version: 10/03/2022
Date Data Arrived at EDR: 10/03/2022
Date Made Active in Reports: 12/15/2022
Number of Days to Update: 73

Source: Department of Toxic Substances Control
Telephone: 916-440-7145
Last EDR Contact: 10/03/2022
Next Scheduled EDR Contact: 01/16/2023
Data Release Frequency: Quarterly

HAZNET: Facility and Manifest Data

Facility and Manifest Data. The data is extracted from the copies of hazardous waste manifests received each year by the DTSC. The annual volume of manifests is typically 700,000 - 1,000,000 annually, representing approximately 350,000 - 500,000 shipments. Data are from the manifests submitted without correction, and therefore many contain some invalid values for data elements such as generator ID, TSD ID, waste category, and disposal method. This database begins with calendar year 1993.

Date of Government Version: 12/31/2021
Date Data Arrived at EDR: 07/05/2022
Date Made Active in Reports: 09/19/2022
Number of Days to Update: 76

Source: California Environmental Protection Agency
Telephone: 916-255-1136
Last EDR Contact: 09/27/2022
Next Scheduled EDR Contact: 01/16/2023
Data Release Frequency: Annually

MINES: Mines Site Location Listing

A listing of mine site locations from the Office of Mine Reclamation.

Date of Government Version: 08/31/2022
Date Data Arrived at EDR: 08/31/2022
Date Made Active in Reports: 11/18/2022
Number of Days to Update: 79

Source: Department of Conservation
Telephone: 916-322-1080
Last EDR Contact: 12/02/2022
Next Scheduled EDR Contact: 03/20/2023
Data Release Frequency: Quarterly

MWMP: Medical Waste Management Program Listing

The Medical Waste Management Program (MWMP) ensures the proper handling and disposal of medical waste by permitting and inspecting medical waste Offsite Treatment Facilities (PDF) and Transfer Stations (PDF) throughout the state. MWMP also oversees all Medical Waste Transporters.

Date of Government Version: 08/08/2022
Date Data Arrived at EDR: 08/25/2022
Date Made Active in Reports: 11/14/2022
Number of Days to Update: 81

Source: Department of Public Health
Telephone: 916-558-1784
Last EDR Contact: 11/29/2022
Next Scheduled EDR Contact: 03/13/2023
Data Release Frequency: Varies

NPDES: NPDES Permits Listing

A listing of NPDES permits, including stormwater.

Date of Government Version: 08/08/2022
Date Data Arrived at EDR: 08/08/2022
Date Made Active in Reports: 10/20/2022
Number of Days to Update: 73

Source: State Water Resources Control Board
Telephone: 916-445-9379
Last EDR Contact: 11/03/2022
Next Scheduled EDR Contact: 02/20/2023
Data Release Frequency: Quarterly

PEST LIC: Pesticide Regulation Licenses Listing

A listing of licenses and certificates issued by the Department of Pesticide Regulation. The DPR issues licenses and/or certificates to: Persons and businesses that apply or sell pesticides; Pest control dealers and brokers; Persons who advise on agricultural pesticide applications.

Date of Government Version: 08/25/2022
Date Data Arrived at EDR: 08/25/2022
Date Made Active in Reports: 11/14/2022
Number of Days to Update: 81

Source: Department of Pesticide Regulation
Telephone: 916-445-4038
Last EDR Contact: 11/29/2022
Next Scheduled EDR Contact: 03/13/2023
Data Release Frequency: Quarterly

PROC: Certified Processors Database
A listing of certified processors.

Date of Government Version: 08/31/2022
Date Data Arrived at EDR: 08/31/2022
Date Made Active in Reports: 11/18/2022
Number of Days to Update: 79
Source: Department of Conservation
Telephone: 916-323-3836
Last EDR Contact: 12/02/2022
Next Scheduled EDR Contact: 03/20/2023
Data Release Frequency: Quarterly

NOTIFY 65: Proposition 65 Records
Listings of all Proposition 65 incidents reported to counties by the State Water Resources Control Board and the Regional Water Quality Control Board. This database is no longer updated by the reporting agency.

Date of Government Version: 09/07/2022
Date Data Arrived at EDR: 09/08/2022
Date Made Active in Reports: 11/29/2022
Number of Days to Update: 82
Source: State Water Resources Control Board
Telephone: 916-445-3846
Last EDR Contact: 12/06/2022
Next Scheduled EDR Contact: 03/27/2023
Data Release Frequency: No Update Planned

UIC: UIC Listing
A listing of wells identified as underground injection wells, in the California Oil and Gas Wells database.

Date of Government Version: 08/31/2022
Date Data Arrived at EDR: 08/31/2022
Date Made Active in Reports: 11/18/2022
Number of Days to Update: 79
Source: Deaprtment of Conservation
Telephone: 916-445-2408
Last EDR Contact: 12/02/2022
Next Scheduled EDR Contact: 03/20/2023
Data Release Frequency: Varies

UIC GEO: Underground Injection Control Sites (GEOTRACKER)
Underground control injection sites

Date of Government Version: 08/31/2022
Date Data Arrived at EDR: 08/31/2022
Date Made Active in Reports: 11/17/2022
Number of Days to Update: 78
Source: State Water Resource Control Board
Telephone: 866-480-1028
Last EDR Contact: 12/02/2022
Next Scheduled EDR Contact: 03/20/2023
Data Release Frequency: Varies

WASTEWATER PITS: Oil Wastewater Pits Listing
Water officials discovered that oil producers have been dumping chemical-laden wastewater into hundreds of unlined pits that are operating without proper permits. Inspections completed by the Central Valley Regional Water Quality Control Board revealed the existence of previously unidentified waste sites. The water boards review found that more than one-third of the region's active disposal pits are operating without permission.

Date of Government Version: 02/11/2021
Date Data Arrived at EDR: 07/01/2021
Date Made Active in Reports: 09/29/2021
Number of Days to Update: 90
Source: RWQCB, Central Valley Region
Telephone: 559-445-5577
Last EDR Contact: 10/06/2022
Next Scheduled EDR Contact: 01/16/2023
Data Release Frequency: Varies

WDS: Waste Discharge System
Sites which have been issued waste discharge requirements.

Date of Government Version: 06/19/2007
Date Data Arrived at EDR: 06/20/2007
Date Made Active in Reports: 06/29/2007
Number of Days to Update: 9
Source: State Water Resources Control Board
Telephone: 916-341-5227
Last EDR Contact: 11/08/2022
Next Scheduled EDR Contact: 02/27/2023
Data Release Frequency: No Update Planned

WIP: Well Investigation Program Case List
Well Investigation Program case in the San Gabriel and San Fernando Valley area.

Date of Government Version: 07/03/2009
Date Data Arrived at EDR: 07/21/2009
Date Made Active in Reports: 08/03/2009
Number of Days to Update: 13

Source: Los Angeles Water Quality Control Board
Telephone: 213-576-6726
Last EDR Contact: 12/13/2022
Next Scheduled EDR Contact: 04/03/2023
Data Release Frequency: No Update Planned

MILITARY PRIV SITES: Military Privatized Sites (GEOTRACKER)
Military privatized sites

Date of Government Version: 08/31/2022
Date Data Arrived at EDR: 08/31/2022
Date Made Active in Reports: 11/17/2022
Number of Days to Update: 78

Source: State Water Resources Control Board
Telephone: 866-480-1028
Last EDR Contact: 12/02/2022
Next Scheduled EDR Contact: 03/20/2023
Data Release Frequency: Varies

PROJECT: Project Sites (GEOTRACKER)
Projects sites

Date of Government Version: 08/31/2022
Date Data Arrived at EDR: 08/31/2022
Date Made Active in Reports: 11/17/2022
Number of Days to Update: 78

Source: State Water Resources Control Board
Telephone: 866-480-1028
Last EDR Contact: 12/02/2022
Next Scheduled EDR Contact: 03/20/2023
Data Release Frequency: Varies

WDR: Waste Discharge Requirements Listing
In general, the Waste Discharge Requirements (WDRs) Program (sometimes also referred to as the "Non Chapter 15 (Non 15) Program") regulates point discharges that are exempt pursuant to Subsection 20090 of Title 27 and not subject to the Federal Water Pollution Control Act. Exemptions from Title 27 may be granted for nine categories of discharges (e.g., sewage, wastewater, etc.) that meet, and continue to meet, the preconditions listed for each specific exemption. The scope of the WDRs Program also includes the discharge of wastes classified as inert, pursuant to section 20230 of Title 27.

Date of Government Version: 08/31/2022
Date Data Arrived at EDR: 08/31/2022
Date Made Active in Reports: 11/18/2022
Number of Days to Update: 79

Source: State Water Resources Control Board
Telephone: 916-341-5810
Last EDR Contact: 12/02/2022
Next Scheduled EDR Contact: 03/20/2023
Data Release Frequency: Quarterly

CIWQS: California Integrated Water Quality System
The California Integrated Water Quality System (CIWQS) is a computer system used by the State and Regional Water Quality Control Boards to track information about places of environmental interest, manage permits and other orders, track inspections, and manage violations and enforcement activities.

Date of Government Version: 08/16/2022
Date Data Arrived at EDR: 08/17/2022
Date Made Active in Reports: 08/18/2022
Number of Days to Update: 1

Source: State Water Resources Control Board
Telephone: 866-794-4977
Last EDR Contact: 11/29/2022
Next Scheduled EDR Contact: 03/13/2023
Data Release Frequency: Varies

CERS: CalEPA Regulated Site Portal Data
The CalEPA Regulated Site Portal database combines data about environmentally regulated sites and facilities in California into a single database. It combines data from a variety of state and federal databases, and provides an overview of regulated activities across the spectrum of environmental programs for any given location in California. These activities include hazardous materials and waste, state and federal cleanups, impacted ground and surface waters, and toxic materials

Date of Government Version: 07/18/2022
Date Data Arrived at EDR: 07/18/2022
Date Made Active in Reports: 09/30/2022
Number of Days to Update: 74

Source: California Environmental Protection Agency
Telephone: 916-323-2514
Last EDR Contact: 10/17/2022
Next Scheduled EDR Contact: 01/30/2023
Data Release Frequency: Varies

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

NON-CASE INFO: Non-Case Information Sites (GEOTRACKER)
Non-Case Information sites

Date of Government Version: 08/31/2022
Date Data Arrived at EDR: 08/31/2022
Date Made Active in Reports: 11/17/2022
Number of Days to Update: 78

Source: State Water Resources Control Board
Telephone: 866-480-1028
Last EDR Contact: 12/02/2022
Next Scheduled EDR Contact: 03/20/2023
Data Release Frequency: Varies

OTHER OIL GAS: Other Oil & Gas Projects Sites (GEOTRACKER)
Other Oil & Gas Projects sites

Date of Government Version: 08/31/2022
Date Data Arrived at EDR: 08/31/2022
Date Made Active in Reports: 11/17/2022
Number of Days to Update: 78

Source: State Water Resources Control Board
Telephone: 866-480-1028
Last EDR Contact: 12/02/2022
Next Scheduled EDR Contact: 03/20/2023
Data Release Frequency: Varies

PROD WATER PONDS: Produced Water Ponds Sites (GEOTRACKER)
Produced water ponds sites

Date of Government Version: 08/31/2022
Date Data Arrived at EDR: 08/31/2022
Date Made Active in Reports: 11/17/2022
Number of Days to Update: 78

Source: State Water Resources Control Board
Telephone: 866-480-1028
Last EDR Contact: 12/02/2022
Next Scheduled EDR Contact: 03/20/2023
Data Release Frequency: Varies

SAMPLING POINT: Sampling Point ? Public Sites (GEOTRACKER)
Sampling point - public sites

Date of Government Version: 08/31/2022
Date Data Arrived at EDR: 08/31/2022
Date Made Active in Reports: 11/17/2022
Number of Days to Update: 78

Source: State Water Resources Control Board
Telephone: 866-480-1028
Last EDR Contact: 12/02/2022
Next Scheduled EDR Contact: 03/20/2023
Data Release Frequency: Varies

WELL STIM PROJ: Well Stimulation Project (GEOTRACKER)
Includes areas of groundwater monitoring plans, a depiction of the monitoring network, and the facilities, boundaries, and subsurface characteristics of the oilfield and the features (oil and gas wells, produced water ponds, UIC wells, water supply wells, etc?) being monitored

Date of Government Version: 08/31/2022
Date Data Arrived at EDR: 08/31/2022
Date Made Active in Reports: 11/17/2022
Number of Days to Update: 78

Source: State Water Resources Control Board
Telephone: 866-480-1028
Last EDR Contact: 12/02/2022
Next Scheduled EDR Contact: 03/20/2023
Data Release Frequency: Varies

HWTS: Hazardous Waste Tracking System
DTSC maintains the Hazardous Waste Tracking System that stores ID number information since the early 1980s and manifest data since 1993. The system collects both manifest copies from the generator and destination facility.

Date of Government Version: 04/05/2022
Date Data Arrived at EDR: 04/05/2022
Date Made Active in Reports: 04/26/2022
Number of Days to Update: 21

Source: Department of Toxic Substances Control
Telephone: 916-324-2444
Last EDR Contact: 10/03/2022
Next Scheduled EDR Contact: 01/16/2023
Data Release Frequency: Varies

PCS ENF: Enforcement data
No description is available for this data

Date of Government Version: 12/31/2014
Date Data Arrived at EDR: 02/05/2015
Date Made Active in Reports: 03/06/2015
Number of Days to Update: 29

Source: EPA
Telephone: 202-564-2497
Last EDR Contact: 12/28/2022
Next Scheduled EDR Contact: 04/17/2023
Data Release Frequency: Varies

MINES MRDS: Mineral Resources Data System
Mineral Resources Data System

Date of Government Version: 04/06/2018
Date Data Arrived at EDR: 10/21/2019
Date Made Active in Reports: 10/24/2019
Number of Days to Update: 3

Source: USGS
Telephone: 703-648-6533
Last EDR Contact: 11/22/2022
Next Scheduled EDR Contact: 03/06/2023
Data Release Frequency: Varies

PCS: Permit Compliance System
PCS is a computerized management information system that contains data on National Pollutant Discharge Elimination System (NPDES) permit holding facilities. PCS tracks the permit, compliance, and enforcement status of NPDES facilities.

Date of Government Version: 07/14/2011
Date Data Arrived at EDR: 08/05/2011
Date Made Active in Reports: 09/29/2011
Number of Days to Update: 55

Source: EPA, Office of Water
Telephone: 202-564-2496
Last EDR Contact: 12/28/2022
Next Scheduled EDR Contact: 04/17/2023
Data Release Frequency: Semi-Annually

PCS INACTIVE: Listing of Inactive PCS Permits
An inactive permit is a facility that has shut down or is no longer discharging.

Date of Government Version: 11/05/2014
Date Data Arrived at EDR: 01/06/2015
Date Made Active in Reports: 05/06/2015
Number of Days to Update: 120

Source: EPA
Telephone: 202-564-2496
Last EDR Contact: 12/28/2022
Next Scheduled EDR Contact: 04/17/2023
Data Release Frequency: Semi-Annually

EDR HIGH RISK HISTORICAL RECORDS

EDR Exclusive Records

EDR MGP: EDR Proprietary Manufactured Gas Plants
The EDR Proprietary Manufactured Gas Plant Database includes records of coal gas plants (manufactured gas plants) compiled by EDR's researchers. Manufactured gas sites were used in the United States from the 1800's to 1950's to produce a gas that could be distributed and used as fuel. These plants used whale oil, rosin, coal, or a mixture of coal, oil, and water that also produced a significant amount of waste. Many of the byproducts of the gas production, such as coal tar (oily waste containing volatile and non-volatile chemicals), sludges, oils and other compounds are potentially hazardous to human health and the environment. The byproduct from this process was frequently disposed of directly at the plant site and can remain or spread slowly, serving as a continuous source of soil and groundwater contamination.

Date of Government Version: N/A
Date Data Arrived at EDR: N/A
Date Made Active in Reports: N/A
Number of Days to Update: N/A

Source: EDR, Inc.
Telephone: N/A
Last EDR Contact: N/A
Next Scheduled EDR Contact: N/A
Data Release Frequency: No Update Planned

EDR Hist Auto: EDR Exclusive Historical Auto Stations
EDR has searched selected national collections of business directories and has collected listings of potential gas station/filling station/service station sites that were available to EDR researchers. EDR's review was limited to those categories of sources that might, in EDR's opinion, include gas station/filling station/service station establishments. The categories reviewed included, but were not limited to gas, gas station, gasoline station, filling station, auto, automobile repair, auto service station, service station, etc. This database falls within a category of information EDR classifies as "High Risk Historical Records", or HRHR. EDR's HRHR effort presents unique and sometimes proprietary data about past sites and operations that typically create environmental concerns, but may not show up in current government records searches.

Date of Government Version: N/A
Date Data Arrived at EDR: N/A
Date Made Active in Reports: N/A
Number of Days to Update: N/A

Source: EDR, Inc.
Telephone: N/A
Last EDR Contact: N/A
Next Scheduled EDR Contact: N/A
Data Release Frequency: Varies

EDR Hist Cleaner: EDR Exclusive Historical Cleaners

EDR has searched selected national collections of business directories and has collected listings of potential dry cleaner sites that were available to EDR researchers. EDR's review was limited to those categories of sources that might, in EDR's opinion, include dry cleaning establishments. The categories reviewed included, but were not limited to dry cleaners, cleaners, laundry, laundromat, cleaning/laundry, wash & dry etc. This database falls within a category of information EDR classifies as "High Risk Historical Records", or HRHR. EDR's HRHR effort presents unique and sometimes proprietary data about past sites and operations that typically create environmental concerns, but may not show up in current government records searches.

Date of Government Version: N/A
Date Data Arrived at EDR: N/A
Date Made Active in Reports: N/A
Number of Days to Update: N/A

Source: EDR, Inc.
Telephone: N/A
Last EDR Contact: N/A
Next Scheduled EDR Contact: N/A
Data Release Frequency: Varies

EDR RECOVERED GOVERNMENT ARCHIVES

Exclusive Recovered Govt. Archives

RGA LF: Recovered Government Archive Solid Waste Facilities List

The EDR Recovered Government Archive Landfill database provides a list of landfills derived from historical databases and includes many records that no longer appear in current government lists. Compiled from Records formerly available from the Department of Resources Recycling and Recovery in California.

Date of Government Version: N/A
Date Data Arrived at EDR: 07/01/2013
Date Made Active in Reports: 01/13/2014
Number of Days to Update: 196

Source: Department of Resources Recycling and Recovery
Telephone: N/A
Last EDR Contact: 06/01/2012
Next Scheduled EDR Contact: N/A
Data Release Frequency: Varies

RGA LUST: Recovered Government Archive Leaking Underground Storage Tank

The EDR Recovered Government Archive Leaking Underground Storage Tank database provides a list of LUST incidents derived from historical databases and includes many records that no longer appear in current government lists. Compiled from Records formerly available from the State Water Resources Control Board in California.

Date of Government Version: N/A
Date Data Arrived at EDR: 07/01/2013
Date Made Active in Reports: 12/30/2013
Number of Days to Update: 182

Source: State Water Resources Control Board
Telephone: N/A
Last EDR Contact: 06/01/2012
Next Scheduled EDR Contact: N/A
Data Release Frequency: Varies

COUNTY RECORDS

ALAMEDA COUNTY:

CS ALAMEDA: Contaminated Sites

A listing of contaminated sites overseen by the Toxic Release Program (oil and groundwater contamination from chemical releases and spills) and the Leaking Underground Storage Tank Program (soil and ground water contamination from leaking petroleum USTs).

Date of Government Version: 01/09/2019
Date Data Arrived at EDR: 01/11/2019
Date Made Active in Reports: 03/05/2019
Number of Days to Update: 53

Source: Alameda County Environmental Health Services
Telephone: 510-567-6700
Last EDR Contact: 12/28/2022
Next Scheduled EDR Contact: 04/17/2023
Data Release Frequency: Semi-Annually

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

UST ALAMEDA: Underground Tanks
Underground storage tank sites located in Alameda county.

Date of Government Version: 09/28/2022
Date Data Arrived at EDR: 09/29/2022
Date Made Active in Reports: 12/14/2022
Number of Days to Update: 76

Source: Alameda County Environmental Health Services
Telephone: 510-567-6700
Last EDR Contact: 12/28/2022
Next Scheduled EDR Contact: 04/17/2023
Data Release Frequency: Semi-Annually

AMADOR COUNTY:

CUPA AMADOR: CUPA Facility List
Cupa Facility List

Date of Government Version: 07/22/2022
Date Data Arrived at EDR: 07/27/2022
Date Made Active in Reports: 08/01/2022
Number of Days to Update: 5

Source: Amador County Environmental Health
Telephone: 209-223-6439
Last EDR Contact: 10/26/2022
Next Scheduled EDR Contact: 02/13/2023
Data Release Frequency: Varies

BUTTE COUNTY:

CUPA BUTTE: CUPA Facility Listing
Cupa facility list.

Date of Government Version: 04/21/2017
Date Data Arrived at EDR: 04/25/2017
Date Made Active in Reports: 08/09/2017
Number of Days to Update: 106

Source: Public Health Department
Telephone: 530-538-7149
Last EDR Contact: 12/28/2022
Next Scheduled EDR Contact: 04/17/2023
Data Release Frequency: No Update Planned

CALVERAS COUNTY:

CUPA CALVERAS: CUPA Facility Listing
Cupa Facility Listing

Date of Government Version: 12/13/2022
Date Data Arrived at EDR: 12/15/2022
Date Made Active in Reports: 12/21/2022
Number of Days to Update: 6

Source: Calveras County Environmental Health
Telephone: 209-754-6399
Last EDR Contact: 12/13/2022
Next Scheduled EDR Contact: 04/03/2023
Data Release Frequency: Quarterly

COLUSA COUNTY:

CUPA COLUSA: CUPA Facility List
Cupa facility list.

Date of Government Version: 04/06/2020
Date Data Arrived at EDR: 04/23/2020
Date Made Active in Reports: 07/10/2020
Number of Days to Update: 78

Source: Health & Human Services
Telephone: 530-458-0396
Last EDR Contact: 10/26/2022
Next Scheduled EDR Contact: 02/16/2023
Data Release Frequency: Semi-Annually

CONTRA COSTA COUNTY:

SL CONTRA COSTA: Site List
List includes sites from the underground tank, hazardous waste generator and business plan/2185 programs.

Date of Government Version: 07/20/2022
Date Data Arrived at EDR: 07/20/2022
Date Made Active in Reports: 10/03/2022
Number of Days to Update: 75

Source: Contra Costa Health Services Department
Telephone: 925-646-2286
Last EDR Contact: 10/20/2022
Next Scheduled EDR Contact: 02/06/2023
Data Release Frequency: Semi-Annually

DEL NORTE COUNTY:

CUPA DEL NORTE: CUPA Facility List
Cupa Facility list

Date of Government Version: 05/04/2022
Date Data Arrived at EDR: 05/06/2022
Date Made Active in Reports: 07/28/2022
Number of Days to Update: 83

Source: Del Norte County Environmental Health Division
Telephone: 707-465-0426
Last EDR Contact: 10/20/2022
Next Scheduled EDR Contact: 02/06/2023
Data Release Frequency: Varies

EL DORADO COUNTY:

CUPA EL DORADO: CUPA Facility List
CUPA facility list.

Date of Government Version: 08/08/2022
Date Data Arrived at EDR: 08/09/2022
Date Made Active in Reports: 09/01/2022
Number of Days to Update: 23

Source: El Dorado County Environmental Management Department
Telephone: 530-621-6623
Last EDR Contact: 10/20/2022
Next Scheduled EDR Contact: 02/06/2023
Data Release Frequency: Varies

FRESNO COUNTY:

CUPA FRESNO: CUPA Resources List
Certified Unified Program Agency. CUPA's are responsible for implementing a unified hazardous materials and hazardous waste management regulatory program. The agency provides oversight of businesses that deal with hazardous materials, operate underground storage tanks or aboveground storage tanks.

Date of Government Version: 06/28/2021
Date Data Arrived at EDR: 12/21/2021
Date Made Active in Reports: 03/03/2022
Number of Days to Update: 72

Source: Dept. of Community Health
Telephone: 559-445-3271
Last EDR Contact: 12/29/2022
Next Scheduled EDR Contact: 04/10/2023
Data Release Frequency: Semi-Annually

GLENN COUNTY:

CUPA GLENN: CUPA Facility List
Cupa facility list

Date of Government Version: 01/22/2018
Date Data Arrived at EDR: 01/24/2018
Date Made Active in Reports: 03/14/2018
Number of Days to Update: 49

Source: Glenn County Air Pollution Control District
Telephone: 830-934-6500
Last EDR Contact: 10/11/2022
Next Scheduled EDR Contact: 01/30/2023
Data Release Frequency: No Update Planned

HUMBOLDT COUNTY:

CUPA HUMBOLDT: CUPA Facility List
CUPA facility list.

Date of Government Version: 08/12/2021
Date Data Arrived at EDR: 08/12/2021
Date Made Active in Reports: 11/08/2021
Number of Days to Update: 88

Source: Humboldt County Environmental Health
Telephone: N/A
Last EDR Contact: 11/08/2022
Next Scheduled EDR Contact: 02/27/2023
Data Release Frequency: Semi-Annually

IMPERIAL COUNTY:

CUPA IMPERIAL: CUPA Facility List
Cupa facility list.

Date of Government Version: 10/11/2022
Date Data Arrived at EDR: 10/12/2022
Date Made Active in Reports: 12/29/2022
Number of Days to Update: 78

Source: San Diego Border Field Office
Telephone: 760-339-2777
Last EDR Contact: 10/11/2022
Next Scheduled EDR Contact: 01/30/2023
Data Release Frequency: Varies

INYO COUNTY:

CUPA INYO: CUPA Facility List
Cupa facility list.

Date of Government Version: 04/02/2018
Date Data Arrived at EDR: 04/03/2018
Date Made Active in Reports: 06/14/2018
Number of Days to Update: 72

Source: Inyo County Environmental Health Services
Telephone: 760-878-0238
Last EDR Contact: 11/08/2022
Next Scheduled EDR Contact: 02/27/2023
Data Release Frequency: Varies

KERN COUNTY:

CUPA KERN: CUPA Facility List
A listing of sites included in the Kern County Hazardous Material Business Plan.

Date of Government Version: 10/03/2022
Date Data Arrived at EDR: 10/05/2022
Date Made Active in Reports: 12/16/2022
Number of Days to Update: 72

Source: Kern County Public Health
Telephone: 661-321-3000
Last EDR Contact: 10/05/2022
Next Scheduled EDR Contact: 02/16/2023
Data Release Frequency: Varies

UST KERN: Underground Storage Tank Sites & Tank Listing
Kern County Sites and Tanks Listing.

Date of Government Version: 10/03/2022
Date Data Arrived at EDR: 10/05/2022
Date Made Active in Reports: 12/16/2022
Number of Days to Update: 72

Source: Kern County Environment Health Services Department
Telephone: 661-862-8700
Last EDR Contact: 10/05/2022
Next Scheduled EDR Contact: 02/16/2023
Data Release Frequency: Quarterly

KINGS COUNTY:

CUPA KINGS: CUPA Facility List
A listing of sites included in the county's Certified Unified Program Agency database. California's Secretary for Environmental Protection established the unified hazardous materials and hazardous waste regulatory program as required by chapter 6.11 of the California Health and Safety Code. The Unified Program consolidates the administration, permits, inspections, and enforcement activities.

Date of Government Version: 12/03/2020
Date Data Arrived at EDR: 01/26/2021
Date Made Active in Reports: 04/14/2021
Number of Days to Update: 78

Source: Kings County Department of Public Health
Telephone: 559-584-1411
Last EDR Contact: 11/08/2022
Next Scheduled EDR Contact: 02/27/2023
Data Release Frequency: Varies

LAKE COUNTY:

CUPA LAKE: CUPA Facility List
Cupa facility list

Date of Government Version: 07/22/2022
Date Data Arrived at EDR: 07/25/2022
Date Made Active in Reports: 10/05/2022
Number of Days to Update: 72

Source: Lake County Environmental Health
Telephone: 707-263-1164
Last EDR Contact: 10/04/2022
Next Scheduled EDR Contact: 01/23/2023
Data Release Frequency: Varies

LASSEN COUNTY:

CUPA LASSEN: CUPA Facility List
Cupa facility list

Date of Government Version: 07/31/2020
Date Data Arrived at EDR: 08/21/2020
Date Made Active in Reports: 11/09/2020
Number of Days to Update: 80

Source: Lassen County Environmental Health
Telephone: 530-251-8528
Last EDR Contact: 10/11/2022
Next Scheduled EDR Contact: 01/30/2023
Data Release Frequency: Varies

LOS ANGELES COUNTY:

AOCONCERN: Key Areas of Concerns in Los Angeles County
San Gabriel Valley areas where VOC contamination is at or above the MCL as designated by region 9 EPA office. Date of Government Version: 3/30/2009 Exide Site area is a cleanup plan of lead-impacted soil surrounding the former Exide Facility as designated by the DTSC. Date of Government Version: 7/17/2017

Date of Government Version: 03/30/2009
Date Data Arrived at EDR: 03/31/2009
Date Made Active in Reports: 10/23/2009
Number of Days to Update: 206

Source: N/A
Telephone: N/A
Last EDR Contact: 12/06/2022
Next Scheduled EDR Contact: 03/27/2023
Data Release Frequency: No Update Planned

HMS LOS ANGELES: HMS: Street Number List
Industrial Waste and Underground Storage Tank Sites.

Date of Government Version: 10/03/2022
Date Data Arrived at EDR: 10/04/2022
Date Made Active in Reports: 12/15/2022
Number of Days to Update: 72

Source: Department of Public Works
Telephone: 626-458-3517
Last EDR Contact: 12/28/2022
Next Scheduled EDR Contact: 04/17/2023
Data Release Frequency: Semi-Annually

LF LOS ANGELES: List of Solid Waste Facilities
Solid Waste Facilities in Los Angeles County.

Date of Government Version: 10/07/2022
Date Data Arrived at EDR: 10/07/2022
Date Made Active in Reports: 12/21/2022
Number of Days to Update: 75

Source: La County Department of Public Works
Telephone: 818-458-5185
Last EDR Contact: 10/07/2022
Next Scheduled EDR Contact: 01/23/2023
Data Release Frequency: Varies

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

LF LOS ANGELES CITY: City of Los Angeles Landfills
Landfills owned and maintained by the City of Los Angeles.

Date of Government Version: 01/01/2022
Date Data Arrived at EDR: 01/21/2022
Date Made Active in Reports: 04/11/2022
Number of Days to Update: 80

Source: Engineering & Construction Division
Telephone: 213-473-7869
Last EDR Contact: 10/04/2022
Next Scheduled EDR Contact: 01/23/2023
Data Release Frequency: Varies

LOS ANGELES AST: Active & Inactive AST Inventory
A listing of active & inactive above ground petroleum storage tank site locations, located in the City of Los Angeles.

Date of Government Version: 06/01/2019
Date Data Arrived at EDR: 06/25/2019
Date Made Active in Reports: 08/22/2019
Number of Days to Update: 58

Source: Los Angeles Fire Department
Telephone: 213-978-3800
Last EDR Contact: 12/13/2022
Next Scheduled EDR Contact: 04/03/2023
Data Release Frequency: Varies

LOS ANGELES CO LF METHANE: Methane Producing Landfills
This data was created on April 30, 2012 to represent known disposal sites in Los Angeles County that may produce and emanate methane gas. The shapefile contains disposal sites within Los Angeles County that once accepted degradable refuse material. Information used to create this data was extracted from a landfill survey performed by County Engineers (Major Waste System Map, 1973) as well as historical records from CalRecycle, Regional Water Quality Control Board, and Los Angeles County Department of Public Health

Date of Government Version: 01/10/2022
Date Data Arrived at EDR: 01/12/2022
Date Made Active in Reports: 04/04/2022
Number of Days to Update: 82

Source: Los Angeles County Department of Public Works
Telephone: 626-458-6973
Last EDR Contact: 10/04/2022
Next Scheduled EDR Contact: 01/23/2023
Data Release Frequency: No Update Planned

LOS ANGELES HM: Active & Inactive Hazardous Materials Inventory
A listing of active & inactive hazardous materials facility locations, located in the City of Los Angeles.

Date of Government Version: 08/30/2022
Date Data Arrived at EDR: 09/20/2022
Date Made Active in Reports: 12/07/2022
Number of Days to Update: 78

Source: Los Angeles Fire Department
Telephone: 213-978-3800
Last EDR Contact: 12/14/2022
Next Scheduled EDR Contact: 04/03/2023
Data Release Frequency: Varies

LOS ANGELES UST: Active & Inactive UST Inventory
A listing of active & inactive underground storage tank site locations and underground storage tank historical sites, located in the City of Los Angeles.

Date of Government Version: 08/30/2022
Date Data Arrived at EDR: 09/20/2022
Date Made Active in Reports: 12/08/2022
Number of Days to Update: 79

Source: Los Angeles Fire Department
Telephone: 213-978-3800
Last EDR Contact: 12/14/2022
Next Scheduled EDR Contact: 04/03/2023
Data Release Frequency: Varies

SITE MIT LOS ANGELES: Site Mitigation List
Industrial sites that have had some sort of spill or complaint.

Date of Government Version: 05/26/2021
Date Data Arrived at EDR: 07/09/2021
Date Made Active in Reports: 09/29/2021
Number of Days to Update: 82

Source: Community Health Services
Telephone: 323-890-7806
Last EDR Contact: 10/20/2022
Next Scheduled EDR Contact: 01/30/2023
Data Release Frequency: Annually

UST EL SEGUNDO: City of El Segundo Underground Storage Tank
Underground storage tank sites located in El Segundo city.

Date of Government Version: 01/21/2017
Date Data Arrived at EDR: 04/19/2017
Date Made Active in Reports: 05/10/2017
Number of Days to Update: 21

Source: City of El Segundo Fire Department
Telephone: 310-524-2236
Last EDR Contact: 10/04/2022
Next Scheduled EDR Contact: 01/23/2023
Data Release Frequency: No Update Planned

UST LONG BEACH: City of Long Beach Underground Storage Tank
Underground storage tank sites located in the city of Long Beach.

Date of Government Version: 04/22/2019
Date Data Arrived at EDR: 04/23/2019
Date Made Active in Reports: 06/27/2019
Number of Days to Update: 65

Source: City of Long Beach Fire Department
Telephone: 562-570-2563
Last EDR Contact: 10/11/2022
Next Scheduled EDR Contact: 01/30/2023
Data Release Frequency: Varies

UST TORRANCE: City of Torrance Underground Storage Tank
Underground storage tank sites located in the city of Torrance.

Date of Government Version: 04/22/2022
Date Data Arrived at EDR: 07/19/2022
Date Made Active in Reports: 09/30/2022
Number of Days to Update: 73

Source: City of Torrance Fire Department
Telephone: 310-618-2973
Last EDR Contact: 10/11/2022
Next Scheduled EDR Contact: 01/30/2023
Data Release Frequency: Semi-Annually

MADERA COUNTY:

CUPA MADERA: CUPA Facility List
A listing of sites included in the county's Certified Unified Program Agency database. California's Secretary for Environmental Protection established the unified hazardous materials and hazardous waste regulatory program as required by chapter 6.11 of the California Health and Safety Code. The Unified Program consolidates the administration, permits, inspections, and enforcement activities.

Date of Government Version: 08/10/2020
Date Data Arrived at EDR: 08/12/2020
Date Made Active in Reports: 10/23/2020
Number of Days to Update: 72

Source: Madera County Environmental Health
Telephone: 559-675-7823
Last EDR Contact: 11/08/2022
Next Scheduled EDR Contact: 02/27/2023
Data Release Frequency: Varies

MARIN COUNTY:

UST MARIN: Underground Storage Tank Sites
Currently permitted USTs in Marin County.

Date of Government Version: 09/26/2018
Date Data Arrived at EDR: 10/04/2018
Date Made Active in Reports: 11/02/2018
Number of Days to Update: 29

Source: Public Works Department Waste Management
Telephone: 415-473-6647
Last EDR Contact: 12/19/2022
Next Scheduled EDR Contact: 04/10/2023
Data Release Frequency: Semi-Annually

MENDOCINO COUNTY:

UST MENDOCINO: Mendocino County UST Database
A listing of underground storage tank locations in Mendocino County.

Date of Government Version: 09/22/2021
Date Data Arrived at EDR: 11/18/2021
Date Made Active in Reports: 11/22/2021
Number of Days to Update: 4

Source: Department of Public Health
Telephone: 707-463-4466
Last EDR Contact: 11/15/2022
Next Scheduled EDR Contact: 03/06/2023
Data Release Frequency: Annually

MERCED COUNTY:

CUPA MERCED: CUPA Facility List
CUPA facility list.

Date of Government Version: 02/15/2022
Date Data Arrived at EDR: 02/17/2022
Date Made Active in Reports: 05/11/2022
Number of Days to Update: 83

Source: Merced County Environmental Health
Telephone: 209-381-1094
Last EDR Contact: 11/08/2022
Next Scheduled EDR Contact: 02/27/2023
Data Release Frequency: Varies

MONO COUNTY:

CUPA MONO: CUPA Facility List
CUPA Facility List

Date of Government Version: 02/22/2021
Date Data Arrived at EDR: 03/02/2021
Date Made Active in Reports: 05/19/2021
Number of Days to Update: 78

Source: Mono County Health Department
Telephone: 760-932-5580
Last EDR Contact: 11/15/2022
Next Scheduled EDR Contact: 03/06/2023
Data Release Frequency: Varies

MONTEREY COUNTY:

CUPA MONTEREY: CUPA Facility Listing
CUPA Program listing from the Environmental Health Division.

Date of Government Version: 10/04/2021
Date Data Arrived at EDR: 10/06/2021
Date Made Active in Reports: 12/29/2021
Number of Days to Update: 84

Source: Monterey County Health Department
Telephone: 831-796-1297
Last EDR Contact: 12/19/2022
Next Scheduled EDR Contact: 04/10/2023
Data Release Frequency: Varies

NAPA COUNTY:

LUST NAPA: Sites With Reported Contamination
A listing of leaking underground storage tank sites located in Napa county.

Date of Government Version: 01/09/2017
Date Data Arrived at EDR: 01/11/2017
Date Made Active in Reports: 03/02/2017
Number of Days to Update: 50

Source: Napa County Department of Environmental Management
Telephone: 707-253-4269
Last EDR Contact: 11/15/2022
Next Scheduled EDR Contact: 03/06/2023
Data Release Frequency: No Update Planned

UST NAPA: Closed and Operating Underground Storage Tank Sites
Underground storage tank sites located in Napa county.

Date of Government Version: 09/05/2019
Date Data Arrived at EDR: 09/09/2019
Date Made Active in Reports: 10/31/2019
Number of Days to Update: 52

Source: Napa County Department of Environmental Management
Telephone: 707-253-4269
Last EDR Contact: 11/15/2022
Next Scheduled EDR Contact: 03/06/2023
Data Release Frequency: No Update Planned

NEVADA COUNTY:

CUPA NEVADA: CUPA Facility List
CUPA facility list.

Date of Government Version: 07/21/2022
Date Data Arrived at EDR: 07/25/2022
Date Made Active in Reports: 07/28/2022
Number of Days to Update: 3

Source: Community Development Agency
Telephone: 530-265-1467
Last EDR Contact: 10/20/2022
Next Scheduled EDR Contact: 02/06/2023
Data Release Frequency: Varies

ORANGE COUNTY:

IND_SITE ORANGE: List of Industrial Site Cleanups
Petroleum and non-petroleum spills.

Date of Government Version: 05/24/2022
Date Data Arrived at EDR: 08/09/2022
Date Made Active in Reports: 10/28/2022
Number of Days to Update: 80

Source: Health Care Agency
Telephone: 714-834-3446
Last EDR Contact: 11/03/2022
Next Scheduled EDR Contact: 02/13/2023
Data Release Frequency: Annually

LUST ORANGE: List of Underground Storage Tank Cleanups
Orange County Underground Storage Tank Cleanups (LUST).

Date of Government Version: 04/08/2022
Date Data Arrived at EDR: 05/18/2022
Date Made Active in Reports: 08/03/2022
Number of Days to Update: 77

Source: Health Care Agency
Telephone: 714-834-3446
Last EDR Contact: 11/03/2022
Next Scheduled EDR Contact: 02/13/2023
Data Release Frequency: Quarterly

UST ORANGE: List of Underground Storage Tank Facilities
Orange County Underground Storage Tank Facilities (UST).

Date of Government Version: 05/24/2022
Date Data Arrived at EDR: 08/01/2022
Date Made Active in Reports: 10/20/2022
Number of Days to Update: 80

Source: Health Care Agency
Telephone: 714-834-3446
Last EDR Contact: 11/03/2022
Next Scheduled EDR Contact: 02/13/2023
Data Release Frequency: Quarterly

PLACER COUNTY:

MS PLACER: Master List of Facilities
List includes aboveground tanks, underground tanks and cleanup sites.

Date of Government Version: 08/26/2022
Date Data Arrived at EDR: 08/29/2022
Date Made Active in Reports: 11/15/2022
Number of Days to Update: 78

Source: Placer County Health and Human Services
Telephone: 530-745-2363
Last EDR Contact: 11/22/2022
Next Scheduled EDR Contact: 03/13/2023
Data Release Frequency: Semi-Annually

PLUMAS COUNTY:

CUPA PLUMAS: CUPA Facility List
Plumas County CUPA Program facilities.

Date of Government Version: 03/31/2019
Date Data Arrived at EDR: 04/23/2019
Date Made Active in Reports: 06/26/2019
Number of Days to Update: 64

Source: Plumas County Environmental Health
Telephone: 530-283-6355
Last EDR Contact: 10/11/2022
Next Scheduled EDR Contact: 01/30/2023
Data Release Frequency: Varies

RIVERSIDE COUNTY:

LUST RIVERSIDE: Listing of Underground Tank Cleanup Sites
Riverside County Underground Storage Tank Cleanup Sites (LUST).

Date of Government Version: 09/22/2022
Date Data Arrived at EDR: 09/26/2022
Date Made Active in Reports: 12/09/2022
Number of Days to Update: 74
Source: Department of Environmental Health
Telephone: 951-358-5055
Last EDR Contact: 12/06/2022
Next Scheduled EDR Contact: 03/27/2023
Data Release Frequency: Quarterly

UST RIVERSIDE: Underground Storage Tank Tank List
Underground storage tank sites located in Riverside county.

Date of Government Version: 09/22/2022
Date Data Arrived at EDR: 09/26/2022
Date Made Active in Reports: 12/09/2022
Number of Days to Update: 74
Source: Department of Environmental Health
Telephone: 951-358-5055
Last EDR Contact: 12/06/2022
Next Scheduled EDR Contact: 03/27/2023
Data Release Frequency: Quarterly

SACRAMENTO COUNTY:

CS SACRAMENTO: Toxic Site Clean-Up List
List of sites where unauthorized releases of potentially hazardous materials have occurred.

Date of Government Version: 06/18/2021
Date Data Arrived at EDR: 09/28/2021
Date Made Active in Reports: 12/14/2021
Number of Days to Update: 77
Source: Sacramento County Environmental Management
Telephone: 916-875-8406
Last EDR Contact: 12/21/2022
Next Scheduled EDR Contact: 04/10/2023
Data Release Frequency: Quarterly

ML SACRAMENTO: Master Hazardous Materials Facility List
Any business that has hazardous materials on site - hazardous material storage sites, underground storage tanks, waste generators.

Date of Government Version: 05/04/2022
Date Data Arrived at EDR: 06/30/2022
Date Made Active in Reports: 07/05/2022
Number of Days to Update: 5
Source: Sacramento County Environmental Management
Telephone: 916-875-8406
Last EDR Contact: 12/09/2022
Next Scheduled EDR Contact: 04/10/2023
Data Release Frequency: Quarterly

SAN BENITO COUNTY:

CUPA SAN BENITO: CUPA Facility List
Cupa facility list

Date of Government Version: 07/27/2022
Date Data Arrived at EDR: 07/27/2022
Date Made Active in Reports: 10/11/2022
Number of Days to Update: 76
Source: San Benito County Environmental Health
Telephone: N/A
Last EDR Contact: 10/26/2022
Next Scheduled EDR Contact: 02/16/2023
Data Release Frequency: Varies

SAN BERNARDINO COUNTY:

PERMITS SAN BERNARDINO: Hazardous Material Permits
This listing includes underground storage tanks, medical waste handlers/generators, hazardous materials handlers, hazardous waste generators, and waste oil generators/handlers.

Date of Government Version: 08/22/2022
Date Data Arrived at EDR: 08/23/2022
Date Made Active in Reports: 11/11/2022
Number of Days to Update: 80

Source: San Bernardino County Fire Department Hazardous Materials Division
Telephone: 909-387-3041
Last EDR Contact: 10/28/2022
Next Scheduled EDR Contact: 02/16/2023
Data Release Frequency: Quarterly

SAN DIEGO COUNTY:

HMMD SAN DIEGO: Hazardous Materials Management Division Database

The database includes: HE58 - This report contains the business name, site address, business phone number, establishment 'H' permit number, type of permit, and the business status. HE17 - In addition to providing the same information provided in the HE58 listing, HE17 provides inspection dates, violations received by the establishment, hazardous waste generated, the quantity, method of storage, treatment/disposal of waste and the hauler, and information on underground storage tanks. Unauthorized Release List - Includes a summary of environmental contamination cases in San Diego County (underground tank cases, non-tank cases, groundwater contamination, and soil contamination are included.)

Date of Government Version: 08/25/2022
Date Data Arrived at EDR: 08/25/2022
Date Made Active in Reports: 11/15/2022
Number of Days to Update: 82

Source: Hazardous Materials Management Division
Telephone: 619-338-2268
Last EDR Contact: 11/29/2022
Next Scheduled EDR Contact: 03/13/2023
Data Release Frequency: Quarterly

LF SAN DIEGO: Solid Waste Facilities

San Diego County Solid Waste Facilities.

Date of Government Version: 10/27/2021
Date Data Arrived at EDR: 03/04/2022
Date Made Active in Reports: 05/31/2022
Number of Days to Update: 88

Source: Department of Health Services
Telephone: 619-338-2209
Last EDR Contact: 10/11/2022
Next Scheduled EDR Contact: 01/30/2023
Data Release Frequency: Varies

SAN DIEGO CO LOP: Local Oversight Program Listing

A listing of all LOP release sites that are or were under the County of San Diego's jurisdiction. Included are closed or transferred cases, open cases, and cases that did not have a case type indicated. The cases without a case type are mostly complaints; however, some of them could be LOP cases.

Date of Government Version: 07/22/2021
Date Data Arrived at EDR: 10/19/2021
Date Made Active in Reports: 01/13/2022
Number of Days to Update: 86

Source: Department of Environmental Health
Telephone: 858-505-6874
Last EDR Contact: 10/11/2022
Next Scheduled EDR Contact: 01/30/2023
Data Release Frequency: Varies

SAN DIEGO CO SAM: Environmental Case Listing

The listing contains all underground tank release cases and projects pertaining to properties contaminated with hazardous substances that are actively under review by the Site Assessment and Mitigation Program.

Date of Government Version: 03/23/2010
Date Data Arrived at EDR: 06/15/2010
Date Made Active in Reports: 07/09/2010
Number of Days to Update: 24

Source: San Diego County Department of Environmental Health
Telephone: 619-338-2371
Last EDR Contact: 11/22/2022
Next Scheduled EDR Contact: 03/13/2023
Data Release Frequency: No Update Planned

SAN FRANCISCO COUNTY:

CUPA SAN FRANCISCO CO: CUPA Facility Listing

Cupa facilities

Date of Government Version: 08/04/2022
Date Data Arrived at EDR: 08/04/2022
Date Made Active in Reports: 10/20/2022
Number of Days to Update: 77

Source: San Francisco County Department of Environmental Health
Telephone: 415-252-3896
Last EDR Contact: 10/26/2022
Next Scheduled EDR Contact: 02/16/2023
Data Release Frequency: Varies

LUST SAN FRANCISCO: Local Oversite Facilities
A listing of leaking underground storage tank sites located in San Francisco county.

Date of Government Version: 09/19/2008
Date Data Arrived at EDR: 09/19/2008
Date Made Active in Reports: 09/29/2008
Number of Days to Update: 10

Source: Department Of Public Health San Francisco County
Telephone: 415-252-3920
Last EDR Contact: 10/26/2022
Next Scheduled EDR Contact: 02/16/2023
Data Release Frequency: No Update Planned

UST SAN FRANCISCO: Underground Storage Tank Information
Underground storage tank sites located in San Francisco county.

Date of Government Version: 08/04/2022
Date Data Arrived at EDR: 08/04/2022
Date Made Active in Reports: 10/20/2022
Number of Days to Update: 77

Source: Department of Public Health
Telephone: 415-252-3920
Last EDR Contact: 10/26/2022
Next Scheduled EDR Contact: 02/13/2023
Data Release Frequency: Quarterly

SAN FRANCISO COUNTY:

SAN FRANCISCO MAHER: Maher Ordinance Property Listing
a listing of properties that fall within a Maher Ordinance, for all of San Francisco

Date of Government Version: 01/18/2022
Date Data Arrived at EDR: 01/20/2022
Date Made Active in Reports: 04/27/2022
Number of Days to Update: 97

Source: San Francisco Planning
Telephone: 628-652-7483
Last EDR Contact: 10/07/2022
Next Scheduled EDR Contact: 01/30/2023
Data Release Frequency: Varies

SAN JOAQUIN COUNTY:

UST SAN JOAQUIN: San Joaquin Co. UST
A listing of underground storage tank locations in San Joaquin county.

Date of Government Version: 06/22/2018
Date Data Arrived at EDR: 06/26/2018
Date Made Active in Reports: 07/11/2018
Number of Days to Update: 15

Source: Environmental Health Department
Telephone: N/A
Last EDR Contact: 12/06/2022
Next Scheduled EDR Contact: 03/27/2023
Data Release Frequency: Semi-Annually

SAN LUIS OBISPO COUNTY:

CUPA SAN LUIS OBISPO: CUPA Facility List
Cupa Facility List.

Date of Government Version: 08/10/2022
Date Data Arrived at EDR: 08/11/2022
Date Made Active in Reports: 10/28/2022
Number of Days to Update: 78

Source: San Luis Obispo County Public Health Department
Telephone: 805-781-5596
Last EDR Contact: 11/08/2022
Next Scheduled EDR Contact: 02/27/2023
Data Release Frequency: Varies

SAN MATEO COUNTY:

BI SAN MATEO: Business Inventory
List includes Hazardous Materials Business Plan, hazardous waste generators, and underground storage tanks.

Date of Government Version: 02/20/2020
Date Data Arrived at EDR: 02/20/2020
Date Made Active in Reports: 04/24/2020
Number of Days to Update: 64
Source: San Mateo County Environmental Health Services Division
Telephone: 650-363-1921
Last EDR Contact: 12/09/2022
Next Scheduled EDR Contact: 03/20/2023
Data Release Frequency: Annually

LUST SAN MATEO: Fuel Leak List
A listing of leaking underground storage tank sites located in San Mateo county.

Date of Government Version: 03/29/2019
Date Data Arrived at EDR: 03/29/2019
Date Made Active in Reports: 05/29/2019
Number of Days to Update: 61
Source: San Mateo County Environmental Health Services Division
Telephone: 650-363-1921
Last EDR Contact: 11/30/2022
Next Scheduled EDR Contact: 03/20/2023
Data Release Frequency: Semi-Annually

SANTA BARBARA COUNTY:

CUPA SANTA BARBARA: CUPA Facility Listing
CUPA Program Listing from the Environmental Health Services division.

Date of Government Version: 09/08/2011
Date Data Arrived at EDR: 09/09/2011
Date Made Active in Reports: 10/07/2011
Number of Days to Update: 28
Source: Santa Barbara County Public Health Department
Telephone: 805-686-8167
Last EDR Contact: 11/08/2022
Next Scheduled EDR Contact: 02/27/2023
Data Release Frequency: No Update Planned

SANTA CLARA COUNTY:

CUPA SANTA CLARA: Cupa Facility List
Cupa facility list

Date of Government Version: 05/16/2022
Date Data Arrived at EDR: 05/18/2022
Date Made Active in Reports: 08/04/2022
Number of Days to Update: 78
Source: Department of Environmental Health
Telephone: 408-918-1973
Last EDR Contact: 10/28/2022
Next Scheduled EDR Contact: 02/27/2023
Data Release Frequency: Varies

HIST LUST SANTA CLARA: HIST LUST - Fuel Leak Site Activity Report
A listing of open and closed leaking underground storage tanks. This listing is no longer updated by the county. Leaking underground storage tanks are now handled by the Department of Environmental Health.

Date of Government Version: 03/29/2005
Date Data Arrived at EDR: 03/30/2005
Date Made Active in Reports: 04/21/2005
Number of Days to Update: 22
Source: Santa Clara Valley Water District
Telephone: 408-265-2600
Last EDR Contact: 03/23/2009
Next Scheduled EDR Contact: 06/22/2009
Data Release Frequency: No Update Planned

LUST SANTA CLARA: LOP Listing
A listing of leaking underground storage tanks located in Santa Clara county.

Date of Government Version: 03/03/2014
Date Data Arrived at EDR: 03/05/2014
Date Made Active in Reports: 03/18/2014
Number of Days to Update: 13
Source: Department of Environmental Health
Telephone: 408-918-3417
Last EDR Contact: 11/15/2022
Next Scheduled EDR Contact: 03/06/2023
Data Release Frequency: No Update Planned

SAN JOSE HAZMAT: Hazardous Material Facilities
Hazardous material facilities, including underground storage tank sites.

Date of Government Version: 11/03/2020
Date Data Arrived at EDR: 11/05/2020
Date Made Active in Reports: 01/26/2021
Number of Days to Update: 82

Source: City of San Jose Fire Department
Telephone: 408-535-7694
Last EDR Contact: 10/26/2022
Next Scheduled EDR Contact: 02/16/2023
Data Release Frequency: Annually

SANTA CRUZ COUNTY:

CUPA SANTA CRUZ: CUPA Facility List
CUPA facility listing.

Date of Government Version: 01/21/2017
Date Data Arrived at EDR: 02/22/2017
Date Made Active in Reports: 05/23/2017
Number of Days to Update: 90

Source: Santa Cruz County Environmental Health
Telephone: 831-464-2761
Last EDR Contact: 11/08/2022
Next Scheduled EDR Contact: 02/27/2023
Data Release Frequency: Varies

SHASTA COUNTY:

CUPA SHASTA: CUPA Facility List
Cupa Facility List.

Date of Government Version: 06/15/2017
Date Data Arrived at EDR: 06/19/2017
Date Made Active in Reports: 08/09/2017
Number of Days to Update: 51

Source: Shasta County Department of Resource Management
Telephone: 530-225-5789
Last EDR Contact: 11/08/2022
Next Scheduled EDR Contact: 02/27/2023
Data Release Frequency: Varies

SOLANO COUNTY:

LUST SOLANO: Leaking Underground Storage Tanks
A listing of leaking underground storage tank sites located in Solano county.

Date of Government Version: 06/04/2019
Date Data Arrived at EDR: 06/06/2019
Date Made Active in Reports: 08/13/2019
Number of Days to Update: 68

Source: Solano County Department of Environmental Management
Telephone: 707-784-6770
Last EDR Contact: 11/22/2022
Next Scheduled EDR Contact: 03/13/2023
Data Release Frequency: Quarterly

UST SOLANO: Underground Storage Tanks
Underground storage tank sites located in Solano county.

Date of Government Version: 09/15/2021
Date Data Arrived at EDR: 09/16/2021
Date Made Active in Reports: 12/09/2021
Number of Days to Update: 84

Source: Solano County Department of Environmental Management
Telephone: 707-784-6770
Last EDR Contact: 11/22/2022
Next Scheduled EDR Contact: 03/13/2023
Data Release Frequency: Quarterly

SONOMA COUNTY:

CUPA SONOMA: Cupa Facility List
Cupa Facility list

Date of Government Version: 07/02/2021
Date Data Arrived at EDR: 07/06/2021
Date Made Active in Reports: 07/14/2021
Number of Days to Update: 8

Source: County of Sonoma Fire & Emergency Services Department
Telephone: 707-565-1174
Last EDR Contact: 12/13/2022
Next Scheduled EDR Contact: 04/03/2023
Data Release Frequency: Varies

LUST SONOMA: Leaking Underground Storage Tank Sites
A listing of leaking underground storage tank sites located in Sonoma county.

Date of Government Version: 06/30/2021
Date Data Arrived at EDR: 06/30/2021
Date Made Active in Reports: 09/24/2021
Number of Days to Update: 86

Source: Department of Health Services
Telephone: 707-565-6565
Last EDR Contact: 12/13/2022
Next Scheduled EDR Contact: 04/03/2023
Data Release Frequency: Quarterly

STANISLAUS COUNTY:

CUPA STANISLAUS: CUPA Facility List
Cupa facility list

Date of Government Version: 02/08/2022
Date Data Arrived at EDR: 02/10/2022
Date Made Active in Reports: 05/04/2022
Number of Days to Update: 83

Source: Stanislaus County Department of Ennvironmental Protection
Telephone: 209-525-6751
Last EDR Contact: 10/04/2022
Next Scheduled EDR Contact: 01/23/2023
Data Release Frequency: Varies

SUTTER COUNTY:

UST SUTTER: Underground Storage Tanks
Underground storage tank sites located in Sutter county.

Date of Government Version: 08/03/2022
Date Data Arrived at EDR: 08/25/2022
Date Made Active in Reports: 11/14/2022
Number of Days to Update: 81

Source: Sutter County Environmental Health Services
Telephone: 530-822-7500
Last EDR Contact: 11/23/2022
Next Scheduled EDR Contact: 03/13/2023
Data Release Frequency: Semi-Annually

TEHAMA COUNTY:

CUPA TEHAMA: CUPA Facility List
Cupa facilities

Date of Government Version: 07/27/2022
Date Data Arrived at EDR: 07/27/2022
Date Made Active in Reports: 10/11/2022
Number of Days to Update: 76

Source: Tehama County Department of Environmental Health
Telephone: 530-527-8020
Last EDR Contact: 11/08/2022
Next Scheduled EDR Contact: 02/16/2023
Data Release Frequency: Varies

TRINITY COUNTY:

CUPA TRINITY: CUPA Facility List
Cupa facility list

Date of Government Version: 10/11/2022
Date Data Arrived at EDR: 10/12/2022
Date Made Active in Reports: 12/29/2022
Number of Days to Update: 78

Source: Department of Toxic Substances Control
Telephone: 760-352-0381
Last EDR Contact: 10/11/2022
Next Scheduled EDR Contact: 01/30/2023
Data Release Frequency: Varies

TULARE COUNTY:

CUPA TULARE: CUPA Facility List
Cupa program facilities

Date of Government Version: 10/07/2022
Date Data Arrived at EDR: 10/07/2022
Date Made Active in Reports: 12/21/2022
Number of Days to Update: 75

Source: Tulare County Environmental Health Services Division
Telephone: 559-624-7400
Last EDR Contact: 10/05/2022
Next Scheduled EDR Contact: 02/16/2023
Data Release Frequency: Varies

TUOLUMNE COUNTY:

CUPA TUOLUMNE: CUPA Facility List
Cupa facility list

Date of Government Version: 04/23/2018
Date Data Arrived at EDR: 04/25/2018
Date Made Active in Reports: 06/25/2018
Number of Days to Update: 61

Source: Divison of Environmental Health
Telephone: 209-533-5633
Last EDR Contact: 10/11/2022
Next Scheduled EDR Contact: 01/30/2023
Data Release Frequency: Varies

VENTURA COUNTY:

BWT VENTURA: Business Plan, Hazardous Waste Producers, and Operating Underground Tanks
The BWT list indicates by site address whether the Environmental Health Division has Business Plan (B), Waste Producer (W), and/or Underground Tank (T) information.

Date of Government Version: 05/26/2022
Date Data Arrived at EDR: 07/21/2022
Date Made Active in Reports: 09/30/2022
Number of Days to Update: 71

Source: Ventura County Environmental Health Division
Telephone: 805-654-2813
Last EDR Contact: 10/17/2022
Next Scheduled EDR Contact: 01/30/2023
Data Release Frequency: Quarterly

LF VENTURA: Inventory of Illegal Abandoned and Inactive Sites
Ventura County Inventory of Closed, Illegal Abandoned, and Inactive Sites.

Date of Government Version: 12/01/2011
Date Data Arrived at EDR: 12/01/2011
Date Made Active in Reports: 01/19/2012
Number of Days to Update: 49

Source: Environmental Health Division
Telephone: 805-654-2813
Last EDR Contact: 12/19/2022
Next Scheduled EDR Contact: 04/10/2023
Data Release Frequency: No Update Planned

LUST VENTURA: Listing of Underground Tank Cleanup Sites
Ventura County Underground Storage Tank Cleanup Sites (LUST).

Date of Government Version: 05/29/2008
Date Data Arrived at EDR: 06/24/2008
Date Made Active in Reports: 07/31/2008
Number of Days to Update: 37

Source: Environmental Health Division
Telephone: 805-654-2813
Last EDR Contact: 11/01/2022
Next Scheduled EDR Contact: 02/20/2023
Data Release Frequency: No Update Planned

MED WASTE VENTURA: Medical Waste Program List
To protect public health and safety and the environment from potential exposure to disease causing agents, the Environmental Health Division Medical Waste Program regulates the generation, handling, storage, treatment and disposal of medical waste throughout the County.

Date of Government Version: 05/26/2022
Date Data Arrived at EDR: 07/25/2022
Date Made Active in Reports: 10/05/2022
Number of Days to Update: 72

Source: Ventura County Resource Management Agency
Telephone: 805-654-2813
Last EDR Contact: 10/17/2022
Next Scheduled EDR Contact: 01/30/2023
Data Release Frequency: Quarterly

UST VENTURA: Underground Tank Closed Sites List
Ventura County Operating Underground Storage Tank Sites (UST)/Underground Tank Closed Sites List.

Date of Government Version: 08/29/2022
Date Data Arrived at EDR: 08/31/2022
Date Made Active in Reports: 11/21/2022
Number of Days to Update: 82

Source: Environmental Health Division
Telephone: 805-654-2813
Last EDR Contact: 12/02/2022
Next Scheduled EDR Contact: 03/20/2023
Data Release Frequency: Quarterly

YOLO COUNTY:

UST YOLO: Underground Storage Tank Comprehensive Facility Report
Underground storage tank sites located in Yolo county.

Date of Government Version: 09/21/2022
Date Data Arrived at EDR: 09/30/2022
Date Made Active in Reports: 12/14/2022
Number of Days to Update: 75

Source: Yolo County Department of Health
Telephone: 530-666-8646
Last EDR Contact: 12/19/2022
Next Scheduled EDR Contact: 04/10/2023
Data Release Frequency: Annually

YUBA COUNTY:

CUPA YUBA: CUPA Facility List
CUPA facility listing for Yuba County.

Date of Government Version: 10/25/2022
Date Data Arrived at EDR: 10/26/2022
Date Made Active in Reports: 10/31/2022
Number of Days to Update: 5

Source: Yuba County Environmental Health Department
Telephone: 530-749-7523
Last EDR Contact: 10/20/2022
Next Scheduled EDR Contact: 02/06/2023
Data Release Frequency: Varies

OTHER DATABASE(S)

Depending on the geographic area covered by this report, the data provided in these specialty databases may or may not be complete. For example, the existence of wetlands information data in a specific report does not mean that all wetlands in the area covered by the report are included. Moreover, the absence of any reported wetlands information does not necessarily mean that wetlands do not exist in the area covered by the report.

CT MANIFEST: Hazardous Waste Manifest Data
Facility and manifest data. Manifest is a document that lists and tracks hazardous waste from the generator through transporters to a tsd facility.

Date of Government Version: 08/08/2022
Date Data Arrived at EDR: 08/08/2022
Date Made Active in Reports: 10/21/2022
Number of Days to Update: 74

Source: Department of Energy & Environmental Protection
Telephone: 860-424-3375
Last EDR Contact: 11/16/2022
Next Scheduled EDR Contact: 02/20/2023
Data Release Frequency: No Update Planned

NJ MANIFEST: Manifest Information
Hazardous waste manifest information.

Date of Government Version: 12/31/2018
Date Data Arrived at EDR: 04/10/2019
Date Made Active in Reports: 05/16/2019
Number of Days to Update: 36

Source: Department of Environmental Protection
Telephone: N/A
Last EDR Contact: 12/28/2022
Next Scheduled EDR Contact: 04/17/2023
Data Release Frequency: Annually

NY MANIFEST: Facility and Manifest Data

Manifest is a document that lists and tracks hazardous waste from the generator through transporters to a TSD facility.

Date of Government Version: 01/01/2019
Date Data Arrived at EDR: 10/29/2021
Date Made Active in Reports: 01/19/2022
Number of Days to Update: 82

Source: Department of Environmental Conservation
Telephone: 518-402-8651
Last EDR Contact: 10/28/2022
Next Scheduled EDR Contact: 02/06/2023
Data Release Frequency: Quarterly

PA MANIFEST: Manifest Information

Hazardous waste manifest information.

Date of Government Version: 06/30/2018
Date Data Arrived at EDR: 07/19/2019
Date Made Active in Reports: 09/10/2019
Number of Days to Update: 53

Source: Department of Environmental Protection
Telephone: 717-783-8990
Last EDR Contact: 10/05/2022
Next Scheduled EDR Contact: 01/23/2023
Data Release Frequency: Annually

RI MANIFEST: Manifest information

Hazardous waste manifest information

Date of Government Version: 12/31/2020
Date Data Arrived at EDR: 11/30/2021
Date Made Active in Reports: 02/18/2022
Number of Days to Update: 80

Source: Department of Environmental Management
Telephone: 401-222-2797
Last EDR Contact: 12/20/2022
Next Scheduled EDR Contact: 02/27/2023
Data Release Frequency: Annually

WI MANIFEST: Manifest Information

Hazardous waste manifest information.

Date of Government Version: 05/31/2018
Date Data Arrived at EDR: 06/19/2019
Date Made Active in Reports: 09/03/2019
Number of Days to Update: 76

Source: Department of Natural Resources
Telephone: N/A
Last EDR Contact: 12/01/2022
Next Scheduled EDR Contact: 03/20/2023
Data Release Frequency: Annually

Oil/Gas Pipelines

Source: Endeavor Business Media

Petroleum Bundle (Crude Oil, Refined Products, Petrochemicals, Gas Liquids (LPG/NGL), and Specialty Gases (Miscellaneous)) N = Natural Gas Bundle (Natural Gas, Gas Liquids (LPG/NGL), and Specialty Gases (Miscellaneous)). This map includes information copyrighted by Endeavor Business Media. This information is provided on a best effort basis and Endeavor Business Media does not guarantee its accuracy nor warrant its fitness for any particular purpose. Such information has been reprinted with the permission of Endeavor Business Media.

Electric Power Transmission Line Data

Source: Endeavor Business Media

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Sensitive Receptors: There are individuals deemed sensitive receptors due to their fragile immune systems and special sensitivity to environmental discharges. These sensitive receptors typically include the elderly, the sick, and children. While the location of all sensitive receptors cannot be determined, EDR indicates those buildings and facilities - schools, daycares, hospitals, medical centers, and nursing homes - where individuals who are sensitive receptors are likely to be located.

AHA Hospitals:

Source: American Hospital Association, Inc.
Telephone: 312-280-5991

The database includes a listing of hospitals based on the American Hospital Association's annual survey of hospitals.

Medical Centers: Provider of Services Listing

Source: Centers for Medicare & Medicaid Services
Telephone: 410-786-3000

A listing of hospitals with Medicare provider number, produced by Centers of Medicare & Medicaid Services, a federal agency within the U.S. Department of Health and Human Services.

Nursing Homes
Source: National Institutes of Health
Telephone: 301-594-6248
Information on Medicare and Medicaid certified nursing homes in the United States.
Public Schools
Source: National Center for Education Statistics
Telephone: 202-502-7300
The National Center for Education Statistics' primary database on elementary and secondary public education in the United States. It is a comprehensive, annual, national statistical database of all public elementary and secondary schools and school districts, which contains data that are comparable across all states.
Private Schools
Source: National Center for Education Statistics
Telephone: 202-502-7300
The National Center for Education Statistics' primary database on private school locations in the United States.
Daycare Centers: Licensed Facilities
Source: Department of Social Services
Telephone: 916-657-4041

Flood Zone Data: This data was obtained from the Federal Emergency Management Agency (FEMA). It depicts 100-year and 500-year flood zones as defined by FEMA. It includes the National Flood Hazard Layer (NFHL) which incorporates Flood Insurance Rate Map (FIRM) data and Q3 data from FEMA in areas not covered by NFHL.
Source: FEMA
Telephone: 877-336-2627
Date of Government Version: 2003, 2015

NWI: National Wetlands Inventory. This data, available in select counties across the country, was obtained by EDR in 2002, 2005, 2010 and 2015 from the U.S. Fish and Wildlife Service.

State Wetlands Data: Wetland Inventory
Source: Department of Fish and Wildlife
Telephone: 916-445-0411

Current USGS 7.5 Minute Topographic Map
Source: U.S. Geological Survey

STREET AND ADDRESS INFORMATION

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GEOCHECK ®- PHYSICAL SETTING SOURCE ADDENDUM

TARGET PROPERTY ADDRESS

COMMERCIAL PROPERTY
825 DRAKE AVENUE
SAUSALITO, CA 94965

TARGET PROPERTY COORDINATES

Latitude (North):	37.874502 - 37ˆ 52’ 28.21’’
Longitude (West):	122.513943 - 122ˆ 30’ 50.19’’
Universal Tranverse Mercator:	Zone 10
UTM X (Meters):	542748.3
UTM Y (Meters):	4191796.8
Elevation:	56 ft. above sea level

USGS TOPOGRAPHIC MAP

Target Property Map:	12016473 POINT BONITA, CA
Version Date:	2018
Northeast Map:	12016489 SAN QUENTIN, CA
Version Date:	2018
Southeast Map:	12016479 SAN FRANCISCO NORTH, CA
Version Date:	2018
Northwest Map:	12016491 SAN RAFAEL, CA
Version Date:	2018

EDR’s GeoCheck Physical Setting Source Addendum is provided to assist the environmental professional in forming an opinion about the impact of potential contaminant migration.

Assessment of the impact of contaminant migration generally has two principle investigative components:

1. Groundwater flow direction, and
2. Groundwater flow velocity.

Groundwater flow direction may be impacted by surface topography, hydrology, hydrogeology, characteristics of the soil, and nearby wells. Groundwater flow velocity is generally impacted by the nature of the geologic strata.

GEOCHECK® - PHYSICAL SETTING SOURCE SUMMARY

GROUNDWATER FLOW DIRECTION INFORMATION

Groundwater flow direction for a particular site is best determined by a qualified environmental professional using site-specific well data. If such data is not reasonably ascertainable, it may be necessary to rely on other sources of information, such as surface topographic information, hydrologic information, hydrogeologic data collected on nearby properties, and regional groundwater flow information (from deep aquifers).

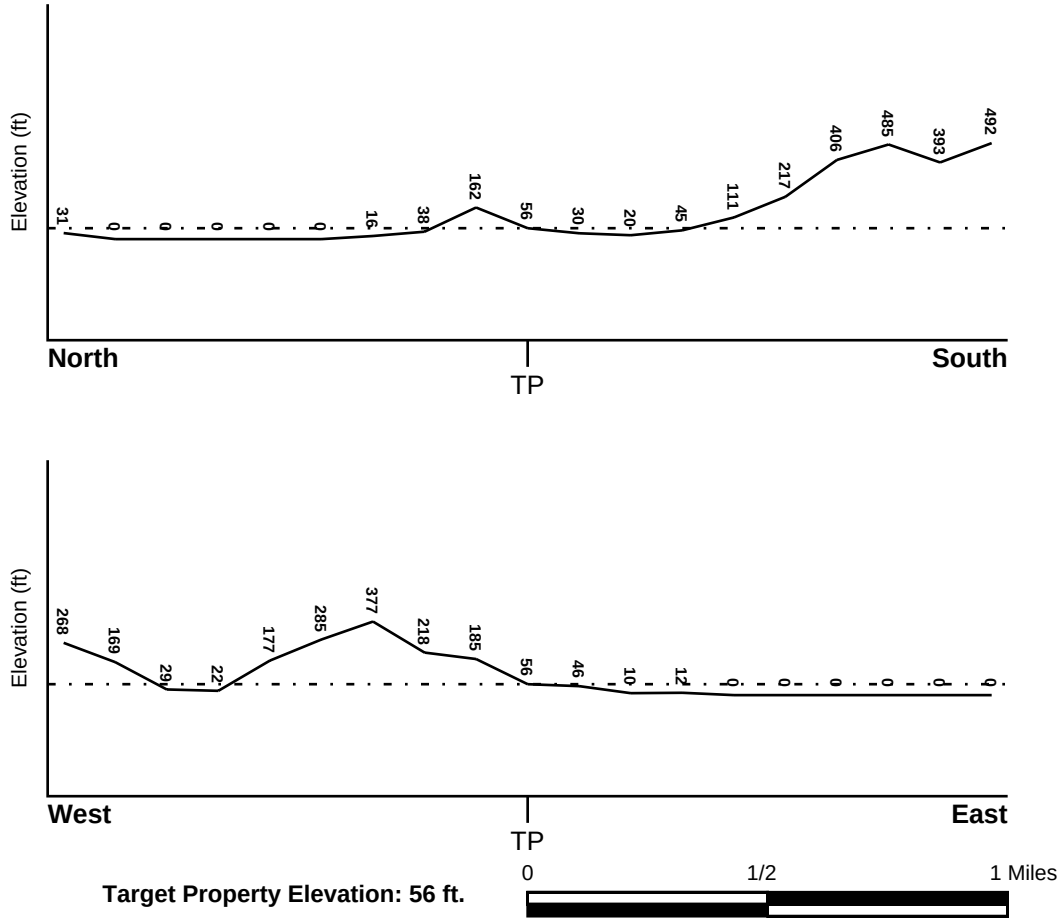
TOPOGRAPHIC INFORMATION

Surface topography may be indicative of the direction of surficial groundwater flow. This information can be used to assist the environmental professional in forming an opinion about the impact of nearby contaminated properties or, should contamination exist on the target property, what downgradient sites might be impacted.

TARGET PROPERTY TOPOGRAPHY

General Topographic Gradient: General East

SURROUNDING TOPOGRAPHY: ELEVATION PROFILES



Target Property Elevation: 56 ft.

Source: Topography has been determined from the USGS 7.5' Digital Elevation Model and should be evaluated on a relative (not an absolute) basis. Relative elevation information between sites of close proximity should be field verified.

GEOCHECK® - PHYSICAL SETTING SOURCE SUMMARY

HYDROLOGIC INFORMATION

Surface water can act as a hydrologic barrier to groundwater flow. Such hydrologic information can be used to assist the environmental professional in forming an opinion about the impact of nearby contaminated properties or, should contamination exist on the target property, what downgradient sites might be impacted.

Refer to the Physical Setting Source Map following this summary for hydrologic information (major waterways and bodies of water).

FEMA FLOOD ZONE

Flood Plain Panel at Target Property	FEMA Source Type
06041C0507D	FEMA FIRM Flood data

Additional Panels in search area:	FEMA Source Type
06041C0468E	FEMA FIRM Flood data
06041C0469E	FEMA FIRM Flood data
06041C0488D	FEMA FIRM Flood data
06041C0510D	FEMA FIRM Flood data
06041C0526D	FEMA FIRM Flood data

NATIONAL WETLAND INVENTORY

NWI Quad at Target Property	NWI Electronic Data Coverage
POINT BONITA	YES - refer to the Overview Map and Detail Map

HYDROGEOLOGIC INFORMATION

Hydrogeologic information obtained by installation of wells on a specific site can often be an indicator of groundwater flow direction in the immediate area. Such hydrogeologic information can be used to assist the environmental professional in forming an opinion about the impact of nearby contaminated properties or, should contamination exist on the target property, what downgradient sites might be impacted.

Site-Specific Hydrogeological Data*:

Search Radius:	1.25 miles
Status:	Not found

AQUIFLOW®

Search Radius: 1.000 Mile.

EDR has developed the AQUIFLOW Information System to provide data on the general direction of groundwater flow at specific points. EDR has reviewed reports submitted by environmental professionals to regulatory authorities at select sites and has extracted the date of the report, groundwater flow direction as determined hydrogeologically, and the depth to water table.

MAP ID	LOCATION FROM TP	GENERAL DIRECTION GROUNDWATER FLOW
4	1/4 - 1/2 Mile NW	Varies
5	1/2 - 1 Mile NW	NE and SW
C20	1/2 - 1 Mile NW	W
D32	1/2 - 1 Mile North	Varies

* ©1996 Site−specific hydrogeological data gathered by CERCLIS Alerts, Inc., Bainbridge Island, WA. All rights reserved. All of the information and opinions presented are those of the cited EPA report(s), which were completed under a Comprehensive Environmental Response Compensation and Liability Information System (CERCLIS) investigation.

GEOCHECK® - PHYSICAL SETTING SOURCE SUMMARY

MAP ID	LOCATION FROM TP	GENERAL DIRECTION GROUNDWATER FLOW
1G	1/2 - 1 Mile North	Varies
2G	1/2 - 1 Mile NW	W
3G	1/2 - 1 Mile NW	NE and SW
4G	1/4 - 1/2 Mile NW	Varies

For additional site information, refer to Physical Setting Source Map Findings.

GEOCHECK® - PHYSICAL SETTING SOURCE SUMMARY

GROUNDWATER FLOW VELOCITY INFORMATION

Groundwater flow velocity information for a particular site is best determined by a qualified environmental professional using site specific geologic and soil strata data. If such data are not reasonably ascertainable, it may be necessary to rely on other sources of information, including geologic age identification, rock stratigraphic unit and soil characteristics data collected on nearby properties and regional soil information. In general, contaminant plumes move more quickly through sandy-gravelly types of soils than silty-clayey types of soils.

GEOLOGIC INFORMATION IN GENERAL AREA OF TARGET PROPERTY

Geologic information can be used by the environmental professional in forming an opinion about the relative speed at which contaminant migration may be occurring.

ROCK STRATIGRAPHIC UNIT

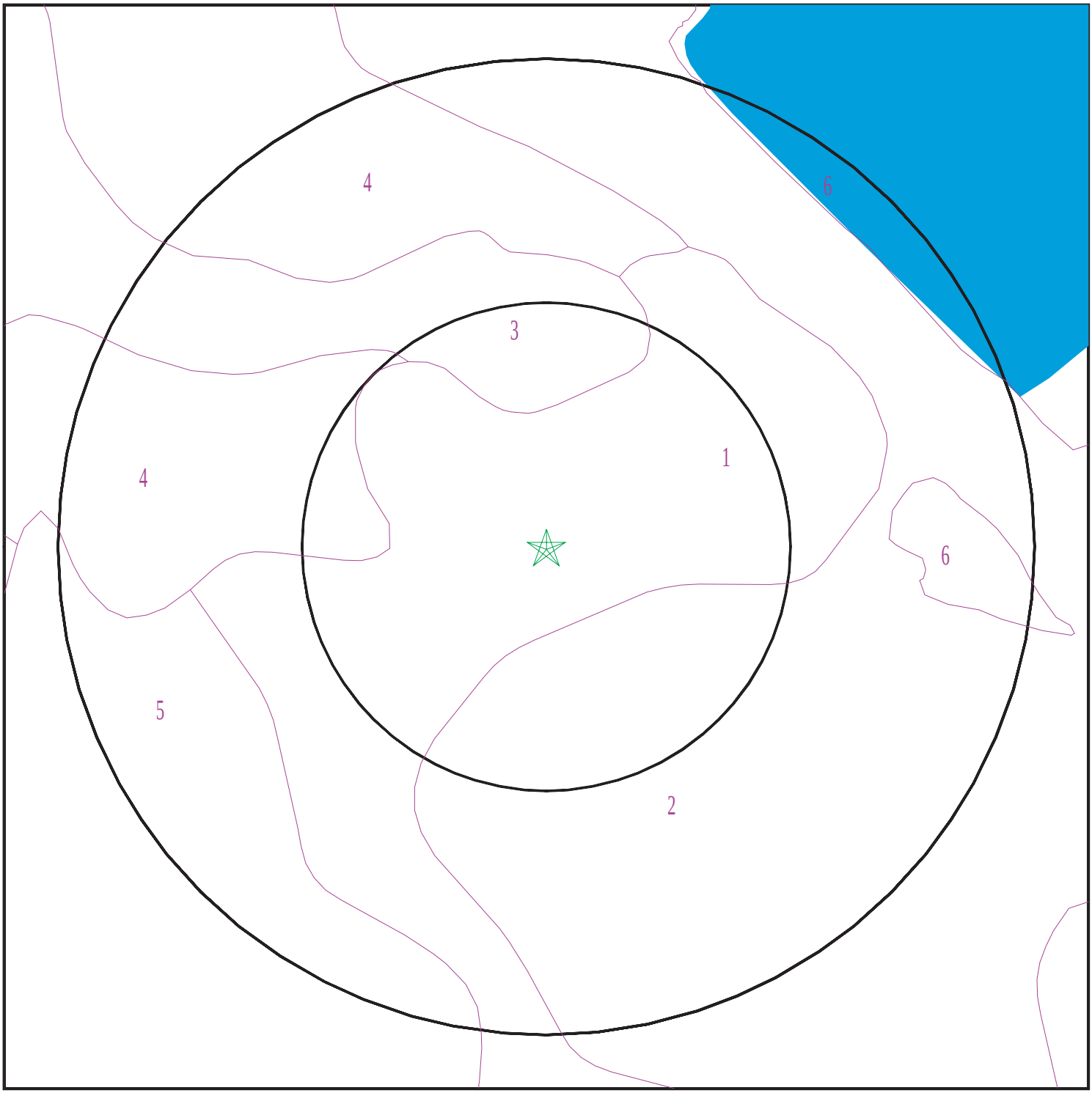
Era:	Cenozoic
System:	Tertiary
Series:	Pliocene
Code:	Tp *(decoded above as Era, System & Series)*

GEOLOGIC AGE IDENTIFICATION

Category: Stratified Sequence

Geologic Age and Rock Stratigraphic Unit Source: P.G. Schruben, R.E. Arndt and W.J. Bawiec, Geology of the Conterminous U.S. at 1:2,500,000 Scale - a digital representation of the 1974 P.B. King and H.M. Beikman Map, USGS Digital Data Series DDS - 11 (1994).

SSURGO SOIL MAP - 7216358.2s



SITE NAME:	Commercial Property	CLIENT:	KCE Matrix
ADDRESS:	825 Drake Avenue Sausalito CA 94965	CONTACT:	Aram Kaloustian
		INQUIRY #:	7216358.2s
LAT/LONG:	37.874502 / 122.513943	DATE:	January 03, 2023 7:22 pm

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GEOCHECK® - PHYSICAL SETTING SOURCE SUMMARY

DOMINANT SOIL COMPOSITION IN GENERAL AREA OF TARGET PROPERTY

The U.S. Department of Agriculture's (USDA) Soil Conservation Service (SCS) leads the National Cooperative Soil Survey (NCSS) and is responsible for collecting, storing, maintaining and distributing soil survey information for privately owned lands in the United States. A soil map in a soil survey is a representation of soil patterns in a landscape. The following information is based on Soil Conservation Service SSURGO data.

Soil Map ID: 1

Soil Component Name: SAURIN

Soil Surface Texture: clay loam

Hydrologic Group: Not reported

Soil Drainage Class:
Hydric Status: Not hydric

Corrosion Potential - Uncoated Steel: Moderate

Depth to Bedrock Min: > 0 inches

Depth to Watertable Min: > 0 inches

Soil Layer Information							
	Boundary			Classification		Saturated hydraulic conductivity micro m/sec	Soil Reaction (pH)
Layer	Upper	Lower	Soil Texture Class	AASHTO Group	Unified Soil		
1	0 inches	9 inches	clay loam	Silt-Clay Materials (more than 35 pct. passing No. 200), Clayey Soils.	Not reported	Max: Min:	Max: Min:
2	9 inches	33 inches	clay loam	Silt-Clay Materials (more than 35 pct. passing No. 200), Clayey Soils.	Not reported	Max: Min:	Max: Min:
3	33 inches	37 inches	weathered bedrock	Silt-Clay Materials (more than 35 pct. passing No. 200), Clayey Soils.	Not reported	Max: Min:	Max: Min:

Soil Map ID: 2

Soil Component Name: XERORTHENTS

Soil Surface Texture: clay loam

Hydrologic Group: Not reported

Soil Drainage Class:
Hydric Status: Not hydric

Corrosion Potential - Uncoated Steel: Not Reported

Depth to Bedrock Min: > 0 inches

Depth to Watertable Min: > 0 inches

No Layer Information available.

Soil Map ID: 3

Soil Component Name: TAMALPAIS

Soil Surface Texture: very gravelly loam

Hydrologic Group: Class C - Slow infiltration rates. Soils with layers impeding downward movement of water, or soils with moderately fine or fine textures.

Soil Drainage Class: Well drained

Hydric Status: Not hydric

Corrosion Potential - Uncoated Steel: Moderate

Depth to Bedrock Min: > 33 inches

Depth to Watertable Min: > 0 inches

Soil Layer Information							
	Boundary			Classification		Saturated hydraulic conductivity micro m/sec	Soil Reaction (pH)
Layer	Upper	Lower	Soil Texture Class	AASHTO Group	Unified Soil		
1	0 inches	18 inches	very gravelly loam	Granular materials (35 pct. or less passing No. 200), Silty, or Clayey Gravel and Sand.	Not reported	Max: Min:	Max: Min:

Soil Layer Information							
	Boundary			Classification		Saturated hydraulic conductivity micro m/sec	Soil Reaction (pH)
Layer	Upper	Lower	Soil Texture Class	AASHTO Group	Unified Soil		
2	18 inches	38 inches	very gravelly clay loam	Granular materials (35 pct. or less passing No. 200), Silty, or Clayey Gravel and Sand.	Not reported	Max: Min:	Max: Min:
3	38 inches	42 inches	unweathered bedrock	Granular materials (35 pct. or less passing No. 200), Silty, or Clayey Gravel and Sand.	Not reported	Max: Min:	Max: Min:

Soil Map ID: 4

Soil Component Name: TAMALPAIS

Soil Surface Texture: very gravelly loam

Hydrologic Group: Class C - Slow infiltration rates. Soils with layers impeding downward movement of water, or soils with moderately fine or fine textures.

Soil Drainage Class: Well drained

Hydric Status: Not hydric

Corrosion Potential - Uncoated Steel: Moderate

Depth to Bedrock Min: > 33 inches

Depth to Watertable Min: > 0 inches

Soil Layer Information							
	Boundary			Classification		Saturated hydraulic conductivity micro m/sec	Soil Reaction (pH)
Layer	Upper	Lower	Soil Texture Class	AASHTO Group	Unified Soil		
1	0 inches	18 inches	very gravelly loam	Granular materials (35 pct. or less passing No. 200), Silty, or Clayey Gravel and Sand.	Not reported	Max: Min:	Max: Min:

Soil Layer Information							
	Boundary			Classification		Saturated hydraulic conductivity micro m/sec	Soil Reaction (pH)
Layer	Upper	Lower	Soil Texture Class	AASHTO Group	Unified Soil		
2	18 inches	38 inches	very gravelly clay loam	Granular materials (35 pct. or less passing No. 200), Silty, or Clayey Gravel and Sand.	Not reported	Max: Min:	Max: Min:
3	38 inches	42 inches	unweathered bedrock	Granular materials (35 pct. or less passing No. 200), Silty, or Clayey Gravel and Sand.	Not reported	Max: Min:	Max: Min:

Soil Map ID: 5

Soil Component Name: TOCALOMA

Soil Surface Texture: loam

Hydrologic Group: Class C - Slow infiltration rates. Soils with layers impeding downward movement of water, or soils with moderately fine or fine textures.

Soil Drainage Class: Well drained

Hydric Status: Not hydric

Corrosion Potential - Uncoated Steel: Moderate

Depth to Bedrock Min: > 46 inches

Depth to Watertable Min: > 0 inches

Soil Layer Information							
	Boundary			Classification		Saturated hydraulic conductivity micro m/sec	Soil Reaction (pH)
Layer	Upper	Lower	Soil Texture Class	AASHTO Group	Unified Soil		
1	0 inches	18 inches	loam	Silt-Clay Materials (more than 35 pct. passing No. 200), Silty Soils.	Not reported	Max: Min:	Max: Min:

GEOCHECK® - PHYSICAL SETTING SOURCE SUMMARY

Soil Layer Information							
	Boundary			Classification		Saturated hydraulic conductivity micro m/sec	Soil Reaction (pH)
Layer	Upper	Lower	Soil Texture Class	AASHTO Group	Unified Soil		
2	18 inches	38 inches	very gravelly loam	Silt-Clay Materials (more than 35 pct. passing No. 200), Silty Soils.	Not reported	Max: Min:	Max: Min:
3	38 inches	42 inches	weathered bedrock	Silt-Clay Materials (more than 35 pct. passing No. 200), Silty Soils.	Not reported	Max: Min:	Max: Min:

Soil Map ID: 6

Soil Component Name: Water

Soil Surface Texture: loam

Hydrologic Group: Class C - Slow infiltration rates. Soils with layers impeding downward movement of water, or soils with moderately fine or fine textures.

Soil Drainage Class:
Hydric Status: Not hydric

Corrosion Potential - Uncoated Steel: Not Reported

Depth to Bedrock Min: > 0 inches

Depth to Watertable Min: > 0 inches

No Layer Information available.

LOCAL / REGIONAL WATER AGENCY RECORDS

EDR Local/Regional Water Agency records provide water well information to assist the environmental professional in assessing sources that may impact ground water flow direction, and in forming an opinion about the impact of contaminant migration on nearby drinking water wells.

GEOCHECK® - PHYSICAL SETTING SOURCE SUMMARY

WELL SEARCH DISTANCE INFORMATION

DATABASE	SEARCH DISTANCE (miles)
Federal USGS	1.000
Federal FRDS PWS	Nearest PWS within 1 mile
State Database	1.000

FEDERAL USGS WELL INFORMATION

MAP ID	WELL ID	LOCATION FROM TP
No Wells Found		

FEDERAL FRDS PUBLIC WATER SUPPLY SYSTEM INFORMATION

MAP ID	WELL ID	LOCATION FROM TP
No PWS System Found		

Note: PWS System location is not always the same as well location.

STATE DATABASE WELL INFORMATION

MAP ID	WELL ID	LOCATION FROM TP
A1	CAEDF0000005890	1/8 - 1/4 Mile SE
A2	CAEDF0000048337	1/8 - 1/4 Mile ESE
A3	CAEDF0000086842	1/8 - 1/4 Mile ESE
B6	CAEDF0000020506	1/2 - 1 Mile ESE
B7	CAEDF0000092191	1/2 - 1 Mile ESE
B8	CAEDF0000139729	1/2 - 1 Mile ESE
B9	CAEDF0000108330	1/2 - 1 Mile ESE
B10	CAEDF0000036147	1/2 - 1 Mile ESE
B11	CAEDF0000058778	1/2 - 1 Mile ESE
B12	CAEDF0000056853	1/2 - 1 Mile ESE
B13	CAEDF0000098338	1/2 - 1 Mile ESE
B14	CAEDF0000143752	1/2 - 1 Mile ESE
B15	CAEDF0000076070	1/2 - 1 Mile ESE
B16	CAEDF0000120178	1/2 - 1 Mile ESE
B17	CAEDF0000051928	1/2 - 1 Mile ESE
B18	CAEDF0000051615	1/2 - 1 Mile SE
C19	CAEDF0000102914	1/2 - 1 Mile NW
C21	CAEDF0000087839	1/2 - 1 Mile NW
C22	CAEDF0000023307	1/2 - 1 Mile NW
C23	CAEDF0000057563	1/2 - 1 Mile NW
C24	CAEDF0000085433	1/2 - 1 Mile NW
D25	CAEDF0000100888	1/2 - 1 Mile North
D26	CAEDF0000054716	1/2 - 1 Mile North
D27	CAEDF0000090109	1/2 - 1 Mile North
D28	CAEDF0000074813	1/2 - 1 Mile North

GEOCHECK® - PHYSICAL SETTING SOURCE SUMMARY

STATE DATABASE WELL INFORMATION

MAP ID	WELL ID	LOCATION FROM TP
D29	CAEDF0000036424	1/2 - 1 Mile North
D30	CAEDF0000067841	1/2 - 1 Mile North
D31	CAEDF0000066441	1/2 - 1 Mile North
D33	CAEDF0000045502	1/2 - 1 Mile North

PHYSICAL SETTING SOURCE MAP - 7216358.2s

County Boundary
Major Roads
Contour Lines
Earthquake Fault Lines
Airports
Earthquake epicenter, Richter 5 or greater
Water Wells
Public Water Supply Wells
Cluster of Multiple Icons

0 1/4 1/2 1 Miles

Groundwater Flow Direction
Indeterminate Groundwater Flow at Location
Groundwater Flow Varies at Location
Closest Hydrogeological Data
Oil, gas or related wells

SITE NAME: Commercial Property	CLIENT: KCE Matrix
ADDRESS: 825 Drake Avenue Sausalito CA 94965	CONTACT: Aram Kaloustian INQUIRY #: 7216358.2s
LAT/LONG: 37.874502 / 122.513943	DATE: January 03, 2023 7:22 pm

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GEOCHECK® - PHYSICAL SETTING SOURCE MAP FINDINGS

Map ID
Direction
Distance
Elevation

	Database	EDR ID Number
A1 **SE** **1/8 - 1/4 Mile** **Lower**	**CA WELLS**	**CAEDF0000005890**

Well ID:	SL0604181210-MW-1	Well Type:	MONITORING
Source:	EDF	Other Name:	MW-1
GAMA PFAS Testing:	Not Reported		
Groundwater Quality Data:	https://gamagroundwater.waterboards.ca.gov/gama/gamamap/public/GamaDataDisplay.asp?dataset=EDF&samp_date=&global_id=SL0604181210&assigned_name=MW-1&store_num=		
GeoTracker Data:	https://geotracker.waterboards.ca.gov/profile_report.asp?cmd=MWEDFResults&global_id=SL0604181210&assigned_name=MW-1		

	Database	EDR ID Number
A2 **ESE** **1/8 - 1/4 Mile** **Lower**	**CA WELLS**	**CAEDF0000048337**

Well ID:	SL0604181210-MW-2	Well Type:	MONITORING
Source:	EDF	Other Name:	MW-2
GAMA PFAS Testing:	Not Reported		
Groundwater Quality Data:	https://gamagroundwater.waterboards.ca.gov/gama/gamamap/public/GamaDataDisplay.asp?dataset=EDF&samp_date=&global_id=SL0604181210&assigned_name=MW-2&store_num=		
GeoTracker Data:	https://geotracker.waterboards.ca.gov/profile_report.asp?cmd=MWEDFResults&global_id=SL0604181210&assigned_name=MW-2		

	Database	EDR ID Number
A3 **ESE** **1/8 - 1/4 Mile** **Lower**	**CA WELLS**	**CAEDF0000086842**

Well ID:	SL0604181210-MW-3	Well Type:	MONITORING
Source:	EDF	Other Name:	MW-3
GAMA PFAS Testing:	Not Reported		
Groundwater Quality Data:	https://gamagroundwater.waterboards.ca.gov/gama/gamamap/public/GamaDataDisplay.asp?dataset=EDF&samp_date=&global_id=SL0604181210&assigned_name=MW-3&store_num=		
GeoTracker Data:	https://geotracker.waterboards.ca.gov/profile_report.asp?cmd=MWEDFResults&global_id=SL0604181210&assigned_name=MW-3		

			Database	EDR ID Number
4 **NW** **1/4 - 1/2 Mile** **Higher**	Site ID:	21-0314	**AQUIFLOW**	**39221**
	Groundwater Flow:	Varies		
	Shallow Water Depth:	1.79		
	Deep Water Depth:	3.10		
	Average Water Depth:	Not Reported		
	Date:	06/05/1998		

			Database	EDR ID Number
5 **NW** **1/2 - 1 Mile** **Higher**	Site ID:	21-0044	**AQUIFLOW**	**39062**
	Groundwater Flow:	NE and SW		
	Shallow Water Depth:	1.99		
	Deep Water Depth:	7.43		
	Average Water Depth:	Not Reported		
	Date:	11/20/1996		

GEOCHECK® - PHYSICAL SETTING SOURCE MAP FINDINGS

Map ID
Direction
Distance
Elevation | Database | EDR ID Number

B6
ESE
1/2 - 1 Mile
Lower

CA WELLS **CAEDF0000020506**

Well ID:	T0604100120-S-15	Well Type:	MONITORING
Source:	EDF	Other Name:	S-15
GAMA PFAS Testing:	Not Reported		
Groundwater Quality Data:	https://gamagroundwater.waterboards.ca.gov/gama/gamamap/public/GamaDataDisplay.asp?dataset=EDF&samp_date=&global_id=T0604100120&assigned_name=S-15&store_num=		
GeoTracker Data:	https://geotracker.waterboards.ca.gov/profile_report.asp?cmd=MWEDFResults&global_id=T0604100120&assigned_name=S-15		

B7
ESE
1/2 - 1 Mile
Lower

CA WELLS **CAEDF0000092191**

Well ID:	T0604100120-S-18	Well Type:	MONITORING
Source:	EDF	Other Name:	S-18
GAMA PFAS Testing:	Not Reported		
Groundwater Quality Data:	https://gamagroundwater.waterboards.ca.gov/gama/gamamap/public/GamaDataDisplay.asp?dataset=EDF&samp_date=&global_id=T0604100120&assigned_name=S-18&store_num=		
GeoTracker Data:	https://geotracker.waterboards.ca.gov/profile_report.asp?cmd=MWEDFResults&global_id=T0604100120&assigned_name=S-18		

B8
ESE
1/2 - 1 Mile
Lower

CA WELLS **CAEDF0000139729**

Well ID:	T0604100120-S-8	Well Type:	MONITORING
Source:	EDF	Other Name:	S-8
GAMA PFAS Testing:	Not Reported		
Groundwater Quality Data:	https://gamagroundwater.waterboards.ca.gov/gama/gamamap/public/GamaDataDisplay.asp?dataset=EDF&samp_date=&global_id=T0604100120&assigned_name=S-8&store_num=		
GeoTracker Data:	https://geotracker.waterboards.ca.gov/profile_report.asp?cmd=MWEDFResults&global_id=T0604100120&assigned_name=S-8		

B9
ESE
1/2 - 1 Mile
Lower

CA WELLS **CAEDF0000108330**

Well ID:	T0604100120-S-7	Well Type:	MONITORING
Source:	EDF	Other Name:	S-7
GAMA PFAS Testing:	Not Reported		
Groundwater Quality Data:	https://gamagroundwater.waterboards.ca.gov/gama/gamamap/public/GamaDataDisplay.asp?dataset=EDF&samp_date=&global_id=T0604100120&assigned_name=S-7&store_num=		
GeoTracker Data:	https://geotracker.waterboards.ca.gov/profile_report.asp?cmd=MWEDFResults&global_id=T0604100120&assigned_name=S-7		

Map ID
Direction
Distance
Elevation | Database | EDR ID Number

B10
ESE
1/2 - 1 Mile
Lower

CA WELLS **CAEDF0000036147**

Well ID:	T0604100120-S-10	Well Type:	MONITORING
Source:	EDF	Other Name:	S-10
GAMA PFAS Testing:	Not Reported		
Groundwater Quality Data:	https://gamagroundwater.waterboards.ca.gov/gama/gamamap/public/GamaDataDisplay.asp?dataset=EDF&samp_date=&global_id=T0604100120&assigned_name=S-10&store_num=		
GeoTracker Data:	https://geotracker.waterboards.ca.gov/profile_report.asp?cmd=MWEDFResults&global_id=T0604100120&assigned_name=S-10		

B11
ESE
1/2 - 1 Mile
Lower

CA WELLS **CAEDF0000058778**

Well ID:	T0604100120-S-19	Well Type:	MONITORING
Source:	EDF	Other Name:	S-19
GAMA PFAS Testing:	Not Reported		
Groundwater Quality Data:	https://gamagroundwater.waterboards.ca.gov/gama/gamamap/public/GamaDataDisplay.asp?dataset=EDF&samp_date=&global_id=T0604100120&assigned_name=S-19&store_num=		
GeoTracker Data:	https://geotracker.waterboards.ca.gov/profile_report.asp?cmd=MWEDFResults&global_id=T0604100120&assigned_name=S-19		

B12
ESE
1/2 - 1 Mile
Lower

CA WELLS **CAEDF0000056853**

Well ID:	T0604100120-S-6	Well Type:	MONITORING
Source:	EDF	Other Name:	S-6
GAMA PFAS Testing:	Not Reported		
Groundwater Quality Data:	https://gamagroundwater.waterboards.ca.gov/gama/gamamap/public/GamaDataDisplay.asp?dataset=EDF&samp_date=&global_id=T0604100120&assigned_name=S-6&store_num=		
GeoTracker Data:	https://geotracker.waterboards.ca.gov/profile_report.asp?cmd=MWEDFResults&global_id=T0604100120&assigned_name=S-6		

B13
ESE
1/2 - 1 Mile
Lower

CA WELLS **CAEDF0000098338**

Well ID:	T0604100120-S-9	Well Type:	MONITORING
Source:	EDF	Other Name:	S-9
GAMA PFAS Testing:	Not Reported		
Groundwater Quality Data:	https://gamagroundwater.waterboards.ca.gov/gama/gamamap/public/GamaDataDisplay.asp?dataset=EDF&samp_date=&global_id=T0604100120&assigned_name=S-9&store_num=		
GeoTracker Data:	https://geotracker.waterboards.ca.gov/profile_report.asp?cmd=MWEDFResults&global_id=T0604100120&assigned_name=S-9		

GEOCHECK® - PHYSICAL SETTING SOURCE MAP FINDINGS

Map ID
Direction
Distance
Elevation | Database | EDR ID Number

B14
ESE
1/2 - 1 Mile
Lower

CA WELLS **CAEDF0000143752**

Well ID:	T0604100120-S-3	Well Type:	MONITORING
Source:	EDF	Other Name:	S-3
GAMA PFAS Testing:	Not Reported		
Groundwater Quality Data:	https://gamagroundwater.waterboards.ca.gov/gama/gamamap/public/GamaDataDisplay.asp?dataset=EDF&samp_date=&global_id=T0604100120&assigned_name=S-3&store_num=		
GeoTracker Data:	https://geotracker.waterboards.ca.gov/profile_report.asp?cmd=MWEDFResults&global_id=T0604100120&assigned_name=S-3		

B15
ESE
1/2 - 1 Mile
Lower

CA WELLS **CAEDF0000076070**

Well ID:	T0604100120-S-17	Well Type:	MONITORING
Source:	EDF	Other Name:	S-17
GAMA PFAS Testing:	Not Reported		
Groundwater Quality Data:	https://gamagroundwater.waterboards.ca.gov/gama/gamamap/public/GamaDataDisplay.asp?dataset=EDF&samp_date=&global_id=T0604100120&assigned_name=S-17&store_num=		
GeoTracker Data:	https://geotracker.waterboards.ca.gov/profile_report.asp?cmd=MWEDFResults&global_id=T0604100120&assigned_name=S-17		

B16
ESE
1/2 - 1 Mile
Lower

CA WELLS **CAEDF0000120178**

Well ID:	T0604100120-S-13	Well Type:	MONITORING
Source:	EDF	Other Name:	S-13
GAMA PFAS Testing:	Not Reported		
Groundwater Quality Data:	https://gamagroundwater.waterboards.ca.gov/gama/gamamap/public/GamaDataDisplay.asp?dataset=EDF&samp_date=&global_id=T0604100120&assigned_name=S-13&store_num=		
GeoTracker Data:	https://geotracker.waterboards.ca.gov/profile_report.asp?cmd=MWEDFResults&global_id=T0604100120&assigned_name=S-13		

B17
ESE
1/2 - 1 Mile
Lower

CA WELLS **CAEDF0000051928**

Well ID:	T0604100120-S-21	Well Type:	MONITORING
Source:	EDF	Other Name:	S-21
GAMA PFAS Testing:	Not Reported		
Groundwater Quality Data:	https://gamagroundwater.waterboards.ca.gov/gama/gamamap/public/GamaDataDisplay.asp?dataset=EDF&samp_date=&global_id=T0604100120&assigned_name=S-21&store_num=		
GeoTracker Data:	https://geotracker.waterboards.ca.gov/profile_report.asp?cmd=MWEDFResults&global_id=T0604100120&assigned_name=S-21		

Map ID
Direction
Distance
Elevation | Database | EDR ID Number

B18
SE
1/2 - 1 Mile
Lower

CA WELLS **CAEDF0000051615**

Well ID:	T0604100120-S-23	Well Type:	MONITORING
Source:	EDF	Other Name:	S-23
GAMA PFAS Testing:	Not Reported		
Groundwater Quality Data:	https://gamagroundwater.waterboards.ca.gov/gama/gamamap/public/GamaDataDisplay.asp?dataset=EDF&samp_date=&global_id=T0604100120&assigned_name=S-23&store_num=		
GeoTracker Data:	https://geotracker.waterboards.ca.gov/profile_report.asp?cmd=MWEDFResults&global_id=T0604100120&assigned_name=S-23		

C19
NW
1/2 - 1 Mile
Lower

CA WELLS **CAEDF0000102914**

Well ID:	T0604100009-MW-5	Well Type:	MONITORING
Source:	EDF	Other Name:	MW-5
GAMA PFAS Testing:	Not Reported		
Groundwater Quality Data:	https://gamagroundwater.waterboards.ca.gov/gama/gamamap/public/GamaDataDisplay.asp?dataset=EDF&samp_date=&global_id=T0604100009&assigned_name=MW-5&store_num=		
GeoTracker Data:	https://geotracker.waterboards.ca.gov/profile_report.asp?cmd=MWEDFResults&global_id=T0604100009&assigned_name=MW-5		

C20
NW
1/2 - 1 Mile
Lower

AQUIFLOW **39035**

Site ID:	21-0009
Groundwater Flow:	W
Shallow Water Depth:	3.08
Deep Water Depth:	4.32
Average Water Depth:	Not Reported
Date:	10/28/1998

C21
NW
1/2 - 1 Mile
Lower

CA WELLS **CAEDF0000087839**

Well ID:	T0604100009-MW-4	Well Type:	MONITORING
Source:	EDF	Other Name:	MW-4
GAMA PFAS Testing:	Not Reported		
Groundwater Quality Data:	https://gamagroundwater.waterboards.ca.gov/gama/gamamap/public/GamaDataDisplay.asp?dataset=EDF&samp_date=&global_id=T0604100009&assigned_name=MW-4&store_num=		
GeoTracker Data:	https://geotracker.waterboards.ca.gov/profile_report.asp?cmd=MWEDFResults&global_id=T0604100009&assigned_name=MW-4		

C22
NW
1/2 - 1 Mile
Lower

CA WELLS **CAEDF0000023307**

Well ID:	T0604100009-MW-1	Well Type:	MONITORING
Source:	EDF	Other Name:	MW-1

GAMA PFAS Testing: Not Reported
Groundwater Quality Data: https://gamagroundwater.waterboards.ca.gov/gama/gamamap/public/GamaDataDisplay.asp?dataset=EDF&samp_date=&global_id=T0604100009&assigned_name=MW-1&store_num=
GeoTracker Data: https://geotracker.waterboards.ca.gov/profile_report.asp?cmd=MWEDFResults&global_id=T0604100009&assigned_name=MW-1

C23
NW
1/2 - 1 Mile
Lower

CA WELLS **CAEDF0000057563**

Well ID: T0604100009-MW-3 Well Type: MONITORING
Source: EDF Other Name: MW-3
GAMA PFAS Testing: Not Reported
Groundwater Quality Data: https://gamagroundwater.waterboards.ca.gov/gama/gamamap/public/GamaDataDisplay.asp?dataset=EDF&samp_date=&global_id=T0604100009&assigned_name=MW-3&store_num=
GeoTracker Data: https://geotracker.waterboards.ca.gov/profile_report.asp?cmd=MWEDFResults&global_id=T0604100009&assigned_name=MW-3

C24
NW
1/2 - 1 Mile
Lower

CA WELLS **CAEDF0000085433**

Well ID: T0604100009-MW-2 Well Type: MONITORING
Source: EDF Other Name: MW-2
GAMA PFAS Testing: Not Reported
Groundwater Quality Data: https://gamagroundwater.waterboards.ca.gov/gama/gamamap/public/GamaDataDisplay.asp?dataset=EDF&samp_date=&global_id=T0604100009&assigned_name=MW-2&store_num=
GeoTracker Data: https://geotracker.waterboards.ca.gov/profile_report.asp?cmd=MWEDFResults&global_id=T0604100009&assigned_name=MW-2

D25
North
1/2 - 1 Mile
Lower

CA WELLS **CAEDF0000100888**

Well ID: T0604100110-E-16 Well Type: MONITORING
Source: EDF Other Name: E-16
GAMA PFAS Testing: Not Reported
Groundwater Quality Data: https://gamagroundwater.waterboards.ca.gov/gama/gamamap/public/GamaDataDisplay.asp?dataset=EDF&samp_date=&global_id=T0604100110&assigned_name=E-16&store_num=
GeoTracker Data: https://geotracker.waterboards.ca.gov/profile_report.asp?cmd=MWEDFResults&global_id=T0604100110&assigned_name=E-16

D26
North
1/2 - 1 Mile
Lower

CA WELLS **CAEDF0000054716**

Well ID: T0604100110-E-14 Well Type: MONITORING
Source: EDF Other Name: E-14
GAMA PFAS Testing: Not Reported
Groundwater Quality Data: https://gamagroundwater.waterboards.ca.gov/gama/gamamap/public/GamaDataDisplay.asp?dataset=EDF&samp_date=&global_id=T0604100110&assigned_name=E-14&store_num=

GeoTracker Data: https://geotracker.waterboards.ca.gov/profile_report.asp?cmd=MWEDFResults&global_id=T0604100110&assigned_name=E-14

D27
North
1/2 - 1 Mile
Lower

CA WELLS **CAEDF0000090109**

Well ID:	T0604100110-E-5	Well Type:	MONITORING
Source:	EDF	Other Name:	E-5
GAMA PFAS Testing:	Not Reported		
Groundwater Quality Data:	https://gamagroundwater.waterboards.ca.gov/gama/gamamap/public/GamaDataDisplay.asp?dataset=EDF&samp_date=&global_id=T0604100110&assigned_name=E-5&store_num=		
GeoTracker Data:	https://geotracker.waterboards.ca.gov/profile_report.asp?cmd=MWEDFResults&global_id=T0604100110&assigned_name=E-5		

D28
North
1/2 - 1 Mile
Lower

CA WELLS **CAEDF0000074813**

Well ID:	T0604100110-E-9	Well Type:	MONITORING
Source:	EDF	Other Name:	E-9
GAMA PFAS Testing:	Not Reported		
Groundwater Quality Data:	https://gamagroundwater.waterboards.ca.gov/gama/gamamap/public/GamaDataDisplay.asp?dataset=EDF&samp_date=&global_id=T0604100110&assigned_name=E-9&store_num=		
GeoTracker Data:	https://geotracker.waterboards.ca.gov/profile_report.asp?cmd=MWEDFResults&global_id=T0604100110&assigned_name=E-9		

D29
North
1/2 - 1 Mile
Lower

CA WELLS **CAEDF0000036424**

Well ID:	T0604100110-E-15	Well Type:	MONITORING
Source:	EDF	Other Name:	E-15
GAMA PFAS Testing:	Not Reported		
Groundwater Quality Data:	https://gamagroundwater.waterboards.ca.gov/gama/gamamap/public/GamaDataDisplay.asp?dataset=EDF&samp_date=&global_id=T0604100110&assigned_name=E-15&store_num=		
GeoTracker Data:	https://geotracker.waterboards.ca.gov/profile_report.asp?cmd=MWEDFResults&global_id=T0604100110&assigned_name=E-15		

D30
North
1/2 - 1 Mile
Lower

CA WELLS **CAEDF0000067841**

Well ID:	T0604100110-E-21	Well Type:	MONITORING
Source:	EDF	Other Name:	E-21
GAMA PFAS Testing:	Not Reported		
Groundwater Quality Data:	https://gamagroundwater.waterboards.ca.gov/gama/gamamap/public/GamaDataDisplay.asp?dataset=EDF&samp_date=&global_id=T0604100110&assigned_name=E-21&store_num=		
GeoTracker Data:	https://geotracker.waterboards.ca.gov/profile_report.asp?cmd=MWEDFResults&global_id=T0604100110&assigned_name=E-21		

GEOCHECK® - PHYSICAL SETTING SOURCE MAP FINDINGS

Map ID
Direction
Distance
Elevation

	Database	EDR ID Number
D31 **North** **1/2 - 1 Mile** **Lower**	**CA WELLS**	**CAEDF0000066441**

Well ID:	T0604100110-E-8	Well Type:	MONITORING
Source:	EDF	Other Name:	E-8
GAMA PFAS Testing:	Not Reported		
Groundwater Quality Data:	https://gamagroundwater.waterboards.ca.gov/gama/gamamap/public/GamaDataDisplay.asp?dataset=EDF&samp_date=&global_id=T0604100110&assigned_name=E-8&store_num=		
GeoTracker Data:	https://geotracker.waterboards.ca.gov/profile_report.asp?cmd=MWEDFResults&global_id=T0604100110&assigned_name=E-8		

D32 **North** **1/2 - 1 Mile** **Lower**	Site ID:	21-0303	**AQUIFLOW**	**39233**
	Groundwater Flow:	Varies		
	Shallow Water Depth:	1.97		
	Deep Water Depth:	4.46		
	Average Water Depth:	Not Reported		
	Date:	01/06/1999		

	Database	EDR ID Number
D33 **North** **1/2 - 1 Mile** **Lower**	**CA WELLS**	**CAEDF0000045502**

Well ID:	T0604100110-E-13	Well Type:	MONITORING
Source:	EDF	Other Name:	E-13
GAMA PFAS Testing:	Not Reported		
Groundwater Quality Data:	https://gamagroundwater.waterboards.ca.gov/gama/gamamap/public/GamaDataDisplay.asp?dataset=EDF&samp_date=&global_id=T0604100110&assigned_name=E-13&store_num=		
GeoTracker Data:	https://geotracker.waterboards.ca.gov/profile_report.asp?cmd=MWEDFResults&global_id=T0604100110&assigned_name=E-13		

1G **North** **1/2 - 1 Mile** **Lower**	Site ID:	21-0303	**AQUIFLOW**	**39233**
	Groundwater Flow:	Varies		
	Shallow Water Depth:	1.97		
	Deep Water Depth:	4.46		
	Average Water Depth:	Not Reported		
	Date:	01/06/1999		

2G **NW** **1/2 - 1 Mile** **Lower**	Site ID:	21-0009	**AQUIFLOW**	**39035**
	Groundwater Flow:	W		
	Shallow Water Depth:	3.08		
	Deep Water Depth:	4.32		
	Average Water Depth:	Not Reported		
	Date:	10/28/1998		

GEOCHECK® - PHYSICAL SETTING SOURCE MAP FINDINGS

Map ID Direction Distance Elevation			Database	EDR ID Number
3G **NW** **1/2 - 1 Mile** **Lower**	Site ID: Groundwater Flow: Shallow Water Depth: Deep Water Depth: Average Water Depth: Date:	21-0044 NE and SW 1.99 7.43 Not Reported 11/20/1996	**AQUIFLOW**	**39062**
4G **NW** **1/4 - 1/2 Mile** **Lower**	Site ID: Groundwater Flow: Shallow Water Depth: Deep Water Depth: Average Water Depth: Date:	21-0314 Varies 1.79 3.10 Not Reported 06/05/1998	**AQUIFLOW**	**39221**

GEOCHECK® - PHYSICAL SETTING SOURCE MAP FINDINGS
RADON

AREA RADON INFORMATION

State Database: CA Radon

Radon Test Results

Zipcode	Num Tests	> 4 pCi/L
94965	29	0

Federal EPA Radon Zone for MARIN County: 3

Note: Zone 1 indoor average level > 4 pCi/L.
: Zone 2 indoor average level >= 2 pCi/L and <= 4 pCi/L.
: Zone 3 indoor average level < 2 pCi/L.

Federal Area Radon Information for MARIN COUNTY, CA

Number of sites tested: 52

Area	Average Activity	% <4 pCi/L	% 4-20 pCi/L	% >20 pCi/L
Living Area - 1st Floor	0.800 pCi/L	96%	4%	0%
Living Area - 2nd Floor	Not Reported	Not Reported	Not Reported	Not Reported
Basement	0.617 pCi/L	100%	0%	0%

PHYSICAL SETTING SOURCE RECORDS SEARCHED

TOPOGRAPHIC INFORMATION

USGS 7.5' Digital Elevation Model (DEM)
Source: United States Geologic Survey
EDR acquired the USGS 7.5' Digital Elevation Model in 2002 and updated it in 2006. The 7.5 minute DEM corresponds to the USGS 1:24,000- and 1:25,000-scale topographic quadrangle maps. The DEM provides elevation data with consistent elevation units and projection.

Current USGS 7.5 Minute Topographic Map
Source: U.S. Geological Survey

HYDROLOGIC INFORMATION

Flood Zone Data: This data was obtained from the Federal Emergency Management Agency (FEMA). It depicts 100-year and 500-year flood zones as defined by FEMA. It includes the National Flood Hazard Layer (NFHL) which incorporates Flood Insurance Rate Map (FIRM) data and Q3 data from FEMA in areas not covered by NFHL.
Source: FEMA
Telephone: 877-336-2627
Date of Government Version: 2003, 2015

NWI: National Wetlands Inventory. This data, available in select counties across the country, was obtained by EDR in 2002, 2005, 2010 and 2015 from the U.S. Fish and Wildlife Service.

State Wetlands Data: Wetland Inventory
Source: Department of Fish and Wildlife
Telephone: 916-445-0411

HYDROGEOLOGIC INFORMATION

AQUIFLOW^{R} Information System
Source: EDR proprietary database of groundwater flow information
EDR has developed the AQUIFLOW Information System (AIS) to provide data on the general direction of groundwater flow at specific points. EDR has reviewed reports submitted to regulatory authorities at select sites and has extracted the date of the report, hydrogeologically determined groundwater flow direction and depth to water table information.

GEOLOGIC INFORMATION

Geologic Age and Rock Stratigraphic Unit
Source: P.G. Schruben, R.E. Arndt and W.J. Bawiec, Geology of the Conterminous U.S. at 1:2,500,000 Scale - A digital representation of the 1974 P.B. King and H.M. Beikman Map, USGS Digital Data Series DDS - 11 (1994).

STATSGO: State Soil Geographic Database
Source: Department of Agriculture, Natural Resources Conservation Service (NRCS)
The U.S. Department of Agriculture's (USDA) Natural Resources Conservation Service (NRCS) leads the national Conservation Soil Survey (NCSS) and is responsible for collecting, storing, maintaining and distributing soil survey information for privately owned lands in the United States. A soil map in a soil survey is a representation of soil patterns in a landscape. Soil maps for STATSGO are compiled by generalizing more detailed (SSURGO) soil survey maps.

SSURGO: Soil Survey Geographic Database
Source: Department of Agriculture, Natural Resources Conservation Service (NRCS)
Telephone: 800-672-5559
SSURGO is the most detailed level of mapping done by the Natural Resources Conservation Service, mapping scales generally range from 1:12,000 to 1:63,360. Field mapping methods using national standards are used to construct the soil maps in the Soil Survey Geographic (SSURGO) database. SSURGO digitizing duplicates the original soil survey maps. This level of mapping is designed for use by landowners, townships and county natural resource planning and management.

PHYSICAL SETTING SOURCE RECORDS SEARCHED

LOCAL / REGIONAL WATER AGENCY RECORDS

FEDERAL WATER WELLS

PWS: Public Water Systems
Source: EPA/Office of Drinking Water
Telephone: 202-564-3750
Public Water System data from the Federal Reporting Data System. A PWS is any water system which provides water to at least 25 people for at least 60 days annually. PWSs provide water from wells, rivers and other sources.

PWS ENF: Public Water Systems Violation and Enforcement Data
Source: EPA/Office of Drinking Water
Telephone: 202-564-3750
Violation and Enforcement data for Public Water Systems from the Safe Drinking Water Information System (SDWIS) after August 1995. Prior to August 1995, the data came from the Federal Reporting Data System (FRDS).

USGS Water Wells: USGS National Water Inventory System (NWIS)
This database contains descriptive information on sites where the USGS collects or has collected data on surface water and/or groundwater. The groundwater data includes information on wells, springs, and other sources of groundwater.

OTHER STATE DATABASE INFORMATION

Groundwater Ambient Monitoring & Assessment Program
State Water Resources Control Board
Telephone: 916-341-5577
The GAMA Program is Californias comprehensive groundwater quality monitoring program. GAMA collects data by testing the untreated, raw water in different types of wells for naturally-occurring and man-made chemicals. The GAMA data includes Domestic, Monitoring and Municipal well types from the following sources, Department of Water Resources, Department of Heath Services, EDF, Agricultural Lands, Lawrence Livermore National Laboratory, Department of Pesticide Regulation, United States Geological Survey, Groundwater Ambient Monitoring and Assessment Program and Local Groundwater Projects.

Water Well Database
Source: Department of Water Resources
Telephone: 916-651-9648

California Drinking Water Quality Database
Source: Department of Public Health
Telephone: 916-324-2319
The database includes all drinking water compliance and special studies monitoring for the state of California since 1984. It consists of over 3,200,000 individual analyses along with well and water system information.

California Oil and Gas Well Locations
Source: Dept of Conservation, Geologic Energy Management Division
Telephone: 916-323-1779
Oil and Gas well locations in the state.

California Earthquake Fault Lines
Source: California Division of Mines and Geology
The fault lines displayed on EDR's Topographic map are digitized quaternary fault lines prepared in 1975 by the United State Geological Survey. Additional information (also from 1975) regarding activity at specific fault lines comes from California's Preliminary Fault Activity Map prepared by the California Division of Mines and Geology.

RADON

State Database: CA Radon
Source: Department of Public Health
Telephone: 916-210-8558
Radon Database for California

PHYSICAL SETTING SOURCE RECORDS SEARCHED

Area Radon Information
Source: USGS
Telephone: 703-356-4020
The National Radon Database has been developed by the U.S. Environmental Protection Agency (USEPA) and is a compilation of the EPA/State Residential Radon Survey and the National Residential Radon Survey. The study covers the years 1986 - 1992. Where necessary data has been supplemented by information collected at private sources such as universities and research institutions.

EPA Radon Zones
Source: EPA
Telephone: 703-356-4020
Sections 307 & 309 of IRAA directed EPA to list and identify areas of U.S. with the potential for elevated indoor radon levels.

OTHER

Airport Landing Facilities: Private and public use landing facilities
Source: Federal Aviation Administration, 800-457-6656

Epicenters: World earthquake epicenters, Richter 5 or greater
Source: Department of Commerce, National Oceanic and Atmospheric Administration

California Earthquake Fault Lines: The fault lines displayed on EDR's Topographic map are digitized quaternary fault lines, prepared in 1975 by the United State Geological Survey. Additional information (also from 1975) regarding activity at specific fault lines comes from California's Preliminary Fault Activity Map prepared by the California Division of Mines and Geology.

STREET AND ADDRESS INFORMATION

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APPENDIX C

REGULATORY RECORDS SEARCH

APPENDIX C-1

REGULATORY RECORDS SEARCH

CALIFORNIA STATE
REGIONAL WATER QUALITY CONTROL BOARD

Hagop Tatian

From: Hagop Tatian
Sent: Wednesday, January 4, 2023 8:51 AM
To: mwong@waterboards.ca.gov
Subject: Public Record Request: 825 Drake Avenue, Sausalito (Marin City), CA 94965

To: RWQCB – San Francisco Bay Region

KCE Matrix would like to inquire if the RWQCB agency maintains any records and/or documentation with regard to Underground Storage Tanks (USTs), Hazardous Materials (HAZMAT) and/or associated environmental assessment or remediation documentation for the following property:

825 Drake Avenue
Sausalito (Marin City), California 94965

If the waterboard does maintain such records, please advise as to the necessary procedure to obtain such records from your office.

Should you have any questions or require additional information, please do not hesitate to contact our office at (818) 559 5500.

Thank you.

Sincerely,

Hagop Tatian

KCE Matrix, Inc.
1112 W. Burbank Blvd., Suite 301
Burbank, CA 91506
(818) 559 5500 phone
(818) 559 5511 fax
hagop@kcematrixinc.com

Hagop Tatian

From: Wong, Melinda@Waterboards <Melinda.Wong@waterboards.ca.gov>
Sent: Tuesday, January 10, 2023 3:39 PM
To: Hagop Tatian
Subject: RE: PRA 22-0365 Record Request: 825 Drake Avenue, Sausalito (Marin City), CA 94965

Hello Hagop,

The San Francisco Bay Regional Water Board received your January 4, 2023 file review request, which seeks records related to the address as described below. Based on a thorough search, the San Francisco Bay Water Board does not possess any records responsive to your request.

I would recommend contacting the local agency, Marin County Health Department, LOP for any further information they may have.

Thank you,

Melinda Wong
Management Services Division
San Francisco Bay Water Board
1515 Clay Street, Suite 1400
Oakland, CA 94612
Phone: (510) 622-2430
Email: mwong@waterboards.ca.gov
Fax: (510) 622-2095 direct line for Public Records Act request
PRA Request Email: RB2-PRA-Request@Waterboards.ca.gov

From: Hagop Tatian <hagop@kcematrixinc.com>
Sent: Wednesday, January 4, 2023 8:51 AM
To: Wong, Melinda@Waterboards <Melinda.Wong@waterboards.ca.gov>
Subject: Public Record Request: 825 Drake Avenue, Sausalito (Marin City), CA 94965

EXTERNAL:

To: RWQCB – San Francisco Bay Region

KCE Matrix would like to inquire if the RWQCB agency maintains any records and/or documentation with regard to Underground Storage Tanks (USTs), Hazardous Materials (HAZMAT) and/or associated environmental assessment or remediation documentation for the following property:

825 Drake Avenue
Sausalito (Marin City), California 94965

If the waterboard does maintain such records, please advise as to the necessary procedure to obtain such records from your office.

Should you have any questions or require additional information, please do not hesitate to contact our office at (818) 559 5500.

APPENDIX C-2

REGULATORY RECORDS SEARCH

CALIFORNIA STATE
DEPARTMENT OF TOXIC SUBSTANCE CONTROL

Hagop Tatian

From: Hagop Tatian
Sent: Wednesday, January 4, 2023 8:53 AM
To: BerkeleyFileRoom@DTSC
Subject: Public Record Request: 825 Drake Avenue, Sausalito (Marin City), CA 94965

To: DTSC – Berkeley Office/File Room

KCE Matrix would like to inquire if the DTSC maintains any records and/or documentation with regard to Underground Storage Tanks (USTs), Hazardous Materials (HAZMAT) and/or associated environmental assessment or remediation documentation for the following property:

825 Drake Avenue
Sausalito (Marin City), California 94965

If the DTSC does maintain such records, please advise as to the necessary procedure to obtain such records from your office.

Should you have any questions or require additional information, please do not hesitate to contact our office at (818) 559 5500.

Thank you.

Sincerely,

Hagop Tatian

KCE Matrix, Inc.
1112 W. Burbank Blvd., Suite 301
Burbank, CA 91506
(818) 559 5500 phone
(818) 559 5511 fax
hagop@kcematrixinc.com

Department of Toxic Substances Control

Yana Garcia
Secretary for
Environmental Protection

Meredith Williams, Ph.D.
Director
700 Heinz Avenue
Berkeley, California 94710-2721

Gavin Newsom
Governor

January 12, 2023

Mr. Hagop Tatian
KCE Matrix, Inc.
hagop@kcematrixinc.com

Public Records Request Number: PR2-010423-01

Location: 825 Drake Avenue
Sausalito (Marin City), CA 94965

Dear Mr. Tatian:

We have received your Public Records Act Request at the Department of Toxic Substances Control (DTSC). Upon thorough review of our files, we found no records pertaining to the site(s) referenced above.

For information regarding public reports on hazardous waste shipments of generators, transporters, and TSDFs, you can access our Hazardous Waste Tracking System (HWTS) online at: https://hwts.dtsc.ca.gov/. Select the "Reports" tab for search options. If you are interested in retrieving detailed reports, please contact the HWTS unit via e-mail: hwtsreports@dtsc.ca.gov or phone: 1-800-618-6942. Customized reports may require a fee. For copies of manifests, please send an e-mail to mcr@dtsc.ca.gov.

In addition, the DTSC provides access to public records online via EnviroStor; another data management system that tracks our efforts in cleanup, permitting, enforcement, and investigation of known/suspected hazardous waste sites and facilities. The available data is updated in real-time. You can access Envirostor online at www.envirostor.dtsc.ca.gov. Navigate the website easily by clicking the "How to Use EnviroStor" tab, then selecting the option "Take a Tour."

If you have any questions or would like further information regarding your request, please contact me via phone: 510-540-3800 or e-mail: Berkeleyfileroom@dtsc.ca.gov.

Best regards,

(Rose) Ann Reeser

(Rose) Ann Reeser
Regional Records Coordinator
DTSC Berkeley Regional Office
Department of Toxic Substances Control
700 Heinz Ave., Berkeley, California 94710-2721
California Environmental Protection Agency

Yana Garcia
Secretary for
Environmental Protection

Department of Toxic Substances Control
Meredith Williams, Ph.D., Director
1001 "I" Street
P.O. Box 806
Sacramento, California 95812-0806

Gavin Newsom
Governor

Facility Search Results

Selection Criteria:

Facility:	
Search on:	Physical Address
Street:	825
Zip:	94965
Status:	Active and Inactive
Sort Direction:	asc
Sorted By:	EPA ID
Records Found:	1

EPA ID Number	Name	Address	City	Zip
CAC002365527	THE VILLAGE BAPTIST CHURCH	825 DRAKE AVE	MARIN CITY	949650000

The Department of Toxics Substances Control (DTSC) takes every precaution to ensure the accuracy of data in the Hazardous Waste Tracking System (HWTS). However, because of the large number of manifests handled, inaccuracies in the submitted data, limitations of the manifest system and the technical limitations of the database, DTSC cannot guarantee that the data accurately reflect what was actually transported or produced.

Report Generation Date: 01/23/2023

Yana Garcia
Secretary for
Environmental Protection

Department of Toxic Substances Control
Meredith Williams, Ph.D., Director
1001 "I" Street
P.O. Box 806
Sacramento, California 95812-0806

Gavin Newsom
Governor

EPA ID PROFILE

Map

ID Number:	CAC002365527	**Status:**	INACTIVE
Name:	THE VILLAGE BAPTIST CHURCH	**Inactive Date:**	9/10/2002 1:43:43 PM
County:	MARIN	**Record Entered:**	8/24/2001 12:00:00 AM
NAICS:	N/A	**Last Updated:**	8/24/2001 12:00:00 AM

	Name	Address	City	State	Zip Code	Phone
Location	THE VILLAGE BAPTIST CHURCH	825 DRAKE AVE	MARIN CITY	CA	949650000	
Mailing		825 DRAKE AVE	MARIN CITY	CA	949650000	
Owner	THE VILLAGE BAPTIST CHURCH	825 DRAKE AVE	MARIN CITY	CA	949650000	4153321556
Operator/Contact	KYLE PICKETT/AM TECH	3201 DIABLO AVE	HAYWARD	CA	945450000	5102655510

Based Only Upon ID Number: **CAC002365527**

Calif. Manifests?	Non Calif. Manifests?	Transporter Registration?
Yes	N/A	N/A

California and Non California Manifest Tonnage Total and Waste Code by Year Matrix by Entity Type (if available) are on the next page

Calif. Manifest Counts and Total Tonnage

Top line represents Manifest Count and Bottom line represents Total Tonnage

Year	Generator	Trans. 1	Trans. 2	TSDF	ALT. TSDF
2002	4 88.49400	0 0.00000	0 0.00000	0 0.00000	0 0.00000

Non California Manifest Total Tonnage

No Records Found

Waste Code Matrix					
California	Generator	Trans. 1	Trans. 2	TSDF	Alt. TSDF
RCRA	Generator	Trans. 1	Trans. 2	TSDF	Alt. TSDF

Waste Code Matrix as a spreadsheet

The Department of Toxics Substances Control (DTSC) takes every precaution to ensure the accuracy of data in the Hazardous Waste Tracking System (HWTS). However, because of the large number of manifests handled, inaccuracies in

the submitted data, limitations of the manifest system and the technical limitations of the database, DTSC cannot guarantee that the data accurately reflect what was actually transported or produced.

Report Generation Date: 01/23/2023

Results for California Waste Codes, as a Generator, for EPA-ID: CAC002365527

Calif. Waste Code	Description	2002
151	ASBESTOS-CONTAINING WASTE	88.494
	Grand Total	88.494

No results for California Waste Codes, as a Transporter 1, for EPA-ID: CAC002365527
No results for California Waste Codes, as a Transporter 2, for EPA-ID: CAC002365527
No results for California Waste Codes, as a TSDF, for EPA-ID: CAC002365527
No results for California Waste Codes, as a Alternate TSDF, for EPA-ID: CAC002365527
Results for RCRA, as a Generator, for EPA-ID: CAC002365527

RCRA	Description	2002
	Blank/Unknown	88.494
	Grand Total	88.494

No results for RCRA, as a Transporter 1, for EPA-ID: CAC002365527
No results for RCRA, as a Transporter 2, for EPA-ID: CAC002365527
No results for RCRA, as a TSDF, for EPA-ID: CAC002365527
No results for RCRA, as a Alternate TSDF, for EPA-ID: CAC002365527

APPENDIX C-3

REGULATORY RECORDS SEARCH

MARIN COUNTY
CERTIFIED UNIFIED PROGRAM AGENCY

Hagop Tatian

From: Hagop Tatian
Sent: Wednesday, January 4, 2023 8:58 AM
To: CUPA@marincounty.org
Subject: Public Record Request: 825 Drake Avenue, Sausalito (Marin City), CA 94965
Attachments: Public Record Request Form (KCE Matrix) (1-4-23).pdf

To: Marin County - CUPA/Records

KCE Matrix would like to inquire if the Marin County – CUPA maintains any records and/or documentation with regard to Underground Storage Tanks (USTs), Hazardous Materials (HAZMAT) and/or associated environmental assessment or remediation documentation for the following property:

825 Drake Avenue
Sausalito (Marin City), California 94965

If the Marin County – CUPA does maintain such records, please advise as to the necessary procedure to obtain such records from your office.

Should you have any questions or require additional information, please do not hesitate to contact our office at (818) 559 5500.

Thank you.

Sincerely,

Hagop Tatian

KCE Matrix, Inc.
1112 W. Burbank Blvd., Suite 301
Burbank, CA 91506
(818) 559 5500 phone
(818) 559 5511 fax
hagop@kcematrixinc.com

Certified Unified Program Agency

County of Marin – Waste Management Division

P.O. Box 4186, San Rafael, CA 94913-4186
1600 Los Gamos Drive, Suite 210, San Rafael, CA 94903
PHONE: (415) 473-6647 FAX: (415) 473-2391
www.marincounty.org/depts/pw/divisions/waste-management

PLEASE NOTE: Department of Public Works, Waste Management Division's jurisdiction now encompasses all of Marin County CUPA business sites. Our office maintains files for current and closed sites. Please contact Melinda Wong at the California Regional Water Quality Control Board at (510) 622-2430 for closed files from City of San Rafael.

Please fax (415-473-2391) or e-mail (CUPA@marincounty.org) this request 48 hours in advance to confirm an appointment time between the hours of 8:30 am - 11:30 am and 1:30 pm - 4:00 pm Monday through Friday.

Photocopier is available for use @ $0.15 per copy. Payment by check or exact cash at the time of the appointment is required. Thank you in advance for not wearing perfume/cologne during your file review.

Please complete the following information for your file review(s)

Company/Agency: KCE Matrix, Inc.

Name/phone number/e-mail: Hagop / (818)559 5500
Email: hagop@kcematrixinc.com

Date & time to schedule file review: Copies of records required

CUPA files
Business name and address of CUPA file(s) requested: **Open/Closed**

1. 825 Drake Avenue, Sausalito, CA 94965 — Yes / Yes
2. _____ ____/____
3. _____ ____/____
4. _____ ____/____
5. _____ ____/____
6. _____ ____/____
7. _____ ____/____

Contact:
Administrative Assistant
Phone (415) 473-6647 - Fax (415) 473-2391

FOR OFFICE USE ONLY:

Date Received _____ Date E-mailed to County Counsel_____

Hagop Tatian

From: Magallanes, Rubie <rmagallanes@marincounty.org>
Sent: Friday, January 6, 2023 12:16 PM
To: Hagop Tatian
Subject: RE: Public Record Request: 825 Drake Avenue, Sausalito (Marin City), CA 94965
Attachments: Tatian_1.6.23.pdf

Please see attached. Thank you.

-Rubie Magallanes

From: Hagop Tatian <hagop@kcematrixinc.com>
Sent: Wednesday, January 4, 2023 8:58 AM
To: CUPA <CUPA@marincounty.org>
Subject: Public Record Request: 825 Drake Avenue, Sausalito (Marin City), CA 94965

> Some people who received this message don't often get email from hagop@kcematrixinc.com. Learn why this is important

To: Marin County - CUPA/Records

KCE Matrix would like to inquire if the Marin County – CUPA maintains any records and/or documentation with regard to Underground Storage Tanks (USTs), Hazardous Materials (HAZMAT) and/or associated environmental assessment or remediation documentation for the following property:

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If the Marin County – CUPA does maintain such records, please advise as to the necessary procedure to obtain such records from your office.

Should you have any questions or require additional information, please do not hesitate to contact our office at (818) 559 5500.

Thank you.

Sincerely,

Hagop Tatian

KCE Matrix, Inc.
1112 W. Burbank Blvd., Suite 301
Burbank, CA 91506
(818) 559 5500 phone
(818) 559 5511 fax
hagop@kcematrixinc.com
Email Disclaimer: https://www.marincounty.org/main/disclaimers

Certified Unified Program Agency

County of Marin – Waste Management Division

P.O. Box 4186, San Rafael, CA 94913-4186
1600 Los Gamos Drive, Suite 210, San Rafael, CA 94903
PHONE: (415) 473-6647 FAX: (415) 473-2391
www.marincounty.org/depts/pw/divisions/waste-management

PLEASE NOTE: Department of Public Works, Waste Management Division's jurisdiction now encompasses all of Marin County CUPA business sites. Our office maintains files for current and closed sites. Please contact Melinda Wong at the California Regional Water Quality Control Board at (510) 622-2430 for closed files from City of San Rafael.

Please fax (415-473-2391) or e-mail (CUPA@marincounty.org) this request 48 hours in advance to confirm an appointment time between the hours of 8:30 am - 11:30 am and 1:30 pm - 4:00 pm Monday through Friday.

Photocopier is available for use @ $0.15 per copy. Payment by check or exact cash at the time of the appointment is required. Thank you in advance for not wearing perfume/cologne during your file review.

Please complete the following information for your file review(s)

Company/Agency: KCE Matrix, Inc.

Name/phone number/e-mail: Hagop / (818)559 5500
Email: hagop@kcematrixinc.com

Date & time to schedule file review: Copies of records required

CUPA files

Business name and address of CUPA file(s) requested:	**Open/Closed**
1. 825 Drake Avenue, Sausalito, CA 94965	Yes / Yes
2. no files available for review	/
3.	/
4.	/
5.	/
6.	/
7.	/

Contact:
Administrative Assistant
Phone (415) 473-6647 - Fax (415) 473-2391

FOR OFFICE USE ONLY:

Date Received 1.4.23 Date E-mailed to County Counsel 1.6.23

APPENDIX C-4

REGULATORY RECORDS SEARCH

MARIN COUNTY FIRE DEPARTMENT

Skip to main content

Public Record Requests

County of Marin, CA

Request Visibility: Unpublished

Request 23-12 Open

Dates

Received

January 4, 2023 via web

Requester

Hagop T.

hagop@kcematrixinc.com

1112 W. Burbank Blvd., Suite 301, Burbank, CA, 91506

8185595500

KCE Matrix, Inc. /Hagop T.

Staff Assigned

Departments

No departments assigned

Point of contact

Kerry Gerchow

Request

To: Marin County Fire Department:

We would like to inquire if the Marin County Fire Department maintains any records and/or documentation with regard to Underground Storage Tanks (USTs), Hazardous Materials (HAZMAT) and/or associated environmental assessment or remediation documentation for the following property:

825 Drake Avenue, Sausalito (Marin City), California 94965

If the County Fire Department does maintain such records, please advise as to the necessary procedure to obtain such records from your office.

Timeline | Documents

Request Opened Public

Request received via web

COUNTY OF MARIN

OFFICE OF THE
COUNTY COUNSEL

Brian E. Washington
COUNTY COUNSEL

Renee Giacomini Brewer
ASSISTANT COUNTY COUNSEL

Jenna J. Brady
CHIEF DEPUTY COUNTY COUNSEL

Patrick M. K. Richardson
Stephen R. Raab
Steven M. Perl
Kerry L. Gerchow
Tarisha K. Bal
Deidre K. Smith
Brandon W. Halter
Sarah B. Anker
Kate K. Stanford
Scott Drexel

DEPUTIES

Colleen McGrath
ADMINISTRATIVE SERVICES
OFFICER

Marin County Civic Center
3501 Civic Center Drive
Suite 275
San Rafael, CA 94903
415 473 6117 T
415 473 3796 F
415 473 2226 TTY
www.marincounty.org/cl

January 17, 2023

VIA NEXTREQUEST ONLY

Hagpo T.
KCE Matrix, Inc/ Hagpo T.
1112 W. Burbank Blvd., Suite 301
Burbank, CA, 91506
hagop@kcematrixinc.com

Re: Public Records Act Request dated January 4, 2023
File No. 23-12

Dear Requester,

My office represents the County of Marin. We are in receipt of your Public Records Act (PRA) request, dated January 4, 2022. Below is your request with a corresponding response.

Request No. 1: We would like to inquire if the Marin County Fire Department maintains any records and/or documentation with regard to Underground Storage Tanks (USTs), Hazardous Materials (HAZMAT) and/or associated environmental assessment or remediation documentation for the following property:

825 Drake Avenue, Sausalito (Marin City), California 94965

Response to Request No. 1: The County of Marin Fire Department does not have any responsive records to your request. However, Marin County Certified Unified Programs Agency (CUPA) records can be accessed by completing the following form and submitting directly to CUPA. https://www.marincounty.org/-/media/files/departments/pw/forms/cupa_file_review_request.pdf?la=en

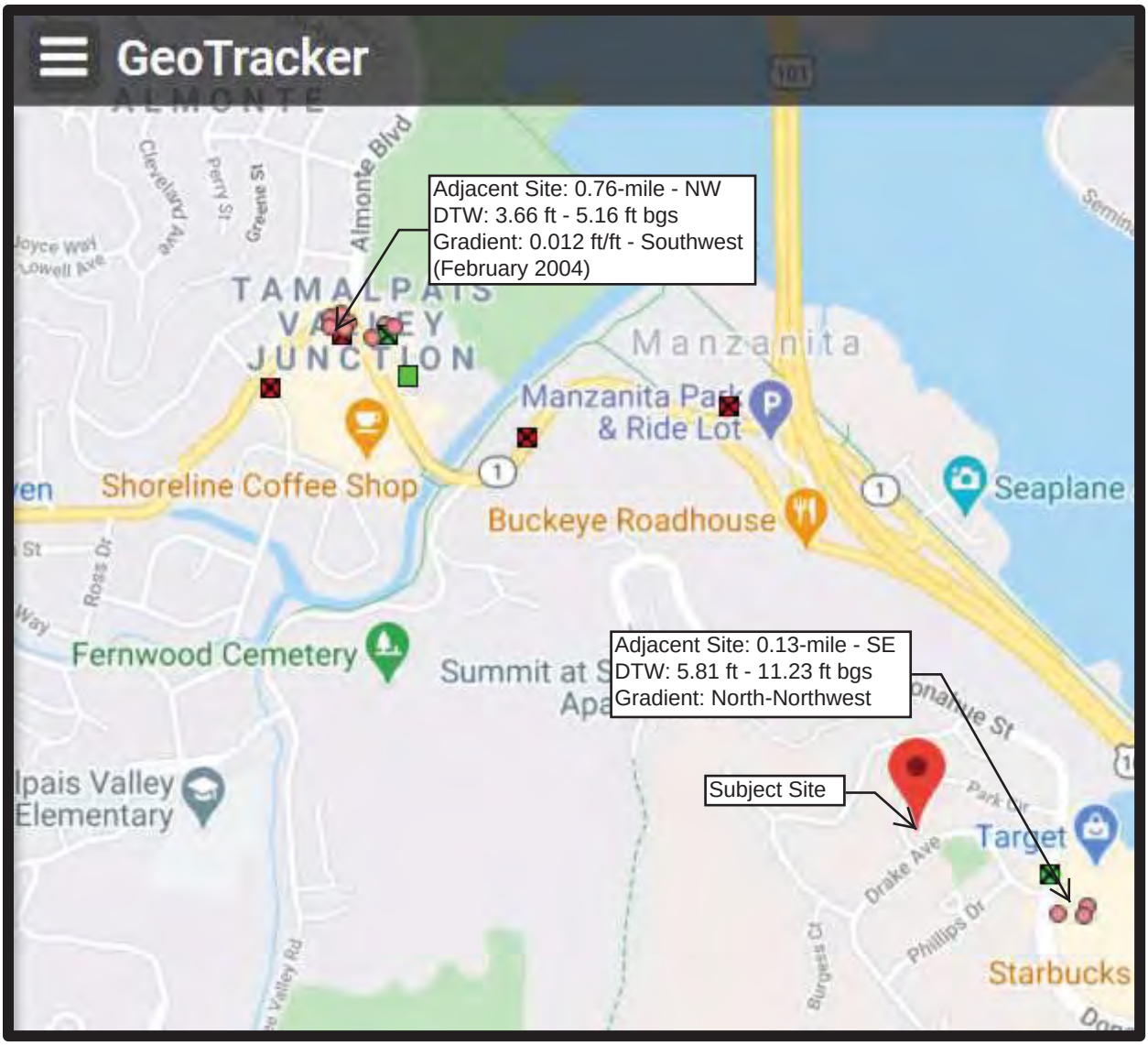
If you need any further assistance, please do not hesitate to contact me directly.

Sincerely,

Stephen Raab
Deputy County Counsel

APPENDIX C-5

HYDROLOGY INFORMATION


GeoTracker
Adjacent Site: 0.76-mile - NW
DTW: 3.66 ft - 5.16 ft bgs
Gradient: 0.012 ft/ft - Southwest
(February 2004)
TAMALPAIS VALLEY JUNCTION
Manzanita
Manzanita Park & Ride Lot
Shoreline Coffee Shop
Buckeye Roadhouse
Seaplane
Fernwood Cemetery
Adjacent Site: 0.13-mile - SE
DTW: 5.81 ft - 11.23 ft bgs
Gradient: North-Northwest
Subject Site
Target
Starbucks
Almonte Blvd
Cleveland Ave
Perry St
Greenwood Ave
Ross Dr
Drake Ave
Phillips Dr
Burgess Ct
Park Dr

APPENDIX C-6

NATIONAL WETLANDS INVENTORY -
WETLAND MAP

U.S. Fish and Wildlife Service
National Wetlands Inventory

Wetlands

January 24, 2023

Wetlands

- Estuarine and Marine Deepwater
- Estuarine and Marine Wetland
- Freshwater Emergent Wetland
- Freshwater Forested/Shrub Wetland
- Freshwater Pond
- Lake
- Other
- Riverine

This map is for general reference only. The US Fish and Wildlife Service is not responsible for the accuracy or currentness of the base data shown on this map. All wetlands related data should be used in accordance with the layer metadata found on the Wetlands Mapper web site.

APPENDIX C-7

FEDERAL EMERGENCY MANAGEMENT AGENCY

NATIONAL FLOOD HAZARD MAP

National Flood Hazard Layer FIRMette

FEMA

122°31'9"W 37°52'43"N

122°30'31"W 37°52'14"N

Feet 1:6,000

0 250 500 1,000 1,500 2,000

Basemap: USGS National Map: Orthoimagery: Data refreshed October, 2020

Legend

SEE FIS REPORT FOR DETAILED LEGEND AND INDEX MAP FOR FIRM PANEL LAYOUT

SPECIAL FLOOD HAZARD AREAS
- Without Base Flood Elevation (BFE) *Zone A, V, A99*
- With BFE or Depth *Zone AE, AO, AH, VE, AR*
- Regulatory Floodway

OTHER AREAS OF FLOOD HAZARD
- 0.2% Annual Chance Flood Hazard, Areas of 1% annual chance flood with average depth less than one foot or with drainage areas of less than one square mile *Zone X*
- Future Conditions 1% Annual Chance Flood Hazard *Zone X*
- Area with Reduced Flood Risk due to Levee. See Notes. *Zone X*
- Area with Flood Risk due to Levee *Zone D*

OTHER AREAS
- NO SCREEN Area of Minimal Flood Hazard *Zone X*
- Effective LOMRs
- Area of Undetermined Flood Hazard *Zone D*

GENERAL STRUCTURES
- Channel, Culvert, or Storm Sewer
- Levee, Dike, or Floodwall

OTHER FEATURES
- 20.2 Cross Sections with 1% Annual Chance
- 17.5 Water Surface Elevation
- Coastal Transect
- Base Flood Elevation Line (BFE)
- Limit of Study
- Jurisdiction Boundary
- Coastal Transect Baseline
- Profile Baseline
- Hydrographic Feature

MAP PANELS
- Digital Data Available
- No Digital Data Available
- Unmapped

N

The pin displayed on the map is an approximate point selected by the user and does not represent an authoritative property location.

This map complies with FEMA's standards for the use of digital flood maps if it is not void as described below. The basemap shown complies with FEMA's basemap accuracy standards

The flood hazard information is derived directly from the authoritative NFHL web services provided by FEMA. This map was exported on 1/24/2023 at 5:55 PM and does not reflect changes or amendments subsequent to this date and time. The NFHL and effective information may change or become superseded by new data over time.

This map image is void if the one or more of the following map elements do not appear: basemap imagery, flood zone labels, legend, scale bar, map creation date, community identifiers, FIRM panel number, and FIRM effective date. Map images for unmapped and unmodernized areas cannot be used for regulatory purposes.

APPENDIX D

HISTORICAL RESEARCH DOCUMENTATION

APPENDIX D-1

MARIN COUNTY
COMMUNITY DEVELOPMENT AGENCY

Skip to main content

Public Record Requests

County of Marin, CA

Request Visibility: Unpublished

Request 23-11 Open

Dates

Received

January 4, 2023 via web

Requester

Hagop T.

hagop@kcematrixinc.com

1112 W. Burbank Blvd., Suite 301, Burbank, CA, 91506

8185595500

KCE Matrix, Inc. /Hagop T.

Staff Assigned

Departments

No departments assigned

Point of contact

Kerry Gerchow

Request

To: Marin County Building Department - Public Records

We would like to request copies of records related to site history, including historic and current permits applications, certificates of occupancy and violations for the following property:

825 Drake Avenue, Sausalito (Marin City), California 94965

Timeline Documents

Request Opened Public

Request received via web

Hagop Tatian

From: County of Marin CA Public Records <support@nextrequest.com>
Sent: Tuesday, January 17, 2023 1:59 PM
To: Hagop Tatian
Subject: [Document Released to Requester] County of Marin, CA public records request #23-11

-- Attach a non-image file and/or reply ABOVE THIS LINE with a message, and it will be sent to staff on this request. --

County of Marin, CA Public Records

Documents have been released for record request #23-11 along with the following message:

See attached.

- EP15-433, 825 Drake Ave, Marin City.pdf
- 825 Drake Ave Saus.doc
- 23-11 HAGPO-Responsive 1-17-23.pdf

View Request 23-11

https://marincountyca.nextrequest.com/requests/23-11

Document links are valid for one month. After February 17, you will need to sign in to view the document(s).

The All in One Records Requests Platform

Hagop Tatian

From: County of Marin CA Public Records <support@nextrequest.com>
Sent: Tuesday, January 17, 2023 1:59 PM
To: Hagop Tatian
Subject: Your County of Marin, CA public records request #23-11 has been closed.

-- Attach a non-image file and/or reply ABOVE THIS LINE with a message, and it will be sent to staff on this request. --

County of Marin, CA Public Records

Record request #23-11 has been closed.

View Request 23-11

https://marincountyca.nextrequest.com/requests/23-11

The All in One Records Requests Platform

Questions about your request? Reply to this email or sign in to contact staff at County of Marin, CA.

Technical support: See our help page

Too many emails? Change your email settings here

COUNTY OF MARIN

OFFICE OF THE
COUNTY COUNSEL

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COUNTY COUNSEL

Renee Giacomini Brewer
ASSISTANT COUNTY COUNSEL

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Colleen McGrath
ADMINISTRATIVE SERVICES
OFFICER

Marin County Civic Center
3501 Civic Center Drive
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415 473 6117 T
415 473 3796 F
415 473 2226 TTY
www.marincounty.org/cl

January 17, 2023

VIA NEXTREQUEST ONLY

Hagpo T.
KCE Matrix, Inc. /Hagop T.
1112 W. Burbank Blvd., Suite 301, Burbank, CA, 91506
hagop@kcematrixinc.com

Re: Public Records Act Request dated January 4, 2023
File No. 23-11

Dear Requestor,

My office represents the County of Marin. We are in receipt of your Public Records Act (PRA) request, dated January 4, 2023. Below is your request with a corresponding response.

Requests: We would like to request copies of records related to site history, including historic and current permits applications, certificates of occupancy and violations for the following property:

825 Drake Avenue, Sausalito (Marin City), California 94965

Response to Request: All records responsive to your request are enclosed.

Additional records from Community Development Agency are available to the public via the following link:
https://www.marincounty.org/depts/cd/customer-service/records-search

If you need any further assistance, please do not hesitate to contact me directly.

Sincerely,

Brandon Halter
Deputy County Counsel

No. 15-433
Area: Marin City

County of Marin
OFFICE OF ROAD COMMISSIONER

ENCROACHMENT PERMIT

TO: Village Baptist Church
825 Drake Avenue
Marin City , CA 94965

Issue Date June 25, 2015

In compliance with your request of June 21, 2015, and subject to all the terms, conditions and restriction written or printed as General Provisions and Special Conditions on any part of this form and referenced attachments, **PERMISSION IS HEREBY GRANTED TO**:

Replace 8-inch wide section of sidewalk.

At: 825 Drake Avenue, Marin City

All work shall be done in accordance with attached condition(s): (General Provisions, 100, 105)

and the following Special Condition(s):

1. Material shall not be placed within nine feet of the center of the pavement, or left in the right-of-way overnight. Leave no open trenches after working hours.
2. During working hours one traffic lane, under adequate flagger control, shall be maintained in all directions. At all other times all traffic lanes shall be kept open. All traffic control shall be per the Manual on Uniform Traffic Control Devices (MUTCD) standards.
3. Contractor shall call Underground Service Alert (800) 642-2444 at least 72 hours prior to any trenching work to have underground utilities marked. This permit is not valid unless applicant has been provided an initial inquiry identification number pursuant to GC Section 4216.2.
4. The use of "cut-back" asphalt will not be permitted as temporary trench paving. It is required to utilize trench plates or hot mix AC.
5. Contact John Semerad at (415) 473-2830 for final inspection.

This permit shall be considered void unless the work herein contemplated shall have been completed before August 1, 2015.

RAUL M. ROJAS
MARIN COUNTY ROAD COMMISSIONER

A.P.# ROW

B.P. # _____

Deputy

c: Office, L. Lewis, Sheriff Watch Commander Rm. 145, MC Fire Dispatch, CHP

Department of Public Works, Marin County Civic Center, Room 304
PO Box 4186, San Rafael, CA 94913 Phone (415)473-6549 Fax (415)473-3799

County of Marin
Department of Public Works
OFFICE OF THE ROAD COMMISSIONER
ENCROACHMENT PERMIT - GENERAL PROVISIONS

1. PERMIT TO BE KEPT AT WORK SITE. This permit shall be kept at the site of the work and must be shown to any representative of the Public Works Department (DPW) or any law enforcement officer on demand.

2. NOTICE PRIOR TO STARTING WORK. Before starting work, on which an inspector is required or whenever stated on the face of this permit, the permittee shall notify DPW. Such notice shall be given at least 24 hours in advance of the date work is to begin.

3. PROTECTION OF TRAFFIC. Adequate provision shall be made for the protection of the traveling public. Wherever necessary, barricades shall be placed with red lights or flares at night, flag persons employed, and any other necessary measures as may be required by the particular work in progress.

   The accessible pedestrian path of travel and related accessibility features must be maintained at all times or an alternate accessible temporary pedestrian path of travel must be provided around work zones. Accessible features must also be maintained during road closures.

4. MINIMUM INTERFERENCE WITH TRAFFIC. All work shall be planned and carried out so that there will be the least possible inconvenience to the traveling public. All traffic controls shall be in accordance with the Manual of Uniform Traffic Control Devices (MUTCD) standards. Traffic delays shall not exceed 3 minutes. At a minimum, one traffic lane under adequate flagger control shall be maintained during working hours. If construction operations create significant traffic congestion as determined by DPW, the hours of operation or traffic control requirements may be modified by DPW.

5. STORAGE OF MATERIAL. No material shall be stored within eight (8) feet of the edge of pavement or traveled way or within the shoulder line where the shoulders are wider than eight (8) feet. Any storage of equipment or machinery within the public road right of way will require prior consent of DPW.

6. CARE OF DRAINAGE. If the work herein contemplated shall interfere with the established drainage, ample provision shall be made by the permittee to provide for it as may be directed by DPW.

7. CLEAN UP OF RIGHT-OF-WAY. Upon completion of work, all brush, timber, scraps and other leftover construction materials and refuse shall be entirely removed and the right-of-way restored to a condition at least as presentable as that existing prior to the start of work.

8. DAMAGE TO RIGHT-OF-WAY IMPROVEMENTS. Any damage to the existing roadway, structures or survey monuments due to construction operations under this permit shall be restored to original condition by the permittee. Shoulder areas shall be redressed, drainage ditches shall be restored to original grades, and all dirt and debris resulting from permittee's operations shall be removed from the construction area. Any trees damaged as a result of construction operations shall be removed or restorative measures taken at permittee's expense as directed by DPW.

9. SURVEY MONUMENTS. The permittee shall take all measures necessary to identify, mark and preserve survey monuments. In the event that a monument is disturbed, permittee shall immediately notify DPW and perform any necessary repairs.

10. SUBMIT LOCATION PLAN. Upon completion of underground or surface work of consequence, the permittee shall furnish an as-built plan if requested by DPW.

11. STANDARDS OF CONSTRUCTION. All work shall conform to recognized standards of construction. Permittee shall comply with all "Uniform Construction Standards" drawings adopted May 2008, and "Standard Specifications Cities & County of Marin adopted June 1992. Copies of referenced documents can be found at - http://www.marincounty.org/depts/pw/divisions/land-use

12. SUPERVISION OF AGENCY. All work shall be done subject to the supervision of and to the satisfaction of DPW.

13. DEFINITION. This permit is issued under Code Section 13.12 of the County of Marin. The term encroachment is used in this permit as defined in Section 660, Sub. B of the Streets & Highways Code of the State of California. This permit does not authorize, and it shall not be construed as authorizing, any infringement upon the highway referred to herein or as affecting property rights of others thereto.

14. ACCEPTANCE OF PROVISIONS. It is understood and agreed by the permittee that the performance of any work under this permit shall constitute an acceptance of the provisions.

15. NO PRECEDENT ESTABLISHED. This permit is granted with the understanding that this action is not to be considered as establishing any precedent on the question of the expediency of permitting any certain kind of encroachment to be erected within the right-of-way of County roads.

16. FUTURE MOVING ON INSTALLATION. It is understood by the permittee that whenever construction, reconstruction or maintenance work on the highway may require, the installation provided for herein shall, upon request of DPW, be removed within a reasonable period of time as approved by DPW and at the sole expense of the permittee.

17. PERMITS FROM OTHER AGENCIES. The party or parties to whom this permit is issued shall, whenever required by law, secure the written order or consent to any work hereunder from the State of California Public Utilities Commission or any other public board having jurisdiction. This permit shall be suspended in operation unless and until such order or consent is obtained.

18. LIABILITIES FOR DAMAGES. The permittee is responsible for all liability imposed by law for personal injury or property damage which may arise out of work herein permitted, or which may arise out of failure on the permittee's part to perform his obligations under this permit in respect to maintenance. In the event any such liability is made against the County of Marin or any department, officer or employee thereof, permittee shall defend, indemnify and hold them and each of them harmless from such claim. Nothing herein is intended to impose on permittee any different or higher standard of care than that required by law. This permit shall not be effective for any purpose unless and until the above named permittee files with DPW a safety bond in the form and amount required by said department if stated on the face hereof. The requirement that a bond be filed does not apply in the event the permittee is a governmental board, which derives its revenue by taxation, or any public agency or public utility having lawful authority to occupy the highway.

19. MAKING REPAIRS. If DPW shall so select, repairs to paving or other improvements or facilities, which have been disturbed, shall be made by employees of DPW and the expenses therefore shall be borne by the permittee. All payment to laborers, inspectors, etc., employed by DPW for or on account of the work herein contemplated shall be made by said permittee forthwith on receipt of written orders, payrolls or vouchers approved by DPW. Alternatively, DPW may elect to require a deposit before starting repairs in an amount sufficient to cover the estimated cost thereof.

    DPW will give reasonable notice of its election to make such repairs. If DPW does not so elect, the permittee shall make such repairs promptly. In every case the permittee shall be responsible for restoring any portion of the highway which has been excavated or otherwise disturbed to its former condition as nearly as may be possible except where DPW elects to make repairs to paving as above provided in this paragraph and except where provisions to the contrary are made elsewhere in the permit.

20. MAINTENANCE. The permittee or his assignee of interest agrees by the acceptance of this permit to exercise reasonable care to maintain properly any encroachment placed by it in the highway and to exercise reasonable care in inspecting for and immediately repairing and making good any injury to any portion of the highway which occurs as a result of the maintenance of the encroachment in the highway or as a result of the work done under this permit, including any and all injuries to the highway which would not have occurred had such work not been done or such encroachment not placed therein.

21. INTEGRATED PEST MANAGEMENT: The contractor shall be required to strictly adhere to the guidelines established in the County of Marin's Integrated Pest Management (IPM) Ordinance 3521 and Policy, approved by the Board of Supervisors on July 21, 2009. Additional information regarding IPM policy, ordinance 3521, program, resources and requirements is available at the following website. http://www.co.marin.ca.us/depts/AG/Main/IPM/ipmprogramhome.cfm and Marin County Code Section 23.19.

    The contractor and applicant shall note that all pesticide applications, regardless of material used, must be approved by the IPM Coordinator prior to use at any facility covered by the contract. Material for weed eradication and pest control shall be only those listed in the County of Marin's approved list and categories III and IV herbicides, non-corrosive, non-staining, and shall not leave a flammable residue. Pesticides shall be EPA and California Department of Agriculture approved and used in strict accordance with manufacturer's label, recommendations, Federal, State, and local laws. Chemical application must use least toxic methods and be used as the last resort and only with written approval. Failure to comply with the Marin County IPM Ordinance & Policy may result in penalties as described in the ordinance.

22. CONFLICTING ENCROACHMENTS: Permittee shall yield start of work to ongoing, prior authorized, work adjacent to or within the limits of the project site. When existing encroachments conflict with new work, the permittee shall bear all cost for rearrangements, (e.g. relocation, alteration, removal, etc.)

1. EXISTING CONCRETE SHALL BE REMOVED AT EXPANSION OR WEAKENED PLANE JOINTS OR AT SAWCUTS AS FIELD MARKED BY AGENCY ENGINEER. SAWCUTS MUST GO ENTIRELY THROUGH CONCRETE.

2. FOR NEW DEVELOPMENT, NO UTILITY BOXES OR POLES WILL BE PERMITTED IN THE SIDEWALK AREA WITHOUT THE PRIOR WRITTEN APPROVAL OF THE AGENCY ENGINEER.

3. WHERE UNDERCUT SUBGRADE OR UNSUITABLE SUBGRADE MATERIAL IS ENCOUNTERED, THE AGENCY ENGINEER MAY REQUIRE REMEDIAL WORK TO BE DONE, INCLUDING OVER EXCAVATION AND BACKFILLING WITH CRUSHED ROCK AND, WHEN DIRECTED BY THE ENGINEER, PLACING GEOTEXTILE FABRIC BENEATH THE NEW CONCRETE SECTION.

4. SUBGRADE SHALL BE COMPACTED TO AT LEAST 95% RELATIVE COMPACTION IN THE TOP SIX INCHES.

5. NEW WORK SHALL MATCH EXISTING AS CLOSELY AS POSSIBLE IN FINISH, SCORING AND COLOR. FOR NEW INSTALLATIONS PLACED ADJACENT TO EXISTING, 2LB. DAVIS BLACK #8084 (OR EQUIVALENT) PER CU. YD. CONCRETE SHALL BE ADDED TO MIX.

6. EXCEPT WHERE SPECIFIED OTHERWISE HEREIN, NO ADMIXTURES SHALL BE USED WITHOUT THE PERMISSION OF THE AGENCY ENGINEER.

7. FORMS SHALL MEET GRADE AND FORM FACES SHALL NOT VARY FROM THE DIMENSIONS SHOWN BY MORE THAN 1/2 INCH.

8. NO CONCRETE SHALL BE PLACED UNTIL THE AGENCY ENGINEER HAS INSPECTED AND APPROVED FORMS AND SUBGRADE/BASE.

9. SUBGRADE/BASE SHALL BE THOROUGHLY WETTED IMMEDIATELY PRIOR TO PLACING CONCRETE.

10. CONCRETE SHALL BE A MINIMUM CLASS B (5 SACK MIX) WITH 1 INCH MAXIMUM AGGREGATE FROM AN APPROVED MIXING PLANT. NO BAGGED MIX IS PERMITTED.

11. CONCRETE SHALL HAVE A SLUMP OF NOT MORE THAN FOUR INCHES.

12. FOR SIDEWALKS AND DRIVEWAY APPROACHES, 1/4 INCH DEEP SCORE LINES SHALL BE PLACED AT FOUR FEET ON CENTER OR AS DIRECTED BY THE AGENCY ENGINEER.

13. WEAKENED PLANE JOINTS AT LEAST 3/4" DEEP SHALL BE PLACED AT A MINIMUM 16 FEET ON CENTER EXCEPT FOR SIDEWALKS AND DRIVEWAY APPROACHES WHICH SHALL BE A MINIMUM 5 FEET ON CENTER.

14. 3/8 INCH THICK EXPANSION JOINTS SHALL BE PLACED ON BOTH SIDES OF DRIVEWAY APPROACHES, AT CURB AND SIDEWALK RETURN POINTS, DRAINAGE STRUCTURES AND OTHER LOCATIONS AS SHOWN ON THE PLANS.

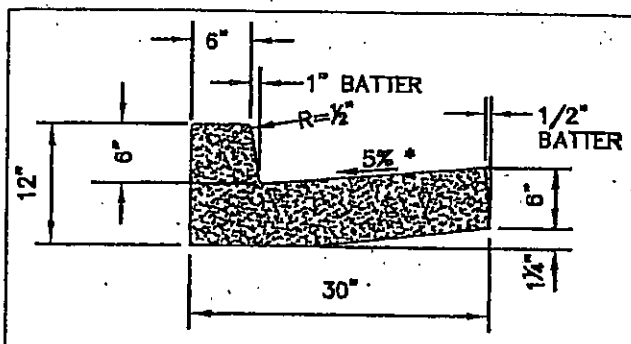
15. ALL EXPOSED EDGES SHALL BE ROUNDED WITH 1/2 INCH RADIUS TOOL.

16. ALL FLAT SURFACES SHALL BE LIGHT BROOM FINISHED UNLESS OTHERWISE SPECIFIED BY AGENCY ENGINEER.

17. CURBS, SIDEWALKS AND DRIVEWAY APPROACHES SHALL HAVE FORMS REMOVED AND BE BACKFILLED WITHIN SEVEN DAYS AFTER POURING.

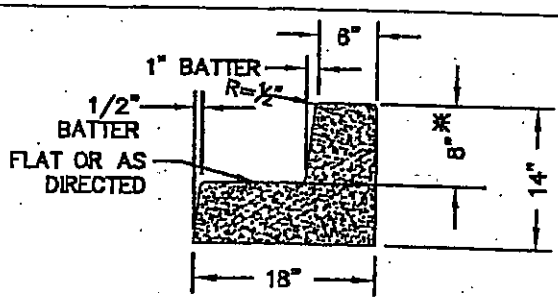
18. THE DESIGNATED DIMENSIONS AND SLOPES MAYBE MODIFIED TO ACCOMMODATE EXISTING ADJACENT FACILITIES SUBJECT TO THE APPROVAL OF THE AGENCY ENGINEER.

UNIFORM STANDARDS ALL CITIES AND COUNTY OF MARIN	REQUIREMENTS FOR CONCRETE CURB, GUTTER, SIDEWALK, DRIVEWAY AND OTHER "FLATWORK"				MAY 2008
					DWG. NO. 100
		REV.	DATE	BY	

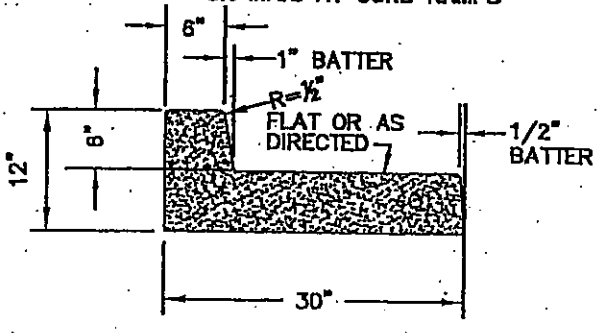


TYPE "A" CURB

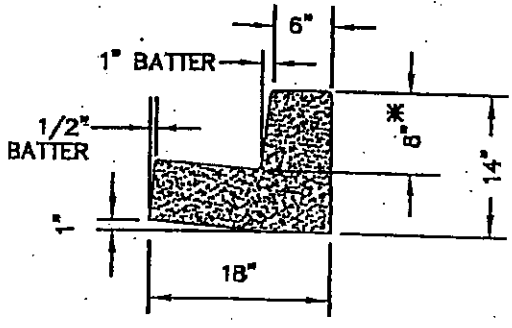
* 3% MAX. AT CURB RAMPS



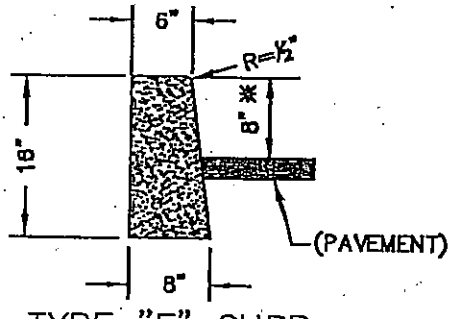
TYPE "B" CURB



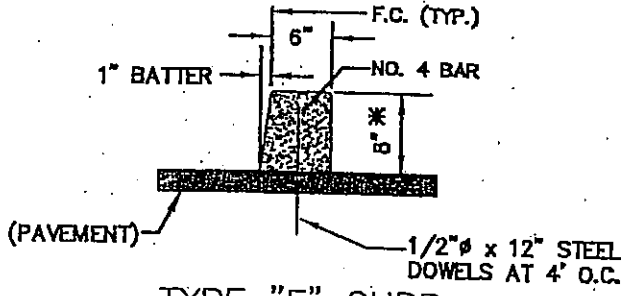
TYPE "C" CURB



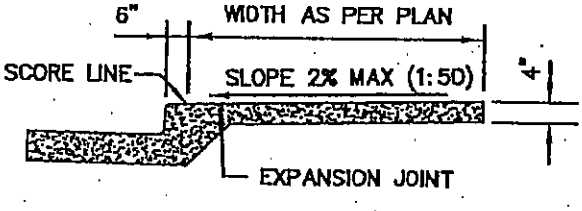
TYPE "D" CURB



TYPE "E" CURB

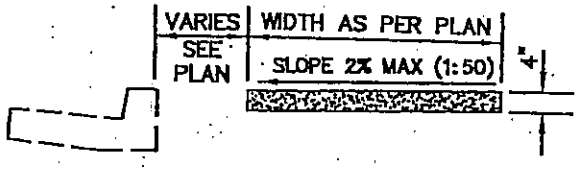


TYPE "F" CURB



TYPE "A" SIDEWALK

POUR CURB & GUTTER SEPARATELY FROM SIDEWALK



TYPE "B" SIDEWALK

POURED SEPARATE FROM CURB

NOTES:

1. SEE DRAWING NO. 100 FOR GENERAL REQUIREMENTS.
2. * 8" CURB HEIGHT UNLESS 6" HEIGHT APPROVED BY AGENCY ENGINEER.

UNIFORM STANDARDS ALL CITIES AND COUNTY OF MARIN	CURB, GUTTER AND SIDEWALK DETAILS		MAY 2008
			DWG. NO. 105
		REV. DATE BY	

lit:\Standards\County Standards (UCS)\2008 Updated County Standards

☐ City of Belvedere
☐ City of Larkspur
☐ City of Mill Valley
☐ City of Novato
☐ City of San Rafael *
☐ City of Sausalito
☐ Town of Ross
☐ Town of Fairfax
☐ Town of Corte Madera
☐ Town of San Anselmo
☐ Town of Tiburon
☐ County of Marin

EP No: 15-433 A / B

DPW '15 JUN 22 AM 9:40

UNIFIED APPLICATION FOR ENCROACHMENT PERMIT

APPLICATION DATE: 6/21/15 APN: - -

LOCATION OF WORK OR ENCROACHMENT: 825 (No.) DRAKE AVE. (Street) MARIN CITY (City/Township) CA. 94965

CROSS STREET: PARK CR. ESTIMATED COST: $ 4500

STARTING DATE: 6/22/15 COMPLETION DATE: 6/23/15

PROPERTY OWNER'S NAME AND ADDRESS (If Different from Applicant):

THE UNDERSIGNED HEREBY APPLIES FOR PERMISSION TO PERFORM THE FOLLOWING DESCRIBED WORK AND/OR OTHERWISE ENCROACH ON A LOCAL AGENCY RIGHT-OF-WAY (ROW):

DESCRIPTION OF WORK OR ENCROACHMENT (Include plans or sketch):

Check all that apply to the project and provide a written description:

☐ Driveway Approach ☒ Sidewalk ☐ Accessible Ramp ☐ Debris Box
☐ Curb & Gutter ☐ Water Service ☐ New Utilities ☐ Special Event
☐ Sewer Improvement ☐ Excavation ☐ Landscaping ☐ Other (Describe)

Describe: REMOVE GRASS 8" WIDE OPENING IN CONCRETE SIDEWALK FORM AND POUR QUICK SETTING CONCRETE TO FILL OPENING FINISH TO MATCH EXISTING. APPROXIMATE 1 CF. MATERIAL

Road Surface Type: ☐ Asphalt ☒ Concrete ☐ Other:

Trenching Work: ☐ Yes ☐ No Linear Feet: 4'-6" Surface Thickness: 4 TO 6"

Traffic Control Plan: ☐ Yes ☒ No

Applicant agrees that all work will be performed in accordance with the rules, regulations and standards of the Local Agency Department of Public Works and any Local Municipal Code. All work shall be subject to inspection and approval by the Department of Public Works. Applicant shall indemnify, defend and hold the Local Agency, its officers, agents and employees harmless from any and all claims, suits or liability, including, but not limited to, litigation costs and attorney's fees which the Local Agency may incur as the result of any and all claims and suits for personal injury, property damage or inverse condemnation by reason of applicants placement of/or maintenance of encroachments authorized by this permit. No work shall commence until permit is issued.

APPLICANT'S NAME / COMPANY (PLEASE PRINT): DEACON ALVIS ALLEN SR.

CONTRACTOR'S NAME: MAINTENANCE MANGER. Contractor License No:

APPLICANT'S MAILING ADDRESS: 825 DRAKE AVE. MARIN CITY CA. 94965

AGENCY: VILLAGE BAPTIST CHURCH

CONTACT NUMBERS: 415 332-2100 (Daytime Phone) (Fax) (Email)

APPLICANT'S SIGNATURE: Alvis A.

For Agency Use Only

Accepted By:

Insurance on file? ☐ Yes ☐ No

Road Moratorium? ☐ Yes ☐ No

Final Insp. Cleared: ☐

Receipt #:

Fees:
Application:
Plan Review & Inspection:
Total:

* Contact City of San Rafael Public Works for Specific Encroachment Permit Application

Revised May 2005

Encroachment Permit Conditions

- ☐ Construction Standard(s): _____
- ☐ General Conditions: _____
- ☐ Comprehensive General Liability insurance in amounts not less than $1,000,000 combined single limit applying to bodily injury, personal injury and property damage are required.
- ☐ Additional Insured Endorsement: The local agency must be named as an additionally insured on a separate endorsement sheet that modifies the general liability policy.
- ☐ Contact local Police Department, Fire Department, and Parking Services prior to start of work.
- ☐ The Contractor shall maintain local access and provide emergency vehicle access at all times.
- ☐ Compaction test is required and shall be submitted to local Public Works Department.
- ☐ Provide a traffic control plan per the Manual on Uniform Traffic Control Devices (MUTCD).
- ☐ Provide safe pedestrian and wheelchair access, per ADA and State requirements, during construction.
- ☐ All work shall be performed between the hours of _____ and _____.
- ☐ Please contact _____ prior to start of work and for final inspection.
- ☐ Planning review required: YES / NO
- ☐ Special Conditions: _____

Encroachment Permit Approval

Approved By: _____ Date: _____

Inspected By: _____ Date: _____

Sent Certified

January 24, 2023

Village Baptist Church of Marin City
825 Drake Ave
Sausalito, CA 94965

RE: Damaged sidewalk fronting 825 Drake Ave, Sausalito
APN: 052-112-03

Dear Property Owner(s):

It has come to the attention of the Department of Public Works (DPW) that portions of sidewalk along the frontage of 825 Drake Ave have uplifted, cracked and buckled and constitutes a pedestrian hazard and accessibility barrier.

The California Streets and Highways Code, Sections 5610 through 5614 states that owners of properties in such a condition should repair the sidewalk so as to not endanger or inconvenience the public. You should be aware that you might be liable for damages or injuries resulting from this condition.

Accordingly, you must make arrangements to repair the sidewalk. An Encroachment Permit application for this work is enclosed for your convenience. Please sign and return the application to this department within 10 days of the date of this letter. The permit fee is waived for sidewalk repairs. Upon issuance of the permit you will be allowed 30 days to make the required repairs. Coordinate the necessary improvements with all utilities.

Please contact me at (415) 473-2830 should you need clarification of the sidewalk panels in need of repair, or have any further questions. I will be out of the office and will be returning on Dec. 30, 2014; in my absence you may call (415) 473 – 3755.

Sincerely,

John Semerad
Engineering Assistant

c: B. Campagna

File A 6749

COUNTY OF MARIN DEPARTMENT OF PUBLIC WORKS

BUILDING INSPECTION DIVISION / BUILDING PERMIT APPLICATION

BUILDING PERMIT	A 11342	DATE	9/11/70
OCCUPANCY		TYPE CONST.	
		GROUP	
OWNER	Village Baptist Church		
JOB ADDRESS	Drake & Park Circle	LOT	150
NEAREST CROSS ST.		BLOCK	
LOCALITY	Marin City	TRACT	
CONTRACTOR	Congregation		
ADDRESS	P.O. Box 13		
POST OFFICE	Marin City		
TELEPHONE NO.	332 3944	STATE LICENSE	

ZONING INFORMATION

ASSESSOR'S PARCEL NO.: 52-112-01

NUMBER OF STORIES

TOTAL HEIGHT

MAXIMUM ROOF OVERHANG INTO SETBACK

MAXIMUM DECK PROJECTION INTO SETBACK

DISTANCE TO PROPERTY LINES

	FRONT	REAR	SIDE	SIDE
SUBMITTED				
REQUIRED				

REMARKS

BUILDING INSPECTION RECORD

TYPE		DATE	INSPECTOR
FOUNDATION	☐		
SLABS	☐		
FRAME	☐		
INT. LATH	☐		
EXT. LATH	☐		
MASONRY WALLS	☐		
FIREPLACE	☐		
MISC.	☐		

Reinstated.

APPROVED: MARIN COUNTY PLANNING DEPARTMENT

BY: DATE

REMARKS: SEWER ☐ SEPTIC TANK ☐

FINAL ☐ BBB 4/1/71

SIGNATURE OF APPLICANT	[signature]	LIVEABLE AREA	
OWNER'S ADDRESS		CHIEF BLDG INSP. APPROVED BY	[signature]
OWNER		ISSUED BY	CL

VALUATION $	1/2 Fee	
PERMIT FEE	$ 88	25
CHECKING FEE		
TOTAL FEE	88	25

COUNTY OF MARIN DEPARTMENT OF PUBLIC WORKS

BUILDING INSPECTION DIVISION BUILDING PERMIT APPLICATION

BUILDING PERMIT	A-6749	DATE	10-28-65 ~~9-13-65~~
OCCUPANCY	CHURCH	TYPE CONST.	CHURCH
		GROUP	C
OWNER	Village Baptist Church		
JOB ADDRESS	DRAKE & Park Circle	LOT	150
NEAREST CROSS ST.		BLOCK	
LOCALITY	MARIN CITY, CALIF	TRACT	
CONTRACTOR	CONGREGATION		
ADDRESS	P.O. Box 13		
POST OFFICE	MARIN CITY		
TELEPHONE NO.	332-3944	STATE LICENSE	

ZONING INFORMATION

ASSESSOR'S PARCEL NO.:	52-112-01
NUMBER OF STORIES	2
TOTAL HEIGHT	18'
MAXIMUM ROOF OVERHANG INTO SETBACK	4½'
MAXIMUM DECK PROJECTION INTO SETBACK	

DISTANCE TO PROPERTY LINES

	FRONT	REAR	SIDE	SIDE
SUBMITTED	228	24'	S 40'	N 42'
REQUIRED				

REMARKS

Nil. No handrails
stairwells not sealed off
9/30/69

BUILDING INSPECTION RECORD

TYPE		DATE	INSPECTOR
FOUNDATION	☐	11/30/65	[signature]
SLABS	☐		
FRAME *	✓		
INT. LATH	☐		
EXT. LATH	☐		
MASONRY WALLS	X	3/4/66	[signature]
FIREPLACE	☐		
MISC.	☐		

APPROVED: MARIN COUNTY PLANNING DEPARTMENT

BY: [signature] DATE 9/13/65

REMARKS: * BM/ frame for 1st Floor 7/11/66 SEWER ☐ SEPTIC TANK ☐

FINAL [signature] 4/1/71

SIGNATURE OF APPLICANT	[signature]	LIVABLE AREA	
OWNER'S ADDRESS	P.O. Box 13 Marin City	CHIEF BLDG. INSP. APPROVED BY	Henry Wr
OWNER		ISSUED BY	[signature]

VALUATION	$74,000.00	
PERMIT FEE	$ 176	50
Paid 9-17-65 CHECKING FEE	88	25
TOTAL FEE	$264	75

COUNTY OF MARIN DEPARTMENT OF PUBLIC WORKS

BUILDING INSPECTION DIVISION HEATING PERMIT APPLICATION

BUILDING PERMIT NO.	A6749	DATE	3-6-70
HEATING PERMIT NO.	38973		
OCCUPANCY		GROUP	
OWNER	VILLAGE BAPTIST CHURCH	LOT	150
JOB ADDRESS	825 DRAKE Ave - MARIN CITY	BLOCK	
NEAREST CROSS ST.	DRAKE & PARK CIRCLE	TRACT	
LOCALITY			
HEATING CONTRACTOR	~~ED Colver & O Conner~~ owner		
ADDRESS			
POST OFFICE	1		
TEL. NO.		STATE LICENSE NO.	

HEATING INSPECTION RECORD

TYPE		DATE	INSPECTOR
UNDER FLOOR	☐		
ROUGH S/M WORK	☑		
FLUES & VENTS	☑		
GAS OUTLETS	☑		
FURNACE	☑		
MISC.	☐		

REMARKS:

OVER ☐

FINAL HEATING ☐ [illegible] 4/1/71

SIGNATURE OF APPLICANT Samuel L. Banks Jr.

OWNER VILLAGE BAPTIST CHURCH

ITEM	NO.	RATE EA.	$	¢
ISSUING PERMIT	1		2	00
GAS OR OIL PIPING OUTLETS				
(MINIMUM $1.50)		.50		
FURNACE OR HTG. APPLIANCE 300,000 BTU	1	1.50	2	00
GAS VENTS (MINIMUM $1.00)	1	.50		50
HOT OR COLD AIR OUTLETS		.50		
DUCT FOR DOMESTIC HOOD	*	.50		
KITCHEN OR BATHROOM VENTS	2	.50	1	00
COMMERCIAL RANGE HOOD	1	5.00	5	00
DUCT NOT INCLUDED WITH HOOD		1.00		
FAN OR BLOWER NOT INCLUDED WITH HOOD		1.00		
FIRE DAMPER FIRST FIVE / OVER FIVE		1.00 / .50		
METAL FIREPLACE & FLUE		2.50		
BARBECUE HOOD & FLUE		2.50		
FAN OR BLOWER FOR THE ABOVE HOOD, OR PAT. FLUE		1.00		
INDUSTRIAL VENTILATING SYSTEM, EACH POWER UNIT		4.00		
COMMERCIAL INCINERATOR		5.00		
MISC. SEE FEE SCHEDULE				
TOTAL FEE →			10	50
CORRECTED TOTAL FEE →				
ISSUED BY: [illegible]				

File A6749 COUNTY OF MARIN DEPARTMENT OF PUBLIC WORKS

BUILDING INSPECTION DIVISION ELECTRICAL PERMIT APPLICATION

BUILDING PERMIT	A 11342	DATE	9/11/70
ELECTRICAL PERMIT	40113	TYPE CONST.	
OCCUPANCY		GROUP	
OWNER	Village Baptist Church		
JOB ADDRESS	Drake Ave at Park Circle	LOT	
NEAREST CROSS ST.		BLOCK	
LOCALITY	Marin City	TRACT	
ELECTRICAL CONTRACTOR	Rich Electric Inc		
ADDRESS	110 Carlos Drive San Rafael		
POST OFFICE			
TELEPHONE NO.	479 4814	STATE LICENSE	

ELECTRICAL INSPECTION RECORD

TYPE		DATE	INSPECTOR
UNDER FLOOR	☐		
ROOF	☐		
ROUGH	☐		
TEMP. POLE	☐		
SERVICE	☐		
MISC.	☐		

REMARKS:

FINAL ☑ [signature] 4/1/71

SIGNATURE OF APPLICANT [signature]

OWNER

ITEM	NO.	RATE EA.	FEE	
ISSUING PERMIT			$2	00
LIGHTING OUTLET		.20		
SWITCHES		.20		
RECEPTACLES 115 VOLT		.20		
LIGHTING FIXTURES		.20		
RANGES		1.00		
BUILT-IN OVENS		1.00		
BUILT-IN RANGE TOPS		1.00		
DOMESTIC HEATERS		1.00		
DISHWASHERS		1.00		
DISPOSAL UNITS		1.00		
HOOD FAN & LIGHT		1.00		
FURNACE MOTOR & CONTROLS		1.00		
CIRCUITS		.25		
TEMPORARY POLE		2.50		
SERVICE CHANGE UP TO 100 AMP.		2.50		
SERVICE UP TO 100 AMP.		2.50		
MISC.				
Reinstated Refer to				
MINIMUM FEE		5.00		
34927 LIVING AREA				
DWELLINGS $1.00/100 SQ. FT. SQ. FT.				
APARTMENTS $1.00/100 SQ. FT. SQ.				
TOTAL FEE			21	25
CORRECTED TOTAL FEE				
ISSUED BY				

COUNTY OF MARIN DEPARTMENT OF PUBLIC WORKS

BUILDING INSPECTION DIVISION ELECTRICAL PERMIT APPLICATION

BUILDING PERMIT A6749 — DATE 3/7/68
ELECTRICAL PERMIT 34927 — TYPE CONST.
OCCUPANCY — GROUP
OWNER Village Baptist Church
JOB ADDRESS Drake Ave & Bric Circle — LOT
NEAREST CROSS ST. — BLOCK
LOCALITY Marin City — TRACT
ELECTRICAL CONTRACTOR Rich Electric Inc
ADDRESS 110 Carlos Drive San Rafael
POST OFFICE
TELEPHONE NO. 479 4814 — STATE LICENSE

ELECTRICAL INSPECTION RECORD

TYPE		DATE	INSPECTOR
UNDER FLOOR	☐		
ROOF	☐	5-5-66	Peter Duran
ROUGH Ptl.	☑	7-11-66	
TEMP. POLE	☐		
SERVICE	☐		
MISC.	☐		

REMARKS: Permits cover both roof offices. needs checked by final. Fee $5.00 MIN FEE

FINAL 8/15/71
SIGNATURE OF APPLICANT Richard Brooks

ITEM	NO.	RATE EA.	FEE
ISSUING PERMIT			$2 00
LIGHTING OUTLET	74	.10	7 40
SWITCHES	30	.10	3 00
RECEPTACLES 115 VOLT	45	.10	4 50
LIGHTING FIXTURES	74	.15	11 10
RANGES	1	.50	50
BUILT-IN OVENS		.50	
BUILT-IN RANGE TOPS		.50	
DOMESTIC HEATERS		.50	
DISHWASHERS		.50	
DISPOSAL UNITS		.50	
HOOD FAN & LIGHT		.50	
FURNACE MOTOR & CONTROLS	1	.50	50
CIRCUITS	44	.25	11 —
TEMPORARY POLE		2.50	
SERVICE CHANGE UP TO 100 AMP.		2.50	
SERVICE UP TO 100 AMP.		2.50	2 50
MISC.			
LIVING AREA			
DWELLINGS $1.00/100 SQ. FT. SQ. FT.			
APARTMENTS $1.00/100 SQ. FT. SQ. FT.			
TOTAL FEE			
CORRECTED TOTAL FEE			42 50

OWNER — ISSUED BY: Check to come down from Village Baptist Church

9-14-65

Department of Public Works
BUILDING INSPECTION DEPARTMENT

SITE CHECK REPORT

Owner Village Baptist Church Contractor

Job Address Drake Ave + Park Circle

Identification: Lot Stakes ✓ Identifying Sign

DRIVEWAY: Encroachment Permit Required yes CD-1

Curb & Gutter exist Swale no

Culvert (Size) no Profile Required no

Remarks Std Dlw Approach

GRADING: Grading Plan Required no Engineered Design no

Retaining Wall Required no Erosion Control planting on all slopes

Remarks lay back all cuts to 1½ to 1. and all fill slopes to 2:1

FOUNDATION: On Natural Ground yes Deep Piers Needed no

On Compacted Fill no

Remarks All footings shall extend to orig. ground or certification of fill to 90% compaction req'd.

DRAINAGE: Subdrains Needed per plan (weep holes)

Interception of Surface Drainage ok

Disposition of Roof Drainage ok

Flume or Pipe Needed no 88.25

SEWAGE DISPOSAL BY: Marin City Sausalito San Dist. 21.25

Leaching Field 5.

114.50

INSPECTED BY J. Chamberlin APVD. BY JSC Date 9-20-65

Transmitted to Bldg. Insp. Dept. By

Date

COUNTY OF MARIN DEPARTMENT OF PUBLIC WORKS

BUILDING INSPECTION DIVISION PLUMBING PERMIT APPLICATION

BUILDING PERMIT NO. A-6749 DATE 12-8-65

PLUMBING PERMIT NO. 2995

OCCUPANCY GROUP

OWNER Village Baptist Church

JOB ADDRESS Drake Avenue LOT

NEAREST CROSS ST. Park Circle BLOCK

LOCALITY Marin City TRACT

PLUMBING CONTRACTOR E. M. Culver

ADDRESS 230 Woodland Ave

POST OFFICE San Rafael

TEL. NO. 454-1358 STATE LICENSE NO. 30379

PLUMBING INSPECTION RECORD

TYPE	DATE	INSPECTOR
UNDER FLOOR	12-20-65	Wiersma
HEAT. PIPING UNDER FLOOR ☐		
ROUGH PLUMBING ☑	1-20-66	Wiersma
ROUGH GAS PIPING ☐		
BOILER ☐		
MISC. ☐		

REMARKS:

OVER ☐

FINAL PLUMBING & GAS ☑ 10-1-69 Wiersma

SIGNATURE OF APPLICANT E. M. Culver

OWNER

ITEM	NO.	RATE EA.	$	¢
ISSUING PERMIT			2	00
DOMESTIC WATER HEATERS	1	1.50	1	50
BATH TUBS OR SHOWERS		1.50		
BASINS (LAVORATORIES)	2	1.50	3	00
WATER CLOSETS	3	1.50	4	50
KITCHEN OR OTHER SINKS	2	1.50	3	00
AUTO. WASHERS OR FLOOR DRAINS	2	1.50	3	00
REPLACEMENT OF FIXTURES		1.50		
REPLACEMENT OF PIPING OR SOIL LINES		1.50		
GAS OR OIL PIPING (UP TO 5 OUTLETS $1.50) OVER FIVE	2	.30	1	50
WATER DRAIN PIPING	1	1.50	1	50
RAIN WATER SYSTEM PER DRAIN		2.00		
2" - 3" GAS OR WATER PIPING		5.00		
3" - 6" GAS OR WATER PIPING		10.00		
STEAM OR HOT WATER BOILERS	1	2.00	2	00
STEAM OR HOT WATER RADIATORS	4	.50	2	00
RADIANT HEAT EACH 100 SQ. FT.		.50		
PRIVATE SWIMMING POOL PIPING		5.00		
MISC. SEE FEE SCHEDULE				
1 GAS VENT			1	50
TOTAL FEE				
CORRECTED TOTAL FEE			25	50
ISSUED BY:				

COUNTY OF MARIN DEPARTMENT OF PUBLIC WORKS

BUILDING INSPECTION DIVISION ELECTRICAL PERMIT APPLICATION

BUILDING PERMIT	A-6749	DATE	12-77-65
ELECTRICAL PERMIT	✓ 30081	TYPE CONST.	Church
OCCUPANCY		GROUP	
OWNER	Village Baptist Church		
JOB ADDRESS	DRAKE Ave at Park Circle	LOT	150
NEAREST CROSS ST.		BLOCK	
LOCALITY	Marin City	TRACT	
ELECTRICAL CONTRACTOR	Walter Thompson		
ADDRESS			
POST OFFICE			
TELEPHONE NO.		STATE LICENSE	

ELECTRICAL INSPECTION RECORD

TYPE		DATE	INSPECTOR
UNDER FLOOR	☐		
ROOF	☐		
ROUGH	☐		
TEMP. POLE	☑	12/11/61	[signature]
SERVICE	☐		
MISC.	☐		

REMARKS:

FINAL ☐

SIGNATURE OF APPLICANT [signature]

OWNER

ITEM	NO.	RATE EA.	FEE	
ISSUING PERMIT	✓		$1	50
LIGHTING OUTLET		.10		
SWITCHES		.10		
RECEPTACLES 115 VOLT		.10		
LIGHTING FIXTURES		.15		
RANGES		.50		
BUILT-IN OVENS		.50		
BUILT-IN RANGE TOPS		.50		
DOMESTIC HEATERS		.50		
DISHWASHERS		.50		
DISPOSAL UNITS		.50		
HOOD FAN & LIGHT		.50		
FURNACE MOTOR & CONTROLS		.50		
CIRCUITS		.25		
TEMPORARY POLE	✓	1.50	1	50
SERVICE CHANGE UP TO 100 AMP.		1.50		
SERVICE UP TO 100 AMP.		1.50		
MISC.				
LIVING AREA				
DWELLINGS $1.00/100 SQ. FT.	SQ. FT.			
APARTMENTS $1.25/100 SQ. FT.	SQ. FT.			
TOTAL FEE →			3	
CORRECTED TOTAL FEE →				

ISSUED BY: [signature]

File A 6749

COUNTY OF MARIN DEPARTMENT OF PUBLIC WORKS

BUILDING INSPECTION DIVISION ELECTRICAL PERMIT APPLICATION

BUILDING PERMIT	A 11342	DATE	9/11/70
ELECTRICAL PERMIT	40112	TYPE CONST.	
OCCUPANCY		GROUP	
OWNER	Village Baptist Church		
JOB ADDRESS	Drake Ave at Park Circle	LOT	150
NEAREST CROSS ST.		BLOCK	
LOCALITY	Marin City	TRACT	
ELECTRICAL CONTRACTOR	Walter Thompson		
ADDRESS			
POST OFFICE			
TELEPHONE NO.		STATE LICENSE	

ELECTRICAL INSPECTION RECORD

TYPE		DATE	INSPECTOR
UNDER FLOOR	☐		
ROOF	☐		
ROUGH	☐		
TEMP. POLE	☑	9/22/70	Wolfe
SERVICE	☐		

MISC. Pole not secure

REMARKS: Pole need additional brace and ground around pole and existing brace needs compaction 9-14-70 Marion

FINAL ☐

SIGNATURE OF APPLICANT [signature]

OWNER

ITEM	NO.	RATE EA.	FEE
ISSUING PERMIT			$2 00
LIGHTING OUTLET		.20	
SWITCHES		.20	
RECEPTACLES 115 VOLT		.20	
LIGHTING FIXTURES		.20	
RANGES		1.00	
BUILT-IN OVENS		1.00	
BUILT-IN RANGE TOPS		1.00	
DOMESTIC HEATERS		1.00	
DISHWASHERS		1.00	
DISPOSAL UNITS		1.00	
HOOD FAN & LIGHT		1.00	
FURNACE MOTOR & CONTROLS		1.00	
CIRCUITS		.25	
TEMPORARY POLE	✓	2.50	
SERVICE CHANGE UP TO 100 AMP.		2.50	
SERVICE UP TO 100 AMP.		2.50	
MISC.			
Reinstated			
MINIMUM FEE		5.00	
LIVING AREA			
DWELLINGS $1.00/100 SQ. FT. SQ. FT.			
APARTMENTS $1.00/100 SQ. FT. SQ. FT.			
TOTAL FEE →			5 00
CORRECTED TOTAL FEE →			
ISSUED BY: [initials]			

119808

Permit #	119808	06/27/2008	**COUNTY OF MARIN**	052-112-03 **Pin Chkr**	SRA
Owner	VILLAGE BAPTIST CHURCH OF M C				
Address	825 DRAKE AVE SAUSALITO CA 94965				
Contractor	OWNER	**Phone #** 987-6498	**Location** 825 DRAKE AVE MARIN CITY		
Address			**Nearest Cross Street** PARK CIRCLE		
License #	Class:	**Phone #**	**Valuation** 1,000	TEMPORARY MODULAR BUILDING F	

Building	Insp	Date	Electrical	Insp	Date	Plumbing	Insp	Date	Mechanical	Insp	Date
101 Setbacks			201 Temp Pole			301 Und Grnd DWV	DA	8/11/08	401 Und Grnd Mech		
102 Footings			**202 Serv Grnd**			302 Und Grnd Water					
103 Fndn Walls			203 Und Grnd Elec			303 Und Grnd Gas					
104 Piers											
105 Grd Bms											
106 Pool Stl			**206 Pool Bndg**			**306 Und Pool Plbg**					
107 Ret Wl Ftg			207 Und Pool								
108 Ret Wl Stl											
109 Masonry											
110 Slab/Memb			**210 Und Slab Elec**			**310 Und Slab Plbg**			**410 Und Slab Mech**		
111 Pre Deck			214 Und Deck						411 Hydronic Piping		
120 Und Fl Frmg			**220 Und Fl Elec**			**320 Und Fl DWV**			**420 Und Fl Mech**		
121 Und Fl Insul						321 Und Fl Water	DA	8/20/08			
122 F/P Ftg						322 Und Fl Gas					
130 Roof Nail			230 Roof Elec			330 Roof Fire Sp					
131 Roof Insul											
132 Shear Nail											
133 F/P Thrt											
140 Framing			**240 Rough Elec**			**340 Rough Plbg**			**440 Rough Mech**		
141 F/P Chimn						341 Rough Gas			441 Rough Flues		
142 Drop Ceiling						342 Rgh Fire Sp			442 Air Ducts		
151 Wall Insul						343 Shw Pan					
152 Ceil Insul									470 Mfg Frpl Hrth		
160 Pool Fence									480 Free Std Stove		
170 Sheetrock			280 Elec Serv			380 Gas Serv			481 Boiler		
171 Lath						381 Water Htr			482 Chimney		
172 Scr Coat						382 Pool Piping			483 Furnace		
173 Pool Plstr			**273 Pool Elec**			**383 Pool Htr**			484 Air Cond		
Per WH			Per WH			Per WH					
199 Final	JVS	10/7/08	**299 Final**	JVS	10/7/08	**399 Final**	JVS	10/7/08	**499 Final**		

DATE	INSPECTOR	COMMENTS

LICENSED CONTRACTORS DECLARATION

I hereby affirm that I am licensed under provisions of Chapter 9 (commencing with Section 7000 of Division 3 of the Business and Professionals Code and my license is in full force and effect.

License Class _____ Lic. No. _____

Contractor _____ Date _____

OWNER-BUILDER DECLARATION

I hereby affirm that I am exempt from the Contractor's License for the following reason (Sec. 7031.5, Business and Professions Code. Any city or county which requires a permit to construct, alter, improve, demolish, or repair any structure, prior to its issuance, also require the applicant for such permit to file a signed statement that he/she is licensed pursuant to the provisions of the Contractor's License Law (Chapter 9 (commencing with Section 7000) of Division 3 of the Business and Professions Code) or that he is exempt therefrom and the basis for the alleged exemption. Any violation of Section 7031.5 by any application for a permit subjects the applicant to a civil penalty of not more than five hundred dollars ($500).):

☒ I, as owner of the property, or my employees with wages as their sole compensation, will do the work, and the structure is not intended or offered for sale (Sec. 7044. Business and Professions Code: The Contractor's License Law does not apply to an owner of property who buys or improves thereon, and who does such work himself or through his employees, provided that such improvements are not intended or offered for sale. If, however, the building or improvement is sold within one year of completion, the owner/builder will have the burden of proof that he did not build or improve for the purpose of sale).

☐ I, as owner of the property, am exclusively contracting with licensed contractors to construct the project (Sec. 7044, Business Professions Code: The Contractor's License Law does not apply to an owner of property who builds or improves thereon, and who contracts for such projects with a contractor(s) licensed pursuant to the Contractor's License Law.).

☐ I am exempt under Sec. 7044, B.&P.C. for this reason:

Owner Emmanuel Q. Akognon Date 4-7-08

WORKERS' COMPENSATION DECLARATION

I hereby affirm under penalty of perjury one of the following declarations:

☒ I have and will maintain a certificate of consent to self-insure for workers' compensation, as provided for by Section 3700 of the Labor Code, for the performance of the work for which this permit is issued.

☒ I have and will maintain workers' compensation insurance, as required by Section 3700 of the Labor Code, for the performance of the work for which this permit is issued. My workers' compensation insurance and carrier are:

Carrier Guide One Insurance Company

Policy Number 1260-325

(This section does not need to be completed if the permit is for one hundred ($100) or less)

☐ I certify that in the performance of the work for which this permit is issued, I shall not employ any person in any manner so as to become subject to the workers' compensation laws of California, and agree that if I should become subject to the workers' compensation provisions of Section 3700 of the Labor Code, I shall forthwith comply with those provisions.

Date 4-7-08 Applicant Emmanuel Q. Akognon

WARNING: Failure to secure workers' compensation coverage is unlawful, and shall subject an employer to criminal penalties and civil fines up to one hundred thousand dollars ($100,000). In addition to the cost of compensation, damages as provided for in Section 3706 of the Labor Code, interest, and attorney's fees.

CONSTRUCTION LENDING AGENCY

I hereby affirm that there is a construction lending agency for the performance of the work for which this permit is issued (Sec. 3 Civ.C.).

Lender's Name N/A

FOR APPLICANT TO FILL IN

ADDRESS OF PROJECT 825 DRAKE AVENUE, M. CITY

CROSS STREET PARK CIRCLE, MARIN CITY

LOCALITY MARIN CITY (RICHARDSON BAY)

ASSESSOR PARCEL NO. 052-112-03 NO. OF UNITS N/A

OWNER REV. EMMANUEL AKOGNON (VILLAGE BAPTIST)

ADDRESS 825 DRAKE AVENUE TEL (415) 987-6498

CITY MARIN CITY STATE CA ZIP 94965

TENANTS NAME AND PHONE

CONTRACTOR ~~OWNER~~ owner LIC.#

ADDRESS TEL.

CITY STATE ZIP

ARCHITECT/ DESIGNER Hendin Jones Arch. LIC.# C4381

ADDRESS 480 Gate Five Road TEL 415-331-2538

CITY Sausalito STATE CA ZIP 94965

ENGINEER Pacific Consulting Eng. LIC.# 17918

ADDRESS 2150 Bell Avenue TEL 916-564-6028

CITY Sacramento STATE CA ZIP 95838

DESCRIPTION OF WORK
INSTALLATION OF TEMPORARY MOBILE MODULAR BUILDING FOR CHURCH WORSHIP

OCCUP. GROUP TYPE CONSTRUCTION MODULAR # of STORIES 1

USE OF STRUCTURE WORSHIP CENTER SPRINKLERS ☐ YES ☐ NO

TYPE OF WORK NEW ☒ REMODEL ☐ ADD ☐ CONVERSION ☐ REPAIR ☐

1ST FLOOR AREA	2,136 S.F.	# OF BDR	Ø	# OF BA	2
2ND FLOOR AREA	N/A S.F.	# OF BDR	N/A	# OF BA	N/A
3RD FLOOR AREA	N/A S.F.	# OF BDR	N/A	# OF BA	N/A
TOTAL AREA	2,136 S.F.	TOTAL BDR	N/A	TOTAL BA	2
AREA OF ADDITION	N/A S.F.	GARAGE/CARPORT AREA	N/A		S.F.
AREA OF RMDL	N/A S.F.	DECKS			S.F.

I certify that I have read this application and state that the above information is correct. I agree to comply with all county ordinances and state laws relating to building construction, and hereby authorize representatives of the County to enter upon the above mentioned property for inspection purposes.

I (We) agree to save, indemnify and keep harmless the County of Marin against liabilities, judgements, costs and expenses which may in any way accrue against said County in consequence of the granting of this permit.

Emmanuel Q. Akognon — Signature of Applicant - Owner/Contractor

4-7-08 — Date

MARIN COUNTY
COMMUNITY DEVELOPMENT AGENCY
BUILDING & SAFETY DIVISION
3501 Civic Center Drive, Room 308
San Rafael, CA 94903
Telephone 415-499-6550 FAX 415-499-7432
24 hour Inspection Recorder 415-499-6560

BUILDING PERMIT APPLICATION

DEPARTMENT USE ONLY

PROCEDURE	BY	DATE
Plans Received		4/9/08
Contractor's Lic. Verified		4/9/08
Comp Cert. Verified/Waived		4/21/08

PERMIT NUMBER 19808

DATE ISSUED 6/23/08

FEE VALUATION

CONTRACT 1,000

REQUIREMENTS

DEPARTMENT	APPROVED BY	DATE
Environmental Health		
Land Development	BRD	6-4-08
Water		
Planning	CG	4/9/08

ZONING

PLANNING NOTES
UP 08-14 A/C 2/14/08

BUILDING INSPECTION NOTES

RECEIVED
APR 16 2008
~~MARIN COUNTY PUBLIC WORKS~~

PERMIT FEES

		AMOUNT
BWOP ☐		
Permit Fee		82.95
Plan Check Fees	Recpt #	93.62
Zoning Fee	Recpt #	205
Insulation Fee	Recpt #	
Investigation Fee	Recpt #	
Environmental Health		
State Fee		.50
Electrical Permit Fee		79
Mechanical Permit Fee		
Plumbing Permit Fee		79
Site & Encroachment Permit Fees		270
Road Impact Fee		
Planning Surcharge		39.95
C&D Fee		50.00
Other Hook-up		128
Procces Fee 48.34	BAL DUE	726.10
Final - Electrical (299)		
Final - Mechanical (499)		
Final - Plumbing (399)		
Final - Building (199)		

APPLICATION EXPIRES IN 365 DAYS IF PERMIT IS NOT ISSUED. PERMIT EXPIRES IN 365 DAYS AFTER ISSUANCE OF PERMIT. M.C.C. 19.04.050

PART II

Senate Bill No. 986
Effective 9/27/81

OWNER-BUILDER INFORMATION

AN APPLICATION FOR A BUILDING PERMIT HAS BEEN SUBMITTED IN YOUR NAME LISTING YOURSELF AS THE BUILDER OF THE PROPERTY IMPROVEMENTS SPECIFIED.

FOR YOUR PROTECTION YOU SHOULD BE AWARE THAT AS "OWNER-BUILDER" YOU ARE THE RESPONSIBLE PARTY OF RECORD ON SUCH A PERMIT. BUILDING PERMITS ARE NOT REQUIRED TO BE SIGNED BY PROPERTY OWNERS UNLESS THEY ARE PERSONALLY PERFORMING THEIR OWN WORK. IF YOUR WORK IS BEING PERFORMED BY SOMEONE OTHER THAN YOURSELF, YOU MAY PROTECT YOURSELF FROM POSSIBLE LIABILITY IF THAT PERSON APPLIES FOR THE PROPER PERMIT IN HIS OR HER NAME.

CONTRACTORS ARE REQUIRED BY LAW TO BE LICENSED AND BONDED BY THE STATE OF CA. AND TO HAVE A BUSINESS LICENSE FROM THE CITY OR COUNTY. THEY ARE ALSO REQUIRED BY LAW TO PUT THEIR LICENSE NUMBER ON ALL PERMITS FOR WHICH THEY APPLY.

IF YOU PLAN TO DO YOUR OWN WORK, WITH THE EXCEPTION OF VARIOUS TRADES THAT YOU PLAN TO SUBCONTRACT, YOU SHOULD BE AWARE OF THE FOLLOWING INFORMATION FOR YOUR BENEFIT AND PROTECTION:

IF YOU EMPLOY OR OTHERWISE ENGAGE ANY PERSONS OTHER THAN YOUR IMMEDIATE FAMILY, AND THE WORK (INCLUDING MATERIALS AND OTHER COSTS) IS $200.00 OR MORE FOR THE ENTIRE PROJECT, AND SUCH PERSONS ARE NOT LICENSED AS CONTRACTORS OR SUBCONTRACTORS, THEN YOU MAY BE AN EMPLOYER.

IF YOU ARE AN EMPLOYER, YOU MUST REGISTER WITH THE STATE AND FEDERAL GOVERNMENT AS AN EMPLOYER AND YOU ARE SUBJECT TO SEVERAL OBLIGATIONS INCLUDING STATE AND FEDERAL INCOME TAX WITHHOLDING, FEDERAL SOCIAL SECURITY TAXES, WORKERS' COMPENSATION INSURANCE, DISABILITY INSURANCE COSTS, AND UNEMPLOYMENT COMPENSATION CONTRIBUTIONS. THERE MAY BE FINANCIAL RISKS FOR YOU IF YOU DO NOT CARRY OUT THESE OBLIGATIONS, AND THESE RISKS ARE ESPECIALLY SERIOUS WITH RESPECT TO WORKERS' COMPENSATION INSURANCE.

FOR MORE SPECIFIC INFORMATION ABOUT YOUR OBLIGATIONS UNDER FEDERAL LAW, CONTACT THE INTERNAL REVENUE SERVICE (AND, IF YOU WISH, THE U.S. SMALL BUSINESS ADMINISTRATION). FOR MORE SPECIFIC INFORMATION ABOUT YOUR OBLIGATIONS UNDER STATE LAW, CONTACT THE DEPARTMENT OF BENEFIT PAYMENTS AND THE DIVISION OF INDUSTRIAL ACCIDENTS.

IF THE STRUCTURE IS INTENDED FOR SALE, PROPERTY OWNERS WHO ARE NOT LICENSED CONTRACTORS ARE ALLOWED TO PERFORM THEIR WORK PERSONALLY OR THROUGH THEIR OWN EMPLOYEES, WITHOUT A LICENSED CONTRACTOR OR SUBCONTRACTOR, ONLY UNDER LIMITED CONDITIONS.

A FREQUENT PRACTICE OF UNLICENSED PERSONS PROFESSING TO BE CONTRACTORS IS TO SECURE AN "OWNER-BUILDER" BUILDING PERMIT, ERRONEOUSLY IMPLYING THAT THE PROPERTY OWNER IS PROVIDING HIS OR HER OWN LABOR AND MATERIAL PERSONALLY. BUILDING PERMITS ARE NOT REQUIRED TO BE SIGNED BY PROPERTY OWNERS UNLESS THEY ARE PERFORMING THEIR OWN WORK PERSONALLY.

INFORMATION ABOUT LICENSED CONTRACTORS MAY BE OBTAINED BY CONTACTING THE CONTRACTORS' STATE LICENSE BOARD IN YOUR COMMUNITY OR AT 1020 N ST., SACRAMENTO, CA 95814.

PLEASE COMPLETE AND RETURN THE ENCLOSED OWNER-BUILDER VERIFICATION FORM SO THAT WE CAN CONFIRM THAT YOU ARE AWARE OF THESE MATTERS.

THE BUILDING PERMIT WILL NOT BE ISSUED UNTIL THE VERIFICATION IS RETURNED

Marin County Community Development Agency
Building & Safety
3501 Civic Center Drive, Room 308
San Rafael, CA 94903

OWNER-BUILDER VERIFICATION

WHEN NOT A LICENSED CONTRACTOR AS CONTRACTOR PERMITTEE

ATTENTION PROPERTY OWNER:

AN OWNER-BUILDER BUILDING PERMIT HAS BEEN APPLIED FOR IN YOUR NAME AND BEARING YOUR SIGNATURE.

1. I PERSONALLY PLAN TO PROVIDE THE MAJOR LABOR AND MATERIALS FOR CONSTRUCTION OF THE PROPOSED PROPERTY IMPROVEMENT (YES OR NO) YES.
2. I (HAVE/~~HAVE NOT~~) HAVE SIGNED AN APPLICATION FOR A BUILDING PERMIT FOR THE PROPOSED WORK.
3. I HAVE CONTRACTED WITH THE FOLLOWING PERSON (FIRM) TO PROVIDE THE PROPOSED CONSTRUCTION:

   NAME MODULAR ALREADY CONSTRUCTED

   ADDRESS _____ CITY _____

   PHONE _____ CONTRACTOR'S LICENSE NO. _____
4. I PLAN TO PROVIDE PORTIONS OF THE WORK, BUT I HAVE HIRED THE FOLLOWING PERSON TO COORDINATE, SUPERVISE, AND PROVIDE THE MAJOR WORK:

   NAME Cosco Fire Protection Company

   ADDRESS 240 South Vasco Road CITY Livermore, CA 94551

   PHONE 925-580-1540 CONTRACTOR'S LICENSE NO. C16-577671
5. I WILL PROVIDE SOME OF THE WORK BUT I HAVE CONTRACTED (HIRED) THE FOLLOWING PERSONS TO PROVIDE THE WORK INDICATED:

NAME	ADDRESS	PHONE	TYPE OF WORK

SIGNATURE PROPERTY OWNER Emmanuel O. Akeynon DATE 8-25-08

AP NO. 52-112-01

MARIN COUNTY ZONING AND LAND DEVELOPMENT REPORT

Address: 825 Drake Ave, Marin City A.P. #: 052-112-03 Zoning: RMP-3

			Yes	Date
☐	New Principal Structure	DR/DM/DX #	☐	
☐	New Accessory Structure	Use Permit # 08-14	☒	2/14/08
☐	Addition	Variance #	☐	
☐	Interior Work Only	Coastal Exclusion	☐	
☐	Pool/Hot Tub	Coastal Permit #	☐	
☒	Other Temp. Structure	Other	☐	

	Principal		Accessory		PROJECTIONS		
	Required	Submitted	Required	Submitted	Principal	Maximum	Submitted
Min. Lot Area/Max. Density			N/A		Roof		
Setbacks: Front (min.)					Decks		
Side					Other		
Side							
Corner: Side					Accessory	Maximum	Submitted
Rear					Roof		
Height (max.)					Decks		
FAR (max. %/sq. ft.)					Other		

Planning Hold: _____

Remarks: Plans in substantial conformance w/ approved Exhibits, UP 08-14

Approved By: _____ Date: 4/9/08

Access:

Encroachment Permit required for driveway: ☐ Yes ☒ No

☐ Recorded ☐ Standard

Remarks: No improvements in the R.O.W.

Frontage Improvements required: _____

Remarks: _____

Grading: per plan

☐ Under direction of Soils/Design Engineer

☐ To be certified in writing by Soils/Design Engineer

Foundation:

☒ On Natural Ground

☐ Deep Piers Needed

☐ On Compacted Fill

Remarks: per plan

☐ Site retaining wall construction shall be certified in writing by the Design Engineer

Drainage:

☒ Away from foundation

☐ Roof drains shall be connected to a drainage system

☐ Site drainage shall be inspected and certified in writing by the Project Soils/Drainage Engineer

Remarks: MAINTAIN EXISTING DRAINAGE PATTERNS

Additional Requirements:

1. All required improvements shall be completed prior to calling for Final Inspection.
2. Any street cuts in a County maintained road must have encroachment permits.
3. Call Department of Public Works at (415) 499-6549 at least 48 hours in advance for inspections.
4. Parking Notes:

*FINAL DPW ENGINEER SHALL INSPECT DISABLED PATH OF TRAVEL PRIOR TO FINAL

Hold DPW: ☒ Yes ☐ No

☒ ~~Framing~~ FINAL

☐ Occupancy

☐ Prior to placing baserock, the driveway grade must be approved by DPW engineer

Hold Flood Control: ☐ Yes ☒ No

Special Flood Hazard Zone: C

Inspected By: John P Thiele Date: 5/19/08 Approved By: _____ Date: _____

Sanitary District No. _____ Septic System: _____ Approved By: _____ Date: _____

MARIN COUNTY ZONING AND LAND DEVELOPMENT REPORT

Address: 825 Drake Ave, Marin City A.P. #: 052-112-03 Zoning: RMP-3

		Yes	Date
☐	New Principal Structure	☐	
☐	New Accessory Structure	☒	2/14/08
☐	Addition	☐	
☐	Interior Work Only	☐	
☐	Pool/Hot Tub	☐	
☒	Other Temp. Structure	☐	

DR/DM/DX #
Use Permit # 08-14
Variance #
Coastal Exclusion
Coastal Permit #
Other

	Principal		Accessory		PROJECTIONS		
	Required	Submitted	Required	Submitted	**Principal**	Maximum	Submitted
Min. Lot Area/Max. Density			N/A		Roof		
Setbacks: Front (min.)					Decks		
Side					Other		
Side							
Corner: Side					**Accessory**	Maximum	Submitted
Rear					Roof		
Height (max.)					Decks		
FAR (max. %/sq. ft.)					Other		

Planning Hold:
Remarks: Plans in substantial conformance w/ approved Exhibits, UP 08-14

Approved By: [signature] Date: 4/9/08

Access:
Encroachment Permit required for driveway: ☐ Yes ☐ No
☐ Recorded ☐ Standard
Remarks:
Frontage Improvements required:
Remarks:

Grading:
☐ Under direction of Soils/Design Engineer
☐ To be certified in writing by Soils/Design Engineer

Foundation:
☐ On Natural Ground
☐ Deep Piers Needed
☐ On Compacted Fill
Remarks:
☐ Site retaining wall construction shall be certified in writing by the Design Engineer

Drainage:
☐ Away from foundation
☐ Roof drains shall be connected to a drainage system
☐ Site drainage shall be inspected and certified in writing by the Project Soils/Drainage Engineer
Remarks: MAINTAIN

Additional Requirements:
1. All required improvements shall be completed prior to calling for Final Inspection.
2. Any street cuts in a County maintained road must have encroachment permits.
3. Call Department of Public Works at (415) 499-6549 at least 48 hours in advance for inspections.
4. Parking Notes:

Hold DPW: ☐ Yes ☐ No
☐ Framing
☐ Occupancy
☐ Prior to placing baserock, the driveway grade must be approved by DPW engineer

Hold Flood Control: ☐ Yes ☒ No
Special Flood Hazard Zone: C

Inspected By: Date: Approved By: Date:

Sanitary District No. Septic System: Approved By: Date:

3049:53

ACORD CERTIFICATE OF LIABILITY INSURANCE

DATE (MM/DD/YYYY) 06/25/08

PRODUCER (209) 883-4640
Ministry Pacific, LLC
3227 7th ST

Hughson, CA 95326

INSURED
Village Baptist Church
47 Manor View

FAIRFAX, 94930

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW.

INSURERS AFFORDING COVERAGE	NAIC #
INSURER A: GuideOne	
INSURER B:	
INSURER C:	
INSURER D:	
INSURER E:	

COVERAGES

THE POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED. NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS AND CONDITIONS OF SUCH POLICIES. AGGREGATE LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAIMS.

INSR LTR	ADD'L INSRD	TYPE OF INSURANCE	POLICY NUMBER	POLICY EFFECTIVE DATE (MM/DD/YY)	POLICY EXPIRATION DATE (MM/DD/YY)	LIMITS	
A		GENERAL LIABILITY ☑ COMMERCIAL GENERAL LIABILITY ☐ CLAIMS MADE ☑ OCCUR GEN'L AGGREGATE LIMIT APPLIES PER: ☑ POLICY ☐ PRO-JECT ☐ LOC	1260-324	11/15/07	11/15/08	EACH OCCURRENCE	$ 1,000,000
						DAMAGE TO RENTED PREMISES (Ea occurrence)	$ 1,000,000
						MED EXP (Any one person)	$ 5,000
						PERSONAL & ADV INJURY	$ 1,000,000
						GENERAL AGGREGATE	$ 3,000,000
						PRODUCTS - COMP/OP AGG	$ 3,000,000
		AUTOMOBILE LIABILITY ☐ ANY AUTO ☐ ALL OWNED AUTOS ☐ SCHEDULED AUTOS ☐ HIRED AUTOS ☐ NON-OWNED AUTOS				COMBINED SINGLE LIMIT (Ea accident)	$
						BODILY INJURY (Per person)	$
						BODILY INJURY (Per accident)	$
						PROPERTY DAMAGE (Per accident)	$
		GARAGE LIABILITY ☐ ANY AUTO				AUTO ONLY - EA ACCIDENT	$
						OTHER THAN AUTO ONLY: EA ACC	$
						AGG	$
		EXCESS/UMBRELLA LIABILITY ☐ OCCUR ☐ CLAIMS MADE ☐ DEDUCTIBLE ☐ RETENTION $				EACH OCCURRENCE	$
						AGGREGATE	$
							$
							$
							$
A		WORKERS COMPENSATION AND EMPLOYERS' LIABILITY ANY PROPRIETOR/PARTNER/EXECUTIVE OFFICER/MEMBER EXCLUDED? If yes, describe under SPECIAL PROVISIONS below	1280-325	11/15/07	11/15/08	☑ WC STATU-TORY LIMITS ☐ OTH-ER	
						E.L. EACH ACCIDENT	$ 1,000,000
						E.L. DISEASE - EA EMPLOYEE	$ 1,000,000
						E.L. DISEASE - POLICY LIMIT	$ 1,000,000
		OTHER					

DESCRIPTION OF OPERATIONS / LOCATIONS / VEHICLES / EXCLUSIONS ADDED BY ENDORSEMENT / SPECIAL PROVISIONS

CERTIFICATE HOLDER

CANCELLATION

SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, THE ISSUING INSURER WILL ENDEAVOR TO MAIL _____ DAYS WRITTEN NOTICE TO THE CERTIFICATE HOLDER NAMED TO THE LEFT, BUT FAILURE TO DO SO SHALL IMPOSE NO OBLIGATION OR LIABILITY OF ANY KIND UPON THE INSURER, ITS AGENTS OR REPRESENTATIVES.

AUTHORIZED REPRESENTATIVE

ACORD 25 (2001/08)

© ACORD CORPORATION 1988

VILLAGE BAPTIST CHURCH
825 Drake Avenue
Marin City, California 94965
www.villagebaptisthome.org (415)987-6498
The Rev. Dr. Emmanuel O. Akognon, Pastor/Teacher
Jesus Is Lord

MEMORANDUM
To: Marin County Building Department

The Village Baptist Church advisory board of the building team wishes to advise you of our desires regarding the temporary application for our modular building. We are submitting plans and specs for your approval and the issuance of all necessary permits to complete the work required to occupy this 60ft. by 36ft. temporary mobile modular building structure. This building will be used as a temporary worship center for our church as we pursue resources to help us construct a permanent building for our church activities.

We have provided all required information and or materials for the Marin County Planning Department. In February 2008, the Planning Department approved a use permit for size, color,

accessible seating and number of parking slots to be located on the existing church site.

Upon issuing the building permit, we will secure our support contractors such as electrical, plumbing, and paving.

We are already behind in our timeline for the start of our worship services in this temporary modular unit. We humbly ask your department for a speedy response to our application.

Thank you for your help in the past and we look forward to your assistance and help in this project.

Respectfully submitted,

Rev. Dr. Emmanuel O. Akognon, Pastor
Deacon Jonathan Matthews, Esq., Team Member
Deacon Alvis Allen, Sr., Project Manager

127025 825 Drake Ave, Marin City 6/25/2010

127025 06/25/2010 052-112-03 DB

VILLAGE BAPTIST CHURCH OF M C
825 DRAKE AVE SAUSALITO CA 94965
OWNER 707-799-2380

825 DRAKE AVE MARIN CITY
PARK CIRCLE

Class: 2,684 (13) WALKWAYS AND GUARD RAILS &

TO LAUNDRY @ L.F. @ U.F. @ CIRCLES DR & LOWER STAIRS AGT

Building	Insp	Date	Electrical	Insp	Date	Plumbing	Insp	Date	Mechanical	Insp	Date
101 Setbacks			201 Temp Pole			301 Und Grnd DWV			401 Und Grnd Mech		
102 Footings			**202 Serv Grnd**			302 Und Grnd Water					
103 Fndn Walls			203 Und Grnd Elec			303 Und Grnd Gas					
104 Piers	DA	7/6/10									
105 Grd Bms											
106 Pool Stl			**206 Pool Bndg**			**306 Und Pool Plbg**					
107 Ret Wl Ftg			207 Und Pool								
108 Ret Wl Stl											
109 Masonry											
110 Slab/Memb	DA	7/6/10	**210 Und Slab Elec**			**310 Und Slab Plbg**			**410 Und Slab Mech**		
111 Pre Deck			214 Und Deck						411 Hydronic Piping		
120 Und Fl Frmg			**220 Und Fl Elec**			**320 Und Fl DWV**			**420 Und Fl Mech**		
121 Und Fl Insul						321 Und Fl Water					
122 F/P Ftg						322 Und Fl Gas					
130 Roof Nail			230 Roof Elec			330 Roof Fire Sp					
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132 Shear Nail											
133 F/P Thrt											
140 Framing			**240 Rough Elec**			**340 Rough Plbg**			**440 Rough Mech**		
141 F/P Chimn						341 Rough Gas			441 Rough Flues		
142 Drop Ceiling						342 Rgh Fire Sp			442 Air Ducts		
151 Wall Insul						343 Shw Pan					
152 Ceil Insul									470 Mfg Frpl Hrth		
160 Pool Fence									480 Free Std Stove		
170 Sheetrock			280 Elec Serv			380 Gas Serv			481 Boiler		
171 Lath						381 Water Htr			482 Chimney		
172 Scr Coat						382 Pool Piping			483 Furnace		
173 Pool Plstr			**273 Pool Elec**			**383 Pool Htr**			484 Air Cond		
199 Final	DA	10/18/10	**299 Final**			**399 Final**			**499 Final**		

DATE	INSP'R	COMMENTS
9/29/10	DA	NO PLANS OR JOB CARD FOR FINAL

MARIN COUNTY
COMMUNITY DEVELOPMENT AGENCY
BRIAN C. CRAWFORD, DIRECTOR
WILLIAM KELLEY, CBO, DEPUTY DIRECTOR
BUILDING & SAFETY DIVISION

RECEIVED
JAN 05 2010
MARIN COUNTY
DEPARTMENT OF PUBLIC WORKS

Departments	Approved	Date
Planning	12/24/09	CM
Environmental Health		
Dept. of Public Works	MS	6.9.10 $ 1,471

Table above to be completed by County staff

site + EP
$1150 + 321 = 1471

CONSTRUCTION PERMIT APPLICATION

California Health and Safety Code Section 19825

Tracking # 57805

Permit Number: 127025 Plans Received: 12-29-09

Issued Date: 6/25/10 Zoning: RMP-3-4

#1 IDENTIFY YOUR BUILDING PROJECT

What is it you are trying to do? *Please describe ALL work to be performed under this building permit and the USE of the space or structure (additional space available on page 2)*

Project Includes:

1. Replace wooden walkway ramps/guardrails with ADA compliant wooden walkway/ guardrails.
2. Replace eroded concrete pad with ADA compliant concrete pad, steps and handrails.

MARIN COUNTY
DEPARTMENT OF PUBLIC WORKS
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RECEIVED

How much is this going to cost? *TOTAL contract amount or dollar value of all work to be performed under this permit*

Project Location

Address of Project	825 Drake Avenue		
City, State, Zip	Marin City, California 94965		
Locality		Nearest Cross Street	Park Circle
Assessor Parcel Number	052-112-03	Number of Units	25 units

Check all that apply:

- ☐ New Construction
- ☐ New Addition
- ☐ Change of Use/Conversion
- ☐ Remodel Existing
- ☐ Misc Improvement
- ☑ Repair Existing
- ☐ Code Enforcement Case

Project Data Table (please provide areas in square feet)

	Existing	Proposed		Existing	Proposed
1st Floor Area			Area of Addition		
2nd Floor Area		deck stairs	Area of ~~Remodel~~	16.00	30.00
3rd Floor Area			Area of Decks	214.00	214.00
Garage Floor Area			Total Area	230.00	244.00

Property Owner Contact Information:

Property Owner Information	Shola Akognon	Telephone	707.799.2380
Mailing Address	1011 Allen Street		
City, State, Zip	Petaluma, California 94954	Email	zabadoo3@gmail.com

Project Applicant Contact Information:

Licensed Design Professional in charge of project	Kam Yan	Telephone	510.562.0581
Address	433 Hegenberger Road, Suite 204		
City, State, Zip	Oakland, California 94621	Email	kam@kyase.com

Additional Information for Plan Review or Inspection Staff

Please use this space to provide important helpful information, difficult directions to job site, contact name and phone number for coordinating inspections, gate codes, etc.

Property Tenant Name and Phone Number (if applicable): Shola Akognon, Telephone: 707.799.2380

Intake Completeness Record: *(This area for CDA Use Only)*

Plans [ ] NR/NA Recd by _____ Date _____ **Lead cert** [ ] NR/NA Recd by _____ Date _____

Lic # Verified by _____ Date _____ **C&D form** [ ] NR/NA Recd by _____ Date _____

OB form Verified by _____ Date _____ **WComp** [ ] NR/NA Verified by _____ Date _____

Will Serve: water [ ] NR/NA Recd by _____ Date _____ **sewer** [ ] NR/NA Recd by _____ Date _____

Fire *(describe)* _____ Verified by _____ Date _____

School Fees *(describe)* _____ Verified by _____ Date _____

Other *(describe)* _____ Verified by _____ Date _____

#2 IDENTIFY WHO WILL PERFORM THE WORK (Complete *either* 2a *or* 2b)

This permit is to be issued in the name of the (_) Licensed Contractor or (☑) the Property Owner as the permit holder of record who will be responsible and liable for the construction. (check one)

2a – CALIFORNIA LICENSED CONTRACTOR'S DECLARATION
I hereby affirm under penalty of perjury that I am licensed under provisions of Chapter 9 (commencing with Section 7000) of Division 3 of the Business and Professions Code, and my license is in full force and effect.

Contractor Name: _____ Telephone Number_____

Mailing Address: _____

City, State, Zip: _____ Email Address: _____

License Class and No. _____ Contractor Signature _____

2b – OWNER-BUILDER'S DECLARATION
I hereby affirm under penalty of perjury that I am exempt from the Contractors' State License Law for the reason(s) indicated below by the checkmark(s) I have placed next to the applicable item(s) (Section 7031.5, Business and Professions Code: Any city or county that requires a permit to construct, alter, improve, demolish, or repair any structure, prior to its issuance, also requires the applicant for the permit to file a signed statement that he or she is licensed pursuant to the provisions of the Contractors' State License Law (Chapter 9 (commencing with Section 7000) of Division 3 of the Business and Professions Code) or that he or she is exempt from licensure and the basis for the alleged exemption. Any violation of Section 7031.5 by any applicant for a permit subjects the applicant to a civil penalty of not more than five hundred dollars ($500).):

(_) **I, as owner of the property, or my employees with wages as their sole compensation, will do (_) all of or (_) portions of the work,** and the structure is not intended or offered for sale (Section 7044, Business and Professions Code: The Contractors' State License Law does not apply to an owner of property who, through employees' or personal effort, builds or improves the property, provided that the improvements are not intended or offered for sale. If, however, the building or improvement is sold within one year of completion, the Owner-Builder will have the burden of proving that it was not built or improved for the purpose of sale.).

(☑) **I, as owner of the property, am exclusively contracting with licensed Contractors to construct the project** (Section 7044, Business and Professions Code: The Contractors' State License Law does not apply to an owner of property who builds or improves thereon, and who contracts for the projects with a licensed Contractor pursuant to the Contractors' State License Law.).
(_) **I am exempt from licensure under the Contractors' State License Law for the following reason:**

_____

By my signature below I acknowledge that, except for my personal residence in which I must have resided for at least one year prior to completion of the improvements covered by this permit, I cannot legally sell a structure that I have built as an owner-builder if it has not been constructed in its entirety by licensed contractors. I understand that a copy of the applicable law, Section 7044 of the Business and Professions Code, is available upon request when this application is submitted or at the following Web site: http://www.leginfo.ca.gov/calaw.html.

Property Owner or Authorized Agent signature Linda Rogers Date November 26, 2009

#3 IDENTIFY WORKERS' COMPENSTATION COVERAGE AND LENDING AGENCY

WARNING: **FAILURE TO SECURE WORKERS' COMPENSATION COVERAGE IS UNLAWFUL, AND SHALL SUBJECT AN EMPLOYER TO CRIMINAL PENALTIES AND CIVIL FINES UP TO ONE HUNDRED THOUSAND DOLLARS ($100,000), IN ADDITION TO THE COST OF COMPENSATION, DAMAGES AS PROVIDED FOR IN SECTION 3706 OF THE LABOR CODE, INTEREST, AND ATTORNEY'S FEES.**

WORKERS' COMPENSATION DECLARATION
I hereby affirm under penalty of perjury one of the following declarations:

(_) **I have and will maintain a certificate of consent to self-insure for workers' compensation, issued by the Director of Industrial Relations** as provided for by Section 3700 of the Labor Code, for the performance of the work for which this permit is issued. Policy No. _____

(_) **I have and will maintain workers' compensation insurance,** as required by Section 3700 of the Labor Code, for the performance of the work for which this permit is issued. My workers' compensation insurance carrier and policy number are:
Carrier_____ Policy No_____ Expiration Date_____

Name of Agent _____ Tel No _____

(X) **I certify that, in the performance of the work for which this permit is issued, I shall not employ any person in any manner so as to become subject to the workers' compensation laws of California,** and agree that, if I should become subject to the workers' compensation provisions of Section 3700 of the Labor Code, I shall forthwith comply with those provisions.

DECLARATION REGARDING CONSTRUCTION LENDING AGENCY
I hereby affirm under penalty of perjury that there is a construction lending agency for the performance of the work for which this permit is issued (Section 3097, Civil Code).

Lender's Name and Address California Housing Finance Agency, 1415 L Street, Suite 500
Sacramento, CA 95814, Telephone: 877-9-CALHFA (877.922.5432)

#4 DECLARATION BY CONSTRUCTION PERMIT APPLICANT

By my signature below, I certify to each of the following:

I am (_) a California licensed contractor or (X) the property owner* or (_) authorized to act on the property owner's behalf.**

- I have read this CONSTRUCTION PERMIT APPLICATION and the information I have provided is correct.
- I agree to comply with all applicable city and county ordinances and state laws relating to building construction.
- I authorize representatives of this city or county to enter the above-identified property for inspection purposes.
- I recognize this CONSTRUCTION PERMIT APPLICATION expires in 365 days if permit is not issued.
- I agree to save, indemnify and keep harmless the County of Marin against liabilities, judgments, costs and expenses which may in any way accrue against said County in consequence of the granting of this permit.

**requires separate verification form*
***requires separate authorization form*

California Licensed Contractor, Property Owner* or Authorized Agent**:

Signature _____ Date November 26, 2009

MARIN COUNTY
COMMUNITY DEVELOPMENT AGENCY
BRIAN C. CRAWFORD, DIRECTOR
WILLIAM KELLEY, CBO, DEPUTY DIRECTOR
BUILDING & SAFETY DIVISION

PROPERTY OWNER'S PACKAGE

Disclosures & Forms for Owner-Builders Applying for Construction Permits

***IMPORTANT!* NOTICE TO PROPERTY OWNER** *(CA Health and Safety Code Section 19825)*

Dear Property Owner:

An application for a building permit has been submitted in your name listing yourself as the builder of the property improvements specified at _____.

We are providing you with an Owner-Builder Acknowledgment and Information Verification Form to make you aware of your responsibilities and possible risk you may incur by having this permit issued in your name as the Owner-Builder. **We will not issue a building permit until you have read, initialed your understanding of each provision, signed, and returned this form to us at our official address indicated.** An agent of the owner cannot execute this notice unless you, the property owner, obtain the prior approval of the permitting authority.

OWNER'S ACKNOWLEDGMENT AND VERIFICATION OF INFORMATION

DIRECTIONS: Read and initial each statement below to signify you understand or verify this information.

A.A. 1. I understand a frequent practice of unlicensed persons is to have the property owner obtain an "Owner-Builder" building permit that erroneously implies that the property owner is providing his or her own labor and material personally. I, as an Owner-Builder, may be held liable and subject to serious financial risk for any injuries sustained by an unlicensed person and his or her employees while working on my property. My homeowner's insurance may not provide coverage for those injuries. I am willfully acting as an Owner-Builder and am aware of the limits of my insurance coverage for injuries to workers on my property.

A.A. 2. I understand building permits are not required to be signed by property owners unless they are *responsible* for the construction and are not hiring a licensed Contractor to assume this responsibility.

A.A 3. I understand as an "Owner-Builder" I am the responsible party of record on the permit. I understand that I may protect myself from potential financial risk by hiring a licensed Contractor and having the permit filed in his or her name instead of my own.

A.A 4. I understand Contractors are required by law to be licensed and bonded in California and to list their license numbers on permits and contracts.

A.A. 5. I understand if I employ or otherwise engage any persons, other than California licensed Contractors, and the total value of my construction is at least five hundred dollars ($500), including labor and materials, I may be considered an "employer" under state and federal law.

A.A. 6. I understand if I am considered an "employer" under state and federal law, I must register with the state and federal government, withhold payroll taxes, provide workers' compensation disability insurance, and contribute to unemployment compensation for each "employee." I also understand my failure to abide by these laws may subject me to serious financial risk.

A.A. 7. I understand under California Contractors' State License Law, an Owner-Builder who builds single-family residential structures cannot legally build them with the intent to offer them for sale, unless *all* work is performed by

licensed subcontractors and the number of structures does not exceed four within any calendar year, or all of the work is performed under contract with a licensed general building Contractor.

A.A. 8. I understand as an Owner-Builder if I sell the property for which this permit is issued, I may be held liable for any financial or personal injuries sustained by any subsequent owner(s) that result from any latent construction defects in the workmanship or materials.

A.A. 9. I understand I may obtain more information regarding my obligations as an "employer" from the Internal Revenue Service, the United States Small Business Administration, the California Department of Benefit Payments, and the California Division of Industrial Accidents. I also understand I may contact the California Contractors' State License Board (CSLB) at 1-800-321-CSLB (2752) or www.cslb.ca.gov for more information about licensed contractors.

A.A 10. I am aware of and consent to an Owner-Builder building permit applied for in my name, and understand that I am the party legally and financially responsible for proposed construction activity at the following address: _____

A.A 11. I agree that, as the party legally and financially responsible for this proposed construction activity, I will abide by all applicable laws and requirements that govern Owner-Builders as well as employers.

A.A. 12. I agree to notify the issuer of this form immediately of any additions, deletions, or changes to any of the information I have provided on this form. Licensed contractors are regulated by laws designed to protect the public. If you contract with someone who does not have a license, the Contractors' State License Board may be unable to assist you with any financial loss you may sustain as a result of a complaint. Your only remedy against unlicensed Contractors may be in civil court. It is also important for you to understand that if an unlicensed Contractor or employee of that individual or firm is injured while working on your property, you may be held liable for damages. If you obtain a permit as Owner-Builder and wish to hire Contractors, you will be responsible for verifying whether or not those Contractors are properly licensed and the status of their workers' compensation insurance coverage.

Before a building permit can be issued, this form must be completed and signed by the property owner and returned to the agency responsible for issuing the permit. ***Note: A copy of the property owner's driver's license, form notarization, or other verification acceptable to the agency is required to be presented when the permit is issued to verify the property owner's signature.***

Signature of property owner Alan D. Date: 6/25/10

Note: The following Authorization Form is required to be completed by the property owner only when designating an agent of the property owner to apply for a construction permit for the Owner-Builder.

AUTHORIZATION OF AGENT TO ACT ON PROPERTY OWNER'S BEHALF

Excluding the Notice to Property Owner, the execution of which I understand is my personal responsibility, I hereby authorize the following person(s) to act as my agent(s) to apply for, sign, and file the documents necessary to obtain an Owner-Builder Permit for my project.

Scope of Construction Project (or Description of Work): Rebuild Walkway & Decks

Project Location or Address: #2 Park Circle Marin City

Name of Authorized Agent: _____ Tel No _____

Address of Authorized Agent: _____ email _____

I declare under penalty of perjury that I am the property owner for the address listed above and I personally filled out the above information and certify its accuracy. *Note: A copy of the owner's driver's license, form notarization, or other verification acceptable to the agency is required to be presented when the permit is issued to verify the property owner's signature.*

Property Owner's Signature: _____ Date: _____

MARIN COUNTY ZONING AND LAND DEVELOPMENT REPORT

Address: 825 Drake Ave., Marin City A.P. #: 052-112-03 Zoning: RMP-3.4

- ☐ New Principal Structure (Demo Ex ____)
- ☐ New Accessory Structure
- ☐ Addition
- ☐ Interior Work
- ☐ Pool/Hot Tub
- ☐ Retaining Wall
- ☒ Deck Repair/Replacement
- ☐ Other

	Yes	Date
DR/DM/DC # ____	☐	
Use Permit # ____	☐	
Variance # ____	☐	
Second Unit # ____	☐	
Coastal Permit # ____	☐	
Other ____	☐	

	Principal				Accessory			Verify
	Req.	Sub.	1	2	Req.	Sub.	3	
Lot Size								
Setbacks: Front								
Side								
Corner / Side								
Rear								
Height								
FAR %								
Square footage								

Projections	Max	Sub
Deck		
Stair		
Other		

Exemptions:

Section 22.42.025

Building Area	%

- ☐ Single-Story
- ☐ Multi-Story
- ☐ Minor and Incidental
- ☐ Coastal Permit

Remarks: Repair & replace wooden walls, concrete pad, & expand foundation

Approved By: _____ Date: 12/30/09

Access:

County Maintained Road: ☒ Yes ☐ No

Encroachment Permit required for driveway/ROW work: ☒ Yes ☒ No EP 10-121

☐ Recorded ☒ Standard

Final

Remarks: replace wooden ~~walk~~ walkway ramp partially encroachs in to ROW

Frontage Improvements required: NONE

Remarks: N/A

Grading: NONE

- ☐ Under direction of Soils/Design Engineer
- ☑ Conduct per plan
- ☐ To be certified in writing by Soils/Design Engineer/Architect

Foundation:

- ☒ Per Plan
- ☐ Site retaining wall construction shall be certified in writing by the Design Engineer / Architect

Remarks: _____

Drainage

- ☑ Away from foundation
- ☐ Roof drains shall be connected to a drainage system
- ☐ Site drainage shall be inspected and certified in writing by the Design Engineer / Architect
- ☒ Maintain existing drainage patterns

Remarks: _____

Additional Requirements:

1. Any work in a County maintained road shall have an encroachment permit from DPW.
2. All required improvements shall be completed prior to calling for Final Inspection.
3. Call Department of Public Works at (415) 499-6549 at least 2 business days in advance for inspections.
4. Erosion control measures shall be effective for phase of construction and time of year. Owner/Contractor shall be responsible for all erosion control measures.
5. As built site plan may be required prior to final inspection if work substantially deviates from plans.

Final (6) Ramp slope & width to be inspected by DPW Engineer for accessibility compliance.

DPW Hold: ☒ Yes ☐ No

☐ Foundation ☐ Framing ☒ Final

☐ Issuance

Special Flood Hazard Zone: X BFE: _____

☐ Elevation Certificate Required

Reviewed By: M. Date: 6/4/10 Approved By: Michel Jeremias Date: 6.9.10

Sanitary District No. _____ Septic system: _____ Approved By: _____ Date: _____

during periods that the space is occupied. The grilles shall remain secured in the full-open position during the period of occupancy by the general public. Where two or more means of egress are required, not more than one-half of the exits or exit access doorways shall be equipped with horizontal sliding or vertical security grilles.

1008.1.4 Floor elevation. There shall be a floor or landing on each side of a door. Such floor or landing shall be at the same elevation on each side of the door. Landings shall be level except for exterior landings, which are permitted to have a slope not to exceed 0.25 unit vertical in 12 units horizontal (2-percent slope).

Exceptions:

1. Doors serving individual dwelling units in Groups R-2 and R-3 where the following apply:
   1.1. A door is permitted to open at the top step of an interior flight of stairs, provided the door does not swing over the top step.
   1.2. Screen doors and storm doors are permitted to swing over stairs or landings.
2. Exterior doors as provided for in Section 1003.5, Exception 1, and Section 1018.2, which are not on an accessible route.
3. In Group R-3 occupancies not required to be *adaptable or accessible*, the landing at an exterior doorway shall not be more than 7.75 inches (197 mm) below the top of the threshold, provided the door, other than an exterior storm or screen door, does not swing over the landing.
4. Variations in elevation due to differences in finish materials, but not more than 0.5 inch (12.7 mm).

1008.1.5 Landings at doors. Landings shall have a width not less than the width of the stairway or the door, whichever is greater. Doors in the fully open position shall not reduce a required dimension by more than 7 inches (178 mm). When a landing serves an occupant load of 50 or more, doors in any position shall not reduce the landing to less than one-half its required width. Landings shall have a length measured in the direction of travel of not less than 44 inches (1118 mm).

Exception: Landing length in the direction of travel in Groups R-3 and U and within individual units of Group R-2 need not exceed 36 inches (914 mm).

1008.1.6 Thresholds. Thresholds at doorways shall not exceed 0.75 inch (19.1 mm) in height for sliding doors serving dwelling units or 0.5 inch (12.7 mm) for other doors. Raised thresholds and floor level changes greater than 0.25 inch (6.4 mm) at doorways shall be beveled with a slope not greater than one unit vertical in two units horizontal (50-percent slope).

Exception: The threshold height shall be limited to 7.75 inches (197 mm) where the occupancy is Group R-2 or R-3; the door is an exterior door that is not a component of the required means of egress; the door, other than an exterior storm or screen door does not swing over the landing or step; and the doorway is not on an accessible route as required by *Chapter 11A or 11B* and is not part of an *adaptable or accessible dwelling unit.*

1008.1.7 Door arrangement. Space between two doors in a series shall be 48 inches (1219 mm) minimum plus the width of a door swinging into the space. Doors in a series shall swing either in the same direction or away from the space between the doors.

Exceptions:

1. The minimum distance between horizontal sliding power-operated doors in a series shall be 48 inches (1219 mm).
2. Storm and screen doors serving individual dwelling units in Groups R-2 and R-3 need not be spaced 48 inches (1219 mm) from the other door.
3. Doors within individual dwelling units in Groups R-2 and R-3 *occupancies* other than *adaptable or accessible dwelling units.*

1008.1.8 Door operations. Except as specifically permitted by this section egress doors shall be readily openable from the egress side without the use of a key or special knowledge or effort.

1008.1.8.1 Hardware. Door handles, pulls, latches, locks and other operating devices on doors required to be accessible by *Chapter 11A or Chapter 11B* shall not require tight grasping, tight pinching or twisting of the wrist to operate.

1008.1.8.2 Hardware height. Door handles, pulls, latches, locks and other operating devices shall be installed 34 inches (864 mm) minimum and 48 inches (1219 mm) maximum above the finished floor. Locks used only for security purposes and not used for normal operation are permitted at any height.

Exception: Access doors or gates in barrier walls and fences protecting pools, spas and hot tubs shall be permitted to have operable parts of the release of latch on self-latching devices at 54 inches (1370 mm) maximum above the finished floor or ground, provided the self-latching devices are not also self-locking devices operated by means of a key, electronic opener or integral combination lock.

1008.1.8.3 Locks and latches. Locks and latches shall be permitted to prevent operation of doors where any of the following exists:

1. Places of detention or restraint.
2. In buildings in occupancy Group A having an occupant load of 300 or less, Groups B, F, M and S, and in places of religious worship, the main exterior door or doors are permitted to be equipped with key-operated locking devices from the egress side provided:
   2.1. The locking device is readily distinguishable as locked,
   2.2. A readily visible durable sign is posted on the egress side on or adjacent to the door stating: THIS DOOR TO REMAIN UNLOCKED WHEN BUILDING IS OCCUPIED. The sign shall be in letters 1 inch (25 mm) high on a contrasting background,
   2.3. The use of the key-operated locking device is revokable by the building official for due cause.
3. Where egress doors are used in pairs, approved automatic flush bolts shall be permitted to be used, provided that the door leaf having the automatic flush bolts has no doorknob or surface-mounted hardware.
4. Doors from individual dwelling or sleeping units of Group R occupancies having an occupant load of 10 or less are permitted to be equipped with a night latch, dead bolt or security chain, provided such devices are openable from the inside without the use of a key or tool.

1008.1.8.4 Bolt locks. Manually operated flush bolts or surface bolts are not permitted.

Exceptions:

1. On doors not required for egress in individual dwelling units or sleeping units.
2. Where a pair of doors serves a storage or equipment room, manually operated edge- or surface-mounted bolts are permitted on the inactive leaf.

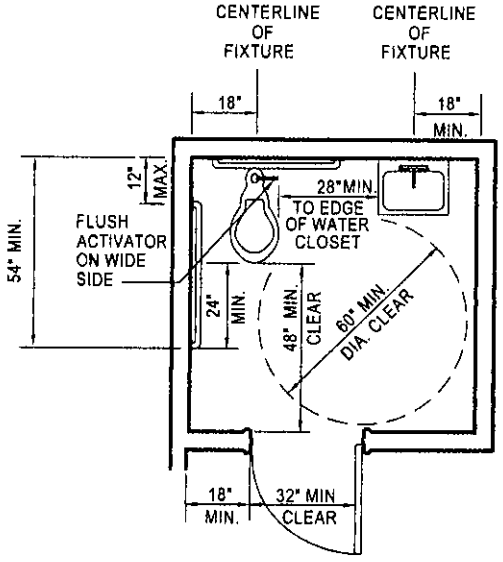
1008.1.8.5 Unlatching. The unlatching of any door or leaf shall not require more than one operation.

Exceptions:

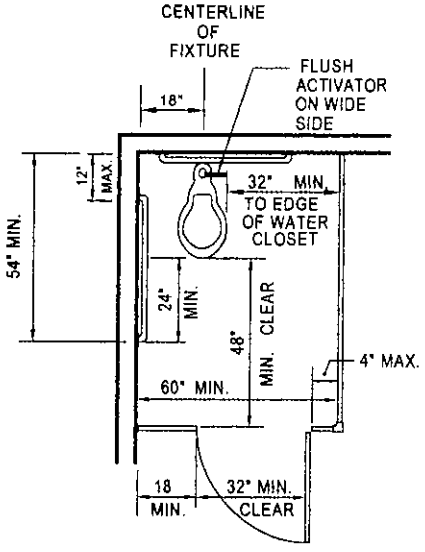
1. Places of detention or restraint.
2. Where manually operated bolt locks are permitted by Section 1008.1.8.4.
3. Doors with automatic flush bolts as permitted by Section 1008.1.8.3, Exception 3.
4. Doors from individual dwelling units and sleeping units of Group R occupancies as permitted by Section 1008.1.8.3, Exception 4.

1008.1.8.6 Delayed egress locks. Approved, listed, delayed egress locks shall be permitted to be installed on doors serving any occupancy except Group A, E and H occupancies in buildings that are equipped throughout with an automatic sprinkler system in accordance with Section 903.3.1.1 *and* an approved automatic smoke detection system installed in accordance with Section 907, provided that the doors unlock in accordance with Items 1 through 9 below. A building occupant shall not be required to pass through more than one door equipped with a delayed egress lock before entering an exit. *Delayed egress devices shall conform to all of the following:*

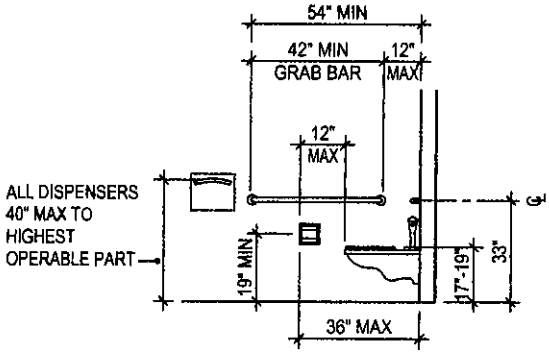
1. The doors unlock upon actuation of the automatic sprinkler system or automatic *smoke* detection system.



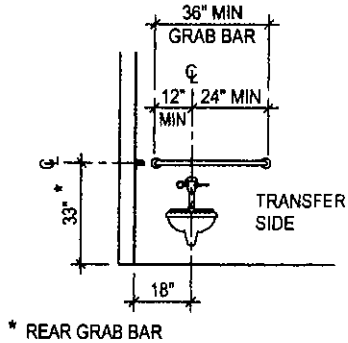
SINGLE-ACCOMMODATION TOILET FACILITY



ACCESSIBLE WATER CLOSET COMPARTMENT WITHIN A MULTIPLE-ACCOMMODATION TOILET FACILITY



SIDE WALL ELEVATION

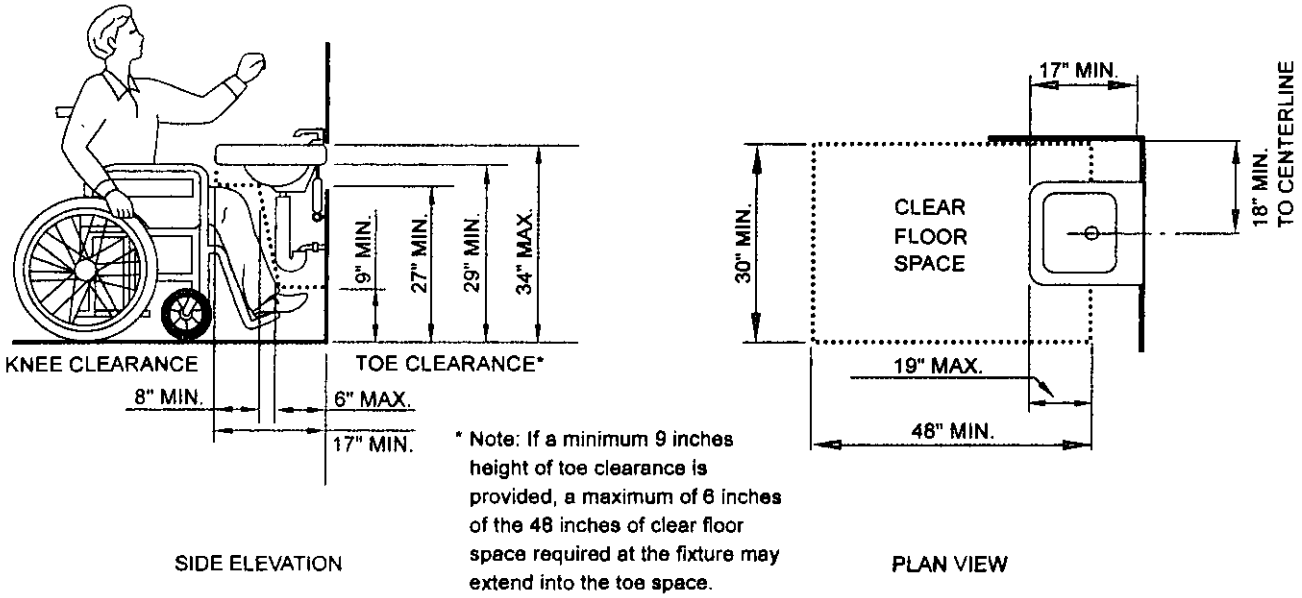


* REAR GRAB BAR ALLOWED AT 36" A.F.F. AT TANK-TYPE TOILET

REAR WALL ELEVATION

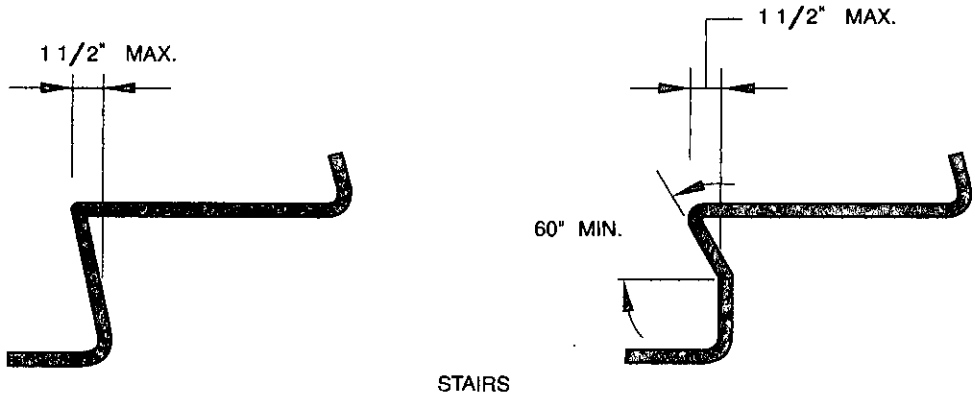
THESE DIAGRAMS ILLUSTRATE THE SPECIFIC REQUIREMENTS OF THESE REGULATIONS AND ARE INTENDED ONLY AS AN AID FOR BUILDING DESIGN AND CONSTRUCTION

FIGURE 11B-1A

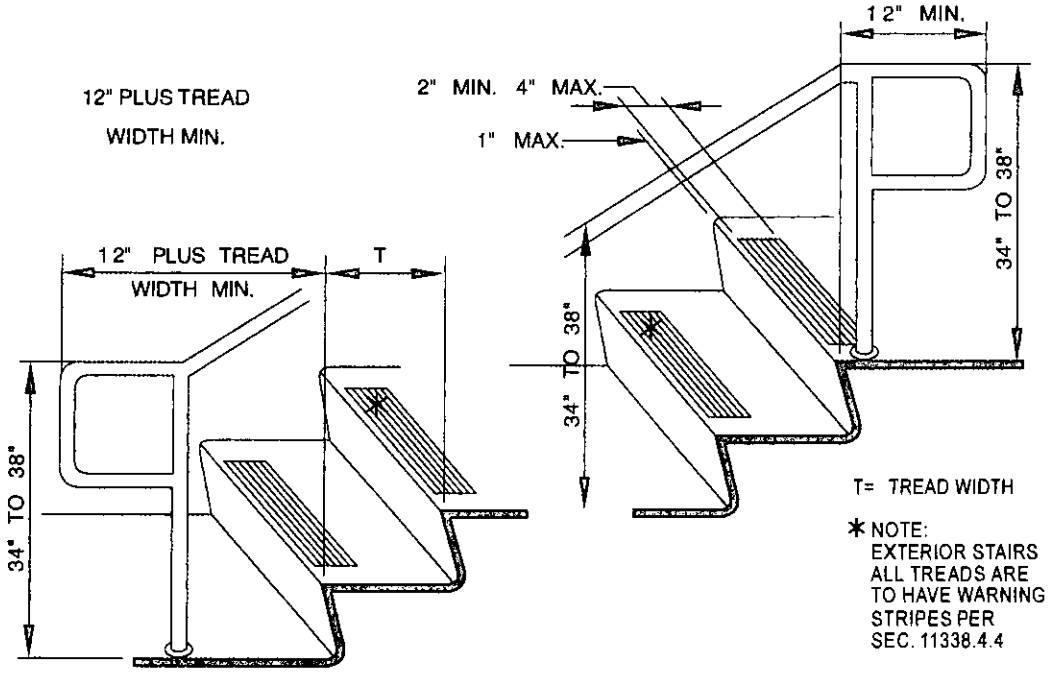


THESE DIAGRAMS ILLUSTRATE THE SPECIFIC REQUIREMENTS OF THESE REGULATIONS AND ARE INTENDED ONLY AS AN AID FOR BUILDING DESIGN AND CONSTRUCTION.

FIGURE 11B-1D—KNEE CLEARANCE

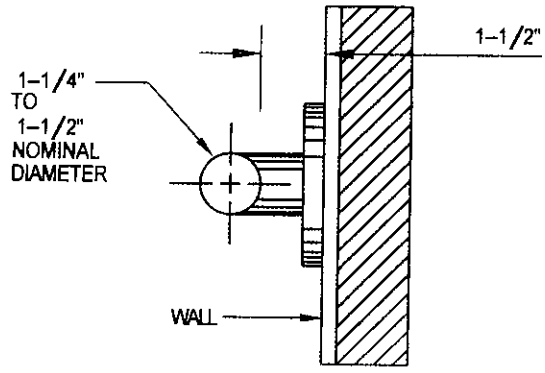


STAIRS



THESE DIAGRAMS ILLUSTRATE THE SPECIFIC REQUIREMENTS OF THESE REGULATIONS AND ARE INTENDED ONLY AS AN AID FOR BUILDING DESIGN AND CONSTRUCTION.

FIGURE 11B-35—WARNING STRIPING AND HANDRAIL EXTENSIONS



THIS DIAGRAM ILLUSTRATES THE SPECIFIC REQUIREMENTS OF THESE REGULATIONS AND IS INTENDED ONLY AS AN AID FOR BUILDING DESIGN AND CONSTRUCTION

FIGURE 11B-1C—TYPICAL GRAB BAR SECTION

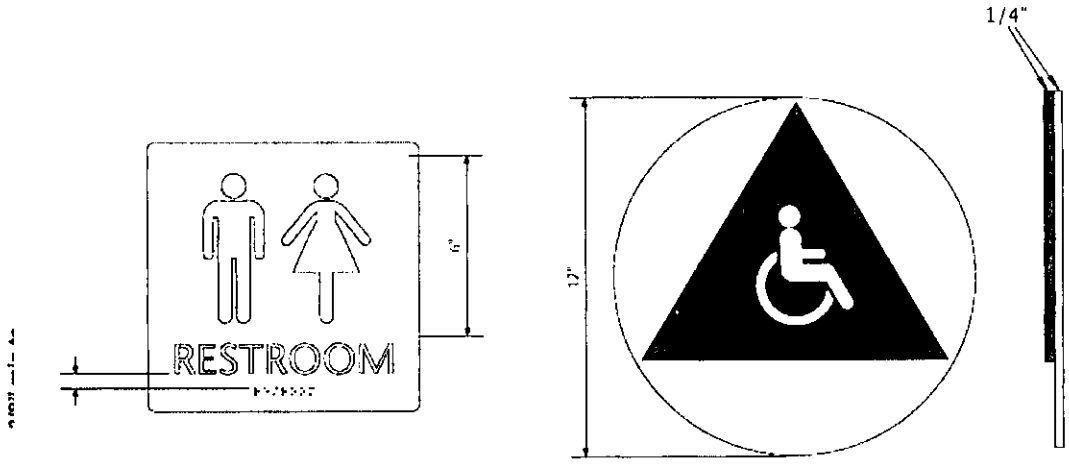


Fig 17-A. Tactile Restroom Signage and Contrasting Restroom Symbols for Unisex Restroom

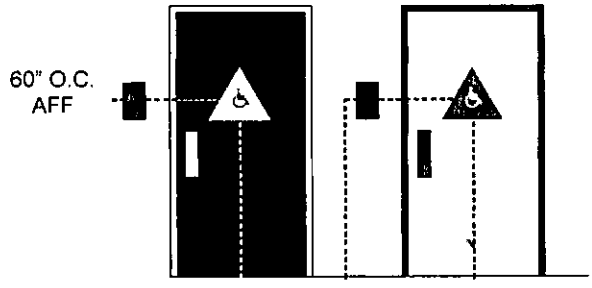
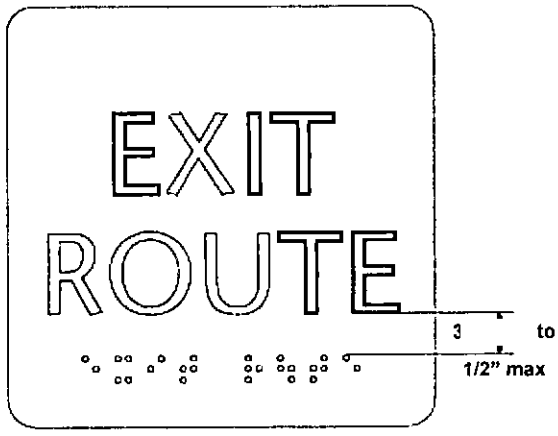


Fig 17-B. Contrasting Restroom Symbols Centered on Door Leaf at 60" O.C. AFF



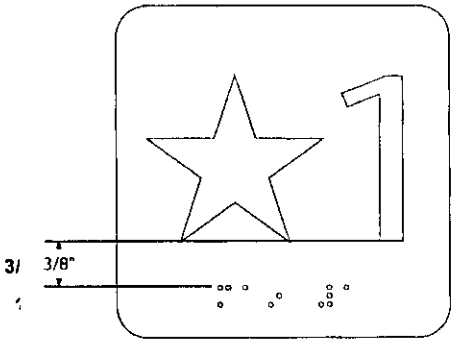


Fig 17-C. Tactile Stair Identification Sign with Exit Discharge Level Star

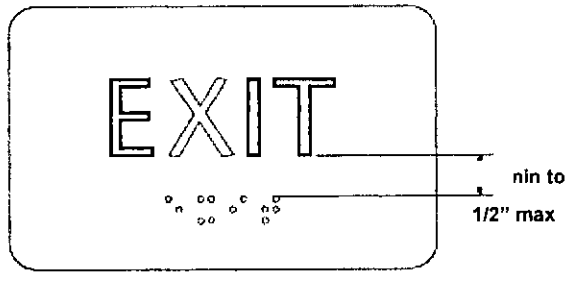


Fig 17-D. Tactile Exit Route and Exit Signs

© 2008 DSA

COUNTY OF MARIN DEPARTMENT OF PUBLIC WORKS

BUILDING INSPECTION DIVISION BUILDING PERMIT APPLICATION

BUILDING PERMIT	A-6749	DATE	9-13-65
OCCUPANCY		TYPE CONST.	CHURCH
		GROUP	
OWNER	Village Baptist Church		
JOB ADDRESS	825 DRAKE & Park Circle	LOT	150
NEAREST CROSS ST.		BLOCK	
LOCALITY	MARIN CITY, CALIF	TRACT	
CONTRACTOR	CONGERGATION		
ADDRESS	P.O. Box 13		
POST OFFICE	MARIN CITY		
TELEPHONE NO.	332-3944	STATE LICENSE	

ZONING INFORMATION

ASSESSOR'S PARCEL NO.:	52-112-01
NUMBER OF STORIES	2
TOTAL HEIGHT	18'
MAXIMUM ROOF OVERHANG INTO SETBACK	4½'
MAXIMUM DECK PROJECTION INTO SETBACK	

DISTANCE TO PROPERTY LINES

	FRONT	REAR	SIDE	SIDE
SUBMITTED	228'	24'	S 40'	N 112'
REQUIRED				

REMARKS

BUILDING INSPECTION RECORD

TYPE		DATE	INSPECTOR
FOUNDATION	☐		
SLABS	☐		
FRAME	☐		
INT. LATH	☐		
EXT. LATH	☐		
MASONRY WALLS	☐		
FIREPLACE	☐		
MISC.	☐		

APPROVED: MARIN COUNTY PLANNING DEPARTMENT

BY: Edward R. Parkerson DATE 9/13/65

REMARKS:

SEWER ☐ SEPTIC TANK ☐

177

FINAL ☐

SIGNATURE OF APPLICANT	Samuel L. Banks	LIVABLE AREA	VALUATION $ 74,000
OWNER'S ADDRESS	P.O. Box 13 Marin City	CHIEF BLDG. INSP.	PERMIT FEE $
OWNER		APPROVED BY	CHECKING FEE
		ISSUED BY	TOTAL FEE

APPENDIX D-2

HISTORIC MAPS

Commercial Property

825 Drake Avenue

Sausalito, CA 94965

Inquiry Number: 7216358.3

January 03, 2023

Certified Sanborn® Map Report

6 Armstrong Road, 4th floor
Shelton, CT 06484
Toll Free: 800.352.0050
www.edrnet.com

Certified Sanborn® Map Report

01/03/23

Site Name:

Commercial Property
825 Drake Avenue
Sausalito, CA 94965
EDR Inquiry # 7216358.3

Client Name:

KCE Matrix
1112 W Burbank Blvd Suite 301
Burbank, CA 91506
Contact: Aram Kaloustian

The Sanborn Library has been searched by EDR and maps covering the target property location as provided by KCE Matrix were identified for the years listed below. The Sanborn Library is the largest, most complete collection of fire insurance maps. The collection includes maps from Sanborn, Bromley, Perris & Browne, Hopkins, Barlow, and others. Only Environmental Data Resources Inc. (EDR) is authorized to grant rights for commercial reproduction of maps by the Sanborn Library LLC, the copyright holder for the collection. Results can be authenticated by visiting www.edrnet.com/sanborn.

The Sanborn Library is continually enhanced with newly identified map archives. This report accesses all maps in the collection as of the day this report was generated.

Certified Sanborn Results:

Certification # 7260-4734-A2BB

PO # KCE-2022-459E

Project Commercial Property

UNMAPPED PROPERTY

This report certifies that the complete holdings of the Sanborn Library, LLC collection have been searched based on client supplied target property information, and fire insurance maps covering the target property were not found.

Sanborn® Library search results

Certification #: 7260-4734-A2BB

The Sanborn Library includes more than 1.2 million fire insurance maps from Sanborn, Bromley, Perris & Browne, Hopkins, Barlow and others which track historical property usage in approximately 12,000 American cities and towns. Collections searched:

- ☑ Library of Congress
- ☑ University Publications of America
- ☑ EDR Private Collection

The Sanborn Library LLC Since 1866™

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APPENDIX D-3

AERIAL PHOTOGRAPHS

Commercial Property

825 Drake Avenue

Sausalito, CA 94965

Inquiry Number: 7216358.8

January 03, 2023

The EDR Aerial Photo Decade Package

6 Armstrong Road, 4th floor
Shelton, CT 06484
Toll Free: 800.352.0050
www.edrnet.com

EDR Aerial Photo Decade Package

01/03/23

Site Name:

Commercial Property
825 Drake Avenue
Sausalito, CA 94965
EDR Inquiry # 7216358.8

Client Name:

KCE Matrix
1112 W Burbank Blvd Suite 301
Burbank, CA 91506
Contact: Aram Kaloustian

Environmental Data Resources, Inc. (EDR) Aerial Photo Decade Package is a screening tool designed to assist environmental professionals in evaluating potential liability on a target property resulting from past activities. EDR's professional researchers provide digitally reproduced historical aerial photographs, and when available, provide one photo per decade.

Search Results:

Year	*Scale*	*Details*	*Source*
2020	1"=500'	Flight Year: 2020	USDA/NAIP
2016	1"=500'	Flight Year: 2016	USDA/NAIP
2012	1"=500'	Flight Year: 2012	USDA/NAIP
2009	1"=500'	Flight Year: 2009	USDA/NAIP
2005	1"=500'	Flight Year: 2005	USDA/NAIP
1993	1"=500'	Acquisition Date: January 01, 1993	USGS/DOQQ
1987	1"=500'	Acquisition Date: June 22, 1987	USGS/DOQQ
1983	1"=500'	Flight Date: July 03, 1983	USDA
1974	1"=500'	Flight Date: June 26, 1974	USGS
1968	1"=500'	Flight Date: April 16, 1968	USGS
1963	1"=500'	Flight Date: June 03, 1963	EDR Proprietary Aerial Viewpoint
1958	1"=500'	Flight Date: July 25, 1958	USGS
1952	1"=500'	Flight Date: June 12, 1952	USGS
1946	1"=500'	Flight Date: September 06, 1946	USGS

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INQUIRY #: 7216358.8
YEAR: 2020
= 500'
N
EDR

INQUIRY #: 7216358.8

YEAR: 2016

= 500'

N

EDR

INQUIRY #: 7216358.8
YEAR: 2012
= 500'
N
EDR

INQUIRY #: 7216358.8
YEAR: 2009
= 500'
N
EDR

INQUIRY #: 7216358.8
YEAR: 2005
= 500'
N
EDR

INQUIRY #: 7216358.8

YEAR: 1993

= 500'

N

EDR

INQUIRY #: 7216358.8
YEAR: 1987
= 500'
N
EDR

INQUIRY #: 7216358.8
YEAR: 1983
= 500'
N
EDR

INQUIRY #: 7216358.8
YEAR: 1974
= 500'
N
EDR

INQUIRY #: 7216358.8
YEAR: 1968
= 500'
N
EDR

INQUIRY #: 7216358.8
YEAR: 1963
= 500'
N
EDR

INQUIRY #: 7216358.8
YEAR: 1958
= 500'
N
EDR

INQUIRY #: 7216358.8

YEAR: 1952

= 500'

N

EDR

INQUIRY #: 7216358.8

YEAR: 1946

= 500'

N

EDR

APPENDIX D-4

HISTORICAL TOPOGRAPHIC MAPS

Commercial Property

825 Drake Avenue

Sausalito, CA 94965

Inquiry Number: 7216358.4

January 03, 2023

EDR Historical Topo Map Report

with QuadMatch™

6 Armstrong Road, 4th floor
Shelton, CT 06484
Toll Free: 800.352.0050
www.edrnet.com

EDR Historical Topo Map Report

01/03/23

Site Name:	Client Name:
Commercial Property	KCE Matrix
825 Drake Avenue	1112 W Burbank Blvd Suite 301
Sausalito, CA 94965	Burbank, CA 91506
EDR Inquiry # 7216358.4	Contact: Aram Kaloustian

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Search Results:		*Coordinates:*	
P.O.#	KCE-2022-459E	**Latitude:**	37.874502 37° 52' 28" North
Project:	Commercial Property	**Longitude:**	-122.513943 -122° 30' 50" West
		UTM Zone:	Zone 10 North
		UTM X Meters:	542747.25
		UTM Y Meters:	4192002.22
		Elevation:	61.52' above sea level

Maps Provided:

2018	1950
2015	1947, 1948
2012	1941
1996	1940
1995	1895, 1897
1978, 1980	
1968	
1954, 1956, 1959	

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Topo Sheet Key

This EDR Topo Map Report is based upon the following USGS topographic map sheets.

2018 Source Sheets

Point Bonita
2018
7.5-minute, 24000

San Rafael
2018
7.5-minute, 24000

San Francisco North
2018
7.5-minute, 24000

San Quentin
2018
7.5-minute, 24000

2015 Source Sheets

Point Bonita
2015
7.5-minute, 24000

San Rafael
2015
7.5-minute, 24000

San Francisco North
2015
7.5-minute, 24000

San Quentin
2015
7.5-minute, 24000

2012 Source Sheets

Point Bonita
2012
7.5-minute, 24000

San Rafael
2012
7.5-minute, 24000

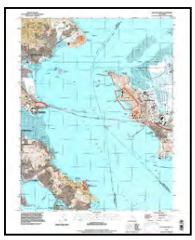
San Francisco North
2012
7.5-minute, 24000

San Quentin
2012
7.5-minute, 24000

1996 Source Sheets

Point Bonita
1996
7.5-minute, 24000
Aerial Photo Revised 1993

San Rafael
1996
7.5-minute, 24000
Aerial Photo Revised 1993



San Quentin
1996
7.5-minute, 24000
Aerial Photo Revised 1993

San Francisco North
1996
7.5-minute, 24000
Aerial Photo Revised 1993

Topo Sheet Key

This EDR Topo Map Report is based upon the following USGS topographic map sheets.

1995 Source Sheets

San Francisco North
1995
7.5-minute, 24000
Aerial Photo Revised 1995

San Rafael
1995
7.5-minute, 24000
Aerial Photo Revised 1995

San Quentin
1995
7.5-minute, 24000
Aerial Photo Revised 1993

1978, 1980 Source Sheets

Point Bonita
1978
7.5-minute, 24000
Aerial Photo Revised 1968

San Quentin
1980
7.5-minute, 24000
Aerial Photo Revised 1979

San Rafael
1980
7.5-minute, 24000
Aerial Photo Revised 1979

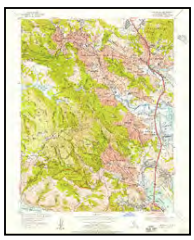
1968 Source Sheets

San Francisco North
1968
7.5-minute, 24000
Aerial Photo Revised 1968

Point Bonita
1968
7.5-minute, 24000
Aerial Photo Revised 1968

San Rafael
1968
7.5-minute, 24000
Aerial Photo Revised 1968

1954, 1956, 1959 Source Sheets



San Rafael
1954
7.5-minute, 24000
Aerial Photo Revised 1952

Point Bonita
1954
7.5-minute, 24000
Aerial Photo Revised 1952

San Francisco North
1956
7.5-minute, 24000
Aerial Photo Revised 1956

San Quentin
1959
7.5-minute, 24000
Aerial Photo Revised 1958

Topo Sheet Key

This EDR Topo Map Report is based upon the following USGS topographic map sheets.

1950 Source Sheets

Mt. Tamalpais
1950
15-minute, 62500
Aerial Photo Revised 1948

1947, 1948 Source Sheets

TAMALPAIS
1947
15-minute, 50000

SAN FRANCISCO
1948
15-minute, 50000

1941 Source Sheets

Tamalpais
1941
15-minute, 62500
Aerial Photo Revised 1939

1940 Source Sheets

Tamalpais
1940
15-minute, 62500

Topo Sheet Key

This EDR Topo Map Report is based upon the following USGS topographic map sheets.

1895, 1897 Source Sheets

San Francisco
1895
15-minute, 62500

Tamalpais
1897
15-minute, 62500

Historical Topo Map

2018

This report includes information from the following map sheet(s).

0 Miles 0.25 0.5 1 1.5

NW N NE
W E
SW S SE

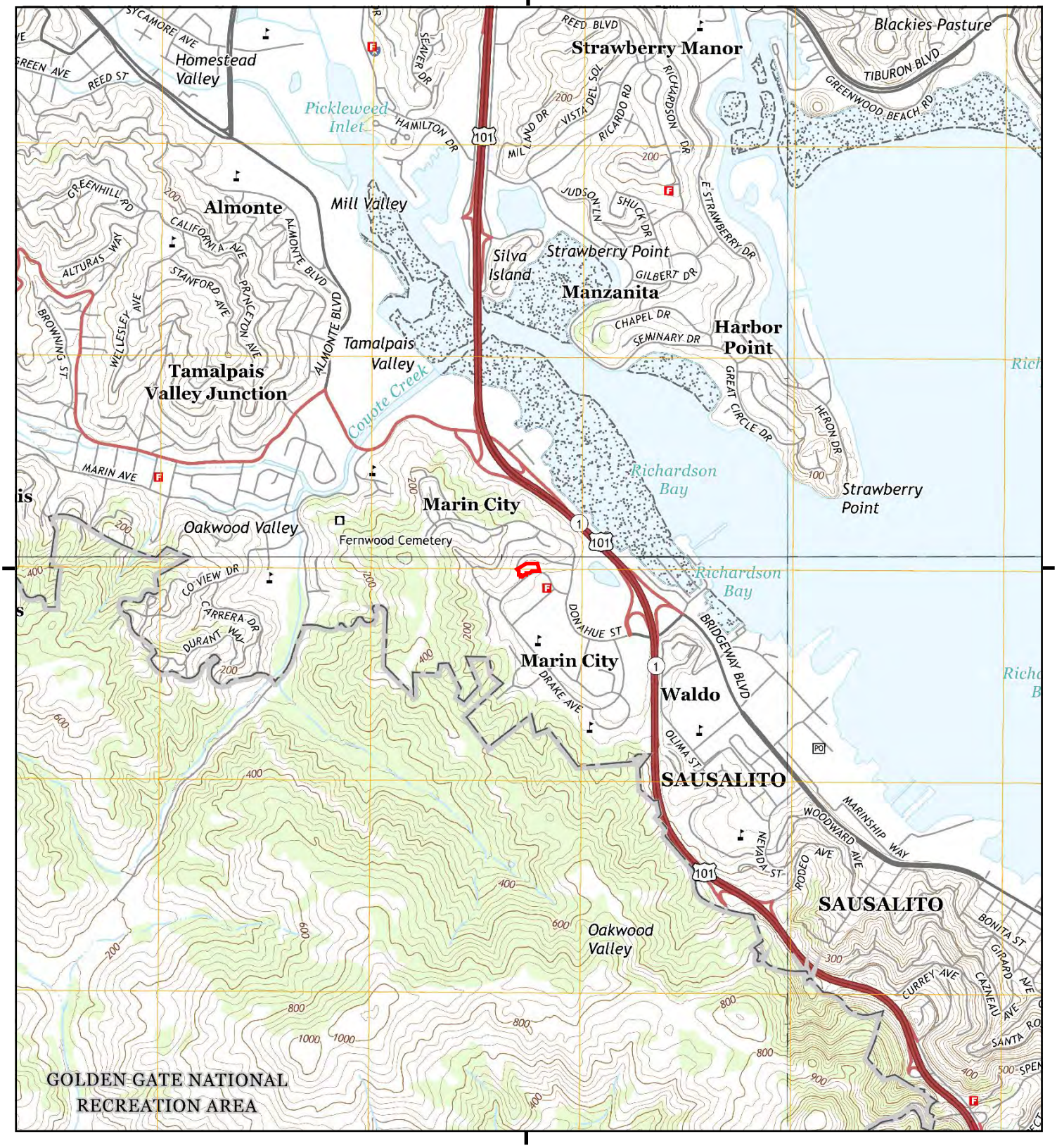
TP, Point Bonita, 2018, 7.5-minute
NE, San Quentin, 2018, 7.5-minute
SE, San Francisco North, 2018, 7.5-minute
NW, San Rafael, 2018, 7.5-minute

SITE NAME: Commercial Property
ADDRESS: 825 Drake Avenue
Sausalito, CA 94965
CLIENT: KCE Matrix

N

Historical Topo Map

2015



This report includes information from the following map sheet(s).

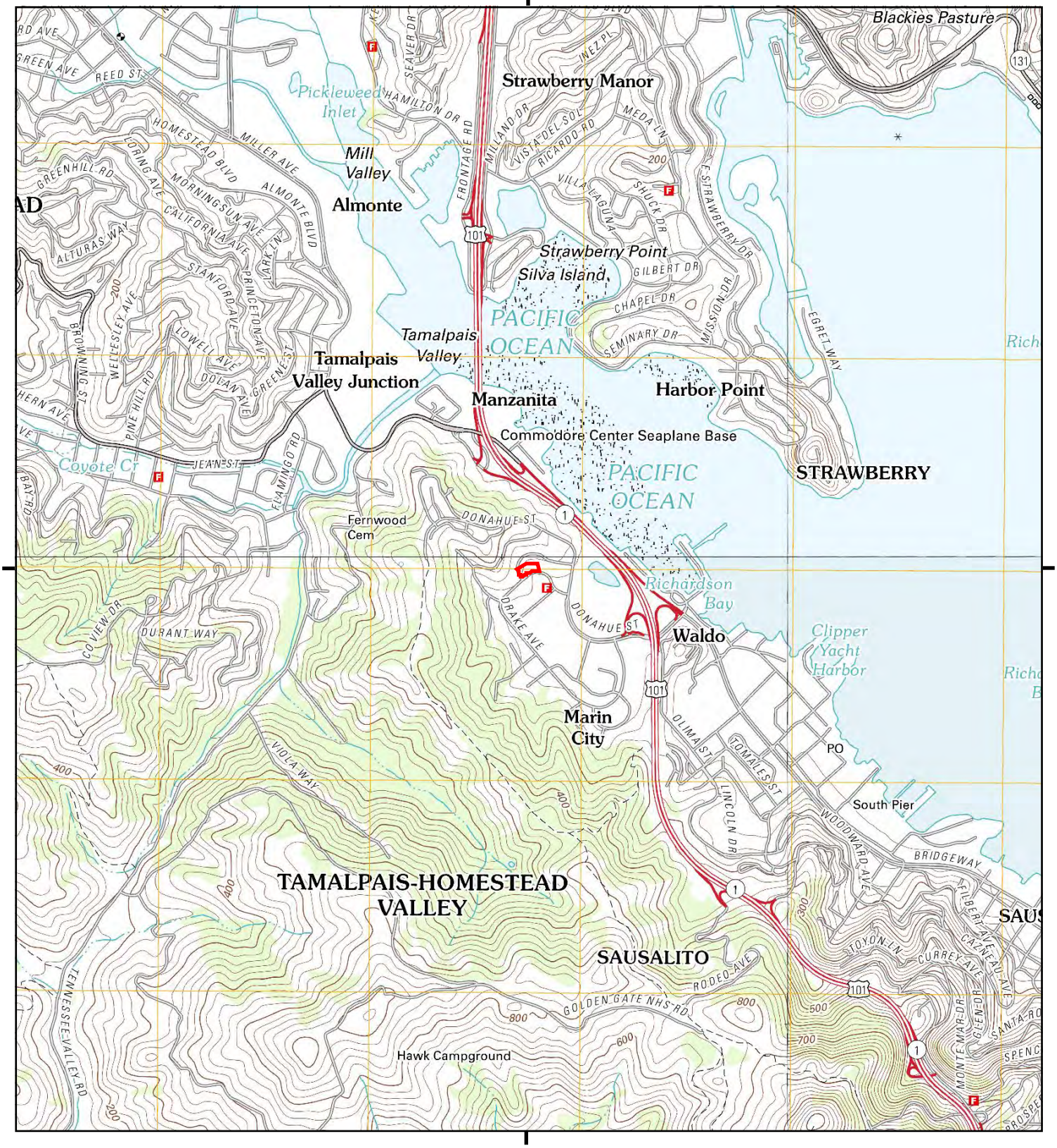
0 Miles 0.25 0.5 1 1.5

NW N NE
W E
SW S SE

TP, Point Bonita, 2015, 7.5-minute
NE, San Quentin, 2015, 7.5-minute
SE, San Francisco North, 2015, 7.5-minute
NW, San Rafael, 2015, 7.5-minute

SITE NAME: Commercial Property
ADDRESS: 825 Drake Avenue
Sausalito, CA 94965
CLIENT: KCE Matrix

N



This report includes information from the following map sheet(s).

0 Miles 0.25 0.5 1 1.5

NW N NE
W E
SW S SE

TP, Point Bonita, 2012, 7.5-minute
NE, San Quentin, 2012, 7.5-minute
SE, San Francisco North, 2012, 7.5-minute
NW, San Rafael, 2012, 7.5-minute

SITE NAME: Commercial Property
ADDRESS: 825 Drake Avenue
Sausalito, CA 94965
CLIENT: KCE Matrix

N

This report includes information from the following map sheet(s).

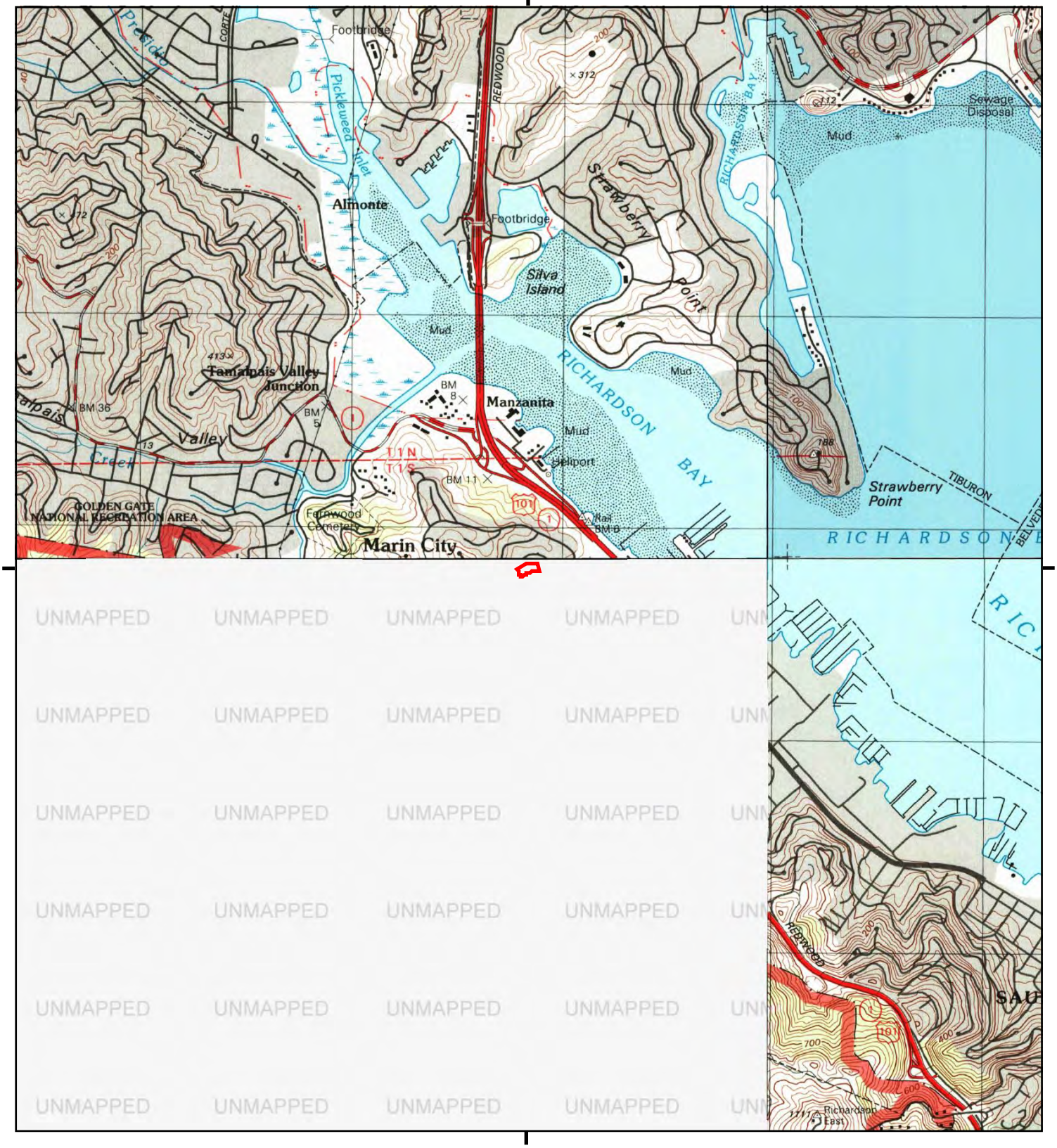
0 Miles 0.25 0.5 1 1.5

NW N NE
W E
SW S SE

TP, Point Bonita, 1996, 7.5-minute
NE, San Quentin, 1996, 7.5-minute
SE, San Francisco North, 1996, 7.5-minute
NW, San Rafael, 1996, 7.5-minute

SITE NAME: Commercial Property
ADDRESS: 825 Drake Avenue
Sausalito, CA 94965
CLIENT: KCE Matrix

N



This report includes information from the following map sheet(s).

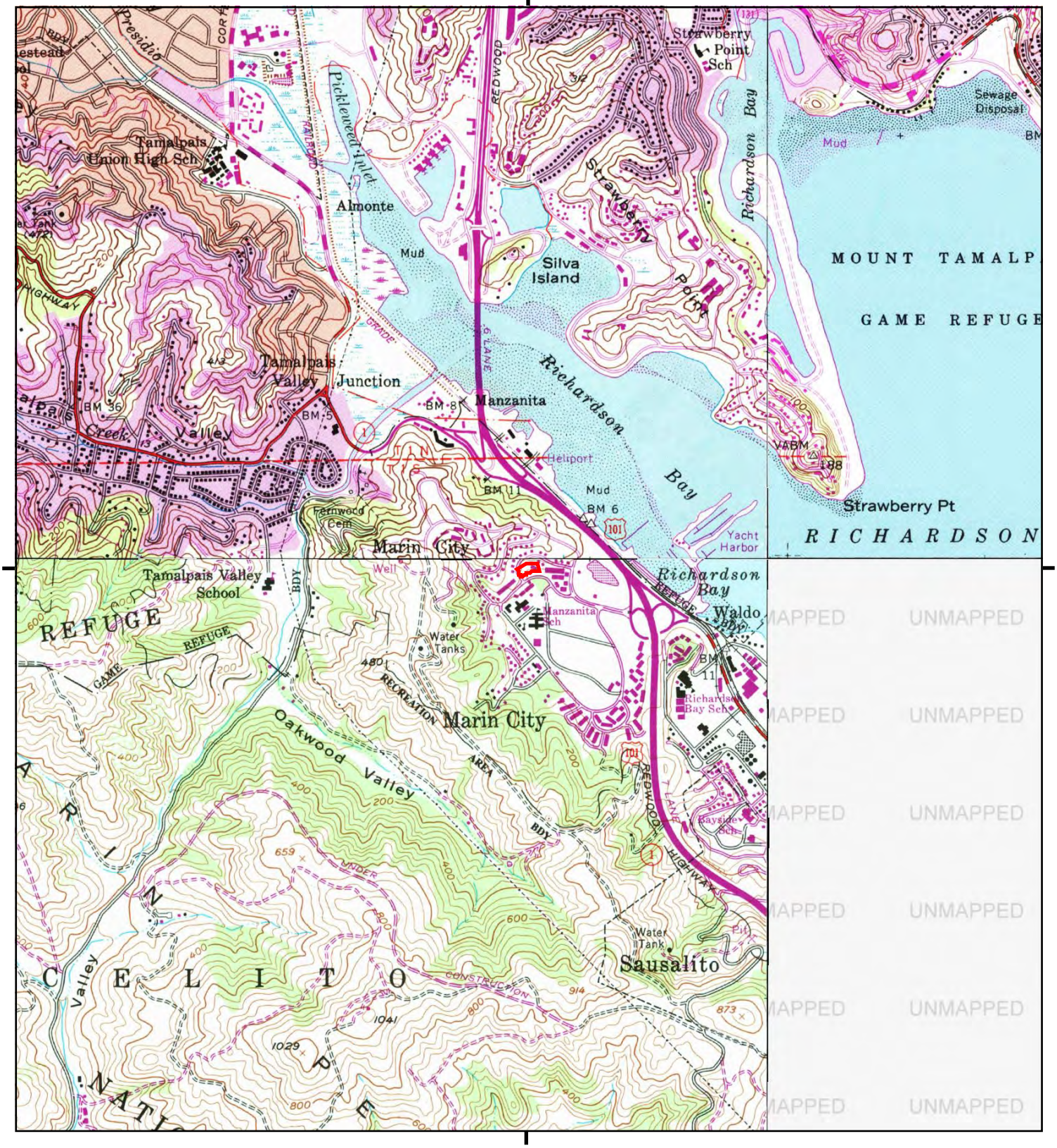
0 Miles 0.25 0.5 1 1.5

NW N NE
W E
SW S SE

NE, San Quentin, 1995, 7.5-minute
SE, San Francisco North, 1995, 7.5-minute
NW, San Rafael, 1995, 7.5-minute

SITE NAME: Commercial Property
ADDRESS: 825 Drake Avenue
Sausalito, CA 94965
CLIENT: KCE Matrix

N



This report includes information from the following map sheet(s).

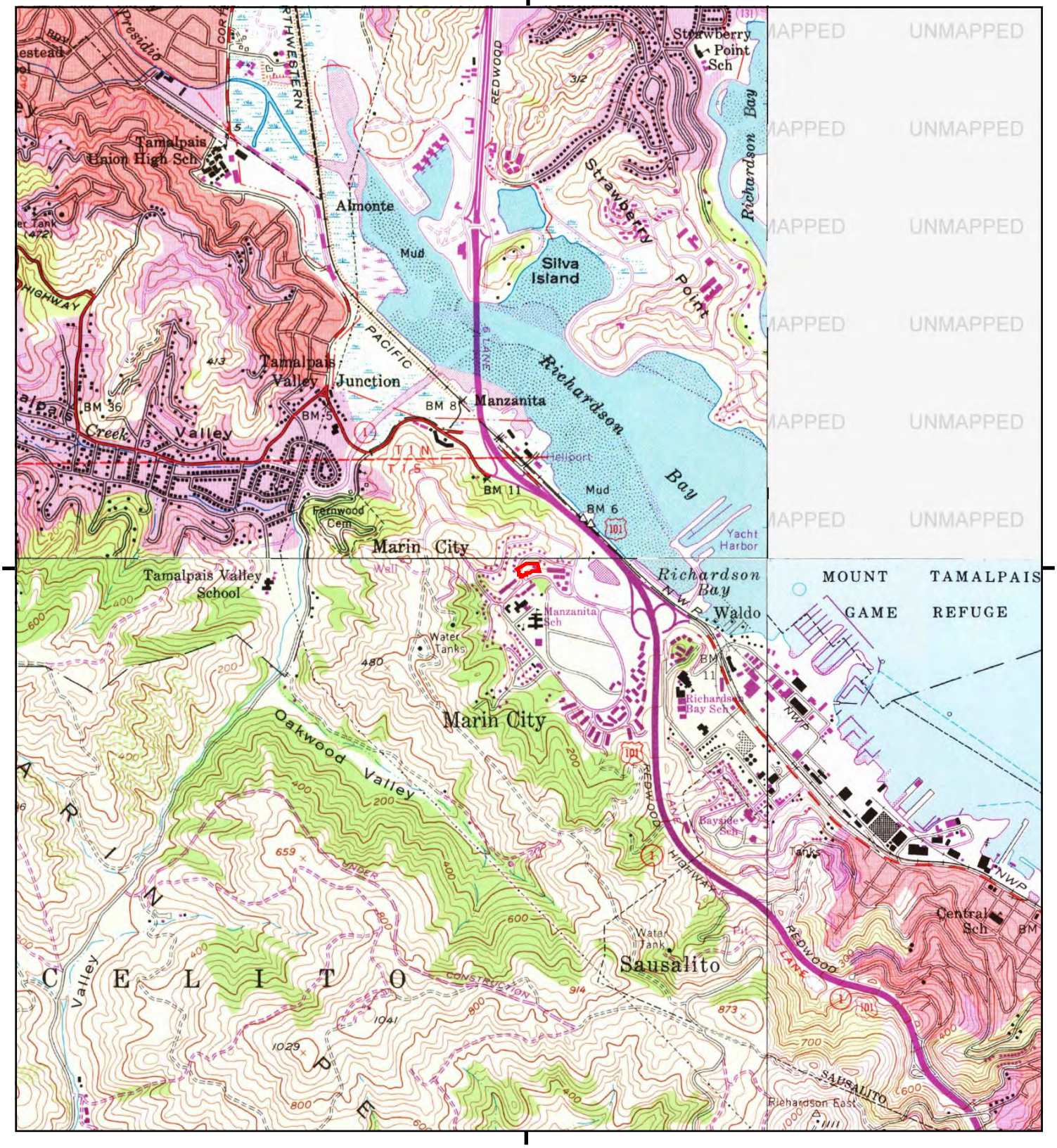
0 Miles 0.25 0.5 1 1.5

NW N NE
W E
SW S SE

TP, Point Bonita, 1978, 7.5-minute
NE, San Quentin, 1980, 7.5-minute
NW, San Rafael, 1980, 7.5-minute

SITE NAME: Commercial Property
ADDRESS: 825 Drake Avenue
Sausalito, CA 94965
CLIENT: KCE Matrix

N



This report includes information from the following map sheet(s).

0 Miles 0.25 0.5 1 1.5

NW N NE
W E
SW S SE

TP, Point Bonita, 1968, 7.5-minute
SE, San Francisco North, 1968, 7.5-minute
NW, San Rafael, 1968, 7.5-minute

SITE NAME: Commercial Property
ADDRESS: 825 Drake Avenue
Sausalito, CA 94965
CLIENT: KCE Matrix

N

This report includes information from the following map sheet(s).

0 Miles 0.25 0.5 1 1.5

NW N NE
W E
SW S SE

TP, Point Bonita, 1954, 7.5-minute
NE, San Quentin, 1959, 7.5-minute
SE, San Francisco North, 1956, 7.5-minute
NW, San Rafael, 1954, 7.5-minute

SITE NAME: Commercial Property
ADDRESS: 825 Drake Avenue
Sausalito, CA 94965
CLIENT: KCE Matrix

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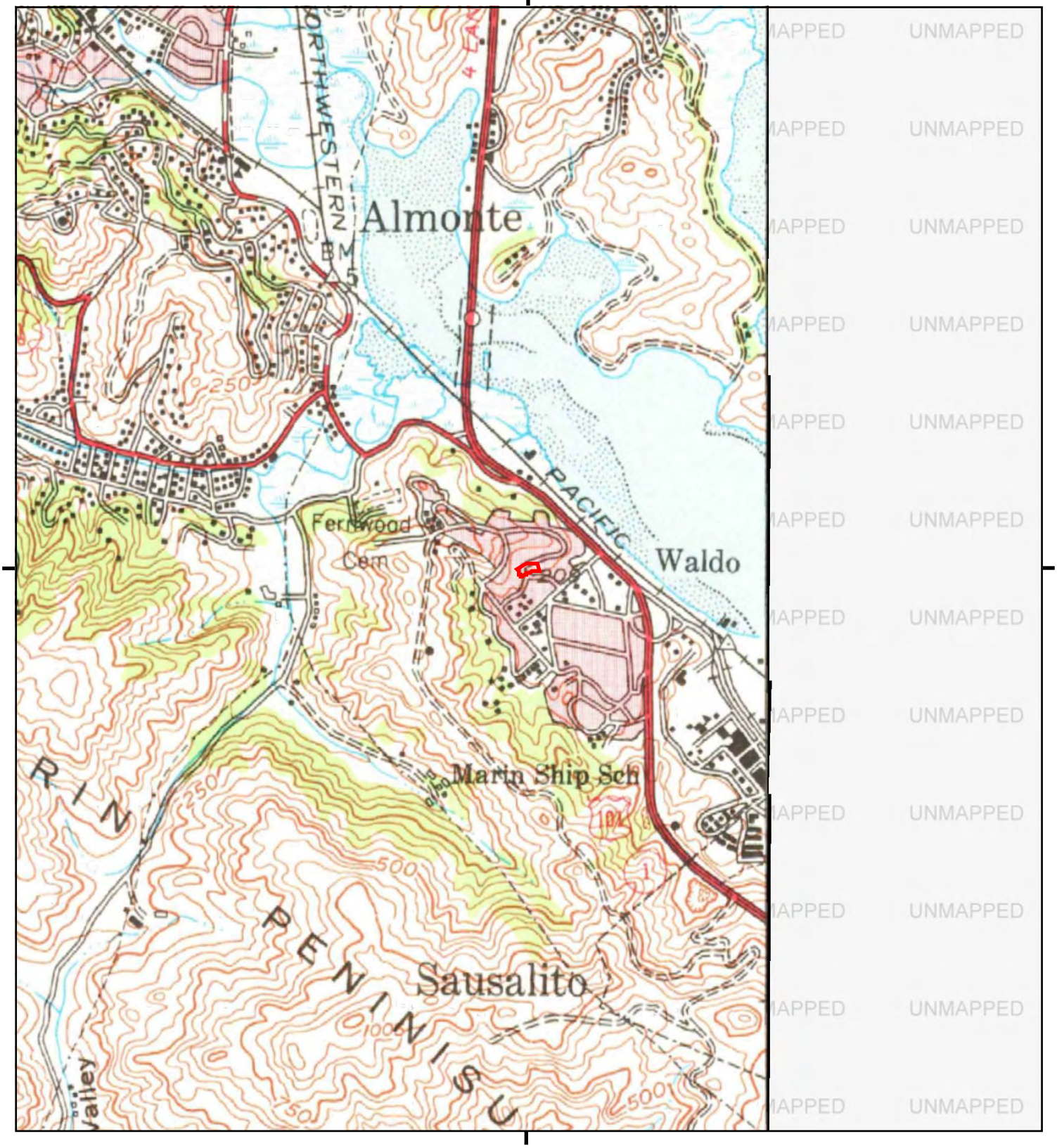


This report includes information from the following map sheet(s).

0 Miles 0.25 0.5 1 1.5

NW N NE
W E
SW S SE

TP, Mt. Tamalpais, 1950, 15-minute

SITE NAME: Commercial Property
ADDRESS: 825 Drake Avenue
Sausalito, CA 94965
CLIENT: KCE Matrix

N

This report includes information from the following map sheet(s).

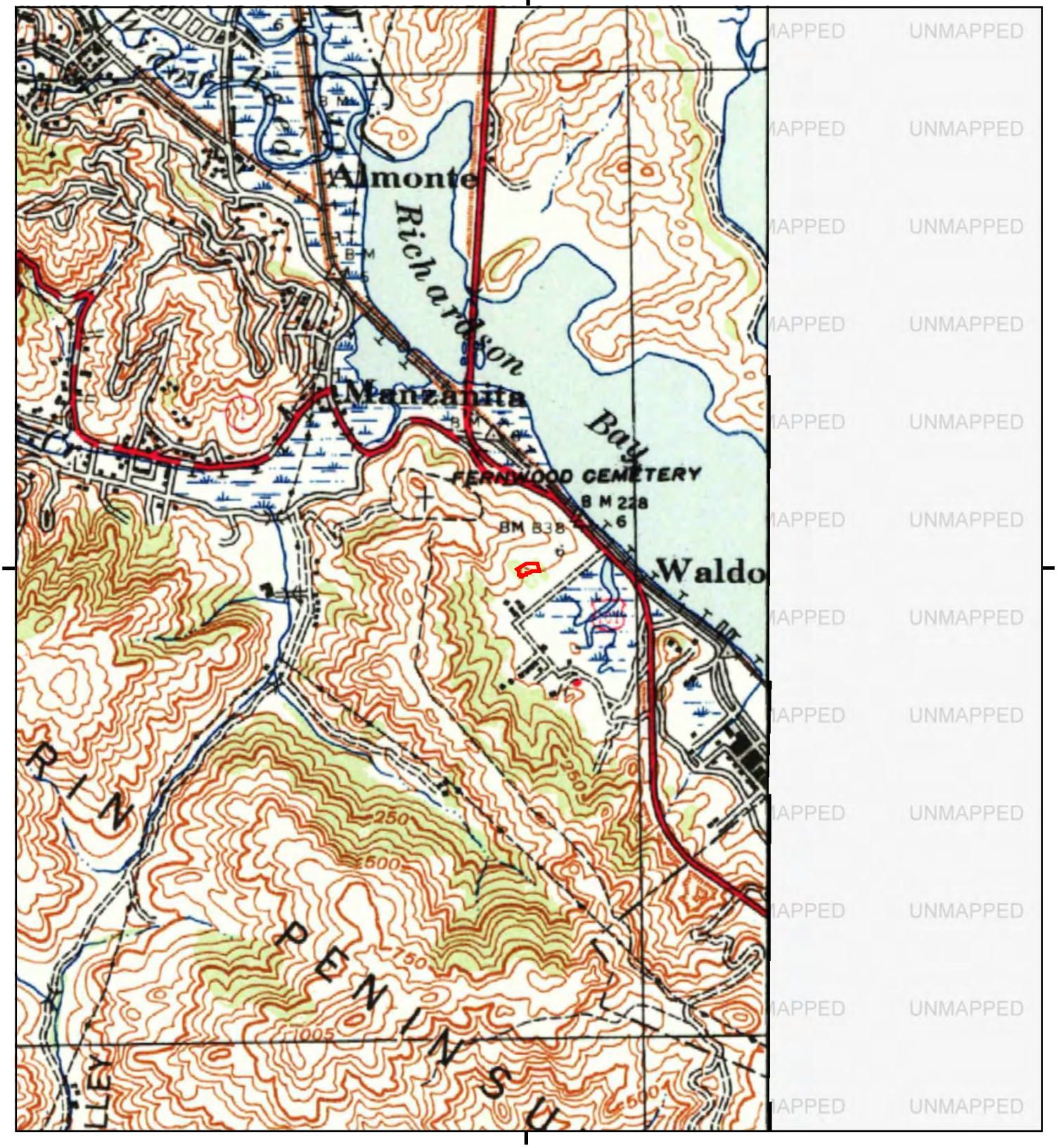
0 Miles 0.25 0.5 1 1.5

NW N NE
W E
SW S SE

TP, TAMALPAIS, 1947, 15-minute
E, SAN FRANCISCO, 1948, 15-minute

SITE NAME: Commercial Property
ADDRESS: 825 Drake Avenue
Sausalito, CA 94965
CLIENT: KCE Matrix

N



This report includes information from the following map sheet(s).

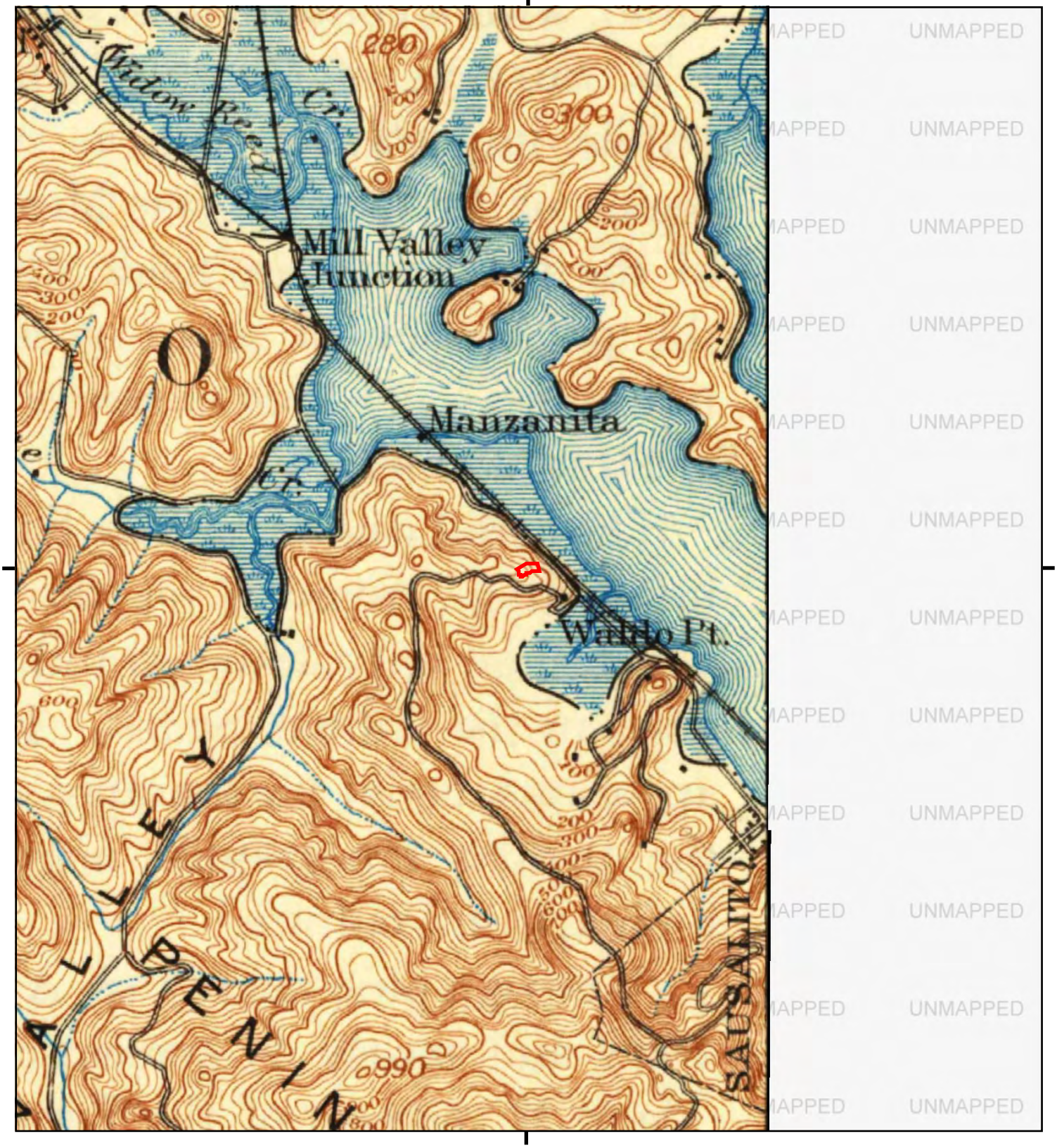
0 Miles 0.25 0.5 1 1.5

NW N NE
W E
SW S SE

TP, Tamalpais, 1941, 15-minute

SITE NAME: Commercial Property
ADDRESS: 825 Drake Avenue
Sausalito, CA 94965
CLIENT: KCE Matrix

N



This report includes information from the following map sheet(s).

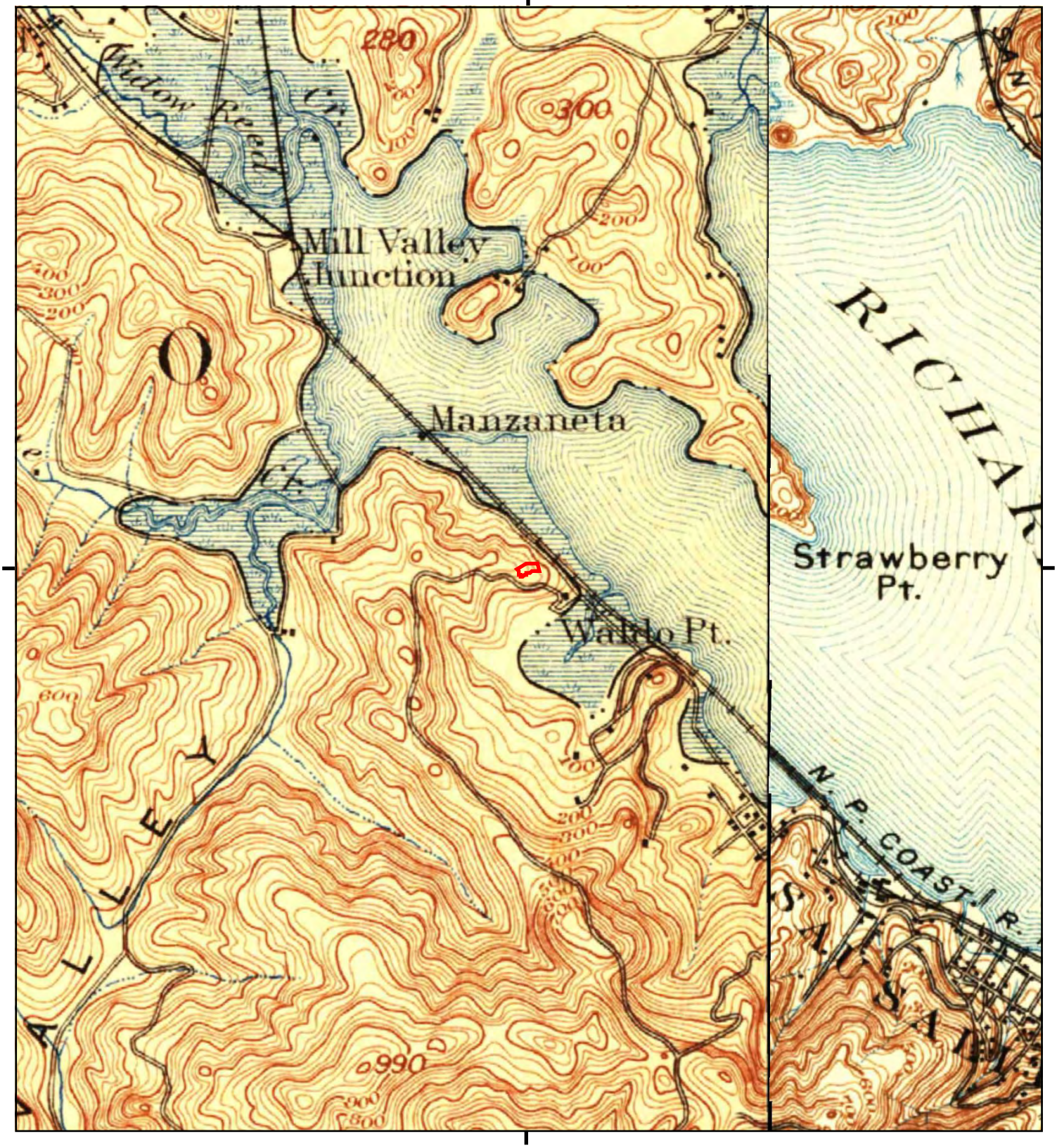
0 Miles 0.25 0.5 1 1.5

NW N NE
W E
SW S SE

TP, Tamalpais, 1940, 15-minute

SITE NAME: Commercial Property
ADDRESS: 825 Drake Avenue
Sausalito, CA 94965
CLIENT: KCE Matrix

N



This report includes information from the following map sheet(s).

0 Miles 0.25 0.5 1 1.5

NW N NE
W E
SW S SE

TP, Tamalpais, 1897, 15-minute
E, San Francisco, 1895, 15-minute

SITE NAME: Commercial Property
ADDRESS: 825 Drake Avenue
Sausalito, CA 94965
CLIENT: KCE Matrix

N

APPENDIX D-5

CITY DIRECTORY ABSTRACT

Commercial Property
825 Drake Avenue
Sausalito, CA 94965

Inquiry Number: 7216358.5
January 05, 2023

The EDR-City Directory Image Report

EDR® Environmental Data Resources Inc

6 Armstrong Road
Shelton, CT 06484
800.352.0050
www.edrnet.com

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Executive Summary

Findings

City Directory Images

Thank you for your business.
Please contact EDR at 1-800-352-0050
with any questions or comments.

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EXECUTIVE SUMMARY

DESCRIPTION

Environmental Data Resources, Inc.'s (EDR) City Directory Report is a screening tool designed to assist environmental professionals in evaluating potential liability on a target property resulting from past activities. EDR's City Directory Report includes a search of available city directory data at 5 year intervals.

RECORD SOURCES

EDR's Digital Archive combines historical directory listings from sources such as Cole Information and Dun & Bradstreet. These standard sources of property information complement and enhance each other to provide a more comprehensive report.

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RESEARCH SUMMARY

The following research sources were consulted in the preparation of this report. A check mark indicates where information was identified in the source and provided in this report.

Year	Target Street	Cross Street	Source
2017	☑	☑	EDR Digital Archive
2014	☑	☑	EDR Digital Archive
2010	☑	☑	EDR Digital Archive
2005	☑	☑	EDR Digital Archive
2000	☑	☑	EDR Digital Archive
1995	☑	☑	EDR Digital Archive
1992	☑	☑	EDR Digital Archive
1986	☑	☑	Haines Criss-Cross Directory
1981	☑	☑	Haines Criss-Cross Directory
1977	☑	☑	Haines Criss-Cross Directory
1973	☑	☑	Haines Criss-Cross Directory

FINDINGS

TARGET PROPERTY STREET

825 Drake Avenue
Sausalito, CA 94965

Year	*CD Image*	*Source*
DRAKE AVE		
2017	pg A5	EDR Digital Archive
2014	pg A10	EDR Digital Archive
2010	pg A15	EDR Digital Archive
2005	pg A21	EDR Digital Archive
2000	pg A27	EDR Digital Archive
1995	pg A31	EDR Digital Archive
1992	pg A34	EDR Digital Archive
1986	pg A37	Haines Criss-Cross Directory
1981	pg A39	Haines Criss-Cross Directory
1981	pg A40	Haines Criss-Cross Directory
1977	pg A42	Haines Criss-Cross Directory
1977	pg A43	Haines Criss-Cross Directory
1973	pg A45	Haines Criss-Cross Directory
1973	pg A46	Haines Criss-Cross Directory

FINDINGS

CROSS STREETS

Year	*CD Image*	*Source*
DONAHUE ST		
2017	pg. A2	EDR Digital Archive
2014	pg. A7	EDR Digital Archive
2010	pg. A12	EDR Digital Archive
2005	pg. A17	EDR Digital Archive
2000	pg. A23	EDR Digital Archive
1995	pg. A29	EDR Digital Archive
1992	pg. A33	EDR Digital Archive
1986	pg. A35	Haines Criss-Cross Directory
1986	pg. A36	Haines Criss-Cross Directory
1981	pg. A38	Haines Criss-Cross Directory
1977	pg. A41	Haines Criss-Cross Directory
1973	pg. A44	Haines Criss-Cross Directory

City Directory Images

Target Street	Cross Street	Source
-	✓	EDR Digital Archive

DONAHUE ST 2017

100	PANDA EXPRESS
101	ST ANDREW PRESBYTERIAN CHURCH
110	BURGER KING
115	ARTHUR, SHERIDAN
	GONZALEZ, WALKER F
	KAWOH, YAKER I
	RICE, MARQUEL
	SUVAL, SUSAN L
	WISE, ALEXIS
117	10 11 DESIGN
	BEAUCHAMP, BEVERLY E
	ESMAIL, UMER
	NAVARRO, GLORIA L
	ROBINSON, MARIE
	SAFAPAY, EBRAHBIM R
130	SLEEP TRAIN
	SLEEP TRAIN MATTRESS CENTERS
131	BRONSON, GUS E
	RIPPE, LUDMILA O
	SAWADA, KENGO
	TIMES, ERICA R
	YULIA, STRUSOVSKA
133	ANISSIMOVA, NATALYA
	AZAM, YAHYA
	DO, ANN T
	MOURA, JESSE
	TRUONG, TRUNG
141	RIDGEWAY APTS
150	CVS PHARMACY
	EVICTION SERVICE
153	BROWN, ANTHONY L
	CRERAR, DEBORAH A
	DOUNG, HAI T
	FOLEY, SUSAN
	HANSIA, MAHMOOD A
	HARPER, TIMOTHTY L
	HORTA, LINDSEY
	POCHOP, WENDY I
	TORTORICI, ANGEL
155	IGONKIN, GALINA G
	JANG, MUN S
	MORSE, NINA
	TORRES, MYRNA A
	TOVAR, JUAN C
	ZELENKOVSKAYA, LUBOV
157	BLUNCK, DIEGO
	ILANSIA, BILQUES M
	OSORIO, JESSE
160	BAR B QUE & CURRY HOUSE
	GATEWAY BEAUTY SUPPLY & SALON

DONAHUE ST 2017 (Cont'd)

160	MASSAGE ENVY
	NAILS NUMBER ONE
	SUBWAY
164	COUNTY OF MARIN
180	ADT SECURITY SERVICES
190	STARBUCKS
	STARBUCKS COFFEE
192	WEST MARINE
	WEST MARINE 1299 SAUSALITO
194	ROSS DRESS FOR LESS
196	OUTBACK STEAKHOUSE
206	SIDIBE, DJENEBA
208	GUST, MARLA K
212	YEUNG, CRYSTAL
222	OCONNOR, CAROLINE
224	WIRKERMAN, MAE D
226	LLAMAS, MANUEL
228	JOHNSTON, JOHN B
230	STIBICH, KEVIN C
232	MARSH, JENNIFER J
234	CHASE, STEVEN
238	MORGAN, JEROME G
252	KIDDER, DEIRDRE M
253	POOLE, LINDA R
254	LANGMORE, SUSAN E
255	LURSSEN, NEIL A
256	QUADRINI, PHILIP J
257	WIDNEY, BEVERLY T
258	ZEEMAN, MARK A
260	NEWMAN, NELLIE Y
261	HALL, NABILA C
262	BRIGHT, JASON A
263	ARSENAULT, STEPHEN
264	FITZGERALD, KAREN L
265	PETERSEN, GWYNNE M
268	LAMBERT, TERRY C
270	CHEN, HELEN J
271	SHENSA, PAUL M
272	MCMILLEN, SORINA
274	BREAUX, LISA M
277	QIU, BIHUA
279	HAMME, BARBARA J
282	BHAM, BUSHRA
284	MARIN AUDIO TECHNOLOGY LLC
	RIEHL, SHANE
286	MALEY, CATHERINE L
288	JOHNSON, WILLIAM F
290	VIGIL, RANDALL R
292	MCKNIGHT, JOHN A
296	KLINE, THOMAS E

DONAHUE ST 2017 (Cont'd)

298	AULIK, SUSAN
300	MAGURAN, MIRIAM
302	DORMAN, ANDREA
304	FREUSS, PAUL F
306	ADAMSON, EDWARD H
308	WAY, GINA G
310	SHARP, MARIA K
312	HARRISON, DAVID A
314	WEST, MICHAEL A
316	GOLDMAN, ERIC F
332	LU, HAIGUANG
334	KARTAVYA, RAINA
336	NIESEN, PETER E
400	GRUBER, MELISSA C
402	MILLER, BRADLEY A
406	BUCHANAN, STANLEE J
408	KLUGMAN, STELLA B
410	KROG, HAZLITT E
412	CLARK, PAUL D
414	AYALA, E
418	WAGNER, CYNTHIA D
420	HEALY, ALISON E
422	BUTT, ANTHONY J

Target Street	Cross Street	Source
✓	-	EDR Digital Archive

DRAKE AVE 2017

701	LEONARD, ASHLEY E
702	BARBARA, DICKENS
703	JACKSON, GALE D
704	HAYNES, ANGELA J
705	DIULIN, WLADIMIR A
	ETHNIC ARTS INSTITUTE
706	SUVER, SAMUEL J
707	BEAUCHAMP, LARRY J
708	RANDOLPH, BEN E
709	ALLEN, LESLIE K
710	PRICE, CAPRI
712	TALLEY, JAMES C
713	COLIN, JENNIFER L
716	MORGAN, TAMIKO R
717	CRAIG, GUY T
718	TIMES ENRICA
	TIMES, JOHN H
719	WESS, HOWARD K
721	WILSON, RUBY E
722	DUTT, SUNITA
723	SHEESHE, NADRA S
724	BAKER, CHARMAINE Y
725	PINSON, HOWELL J
726	HENSLEY, CORINNA R
727	BERMUDEZ, CHRISTOPHER J
728	PINSON, TRINETTE M
729	FINLEY, HORTENSE I
730	WIGGINS, LATANYA J
731	SAEZ, DEVIN F
732	FLEEGER, BARBARA
733	SLATER, BONNI R
735	DENNARD, GERALDINE
737	SNELL, OWEN
743	PORTER, GLORIA A
745	JONES, CLAIRE F
747	MORGAN, DONALD M
872	BROWN, ELAINE F
	CHADWICK, JOSEPH H
	DEMERS, KEN D
	DIAS, FABRICIO
	GONZALEZ, MARIA
	KRAVCHENKO, MIKHAIL
	MITCHELL, GARRIE R
	SABETI, HANA
	ZILBERG, ILIA B
874	ALTMAN, ALEXANDER
	KESELMAN, SASHA
	KHATAMI, FATEMEH
	KRYUKOV, MIKHAIL
	LOUIS, KATHERINE P

DRAKE AVE 2017 (Cont'd)

874	MAYS, CASSIDY
	SAMAYOA, LUIS E
	TOGUN, PAMELLA D
889	BATTLE, MELVIN
893	TIMES ENRICA
	TIMES, IDA L
897	MASON, BARBARA L
899	LEWIS, MARK L
903	SWEENEY, GLORIA D
907	BAILEY, KURTH L
909	BUEHLER, LYNN M
911	COLEMAN, GEORGE
915	FLOWER, JOE
917	BAKER, CHAETA
919	THOMAS, KIMBERLY M
921	KLIGERMAN, GREGORY I
923	FOSTER, ROBERT R
925	GASTON, KENDRICK
927	ADAMS, TENYSHA A
929	COOK, ALESIA R
931	FREEMAN, CYNTHIA V
933	JONES, DEANDRA
941	INGRAHAM-SR, GERALD
943	FOWLER, MICHAEL J
945	ELIZABETH, FREEMAN
947	MCROY, GAYLE
949	HOWARD, LEON O
951	HOLLINGSWORTH, ALIENE M
953	BEALE, KAREN S
957	BARRON, CASSANDRA
959	HOI, LOUISA C
965	ATKINS, MELVIN M
967	GREGOIRE, TANA N
971	THOMPSON, BLAKE
975	CLARK, GENE E
977	THOMAS, MELISSA J
979	HALL, JASMIN
981	DRAKE, L
983	AUSTIN, ANTOINE D
985	BASKETT, FOREST
987	TRUONG, DUC Q
989	STRIPLIN, TANEGA D
991	RUFFIN, LAKESHIA
993	PAGE, ALESHIA S
995	BANKS, CECILE N
997	MORGAN, MARQUICE D
999	JETT, DANIEL F

Target Street	Cross Street	Source
-	✓	EDR Digital Archive

DONAHUE ST 2014

100	PANDA EXPRESS
101	ST ANDREW PRESBYTERIAN CHURCH
110	BURGER KING
	KING BURGER
115	AZAM, LUTFIYA
	AZAM, YAHYA
	BORDERS, PHYLLIS
	GONZALEZ, WALKER F
	LEE, JAMIA
	SINGH, KULBIR
	URBINA, KERSON
	WISE, ALEXIS
117	10 11 DESIGN
	ALDANA, JAIME A
	HOGGES, TRANIA
	MODAN, ZAINEBIBI
	NOURI, IRANDOKHT
	ROSEN, NICK J
	SAFAPAY, IRANDOKHT
	SEGHIER, KARIMA
120	DOLLAR TREE
130	SLEEP TRAIN
131	BRONSON, BEVERLY A
	DOUNG, HAI T
	HANSIA, YUSU
	LAYA, RICO A
	RUTH, MARISA E
	SAWADA, KENGO
133	MOURA, JESSE
	NGUYEN, ANN T
	TRUONG, TRUNG
140	ADT SECURITY SERVICES
	RADIOSHACK
141	RIDGEWAY APTS
150	CVS PHARMACY
153	CRERAR, DEBORAH A
	HANSIA, MAHMOOD A
	HARPER, TIMOTHTY L
	PRADIA, MICHAELE
	WURTZ, MICHAEL T
155	ABDUL, LYN
	DUNCAN, SHERBAN A
	IGONKIN, GALINA G
	JANG, MUN S
	MORSE, NINA
	TOVAR, JUAN C
157	ILANSIA, BILQUES M
	MITCHELL, DAYNA A
	QUINTO, GRAZIELLE V
160	BADGER, ROB E

Target Street	Cross Street	Source
-	✓	EDR Digital Archive

DONAHUE ST 2014 (Cont'd)

160	BAR BQUE & CURRY HOUSE
	GATEWAY BEAUTY SUPPLY & SALON
	MASSAGE ENVY
	SUBWAY SANDWICHES
164	MARIN CITY LIBRARY
180	A & D T A D T ALARM & ADT SECURITY
	A D T 24 7 ALARM & SECURITY ALL
	ADT 24 7 A D T ALARM & SECURITY SA
	BEST BUY
190	OFF DUTY OFFICERS
	STARBUCKS COFFEE
192	BABIES R US
194	ROSS DRESS FOR LESS
196	OUTBACK STEAKHOUSE
202	RINCON, BEATRIZ B
204	BERDE, SATYARAJ S
206	YU, JIHUN
208	GUST, MARLA K
210	SEAVEY, CHARLES R
212	YEUNG, CRYSTAL
220	KREGER, CHARLOTTE L
222	MCLELLAN, JOHN B
224	WIRKERMAN, MAE D
226	LLAMAS, MANUEL
228	JOHNSTON, JOHN B
230	STIBICH, KEVIN C
232	OCCUPANT UNKNOWN,
234	DOUGLAS, LARRY
236	BROWN, DOUGLAS A
238	ARMOR, GENE R
240	BOWER, ED
250	OCCUPANT UNKNOWN,
251	RODIONOFF, NICHOLAS I
252	KIDDER, DEIRDRE M
253	POOLE, LINDA R
254	CONWAY, PAUL
255	LURSSEN, NEIL A
256	QUADRINI, PHILIP J
257	WILSON, BEVERLY T
258	ZEEMAN, MARK A
260	NEWMAN, NELLIE Y
261	HALL, NABILA C
262	BRIGHT, JASON A
263	OCCUPANT UNKNOWN,
264	RUDDELL, MICHAEL B
265	PETERSEN, GWYNNE M
268	LAMBERT, TERRY C
270	CHEN, HELEN J
271	SHENSA, PAUL M
272	HALL, BRIAN D

DONAHUE ST 2014 (Cont'd)

273	OCCUPANT UNKNOWN,
274	BREAUX, LISA M
275	VELASQUEZ, HUGO H
	YURIAR, NORMA A
277	LEMUS, ANTHONY M
279	HAMME, BARBARA J
280	TURNER, HAL E
282	BHAM, BUSHRA
284	BERKLEY, LAURENCE
	MARIN AUDIO TECHNOLOGY LLC
286	MALEY, CATHERINE L
290	VIGIL, RANDALL R
292	MCKNIGHT, JOHN A
294	NIELSON, DENNIS W
296	KLINE, THOMAS E
298	AULIK, SUSAN
300	DELAMERE, MARK
302	DORMAN, ANDREA
304	TURNER, DEBRA L
306	OCCUPANT UNKNOWN,
308	IRISH, KIMBERLY K
310	SHARP, JAMES L
312	PROVENZANO, MELISSA M
314	WEST, MICHAEL A
316	GOLDMAN, ERIC F
318	OCCUPANT UNKNOWN,
332	LU, HAIGUANG
334	KARTAVYA, RAINA
336	SMITH, SHIRWIN E
400	GRUBER, MELISSA C
402	MILLER, BRADLEY S
406	BUCHANAN, STAN
408	KLUGMAN, STELLA B
410	ALEXIA MOORE
	KROG, HAZLITT E
412	CLARK, PAUL D
414	AYALA, E
418	WAGNER, CYNTHIA D
420	HEALY, ALISON E
422	BUTT, ANTHONY J

Target Street	Cross Street	Source
✓	-	EDR Digital Archive

DRAKE AVE 2014

701	WASHINGTON, JESSIE M
702	DICKENS, CHARLES E
703	JACKSON, GALE D
704	WILLIAMS, MURDIS A
705	DIULIN, WLADIMIR A
706	OCCUPANT UNKNOWN,
707	BEAUCHAMP, LARRY J
708	RANDOLPH, BEN E
709	ALLEN, LESLIE K
710	PRICE, CAPRI
711	BARRETT, DIANE M
712	TALLEY, JAMES C
713	COLIN, JENNIFER L
715	WHEELOCK, LYNELL
716	MORGAN, BEATRICE J
717	CRAIG, GUY T
718	TIMES, JOHN H
719	DINAH, P M
721	ROQUEMORE, RUBY
722	DUTT, SUNITA
724	BAKER, DORIS A
725	PINSON, RORY
726	WILLIS, ROBERT A
727	BERMUDEZ, CHRISTOPHER J
728	OCCUPANT UNKNOWN,
729	FINLEY, HORTENSE I
730	WIGGINS, ORLANDO T
732	FLEEGER, BARBARA
733	SCHLOSSER, BONNI R
735	DENNARD, GERALDINE
737	SNELL, OWEN
741	GALLIVAN, KEVIN R
743	PORTER, GLORIA A
745	JONES, CLAIRE F
747	MORGAN, BARBARA
847	MAYS, PATRICIA
872	ATWOOD, THERESA M
	BROWN, ELAINE F
	CHADWICK, JOSEPH H
	COOK, ASHLEY L
	GONZALEZ, MARIA
	MITCHELL, GARRIE R
	PUERTAS, GERMAN
	SABETI, HANA
	VASKIN, ALEXANDER
874	ADDE, MOHAMMED
	GOMEZ, GLORIA
	KATAMI, FATEMEH
	KHACHATRYAN, ARMEN
	MCLEMORE, DEBI J

DRAKE AVE 2014 (Cont'd)

874	PRICE, MELINDA R
889	OCCUPANT UNKNOWN,
893	TIMES, IDA L
895	AUSTIN, SHAMILA J
897	MASON, BARBARA L
899	LEWIS, MARK L
901	OCCUPANT UNKNOWN,
903	SWEENEY, GLORIA D
905	OCCUPANT UNKNOWN,
909	BUEHLER, LYNN M
913	OCCUPANT UNKNOWN,
915	FLOWER, JOE
917	BAKER, CHAETA
919	THOMAS, KIMBERLY M
921	KLIGERMAN, GREGORY I
923	FOSTER, ROBERT R
925	GASTON, KENDRICK
927	OCCUPANT UNKNOWN,
931	FREEMAN, CYNTHIA V
933	ATKINSON, DEANDRA L
935	OCCUPANT UNKNOWN,
937	CONDRA, TRELLIS O
941	INGRAHAM-SR, GERALD
943	FOWLER, MICHAEL P
945	FREEMAN, ELIZABETH
949	COLEMAN, KEVIN M
951	HOLLINGSWORTH, ALIENE M
955	HILL, RICKY
959	OCCUPANT UNKNOWN,
961	DUBINSKY, SAMUIL
963	MOSE, ERIC B
965	ATKINS, MELVIN M
967	GREGOIRE, TANA
969	ROARY, DONNIE L
971	THOMPSON, SHIRLEY A
973	BROADFOOT, BELINDA G
975	CLARK, PARIS W
977	THOMAS, MELISSA J
979	OCCUPANT UNKNOWN,
983	AUSTIN, ANTOINE D
985	BASKETT, FOREST
987	TRUONG, DUC Q
989	ANGELICAL TOUCH & WELLNESS
	BRADLEY, DINEA
991	RUFFIN, LAKESHIA
993	PAGE, ALESHIA S
995	BANKS, CECILE N
997	MORGAN, YOLANDA M
999	JETT, DANIEL F

Target Street	Cross Street	Source
-	✓	EDR Digital Archive

DONAHUE ST 2010

100	PANDA EXPRESS
101	ST ANDREW PRESBYTERIAN CHURCH
110	BURGER KING
115	BAPORIA, MAIMUNA
	COOK, JEANIQUE E
	GREEN, NICOLE
	HOLCOMB, JENNIFER
	RHODES, GEORGE
	WISE, LATONIA A
117	FARITOUS, ALI
	LY, THAI P
	MODAN, ZAINEBIBI
	NONG, DANKHANA
	ROBERTS, ALETTE
	SAFAPAY, EBRAHBIM R
	SOUZA, EDINALVA A
120	DOLLAR TREE
130	SLEEP TRAIN
131	BRONSON, BEVERLY A
	HANSIA, YUSU
	LETHERESA, HONG
	PORTER, RONALD J
	SAWADA, KENGO
133	ARZETA, LUZ M
	BARROW, DEMETRIUSE L
	CRUSTO, ASHLEY
	DO, ANN T
	TRUONG, TRUNG
140	SOCCER PRO
141	RIDGEWAY APARTMENTS
150	CVS PHARMACY
153	ANDRADE, YESENIA
	HANSIA, MAHMOOD A
	NANDHA, SOHAN S
	PHELAN, AMY
155	DUNCAN, ELIANA E
	HAMID, ABDUL
	HOLDER, ERNESTO
	JANG, MUN S
	KHATANA, ABIDUR
	KOTOFF, CHRISTIANNE G
	WINKEL, JASON
157	DAVOL, JOY T
	MITCHELL, DAYNA A
	RODRIGUEZ, IDALIA H
160	BARSUL, DENNIS M
	GATEWAY BEAUTY SUPPLY
	GATEWAY CLEANERS
	GRILLER, JOHN
	LEE, ELIZABETH

Target Street	Cross Street	Source
-	✓	EDR Digital Archive

DONAHUE ST 2010 (Cont'd)

160	MASSAGE ENVY
	NAILS NUMBER ONE
	PARTIER, DONALD W
	SUBWAY
164	MARIN CITY LIBRARY
165	ROB BADGER PHOTOGRAPHY
170	LITTLE GYM OF SOUTH MARIN
180	BEST BUY
190	STARBUCKS
	STYLES FOR LESS
192	BABIES R US
194	ROSS DRESS FOR LESS
196	OUTBACK STEAKHOUSE
202	OCCUPANT UNKNOWN,
204	LLAMAS, MANUEL
206	LEE, SEUNGHUN
208	GUST, MARLA K
212	OCCUPANT UNKNOWN,
220	DUDLEY, RAY P
222	MAGUIRE, MIKE A
224	WIRKERMAN, MAE D
228	ALBANO, JOSEPH R
230	MERRIGAN, SEAN
232	GROSS, FRANCINE M
234	HONNIBALL, MARIAN T
235	BROWN, DOUGLAS
238	ARMOR, GENE R
240	BOWER, ED
251	BROWN, VALERIE A
252	SILVESTRI, RENETO N
253	POOLE, LINDA R
254	MAGNOTTI, VICTOR E
255	LURSSEN, NEIL A
256	QUADRINI, PHILIP J
257	OCCUPANT UNKNOWN,
258	ZEEMAN, MARK A
260	NEWMAN, NELLIE Y
261	HALL, NABILA C
262	GAYLES, YVETTE J
264	RUDDELL, MICHAEL B
265	PETERSEN, GWYNNE M
267	HEADLANDS 1 MAINTENANCE
268	OCCUPANT UNKNOWN,
270	CHEN, HELEN J
271	SHENSA, PAUL M
273	VANNORMAN, JUNKO V
274	BREAUX, LISA M
275	DALE, DAMIAN R
277	SETO, BETHANY
279	HAMME, BARBARA J

DONAHUE ST 2010 (Cont'd)

280 OCCUPANT UNKNOWN,
282 CROWDER, ROBERT B
284 OCCUPANT UNKNOWN,
286 COSMETIC IMAGE MARKETING
MALEY, CATHERINE L
288 OCCUPANT UNKNOWN,
290 VIGIL, RANDALL R
292 WEISS, STEPHEN J
294 OCCUPANT UNKNOWN,
296 KLINE, THOMAS E
298 VANKRIEDT, PAUL C
300 BURLE INDUSTRIES INC
MAGURAN, MIRIAM
302 DORMAN, ANDREA
304 FREUSS, PAUL F
306 OCCUPANT UNKNOWN,
308 HENDRY, ANNE M
310 TINNEL, MARIA
312 HARRISON, DAVID B
314 HEINEMAN, JOHN A
316 NEWSOM, BRENNAN J
318 OCCUPANT UNKNOWN,
330 SELTZER, MARGARET A
334 ORSINI, MONICA E
336 SMITH, SHIRWIN B
400 GRUBER, MELISSA C
402 LUNA-FINEMAN, SANDRA L
404 CROFT, BETHANN
406 BUCHANAN, STANLEE J
408 KLUGMAN, STELLA B
410 KROG, HAZLITT E
412 CIRULLI, JAMES J
414 AYALA, ELIZABETH
416 OCCUPANT UNKNOWN,
418 WAGNER, CYNTHIA D
420 MARTINEZ, LUIS
422 DEBUTT, VERONICA P
482 HAGELAND, BARRY

Target Street	Cross Street	Source
✓	-	EDR Digital Archive

DRAKE AVE 2010

701	OFF THE HOOK TELECOM
	WASHINGTON, JESSIE M
702	OCCUPANT UNKNOWN,
703	JACKSON, GALE D
704	MERDIS, ADAMS
705	DIULIN, WLADIMIR A
706	GRIFFIN, LAVERNA J
707	BEAUCHAMP, LARRY J
708	OCCUPANT UNKNOWN,
709	RARICK, SANDRA J
710	PRICE, BETTY D
711	CALLAHAN, KEITH
712	TALLEY, JAMES C
713	HARDY, RAYMOND
714	MAGEE, EVELYN
715	OCCUPANT UNKNOWN,
716	MORGAN, BEATRICE
717	CRAIG, GUY T
718	TIMES, JOHN H
719	OCCUPANT UNKNOWN,
720	WESTMORE, HARDY
721	ROQUEMORE, RUBY
724	BAKER, CHARMAINE Y
726	SMITH, STEFAN
727	TURNER, RONNIE A
728	PINSON, TRINETTE M
729	FINLEY, CURTIS R
730	BONNER, LARRY J
731	ESTES, POLLY J
733	COOK, SANTA R
737	OCCUPANT UNKNOWN,
739	OCCUPANT UNKNOWN,
740	MARIN CITY RECOVERY CTR
741	GALLIVAN, KEVIN R
743	PORTER, GLORIA A
745	JONES, RONNIE M
747	MORGAN, BARBARA F
850	MARIN COUNTY SHERIFFS DEPT
872	ASHBY, KIMBERLY J
	BROWN, ELAINE F
	CHADWICK, JOSEPH H
	GONZALEZ, JORGE
	GOZALEZ, JORGE
	GUSTAFSON, KATHLEEN J
	ISMAIL, AYUB Y
	MITCHELL, GARRIE R
	PEREIRA, GLADYS
	WILSON, GLENN
874	ANGALIA, MUHAMMAD A
	KATAMI, FATEMEH

DRAKE AVE 2010 (Cont'd)

874	LOPEZ, ANGEL
	MCLEMORE, DEBBIE
	PIERRE, KATHERINE
889	OCCUPANT UNKNOWN,
891	HILL, PATRECE
895	AUSTIN, SHAMILA
897	MASON, BARBARA L
899	LEWIS, MARK L
901	STRANG, CHARLES A
903	SWEENEY, GLORIA D
905	WHITE, LEE O
909	OCCUPANT UNKNOWN,
911	OCCUPANT UNKNOWN,
913	MOSE, ERIC
915	OCCUPANT UNKNOWN,
917	OCCUPANT UNKNOWN,
923	FOSTER, ALVENIA S
925	GASTON, FELECIA G
927	OCCUPANT UNKNOWN,
929	DAVIS, S O
931	FREEMAN, CYNTHIA V
933	JONES, WESLEY S
935	BURTON, NANCY
937	OCCUPANT UNKNOWN,
941	OCCUPANT UNKNOWN,
943	FOWLER, MICHAEL P
945	FREEMAN, ELIZABETH
947	MCROY, GAIL
949	OCCUPANT UNKNOWN,
951	HOLLINGSWORTH, ALIENE M
953	OCCUPANT UNKNOWN,
955	GREER, KAREN
959	OCCUPANT UNKNOWN,
961	MASON, RICHARD M
965	OCCUPANT UNKNOWN,
967	PAGE, SHNA
969	ROARY, DARRELL D
971	THOMPSON, SHIRLEY A
975	CLARK, NETTIE B
979	OCCUPANT UNKNOWN,
981	JONES, LETICIA A
983	AUSTIN, ANTOINE D
985	HAYES, DALVIN D
987	TRUONG, DUC Q
989	BAKER, MICHELLE
991	CONDRA, TRELLIS E
993	ADAMS, PAGE A
995	OCCUPANT UNKNOWN,
997	OCCUPANT UNKNOWN,
999	GARRARD, JUNETTA D

Target Street	Cross Street	Source
-	✓	EDR Digital Archive

DONAHUE ST 2005

100	PANDA EXPRESS 1001
101	SAINT ANDREW PRESBYTERIAN CHURCH
110	FRANCISCO FOODS INC
115	BAPORIA, MAIMUNA
	CAMPBELL, DOUGLAS L
	COCKRUM, ALICIA
	COOK, JEANIQUE E
	FARIA, LUCIANO R
	HOLCOMB, SARAH
	LAUER, T
	LYONS, LEIGH
	WISE, LATONIA
117	ADAMS, ANTWANETTE
	BANO, NOSHABA
	DESOUZA, KARINA
	FARIA, RENATO
	FARRUKH, NEELOFAR
	GINGOLD, MAYA R
	HAACK, JEFERSON
	HAINES, JEFFREY D
	MICHAUD, SHARI
	NOURI, IRANDOKHT
	PETERSON, F
	SAFAPAY, EBRAHBIM
	SOUZA, MARINA
119	HOOVER, JEREMY
120	BOAT US
130	BLOCKBUSTER INC
131	CUEVAS, GABRIEL
	ELASTICBITCH
	GRAY, NATHALIO
	PETERS, ERICA R
	ROYALL, BETH
	VERGARA, LAURA A
	WALDRON, JOSEPH F
133	ARZETA, LUZ M
	BARROW, DEMETRIUSE
	HAMILTON, R
	JOE, KRISTINE D
	LANDA, GLORIA
	MENISE, DANYEL
	WALL, MICHAEL
140	RADIOSHACK
141	RIDGEWAY APARTMENTS
150	LONGS DRUG PHARMACY # 401
153	BACCE1
	DASILVA-SASSER, VALERIA
	FAUCHARD, ANA
	RONETTA, LEWIS
155	AHMAD, MUSHTAQ

Target Street	Cross Street	Source
-	✓	EDR Digital Archive

DONAHUE ST 2005 (Cont'd)

155	BEARD, JENNIFER A
	BRYAN, DONA
	CARB, GREGG
	DUNCAN, ELIANA
	HAINES, DEBORAH
	KELSEY, AARON O
	MULLEE, JENNIFER A
	MUMBAI, BASHIR
	WINDISCH, CHANGA
	WINKEL, JASON
157	BOHAN, WILLIAM A
	BRAITHWAITE, STEVEN R
	DAVOL, JOY T
	DU, JACKIE
160	BARSUL, DENNIS M
	BELL, MICHAEL L
	CEPEDA ENTERTAINMENT
	DICK, TIMOTHY W
	FORESTER, ELIZABETH
	GREAT BIG STUFF INC
	GRILLER, JOHN
	HARING, MARY
	HEIMBURGER, CHRISTIAN I
	LAZZARI, RICHARD L
	LEVEQUE, MEGHAN M
	MDP
	MOJO DOJO
	MORRIS, MARK S
	NAILS NUMBER ONE
	PARTIER, DONALD
	POST N PLUS
	POST, N
	SMALLEY, SHARON C
	SMI SHAW MANAGEMENT CO
	STANTON, EDWARD M
	WINTER, NITA M
164	MARIN CITY LIBRARY
190	COFFEE, SMITH
	STARBUCKS COFFEE
194	ROSS STORES
196	OUTBACK STEAKHO
202	RINCON, BEATRIZ B
204	SHIRK, DAVID A
206	LEE, SEUNGHUN
208	GUST, MARLA K
210	MONDO SURF & MUSIC
	OLMSTEAD, JIMMI S
222	JASON, JOHNSON
224	COX, JAMES S
226	TAYLOR, CHARLES W

Target Street	Cross Street	Source
-	✓	EDR Digital Archive

DONAHUE ST 2005 (Cont'd)

228 HART, CATHERINE M
230 OCCUPANT UNKNOWN,
232 AUGE, N L
234 HONNIBALL, MARIAN T
235 BROWN, DOUGLAS
236 GOLDEN COAST MANAGEMENT SERVICES
238 OCCUPANT UNKNOWN,
VISUALS
240 BOWER, ED
250 KLAAS FOUNDATION FOR CHILDREN
KLAAS, MARK
251 ESHIMA, SHINJI T
252 OCCUPANT UNKNOWN,
253 POOLE, LINDA R
254 OCCUPANT UNKNOWN,
255 LURSSEN, NEIL A
256 ESCAPE SKINCARE
QUADRINI, PHILIP J
257 FREDRICKSON, KEVIN F
258 PARENT, LINDA
260 NEWMAN, NELLIE Y
261 HALL, ROBERT H
262 GAYLES, YVETTE J
263 JENNISON, MARCO D
264 RUDDELL, MICHAEL B
265 PETERSEN, GWYNNE M
268 OCCUPANT UNKNOWN,
270 CHEN, HELEN
DAW ENTERPRISES SERVICES
271 SHENSA, PAUL M
273 BRENN, W B
274 BREAUX, LISA M
275 ROGERS, JAY H
277 TANAKA, ROLAND
279 HAMME, BARBARA J
280 ROTH, IRIS R
282 CROWDER, ROBERT B
284 WU, JULIA S
286 WILLIAMSON, BRIDGET A
288 OCCUPANT UNKNOWN,
290 DENNEY, MARK M
292 WEISS, STEPHEN J
WRITER INK
294 NIELSON, DENNIS W
296 RUBERY, CATHERINE A
300 MAGURAN, MIRIAM
302 FERRARI, INEZ A
304 FREUSS, PAUL F
306 SNOW, PETER W
308 HENDRY, ANNE M

DONAHUE ST 2005 (Cont'd)

310	SHARP, JAMES L
314	HEINEMAN, JOHN A
316	NEWSOM, BRENNAN J
330	SELTZER, MARGARET A
332	HOYT, WHITNEY S
334	MEANNING, JEANNE
336	SMITH, SHIRWIN E
404	SHOWFER, MARLA J
406	BUCHANAN, STANLEE J
408	KLUGMAN, JULIAN S
410	KROG, HAZLITT
412	OCCUPANT UNKNOWN, SELBY GROUP
414	AYALA, E
416	ROSS, EDGAR M
418	WAGNER, CYNTHIA D
420	OCCUPANT UNKNOWN,
422	GREENER, CHRISTOPHER
482	HAGELAND, BARRY

Target Street	Cross Street	Source
✓	-	EDR Digital Archive

DRAKE AVE 2005

701	WASHINGTON, JESSIE M
702	OCCUPANT UNKNOWN,
703	JACKSON, ELIZABETH
704	MERDIS, ADAMS
705	MCREYNOLDS, LASALLE S
706	GRIFFIN, LAVERNA J
707	A PERFECT HOME CHILD CARE
	BEAUCHAMP, LARRY J
708	OCCUPANT UNKNOWN,
710	PRICE, BETTY D
711	CALLAHAN, KEITH
712	TALLEY, JAMES C
713	VAMOER, DESIREE A
714	MAGEE, EVELYN
715	OCCUPANT UNKNOWN,
718	TIMES, JOHN H
719	OCCUPANT UNKNOWN,
720	JOHNSON, LEE A
722	OCCUPANT UNKNOWN,
724	BAKER, CHARMAINE Y
725	OCCUPANT UNKNOWN,
727	OCCUPANT UNKNOWN,
728	PINSON, TRINETTE
729	FINLEY, CURTIS R
730	WIGGINS, ORLANDO T
731	THOMAS, LEE M
732	CLARK, LEROY A
733	WILLIAMS, MATTHEW
735	OCCUPANT UNKNOWN,
737	OCCUPANT UNKNOWN,
739	OCCUPANT UNKNOWN,
741	GRIFFIN, LONNIE D
743	PORTER, GLORIA A
745	JONES, CLAIRE F
747	MORGAN, BARBARA F
825	VILLAGE BAPTIST CHURCH
847	MAYS, PATRICIA
872	ATWOOD, CURTIS P
	BHARUCHA, IBRAHIM J
	BOWEN, NICOLE A
	DEABREU, RUTE
	ISMAIL, AYUB Y
	LARKSPUR FAMILY WASH & DRY
	MITCHELL, GARRIE R
	YAHRAES, GEORGE H
	YOUSAF, MUHAMMED
874	GREEN, MARIE
	HARRIS, MARY A
	MAYS, CASSIDY
	MCLEMORE, DEBI

DRAKE AVE 2005 (Cont'd)

874	RODRIGUEZ, ERIC
	SOUZA, CARLOS
889	OCCUPANT UNKNOWN,
891	HILL, ROBIN L
893	TIMES, IDA L
895	THOMPSON, SHIRLEY A
897	MASON, BARBARA
899	LEWIS, MARK L
901	STRANG, CHARLES
903	WHITE, LIONEL
905	WHITE, LEE O
909	OCCUPANT UNKNOWN,
911	PORTER, GLADYS N
913	OCCUPANT UNKNOWN,
915	OCCUPANT UNKNOWN,
917	BROOKES, ALLEN F
919	OCCUPANT UNKNOWN,
921	PEOPLES, KITTREL
923	GRIFFIN, MELODY
925	GASTON, FELECIA G
927	OCCUPANT UNKNOWN,
931	FREEMAN, CYNTHIA
933	OCCUPANT UNKNOWN,
935	BASKETT, FOREST
937	CONDRA, TRELLIS E
941	OCCUPANT UNKNOWN,
943	OCCUPANT UNKNOWN,
945	ADAMS, PAGE A
947	JACKSON, LAROY
949	OCCUPANT UNKNOWN,
951	HOLLINGSWORTH, ALIENE
953	BEALE, KAREN S
	HOOKERSHAMAN NET
959	HUNT, VIOLA T
965	OCCUPANT UNKNOWN,
967	OCCUPANT UNKNOWN,
971	OCCUPANT UNKNOWN,
975	CLARK, NETTIE B
977	RHODES, MEREDITH T
979	CHAPMAN, ALLEN
981	JONES, LETICIA A
983	AUSTIN, BETTY L
985	HAYES, DALVIN D
989	FELDMANN, MARGARET
991	OCCUPANT UNKNOWN,
995	OCCUPANT UNKNOWN,
997	COLEMAN, FANNIE M
999	GARRARD, JUNETTA D

Target Street	Cross Street	Source
-	✓	EDR Digital Archive

DONAHUE ST 2000

100	TACO BELL
101	ST ANDREW PRESBYTERIAN CHURCH
110	BURGER KING
	OCCUPANT UNKNOWN,
115	BARRIENTOS, BYRON H
	BRADLEY, J M
	CABRERA, LEANDRO A
	CAMPBELL, DOUGLAS
	FARIA, LUCIANO R
	FISHER, KELLY
	GREDING, CARLIE A
	HALLER, WILLIAM F
	HOLMES, BETH
	MERRICK, BRADLEY J
	MORALES, INGRID D
	PEARSON, KIRK M
	PICASSO, MERRICK S
	WHITMER, BRIAN J
117	BAKER, K J
	CAMPORALE, CAMILLE
	LAZARYEV, ALEKSEY
	PAWLAK, LYNETTE M
	SAFAPAY, EBRAHIM
	SHUKHAT, FAINA
	SILVERIO, DIANNE E
120	OCEAN WORLD AQUATICS
	PAYLESS SHOE STORE
130	BLOCKBUSTER VIDEO
131	COOMBER, GRAEME
	HATEM, ANTOINE
	HOWARD, STEPHEN G
	LUSBY, SHANE G
	MARTINEZ, DAN
	SIPES, RUBY
	STYKA, THERESA M
	WALDRON, JOSEPH F
	WRIGHT, CHRIS
133	ALLEN, JAMES C
	CANDIANI, ERIK A
	GANZ, AIMEE M
	LUCIER, DEBORAH K
	OCONNOR, FRANK P
	PEASE, J
	PHILLIPS, TRACY
	REMINGTON, MARK A
	VOLL, RENEE
140	BEAUTY IMAGE SALON BARBER SHOP
	HEAL THY KIDDS BOOLKS & MORE
	RADIO SHACK
	YUMI YOGURT

DONAHUE ST 2000 (Cont'd)

141	RIDGEWAY APARTMENTS AT MARIN CITY USA
	STYKA, THERESA M
150	LONGS DRUG STORES MARIN CITY
153	BOUHMOUCH, AMAL
	DELUSCA, NATACHA
	DOBKOWSKI, JUDY K
	FIECOAT, FELIZ
	GREGG, ANTHONY
	HAMPTON, H S
	HENDRICKSON, TERI L
	SCHILLER, CARRIE A
155	DUNCAN, SAMUEL
	HINES, MARIAN
	JACKSON, K
	NIELSEN, CHRISTY M
	SULLIVAN, JANE T
157	DINERSTEIN, HARVEY
	GRANT, KATE
	MOSES, JASON T
	NATION, ANDREW C
160	ALARCON, MAPPY C
	APOLLO DRY CLEANERS
	CHAU, THAO
	GATEWAY BEAUTY SUPPLY
	GENERAL NUTRITION CENTER
	HENDERSON, GUY M
	HSIEH, YUNG S
	LAM, LEO T
	LAMANTIA, ROBERTO
	LE, YEN T
	MANSOUR, PASIMA
	MARIN CITY POLICE DEPARTMENT
	MCGEE, EILEEN D
	NAILS NUMBER ONE
	NELSON, OLIVIA P
	PARENT, CAHE E
	PARTIER, DONALD W
	POST N PLUS
	RANALLO, MICHAEL J
	RED BOY PIZZA MARIN CITY
	RICKSHAW CHINESE FOOD
	ROLBIN, SHARON
	STERN, ROB
	TELLES, ANDREA J
	THOMPSON, DEBORAH
	VANTIL, MARK E
	VENTURA, CHARLES
164	MARIN CITY LIBRARY
180	BEST BUY
190	BIG & TALL CASUAL MALE

DONAHUE ST 2000 (Cont'd)

190	COFFEE SMITH
	COFFEE, SMITH
	FABRIX
192	PETSMART
194	ROSS DRESS FOR LESS
196	OUTBACK STEAKHOUSE
202	PORTA, EMILIO
206	ASANO, DAVID F
208	CHOICE PERFORMANCE INCORPORATED
	GROUNDS, C
210	SIMPSON, E F
212	BRADSHAW, DEAN H
220	OLIVA, C
222	FALK, KIRSTIN
224	GORDON, MARYJO
226	ZHANG, JIN
228	COSTA, LUCY A
230	BLACKBURN, VALERIE K
232	OCCUPANT UNKNOWN,
234	OCCUPANT UNKNOWN,
236	NIELSEN, DOUG
238	OCCUPANT UNKNOWN,
250	OCCUPANT UNKNOWN,
251	ESHIMA, SHINJI
252	SHERMAN, MARY P
253	POOLE, LINDA R
254	LANGMORE, IAN G
255	LURSSEN, JEAN
256	QUADRINI, PHILIP
257	FREDRICKSON, KEVIN F
258	PALMER, LYNN M
260	BARIGIAN, DEBORAH
261	TODD, JAMI B
262	ZANK, ELEN
264	RUDDELL, MICHAEL
267	HEADLANDS 1 MAINTENANCE
268	BRUSH, HOLLIS A
	LOURIA, D L
270	MAGGAL, ELANA
	WEINFELD, DAVID A
271	SHENSA, PAUL M
272	CAUGHEY, DANIEL
273	OCCUPANT UNKNOWN,
274	BOSMAN, ALEX
275	BRANDNER, TIMOTHY M
277	ADAMS, V
279	HAMME, BARBARA J
280	ROTH, IRIS
282	CROWDER, ROBERT B
284	OCCUPANT UNKNOWN,

DONAHUE ST 2000 (Cont'd)

286	OCCUPANT UNKNOWN,
288	HINCKLEY, ANGELA
290	DENNEY, MARK M
292	WEISS, STEPHEN J
294	GLENN, JAMES V
296	RUBERY, C
298	OCCUPANT UNKNOWN,
300	OCCUPANT UNKNOWN,
302	FERRARI, INEZ A
304	TURNER, DEBRA
306	HOLLA, MEERA
	SNOW, PETER
308	HENDRY, ANNE
	SCHAUF, STACY
310	ELLIOTT, KYLE
312	MOSS, MARCIE D
314	JONES, JON P
	SELIGSON, STEVEN
316	KILDEA, JEAN L
318	OCCUPANT UNKNOWN,
330	SELTZER, M A
334	ORSINI, MONICA E
336	SMITH, SHIRWIN E
400	CAMPANALE, PETER
402	OCCUPANT UNKNOWN,
404	SHOWFER, MARLA J
406	BUCHANAN, STANLEE J
408	KLUGMAN, JULIAN
412	SELBY, J L
414	AYALA, E
416	OCCUPANT UNKNOWN,
418	WILLS, MAX
420	HEALY, ALISON E

Target Street	Cross Street	Source
✓	-	EDR Digital Archive

DRAKE AVE 2000

700	MARIN CITY CHURCH OF GOD
701	OCCUPANT UNKNOWN,
702	DICKENS, BARBARA J
703	OCCUPANT UNKNOWN,
704	OCCUPANT UNKNOWN,
705	MCREYNOLDS, LASALLE
706	GRIFFIN, LAVERNA J
707	CALLAHAN, MARIE A
708	RANDOLPH, BEN E
709	OCCUPANT UNKNOWN,
710	HOLTZCLAW, THOMAS R
711	OCCUPANT UNKNOWN,
712	OCCUPANT UNKNOWN,
713	MILLER, RON
714	MAGEE, EVELYN
715	WHEELOCK, LYNELL
718	TIMES, JOHN
719	MILLER, D
720	JOHNSON, LEE A
721	OCCUPANT UNKNOWN,
724	OCCUPANT UNKNOWN,
726	WILLIS, ROBERT A
728	PINSON, HOWELL
729	TRAN, TUYET
731	THOMAS, LEE M
733	WILLIAMS, MAEBELL B
735	OCCUPANT UNKNOWN,
737	GOWDER, M
739	HOLLINGSWORT, LINDA J
741	GRIFFIN, DAN L
743	PORTER, GLORIA A
745	JONES, CLAIRE F
747	MORGAN, BARBARA F
825	VILLAGE BAPTIST CHURCH THE
872	DUONG, SON
	LOBL, DANIEL A
	MUIR, KIM V
	SANCHEZ, MARITZA E
	SOUTHAM, BERNARD J
	SPITLER, HARLEY
	STERN, C M
	VARKEVISSER, KIM
	YAHRAES, GEORGE
874	GRUPP, VELVA J
	GUNNELL, SCOTT
	MARTIN, ERIC E
	MODAN, HASHIM
	SCHOOLEY, KAREN
891	OCCUPANT UNKNOWN,
893	OCCUPANT UNKNOWN,

DRAKE AVE 2000 (Cont'd)

895	OCCUPANT UNKNOWN,
899	LEWIS, MARK
903	OCCUPANT UNKNOWN,
905	WHITE, DOROTHY L
907	OCCUPANT UNKNOWN,
909	OCCUPANT UNKNOWN,
911	OCCUPANT UNKNOWN,
913	PONDEROSA ESTATE INCORPORATED
915	OCCUPANT UNKNOWN,
917	BROOKES, IRVIN
919	THOMAS, K M
923	FOSTER, ALVENIA S
	GRIFFIN, MELODY
925	OCCUPANT UNKNOWN,
	PERFORMING STARS OF MARIN
927	OCCUPANT UNKNOWN,
929	OCCUPANT UNKNOWN,
931	FREEMAN, CYNTHIA
933	OCCUPANT UNKNOWN,
937	CONDRA, NORA L
943	OCCUPANT UNKNOWN,
949	HOWARD, S
951	CLARK, PATRECE M
953	STREET, TRACYE E
955	KELLY, SHAWNI
957	OCCUPANT UNKNOWN,
959	HUNT, VIOLA
961	WILLIAMS, RUTH
963	ROBERTS, JOYCE F
965	COLLINS, WALTER P
971	THOMPSON, SHIRLEY A
973	BELL, GENE S
975	CLARK, NETTIE
979	OCCUPANT UNKNOWN,
983	AUSTIN, BETTY
989	OCCUPANT UNKNOWN,
991	OCCUPANT UNKNOWN,
997	COLEMAN, ALICE

Target Street	Cross Street	Source
-	✓	EDR Digital Archive

DONAHUE ST 1995

100	NOVAS BARBEQUE
147	AMANI BEAUTY SUPPLY
	BREAD N BETTER
	CHI CHI COCCO ENTERPRIZ LTD
	MARIN CITY ENTERPRISE CTR
	MARIN CITY FLEA MARKET
	MARIN CITY VIDEO
	NEW BEGINNINGS CONSIGNMENTS
	SCOOP
	WRIGHT BOOKS FOR CHILDREN
204	OCCUPANT UNKNOWNN
206	ASANO, DAVID F
	PHOTO WASTE RECYCLING CO
208	STREHL, JOHN
209	OCCUPANT UNKNOWNN
210	DUNN, JONNA M
212	SARRELL, STEPHEN C
220	OCCUPANT UNKNOWNN
222	FRANKS, JOHN P
224	KAMATA, LEONA
	MURRAY, THOMAS JR
226	OCCUPANT UNKNOWNN
228	COSTA, LEONARD
230	DANZ, STEPHEN
232	OCCUPANT UNKNOWNN
234	VANFLEET, JOHN
236	COTTER, CYNTHIA
238	WILLIAMS, JOE A
250	WILLIAMS, RICHARD
251	OCCUPANT UNKNOWNN
252	OCCUPANT UNKNOWNN
253	POOLE, LINDA R
254	BOWER, ED
255	OCCUPANT UNKNOWNN
256	QUADRINI, PHILIP
258	PALMER, LYNN
260	OCCUPANT UNKNOWNN
261	MCDANIEL, ROBERT
262	ZANK, ELEN
263	OCCUPANT UNKNOWNN
264	RUDDELL, MICHAEL
268	KNIERIM, SKIP
	WHITE, SEAN D
270	OCCUPANT UNKNOWNN
271	WALTERS, CARL
272	OCCUPANT UNKNOWNN
273	OCCUPANT UNKNOWNN
274	OCCUPANT UNKNOWNN
275	NILAN, CHARLES
277	BATES, DEBORAH

DONAHUE ST 1995 (Cont'd)

279	HAMME, BARBARA J
280	ROTH, IRIS R
282	CROWDER, ROBERT B
284	OCCUPANT UNKNOWNN
286	WILLIAMSON, B
288	HINCKLEY, ANGELA
292	WOODARD, JEAN
294	IRWIN, HUGH
296	OCCUPANT UNKNOWNN
298	OCCUPANT UNKNOWNN
300	DIEDE, KEVIN
302	FERRARI, INEZ A
304	JENNINGS, LEANDER
306	SHEPPARD, NANCY
308	MADIGAN, BILL
	SCHAUF, STACY
310	OCCUPANT UNKNOWNN
314	SELIGSON, STEVEN
316	OCCUPANT UNKNOWNN
318	NEMETH, K L
330	SELTZER, M A
332	BAGGETT, DAN A
334	OCCUPANT UNKNOWNN
336	SMITH, SHIRWIN
400	OCCUPANT UNKNOWNN
402	MULROONEY, JERRY
404	MILLER, BRETT
406	OCCUPANT UNKNOWNN
408	KLUGMAN, JULIAN
410	DAVIS, ARNOLD
412	ROUTH, DOUGLAS C
414	AYALA, E
416	CATERING TO YOUR NEEDS
	OCCUPANT UNKNOWNN
418	WENTZ, JOHN
420	FRIZZELL, CAROL E
422	WHITWELL, GEORGE L

Target Street	Cross Street	Source
✓	-	EDR Digital Archive

DRAKE AVE 1995

703	JACKSON, E A
704	ADAMS, JAMES
705	MCREYNOLDS, LASALLE
707	BEAUCHAMP, LARRY J
709	OCCUPANT UNKNOWNN
710	DUMAS, GEORGE F
711	ALLEN, VINCENT
712	OCCUPANT UNKNOWNN
713	OCCUPANT UNKNOWNN
714	MAGEE, EVELYN
716	MORGAN, B J
717	CAPPA, SABRINA
718	TIMES, JOHN
719	MILLER, DINAH P
721	OCCUPANT UNKNOWNN
722	OCCUPANT UNKNOWNN
723	SHEESHE, MADRE
724	FOSTER, WILBERT
727	TURNER, RONNIE O
728	PINSON, HOWELL
729	DOUGLAS, MELISSA
731	OCCUPANT UNKNOWNN
732	JACKSON, GABE
735	HUTCHETSON, CHRIS D
737	GOWDER, M
740	MARIN CITY COMMUNITY SVC
	MARIN CITY FLEA MARKET
	SCHOOLER LINE
741	GRIFFIN, DAN L
743	PORTER, GLORIA A
745	OCCUPANT UNKNOWNN
747	MORGAN, BARBARA F
825	VILLAGE BAPTIST CHURCH
850	MARIN CITY SHERIFFS DEPT
891	NEWTON, JAMES
893	GASTON, FELECIA
895	DICKENS, CHARLES JR
903	OCCUPANT UNKNOWNN
905	WHITE, DOROTHY L
907	OCCUPANT UNKNOWNN
909	OCCUPANT UNKNOWNN
911	OCCUPANT UNKNOWNN
915	KELLY, ADDIE
917	OCCUPANT UNKNOWNN
921	PEOPLES, MARY K
923	GRIFFIN, MELODY
925	OCCUPANT UNKNOWNN
927	JANAS, EDWARD S
933	JACKSON, DAISY
935	HINES, N

Target Street	Cross Street	Source
✓	-	EDR Digital Archive

DRAKE AVE 1995 (Cont'd)

937	CONDRA, NORA L
939	OCCUPANT UNKNOWNN
941	FREEMAN, E
943	PORTER, GLADYS
949	BURT, CLEAVON
955	STRIPLIN, TANEGA D
959	HUNT, VIOLA
961	WILLIAMS, RUTH
967	ROBERTS, ELIZA M
971	ROBERTS, THOMAS
973	OCCUPANT UNKNOWNN
975	CLARK, GENE
977	OCCUPANT UNKNOWNN
979	JOHNSON, A C
981	OCCUPANT UNKNOWNN
983	AUSTIN, BETTY
989	WILSON, ANNIE L
991	WEBB, E T
995	OCCUPANT UNKNOWNN

Target Street	Cross Street	Source
-	✓	EDR Digital Archive

DONAHUE ST 1992

100	NOVAS BARBEQUE NO 2
147	MARIN CITY FLEA MKT
206	ASANO, DAVID F
208	STREHL, JOHN
228	CROCKET, SAMUEL K
230	DANZ, STEVEN F
234	KIRCOS, LOUIS T
236	COTTER, CYNTHIA
250	GRASSIA, PHILIP G
251	WONG, INEZ L
256	QUADRINI, PHILIP
261	MENZIE, MARK
264	RUDDELL, MICHAEL
268	KNIERIM, SKIP
	WHITE, SEAN D
274	WALTERS, CARL
277	BATES, DEBORAH
282	CROWDER, ROBERT B
288	HINCKLEY, ANGELA
294	LISBONNE, LORNA K
	THOMAS, EDWARD
296	SANDERSON, RUSSELL W
302	FERRARI, INEZ A
306	SHEPPARD, NANCY
316	JOYCE, JAY
330	SELTZER, M A
402	MULROONEY, JERRY
404	NADJI, HESSAM
406	GUSTAFSON, LYN C
412	ROUTH, DOUGLAS C
422	GARAY, MARK M

Target Street	Cross Street	Source
✓	-	EDR Digital Archive

DRAKE AVE 1992

702	DICKENS, CHARLES JR
704	ADAMS, JAMES
705	MCREYNOLDS, LASALLE
707	BEAUCHAMP, LARRY J
712	TALLEY, JAMES
714	MAGEE, EVELYN
718	TIMES, JOHN
731	BLAKEY, GUSSIE
737	GOWDER, M
740	MARIN CTY CMTY SERV
	SCHOOLER LINE
741	GRIFFIN, DAN L
747	MORGAN, BARBARA F
825	VILLAGE BAPTIST CH
891	NEWTON, JAMES
905	WHITE, DOROTHY L
913	PONDEROSA ESTATE
915	KELLY, ADDIE
917	BURNS, DAVID
923	GRIFFIN, MELODY
925	DANSLER, MARDELL
927	JANAS, EDWARD S
933	JACKSON, DAISY
937	CONDRA, NORA L
945	GRINNER, CELIA
949	BURT, CLEAVON
959	HUNT, VIOLA
961	WILLIAMS, RUTH
975	CLARK, GENE
979	JOHNSON, A C
981	WINNERS, K
983	AUSTIN, BETTY
997	COLEMAN, ALICE

Target Street	Cross Street	Source
-	✓	Haines Criss-Cross Directory

DONAHUE ST 1986

DONAHUE 94965
SAUSALITO

147	MARIN CTY FLEA MRKT	332-9709	+6
200	XXXX	00	
202	XXXX	00	
204	XXXX	00	
206	ASANO DAVID F	331-2159	2
212	ANIC M	332-3022	2
220	INSTRUCTIONAL SYST	331-2572	+6
224	HIX LARRY	332-6953	2
	HIX MARSHA	332-6953	
226	GREEN JEFF C	332-7390	3
228	BEAL DON	331-3373	5
230	BARNEY C	331-3470	+8
234	MCCARTHY JOHN T	331-0112	4
236	COTTER CYNTHIA	331-2126	2
236	SHAKIN STEVEN	332-2856	1
250	WILLIAMS RICHARD J	332-4308	
	WILLIAMS RICK	332-4308	4
	WILLIAMS SUSIE	332-4308	
251	XXXX	00	
252	MAXIOR CYNTHIA	332-0488	+6
	WENDT K F	332-9112	1
253	MOLINARI RICHARD	332-4214	3
254	SULLIVAN K	331-8312	+6
255	SMITH ROBT E	331-6403	+6
256	COLEMAN RONALD	331-3734	4
257	WHITELEY GARY	332-6641	1
258	XXXX	00	
260	KNIPS JOS W	331-3231	+8
281	GULISH JOHN	332-4562	3
282	ZANK ELEN	331-6265	+6

Target Street	Cross Street	Source
-	✓	Haines Criss-Cross Directory

DONAHUE ST 1986

..DONAHUE		94965 CONT..	
263	XXXX	00	
264	RUDDELL MICHAEL	332-8832	2
265	XXXX	00	
268	HANSEN TINA	332-7700	3
270	XXXX	00	
271	MOHAN ROBT J	331-5381	+6
272	ARMOR GENE	332-0283	5
273	XXXX	00	
275	GOLDSTEIN SCOTT	331-8223	5
	JOLLUCK DENNIS S	331-8223	5
	MCKENNA LESLIE	331-8223	5
282	XXXX	00	
286	XXXX	00	
288	HINCKLEY A M	332-4037	4
	MCDONALD L	332-4037	4
290	RINGGENBERG JOHN H	331-6178	+6
294	GOOD WALTER L	331-8285	+6
298	XXXX	00	
300	MCCALL DAN	332-7826	3
	MCCALL KATHY	332-7826	
302	FERRARI I A	331-8206	5
304	XXXX	00	
306	HAMPTON LINDA	332-2865	3
308	SCHUSTER T J	331-9187	+6
310	XXXX	00	
312	WESBEY GEORGE E MD	332-7751	3
314	DRESSLAR JOHN H	331-6364	+8
318	NEMETH K L	332-6794	1
330	SELTZER MARGARET A	332-2606	1
332	ALDRIDGE D	332-3070	1
	BAGGETT DAN OD	332-3070	1
334	XXXX	00	
336	VINOCUR BRAD	331-0333	+6
350	XXXX	00	
400	BLODGETT CYNTHIA K	332-3028	5
402	MULROONEY JERRY	332-8862	2
404	XXXX	00	
406	VELTEN MICHAEL K	331-2463	2
408	BOWER GUS	332-4231	+8
410	XXXX	00	
412	MCKENNA JERRY	332-7204	
	MCKENNA VICTORIA	332-7204	5
416	XXXX	00	
420	ADAMS DAVID M	331-9118	+6
	CAPE MICHAEL	331-5187	5
422	GARAY MARK M	331-2117	4
NO #	MARIN CITY YLLW CAB	332-0693	
NO #	YELLOW CAB	332-0690	
★	4 BUS 74 RES	16 NEW	

Target Street	Cross Street	Source
✓	-	Haines Criss-Cross Directory

DRAKE AVE 1986

701	MAYS MARY	332-1825	
702	DICKENS COSTROMA JR	332-4469	
704	ADAMS JAS	332-2538	
705	MCREYNOLDS LASALLE	332-2306	
706	XXXX	00	
707	BEAUCHAMP LARRY J	332-6238	
709	BRACHER ELAINE W	332-3946	
710	XXXX	00	
711	XXXX	00	
712	XXXX	00	
713	JOHNSON MARGUERITA	332-5467	
714	MAGEE E	332-0193	
716	ADAMS JAS E	332-5314	8
717	XXXX	00	
718	TIMES JOHN	332-4951	
724	FOSTER E	332-1485	1
729	KING GEO	332-0437	
730	XXXX	00	
731	BLAKEY GUSSIE	332-3034	
732	GREER HENRY	332-4832	
735	XXXX	00	
737	GOWDER MARGARETTE	332-2214	
739	XXXX	00	
740	MANZANITA CENTER	332-1441	
	MARIN CITY CMTY SV	332-1441	0
	MARIN CITY MULTI SV	332-4412	0
	MARIN CTY FLEA MRKT	332-1441	
741	GRIFFIN DAN L	331-5262	3
	GRIFFIN L D	332-5384	
743	XXXX	00	
745	XXXX	00	
825	VILLAGE BAPTIST CH	332-6156	
835	XXXX	00	
850	MARIN CITY POLICE	332-5422	
	MARIN CO CTY SHRFF	332-5422	
889	XXXX	00	
891	NEWTON JAS	332-0933	
895	SAMUELS T	332-7020	+6
897	XXXX	00	
899	XXXX	00	
901	XXXX	00	
903	XXXX	00	
905	WHITE DOROTHY L	332-5469	
907	THOMAS ROBT JR	331-6383	+8
911	XXXX	00	
913	PGNOEROSA ESTATE	332-8039	0
915	XXXX	00	
917	XXXX	00	
921	XXXX	06	
925	DANSLER M	332-5688	8
927	JANAS EDW S	332-3111	
929	XXXX	00	
933	JACKSON DAISY MRS	332-3247	7
935	XXXX	00	
937	CONDRA NORA LEE	332-2741	
941	XXXX	00	
943	XXXX	00	
945	XXXX	00	
949	BURT SARAH S	332-8523	1
951	XXXX	00	
953	AKOGNON EMMANUEL	332-5725	+8
955	XXXX	00	
957	XXXX	00	
959	HUNT VIOLA	332-1752	
961	WILLIAMS RUTH	332-3935	
963	XXXX	00	
965	XXXX	00	
967	ROBERTS ELIZA M	332-6419	7
969	XXXX	00	
971	XXXX	00	
973	XXXX	00	
975	CLARK GENE	332-4709	5
977	WILLIAMS MARIE	332-2628	
979	JOHNSON A C	332-1981	
	JOHNSON ESTELLA	332-1981	
981	XXXX	00	
983	AUSTIN BETTY	332-3627	+6
987	XXXX	00	
989	XXXX	00	
991	XXXX	00	
993	CURRY PRESTON	332-4573	
995	XXXX	00	
997	COLEMAN ALICE	332-4849	
999	XXXX	00	
NO #	MARIN CITY CH GCO	332-8913	
NO #	MARIN CITY CMTY SV	332-5300	0
NO #	MARIN CTY LIBRARY	332-1128	2
NO #	OGAD SERVICE CENTER	332-1074	
★	29 BUS 169 RES	13 NEW	

Target Street	Cross Street	Source
-	✓	Haines Criss-Cross Directory

DONAHUE ST 1981

DONAHUE 94965
SAUSALITO

200	MINISH B C	332-2854 +1
238	SHAKIN STEVEN	332-2856 +1
250	LIROT A J	332-8275 +1
251	WEATHERS JOE P	332-6041 +1
252	WENDT K F	332-9112 +1
253	CONZELMAN BRUCE	332-8684 +1
255	NICHOLLS D G	332-9505 +1
257	WHITELEY GARY	332-6641 +1
258	MCCOY ANGELA	332-1801 +1
261	HAJEE BILL	332-2792 +1
265	TUNNEY L C	332-7895 +1
268	ADDUCCI CAROLYN	332-2236 +1
	LACAVA LYNN	332-7977 +1
270	DANIEL JACK	332-7721 +1
271	NAVIAS ROBT	332-5649 +1
272	EPIFANIO ROBT	332-1488 +1
	ZAHRADNIK ALAN	332-1488 +1
273	BROWN S N	332-4737 +1
274	JONES KEITH	332-9476 +1
	KUBAT DAVID	332-9476 +1
275	BYRD BEN C	332-1929 +1
	CARTER TERRY R	332-1929 +1
279	BATT NANCY	332-7691 +1

Target Street	Cross Street	Source
✓	-	Haines Criss-Cross Directory

DRAKE AVE 1981

701	MAYS MARY	332-1825	
702	DICKENS COSTROMA JR	332-4469	
704	ADAMS JAS	332-2538	
705	MCREYNOLDS LASALLE	332-2306	6
706	BONNER LA TANYA	332-6469	+1
707	BEAUCHAMP LARRY J	332-6238	6
709	BRACHER ELAINE W	332-3946	
710	BOWIE JULIAN M	332-1427	
711	BARRETT DIANE	332-5176	
712	TALLEY JAS C	332-4557	6
713	JOHNSON MARGUERITA	332-5467	2
714	MAGEE ALLEN	332-0193	
716	ADAMS JAS E	332-5314	8
717	XXXX	00	
718	TIMES JOHN	332-4951	
724	FOSTER E	332-1485	+1
729	KING GEO	332-0437	
730	XXXX	00	
731	BLAKEY GUSSIE	332-3034	4
732	GREER HENRY	332-4832	
735	SMITH DAVID	332-4695	
737	GOWDER MARGARETTE	332-2214	5
739	HOLLINGSWORTH LINDA	332-8381	0
740	**MANZANITA CENTER**	332-1441	0
	MARIN CITY CMTY SV	332-1441	0

Target Street	Cross Street	Source
✓	-	Haines Criss-Cross Directory

DRAKE AVE 1981

..DRAKE AV 94965 CONT..

	MARIN CITY MULTI SV	**332-4412**	0
	MARIN CTY CMNTY DEV	**332-6731**	+1
741	GRIFFIN L D	332-5384	
743	XXXX	00	
745	FULLER TONI	332-6646	4
825	**VILLAGE BAPTIST CH**	**332-5156**	
835	XXXX	00	
850	**CO MRN SHERIFFS DPT**	**332-5422**	8
	MARIN CITY POLICE	**332-5422**	8
889	XXXX	00	
891	NEWTON JAS	332-0933	
895	AKOGNON E	332-5725	+1
897	XXXX	00	
899	HOWARD B	332-7955	0
901	XXXX	00	
903	HABER PAUL	332-4137	0
905	WHITE DOROTHY L	332-5469	
907	XXXX	00	
911	XXXX	00	
913	**OAK KNOLLS OF MARIN**	**332-8825**	+1
	PONDEROSA ESTATE IN	**332-8039**	0
915	STEWART K	332-7398	0
917	XXXX	00	
921	PRICE C	332-5229	6
925	DANSLER M	332-5688	8
	GREEN GINA	332-8658	+1
927	JANAS EDW S	332-3111	
929	BRUMANN IRVIN	332-9179	0
933	JACKSON DAISY MRS	332-3247	7
935	XXXX	00	
937	CONDRA NORA LEE	332-2741	
941	XXXX	00	
943	STRONG ELLA	332-0586	
945	HOWARD C	332-2246	9
949	BURT SARAH S	332-8523	+1
951	EDWARDS I	332-3150	5
953	AUSTIN BETTY	332-3827	0
955	STRIPLIN LULU	332-1386	8
957	HUFF LINDA	332-3889	0
959	HUNT DERRICK	332-7092	9
	HUNT VIOLA	332-1752	2
961	WILLIAMS RUTH	332-3935	4
963	XXXX	00	
965	PIERCE ALICIA R	332-9478	9
967	ROBERTS ELIZA M	332-6419	7
969	LEWIS DOYLE	332-1036	7
971	XXXX	00	
973	XXXX	00	
975	CLARK GENE	332-4709	4
977	WILLIAMS J W	332-2628	
	WILLIAMS MARIE	332-2628	
979	JOHNSON A C	332-1981	
	JOHNSON ESTELLA	332-1981	
981	XXXX	00	
987	XXXX	00	
989	XXXX	00	
991	XXXX	00	
993	CURRY PRESTON	332-4573	2
995	XXXX	00	
997	COLEMAN ALICE	332-4849	
999	XXXX	00	
NO #	**CO MRN LIBRARIES**	**332-1128**	+1
NO #	**MARIN CITY CH GOD**	**332-9913**	
NO #	**MARIN CITY CMTY SV**	**332-5309**	0
NO #	**MARIN HEADSTART**	**332-2337**	0
NO #	**OGAD SERVICE CENTER**	**332-1074**	5
NO #	**STANDREW PRESBY CH**	**332-1011**	7

★ 30 BUS 182 RES 26 NEW

Target Street	Cross Street	Source
-	✓	Haines Criss-Cross Directory

DONAHUE ST 1977

DONAHUE 94965 SAUSALITO

100*MARIN CITY CHVRN SV332-9935 4
*SMICO CHEVRON SERV 332-9935 4
923 XXXX 00
NO #*MARIN CITY YLLW CAB332-0898
NO #*YELLOW CAB OF MARIN332-0898
* 4 BUS 1 RES 0 NEW

Target Street	Cross Street	Source
✓	-	Haines Criss-Cross Directory

DRAKE AVE 1977

701	MAYS MARY	332-1825
702	DICKENS COSTROMA JR	332-4469
704	ADAMS JAS	332-2538
705	MCREYNOLDS LASALLE	332-2306 6
706	BONNER JOELLA	332-5246 5
707	BEAUCHAMP LARRY J	332-6238 6
709	BRACHER ELAINE W	332-3946
710	BOWIE JULIAN M	332-1427
711	BARRETT DIANE	332-5176
712	TALLEY JAS C	332-4557 6
713	JOHNSON MARGUERITA	332-5467 2
714	MAGEE ALLEN	332-0193
716	WILLIAMS MARY L	332-5622 6
717	XXXX	OO
718	TIMES JOHN	332-4951
719	MILLER DINAH P	332-2054+7
723	XXXX	OO
724	FOSTER E	332-1485 6
725	MILLER MERITTA L	332-2560+7
726	XXXX	OO
727	XXXX	OO
729	KING GEO	332-0437
730	XXXX	OO
731	BLAKEY GUSSIE	332-3034 4
732	GREER HENRY	332-4832
735	SMITH DAVID	332-4695
737	GOWDER MARGARETTE	332-2214 5
739	WOODS ACIE	332-1581
	WOODS MARGARET	332-1581
740	XXXX	OO
741	GRIFFIN L D	332-5384
743	XXXX	OO
745	FULLER TONY	332-6646 4
825*	VILLAGE BAPTIST CH	332-5156
835	XXXX	OO
889	XXXX	OO
891	NEWTON JAS	332-0933
895	MCKINNEY JERRY	332-4334+7
897	XXXX	OO
899	WILLIAMS GLA B MRS	332-2432 5
901	BERRY HOWARD E MRS	332-9574 6
903	WILLIAMS RUFUS	332-0883 6
905	WHITE DOROTHY L	332-5469
907	XXXX	OO
911	XXXX	OO
913	THOMAS ANDRETA L	332-2390+7
917	BATTLE GERALD	332-2991+7
921	PRICE C	332-5229 6
923	XXXX	OO
925	DANSLER CHARLIE I	332-5688 6
927	JANAS EDW S	332-3111
929	XXXX	OO
931	XXXX	OO
933	JACKSON DAISY MRS	332-3247+7
935	XXXX	OO
937	CONDRA NORA LEE	332-2741
939	JONES WEBSTER	332-2568
941*	OAK KNOLLS OF MARIN	332-3279+7
943	STRONG ELLA	332-0586
945	XXXX	OO

Target Street	Cross Street	Source
✓	-	Haines Criss-Cross Directory

DRAKE AVE 1977

..DRAKE AV 94965 CONT..

951	EDWARDS I	332-3150 5
955	HARRIS TERRIE G	332-5024 2
957	XXXX	00
959	HUNT VIOLA	332-1752 2
961	WILLIAMS RUTH	332-3935 4
963	XXXX	00
965	COLEMAN JESSIE	332-1354
967	ROBERTS ELIZA M	332-6419+7
969	LEWIS DOYLE	332-1036+7
971	BACON JUANITA	332-9008 6
973	XXXX	00
975	CLARK GENE	332-4709 4
977	WILLIAMS J W	332-2628
	WILLIAMS MARIE	332-2628
979	JOHNSON A C	332-1981
	JOHNSON ESTELLA	332-1981
981	XXXX	00
987	XXXX	00
989	XXXX	00
991	XXXX	00
993	CURRY PRESTON	332-4573 2
995	XXXX	00
997	COLEMAN ALICE	332-4849
999	XXXX	00
NO	#*BEGINNING SCHOOL	332-9141 2
NO	#*MARIN CITY CH GOD	332-9913
NO	#*MARIN CO LIBRARY	332-1128
NO	#*OGAD SERVICE CENTER	332-1074 5
NO	#*ST ANDREW PRESBY CH	332-1011
NO	#*STANDREW UN PRESBY	332-1011+7

* 25 BUS 181 RES 27 NEW

Target Street	Cross Street	Source
-	✓	Haines Criss-Cross Directory

DONAHUE ST 1973

DONAHUE 94965 SAUSALITO
100*MARIN CITY CHVRN SV332-2061
*SMICO CHEVRON SERV 332-2067
923 XXXX CO
NC #*MARIN CITY YLLW CAB332-0898
NO #*YELLOW CAB OF MARIN332-0898
* 4 BUS 1 RES 0 NEW

Target Street	Cross Street	Source
✓	-	Haines Criss-Cross Directory

DRAKE AVE 1973

701	MAYS MARY	332-1825
702	DICKENS COSTROMA JR	332-4469
704	ADAMS JAS	332-2538
706	JACKSON ELIZABETH	332-3632
709	BRACHER ELAINE W	332-3946
710	BOWIE JULIAN M	332-1427
711	BARRETT DIANE	332-5176
712	HILL ROBT L MRS	332-4993
713	JOHNSON MARGUERITA	332-5467+2

Target Street	Cross Street	Source
✓	-	Haines Criss-Cross Directory

DRAKE AVE 1973

..DRAKE AV 94965 CONT..

714	MAGEE ALLEN	332-0193
717	TALLEY JAS C	332-4557
718	TIMES JOHN	332-4951
723	BULLDCK LOIS	332-9538+2
724	BAKER DORIS	332-4189+2
725	ROBERTS LONNIE	332-4293
726	WILLIS LULA MAE	332-5495
	WILLIS ROBT	332-5495
729	KING GEO	332-0437
731	CROSBY BERRY	332-0103
732	GREER HENRY	332-4832
735	SMITH DAVID	332-4695
739	WOODS ACIE	332-1581
	WOODS MARGARET	332-1581
740*	PROJECT BREAKTHRGH	332-1341
741	GRIFFIN L D	332-5384
743	XXXX	00
745	HENSLEY LATANYA	332-3940+2
825*	VILLAGE BAPTIST CH	332-5156
835*	MARIN CITY LRNG CTR	332-5150+2
889	WHITE CHRISTINE	332-6826+2
891	NEWTON JAS	332-0933
897	HUGHES RODNEY	332-1507
899	WILLIAMS CLIVETTA	332-2432+2
901	MAXEY JAS C REV	332-2417+2
905	WHITE DOROTHY L	332-5469
907	XXXX	00
911	WOODS DAVID L	332-6197+2
913	XXXX	00
923	WILLIAMS C J	332-3830+2
927	JANAS EDW S	332-3111
929	GOINES EDGAR MRS	332-2220
935	PAIGE TERRENCE W	332-1642
937	CONDRA NORA LEE	332-2741
939	JONES WEBSTER	332-2568
941	HUNTER BENNIE	332-3279+2
	HUNTER EVELYN MRS	332-3279+2
943	STRONG WM	332-0586
947	PARKS ESTER	332-6657+2
949	XXXX	00
955	HARRIS TERRIE G	332-5024+2
957	JOYNER BARBARA	332-6142+2
959	HUNT VIOLA	332-1752+2
961	CLARK GENE	332-4709
963	SMITH DONALD L	332-3827+2
	SMITH JAS A JR	332-3827+2
965	COLEMAN JESSIE	332-1354
967	XXXX	00
977	WILLIAMS J W	332-2628
	WILLIAMS MARIE	332-2628
979	JOHNSON A C	332-1981
	JOHNSON ESTELLA	332-1981
981	COOK PEARL	332-0875
983*	CATHYS CERAMICS	332-2778
987	HALL JOSEPHINE	332-1893
	HALL MATTHEW	332-1893
989	XXXX	00
991	WEBB ELIZABETH	332-1783
	WEBB JAS	332-1783
993	CURRY PRESTON	332-4573+2
995	THOMAS ROBT	332-1416
997	COLEMAN ALICE	332-4849
999	GAINES C B	332-4884
NO	**BEGINNING SCHOOL	332-9141+2
NO	**MARIN CITY EMPLYMNT	332-9006
NO	**MARIN CTY CH OF GOD	332-9913
NO	**MARIN ECNMC OPRTNTY	332-9006+2
NO	**ST ANDREW PRESBY CH	332-1011

* 28 BUS 155 RES 49 NEW

APPENDIX E

USER QUESTIONNAIRE,
TITLE REPORT AND CLIENT PROVIDED
DOCUMENTATION

PHASE I ESA - USER QUESTIONNAIRE

KCE Matrix, Inc.

Site Address, APN, etc.: 825 Drake Avenue, Sausalito (Marin), CA 94965

In order to qualify for one of the *Landowner Liability Protections (LLPs)* offered by the Small Business Liability Relief and Brownfields Revitalization Act of 2001 (the "*Brownfields Amendments*"), the *user* must provide the following information (if available) to the *environmental professional*. Failure to provide this information could result in a determination that "*all appropriate inquiry*" is not complete.

1. **Environmental cleanup liens that are filed or recorded against the site**
   Are you aware of any environmental cleanup liens against the *property* that are filed or recorded under federal, tribal, state or local law?
   ☒ **No** ☐ **Yes, please explain** _____

2. **Activity and land use limitations that are in place on the site or that have been filed or recorded in a registry**
   Are you aware of any Activity and Use Limitations (AULs), such as *engineering controls*, land use restrictions or *institutional controls* that are in place at the site and/or have been filed or recorded in a registry under federal, tribal, state or local law?
   ☒ **No** ☐ **Yes, please explain** _____

3. **Specialized knowledge or experience of the person seeking to qualify for the LLP**
   As the *user* of this *ESA,* do you have any specialized knowledge or experience related to the *property* or nearby properties? For example, are you involved in the same line of business as the current or former *occupants* of the *property* or an adjoining *property* so that you would have specialized knowledge of the chemicals and processes used by this type of business?
   ☒ **No** ☐ **Yes, please explain** _____

4. **Relationship of the purchase price to the fair market value of the *property* if it were not contaminated**
   Does the purchase price being paid for this *property* reasonably reflect the fair market value of the *property*?
   ☒ **Yes** ☐ **No, there is a difference between the purchase price and the fair market value**
   If you conclude that there is a difference, have you considered whether the lower purchase price is because contamination is known or believed to be present at the *property*?
   please explain _____

5. **Commonly known or *reasonably ascertainable* information about the *property***
   Are you aware of commonly known or *reasonably ascertainable* information about the *property* that would help the *environmental professional* to identify conditions indicative of releases or threatened releases? For example, as *user*,

   (a.) Do you know the past uses of the *property*?
   ☐ **No** ☒ **Yes, please explain** Church

   (b.) Do you know of specific chemicals that are present or once were present at the *property*?
   ☒ **No** ☐ **Yes, please explain** _____

   (c.) Do you know of spills or other chemical releases that have taken place at the *property*?
   ☒ **No** ☐ **Yes, please explain** _____

   (d.) Do you know of any environmental cleanups that have taken place at the *property*?
   ☒ **No** ☐ **Yes, please explain** _____

6. **The degree of obviousness of the presence of likely presence of contamination at the *property*, and the ability to detect the contamination by appropriate investigation**
   As the *user* of this *ESA*, based on your knowledge and experience related to the *property,* are there any *obvious* indicators that point to the presence or likely presence of contamination at the *property*?
   ☒ **No** ☐ **Yes, please explain** _____

Note: Landowner Liability Protections, or *LLPs*, is the term used to describe the three types of potential defenses to Superfund liability in EPA's *Interim Guidance Regarding Criteria Landowners Must Meet in Order to Qualify for Bona Fide Prospective Purchaser, Contiguous Property Owner, or Innocent Landowner Limitations on CERCLA Liability* ("*Common Elements*" Guide) issued on March 6, 2003.

PHASE I ESA - USER QUESTIONNAIRE

KCE Matrix, Inc.

In addition, certain information should be collected, if available, and provided to *KCE Matrix, Inc.* to conduct the Phase I Environmental Site Assessment. This information is intended to assist *KCE Matrix, Inc.* but is not necessarily required to qualify for one of the *LLPs*. The information includes:

(a) The reason why the Phase I Environmental Site Assessment is required,

The reason for the request is for closing.

(b) The type of *property* and type of *property* transaction, for example, sale, purchase, exchange, etc.,

Purchase

(c) The complete and correct address for the *property* (a map or other documentation showing *property* location and boundaries is helpful)

825 Drake Ave, Sausalito, CA 94965

(d) The scope of services desired for the Phase I (including whether any parties to the *property* transaction may have a required standard scope of services on whether any considerations beyond the requirements of Practice E 1527 are to be considered),

Standard Phase 1 ESA scope

(e) Identification of all parties who will rely on the Phase I *report*,

Pacific West Communities; AMG

(f) Identification of the site contact and how the contact can be reached,

Kimberly Calica 818-380-2600

(g) Any special terms and conditions which must be agreed upon by the *environmental professional*

No

(h) Any other knowledge or experience with the *property* that may be pertinent to the *environmental professional* for example, copies of any available prior *environmental site assessment reports*, documents, correspondence, etc., concerning the *property* and its environmental condition).

No

PHASE I ESA - USER QUESTIONNAIRE

KCE Matrix, Inc.

Vapor Encroachment Screening Section

1. **Property Type:**
☐ Commercial ☐ Industrial ☐ Multi Tenant ☒ Vacant Land

2. **Are there any building/structures on the property?**
☐ No ☐ Unknown ☒ Yes, type construction Manufactured Home

3. **Will buildings/structures be constructed on the property in the future?**
☐ No ☐ Unknown ☒ Yes, type construction _____

4. **If buildings exist or are proposed, do/will they have elevators?**
☒ Yes ☐ No

5. **Type of level below grade (existing or proposed)?**
☐ Full Basement ☐ Crawl Space ☒ Slab on Grade ☐ Parking Garage ☐ Multi-Level

6. **Ventilation in level below grade?**
☐ Yes ☒ No ☐ Unknown

7. **Sump pumps, floor drains, or trenches (existing or proposed)?**
☐ Yes ☐ No ☒ Unknown

8. **Radon or methane mitigation system installed?**
☐ Yes ☐ No ☒ Unknown

9. **Heating system type? (existing or proposed)? (CHECK ALL THAT APPLY)**

☒ Hot Air Circulation	☐ Electric Baseboard	☐ Hot Air Radiation	☐ Heat Pump
☐ Hot Water Radiation	☐ Wood Stove	☐ Kerosene Heater	☐ Steam Radiation
☐ Fireplace	☐ Coal Furnace	☐ Radiant Floor Heat	☐ Hot Water Circulation
☐ Fuel Oil Furnace	☐ Gas Furnace	☐ Other	

10. **Type of fuel energy? (existing or proposed)? (CHECK ALL THAT APPLY)**

☒ Natural Gas	☒ Electric	☐ Propane	☐ Fuel Oil
☐ Kerosene	☐ Wood	☐ Coal	☐ Solar
☐ Other			

11. **Have there ever been any environmental problems at the property?**
☐ No ☒ Unknown ☐ Yes, describe _____

12. **Does/will a gas station or dry cleaner operate anywhere on the property?**
☐ Yes ☒ No ☐ Unknown

13. **Do any tenants use hazardous chemicals in relatively large quantities on the property?**
☒ No ☐ Unknown ☐ Yes, describe _____

PHASE I ESA - USER QUESTIONNAIRE

KCE Matrix, Inc.

Vapor Encroachment Screening Section Continued:

14. **Have any tenants ever complained about odors in the building or experienced health related problems that may have been associated with the building?**
    ☐ Yes ☐ No ■ Unknown

15. **Are the operations (or proposed operations to be performed) on the property OSHA regulated?**
    ☐ Yes ☐ No ■ Unknown

16. **Are there any existing or proposed underground storage tanks (USTs) or above ground storage tanks (ASTs)?**
    ☐ Yes ☐ No ■ Unknown

17. **Are there any sensitive receptors (for example, children, elderly, people in poor health, and so forth) that occupy or will occupy the property?**
    ☐ Yes ☐ No ■ Unknown

Print Name: Niki Slattery **Date:** 1/12/2023

Updated

First American Title

First American Title Company

211 East Caldwell Avenue
Visalia, CA 93277

Order Number:	5405-6478866 (AK)
Escrow Officer:	Ann Kay
Phone:	(559)635-6803
Fax No.:	(866)590-2167
E-Mail:	akay@firstam.com
Title Officer:	Ann Kay
Phone:	(559)635-6803
Fax No.:	(866)590-2167
E-Mail:	akay@firstam.com
E-Mail Loan Documents to:	VisaliaEDocs@firstam.com
Buyer:	TBD
Owner:	Affordable Housing Land Consultants, LLC
Property:	825 Drake Ave Sausalito, CA 94965

PRELIMINARY REPORT

In response to the above referenced application for a policy of title insurance, this company hereby reports that it is prepared to issue, or cause to be issued, as of the date hereof, a Policy or Policies of Title Insurance describing the land and the estate or interest therein hereinafter set forth, insuring against loss which may be sustained by reason of any defect, lien or encumbrance not shown or referred to as an Exception below or not excluded from coverage pursuant to the printed Schedules, Conditions and Stipulations of said Policy forms.

The printed Exceptions and Exclusions from the coverage and Limitations on Covered Risks of said policy or policies are set forth in Exhibit A attached. *The policy to be issued may contain an arbitration clause. When the Amount of Insurance is less than that set forth in the arbitration clause, all arbitrable matters shall be arbitrated at the option of either the Company or the Insured as the exclusive remedy of the parties.* Limitations on Covered Risks applicable to the CLTA and ALTA Homeowner's Policies of Title Insurance which establish a Deductible Amount and a Maximum Dollar Limit of Liability for certain coverages are also set forth in Exhibit A. Copies of the policy forms should be read. They are available from the office which issued this report.

Please read the exceptions shown or referred to below and the exceptions and exclusions set forth in Exhibit A of this report carefully. The exceptions and exclusions are meant to provide you with notice of matters which are not covered under the terms of the title insurance policy and should be carefully considered.

It is important to note that this preliminary report is not a written representation as to the condition of title and may not list all liens, defects, and encumbrances affecting title to the land.

This report (and any supplements or amendments hereto) is issued solely for the purpose of facilitating the issuance of a policy of title insurance and no liability is assumed hereby. If it is desired that liability be assumed prior to the issuance of a policy of title insurance, a Binder or Commitment should be requested.

Dated as of September 09, 2022 at 7:30 A.M.

The form of Policy of title insurance contemplated by this report is:

To Be Determined

A specific request should be made if another form or additional coverage is desired.

Title to said estate or interest at the date hereof is vested in:

AFFORDABLE HOUSING LAND CONSULTANTS, LLC, A CALIFORNIA LIMITED LIABILITY COMPANY

The estate or interest in the land hereinafter described or referred to covered by this Report is:

FEE

The Land referred to herein is described as follows:

(See attached Legal Description)

At the date hereof exceptions to coverage in addition to the printed Exceptions and Exclusions in said policy form would be as follows:

1. General and special taxes and assessments for the fiscal year 2022-2023, a lien not yet due or payable.

2. Intentionally Deleted

3. The Land lies within the boundaries of proposed community facilities District No. 2014-1 (CLEAN ENERGY), as disclosed by a map filed August 28, 2015 in BOOK 2015, PAGE 124 of maps of assessment and community facilities districts.

4. The lien of supplemental taxes, if any, assessed pursuant to Chapter 3.5 commencing with Section 75 of the California Revenue and Taxation Code.

5. "Covenants, conditions and restrictions in the document recorded March 10, 1961 as INSTRUMENT NO. 1961-6690 IN BOOK 1443, PAGE 130 of Official Records, but deleting any covenant, condition, or restriction, if any, indicating a preference, limitation, or discrimination based on race, color, religion, sex, gender, gender identity, gender expression, sexual orientation, familial status, marital status, disability, handicap, veteran or military status, genetic information, national origin, source of income as defined in subdivision (p) of Section 12955, or ancestry, to the extent that such covenants, conditions or restrictions violate applicable state or federal laws. Lawful restrictions under state and federal law on the age of occupants in senior housing or housing for older persons shall not be construed as restrictions based on familial status."

6. The terms and provisions contained in the document entitled "RESOLUTION NO. 53" recorded March 10, 1961 as INSTRUMENT NO. 1961-6691 IN BOOK 1443, PAGE 155 of Official Records.

7. The terms and provisions contained in the document entitled "LAND DISPOSITION AGREEMENT" recorded November 27, 1964 as INSTRUMENT NO. 1964-49393 IN BOOK 1887, PAGE 47 OF OFFICIAL RECORDS.

8. A document entitled "DEED" recorded July 06, 1965 as INSTRUMENT NO. 1965-24346 IN BOOK 1957, PAGE 492 of Official Records.

9. A document entitled "CORPORATION GRANT DEED" recorded December 05, 1983 as INSTRUMENT NO. 1983-060698 of Official Records.

10. An easement shown or dedicated on the Map as referred to in the legal description

    For: STORM DRAIN AND SANITARY SEWER EASEMENT and incidental purposes.

11. An easement for STORM DRAIN AND SEWER PURPOSE and incidental purposes, recorded April 16, 1986 as INSTRUMENT NO. 1986-019406 of Official Records.
    In Favor of: VILLAGE BAPTIST CHURCH OF MARIN CITY
    Affects: AS DESCRIBED THEREIN

12. An easement for ANCHORS, GUY WIRES AND CABLES, GUY STUBS, AND FIXTURES AS SECOND PARTY DEEMS NECESSARY and incidental purposes, recorded April 08, 1999 as INSTRUMENT NO. 1999-0027844 of Official Records.
    In Favor of: PACIFIC GAS AND ELECTRIC COMPANY, A CALIFORNIA CORPORATION
    Affects: A SOUTHERLY PORTION

13. A deed of trust to secure an original indebtedness of $2,250,000.00 recorded February 26, 2020 as INSTRUMENT NO. 2020-0007494 OF OFFICIAL RECORDS.

Dated:	February 20, 2020
Trustor:	AFFORDABLE HOUSING LAND CONSULTANTS, LLC, A CALIFORNIA LIMITED LIABILITY COMPANY
Trustee:	CENTURY AFFORDABLE DEVELOPMENT, INC., A CALIFORNIA CORPORATION
Beneficiary:	CENTURY HOUSING CORPORATION, A CALIFORNIA NONPROFIT CORPORATION

a. If this deed of trust is to be eliminated in the policy or policies contemplated by this report/commitment, the company will require the following for review prior to the recordation of any documents or the issuance of any policy of title insurance:
    i. Original note and deed of trust.
    ii. Payoff demand statement signed by all present beneficiaries.
    iii. Request for reconveyance or substitution of trustee and full reconveyance must be signed by all present beneficiaries and must be notarized by a First American approved notary.

b. If the payoff demand statement or the request for reconveyance is to be signed by a servicer, we will also require a full copy of the loan servicing agreement executed by all present beneficiaries.

c. If any of the beneficial interest is presently held by trustees under a trust agreement, we will require a certification pursuant to Section 18100.5 of the California Probate Code in a form satisfactory to the Company.

14. The new lender, if any, for this transaction may be a Non-Institutional Lender. If so, the Company will require the Deed of Trust to be signed before a First American approved notary.

15. Rights of parties in possession.

Prior to the issuance of any policy of title insurance, the Company will require:

16. With respect to AFFORDABLE HOUSING LAND CONSULTANTS, LLC, a California limited liability company:
a. A copy of its operating agreement and any amendments thereto;
b. If it is a California limited liability company, that a certified copy of its articles of organization (LLC-1) and any certificate of correction (LLC-11), certificate of amendment (LLC-2), or restatement of articles of organization (LLC-10) be recorded in the public records;
c. If it is a foreign limited liability company, that a certified copy of its application for registration (LLC-5) be recorded in the public records;
d. With respect to any deed, deed of trust, lease, subordination agreement or other document or instrument executed by such limited liability company and presented for recordation by the Company or upon which the Company is asked to rely, that such document or instrument be executed in accordance with one of the following, as appropriate:
(i) If the limited liability company properly operates through officers appointed or elected pursuant to the terms of a written operating agreement, such document must be executed by at least two duly elected or appointed officers, as follows: the chairman of the board, the president or any vice president, and any secretary, assistant secretary, the chief financial officer or any assistant treasurer;
(ii) If the limited liability company properly operates through a manager or managers identified in the articles of organization and/or duly elected pursuant to the terms of a written operating agreement, such document must be executed by at least two such managers or by one manager if the limited liability company properly operates with the existence of only one manager.
e. Other requirements which the Company may impose following its review of the material required herein and other information which the Company may require

INFORMATIONAL NOTES

Note: The policy to be issued may contain an arbitration clause. When the Amount of Insurance is less than the certain dollar amount set forth in any applicable arbitration clause, all arbitrable matters shall be arbitrated at the option of either the Company or the Insured as the exclusive remedy of the parties. If you desire to review the terms of the policy, including any arbitration clause that may be included, contact the office that issued this Commitment or Report to obtain a sample of the policy jacket for the policy that is to be issued in connection with your transaction.

1. General and special taxes and assessments for the fiscal year 2021-2022.

First Installment:	$15,135.55, PAID
Penalty:	$0.00
Second Installment:	$15,135.55, PAID
Penalty:	$0.00
Tax Rate Area:	090-031
A. P. No.:	052-112-03

2. According to the latest available equalized assessment roll in the office of the county tax assessor, there is located on the land a(n) COMMERCIAL STRUCTURE known as 825 Drake Avenue, Sausalito, California.

3. According to the public records, there has been no conveyance of the land within a period of twenty-four months prior to the date of this report, except as follows:

   None

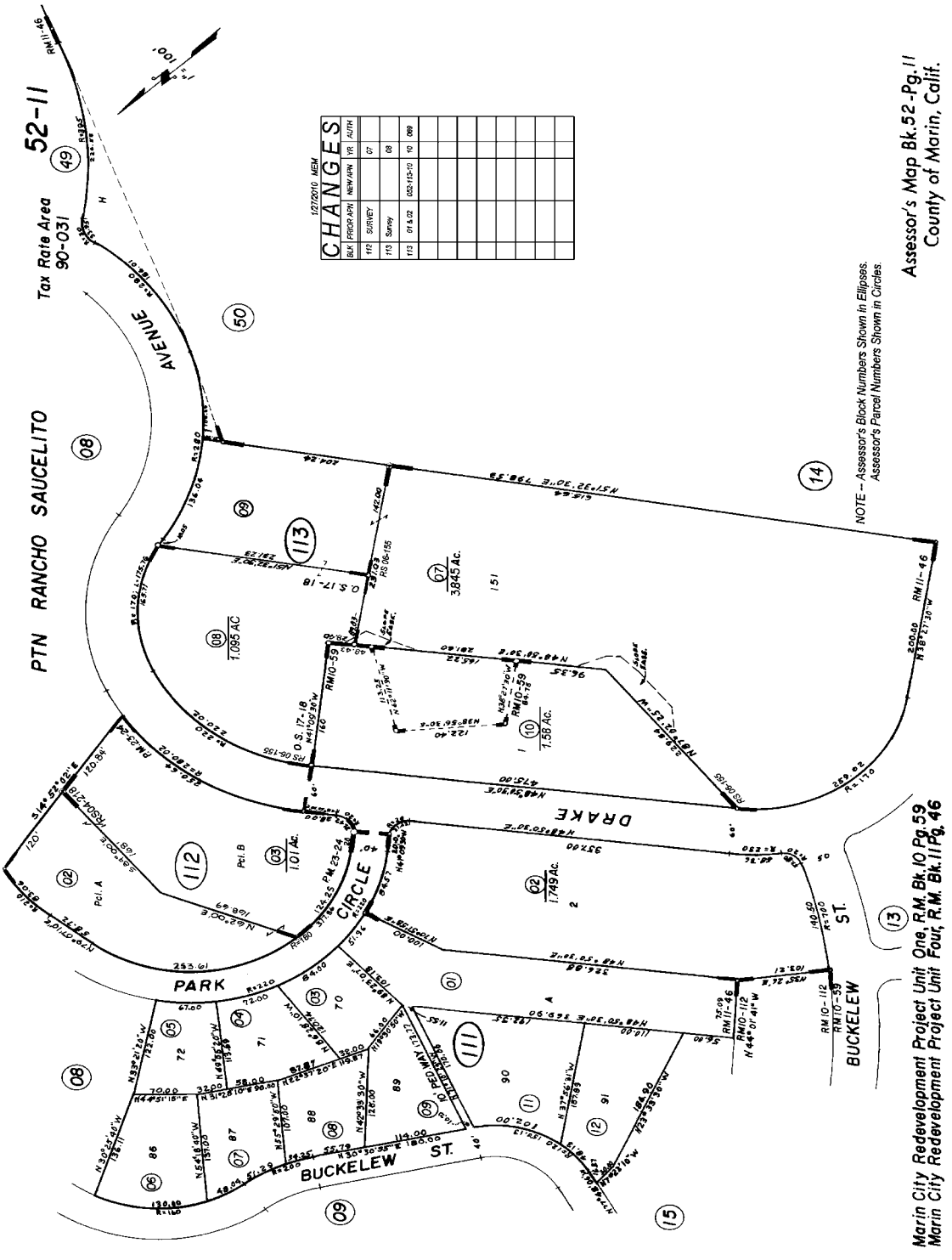
The map attached, if any, may or may not be a survey of the land depicted hereon. First American expressly disclaims any liability for loss or damage which may result from reliance on this map except to the extent coverage for such loss or damage is expressly provided by the terms and provisions of the title insurance policy, if any, to which this map is attached.

LEGAL DESCRIPTION

Real property in the unincorporated area of the County of Marin, State of California, described as follows:

PARCEL B, AS SHOWN UPON THAT CERTAIN PARCEL MAP ENTITLED "PARCEL MAP LANDS OF VILLAGE BAPTIST CHURCH OF MARIN CITY", FILED FOR RECORD MARCH 17, 1986 IN BOOK 23 OF PARCEL MAPS, AT PAGE 24, MARIN COUNTY RECORDS.

APN: 052-112-03


Assessor's Map Bk.52-Pg.11
County of Marin, Calif.
NOTE – Assessor's Block Numbers Shown in Ellipses.
Assessor's Parcel Numbers Shown in Circles.
Tax Rate Area 90-031
52-11
PTN RANCHO SAUCELITO
AVENUE
DRAKE
CIRCLE
PARK
BUCKELEW ST.
CHANGES
1/27/2010 MEW
Marin City Redevelopment Project Unit One, R.M. Bk.10 Pg.59
Marin City Redevelopment Project Unit Four, R.M. Bk.11 Pg.46
THIS MAP WAS PREPARED FOR ASSESSMENT PURPOSES ONLY. NO LIABILITY IS ASSUMED FOR THE ACCURACY OF THE DATA SHOWN. ASSESSOR'S PARCELS MAY NOT COMPLY WITH LOCAL SUBDIVISION OR BUILDING ORDINANCES.

NOTICE

Section 12413.1 of the California Insurance Code, effective January 1, 1990, requires that any title insurance company, underwritten title company, or controlled escrow company handling funds in an escrow or sub-escrow capacity, wait a specified number of days after depositing funds, before recording any documents in connection with the transaction or disbursing funds. This statute allows for funds deposited by wire transfer to be disbursed the same day as deposit. In the case of cashier's checks or certified checks, funds may be disbursed the next day after deposit. In order to avoid unnecessary delays of three to seven days, or more, please use wire transfer, cashier's checks, or certified checks whenever possible.

EXHIBIT A
LIST OF PRINTED EXCEPTIONS AND EXCLUSIONS (BY POLICY TYPE)

CLTA STANDARD COVERAGE POLICY – 1990

EXCLUSIONS FROM COVERAGE

The following matters are expressly excluded from the coverage of this policy and the Company will not pay loss or damage, costs, attorneys' fees or expenses which arise by reason of:

1. (a) Any law, ordinance or governmental regulation (including but not limited to building or zoning laws, ordinances, or regulations) restricting, regulating, prohibiting or relating (i) the occupancy, use, or enjoyment of the land; (ii) the character, dimensions or location of any improvement now or hereafter erected on the land; (iii) a separation in ownership or a change in the dimensions or area of the land or any parcel of which the land is or was a part; or (iv) environmental protection, or the effect of any violation of these laws, ordinances or governmental regulations, except to the extent that a notice of the enforcement thereof or a notice of a defect, lien, or encumbrance resulting from a violation or alleged violation affecting the land has been recorded in the public records at Date of Policy.
   (b) Any governmental police power not excluded by (a) above, except to the extent that a notice of the exercise thereof or notice of a defect, lien or encumbrance resulting from a violation or alleged violation affecting the land has been recorded in the public records at Date of Policy.
2. Rights of eminent domain unless notice of the exercise thereof has been recorded in the public records at Date of Policy, but not excluding from coverage any taking which has occurred prior to Date of Policy which would be binding on the rights of a purchaser for value without knowledge.
3. Defects, liens, encumbrances, adverse claims or other matters:
   (a) whether or not recorded in the public records at Date of Policy, but created, suffered, assumed or agreed to by the insured claimant;
   (b) not known to the Company, not recorded in the public records at Date of Policy, but known to the insured claimant and not disclosed in writing to the Company by the insured claimant prior to the date the insured claimant became an insured under this policy;
   (c) resulting in no loss or damage to the insured claimant;
   (d) attaching or created subsequent to Date of Policy; or
   (e) resulting in loss or damage which would not have been sustained if the insured claimant had paid value for the insured mortgage or for the estate or interest insured by this policy.
4. Unenforceability of the lien of the insured mortgage because of the inability or failure of the insured at Date of Policy, or the inability or failure of any subsequent owner of the indebtedness, to comply with the applicable doing business laws of the state in which the land is situated.
5. Invalidity or unenforceability of the lien of the insured mortgage, or claim thereof, which arises out of the transaction evidenced by the insured mortgage and is based upon usury or any consumer credit protection or truth in lending law.
6. Any claim, which arises out of the transaction vesting in the insured the estate of interest insured by this policy or the transaction creating the interest of the insured lender, by reason of the operation of federal bankruptcy, state insolvency or similar creditors' rights laws.

EXCEPTIONS FROM COVERAGE - SCHEDULE B, PART I

This policy does not insure against loss or damage (and the Company will not pay costs, attorneys' fees or expenses) which arise by reason of:

1. Taxes or assessments which are not shown as existing liens by the records of any taxing authority that levies taxes or assessments on real property or by the public records.
   Proceedings by a public agency which may result in taxes or assessments, or notices of such proceedings, whether or not shown by the records of such agency or by the public, records.
2. Any facts, rights, interests, or claims which are not shown by the public records but which could be ascertained by an inspection of the land or which may be asserted by persons in possession thereof.
3. Easements, liens or encumbrances, or claims thereof, not shown by the public records.
4. Discrepancies, conflicts in boundary lines, shortage in area, encroachments, or any other facts which a correct survey would disclose, and which are not shown by the public records.
5. (a) Unpatented mining claims; (b) reservations or exceptions in patents or in Acts authorizing the issuance thereof; (c) water rights, claims or title to water, whether or not the matters excepted under (a), (b) or (c) are shown by the public records.
6. Any lien or right to a lien for services, labor or material unless such lien is shown by the public records at Date of Policy.

CLTA/ALTA HOMEOWNER'S POLICY OF TITLE INSURANCE (12-02-13)

EXCLUSIONS

In addition to the Exceptions in Schedule B, You are not insured against loss, costs, attorneys' fees, and expenses resulting from:

1. Governmental police power, and the existence or violation of those portions of any law or government regulation concerning:
   a. building;
   b. zoning;
   c. land use;

d. improvements on the Land;
e. land division; and
f. environmental protection.
This Exclusion does not limit the coverage described in Covered Risk 8.a., 14, 15, 16, 18, 19, 20, 23 or 27.

2. The failure of Your existing structures, or any part of them, to be constructed in accordance with applicable building codes. This Exclusion does not limit the coverage described in Covered Risk 14 or 15.
3. The right to take the Land by condemning it. This Exclusion does not limit the coverage described in Covered Risk 17.
4. Risks:
   a. that are created, allowed, or agreed to by You, whether or not they are recorded in the Public Records;
   b. that are Known to You at the Policy Date, but not to Us, unless they are recorded in the Public Records at the Policy Date;
   c. that result in no loss to You; or
   d. that first occur after the Policy Date - this does not limit the coverage described in Covered Risk 7, 8.e., 25, 26, 27 or 28.
5. Failure to pay value for Your Title.
6. Lack of a right:
   a. to any land outside the area specifically described and referred to in paragraph 3 of Schedule A; and
   b. in streets, alleys, or waterways that touch the Land.
   This Exclusion does not limit the coverage described in Covered Risk 11 or 21.
7. The transfer of the Title to You is invalid as a preferential transfer or as a fraudulent transfer or conveyance under federal bankruptcy, state insolvency, or similar creditors' rights laws.
8. Contamination, explosion, fire, flooding, vibration, fracturing, earthquake, or subsidence.
9. Negligence by a person or an Entity exercising a right to extract or develop minerals, water, or any other substances.

LIMITATIONS ON COVERED RISKS

Your insurance for the following Covered Risks is limited on the Owner's Coverage Statement as follows:
For Covered Risk 16, 18, 19, and 21 Your Deductible Amount and Our Maximum Dollar Limit of Liability shown in Schedule A.
The deductible amounts and maximum dollar limits shown on Schedule A are as follows:

	Your Deductible Amount	Our Maximum Dollar Limit of Liability
Covered Risk 16:	1% of Policy Amount Shown in Schedule A or $2,500 (whichever is less)	$10,000
Covered Risk 18:	1% of Policy Amount Shown in Schedule A or $5,000 (whichever is less)	$25,000
Covered Risk 19:	1% of Policy Amount Shown in Schedule A or $5,000 (whichever is less)	$25,000
Covered Risk 21:	1% of Policy Amount Shown in Schedule A or $2,500 (whichever is less)	$5,000

2006 ALTA LOAN POLICY (06-17-06)
EXCLUSIONS FROM COVERAGE

The following matters are expressly excluded from the coverage of this policy, and the Company will not pay loss or damage, costs, attorneys' fees, or expenses that arise by reason of:

1. (a) Any law, ordinance, permit, or governmental regulation (including those relating to building and zoning) restricting, regulating, prohibiting, or relating to

   (i) the occupancy, use, or enjoyment of the Land;
   (ii) the character, dimensions, or location of any improvement erected on the Land;
   (iii) the subdivision of land; or
   (iv) environmental protection;

   or the effect of any violation of these laws, ordinances, or governmental regulations. This Exclusion 1(a) does not modify or limit the coverage provided under Covered Risk 5.
   (b) Any governmental police power. This Exclusion 1(b) does not modify or limit the coverage provided under Covered Risk 6.
2. Rights of eminent domain. This Exclusion does not modify or limit the coverage provided under Covered Risk 7 or 8.
3. Defects, liens, encumbrances, adverse claims, or other matters
   (a) created, suffered, assumed, or agreed to by the Insured Claimant;
   (b) not Known to the Company, not recorded in the Public Records at Date of Policy, but Known to the Insured Claimant and not disclosed in writing to the Company by the Insured Claimant prior to the date the Insured Claimant became an Insured under this policy;

(c) resulting in no loss or damage to the Insured Claimant;
(d) attaching or created subsequent to Date of Policy (however, this does not modify or limit the coverage provided under Covered Risk 11, 13, or 14); or
(e) resulting in loss or damage that would not have been sustained if the Insured Claimant had paid value for the Insured Mortgage.

4. Unenforceability of the lien of the Insured Mortgage because of the inability or failure of an Insured to comply with applicable doing-business laws of the state where the Land is situated.
5. Invalidity or unenforceability in whole or in part of the lien of the Insured Mortgage that arises out of the transaction evidenced by the Insured Mortgage and is based upon usury or any consumer credit protection or truth-in-lending law.
6. Any claim, by reason of the operation of federal bankruptcy, state insolvency, or similar creditors' rights laws, that the transaction creating the lien of the Insured Mortgage, is
(a) a fraudulent conveyance or fraudulent transfer, or
(b) a preferential transfer for any reason not stated in Covered Risk 13(b) of this policy.
7. Any lien on the Title for real estate taxes or assessments imposed by governmental authority and created or attaching between Date of Policy and the date of recording of the Insured Mortgage in the Public Records. This Exclusion does not modify or limit the coverage provided under Covered Risk 11(b).

The above policy form may be issued to afford either Standard Coverage or Extended Coverage. In addition to the above Exclusions from Coverage, the Exceptions from Coverage in a Standard Coverage policy will also include the following Exceptions from Coverage:

EXCEPTIONS FROM COVERAGE

[Except as provided in Schedule B - Part II,[t[or T]his policy does not insure against loss or damage, and the Company will not pay costs, attorneys' fees or expenses, that arise by reason of:

[PART I

[The above policy form may be issued to afford either Standard Coverage or Extended Coverage. In addition to the above Exclusions from Coverage, the Exceptions from Coverage in a Standard Coverage policy will also include the following Exceptions from Coverage:

1. (a) Taxes or assessments that are not shown as existing liens by the records of any taxing authority that levies taxes or assessments on real property or by the Public Records; (b) proceedings by a public agency that may result in taxes or assessments, or notices of such proceedings, whether or not shown by the records of such agency or by the Public Records.
2. Any facts, rights, interests, or claims that are not shown by the Public Records but that could be ascertained by an inspection of the Land or that may be asserted by persons in possession of the Land.
3. Easements, liens or encumbrances, or claims thereof, not shown by the Public Records.
4. Any encroachment, encumbrance, violation, variation, or adverse circumstance affecting the Title that would be disclosed by an accurate and complete land survey of the Land and not shown by the Public Records.
5. (a) Unpatented mining claims; (b) reservations or exceptions in patents or in Acts authorizing the issuance thereof; (c) water rights, claims or title to water, whether or not the matters excepted under (a), (b), or (c) are shown by the Public Records.
6. Any lien or right to a lien for services, labor or material unless such lien is shown by the Public Records at Date of Policy.

PART II

In addition to the matters set forth in Part I of this Schedule, the Title is subject to the following matters, and the Company insures against loss or damage sustained in the event that they are not subordinate to the lien of the Insured Mortgage:]

2006 ALTA OWNER'S POLICY (06-17-06)
EXCLUSIONS FROM COVERAGE

The following matters are expressly excluded from the coverage of this policy, and the Company will not pay loss or damage, costs, attorneys' fees, or expenses that arise by reason of:

1. (a) Any law, ordinance, permit, or governmental regulation (including those relating to building and zoning) restricting, regulating, prohibiting, or relating to

(i) the occupancy, use, or enjoyment of the Land;
(ii) the character, dimensions, or location of any improvement erected on the Land;
(iii) the subdivision of land; or
(iv) environmental protection;

or the effect of any violation of these laws, ordinances, or governmental regulations. This Exclusion 1(a) does not modify or limit the coverage provided under Covered Risk 5.
(b) Any governmental police power. This Exclusion 1(b) does not modify or limit the coverage provided under Covered Risk 6.
2. Rights of eminent domain. This Exclusion does not modify or limit the coverage provided under Covered Risk 7 or 8.
3. Defects, liens, encumbrances, adverse claims, or other matters
(a) created, suffered, assumed, or agreed to by the Insured Claimant;
(b) not Known to the Company, not recorded in the Public Records at Date of Policy, but Known to the Insured Claimant and not disclosed in writing to the Company by the Insured Claimant prior to the date the Insured Claimant became an Insured under this policy;

(c) resulting in no loss or damage to the Insured Claimant;
(d) attaching or created subsequent to Date of Policy (however, this does not modify or limit the coverage provided under Covered Risk 9 or 10); or
(e) resulting in loss or damage that would not have been sustained if the Insured Claimant had paid value for the Title.

4. Any claim, by reason of the operation of federal bankruptcy, state insolvency, or similar creditors' rights laws, that the transaction vesting the Title as shown in Schedule A, is
(a) a fraudulent conveyance or fraudulent transfer, or
(b) a preferential transfer for any reason not stated in Covered Risk 9 of this policy.
5. Any lien on the Title for real estate taxes or assessments imposed by governmental authority and created or attaching between Date of Policy and the date of recording of the deed or other instrument of transfer in the Public Records that vests Title as shown in Schedule A.

The above policy form may be issued to afford either Standard Coverage or Extended Coverage. In addition to the above Exclusions from Coverage, the Exceptions from Coverage in a Standard Coverage policy will also include the following Exceptions from Coverage:

EXCEPTIONS FROM COVERAGE

This policy does not insure against loss or damage, and the Company will not pay costs, attorneys' fees or expenses, that arise by reason of:
[The above policy form may be issued to afford either Standard Coverage or Extended Coverage. In addition to the above Exclusions from Coverage, the Exceptions from Coverage in a Standard Coverage policy will also include the following Exceptions from Coverage:

1. (a) Taxes or assessments that are not shown as existing liens by the records of any taxing authority that levies taxes or assessments on real property or by the Public Records; (b) proceedings by a public agency that may result in taxes or assessments, or notices of such proceedings, whether or not shown by the records of such agency or by the Public Records.
2. Any facts, rights, interests, or claims that are not shown by the Public Records but that could be ascertained by an inspection of the Land or that may be asserted by persons in possession of the Land.
3. Easements, liens or encumbrances, or claims thereof, not shown by the Public Records.
4. Any encroachment, encumbrance, violation, variation, or adverse circumstance affecting the Title that would be disclosed by an accurate and complete land survey of the Land and not shown by the Public Records.
5. (a) Unpatented mining claims; (b) reservations or exceptions in patents or in Acts authorizing the issuance thereof; (c) water rights, claims or title to water, whether or not the matters excepted under (a), (b), or (c) are shown by the Public Records.
6. Any lien or right to a lien for services, labor or material unless such lien is shown by the Public Records at Date of Policy.
7. [Variable exceptions such as taxes, easements, CC&R's, etc. shown here.]

ALTA EXPANDED COVERAGE RESIDENTIAL LOAN POLICY (07-26-10)
EXCLUSIONS FROM COVERAGE

The following matters are expressly excluded from the coverage of this policy, and the Company will not pay loss or damage, costs, attorneys' fees, or expenses that arise by reason of:

1. (a) Any law, ordinance, permit, or governmental regulation (including those relating to building and zoning) restricting, regulating, prohibiting, or relating to

(i) the occupancy, use, or enjoyment of the Land;
(ii) the character, dimensions, or location of any improvement erected on the Land;
(iii) the subdivision of land; or
(iv) environmental protection;

or the effect of any violation of these laws, ordinances, or governmental regulations. This Exclusion 1(a) does not modify or limit the coverage provided under Covered Risk 5, 6, 13(c), 13(d), 14 or 16.
(b) Any governmental police power. This Exclusion 1(b) does not modify or limit the coverage provided under Covered Risk 5, 6, 13(c), 13(d), 14 or 16.
2. Rights of eminent domain. This Exclusion does not modify or limit the coverage provided under Covered Risk 7 or 8.
3. Defects, liens, encumbrances, adverse claims, or other matters
(a) created, suffered, assumed, or agreed to by the Insured Claimant;
(b) not Known to the Company, not recorded in the Public Records at Date of Policy, but Known to the Insured Claimant and not disclosed in writing to the Company by the Insured Claimant prior to the date the Insured Claimant became an Insured under this policy;
(c) resulting in no loss or damage to the Insured Claimant;
(d) attaching or created subsequent to Date of Policy (however, this does not modify or limit the coverage provided under Covered Risk 11, 16, 17, 18, 19, 20, 21, 22, 23, 24, 27 or 28); or
(e) resulting in loss or damage that would not have been sustained if the Insured Claimant had paid value for the Insured Mortgage.
4. Unenforceability of the lien of the Insured Mortgage because of the inability or failure of an Insured to comply with applicable doing-business laws of the state where the Land is situated.
5. Invalidity or unenforceability in whole or in part of the lien of the Insured Mortgage that arises out of the transaction evidenced by the Insured Mortgage and is based upon usury or any consumer credit protection or truth-in-lending law. This Exclusion does not modify or limit the coverage provided in Covered Risk 26.
6. Any claim of invalidity, unenforceability or lack of priority of the lien of the Insured Mortgage as to Advances or modifications made after the

Insured has Knowledge that the vestee shown in Schedule A is no longer the owner of the estate or interest covered by this policy. This Exclusion does not modify or limit the coverage provided in Covered Risk 11.

7. Any lien on the Title for real estate taxes or assessments imposed by governmental authority and created or attaching subsequent to Date of Policy. This Exclusion does not modify or limit the coverage provided in Covered Risk 11(b) or 25.
8. The failure of the residential structure, or any portion of it, to have been constructed before, on or after Date of Policy in accordance with applicable building codes. This Exclusion does not modify or limit the coverage provided in Covered Risk 5 or 6.
9. Any claim, by reason of the operation of federal bankruptcy, state insolvency, or similar creditors' rights laws, that the transaction creating the lien of the Insured Mortgage, is
   (a) a fraudulent conveyance or fraudulent transfer, or
   (b) a preferential transfer for any reason not stated in Covered Risk 27(b) of this policy.
10. Contamination, explosion, fire, flooding, vibration, fracturing, earthquake, or subsidence.
11. Negligence by a person or an Entity exercising a right to extract or develop minerals, water, or any other substances.

First American Title™

Privacy Notice

Effective: October 1, 2019

Notice Last Updated: January 1, 2021

This Privacy Notice describes how First American Financial Corporation and its subsidiaries and affiliates (together referred to as "First American," "we," "us," or "our") collect, use, store, and share your information. This Privacy Notice applies to information we receive from you offline only, as well as from third parties, when you interact with us and/or use and access our services and products ("Products"). For more information about our privacy practices, including our online practices, please visit https://www.firstam.com/privacy-policy/. The practices described in this Privacy Notice are subject to applicable laws in the places in which we operate.

What Type Of Information Do We Collect About You? We collect a variety of categories of information about you. To learn more about the categories of information we collect, please visit https://www.firstam.com/privacy-policy/.

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How Do We Use Your Information? We may use your information in a variety of ways, including but not limited to providing the services you have requested, fulfilling your transactions, comply with relevant laws and our policies, and handling a claim. To learn more about how we may use your information, please visit https://www.firstam.com/privacy-policy/.

How Do We Share Your Information? We do not sell your personal information. We only share your information, including to subsidiaries, affiliates, and to unaffiliated third parties: (1) with your consent; (2) in a business transfer; (3) to service providers; and (4) for legal process and protection. To learn more about how we share your information, please visit https://www.firstam.com/privacy-policy/.

How Do We Store and Protect Your Information? The security of your information is important to us. That is why we take commercially reasonable steps to make sure your information is protected. We use our best efforts to maintain commercially reasonable technical, organizational, and physical safeguards, consistent with applicable law, to protect your information.

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Contact Us dataprivacy@firstam.com or toll free at 1-866-718-0097.

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First American Title™

For California Residents

If you are a California resident, you may have certain rights under California law, including but not limited to the California Consumer Privacy Act of 2018 ("CCPA"). All phrases used in this section shall have the same meaning as those phrases are used under California law, including the CCPA.

Right to Know. You have a right to request that we disclose the following information to you: (1) the categories of personal information we have collected about or from you; (2) the categories of sources from which the personal information was collected; (3) the business or commercial purpose for such collection and/or disclosure; (4) the categories of third parties with whom we have shared your personal information; and (5) the specific pieces of your personal information we have collected. To submit a verified request for this information, go to our online privacy policy at www.firstam.com/privacy-policy to submit your request or call toll-free at 1-866-718-0097. You may also designate an authorized agent to submit a request on your behalf by going to our online privacy policy at www.firstam.com/privacy-policy to submit your request or by calling toll-free at 1-866-718-0097.

Right of Deletion. You also have a right to request that we delete the personal information we have collected from and about you. This right is subject to certain exceptions available under the CCPA and other applicable law. To submit a verified request for deletion, go to our online privacy policy at www.firstam.com/privacy-policy to submit your request or call toll-free at 1-866-718-0097. You may also designate an authorized agent to submit a request on your behalf by going to our online privacy policy at www.firstam.com/privacy-policy to submit your request or by calling toll-free at 1-866-718-0097.

Verification Process. For either a request to know or delete, we will verify your identity before responding to your request. To verify your identity, we will generally match the identifying information provided in your request with the information we have on file about you. Depending on the sensitivity of the information requested, we may also utilize more stringent verification methods to verify your identity, including but not limited to requesting additional information from you and/or requiring you to sign a declaration under penalty of perjury.

Notice of Sale. We do not sell California resident information, nor have we sold California resident information in the past 12 months. We have no actual knowledge of selling the information of minors under the age of 16.

Right of Non-Discrimination. You have a right to exercise your rights under California law, including under the CCPA, without suffering discrimination. Accordingly, First American will not discriminate against you in any way if you choose to exercise your rights under the CCPA.

Notice of Collection. To learn more about the categories of personal information we have collected about California residents over the last 12 months, please see "What Information Do We Collect About You" in https://www.firstam.com/privacy-policy. To learn about the sources from which we have collected that information, the business and commercial purpose for its collection, and the categories of third parties with whom we have shared that information, please see "How Do We Collect Your Information", "How Do We Use Your Information", and "How Do We Share Your Information" in https://www.firstam.com/privacy-policy.

Notice of Sale. We have not sold the personal information of California residents in the past 12 months.

Notice of Disclosure. To learn more about the categories of personal information we may have disclosed about California residents in the past 12 months, please see "How Do We Use Your Information" and "How Do We Share Your Information" in https://www.firstam.com/privacy-policy.

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REPORT:
Phase 1 Environmental Site Assessment
825 Drake Avenue
Marin City, California
Marin County APN 052-112-03

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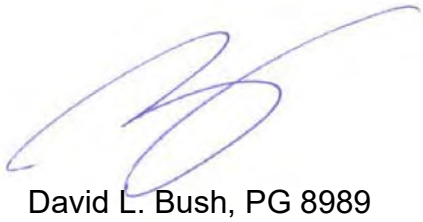

David L. Bush, PG 8989
Principal

Project #780.0220
February 18, 2020

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1.0 EXECUTIVE SUMMARY

Pursuant to the request and assignment of Ms. Kimberly Calica, AMG & Associates, Inc., P.O. Box 260770, Encino, CA 91426(Client), Environmental Geology Services (Consultant), performed a Phase I Environmental Site Assessment (ESA) on the referenced property located at 825 Drake Avenue, Marin City, Marin County, State of California (Plate 1, Site Location Map, Appendix A). The subject property lies within that real property referred to as Marin County Assessor Parcel Number (APN) 052-112-03.

Purpose

The Client has requested this Phase I Environmental Site Assessment (ESA) as part of their due diligence prior to purchasing the property for potential redevelopment into a multi-unit residential development.

Scope of Work

Environmental Geology Services (EGS) and its' Environmental Professionals researched the site history and historical records to identify past and present land uses as part of due diligence to determine if Recognized Environmental Conditions (REC's), Historical REC's (HREC's), Controlled REC's (CREC's), or Vapor Encroachment Conditions (VEC's) may exist, or may have existed on the property. Our research attempted to identify these conditions as they may relate to hazardous substances or petroleum products released to, or that may have migrated in or through, the environment (soil, soil vapor, and groundwater). EGS also determined if *de minimis* conditions exist at the site. *De minimis* conditions are not REC's, HREC's, CREC's, or VEC's and are excluded from those definitions in accordance with ASTM E1527-13.

EGS's scope of research and records review consisted of subcontracting a regulatory agency records review to Environmental Data Resources, Inc., conducting file reviews and/or inquiries via the State GeoTracker Database, Department of Toxic Substances (DTSC) Control EnviroStor Database and at the Marin County Department of Public Works, Office of Waste Management (Local CUPA Agency), Marin County Community Development Agency, Marin City Community Services District, and San Francisco Bay Regional Water Quality Control Board (SFB-RWQCB), inquiries with the Client, review of historical aerial photography and topographical maps, and other historical records, as well as interviews with persons who have current and past knowledge of the property including (if available) the current property owner, Client's representatives and adjacent property owners and/or tenants if possible. In addition, our Environmental Professional conducted a site reconnaissance of the property to visually observe existing conditions. We also observed the adjacent properties to the extent possible without crossing property lines.

Site and Vicinity Characteristics

Surface topography slopes upward to the northwest from an elevation of 48 feet above mean sea level (MSL) in the southeast corner of the property, to 88 feet above MSL in the northwest portion of the property. The property is located in a residential area, with a nearby fire department and sheriff substation (850 Drake Avenue), and school (620 Drake Avenue), as well as a newly constructed city park located adjacent to the south of the subject site. The site is located on the north side of the Marin City basin, approximately 1500 feet west of US Highway 101 (Plate 1, Site Location map, Appendix A). The nearest primary surface water body to the site is Richardson Bay (which connects with the San Francisco Bay to the south), approximately 1800 feet east of the site.

Site Description and Current Use

The property consists of Marin County APN 052-112-03, which totals approximately 1.01+/- acres (Plate 3, AP Map, Appendix A). The subject property is currently developed with a triple wide manufactured home, with associated walkways, handicap accessible ramps, a small storage shed, and asphaltic driveway and parking lot. The subject site is owned by the Village Baptist Church, and has been used as the church's primary location until the end of July 2015 when the church relocated its facility to Petaluma, CA.

Previous Site Use and History

The area of Marin City, CA was initially developed during World War II, when Marinship Corporation had a shipyard nearby along Richardson Bay. The area of the subject site was developed with single family homes for the shipyard workers, including at least six (6) homes on the subject site. An original driveway is still present along Park Circle, west of the existing triple wide structure.

It is our understanding that the Village Baptist Church originally began in approximately 1958 in four of these former homes. In 1965, the Village Baptist Church constructed a new facility on the property in the southeastern portion. This structure was the primary church facility on the property until a fire destroyed the church in October 1999. The church retained a licensed contractor who encapsulated the burned structure, and removed approximately 88.49 tons of asbestos containing material (ACM). The ACM was loaded, hauled and disposed of under permit ID S112915955 and EPA ID CAC002365527.

Following removal of the ACM, the church retained a licensed contractor to demolish the former church facility under permit with the Marin County Community Development Agency.

The former building pad of the church is evident in the eastern portion of the property. The Village Baptist Church then temporarily replaced their original church with the existing triple wide facility, and used the temporary facility until their 2015 move to Petaluma, CA.

During the mid-1980's, the Village Baptist Church split the original property into two lots, and developed a 25-unit senior housing complex, The Village Oduduwa, located adjacent to the north of the subject site.

Surrounding Area Development

Surrounding area development consists of residential and public use buildings and facilities as follows:

North of site – Residential

East of site – Residential

South of site – Mixed use residential, a newly constructed public park (George "Rocky" Graham Park), and a Sheriff and Fire Department Building at 850 Drake Avenue

West of site – Mixed use residential and a recreation center

Regulatory Records Review

Based on our review of the regulatory agencies (Marin County Department of Public Works, Office of Waste Management (Local CUPA Agency), Marin County Community Development Agency, Marin City Community Services District, and San Francisco Bay Regional Water Quality Control Board (SFB-RWQCB), as well as the attached historical database information (Appendices C through G), there were no active or historical environmental investigations documented at the subject site.

As part of our records review EGS researched the California State Geotracker Database and Department of Toxic Substances Control (DTSC) Envirostor Database to identify current or historic environmental concerns at or near the subject site, with no investigations reported on the subject site. Only one site is listed on the Geotracker Database within 1000 feet of the subject property as follows:

1) Apollo Cleaners, located at 160 Donahue Street, approximately 800 feet southeast of the site, Geotracker Global IDSL0604181210, environmental investigation related to a release of solvents used in dry cleaning facilities (PCE), case closed July 16, 2007.

EGS also reviewed the attached subcontracted database search provided by Environmental Data Resources (EDR) and identified two additional sites within 1000 feet of the subject site that had underground storage tanks containing petroleum products. EGS inquired with the local CUPA agency (Marin County Office of Waste Management, MCWM), and discovered the following:

1) 850 Drake Avenue, Marin City, Fire Department facility – a 1000 gallon underground storage tank (UST) had been permitted by the MCWM, and was removed on August 21, 1998 due to proposed replacement of the UST with aboveground storage tanks (AST's). The UST removal was completed under the supervision and August 14, 1998 permit of the MCWM, and completed by MCL Underground Tank Testing. Soil samples were collected from beneath the former UST at the time of removal. No investigation was pursued by the MCWM nor the SFB-RWQCB related to the UST. The current facility at 850 Drake Avenue (existing fire department and sheriff office) is permitted by the MCWM to storage approximately 1600 gallons of petroleum product in AST's (Permit #60-0277).

2) 620 Drake Avenue, Marin City, former Manzanita School – a 1000 gallon underground storage tank (UST) had been permitted by the MCWM (Facility ID058573), and was removed on April 25, 1996 due to a delivery line leak test failure. The UST removal was completed under the supervision and April 6, 1996 permit of the MCWM, and completed by Tank Protect Engineering. Soil samples were collected from beneath the former UST at the time of removal. No investigation was pursued by the MCWM nor the SFB-RWQCB related to the UST.

Conclusions

Based on our site research, file reviews, site reconnaissance, and in accordance with the US EPA's All Appropriate Inquiries (AAI) and ASTM E1527-13 Standard of Practice, Environmental Geology Services provides the following conclusions:

Recognized Environmental Conditions (REC): There were no REC's observed on or nearby the subject property;

Historical REC's (HREC's): There were no HREC's observed on or nearby the subject property;

Controlled REC's (CREC's): There were no CREC's observed on or nearby the subject property;

Vapor Encroachment Conditions (VEC's): There were no VEC's observed on or nearby the subject property;

***De minimus* Conditions**: We did not observe conditions that would be considered *de minimus*.

Other Environmental Considerations: EGS provides no additional environmental considerations for the subject site.

The terms Recognized Environmental Conditions (REC), Historical REC's (HREC's), Controlled REC's (CREC's), migrate/migration (related to VEC's), and *de minimis* conditions are defined, pursuant to the ASTM E1527-13 Standard of Practice, in section 2.1.1 of this report, along with other pertinent definitions.

Finally, EGS has concluded that under the US EPA's All Appropriate Inquiry rule and the ASTM E1527-13 Standard of Practice (discussed further in Section 2.1 of this report), there were no current conditions observed at this site, and adjacent sites, at the time of our site reconnaissance that were indicative of an existing release, a past release or a material threat of a release of hazardous substances including petroleum products to the environment.

Recommendations

Based on the above conclusions, EGS makes the following recommendations for the site:

- EGS makes no recommendations for this site.

The following sections present the Phase I Environmental Site Assessment (Phase I ESA), prepared in accordance with the ASTM E1527-13 Standard of Practice and the US EPA's All Appropriate Inquiries (AAI).

2.0 INTRODUCTION

It is our understanding that Ms. Kimberly Calica, AMG & Associates, Inc., P.O. Box 260770, Encino, CA 91426(Client), is in the process of purchasing the property. The Client wants to manage potential environmental risks and comply with due diligence pursuant to the ASTM E-1527-13 Standard of Practice and the US EPA's All Appropriate Inquiries (AAI) standards through this Phase I ESA (as described below) prior to purchasing the property for a residential redevelopment project.

2.1 Purpose

The purpose of this Phase I ESA is to provide a review and evaluation of existing available information concerning the property herein referred to as 825 Drake Avenue or subject property or subject site (Plate 1, Site Location Map).

Information for this Phase I ESA was provided by the Client and their representatives, as well as from interviews with persons who have knowledge of the property including the property owner, our review and evaluation of currently available information concerning the property as contained in various records of the federal, state, tribal, and local government regulatory agencies concerned with the property.

The purpose of a Phase I ESA is to provide information as to the presence, if any, of Recognized Environmental Conditions (REC's), Historical Recognized Environmental Conditions (HREC's), Controlled Recognized Environmental Conditions (CREC's), or Vapor Encroachment Conditions (VEC's) which may or may not be in connection with the subject property or properties near the subject property.

This Phase I Environmental Site Assessment generally follows the guidelines established by the American Society for Testing and Materials (ASTM) in the document entitled "Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process" and designated E 1527-13 and also incorporates requirements of the US EPA's All Appropriate Inquiries (AAI) rule (40 C.F.R. Part 312, Standards for Conducting All Appropriate Inquiries).

The goal of the Phase I ESA is to identify Recognized Environmental Conditions with respect to the range of contaminants within the scope of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) and petroleum products. Under the AAI rule this Phase I ESA also serves to identify conditions indicative of an existing release, a past release, or a material threat of a release of any hazardous substances or petroleum products, in, on, at or nearby the subject site.

As such, this assessment is intended to permit the Client to satisfy one of the requirements to qualify for the innocent landowner defense for CERCLA liability. Nevertheless, the Client should consult with an attorney to fully cover legal questions and to determine additional requirements needed to qualify for the innocent landowner defense for CERCLA liability, should the need for such a defense arise or be of concern to the Client.

The Scope of Services for this Phase I Environmental Site Assessment as conducted by EGS consisted of four components: Records Review, Site Reconnaissance, Interviews, and Report. The objective of the first three components under the ASTM standard is to help identify REC's, HREC's, CREC's, or VEC's in connection with the aforementioned property.

2.1.1 Definitions

As part of this Phase I Environmental Site Assessment, the following definitions are presented in accordance with ASTM E1527-13 Standard of Practice and/or the US EPA's AAI Rule.

- Recognized Environmental Condition (REC):

  "The presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: 1) due to any release to the environment, 2) under conditions indicative of a release to the environment, or 3) under conditions that pose a material threat of a future release to the environment. *De minimis* conditions are not considered recognized environmental conditions."

- Release:

  A release of any hazardous substance or petroleum product shall have the same meaning as the definition of release in CERCLA 42 U.S.C. § 9601(22) – "any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment (including the abandonment or discharging of barrels, containers, and other closed receptacles containing hazardous substances or pollutant or contaminant."

- Environment:

  "Environment shall have the same meaning as the definition of environment in CERCLA 42 U.S.C. § 9601(8) – "The term environment includes A) the navigable waters of the contiguous zones, and the ocean waters, and B) any other surface water, groundwater, drinking water supply, land surface or subsurface strata."

- *De Minimis* Condition:

  "A condition that generally does not present a threat to human health or the environment and that generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies. Conditions determined to be *de minimis* conditions are not recognized environmental conditions nor controlled recognized environmental conditions."

- Controlled Recognized Environmental Condition (CREC):

  "A recognized environmental condition resulting from a past release of hazardous substances or petroleum products that has been addressed to the satisfaction of the applicable regulatory authority (for example, as evidenced by the issuance of a no further action letter or equivalent, or meeting risk-based criteria established by regulatory authority), with hazardous substances or petroleum products allowed to remain in place subject to the implementation of required controls (for example, property use restrictions, activity and use limitations, institutional controls, or engineering controls). A condition considered by the environmental professional to be a controlled recognized environmental condition shall be listed in the findings section of the Phase I Environmental Site Assessment report, and as a recognized environmental condition in the conclusions section of the Phase I Environmental Site Assessment report."

- Historical Recognized Environmental Condition (HREC):

  "A past release of any hazardous substances or petroleum products that has occurred in connection with the property and has been addressed to the satisfaction of the applicable regulatory authority or meeting unrestricted use criteria established by a regulatory authority, without subjecting the property to any required controls (for example, property use restrictions, activity and use limitations, institutional controls, or engineering controls). Before calling the past release a historical recognized environmental condition, the environmental professional must determine whether the past release is a recognized environmental condition at the time the Phase I Environmental Site Assessment is conducted (for example, if there has been a change in the regulatory criteria). If the EP considers the past release to be a recognized environmental condition at the time the Phase I ESA is conducted, the condition shall be included in the conclusions section of the report as a recognized environmental condition."

- Activity and Use Limitations (AUL's):

  "Legal or physical restrictions or limitations on the use of, or access to, a site or facility: (1) to reduce or eliminate potential exposure to hazardous substances or petroleum products in the soil, soil vapor, groundwater, and/or surface water on the property, or (2) to prevent activities that could interfere with the effectiveness of a response action, in order to ensure maintenance of a condition of no significant risk to public health or the environment. These legal or physical restrictions, which may include institutional and/or engineering controls, are intended to prevent

adverse impacts to individuals or populations that may be exposed to hazardous substances and petroleum products in the soil, soil vapor, groundwater, and/or surface water on the property."

- All Appropriate Inquiries:

  "That inquiry constituting all appropriate inquiries into the previous ownership and uses of the property consistent with good commercial and customary practice as defined in CERCLA, 42 U.S.C §9601(35)(B), that will qualify a party to a commercial real estate transaction for one of the threshold criteria for satisfying the LLPs to CERCLA liability (42 U.S.C §9601(35)(A) & (B), §9607(b)(3), §9607(q); and §9607(r)), assuming compliance with other elements of the defense."

- CERCLA:

  Comprehensive Environmental Response, Compensation and Liability Act (42 U.S.C §9601)

- Data Gap:

  "A lack of, or inability to, obtain information required by this practice despite good faith efforts by the environmental professional to gather such information. Data gaps may result from incompleteness in any of the activities required by this practice, including, but not limited to site reconnaissance (for example, an inability to conduct the site visit), and interviews (for example, an inability to interview the key site manager, regulatory officials, etc.)."

- Due Diligence:

  "The process of inquiring into the environmental characteristics of a parcel of commercial real estate or other conditions, usually in connection with a commercial real estate transaction. The degree and kind of due diligence vary for different properties and differing purposes."

- Environmental Professional:

  As defined in ASTM E1527-13: *(1)* a person who possesses sufficient specific education, training, and experience necessary to exercise professional judgment to develop opinions and conclusions regarding conditions indicative of releases or threatened releases (see §312.1(c)) on, at, in, or to a property, sufficient to meet the objectives and performance factors in §312.20(e) and (f). *(2)* Such a person must: (i) hold a current Professional Engineer's or Professional Geologist's license or registration from a state, tribe, or U.S. territory (or the Commonwealth of Puerto Rico) and have the equivalent of three (3) years of full-time relevant experience; or (ii) be licensed or certified by the federal government, a state, tribe, or U.S. territory (or the Commonwealth of Puerto Rico) to perform environmental inquiries as defined in §312.21 and have the equivalent of three (3) years of full-time relevant experience; or (iii) have a Baccalaureate or higher degree from an accredited institution of higher education in a discipline of engineering or science and the equivalent of five (5) years of full-time relevant experience; or

(iv) have the equivalent of ten (10) years of full-time relevant experience. *(3)* An environmental professional should remain current in his or her field through participation in continuing education or other activities. *(4)* The definition of environmental professional provided above does not preempt state professional licensing or registration requirements such as those for a professional geologist, engineer, or site remediation professional. Before commencing work, a person should determine the applicability of state professional licensing or registration laws to the activities to be undertaken as part of the inquiry identified in §312.21(b). *(5)* A person who does not qualify as an environmental professional under the foregoing definition may assist in the conduct of all appropriate inquiries in accordance with this part if such person is under the supervision or responsible charge of a person meeting the definition of an environmental professional provided above when conducting such activities. *Relevant experience:* as used in the definition of environmental professional in this section, means: participation in the performance of all appropriate inquiries investigations, environmental site assessments, or other site investigations that may include environmental analyses, investigations, and remediation which involve the understanding of surface and subsurface environmental conditions and the processes used to evaluate these conditions and for which professional judgment was used to develop opinions regarding conditions indicative of releases or threatened releases (see §312.1(c)) to the subject property.

- Innocent Landowner Defense:

"Under CERCLA (42 U.S.C. §§9601(35) & 9607(b)(3)) - a person may qualify as one of three types of innocent landowners: (i) a person who "did not know and had no reason to know" that contamination existed on the property at the time the purchaser acquired the property; (ii) a government entity which acquired the property by escheat, or through any other involuntary transfer or acquisition, or through the exercise of eminent domain authority by purchase or condemnation; and (iii) a person who "acquired the facility by inheritance or bequest." To qualify for the innocent landowner defense, such person must have made all appropriate inquiries on or before the date of purchase. Furthermore, the all appropriate inquiries must not have resulted in knowledge of the contamination. If it does, then such person did "know" or "had reason to know" of contamination and would not be eligible for the innocent landowner defense."

- Landowner Liability Protections (LLP's):

"Landowner liability protections under CERCLA; these protections include the bona fide prospective purchaser liability protection, contiguous property owner liability protection, and innocent landowner defense from CERCLA liability. See 42 U.S.C. §§9601(35)(A), 9601(40), 9607(b), 9607(q), 9607(r)."

- Material Threat:

  "A physically observable or obvious threat which is reasonably likely to lead to a release that, in the opinion of the environmental professional, is threatening, and might result in impact to public health or the environment. An example might include an aboveground storage tank system that contains a hazardous substance and which *shows evidence of damage*. The *damage* would represent a material threat if it is deemed serious enough that it may cause or contribute to tank integrity failure with a release of contents to the environment."

- Migrate/Migration:

  "For the purposes of this practice, "migrate" and "migration" refers to the movement of hazardous substances or petroleum products in any form, including, for example, solid and liquid at the surface or subsurface, and vapor in the subsurface, See Note 4."…."NOTE 4—Vapor migration in the subsurface is described in Guide E2600; however, nothing in this practice should be construed to require application of the Guide E2600 standard to achieve compliance with all appropriate inquiries."

- User:

  "The party seeking to use Practice E1527 to complete an environmental site assessment of the property. A user may include, without limitation, a potential purchaser of property, a potential tenant of property, an owner of property, a lender, or a property manager. The user has specific obligations for completing a successful application of this practice…"

2.2 Scope of Services

The Scope of Services for this Phase I Environmental Site Assessment consists of four overall tasks:

- Task I: Research and review of regulatory information.
- Task II: A site reconnaissance of subject property and overview of nearby property.
- Task III: Interviews of persons with knowledge of subject and surrounding property.
- Task IV: Preparation of the final Environmental Site Assessment Report.

The Scope of Services for this Phase I Environmental Site Assessment generally follows the Standard Practice for Environmental Site Assessments designated as ASTM E1527-13 and the US EPA's All Appropriate Inquiries (AAI) rule. Accordingly, the Phase I Environmental Site Assessment is targeted toward the range of contaminants within the scope of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) and petroleum products. As such, "appropriate inquiry into the previous ownership and uses of the property consistent with good commercial or customary practice" as defined in 42 USC

9601(35)(B) is applied within the AAI rule. However, an evaluation of business environmental risk associated with a parcel of commercial real estate may necessitate investigation beyond that identified in this assessment.

With regard to Task II, the site reconnaissance or site visit, the AAI standards recognize that this is one component of the assessment that should be conducted by a qualified Environmental Professional (or EP) as defined by the EPA. Therefore all site visits made by EGS were conducted by EP's (Refer to Section 11.0 of their Proof of Qualifications).

The Scope of Services includes observations for Recognized Environmental Conditions, as well as information that can be obtained from regulatory files that are obtainable without investigation into archives of the various agencies. Accordingly, it cannot be guaranteed that all files are examined or that every contingency is investigated. In some cases entities such as tribal authorities may have no records or they may not be open to review. These limitations are in conformance with the stated guidelines of ASTM Standard of Practice E 1527-13.

The Records Review includes files available at federal, state, county, tribal, local, and other public agency offices or databases as listed in Section 5.1 and 5.2 of this report. In some cases, the status of a site is determined from telephone interviews of staff persons of these offices. The Site Reconnaissance consists of the subject property, adjacent properties (especially with regard to storage tanks), and the identification of nearby properties. Interviews are conducted of persons reasonably available at the time of the Site Reconnaissance, and on occasion, by telephone when such interviews are possible. The report format generally follows the guidelines of the ASTM E 1527-13 Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process, and as modified by the US EPA AAI rule.

2.2.1 Exclusions

Pursuant to the ASTM E-1527-13 Standard of Practice and the US EPA AAI rule, Recognized Environmental Conditions *do not include* Asbestos Containing Materials, Mold, Radon, or Lead-based paint or other non-CERCLA related conditions (i.e. biological agents, cultural and historic resources, ecological resources, endangered species, health and safety, indoor air quality [unrelated to releases of hazardous substances or petroleum products into the environment], industrial hygiene, lead in drinking water, regulatory compliance, wetlands, flood zones, soils, groundwater, and geologic conditions, etc.). Therefore identification or assessment of these conditions is not a part of this scope of work; however, we may include these conditions as *other environmental considerations* in our conclusions if we identify their presence or potential presence.

We recommend that the Client consult with a professional specializing in these areas to conduct an assessment for these issues, if needed.

2.3 Significant Assumptions

The Phase I Environmental Site Assessment (ESA) is intended to assess the environmental conditions of the referenced parcel(s) of real property. It is intended to constitute all appropriate inquiry for purposes of CERCLA's innocent landowner defense; however, it is not intended to be limited to that purpose. Also under the AAI rule a Phase I ESA alone does not provide the landowner with protection against CERCLA liability. Failure to identify an environmental condition during AAI does not relieve the landowner from complying with other statutory requirements for obtaining liability protections.

This Phase I ESA is intended to reflect a commercially prudent and reasonable inquiry designed to recognize environmental conditions in connection with a property or properties.

It is understood by the parties hereto, that the Client is requesting the assessment set forth in this ESA, to comply with due diligence, and to evaluate environmental risk prior to purchasing the property. We assume that the Client, and all other parties we contacted, have acted in good faith, and provided complete information based on their knowledge and understanding of the property and its history.

Lastly, we assume that the records we reviewed, and those records searched through our database subcontractor, are reasonably complete and accurate.

2.4 Limitations and Exceptions

The Scope of Services performed to complete this Phase I ESA is limited in nature. While we consider work of this type to be valuable in the preliminary evaluation of potential hazardous materials or waste at a site, we also must alert the Client that this assessment may not reveal hazardous materials releases that have occurred at this site. We also must alert the Client that this assessment may not reveal existing underground storage tanks (UST's) if the UST(s) is covered and not visible during our inspection, or if the UST's were not permitted. Our site inspection is limited to visible conditions only. Also, the site conditions can change with time, and our assessment is not intended to predict future or hidden site conditions. Because of the limited nature of this assessment, this report is not a risk assessment and the Scope of Services does not include a determination of the extent of business environmental risk nor the public health impact of, known, or suspected hazardous materials or wastes.

This service has been performed in accordance with generally accepted environmental assessment practices for similar Phase I ESA's conducted at this time and in this geographic area. No other guarantees or warranties, expressed or implied, are provided.

No samples were collected or analyzed as a scope of this Phase I ESA. The scope of work for this Phase I Environmental Site Assessment of potential hazardous materials, *excludes* wetland issues, determination of flood zones, as well as addressing or sampling for suspect mold, asbestos containing materials (ACM), radon, or lead at the property. Refer also to Section 2.1.1 of this report for additional exclusions.

Under the AAI rule, a Phase I ESA alone does not provide the landowner with protection against CERCLA liability. Failure to identify an environmental condition during AAI does not relieve the landowner from complying with other statutory requirements for obtaining liability protections. Our scope of services expressly excludes the determination of additional liability protections that may be required by the Client or landowner. Expert legal counsel should be obtained for such a determination.

The AAI rule states that searches for environmental liens must be conducted, however AAI indicates this may be a user responsibility. For purposes of this Phase I ESA our search for environmental liens was limited to what was provided to us by the Client or by our subcontracted regulatory records search company Environmental Data Resources, Inc. (EDR), or available in the Title Report if provided. If we encountered an environmental lien as part of that scope of services it is reported. An additional search of environmental liens was not included in the scope of work and the Client is advised that reports of environmental liens if contained herein are not to be construed as a complete listing of such liens.

We understand that the Client agrees to hold Consultant harmless for any inverse condemnation or devaluation of said property that may result if the Consultant's report, or information generated, is used for other purposes. Although not a part of our scope of work, we are prepared to meet with the Client and discuss the findings, if so requested. Because property uses and conditions can change over time, this Phase I ESA is valid for a period of 180 days from its date of issue (see Section 2.9 Shelf Life). However, if during this 180 day period any of the interested parties become aware of any changed condition it is the responsibility of that person to notify the Client. EGS and its subcontractors are explicitly exempt from liabilities associated with changed conditions that occur after the date of our last site visit.

2.5 Data Gaps

This section addresses the US EPA's All Appropriate Inquiries (AAI) rule for documentation of data gaps. As defined by the ASTM E 1527-13, a data gap is defined as:

> "A lack of, or inability to, obtain information required by this practice despite good faith efforts by the environmental professional to gather such information. Data gaps may result from incompleteness in any of the activities required by this practice, including, but not limited to site reconnaissance (for example, an inability to conduct the site visit), and interviews (for example, an inability to interview the key site manager, regulatory officials, etc.)."

EGS documents the following data gaps related to this Phase I ESA:

The ownership of the property was based information provided to EGS by Client as well as the current owner, and our review of the site history was based on our review of historical aerial and topographic mapping and EDR database searches. The current owner, Village Baptist Church, has occupied the property dating back to at least the late 1950's (~1958). Prior to that time, the site was residentially developed. We did not research the site ownership and use prior to 1942 since.

2.6 Special Terms and Conditions

The Scope of Services for this Phase I Environmental Site Assessment does not include analysis of Asbestos Containing Materials (ACM), although if obvious visual indications of ACM are observed, they are reported. Neither does the Scope of Services include analysis of the building constituents for mold, lead based paint, lead in water pipes or fixtures, or other non-CERCLA related conditions (i.e., biological agents, cultural and historic resources, ecological resources, endangered species, health and safety, indoor air quality [unrelated to releases of hazardous substances or petroleum products into the environment], industrial hygiene, lead in drinking water, regulatory compliance, wetlands, flood zones, soils, groundwater, and geologic conditions, etc.).

It is our understanding that the Client, and the Client's agents, agree to limit the use of information developed about this property and presented herein, to making risk decisions prior to purchasing the property. No other use or disclosure is intended by Consultant.

Client agrees to hold Consultant harmless for any inverse condemnation or devaluation of said property that may result if the Consultant's report or information generated is used for other purposes. Also, this report is issued with the understanding that it is to be used only in its entirety and is valid for 180 days from the date of issue.

2.7 User Reliance

Only Ms. Kimberly Calica, AMG & Associates, Inc., P.O. Box 260770, Encino, CA 91426 (Client), their representatives and their agents may rely upon this report. No other person or entity may have reliance upon this report without the express written consent of EGS (Consultant).

2.8 Involved Parties

The primary parties involved are the Client, Ms. Kimberly Calica, AMG & Associates, Inc., P.O. Box 260770, San Rafael, CA 94903, who is in the process of purchasing the property, Mr. David L Bush, Consultant for EGS and the Environmental Professional (EP) who prepared this ESA. These parties are also listed in Section 7.0.

2.9 Shelf Life

The US EPA's AAI rule guidance considers a Phase I ESA *generally* valid for a period of up to one year provided there are no material changes to the use of, the property and the condition of, the property.

Because of the likelihood of changed conditions, the US EPA advises that after 180 days from the date of issue, the following sections of the Phase I ESA should be updated: 1) interviews, 2) reviews of federal, state, tribal, and local government records, 3) searches for recorded environmental cleanup liens, 4) visual site and adjoining property inspections (site and area reconnaissance), 5) declaration by Environmental Professional responsible for the assessment or update.

It is the position of EGS and the ASTM E 1527-13 (Section 4.0) that the Phase I ESA should not be relied upon if there is any material change to the use of and the condition of the property since the date of the Phase I ESA, and in all cases the Phase I ESA should not be considered valid after 180 days. This ESA is issued with the 180 day shelf life as a limit (see Section 2.4 Limitations and Exceptions).

3.0 GENERAL PROPERTY CHARACTERISTICS

3.1 Site Location and Legal Description

Site and Address: 825 Drake Avenue
Marin City, CA

County: Marin

Assessor's Designation: 052-112-03

U. S. G. S. Quadrangle: Point Bonita, 7.5'

Latitude, Longitude: 38 degrees, 52' 28.20" North, 122 degrees 30' 50.19" West

3.2 Site and Vicinity General Characteristics

Surface topography slopes upward to the northwest from an elevation of 48 feet above mean sea level (MSL) in the southeast corner of the property, to 88 feet above MSL in the northwest portion of the property. The property is located in a residential area, with a nearby fire department and sheriff substation (850 Drake Avenue), and school (620 Drake Avenue), as well as a newly constructed city park located adjacent to the south of the subject site. The site is located on the north side of the Marin City basin, approximately 1500 feet west of US Highway 101 (Plate 1, Site Location map, Appendix A). The nearest primary surface water body to the site is Richardson Bay (which connects with the San Francisco Bay to the south), approximately 1800 feet east of the site.

3.3 Current Use of the Property

The property consists of Marin County APN 052-112-03, which totals approximately 1.01+/- acres (Plate 3, AP Map, Appendix A). The subject property is currently developed with a triple wide manufactured home, with associated walkways, handicap accessible ramps, a small storage shed, and asphaltic driveway and parking lot. The subject site is owned by the Village Baptist Church, and has been used as the church's primary location until the end of July 2015 when the church relocated its facility to Petaluma, CA.

3.4 Description of Improvements

At the time of our February 15, 2020 site inspection, the subject property was developed with a triple wide manufactured home, with associated walkways, handicap accessible ramps, a small

storage shed, and asphaltic driveway and parking lot. The subject site is owned by the Village Baptist Church, and has been used as the church's primary location until the end of July 2015 when the church relocated its facility to Petaluma, CA.

3.4.1 Structures

The subject property is currently developed with a triple wide manufactured home, with associated walkways, handicap accessible ramps, and a small storage shed.

3.4.2 Roads

Current access to the site is via Drake Avenue.

3.4.3 Sewage Disposal

The site is connected to municipal sewer service, no septic systems were observed.

3.4.4 Water Supply

The site is connected to municipal water service, no water supply wells were observed.

3.4.5 Heating and Cooling Systems

There is a heating/cooling unit in the triple wide structure on the property.

3.5 Current Use of Adjoining Properties

Surrounding area development consists of residential and public use buildings and facilities as follows:

North of site – Residential

East of site – Residential

South of site – Mixed use residential, a newly constructed public park (George "Rocky" Graham Park), and a Sheriff and Fire Department Building at 850 Drake Avenue

West of site – Mixed use residential and a recreation center

4.0 USER PROVIDED INFORMATION

4.1 Title Reports

Ms. Kimberly Calica, AMG & Associates, Inc. (Client), provided Environmental Geology Services with a copy of the Title Report dated November 25, 2019. Environmental Geology Services reviewed the Title Report (Appendix H) as part of our site research, and incorporated the information into this Phase I ESA.

4.2 Environmental Liens

The AAI rule states that searches for environmental liens must be conducted, however AAI indicates this may be a user responsibility. For purposes of this Phase I ESA our search for environmental liens was limited to what was provided to us by our subcontracted regulatory records search company Environmental Data Resources, Inc. (EDR), as well as the information included in the November 25, 2019 Title Report provided by Client, neither of which indicated an environmental lien associated with the property. Additional search for environmental liens was beyond the scope of our services and is the user's responsibility.

4.3 Use Limitations

The information contained in this Phase I ESA is for the sole use of Ms. Kimberly Calica, AMG & Associates, Inc., P.O. Box 260770, Encino, CA 91426 (Client), and their agents. No other person or entity may have reliance upon this report without the express written consent of EGS (Consultant). This report is to be used only in its entirety.

4.4 Specialized Knowledge

In an effort to maintain the innocent landowner defense, assessments of specialized knowledge or experience on the part of the purchaser or landowner is required by 40 CFR Part 312 Section 312.28 as follows:

> (a) Persons to whom this part is applicable per § 312.1(b) must take into account, their specialized knowledge of the subject property, the area surrounding the subject property, the conditions of adjoining properties, and any other experience relevant to the inquiry, for the purpose of identifying conditions indicative of releases or threatened releases at the subject property, as defined in § 312.1(c).
>
> (b) All appropriate inquiries, as outlined in § 312.20, are not complete unless the results of the inquiries take into account the relevant and applicable specialized knowledge and experience of the persons responsible for undertaking the inquiry (as described in §312.1(b)).

4.5 Valuation Reduction for Environmental Issues

In an effort to maintain the innocent landowner defense, a property valuation assessment must be completed, assuming there are no REC's, in accordance with 40 CFR Part 312 Section 312.29. EGS did not identify Recognized Environmental Conditions at this property. However, related to the valuation reduction for environmental issues, EGS recommends the Client seek professional assistance with property valuation matters.

The term Recognized Environmental Conditions is defined, pursuant to the ASTM 1527-13 Standard of Practice, in section 2.1 of this report.

4.6 Owner, Property Manager, and Occupant Information

Current Owner: The Village Baptist Church
3835 Cypress Drive, Petaluma, CA

4.7 Reason for Performing Phase I

This Phase I Environmental Site Assessment (ESA) was performed at the request of Ms. Kimberly Calica, AMG & Associates, Inc., P.O. Box 260770, Encino, CA 91426(Client) to provide a review and evaluation of existing available information concerning the subject property as part of their due diligence prior to purchasing the property.

The property consists of Marin County APN 052-112-03. This ESA was requested so the Client could evaluate environmental risk that might be associated with the property, prior to purchasing the property, as part of their due diligence in complying with CERCLA's innocent landowner defense. This Phase I ESA is intended to reflect a commercially prudent and reasonable inquiry designed to identify Recognized Environmental Conditions in connection with a property.

5.0 RECORDS REVIEW

The records review for this Phase I ESA consisted of subcontracting a regulatory agency file review to Environmental Data Resources, Inc. (EDR), conducting file reviews and/or inquiries via the State GeoTracker Database, DTSC's EnviroStor Database, and at the Marin County Department of Public Works, Office of Waste Management (Local CUPA Agency), Marin County Community Development Agency, Marin City Community Services District, and San Francisco Bay Regional Water Quality Control Board (SFB-RWQCB), inquiries with the Client, review of historical aerial photography and topographical maps, and other historical records, as well as interviews with persons who have current and past knowledge of the property including (if available) the current property owner, Client's representatives and adjacent property owners and/or tenants if possible.

5.1 Standard Environmental Records Sources

The ASTM E1527-13 and US EPA AAI standards include research of a number of sources of public information compiled by various regulatory agencies for their specific purposes. These include federal, state, tribal, and local agencies, and some of these sources contain overlapping information. If a site is listed with some of these agency databases it does not necessarily mean there is a contamination problem at the site, and if there is a problem at the listed site it does not necessarily mean the contamination extends off site to other properties. As noted above we retained the services of Environmental Data Resources, Inc. (EDR) to conduct an ASTM / AAI standard database search for this section of the Phase I ESA, using the subject site as the "target site". Distances and directions of listed sites below are referenced from the "target site", which is 825 Drake Avenue, Marin City, California.

The search by EDR looked at the sources which are listed and described in the EDR Radius Map™ and GeoCheck® Report dated February 5, 2020 (Appendix C). The findings and search distances for each database search are also summarized. The EDR Report includes a number of radius maps that locate and identify the various sites. The reader is advised to refer to the EDR report and its maps, which are attached to this report (Appendix C). The following subsections summarize any significant findings that were reported in the February 5, 2020 EDR Report (Appendix C).

Target Property: The subject site, located at 825 Drake Avenue was reported in the EDR Radius Map™ and GeoCheck® Report dated February 5, 2020 under the HAZNET database. The subject site appears on this database since Village Baptist Church retained a licensed contractor to properly abate approximately 88.49 tons of ACM at the site under permit S11915955 and EPA ID CAC002365527 after a fire burned the structure in October 1999. The subject site also appears on the ERNS database due to a

December 2009 report that a transformer fell from a pole and leaked mineral oil into a storm drain along Drake Avenue.

Surrounding Area: There are numerous sites reported in the EDR Radius Map™ and GeoCheck® Report dated February 5, 2020 (Refer to Appendix C). A brief review of the listed sites reveals that the potential for these sites to adversely impact the subject site is very low due to one or more of the following reasons: listing database not relevant, sufficient distance from Subject Property, location relative to site topography and ground water flow direction, subject site has no groundwater well, and the status of the listed site (e.g., closed, eligible for case closure, contamination characterized, contamination under remediation, etc.).

In addition to the above referenced database searches, a search of tribal records was conducted by EDR resulting in no sites that had a VCP (voluntary cleanup) of a UST within 0.25 miles of the target property area. As noted at the beginning of this section, the reader is advised to refer to the radius maps in the attached EDR report for additional database search results and other site information, and to read the attached EDR report (Appendix C) in its entirety, in conjunction with this Phase I ESA.

5.2 Additional Environmental Sources

As part of the Phase I ESA, EGS reviewed the California State Water Resources Control Board GeoTracker Database, the DTSC's EnviroStor Database, and contacted counter personnel at the Marin County Department of Public Works, Office of Waste Management (Local CUPA Agency), Marin County Community Development Agency, Marin City Community Services District, and San Francisco Bay Regional Water Quality Control Board (SFB-RWQCB) to determine if previous site investigations have occurred related to the referenced property. Based on our review of these agencies, no environmental investigations related to contamination produced from the subject site, nor nearby off site properties, were identified.

EGS provides the following additional information for the site:

Based on our review of the regulatory agencies (Marin County Department of Public Works, Office of Waste Management (Local CUPA Agency), Marin County Community Development Agency, Marin City Community Services District, and San Francisco Bay Regional Water Quality Control Board (SFB-RWQCB), as well as the attached historical database information (Appendices C through G), there were no active or historical environmental investigations documented at the subject site.

As part of our records review EGS researched the California State Geotracker Database and Department of Toxic Substances Control (DTSC) Envirostor Database to identify current or historic environmental concerns at or near the subject site, with no investigations reported on the subject site. Only one site is listed on the Geotracker Database within 1000 feet of the subject property as follows:

1) Apollo Cleaners, located at 160 Donahue Street, approximately 800 feet southeast of the site, Geotracker Global IDSL0604181210, environmental investigation related to a release of solvents used in dry cleaning facilities (PCE), case closed July 16, 2007.

EGS also reviewed the attached subcontracted database search provided by Environmental Data Resources (EDR) and identified two additional sites within 1000 feet of the subject site that had underground storage tanks containing petroleum products. EGS inquired with the local CUPA agency (Marin County Office of Waste Management, MCWM), and discovered the following:

1) 850 Drake Avenue, Marin City, Fire Department facility – a 1000 gallon underground storage tank (UST) had been permitted by the MCWM, and was removed on August 21, 1998 due to proposed replacement of the UST with aboveground storage tanks (AST's). The UST removal was completed under the supervision and August 14, 1998 permit of the MCWM, and completed by MCL Underground Tank Testing. Soil samples were collected from beneath the former UST at the time of removal. No investigation was pursued by the MCWM nor the SFB-RWQCB related to the UST. The current facility at 850 Drake Avenue (existing fire department and sheriff office) is permitted by the MCWM to storage approximately 1600 gallons of petroleum product in AST's (Permit #60-0277).

2) 620 Drake Avenue, Marin City, former Manzanita School – a 1000 gallon underground storage tank (UST) had been permitted by the MCWM (Facility ID058573), and was removed on April 25, 1996 due to a delivery line leak test failure. The UST removal was completed under the supervision and April 6, 1996 permit of the MCWM, and completed by Tank Protect Engineering. Soil samples were collected from beneath the former UST at the time of removal. No investigation was pursued by the MCWM nor the SFB-RWQCB related to the UST.

5.3 Tribal Records

The US EPA's AAI rule (40 CFR Part 312 Section 312.26, Reviews of federal, state, tribal, and local government records) includes a provision to review tribal records if they exist for a site. Our subcontracted record search company's (EDR) report (attached to this report) indicated no properties under their tribal database review and located within 0.25 miles of the subject site

that had a previous UST, but underwent VCP (voluntary cleanup procedures). We discovered no additional information indicating that there would be tribal records available for this site.

5.4 Physical Setting

5.4.1 Regional Physiographic Conditions

Surface topography slopes upward to the northwest from an elevation of 48 feet above mean sea level (MSL) in the southeast corner of the property, to 88 feet above MSL in the northwest portion of the property. The property is located in a residential area, with a nearby fire department and sheriff substation (850 Drake Avenue), and school (620 Drake Avenue), as well as a newly constructed city park located adjacent to the south of the subject site. The site is located on the north side of the Marin City basin, approximately 1500 feet west of US Highway 101 (Plate 1, Site Location map, Appendix A). The nearest primary surface water body to the site is Richardson Bay (which connects with the San Francisco Bay to the south), approximately 1800 feet east of the site.

5.4.2 Soil Conditions

Based on our review of the attached EDR Report dated February 5, 2020, Physical Setting Source Summary, soils underlying the subject site vicinity may be composed of the Saurin series (clay loam), Xerorthents series (clay loam), Tamalpais series (well drained very gravelly loam) and the Tocaloma series (well drained loam) according to the United States Department of Agriculture (USDA) Soil Conservation Service (SCS). Refer also to the Physical Setting Source Summary in the attached EDR report for further soils explanation (Appendix C).

5.4.3 Geologic Conditions

Mapping by the USGS (USGS, 2000 Geologic Map of Parts of Marin, San Francisco, Alameda, Contra Costa, and Sonoma Counties, California by Blake, M.C. Jr., Graynor, R.W, and Jones, D.L.) indicates the area underlying the subject site is composed of mélange materials of the Franciscan Complex. Refer also to the Physical Setting Source Summary in the attached EDR report (Appendix C).

5.4.4 Groundwater Conditions

Shallow groundwater in the valley area down slope from the site is fairly shallow, with a number of underlying deeper groundwater aquifers. There were limited wells listed on the Physical Settings Source Map included in the attached EDR report dated February 5, 2020. We did not

observe a water supply well on the subject property during our February 15, 2020 site inspection.

5.5 Results of Site History and Land Use Review

5.5.1 Sanborn Fire Insurance Maps

There is no Sanborn coverage for this property as indicated by EDR (Appendix G).

5.5.2 City Directory

The subject property is located along Drake Avenue approximately 1500 feet west of US Highway 101, California (Plate 1, Appendix A). The City Directory confirms predominantly residential with mixed public land use in the vicinity of the subject property.

5.5.3 City Records Review

The EDR City Directory Abstract is included as part of this Phase I ESA as Appendix F, and predominantly lists residences nearby the subject site. Village Baptist Church is listed in the City Directory dating back to 1975.

5.5.4 Aerial Photographs

Aerial photographs provided from Environmental Data Resources, Inc. (EDR) were reviewed for this Phase I ESA. The results of the historical aerial photo review (Appendix D) are as follows:

> EDR, 2016, Color, non stereo frame, scale 1" = 500': Site and surrounding area development similar to that of the 2010 aerial.
>
> EDR, 2012, Color, non stereo frame, scale 1" = 500': Site and surrounding area development similar to that of the 2009 aerial.
>
> EDR, 2009, Color, non stereo frame, scale 1" = 500': Site and surrounding area development similar to that of the 2005 aerial. Property adjacent to the southeast of the subject site is undergoing redevelopment.
>
> EDR, 2005, Color, non stereo frame, scale 1" = 500': Site and surrounding area development similar to that of the present day. Original church structure now removed and replaced with triple wide building.

EDR, 1993, B&W, non stereo frame, scale 1"= 500': Site similar to 1984 aerial photo. Senior project adjacent north of the site now present.

EDR, 1983, Color, non stereo frame, 1"= 500': Site similar to 1974 aerial photo, with increased development to the northwest of the subject site.

EDR, 1974, Color copy, non stereo frame, scale 1"= 500': Site and surrounding area similar to 1968 aerial photo.

EDR, 1968, B&W copy, non stereo frame, scale 1"= 500': Site developed with church facility building at the time of this photo. Surrounding area development is less, with homes having been removed to the northwest and southeast of the subject site. Apartment complex to the west is now constructed.

EDR, 1963, B&W copy, non stereo frame, scale 1"= 500': Site developed with church facility building at the time of this photo. Surrounding area development is less, with homes having been removed to the north and northwest.

EDR, 1958, B&W copy, non stereo frame, scale 1"= 500': Site and surrounding area similar to 1952 aerial photo.

EDR, 1952, B&W copy, non stereo frame, scale 1"= 500': Site and surrounding area similar to 1942 aerial photo.

EDR, 1946, B&W copy, non stereo frame, scale 1"= 500': Site and surrounding area developed with housing likely constructed by Marinship Corporation. At least four (4) residential structures are present on the site.

5.5.5 Personal Interviews

Information was obtained for this Phase I ESA through consultations with one or more of each of the following: the Client and Client's representative(s), regulatory agency personnel, City or County personnel, current site Owner's representative, and others with relevant knowledge of the property. Those interviewed and their relationship to the property is as follows:

Ms. Kimberly Calica:		AMG & Associates, Inc., Client (Buyer)
Dr. Emmanuel Akognon:	(707) 762-6125	Village Baptist Church, Owner
Ms. Erin Denigan:	(707) 792-2279	Owner's Broker

Ms. Kim Richardson:	(415) 332-2100	Village Oduduwa, Manager
Mr. Alex Behrouz:	(415) 332-1441	Marin City Community Services
Ms. Mary Kennelly:	(415) 473-6647	Marin County Waste Management
Mr. Yan Nusinovich:	(510) 622-2300	SFB-RWQCB
Counter Personnel:	(415) 473-6269	Marin County Community Development

Information from these sources is included in various sections of this Phase I ESA report, and reference is made to the source of information where obtained through consultation with individuals.

5.5.6 Synopsis of Previous and Current Environmental Investigations

In 1965, the Village Baptist Church constructed a new facility on the property in the southeastern portion. This structure was the primary church facility on the property until a fire destroyed the church in October 1999. The church retained a licensed contractor who encapsulated the burned structure, and removed approximately 88.49 tons of asbestos containing material (ACM). The ACM was loaded, hauled and disposed of under permit ID S112915955 and EPA ID CAC002365527. Following removal of the ACM, the church retained a licensed contractor to demolish the former church facility under permit with the Marin County Community Development Agency. The former building pad of the church is evident in the eastern portion of the property. EGS did not identify other environmental investigations related to the subject site.

Based on our review of the regulatory agencies (Marin County Department of Public Works, Office of Waste Management (Local CUPA Agency), Marin County Community Development Agency, Marin City Community Services District, and San Francisco Bay Regional Water Quality Control Board (SFB-RWQCB), as well as the attached historical database information (Appendices C through G), there were no active or historical environmental investigations documented at the subject site.

As part of our records review EGS researched the California State Geotracker Database and Department of Toxic Substances Control (DTSC) Envirostor Database to identify current or historic environmental concerns at or near the subject site, with no investigations reported on the subject site. Only one site is listed on the Geotracker Database within 1000 feet of the subject property as follows:

1) Apollo Cleaners, located at 160 Donahue Street, approximately 800 feet southeast of the site, Geotracker Global IDSL0604181210, environmental investigation related to a release of solvents used in dry cleaning facilities (PCE), case closed July 16, 2007.

EGS also reviewed the attached subcontracted database search provided by Environmental Data Resources (EDR) and identified two additional sites within 1000 feet of the subject site that had underground storage tanks containing petroleum products. EGS inquired with the local CUPA agency (Marin County Office of Waste Management, MCWM), and discovered the following:

1) 850 Drake Avenue, Marin City, Fire Department facility – a 1000 gallon underground storage tank (UST) had been permitted by the MCWM, and was removed on August 21, 1998 due to proposed replacement of the UST with aboveground storage tanks (AST's). The UST removal was completed under the supervision and August 14, 1998 permit of the MCWM, and completed by MCL Underground Tank Testing. Soil samples were collected from beneath the former UST at the time of removal. No investigation was pursued by the MCWM nor the SFB-RWQCB related to the UST. The current facility at 850 Drake Avenue (existing fire department and sheriff office) is permitted by the MCWM to storage approximately 1600 gallons of petroleum product in AST's (Permit #60-0277).

2) 620 Drake Avenue, Marin City, former Manzanita School – a 1000 gallon underground storage tank (UST) had been permitted by the MCWM (Facility ID058573), and was removed on April 25, 1996 due to a delivery line leak test failure. The UST removal was completed under the supervision and April 6, 1996 permit of the MCWM, and completed by Tank Protect Engineering. Soil samples were collected from beneath the former UST at the time of removal. No investigation was pursued by the MCWM nor the SFB-RWQCB related to the UST.

5.5.7 Summary of Land Use

The property consists of Marin County APN 052-112-03, which totals approximately 1.01+/- acres (Plate 3, AP Map, Appendix A). The subject property is currently developed with a triple wide manufactured home, with associated walkways, handicap accessible ramps, a small storage shed, and asphaltic driveway and parking lot. The subject site is owned by the Village Baptist Church, and has been used as the church's primary location until the end of July 2015 when the church relocated its facility to Petaluma, CA.

6.0 SITE RECONNAISSANCE

6.1 Methodology and Limiting Conditions

We conducted the site reconnaissance on February 15, 2020. The site reconnaissance was conducted by EGS's Environmental Professional, to become familiar with the site, adjacent properties, and nearby conditions. The site and surrounding structures and features were observed to document the current conditions and surrounding land use, as well as obtaining information, if any, indicating the likelihood of identifying recognized environmental conditions in connection with the property.

The site reconnaissance methodology consisted of walking over the site, taking field notes, and photographing visibly observable conditions. Selected photographs are attached to this Phase I ESA as Appendix B. No samples of any materials were collected, nor were any tests conducted. Our site reconnaissance was limited to observing readily visible conditions. We did not conduct any sampling, exploration, digging, drilling, probing or excavation. Existing materials were not moved.

The subject property was observed to document current conditions of land use and to observe potential visibly identifiable conditions that indicate an existing release, a past release, or a material threat of a release of any hazardous substances or petroleum products at the subject property and adjacent properties. Observations made by our Environmental Professional are reported in various sections of this Phase I ESA.

6.2 General Site Setting

Surface topography slopes upward to the northwest from an elevation of 48 feet above mean sea level (MSL) in the southeast corner of the property, to 88 feet above MSL in the northwest portion of the property. The property is located in a residential area, with a nearby fire department and sheriff substation (850 Drake Avenue), and school (620 Drake Avenue), as well as a newly constructed city park located adjacent to the south of the subject site.

The site is located on the north side of the Marin City basin, approximately 1500 feet west of US Highway 101 (Plate 1, Site Location map, Appendix A). The nearest primary surface water body to the site is Richardson Bay (which connects with the San Francisco Bay to the south), approximately 1800 feet east of the site.

6.2.1 Current Use of Subject Property

The property consists of Marin County APN 052-112-03, which totals approximately 1.01+/- acres (Plate 3, AP Map, Appendix A). The subject property is currently developed with a triple wide manufactured home, with associated walkways, handicap accessible ramps, a small storage shed, and asphaltic driveway and parking lot. The subject site is owned by the Village Baptist Church, and has been used as the church's primary location until the end of July 2015 when the church relocated its facility to Petaluma, CA.

6.2.2 Adjacent Off-Site and Vicinity Observations

Surrounding area development consists of residential and public use buildings and facilities as follows:

North of site – Residential

East of site – Residential

South of site – Mixed use residential, a newly constructed public park (George "Rocky" Graham Park), and a Sheriff and Fire Department Building at 850 Drake Avenue

West of site – Mixed use residential and a recreation center

6.3 Exterior Observations

Based on our site observations, exterior conditions of the triple wide building appear to be in fair repair.

6.4 Interior Observations

Based on our site observations, interior conditions appear to be fair.

7.0 INTERVIEWS

7.1 Interviews with Owner and Others

A list of those interviewed is provided in a previous report section (5.5.5). Information provided by the Client, and Client's representatives, is cited in relevant sections of this report. These interviews provided information on the site history, uses, and ownership.

Ms. Kimberly Calica, AMG & Associates, Inc. provided EGS with relative site information including the Preliminary Title Report, proposed development concepts, and other site information, and provided contact information to coordinate the site visit.

7.2 Interview with Occupant of Subject Property

Dr. Emmanuel Akognon provided EGS with the site history of the Village Baptist Church, and verified information related to the fire, ACM cleanup and building demolition.

7.3 Interviews with Local Officials

We spoke with personnel (listed in Section 5.5.5) at the Marin County Department of Public Works, Office of Waste Management (Local CUPA Agency), Marin County Community Development Agency, Marin City Community Services District, and San Francisco Bay Regional Water Quality Control Board (SFB-RWQCB) to determine if records exist at or near the subject site related to environmental hazardous investigations. There were no files related to soils, releases, investigations or cleanups related to the subject site, and therefore no file reviews were performed at these offices.

We also reviewed online databases including the State Geotracker Database and the DTSC EnviroStor database.

8.0 FINDINGS

Pursuant to the request and assignment of the Ms. Kimberly Calica, AMG & Associates, Inc., P.O. Box 260770, Encino, CA 91426 (Client), Environmental Geology Services (Consultant), performed a Phase I Environmental Site Assessment (ESA) on the referenced property located at 825 Drake Avenue, Marin City, Marin County, State of California (Plate 1, Site Location Map, Appendix A).

The Client requested this Phase I Environmental Site Assessment (ESA) as part of their due diligence prior to purchasing the property for a multi-family residential redevelopment project.

Our Assessment resulted in the following findings:

- Environmental Geology Services (EGS) and its' Environmental Professionals researched the site history and historical records to identify past and present land uses as part of due diligence to determine if Recognized Environmental Conditions (REC's), Historical REC's (HREC's), Controlled REC's (CREC's), or Vapor Encroachment Conditions (VEC's) may exist, or may have existed on the property.

- Our research attempted to identify these conditions as they may relate to hazardous substances or petroleum products released to, or that may have migrated in or through, the environment (soil, soil vapor, and groundwater). EGS also determined if *de minimis* conditions or other environmental considerations exist at the site.

- The property consists of Marin County APN 052-112-03, which totals approximately 1.01+/- acres.

- The subject property is currently developed with a triple wide manufactured home, with associated walkways, handicap accessible ramps, a small storage shed, and asphaltic driveway and parking lot.

- The subject site is owned by the Village Baptist Church, and has been used as the church's primary location from approximately 1958 through the end of July 2015 when the church relocated its facility to Petaluma, CA.

- Surface topography slopes upward to the northwest from an elevation of 48 feet above mean sea level (MSL) in the southeast corner of the property, to 88 feet above MSL in the northwest portion of the property.

- The property is located in a residential area, with a nearby fire department and sheriff substation (850 Drake Avenue), and school/recreation center (620 Drake Avenue), as well as a newly constructed city park located adjacent to the south of the subject site.

- The site is located on the north side of the Marin City basin, approximately 1500 feet west of US Highway 101.

- The nearest primary surface water body to the site is Richardson Bay (which connects with the San Francisco Bay to the south), approximately 1800 feet east of the site.

- The area of Marin City, CA was initially developed during World War II, when Marinship Corporation had a shipyard nearby along Richardson Bay.

- The area of the subject site was developed with single family homes for the shipyard workers, including at least six (6) homes on the subject site. An original driveway is still present along Park Circle, west of the existing triple wide structure.

- It is our understanding that the Village Baptist Church originally began in approximately 1958 possibly using four of these former homes.

- In 1965, the Village Baptist Church constructed a new facility on the property in the southeastern portion.

- This structure was the primary church facility on the property until a fire destroyed the church in October 1999.

- The church retained a licensed contractor who encapsulated the burned structure, and removed approximately 88.49 tons of asbestos containing material (ACM). The ACM was loaded, hauled and disposed of under permit ID S112915955 and EPA ID CAC002365527.

- Following removal of the ACM, the church retained a licensed contractor to demolish the former church facility under permit with the Marin County Community Development Agency.

- The former building pad of the church is evident in the eastern portion of the property.

- The Village Baptist Church then temporarily replaced their original church with the existing triple wide facility, and used the temporary facility until their recent move to Petaluma, CA.

- During the mid-1980's, the Village Baptist Church split the original property into two lots, and developed a 25-unit senior housing complex, The Village Oduduwa, located adjacent to the north of the subject site.

- Surrounding area development consists of residential and public use buildings and facilities as follows:

  North of site – Residential

  East of site – Residential

  South of site – Mixed use residential, a newly constructed public park (George "Rocky" Graham Park), and a Sheriff and Fire Department Building at 850 Drake Avenue

  West of site – Mixed use residential and a recreation center

- Based on our review of the regulatory agencies (Marin County Department of Public Works, Office of Waste Management (Local CUPA Agency), Marin County Community Development Agency, Marin City Community Services District, and San Francisco Bay Regional Water Quality Control Board (SFB-RWQCB), as well as the attached historical database information (Appendices C through G), there were no active or historical environmental investigations documented at the subject site.

- As part of our records review EGS researched the California State Geotracker Database and Department of Toxic Substances Control (DTSC) Envirostor Database to identify current or historic environmental concerns at or near the subject site, with no investigations reported on the subject site. Only one site is listed on the Geotracker Database within 1000 feet of the subject property as follows:

  1) Apollo Cleaners, located at 160 Donahue Street, approximately 800 feet southeast of the site, Geotracker Global IDSL0604181210, environmental investigation related to a release of solvents used in dry cleaning facilities (PCE), case closed July 16, 2007.

- EGS also reviewed the attached subcontracted database search provided by Environmental Data Resources (EDR) and identified two additional sites within 1000 feet of the subject site that had underground storage tanks containing petroleum products. EGS inquired with the local CUPA agency (Marin County Office of Waste Management, MCWM), and discovered the following:

1) 850 Drake Avenue, Marin City, Fire Department facility – a 1000 gallon underground storage tank (UST) had been permitted by the MCWM, and was removed on August 21, 1998 due to proposed replacement of the UST with aboveground storage tanks (AST's). The UST removal was completed under the supervision and August 14, 1998 permit of the MCWM, and completed by MCL Underground Tank Testing. Soil samples were collected from beneath the former UST at the time of removal. No investigation was pursued by the MCWM nor the SFB-RWQCB related to the UST. The current facility at 850 Drake Avenue (existing fire department and sheriff office) is permitted by the MCWM to storage approximately 1600 gallons of petroleum product in AST's (Permit #60-0277).

2) 620 Drake Avenue, Marin City, former Manzanita School – a 1000 gallon underground storage tank (UST) had been permitted by the MCWM (Facility ID058573), and was removed on April 25, 1996 due to a delivery line leak test failure. The UST removal was completed under the supervision and April 6, 1996 permit of the MCWM, and completed by Tank Protect Engineering. Soil samples were collected from beneath the former UST at the time of removal. No investigation was pursued by the MCWM nor the SFB-RWQCB related to the UST.

9.0 CONCLUSIONS

Based on our site research, file reviews, site reconnaissance, and in accordance with the US EPA's All Appropriate Inquiries (AAI) and ASTM E1527-13 Standard of Practice, Environmental Geology Services provides the following conclusions:

Recognized Environmental Conditions (REC): There were no REC's observed on or nearby the subject property;

Historical REC's (HREC's): There were no HREC's observed on or nearby the subject property;

Controlled REC's (CREC's): There were no CREC's observed on or nearby the subject property;

Vapor Encroachment Conditions (VEC's): There were no VEC's observed on or nearby the subject property;

***De minimus* Conditions**: We did not observe conditions that would be considered *de minimus*.

Other Environmental Considerations: EGS provides no additional environmental considerations for the subject site.

The terms Recognized Environmental Conditions (REC), Historical REC's (HREC's), Controlled REC's (CREC's), migrate/migration (related to VEC's), and *de minimis* conditions are defined, pursuant to the ASTM E1527-13 Standard of Practice, in section 2.1.1 of this report, along with other pertinent definitions.

Finally, EGS has concluded that under the US EPA's All Appropriate Inquiry rule and the ASTM E1527-13 Standard of Practice (discussed further in Section 2.1 of this report), there were no current conditions observed at this site, and adjacent sites, at the time of our site reconnaissance that were indicative of an existing release, a past release or a material threat of a release of hazardous substances including petroleum products to soil, soil, vapor, or groundwater at the site.

10.0 RECOMMENDATIONS

It is recommended that the reader review all Appendices included in this Phase I Environmental Site Assessment (Appendices A - H). This assessment is intended to permit the Client to satisfy one of the requirements to qualify for the innocent landowner defense for CERCLA liability.

Our Phase 1 ESA identified no Recognized Environmental Conditions (REC) at this property. Nevertheless, we recommend that the Client consult with an attorney to fully cover legal questions and to determine additional requirements needed to qualify for the innocent landowner defense for CERCLA liability, should the need for such a defense arise, or be of concern to the Client.

Based on the above conclusions, Environmental Geology Services makes the following recommendations for the site:

- ❖ We have no recommendations as a result of this Phase 1 ESA for this site.

11.0 PROOF OF QUALIFICATIONS

This section presents the qualifications and background of the person or persons preparing the Phase I ESA. The following summary is provided to comply with the ASTM Practice E1527-13 requirement and the US EPA's AAI Rule so that minimum requirements are met.

We declare to the best of our professional knowledge and belief, we meet the definition of Environmental Professional (EP) as defined in Section 2.1.1 of this Phase I ESA Report and in 312.10 of 40 CFR 312. We have the specific qualifications passed on education, training, and experience to assess the nature, history, and setting of the subject property. We have developed and performed the all appropriate inquiries in conformance with the standards and practices set forth in 40 CFR part 312, and ASTM E1527-13. The Environmental Professionals who conducted this Phase I ESA are presented in the following:

David L. Bush, Professional Geologist (PG 8989)

Education: - The Florida State University, Tallahassee, FL: B.S. - Geography/Environmental Studies, 1999. Sonoma State University, Rohnert Park, CA: B.A. Geology, 2007.

CERTIFICATION	DATE EARNED	METHOD1	REGISTRATION #	STATES
Professional Geologist	2012, 2013 – PG	EX, R	8989, G2390, 1396	CA, OR, WI
Registered Environmental Assessor, Level I	2007 - REA I	EA	08276	CA
Qualified SWPPP Developer	2013 - QSD	EX	24661	CA

NOTE 1: EX = by Examination, Education and Experience; EA = Experience and Application

Hazmat Training: - Fed-OSHA (Title 29, CFR 1910.120) Hazardous Waste Operations and Emergency Response 24-Hour Training, National Environmental Trainers, Inc., 2002; Fed-OSHA (Title 29, CFR 1910.120) and Cal OSHA (Title 8 CCR 5192(e)(3)(A)) Health and Safety Training for Hazardous Waste Workers 40-Hour Training, University of California - Davis, 2007.

Professional History: Owner and Principal Geologist of Environmental Geology Services. Previous experience includes 15 years experience at Environmental Geology Services as Senior Project Geologist / Manager. Prior work with the US-National Resource Conservation Service and the State of California Parks & Recreation Department.

Fields of Expertise: Project Management, UST Fund Claims Processing and Management, State Geotracker System management and information support. Environmental geology research and investigation for Phase 1 and Phase 2 environmental site assessments including chlorinated solvent sites, UST investigations/ remediation/ closure, soil and groundwater investigations and sampling using solid, hollow stem, mud and air rotary drilling methods as well as direct push techniques and CPT, monitoring well design, installation and development, contamination research and investigation, surface water sampling, groundwater resource evaluations, site remediation planning, lithologic logging test pits and trenches for geotechnical exploration and active fault investigations environmental/geologic field work, environmental report writing and work plan development, and analytical results analysis and interpretation.

Clients: Cities, municipal agencies, banks, commercial developers and property managers, wineries, architects, engineers, insurance companies, legal firms, land planners, and environmental impact report consultants.

Professional Affiliations: Association of Groundwater Scientists and Engineers, Association of Engineering Geologists, National Groundwater Association, American Association of Petroleum Geologists.

12.0 REFERENCES

American Society for Testing and Materials (ASTM), Designation E1527-13, Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process, November 2013.

Comprehensive Environmental Response, Compensation, and Liability Act of 1980 ("CERCLA" or "Superfund), as amended by Superfund Amendments and Reauthorization Act of 1986 ("SARA") and Small Business Liability Relief and Brownfields Revitalization Act of 2002 ("Brownfields Amendments"), 42 U.S.C §9601 *et seq.*

"All Appropriate Inquiries" Final Rule 40 C.F.R. Part 312 Chapter 1 EPA, Subchapter J-Superfund, Emergency Planning, and Community Right-to-Know Programs, 40 C.F.R Parts 300-399.

Environmental Data Resources, Inc., Radius Map with GeoCheck, Inquiry Number 5960977.2s, February 5, 2020

Environmental Data Resources, Inc., Aerial Photo Decade Package, Inquiry Number 5960977.9, February 5, 2020

Environmental Data Resources, Inc., Historical Topographic Map Report, Inquiry Number 5960977.4, February 5, 2020

Environmental Data Resources, Inc., City Directory Abstract, Inquiry Number 5960977.5, February 7, 2020

Environmental Data Resources, Inc., Certified Sanborn® Map Report, Inquiry Number 5960977.3, February 5, 2020

California Department of Toxic Substances, California EPA Website at www.envirostor.dtsc.ca.gov/public/

California Department of Water Resources, Division of Planning and Local Assistance Website at http://well.water.ca.gov/

California State Water Resources Control Board, Water Quality, Geographic Information System (GIS) at http://www.geotacker.swrcb.ca.gov

California Department of Conservation, Division of Mines and Geology Website at http://www.consrv.ca.gov/CGS/information/publications/cgs_notes/note_36/note_36.pdf

U. S. Environmental Protection Agency, Brownfields Cleanup and Redevelopment, All Appropriate Inquiries at http://www.epa.gov/

APPENDIX F

SITE PHOTOGRAPHS

VILLAGE BAPTIST CHURCH

APPENDIX G

VAPOR ENCROACHMENT SCREEN

Commercial Property
825 Drake Avenue
Sausalito, CA 94965

Inquiry Number: 7216358.2s
January 23, 2023

EDR Vapor Encroachment Screen

Prepared using EDR's Vapor Encroachment Worksheet

EDR® Environmental Data Resources Inc

6 Armstrong Road, 4th floor
Shelton, CT 06484
Toll Free: 800.352.0050
www.edrnet.com

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Thank you for your business.
Please contact EDR at 1-800-352-0050
with any questions or comments.

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The EDR Vapor Encroachment Worksheet enables EDR's customers to make certain online modifications that effects maps, text and calculations contained in this Report. As a result, maps, text and calculations contained in this Report may have been so modified. EDR has not taken any action to verify any such modifications, and this report and the findings set forth herein must be read in light of this fact. Environmental Data Resources shall not be responsible for any customer's decision to include or not include in any final report any records determined to be within the relevant minimum search distances.

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EXECUTIVE SUMMARY

A search of available environmental records was conducted by EDR. The report was designed to assist parties seeking to meet the search requirements of the ASTM Standard Practice for Assessment of Vapor Encroachment into Structures on Property Involved in Real Estate Transactions (E 2600).

STANDARD ENVIRONMENTAL RECORDS	Default Area of Concern (Miles)*	property	1/10	> 1/10
Lists of Federal NPL (Superfund) sites	1.0	0	0	0
Lists of Federal Delisted NPL sites	1.0	0	0	0
Lists of Federal sites subject to CERCLA removals and CERCLA orders	0.5	0	0	0
Lists of Federal CERCLA sites with NFRAP	0.5	0	0	0
Lists of Federal RCRA facilities undergoing Corrective Action	1.0	0	0	0
Lists of Federal RCRA TSD facilities	0.5	0	0	0
Lists of Federal RCRA generators	0.25	0	0	0
Federal institutional controls / engineering controls registries	0.5	0	0	0
Federal ERNS list	0.001	0	0	-
Lists of state- and tribal (Superfund) equivalent sites	1.0	0	0	0
Lists of state- and tribal hazardous waste facilities	1.0	0	0	0
Lists of state and tribal landfills and solid waste disposal facilities	0.5	0	0	0
Lists of state and tribal leaking storage tanks	0.5	0	0	0
Lists of state and tribal registered storage tanks	0.25	0	2	0
State and tribal institutional control / engineering control registries	not searched	-	-	-
Lists of state and tribal voluntary cleanup sites	0.5	0	0	0
Lists of state and tribal brownfield sites	0.5	0	0	0

ADDITIONAL ENVIRONMENTAL RECORDS				
Local Brownfield lists	0.5	0	0	0
Local Lists of Landfill / Solid Waste Disposal Sites	0.5	0	0	0
Local Lists of Hazardous waste / Contaminated Sites	1.0	0	0	0
Local Lists of Registered Storage Tanks	0.25	0	4	0
Local Land Records	0.5	0	0	0
Records of Emergency Release Reports	0.5	0	0	0
Other Ascertainable Records	1.0	0	4	0

EDR HIGH RISK HISTORICAL RECORDS				
EDR Exclusive Records	1.0	0	0	0
Exclusive Recovered Govt. Archives	0.001	0	0	-

EXECUTIVE SUMMARY

EDR RECOVERED GOVERNMENT ARCHIVES

EDR Exclusive Records	1.0	0	0	0
Exclusive Recovered Govt. Archives	0.001	0	0	-

*The Default Area of Concern may be adjusted by the environmental professional using experience and professional judgement. Each category may include several databases, and each database may have a different distance. A list of individual databases is provided at the back of this report.

EXECUTIVE SUMMARY

TARGET PROPERTY INFORMATION

ADDRESS

COMMERCIAL PROPERTY
825 DRAKE AVENUE
SAUSALITO, CA 94965

COORDINATES

Latitude (North):	37.874502 - 37° 52′ 28.200989″
Longitude (West):	122.513943 - 122° 30′ 50.20752″
Elevation:	56 ft. above sea level

TARGET PROPERTY SEARCH RESULTS

The target property was identified in the following records.

EXECUTIVE SUMMARY

SEARCH RESULTS

Unmappable (orphan) sites are not considered in the foregoing analysis.

STANDARD ENVIRONMENTAL RECORDS

Name	Address	Dist/Dir	Map ID	Page
MARIN COUNTY FIRE & SHERIFF UST: UST	850 DRAKE AVE.	<1/10 SE	◆ A2	11
COUNTY OF MARIN/MARIN CITY FIRE AST: AST	850 DRAKE AVENUE	<1/10 SE	◆ A3	13

ADDITIONAL ENVIRONMENTAL RECORDS

Name	Address	Dist/Dir	Map ID	Page
COUNTY OF MARIN/MARIN CITY FIRE CERS TANKS: CERS TANKS CERS: CERS	850 DRAKE AVENUE	<1/10 SE	◆ A1	8
MARIN CITY FIREHOUSE/SHERIFF S SWEEPS UST: SWEEPS UST	850 DRAKE AVE	<1/10 SE	◆ A4	14
MARIN CITY FIREHOUSE/SHERIFF S HIST UST: HIST UST	850 DRAKE AVE.	<1/10 SE	◆ A5	14
MARIN CITY FIREHOUSE/SHERIFF S HIST UST: HIST UST	850 DRAKE AVE	<1/10 SE	◆ A6	15
BETTY PRICE RCRA NonGen / NLR: RCRA NonGen / NLR	710 DRAKE AVENUE	<1/10 SSW	▲ B7	16
BETTY PRICE RCRA NonGen / NLR: RCRA NonGen / NLR	710 DRAKE AVE	<1/10 SSW	▲ B8	19
MARILYN HUTCHESON RCRA NonGen / NLR: RCRA NonGen / NLR	708 DRAKE AVENUE	<1/10 SSW	▲ B9	22

EDR HIGH RISK HISTORICAL RECORDS

Name	Address	Dist/Dir	Map ID	Page
Not Reported				

EDR RECOVERED GOVERNMENT ARCHIVES

Name	Address	Dist/Dir	Map ID	Page
Not Reported				

PRIMARY MAP - 7216358.2S

Target Property

Sites at elevations higher than or equal to the target property

Sites at elevations lower than the target property

Manufactured Gas Plants

National Priority List Sites

Dept. Defense Sites

0 300 1/3 Miles

Indian Reservations BIA

Special Flood Hazard Area (1%)

0.2% Annual Chance Flood Hazard

National Wetland Inventory

State Wetlands

Areas of Concern

This report includes Interactive Map Layers to display and/or hide map information. The legend includes only those icons for the default map view.

SITE NAME:	Commercial Property	CLIENT:	KCE Matrix
ADDRESS:	825 Drake Avenue Sausalito CA 94965	CONTACT:	Aram Kaloustian
		INQUIRY #:	7216358.2s
LAT/LONG:	37.874502 / 122.513943	DATE:	January 03, 2023 7:21 pm

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SECONDARY MAP - 7216358.2S

0 1/3 1/2 1 Miles

- Target Property
- Sites at elevations higher than or equal to the target property
- Sites at elevations lower than the target property
- Manufactured Gas Plants
- National Priority List Sites
- Dept. Defense Sites
- Indian Reservations BIA
- Power transmission lines
- Special Flood Hazard Area (1%)
- 0.2% Annual Chance Flood Hazard
- National Wetland Inventory
- State Wetlands
- Upgradient Area
- Areas of Concern

This report includes Interactive Map Layers to display and/or hide map information. The legend includes only those icons for the default map view.

SITE NAME: Commercial Property ADDRESS: 825 Drake Avenue Sausalito CA 94965 LAT/LONG: 37.874502 / 122.513943	CLIENT: KCE Matrix CONTACT: Aram Kaloustian INQUIRY #: 7216358.2s DATE: January 03, 2023 7:20 pm

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MAP FINDINGS

LEGEND

FACILITY NAME **FACILITY ADDRESS, CITY, ST, ZIP**		EDR SITE ID NUMBER
◆ **MAP ID#**	Direction Distance Range (Distance feet / miles) Relative Elevation Feet Above Sea Level	ASTM 2600 Record Sources found in this report. Each database searched has been assigned to one or more categories. For detailed information about categorization, see the section of the report Records Searched and Currency.

Worksheet:

Comments:
Comments may be added on the online Vapor Encroachment Worksheet.

DATABASE ACRONYM: Applicable categories (A hoverbox with database description).

COUNTY OF MARIN/MARIN CITY FIRE 850 DRAKE AVENUE, MARIN CITY, CA, 94965		S121752872
◆ A1	SE <1/10 (98 ft. / 0.018 mi.) 21 ft. Lower Elevation 35 ft. Above Sea Level	Local Lists of Registered Storage Tanks Other Ascertainable Records

Worksheet:

Impact on Target Property: Undetermined

CERS TANKS: Local Lists of Registered Storage Tanks

Name:	COUNTY OF MARIN/MARIN CITY FIRE
Address:	850 DRAKE AVENUE
City,State,Zip:	MARIN CITY, CA 94965
Site ID:	22078
CERS ID:	10032613
CERS Description:	Aboveground Petroleum Storage

CERS: Other Ascertainable Records

Name:	COUNTY OF MARIN/MARIN CITY FIRE
Address:	850 DRAKE AVENUE
City,State,Zip:	MARIN CITY, CA 94965
Site ID:	22078
CERS ID:	10032613
CERS Description:	Chemical Storage Facilities

Evaluation:

Eval General Type:	Compliance Evaluation Inspection
Eval Date:	06-16-2014
Violations Found:	No
Eval Type:	Routine done by local agency
Eval Notes:	Not Reported
Eval Division:	Marin County Dept of Public Works, Waste Mgmt, CUP

COUNTY OF MARIN/MARIN CITY FIRE, 850 DRAKE AVENUE, MARIN CITY, CA 94965 (Continued)

Eval Program:	HMRRP
Eval Source:	CERS,
Eval General Type:	Compliance Evaluation Inspection
Eval Date:	07-10-2017
Violations Found:	No
Eval Type:	Routine done by local agency
Eval Notes:	Not Reported
Eval Division:	Marin County Dept of Public Works, Waste Mgmt, CUP
Eval Program:	HMRRP
Eval Source:	CERS,
Eval General Type:	Compliance Evaluation Inspection
Eval Date:	06-16-2014
Violations Found:	No
Eval Type:	Routine done by local agency
Eval Notes:	Not Reported
Eval Division:	Marin County Dept of Public Works, Waste Mgmt, CUP
Eval Program:	APSA
Eval Source:	CERS,
Eval General Type:	Compliance Evaluation Inspection
Eval Date:	07-10-2017
Violations Found:	No
Eval Type:	Routine done by local agency
Eval Notes:	Not Reported
Eval Division:	Marin County Dept of Public Works, Waste Mgmt, CUP
Eval Program:	APSA
Eval Source:	CERS,
Eval General Type:	Compliance Evaluation Inspection
Eval Date:	12-09-2021
Violations Found:	No
Eval Type:	Routine done by local agency
Eval Notes:	Routine inspection. Patrick McNerney granted access
Eval Division:	Marin County Dept of Public Works, Waste Mgmt, CUP
Eval Program:	HMRRP
Eval Source:	CERS,

Affiliation:

Affiliation Type Desc:	Environmental Contact
Entity Name:	Patrick McNerney
Entity Title:	Not Reported
Affiliation Address:	P.O. BOX 4186
Affiliation City:	San Rafael
Affiliation State:	CA
Affiliation Country:	Not Reported
Affiliation Zip:	94903
Affiliation Phone:	,
Affiliation Type Desc:	Property Owner
Entity Name:	County of Marin

COUNTY OF MARIN/MARIN CITY FIRE, 850 DRAKE AVENUE, MARIN CITY, CA 94965 (Continued)

Entity Title:	Not Reported
Affiliation Address:	P.O. Box 4186
Affiliation City:	San Rafael
Affiliation State:	CA
Affiliation Country:	United States
Affiliation Zip:	94913
Affiliation Phone:	(415) 473-6576,
Affiliation Type Desc:	CUPA District
Entity Name:	Marin County CUPA
Entity Title:	Not Reported
Affiliation Address:	1600 Los GamosSuite 210
Affiliation City:	San Rafael
Affiliation State:	CA
Affiliation Country:	Not Reported
Affiliation Zip:	94903
Affiliation Phone:	(415) 473-6647,
Affiliation Type Desc:	Facility Mailing Address
Entity Name:	Mailing Address
Entity Title:	Not Reported
Affiliation Address:	P.O. Box 4186
Affiliation City:	San Rafael
Affiliation State:	CA
Affiliation Country:	Not Reported
Affiliation Zip:	94913
Affiliation Phone:	,
Affiliation Type Desc:	Legal Owner
Entity Name:	County of Marin
Entity Title:	Not Reported
Affiliation Address:	P.O. Box 4186
Affiliation City:	San Rafael
Affiliation State:	CA
Affiliation Country:	United States
Affiliation Zip:	94913
Affiliation Phone:	(415) 473-6576,
Affiliation Type Desc:	Operator
Entity Name:	County of Marin
Entity Title:	Not Reported
Affiliation Address:	Not Reported
Affiliation City:	Not Reported
Affiliation State:	Not Reported
Affiliation Country:	Not Reported
Affiliation Zip:	Not Reported
Affiliation Phone:	(415) 473-6577,
Affiliation Type Desc:	Document Preparer
Entity Name:	Patrick McNerney
Entity Title:	Not Reported
Affiliation Address:	Not Reported

COUNTY OF MARIN/MARIN CITY FIRE, 850 DRAKE AVENUE, MARIN CITY, CA 94965 (Continued)

Affiliation City:	Not Reported
Affiliation State:	Not Reported
Affiliation Country:	Not Reported
Affiliation Zip:	Not Reported
Affiliation Phone:	,
Affiliation Type Desc:	Identification Signer
Entity Name:	Patrick McNerney
Entity Title:	Environmental Compliance Specialist
Affiliation Address:	Not Reported
Affiliation City:	Not Reported
Affiliation State:	Not Reported
Affiliation Country:	Not Reported
Affiliation Zip:	Not Reported
Affiliation Phone:	,
Affiliation Type Desc:	Parent Corporation
Entity Name:	County of Marin
Entity Title:	Not Reported
Affiliation Address:	Not Reported
Affiliation City:	Not Reported
Affiliation State:	Not Reported
Affiliation Country:	Not Reported
Affiliation Zip:	Not Reported
Affiliation Phone:	,

MARIN COUNTY FIRE & SHERIFF 850 DRAKE AVE., MARIN CITY, CA, 94965		U003914632	
◆ A2	SE <1/10	(98 ft. / 0.018 mi.)	Lists of state and tribal registered storage tanks
	21 ft. Lower Elevation	35 ft. Above Sea Level	

Worksheet:

Impact on Target Property: Undetermined

MARIN CO. UST: Lists of state and tribal registered storage tanks

Name:	COUNTY OF MARIN/MARIN CITY FIRE
Address:	850 DRAKE AVENUE
City:	MARIN CITY
Zip:	Not Reported
Facility Id:	60-0277
Tank Number:	000001
Tank Status:	UST Removal
Tank Contents:	Premium unleaded
Tank Use:	Motor vehicle fueling
Certficate Number:	Not Reported
Last Inspected:	Not Reported
Program:	Not Reported
Location:	Not Reported

MARIN COUNTY FIRE & SHERIFF, 850 DRAKE AVE., MARIN CITY, CA 94965 (Continued)

Pulled Date:	Not Reported
Reason:	Not Reported
Tank Number:	000001
Tank Status:	UST Removal
Tank Contents:	Premium unleaded
Tank Use:	Motor vehicle fueling
Certficate Number:	Not Reported
Last Inspected:	Not Reported
Program:	Not Reported
Location:	Not Reported
Pulled Date:	Not Reported
Reason:	Not Reported
Tank Number:	Not Reported
Tank Status:	Not Reported
Tank Contents:	Not Reported
Tank Use:	Not Reported
Certficate Number:	Not Reported
Last Inspected:	Not Reported
Program:	UST
Location:	Closed Drawer
Pulled Date:	Not Reported
Reason:	Not Reported

UST:

Name:	MARIN COUNTY - MARIN CITY
Address:	850 DRAKE AVE.
City,State,Zip:	MARIN CITY, CA 94965
Facility ID:	600277
Permitting Agency:	MARIN COUNTY
CERSID:	Not Reported
Latitude:	37.875024
Longitude:	-122.5116597
Owner type:	Not Reported
Facility type:	Not Reported
Num of inuse ust:	Not Reported
Num of closed ust:	Not Reported
Num of oos ust:	Not Reported
Epa region:	Not Reported
Tribal lands:	Not Reported
Tank owner name:	Not Reported
Tank owner mailing address:	Not Reported
Tank owner mailing city:	Not Reported
Tank owner mailing zip:	Not Reported
Tank owner mailing state:	Not Reported
Tank operator name:	Not Reported
Tank operator mailing address:	Not Reported
Tank operator mailing city:	Not Reported

MARIN COUNTY FIRE & SHERIFF, 850 DRAKE AVE., MARIN CITY, CA 94965 (Continued)

Tank operator mailing zip:	Not Reported
Tank operator mailing state:	Not Reported
Tankidnumber:	Not Reported
Tank status:	Not Reported
Tank configuration:	Not Reported
Tank closure date:	Not Reported
Tank installation date:	Not Reported
Tank num of compartments:	Not Reported
Tank contents:	Not Reported
Tank capacity gallons:	Not Reported
Tank type:	Not Reported
Tank pc construction:	Not Reported
Tank pwpiping construction:	Not Reported
Tank piping type:	Not Reported
Tank piping construction:	Not Reported
Tank sacrificial anode:	Not Reported
Tank cp impressed current:	Not Reported
Tank cp shutoff:	Not Reported
Tank alarms:	Not Reported
Tank ball float:	Not Reported
Tank spill bucket:	Not Reported

COUNTY OF MARIN/MARIN CITY FIRE 850 DRAKE AVENUE, MARIN CITY, CA, 94965		A100419056	
◆ A3	SE <1/10	(98 ft. / 0.018 mi.)	Lists of state and tribal registered storage tanks
	21 ft. Lower Elevation	35 ft. Above Sea Level	

Worksheet:

Impact on Target Property: Undetermined

AST: Lists of state and tribal registered storage tanks

Name:	COUNTY OF MARIN/MARIN CITY FIRE
Address:	850 DRAKE AVENUE
City/Zip:	MARIN CITY,94965
Certified Unified Program Agencies:	Not Reported
Owner:	County of Marin
Total Gallons:	Not Reported
CERSID:	10032613
Facility ID:	21-000-600277
Business Name:	County of Marin
Phone:	415-473-6576
Fax:	415-473-3250
Mailing Address:	PO Box 4186
Mailing Address City:	San Rafael
Mailing Address State:	CA
Mailing Address Zip Code:	94913
Operator Name:	County of Marin
Operator Phone:	415-473-6577

COUNTY OF MARIN/MARIN CITY FIRE, 850 DRAKE AVENUE, MARIN CITY, CA 94965 (Continued)

Owner Phone:	415-473-6576
Owner Mail Address:	PO Box 4186
Owner State:	CA
Owner Zip Code:	94913
Owner Country:	United States
Property Owner Name:	Not Reported
Property Owner Phone:	Not Reported
Property Owner Mailing Address:	Not Reported
Property Owner City:	Not Reported
Property Owner Stat :	Not Reported
Property Owner Zip Code:	Not Reported
Property Owner Country:	Not Reported
EPAID:	Not Reported

MARIN CITY FIREHOUSE/SHERIFF S
850 DRAKE AVE, MARIN CITY, CA, 94965 S105086102

◆ A4	SE <1/10	(98 ft. / 0.018 mi.)	Local Lists of Registered Storage Tanks
	21 ft. Lower Elevation	35 ft. Above Sea Level	

Worksheet:

Impact on Target Property: Undetermined

SWEEPS UST: Local Lists of Registered Storage Tanks

Name:	MARIN CITY FIREHOUSE/SHERIFF S
Address:	850 DRAKE AVE
City:	MARIN CITY
Status:	Active
Comp Number:	36889
Number:	4
Board Of Equalization:	44-013876
Referral Date:	02-16-93
Action Date:	02-16-93
Created Date:	12-31-88
Owner Tank Id:	D 1.0 MCF
SWRCB Tank Id:	21-000-036889-000001
Tank Status:	A
Capacity:	1000
Active Date:	07-01-85
Tank Use:	M.V. FUEL
STG:	P
Content:	REG UNLEADED
Number Of Tanks:	1

MARIN CITY FIREHOUSE/SHERIFF S
850 DRAKE AVE., 850 DRAKE AVE., CA, 94965 U001600737

◆ A5	SE <1/10	(98 ft. / 0.018 mi.)	Local Lists of Registered Storage Tanks
	21 ft. Lower Elevation	35 ft. Above Sea Level	

Worksheet:

Impact on Target Property: Undetermined

HIST UST: Local Lists of Registered Storage Tanks

Name:	MARIN CITY FIREHOUSE/SHERIFF S
Address:	850 DRAKE AVE.
City,State,Zip:	850 DRAKE AVE., CA 94965
File Number:	Not Reported
URL:	Not Reported
Region:	STATE
Facility ID:	00000036889
Facility Type:	Other
Other Type:	FIRE DEPT.
Contact Name:	FIRE CAPTAIN
Telephone:	4153329120
Owner Name:	COUNTY OF MARIN
Owner Address:	CIVIC CENTER
Owner City,St,Zip:	SAN RAFAEL, CA 94903
Total Tanks:	0001
Tank Num:	001
Container Num:	D 1.0 MCF
Year Installed:	1969
Tank Capacity:	00001000
Tank Used for:	PRODUCT
Type of Fuel:	PREMIUM
Container Construction Thickness:	12
Leak Detection:	Stock Inventor

MARIN CITY FIREHOUSE/SHERIFF S
850 DRAKE AVE, NONE, CA, 94965 S112976382

◆ A6	SE <1/10	(98 ft. / 0.018 mi.)	Local Lists of Registered Storage Tanks
	21 ft. Lower Elevation	35 ft. Above Sea Level	

Worksheet:

Impact on Target Property: Undetermined

HIST UST: Local Lists of Registered Storage Tanks

Name:	MARIN CITY FIREHOUSE/SHERIFF S
Address:	850 DRAKE AVE
City,State,Zip:	NONE, CA 94965
File Number:	000291BE
URL:	http://geotracker.waterboards.ca.gov/ustpdfs/pdf/000291BE.pdf
Region:	Not Reported
Facility ID:	Not Reported

MARIN CITY FIREHOUSE/SHERIFF S, 850 DRAKE AVE, NONE, CA 94965 (Continued)

Facility Type:	Not Reported
Other Type:	Not Reported
Contact Name:	Not Reported
Telephone:	Not Reported
Owner Name:	Not Reported
Owner Address:	Not Reported
Owner City,St,Zip:	Not Reported
Total Tanks:	Not Reported
Tank Num:	Not Reported
Container Num:	Not Reported
Year Installed:	Not Reported
Tank Capacity:	Not Reported
Tank Used for:	Not Reported
Type of Fuel:	Not Reported
Container Construction Thickness:	Not Reported
Leak Detection:	Not Reported
Click here for Geo Tracker PDF:	http://www.web.edrnet.com/ordering/switchboard/redirect.aspx?s=GRR_CA_HISTUST_PDF&img_id=000291BE

BETTY PRICE 710 DRAKE AVENUE, SAUSALITO, CA, 94965			1026807433
▲ B7	SSW <1/10	(230 ft. / 0.044 mi.)	Other Ascertainable Records
	19 ft. Higher Elevation	75 ft. Above Sea Level	

Worksheet:

Impact on Target Property: Undetermined

RCRA Listings: Other Ascertainable Records

Date Form Received by Agency:	20210514
Handler Name:	BETTY PRICE
Handler Address:	710 DRAKE AVENUE
Handler City,State,Zip:	SAUSALITO, CA 94965
EPA ID:	CAC003119711
Contact Name:	BETTY PRICE
Contact Address:	710 DRAKE AVENUE
Contact City,State,Zip:	SAUSALITO, CA 94965
Contact Telephone:	415-331-9404
Contact Fax:	Not Reported
Contact Email:	NICOLE@ENV-REM.COM
Contact Title:	Not Reported
EPA Region:	09
Land Type:	Not Reported
Federal Waste Generator Description:	Not a generator, verified
Non-Notifier:	Not Reported
Biennial Report Cycle:	Not Reported
Accessibility:	Not Reported
Active Site Indicator:	Not Reported
State District Owner:	Not Reported

BETTY PRICE, 710 DRAKE AVENUE, SAUSALITO, CA 94965 (Continued)

State District:	Not Reported
Mailing Address:	710 DRAKE AVENUE
Mailing City,State,Zip:	SAUSALITO, CA 94965
Owner Name:	BETTY PRICE
Owner Type:	Other
Operator Name:	BETTY PRICE
Operator Type:	Other
Short-Term Generator Activity:	No
Importer Activity:	No
Mixed Waste Generator:	No
Transporter Activity:	No
Transfer Facility Activity:	No
Recycler Activity with Storage:	No
Small Quantity On-Site Burner Exemption:	No
Smelting Melting and Refining Furnace Exemption:	No
Underground Injection Control:	No
Off-Site Waste Receipt:	No
Universal Waste Indicator:	No
Universal Waste Destination Facility:	No
Federal Universal Waste:	No
Active Site Fed-Reg Treatment Storage and Disposal Facility:	Not Reported
Active Site Converter Treatment storage and Disposal Facility:	Not Reported
Active Site State-Reg Treatment Storage and Disposal Facility:	Not Reported
Active Site State-Reg Handler:	---
Federal Facility Indicator:	Not Reported
Hazardous Secondary Material Indicator:	N
Sub-Part K Indicator:	Not Reported
Commercial TSD Indicator:	No
Treatment Storage and Disposal Type:	Not Reported
2018 GPRA Permit Baseline:	Not on the Baseline
2018 GPRA Renewals Baseline:	Not on the Baseline
Permit Renewals Workload Universe:	Not Reported
Permit Workload Universe:	Not Reported
Permit Progress Universe:	Not Reported
Post-Closure Workload Universe:	Not Reported
Closure Workload Universe:	Not Reported
202 GPRA Corrective Action Baseline:	No
Corrective Action Workload Universe:	No
Subject to Corrective Action Universe:	No
Non-TSDFs Where RCRA CA has Been Imposed Universe:	No
TSDFs Potentially Subject to CA Under 3004 (u)/(v) Universe:	No
TSDFs Only Subject to CA under Discretionary Auth Universe:	No
Corrective Action Priority Ranking:	No NCAPS ranking

BETTY PRICE, 710 DRAKE AVENUE, SAUSALITO, CA 94965 (Continued)

Environmental Control Indicator:	No
Institutional Control Indicator:	No
Human Exposure Controls Indicator:	N/A
Groundwater Controls Indicator:	N/A
Operating TSDF Universe:	Not Reported
Full Enforcement Universe:	Not Reported
Significant Non-Complier Universe:	No
Unaddressed Significant Non-Complier Universe:	No
Addressed Significant Non-Complier Universe:	No
Significant Non-Complier With a Compliance Schedule Universe:	No
Financial Assurance Required:	Not Reported
Handler Date of Last Change:	20210514
Recognized Trader-Importer:	No
Recognized Trader-Exporter:	No
Importer of Spent Lead Acid Batteries:	No
Exporter of Spent Lead Acid Batteries:	No
Recycler Activity Without Storage:	No
Manifest Broker:	No
Sub-Part P Indicator:	No

Handler - Owner Operator:

Owner/Operator Indicator:	Owner
Owner/Operator Name:	BETTY PRICE
Legal Status:	Other
Date Became Current:	Not Reported
Date Ended Current:	Not Reported
Owner/Operator Address:	710 DRAKE AVENUE
Owner/Operator City,State,Zip:	SAUSALITO, CA 94965
Owner/Operator Telephone:	415-331-9404
Owner/Operator Telephone Ext:	Not Reported
Owner/Operator Fax:	Not Reported
Owner/Operator Email:	Not Reported

Owner/Operator Indicator:	Operator
Owner/Operator Name:	BETTY PRICE
Legal Status:	Other
Date Became Current:	Not Reported
Date Ended Current:	Not Reported
Owner/Operator Address:	710 DRAKE AVENUE
Owner/Operator City,State,Zip:	SAUSALITO, CA 94965
Owner/Operator Telephone:	415-331-9404
Owner/Operator Telephone Ext:	Not Reported
Owner/Operator Fax:	Not Reported
Owner/Operator Email:	Not Reported

Historic Generators:

BETTY PRICE, 710 DRAKE AVENUE, SAUSALITO, CA 94965 (Continued)

Receive Date:	20210514
Handler Name:	BETTY PRICE
Federal Waste Generator Description:	Not a generator, verified
State District Owner:	Not Reported
Large Quantity Handler of Universal Waste:	No
Recognized Trader Importer:	No
Recognized Trader Exporter:	No
Spent Lead Acid Battery Importer:	No
Spent Lead Acid Battery Exporter:	No
Current Record:	Yes
Non Storage Recycler Activity:	No
Electronic Manifest Broker:	No

List of NAICS Codes and Descriptions:

NAICS Code:	56299
NAICS Description:	ALL OTHER WASTE MANAGEMENT SERVICES

Facility Has Received Notices of Violations:

Violations:	No Violations Found

Evaluation Action Summary:

Evaluations:	No Evaluations Found

BETTY PRICE 710 DRAKE AVE, SAUSALITO, CA, 94965			1026052715
▲ B8	SSW <1/10	(230 ft. / 0.044 mi.)	Other Ascertainable Records
	19 ft. Higher Elevation	75 ft. Above Sea Level	

Worksheet:

Impact on Target Property: Undetermined

RCRA Listings: Other Ascertainable Records

Date Form Received by Agency:	20200311
Handler Name:	BETTY PRICE
Handler Address:	710 DRAKE AVE
Handler City,State,Zip:	SAUSALITO, CA 94965
EPA ID:	CAC003059611
Contact Name:	BETTY PRICE
Contact Address:	710 DRAKE AVE
Contact City,State,Zip:	SAUSALITO, CA 94965
Contact Telephone:	408-332-4413
Contact Fax:	Not Reported
Contact Email:	SHACARRAHENDERSON@ALLIANCE-ENVIRO.COM
Contact Title:	Not Reported
EPA Region:	09

BETTY PRICE, 710 DRAKE AVE, SAUSALITO, CA 94965 (Continued)

Land Type:	Not Reported
Federal Waste Generator Description:	Not a generator, verified
Non-Notifier:	Not Reported
Biennial Report Cycle:	Not Reported
Accessibility:	Not Reported
Active Site Indicator:	Not Reported
State District Owner:	Not Reported
State District:	Not Reported
Mailing Address:	710 DRAKE AVE
Mailing City,State,Zip:	SAUSALITO, CA 94965
Owner Name:	BETTY PRICE
Owner Type:	Other
Operator Name:	BETTY PRICE
Operator Type:	Other
Short-Term Generator Activity:	No
Importer Activity:	No
Mixed Waste Generator:	No
Transporter Activity:	No
Transfer Facility Activity:	No
Recycler Activity with Storage:	No
Small Quantity On-Site Burner Exemption:	No
Smelting Melting and Refining Furnace Exemption:	No
Underground Injection Control:	No
Off-Site Waste Receipt:	No
Universal Waste Indicator:	No
Universal Waste Destination Facility:	No
Federal Universal Waste:	No
Active Site Fed-Reg Treatment Storage and Disposal Facility:	Not Reported
Active Site Converter Treatment storage and Disposal Facility:	Not Reported
Active Site State-Reg Treatment Storage and Disposal Facility:	Not Reported
Active Site State-Reg Handler:	---
Federal Facility Indicator:	Not Reported
Hazardous Secondary Material Indicator:	N
Sub-Part K Indicator:	Not Reported
Commercial TSD Indicator:	No
Treatment Storage and Disposal Type:	Not Reported
2018 GPRA Permit Baseline:	Not on the Baseline
2018 GPRA Renewals Baseline:	Not on the Baseline
Permit Renewals Workload Universe:	Not Reported
Permit Workload Universe:	Not Reported
Permit Progress Universe:	Not Reported
Post-Closure Workload Universe:	Not Reported
Closure Workload Universe:	Not Reported
202 GPRA Corrective Action Baseline:	No
Corrective Action Workload Universe:	No

BETTY PRICE, 710 DRAKE AVE, SAUSALITO, CA 94965 (Continued)

Subject to Corrective Action Universe:	No
Non-TSDFs Where RCRA CA has Been Imposed Universe:	No
TSDFs Potentially Subject to CA Under 3004 (u)/(v) Universe:	No
TSDFs Only Subject to CA under Discretionary Auth Universe:	No
Corrective Action Priority Ranking:	No NCAPS ranking
Environmental Control Indicator:	No
Institutional Control Indicator:	No
Human Exposure Controls Indicator:	N/A
Groundwater Controls Indicator:	N/A
Operating TSDF Universe:	Not Reported
Full Enforcement Universe:	Not Reported
Significant Non-Complier Universe:	No
Unaddressed Significant Non-Complier Universe:	No
Addressed Significant Non-Complier Universe:	No
Significant Non-Complier With a Compliance Schedule Universe:	No
Financial Assurance Required:	Not Reported
Handler Date of Last Change:	20200313
Recognized Trader-Importer:	No
Recognized Trader-Exporter:	No
Importer of Spent Lead Acid Batteries:	No
Exporter of Spent Lead Acid Batteries:	No
Recycler Activity Without Storage:	No
Manifest Broker:	No
Sub-Part P Indicator:	No

Handler - Owner Operator:

Owner/Operator Indicator:	Owner
Owner/Operator Name:	BETTY PRICE
Legal Status:	Other
Date Became Current:	Not Reported
Date Ended Current:	Not Reported
Owner/Operator Address:	710 DRAKE AVE
Owner/Operator City,State,Zip:	SAUSALITO, CA 94965
Owner/Operator Telephone:	408-332-4413
Owner/Operator Telephone Ext:	Not Reported
Owner/Operator Fax:	Not Reported
Owner/Operator Email:	Not Reported

Owner/Operator Indicator:	Operator
Owner/Operator Name:	BETTY PRICE
Legal Status:	Other
Date Became Current:	Not Reported
Date Ended Current:	Not Reported
Owner/Operator Address:	710 DRAKE AVE
Owner/Operator City,State,Zip:	SAUSALITO, CA 94965

BETTY PRICE, 710 DRAKE AVE, SAUSALITO, CA 94965 (Continued)

Owner/Operator Telephone:	408-332-4413
Owner/Operator Telephone Ext:	Not Reported
Owner/Operator Fax:	Not Reported
Owner/Operator Email:	Not Reported

Historic Generators:

Receive Date:	20200311
Handler Name:	BETTY PRICE
Federal Waste Generator Description:	Not a generator, verified
State District Owner:	Not Reported
Large Quantity Handler of Universal Waste:	No
Recognized Trader Importer:	No
Recognized Trader Exporter:	No
Spent Lead Acid Battery Importer:	No
Spent Lead Acid Battery Exporter:	No
Current Record:	Yes
Non Storage Recycler Activity:	Not Reported
Electronic Manifest Broker:	Not Reported

List of NAICS Codes and Descriptions:

NAICS Code:	56299
NAICS Description:	ALL OTHER WASTE MANAGEMENT SERVICES

Facility Has Received Notices of Violations:

Violations:	No Violations Found

Evaluation Action Summary:

Evaluations:	No Evaluations Found

MARILYN HUTCHESON 708 DRAKE AVENUE, SAUSALITO, CA, 94965		1026714296
▲ B9	SSW <1/10 (237 ft. / 0.045 mi.) 19 ft. Higher Elevation 75 ft. Above Sea Level	Other Ascertainable Records

Worksheet:

Impact on Target Property: Undetermined

RCRA Listings: Other Ascertainable Records

Date Form Received by Agency:	20210126
Handler Name:	MARILYN HUTCHESON
Handler Address:	708 DRAKE AVENUE
Handler City,State,Zip:	SAUSALITO, CA 94965
EPA ID:	CAC003102650
Contact Name:	MARILYN HUTCHESON
Contact Address:	708 DRAKE AVENUE

MARILYN HUTCHESON, 708 DRAKE AVENUE, SAUSALITO, CA 94965 (Continued)

Contact City,State,Zip:	SAUSALITO, CA 94965
Contact Telephone:	707-548-0646
Contact Fax:	Not Reported
Contact Email:	MARIAE@PWSEI.COM
Contact Title:	Not Reported
EPA Region:	09
Land Type:	Not Reported
Federal Waste Generator Description:	Not a generator, verified
Non-Notifier:	Not Reported
Biennial Report Cycle:	Not Reported
Accessibility:	Not Reported
Active Site Indicator:	Not Reported
State District Owner:	Not Reported
State District:	Not Reported
Mailing Address:	708 DRAKE AVENUE
Mailing City,State,Zip:	SAUSALITO, CA 94965
Owner Name:	MARILYN HUTCHESON
Owner Type:	Other
Operator Name:	MARILYN HUTCHESON
Operator Type:	Other
Short-Term Generator Activity:	No
Importer Activity:	No
Mixed Waste Generator:	No
Transporter Activity:	No
Transfer Facility Activity:	No
Recycler Activity with Storage:	No
Small Quantity On-Site Burner Exemption:	No
Smelting Melting and Refining Furnace Exemption:	No
Underground Injection Control:	No
Off-Site Waste Receipt:	No
Universal Waste Indicator:	No
Universal Waste Destination Facility:	No
Federal Universal Waste:	No
Active Site Fed-Reg Treatment Storage and Disposal Facility:	Not Reported
Active Site Converter Treatment storage and Disposal Facility:	Not Reported
Active Site State-Reg Treatment Storage and Disposal Facility:	Not Reported
Active Site State-Reg Handler:	---
Federal Facility Indicator:	Not Reported
Hazardous Secondary Material Indicator:	N
Sub-Part K Indicator:	Not Reported
Commercial TSD Indicator:	No
Treatment Storage and Disposal Type:	Not Reported
2018 GPRA Permit Baseline:	Not on the Baseline
2018 GPRA Renewals Baseline:	Not on the Baseline
Permit Renewals Workload Universe:	Not Reported

MARILYN HUTCHESON, 708 DRAKE AVENUE, SAUSALITO, CA 94965 (Continued)

Permit Workload Universe:	Not Reported
Permit Progress Universe:	Not Reported
Post-Closure Workload Universe:	Not Reported
Closure Workload Universe:	Not Reported
202 GPRA Corrective Action Baseline:	No
Corrective Action Workload Universe:	No
Subject to Corrective Action Universe:	No
Non-TSDFs Where RCRA CA has Been Imposed Universe:	No
TSDFs Potentially Subject to CA Under 3004 (u)/(v) Universe:	No
TSDFs Only Subject to CA under Discretionary Auth Universe:	No
Corrective Action Priority Ranking:	No NCAPS ranking
Environmental Control Indicator:	No
Institutional Control Indicator:	No
Human Exposure Controls Indicator:	N/A
Groundwater Controls Indicator:	N/A
Operating TSDF Universe:	Not Reported
Full Enforcement Universe:	Not Reported
Significant Non-Complier Universe:	No
Unaddressed Significant Non-Complier Universe:	No
Addressed Significant Non-Complier Universe:	No
Significant Non-Complier With a Compliance Schedule Universe:	No
Financial Assurance Required:	Not Reported
Handler Date of Last Change:	20210226
Recognized Trader-Importer:	No
Recognized Trader-Exporter:	No
Importer of Spent Lead Acid Batteries:	No
Exporter of Spent Lead Acid Batteries:	No
Recycler Activity Without Storage:	No
Manifest Broker:	No
Sub-Part P Indicator:	No

Handler - Owner Operator:

Owner/Operator Indicator:	Owner
Owner/Operator Name:	MARILYN HUTCHESON
Legal Status:	Other
Date Became Current:	Not Reported
Date Ended Current:	Not Reported
Owner/Operator Address:	708 DRAKE AVENUE
Owner/Operator City,State,Zip:	SAUSALITO, CA 94965
Owner/Operator Telephone:	707-548-0646
Owner/Operator Telephone Ext:	Not Reported
Owner/Operator Fax:	Not Reported
Owner/Operator Email:	Not Reported

MARILYN HUTCHESON, 708 DRAKE AVENUE, SAUSALITO, CA 94965 (Continued)

Owner/Operator Indicator:	Operator
Owner/Operator Name:	MARILYN HUTCHESON
Legal Status:	Other
Date Became Current:	Not Reported
Date Ended Current:	Not Reported
Owner/Operator Address:	708 DRAKE AVENUE
Owner/Operator City,State,Zip:	SAUSALITO, CA 94965
Owner/Operator Telephone:	707-548-0646
Owner/Operator Telephone Ext:	Not Reported
Owner/Operator Fax:	Not Reported
Owner/Operator Email:	Not Reported

Historic Generators:

Receive Date:	20210126
Handler Name:	MARILYN HUTCHESON
Federal Waste Generator Description:	Not a generator, verified
State District Owner:	Not Reported
Large Quantity Handler of Universal Waste:	No
Recognized Trader Importer:	No
Recognized Trader Exporter:	No
Spent Lead Acid Battery Importer:	No
Spent Lead Acid Battery Exporter:	No
Current Record:	Yes
Non Storage Recycler Activity:	No
Electronic Manifest Broker:	No

List of NAICS Codes and Descriptions:

NAICS Code:	56299
NAICS Description:	ALL OTHER WASTE MANAGEMENT SERVICES

Facility Has Received Notices of Violations:

Violations:	No Violations Found

Evaluation Action Summary:

Evaluations:	No Evaluations Found

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

St	Acronym	Full Name	Government Agency	Gov Date	Arvl. Date	Active Date
ENVIRONMENTAL RECORDS						
Federal NPL site list						
US	NPL	National Priority List	EPA	10/27/2022	11/01/2022	11/15/2022
US	Proposed NPL	Proposed National Priority List Sites	EPA	10/27/2022	11/01/2022	11/15/2022
US	NPL LIENS	Federal Superfund Liens	EPA	10/15/1991	02/02/1994	03/30/1994
Federal CERCLIS list						
US	SEMS	Superfund Enterprise Management System	EPA	10/27/2022	11/01/2022	11/15/2022
Federal RCRA CORRACTS facilities list						
US	CORRACTS	Corrective Action Report	EPA	11/21/2022	11/21/2022	12/05/2022
Federal RCRA TSD facilities list						
US	RCRA-TSDF	RCRA - Treatment, Storage and Disposal	Environmental Protection Agency	11/21/2022	11/21/2022	12/05/2022
Federal RCRA generators list						
US	RCRA-LQG	RCRA - Large Quantity Generators	Environmental Protection Agency	11/21/2022	11/21/2022	12/05/2022
US	RCRA-SQG	RCRA - Small Quantity Generators	Environmental Protection Agency	11/21/2022	11/21/2022	12/05/2022
US	RCRA-VSQG	RCRA - Very Small Quantity Generators (Formerly Conditionall	Environmental Protection Agency	11/21/2022	11/21/2022	12/05/2022
Federal institutional controls / engineering controls registries						
US	LUCIS	Land Use Control Information System	Department of the Navy	08/16/2022	08/22/2022	10/24/2022
US	US ENG CONTROLS	Engineering Controls Sites List	Environmental Protection Agency	08/15/2022	08/17/2022	10/24/2022
US	US INST CONTROLS	Institutional Controls Sites List	Environmental Protection Agency	08/15/2022	08/17/2022	10/24/2022
Federal ERNS list						
US	ERNS	Emergency Response Notification System	National Response Center, United States Coast	12/12/2022	12/14/2022	12/19/2022
State and tribal - equivalent NPL						
CA	RESPONSE	State Response Sites	Department of Toxic Substances Control	07/25/2022	07/25/2022	10/05/2022
State and tribal - equivalent CERCLIS						
CA	ENVIROSTOR	EnviroStor Database	Department of Toxic Substances Control	07/25/2022	07/25/2022	10/05/2022
State and tribal landfill / solid waste disposal						
CA	SWF/LF (SWIS)	Solid Waste Information System	Department of Resources Recycling and Recover	08/08/2022	08/08/2022	10/20/2022
State and tribal leaking storage tank lists						
CA	LUST REG 9	Leaking Underground Storage Tank Report	California Regional Water Quality Control Boa	03/01/2001	04/23/2001	05/21/2001
CA	LUST	Leaking Underground Fuel Tank Report (GEOTRACKER)	State Water Resources Control Board	08/31/2022	08/31/2022	11/17/2022
CA	LUST REG 6L	Leaking Underground Storage Tank Case Listing	California Regional Water Quality Control Boa	09/09/2003	09/10/2003	10/07/2003
CA	LUST REG 8	Leaking Underground Storage Tanks	California Regional Water Quality Control Boa	02/14/2005	02/15/2005	03/28/2005
CA	LUST REG 7	Leaking Underground Storage Tank Case Listing	California Regional Water Quality Control Boa	02/26/2004	02/26/2004	03/24/2004
CA	LUST REG 5	Leaking Underground Storage Tank Database	California Regional Water Quality Control Boa	07/01/2008	07/22/2008	07/31/2008
CA	LUST REG 4	Underground Storage Tank Leak List	California Regional Water Quality Control Boa	09/07/2004	09/07/2004	10/12/2004

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

St	Acronym	Full Name	Government Agency	Gov Date	Arvl. Date	Active Date
CA	LUST REG 3	Leaking Underground Storage Tank Database	California Regional Water Quality Control Boa	05/19/2003	05/19/2003	06/02/2003
CA	LUST REG 2	Fuel Leak List	California Regional Water Quality Control Boa	09/30/2004	10/20/2004	11/19/2004
CA	LUST REG 1	Active Toxic Site Investigation	California Regional Water Quality Control Boa	02/01/2001	02/28/2001	03/29/2001
CA	LUST REG 6V	Leaking Underground Storage Tank Case Listing	California Regional Water Quality Control Boa	06/07/2005	06/07/2005	06/29/2005
US	INDIAN LUST R4	Leaking Underground Storage Tanks on Indian Land	EPA Region 4	06/02/2022	06/13/2022	08/31/2022
US	INDIAN LUST R5	Leaking Underground Storage Tanks on Indian Land	EPA, Region 5	04/11/2022	06/13/2022	08/16/2022
US	INDIAN LUST R6	Leaking Underground Storage Tanks on Indian Land	EPA Region 6	04/28/2022	06/13/2022	08/16/2022
US	INDIAN LUST R10	Leaking Underground Storage Tanks on Indian Land	EPA Region 10	04/20/2022	06/13/2022	08/16/2022
US	INDIAN LUST R8	Leaking Underground Storage Tanks on Indian Land	EPA Region 8	04/20/2022	06/13/2022	08/16/2022
US	INDIAN LUST R1	Leaking Underground Storage Tanks on Indian Land	EPA Region 1	04/28/2021	06/11/2021	09/07/2021
US	INDIAN LUST R9	Leaking Underground Storage Tanks on Indian Land	Environmental Protection Agency	04/08/2022	06/13/2022	08/16/2022
US	INDIAN LUST R7	Leaking Underground Storage Tanks on Indian Land	EPA Region 7	04/14/2022	06/13/2022	08/16/2022
CA	CPS-SLIC	Statewide SLIC Cases (GEOTRACKER)	State Water Resources Control Board	08/31/2022	08/31/2022	11/17/2022
CA	SLIC REG 1	Active Toxic Site Investigations	California Regional Water Quality Control Boa	04/03/2003	04/07/2003	04/25/2003
CA	SLIC REG 2	Spills, Leaks, Investigation & Cleanup Cost Recovery Listing	Regional Water Quality Control Board San Fran	09/30/2004	10/20/2004	11/19/2004
CA	SLIC REG 3	Spills, Leaks, Investigation & Cleanup Cost Recovery Listing	California Regional Water Quality Control Boa	05/18/2006	05/18/2006	06/15/2006
CA	SLIC REG 4	Spills, Leaks, Investigation & Cleanup Cost Recovery Listing	Region Water Quality Control Board Los Angele	11/17/2004	11/18/2004	01/04/2005
CA	SLIC REG 5	Spills, Leaks, Investigation & Cleanup Cost Recovery Listing	Regional Water Quality Control Board Central	04/01/2005	04/05/2005	04/21/2005
CA	SLIC REG 6V	Spills, Leaks, Investigation & Cleanup Cost Recovery Listing	Regional Water Quality Control Board, Victorv	05/24/2005	05/25/2005	06/16/2005
CA	SLIC REG 6L	SLIC Sites	California Regional Water Quality Control Boa	09/07/2004	09/07/2004	10/12/2004
CA	SLIC REG 7	SLIC List	California Regional Quality Control Board, Co	11/24/2004	11/29/2004	01/04/2005
CA	SLIC REG 8	Spills, Leaks, Investigation & Cleanup Cost Recovery Listing	California Region Water Quality Control Board	04/03/2008	04/03/2008	04/14/2008
CA	SLIC REG 9	Spills, Leaks, Investigation & Cleanup Cost Recovery Listing	California Regional Water Quality Control Boa	09/10/2007	09/11/2007	09/28/2007
State and tribal registered storage tank lists						
CA	UST	Active UST Facilities	SWRCB	08/31/2022	08/31/2022	11/28/2022
CA	UST CLOSURE	Proposed Closure of Underground Storage Tank (UST) Cases	State Water Resources Control Board	08/24/2022	08/31/2022	11/21/2022
CA	MILITARY UST SITES	Military UST Sites (GEOTRACKER)	State Water Resources Control Board	08/31/2022	08/31/2022	11/17/2022
CA	AST	Aboveground Petroleum Storage Tank Facilities	California Environmental Protection Agency	07/06/2016	07/12/2016	09/19/2016
US	INDIAN UST R4	Underground Storage Tanks on Indian Land	EPA Region 4	06/02/2022	06/13/2022	08/31/2022
US	INDIAN UST R10	Underground Storage Tanks on Indian Land	EPA Region 10	04/20/2022	06/13/2022	08/16/2022
US	INDIAN UST R7	Underground Storage Tanks on Indian Land	EPA Region 7	04/14/2022	06/13/2022	08/16/2022
US	INDIAN UST R8	Underground Storage Tanks on Indian Land	EPA Region 8	04/20/2022	06/13/2022	08/16/2022
US	INDIAN UST R9	Underground Storage Tanks on Indian Land	EPA Region 9	04/08/2022	06/13/2022	08/16/2022
US	INDIAN UST R1	Underground Storage Tanks on Indian Land	EPA, Region 1	04/07/2022	06/13/2022	08/16/2022
US	INDIAN UST R6	Underground Storage Tanks on Indian Land	EPA Region 6	04/28/2022	06/13/2022	08/16/2022
US	INDIAN UST R5	Underground Storage Tanks on Indian Land	EPA Region 5	04/11/2022	06/13/2022	08/16/2022
US	FEMA UST	Underground Storage Tank Listing	FEMA	10/14/2021	11/05/2021	02/01/2022
State and tribal voluntary cleanup sites						
CA	VCP	Voluntary Cleanup Program Properties	Department of Toxic Substances Control	07/25/2022	07/25/2022	10/05/2022
US	INDIAN VCP R7	Voluntary Cleanup Priority Lisitng	EPA, Region 7	03/20/2008	04/22/2008	05/19/2008
US	INDIAN VCP R1	Voluntary Cleanup Priority Listing	EPA, Region 1	07/27/2015	09/29/2015	02/18/2016

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

St	Acronym	Full Name	Government Agency	Gov Date	Arvl. Date	Active Date
State and tribal Brownfields sites						
CA	BROWNFIELDS	Considered Brownfieds Sites Listing	State Water Resources Control Board	09/19/2022	09/19/2022	12/07/2022
Other Records						
US	CONSENT	Superfund (CERCLA) Consent Decrees	Department of Justice, Consent Decree Library	06/30/2022	07/21/2022	09/30/2022
US	ROD	Records Of Decision	EPA	10/27/2022	11/01/2022	11/15/2022
US	LIENS 2	CERCLA Lien Information	Environmental Protection Agency	10/27/2022	11/01/2022	11/15/2022
CA	HIST CAL-SITES	Calsites Database	Department of Toxic Substance Control	08/08/2005	08/03/2006	08/24/2006
US	DEBRIS REGION 9	Torres Martinez Reservation Illegal Dump Site Locations	EPA, Region 9	01/12/2009	05/07/2009	09/21/2009
CA	SWRCY	Recycler Database	Department of Conservation	08/31/2022	08/31/2022	11/18/2022
CA	CA FID UST	Facility Inventory Database	California Environmental Protection Agency	10/31/1994	09/05/1995	09/29/1995
CA	HIST UST	Hazardous Substance Storage Container Database	State Water Resources Control Board	10/15/1990	01/25/1991	02/12/1991
CA	SAN FRANCISCO AST	Aboveground Storage Tank Site Listing	San Francisco County Department of Public Hea	08/04/2022	08/04/2022	10/20/2022
CA	SWEEPS UST	SWEEPS UST Listing	State Water Resources Control Board	06/01/1994	07/07/2005	08/11/2005
US	PCB TRANSFORMER	PCB Transformer Registration Database	Environmental Protection Agency	09/13/2019	11/06/2019	02/10/2020
US	US HIST CDL	National Clandestine Laboratory Register	Drug Enforcement Administration	07/29/2022	08/18/2022	10/24/2022
US	SCRD DRYCLEANERS	State Coalition for Remediation of Drycleaners Listing	Environmental Protection Agency	01/01/2017	02/03/2017	04/07/2017
US	COAL ASH DOE	Steam-Electric Plant Operation Data	Department of Energy	12/31/2020	11/30/2021	02/22/2022
US	FUSRAP	Formerly Utilized Sites Remedial Action Program	Department of Energy	07/26/2021	07/27/2021	10/22/2021
US	LEAD SMELTER 1	Lead Smelter Sites	Environmental Protection Agency	10/27/2022	11/01/2022	11/15/2022
US	2020 COR ACTION	2020 Corrective Action Program List	Environmental Protection Agency	09/30/2017	05/08/2018	07/20/2018
US	US FIN ASSUR	Financial Assurance Information	Environmental Protection Agency	09/19/2022	09/20/2022	12/22/2022
US	COAL ASH EPA	Coal Combustion Residues Surface Impoundments List	Environmental Protection Agency	01/12/2017	03/05/2019	11/11/2019
US	LEAD SMELTER 2	Lead Smelter Sites	American Journal of Public Health	04/05/2001	10/27/2010	12/02/2010
US	EPA WATCH LIST	EPA WATCH LIST	Environmental Protection Agency	08/30/2013	03/21/2014	06/17/2014
US	US AIRS (AFS)	Aerometric Information Retrieval System Facility Subsystem (	EPA	10/12/2016	10/26/2016	02/03/2017
US	US AIRS MINOR	Air Facility System Data	EPA	10/12/2016	10/26/2016	02/03/2017
US	Delisted NPL	National Priority List Deletions	EPA	10/27/2022	11/01/2022	11/15/2022
US	SEMS-ARCHIVE	Superfund Enterprise Management System Archive	EPA	10/27/2022	11/01/2022	11/15/2022
US	RCRA NonGen / NLR	RCRA - Non Generators / No Longer Regulated	Environmental Protection Agency	11/21/2022	11/21/2022	12/05/2022
US	HMIRS	Hazardous Materials Information Reporting System	U.S. Department of Transportation	09/19/2022	09/19/2022	09/30/2022
US	DOT OPS	Incident and Accident Data	Department of Transporation, Office of Pipeli	01/02/2020	01/28/2020	04/17/2020
US	US CDL	Clandestine Drug Labs	Drug Enforcement Administration	07/29/2022	08/18/2022	10/24/2022
US	US BROWNFIELDS	A Listing of Brownfields Sites	Environmental Protection Agency	02/23/2022	03/10/2022	03/10/2022
US	DOD	Department of Defense Sites	USGS	06/07/2021	07/13/2021	03/09/2022
US	FEDLAND	Federal and Indian Lands	U.S. Geological Survey	04/02/2018	04/11/2018	11/06/2019
US	FUDS	Formerly Used Defense Sites	U.S. Army Corps of Engineers	08/11/2022	08/11/2022	09/30/2022
US	UMTRA	Uranium Mill Tailings Sites	Department of Energy	08/30/2019	11/15/2019	01/28/2020
US	ODI	Open Dump Inventory	Environmental Protection Agency	06/30/1985	08/09/2004	09/17/2004
US	MINES VIOLATIONS	MSHA Violation Assessment Data	DOL, Mine Safety & Health Admi	11/29/2022	11/30/2022	12/22/2022
US	US MINES	Mines Master Index File	Department of Labor, Mine Safety and Health A	08/03/2022	08/17/2022	08/31/2022
US	US MINES 2	Ferrous and Nonferrous Metal Mines Database Listing	USGS	05/06/2020	05/27/2020	08/13/2020
US	US MINES 3	Active Mines & Mineral Plants Database Listing	USGS	04/14/2011	06/08/2011	09/13/2011
US	PRP	Potentially Responsible Parties	EPA	10/27/2022	11/01/2022	11/15/2022
US	TRIS	Toxic Chemical Release Inventory System	EPA	12/31/2018	08/14/2020	11/04/2020
US	TSCA	Toxic Substances Control Act	EPA	12/31/2016	06/17/2020	09/10/2020

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

St	Acronym	Full Name	Government Agency	Gov Date	Arvl. Date	Active Date
US	FTTS	FIFRA/ TSCA Tracking System - FIFRA (Federal Insecticide, Fu	EPA/Office of Prevention, Pesticides and Toxi	04/09/2009	04/16/2009	05/11/2009
US	FTTS INSP	FIFRA/ TSCA Tracking System - FIFRA (Federal Insecticide, Fu	EPA	04/09/2009	04/16/2009	05/11/2009
US	HIST FTTS	FIFRA/TSCA Tracking System Administrative Case Listing	Environmental Protection Agency	10/19/2006	03/01/2007	04/10/2007
US	HIST FTTS INSP	FIFRA/TSCA Tracking System Inspection & Enforcement Case Lis	Environmental Protection Agency	10/19/2006	03/01/2007	04/10/2007
US	SSTS	Section 7 Tracking Systems	EPA	07/18/2022	07/18/2022	07/29/2022
US	ICIS	Integrated Compliance Information System	Environmental Protection Agency	11/18/2016	11/23/2016	02/10/2017
US	PADS	PCB Activity Database System	EPA	01/20/2022	01/20/2022	03/25/2022
US	MLTS	Material Licensing Tracking System	Nuclear Regulatory Commission	10/26/2022	11/22/2022	12/05/2022
US	RADINFO	Radiation Information Database	Environmental Protection Agency	07/01/2019	07/01/2019	09/23/2019
US	FINDS	Facility Index System/Facility Registry System	EPA	08/03/2022	08/25/2022	10/24/2022
US	RAATS	RCRA Administrative Action Tracking System	EPA	04/17/1995	07/03/1995	08/07/1995
US	RMP	Risk Management Plans	Environmental Protection Agency	04/27/2022	05/04/2022	05/10/2022
US	BRS	Biennial Reporting System	EPA/NTIS	12/31/2019	03/02/2022	03/25/2022
US	PWS	Public Water System Data	EPA	12/17/2013	01/09/2014	10/15/2014
US	INDIAN RESERV	Indian Reservations	USGS	12/31/2014	07/14/2015	01/10/2017
US	INDIAN ODI	Report on the Status of Open Dumps on Indian Lands	Environmental Protection Agency	12/31/1998	12/03/2007	01/24/2008
US	IHS OPEN DUMPS	Open Dumps on Indian Land	Department of Health & Human Serivces, Indian	04/01/2014	08/06/2014	01/29/2015
US	ABANDONED MINES	Abandoned Mines	Department of Interior	09/13/2022	09/14/2022	12/05/2022
CA	CA BOND EXP. PLAN	Bond Expenditure Plan	Department of Health Services	01/01/1989	07/27/1994	08/02/1994
CA	CDL	Clandestine Drug Labs	Department of Toxic Substances Control	12/31/2019	01/20/2021	04/08/2021
CA	CHMIRS	California Hazardous Material Incident Report System	Office of Emergency Services	06/30/2022	07/18/2022	09/30/2022
CA	CORTESE	"Cortese" Hazardous Waste & Substances Sites List	CAL EPA/Office of Emergency Information	09/19/2022	09/19/2022	12/07/2022
CA	CUPA LIVERMORE-PLEASANTON	CUPA Facility Listing	Livermore-Pleasanton Fire Department	12/07/2021	05/09/2022	05/17/2022
CA	DEED	Deed Restriction Listing	DTSC and SWRCB	08/25/2022	08/25/2022	11/14/2022
CA	DRYCLEAN AVAQMD	Antelope Valley Air Quality Management District Drycleaner L	Antelope Valley Air Quality Management Distri	05/25/2022	05/26/2022	08/11/2022
CA	DRYCLEANERS	Cleaner Facilities	Department of Toxic Substance Control	08/27/2021	09/01/2021	11/19/2021
CA	DRYCLEAN SOUTH COAST	South Coast Air Quality Management District Drycleaner Listi	South Coast Air Quality Management District	08/18/2022	08/29/2022	11/14/2022
CA	EMI	Emissions Inventory Data	California Air Resources Board	12/31/2020	06/13/2022	08/30/2022
CA	ENF	Enforcement Action Listing	State Water Resoruces Control Board	07/12/2022	07/18/2022	09/29/2022
CA	Financial Assurance 1	Financial Assurance Information Listing	Department of Toxic Substances Control	10/12/2022	10/12/2022	12/29/2022
CA	Financial Assurance 2	Financial Assurance Information Listing	California Integrated Waste Management Board	08/09/2022	08/10/2022	08/30/2022
CA	HAULERS	Registered Waste Tire Haulers Listing	Integrated Waste Management Board	08/12/2022	08/16/2022	08/26/2022
CA	HAZNET	Facility and Manifest Data	California Environmental Protection Agency	12/31/2021	07/05/2022	09/19/2022
CA	HIST CORTESE	Hazardous Waste & Substance Site List	Department of Toxic Substances Control	04/01/2001	01/22/2009	04/08/2009
CA	HWP	EnviroStor Permitted Facilities Listing	Department of Toxic Substances Control	08/11/2022	08/11/2022	10/28/2022
CA	HWT	Registered Hazardous Waste Transporter Database	Department of Toxic Substances Control	10/03/2022	10/03/2022	12/15/2022
CA	ICE	ICE	Department of Toxic Subsances Control	08/11/2022	08/11/2022	10/28/2022
CA	LDS	Land Disposal Sites Listing (GEOTRACKER)	State Water Qualilty Control Board	08/31/2022	08/31/2022	11/17/2022
CA	LIENS	Environmental Liens Listing	Department of Toxic Substances Control	08/23/2022	08/24/2022	11/14/2022
CA	MCS	Military Cleanup Sites Listing (GEOTRACKER)	State Water Resources Control Board	08/31/2022	08/31/2022	11/17/2022
CA	MINES	Mines Site Location Listing	Department of Conservation	08/31/2022	08/31/2022	11/18/2022
CA	MWMP	Medical Waste Management Program Listing	Department of Public Health	08/08/2022	08/25/2022	11/14/2022
CA	NPDES	NPDES Permits Listing	State Water Resources Control Board	08/08/2022	08/08/2022	10/20/2022
CA	PEST LIC	Pesticide Regulation Licenses Listing	Department of Pesticide Regulation	08/25/2022	08/25/2022	11/14/2022
CA	PROC	Certified Processors Database	Department of Conservation	08/31/2022	08/31/2022	11/18/2022
CA	NOTIFY 65	Proposition 65 Records	State Water Resources Control Board	09/07/2022	09/08/2022	11/29/2022
CA	SCH	School Property Evaluation Program	Department of Toxic Substances Control	07/25/2022	07/25/2022	10/05/2022

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

St	Acronym	Full Name	Government Agency	Gov Date	Arvl. Date	Active Date
CA	SPILLS 90	SPILLS90 data from FirstSearch	FirstSearch	06/06/2012	01/03/2013	02/22/2013
CA	TOXIC PITS	Toxic Pits Cleanup Act Sites	State Water Resources Control Board	07/01/1995	08/30/1995	09/26/1995
CA	UIC	UIC Listing	Deaprtment of Conservation	08/31/2022	08/31/2022	11/18/2022
CA	WASTEWATER PITS	Oil Wastewater Pits Listing	RWQCB, Central Valley Region	02/11/2021	07/01/2021	09/29/2021
CA	WDS	Waste Discharge System	State Water Resources Control Board	06/19/2007	06/20/2007	06/29/2007
CA	WIP	Well Investigation Program Case List	Los Angeles Water Quality Control Board	07/03/2009	07/21/2009	08/03/2009
CA	WMUDS/SWAT	Waste Management Unit Database	State Water Resources Control Board	04/01/2000	04/10/2000	05/10/2000
CA	PROD WATER PONDS	Produced Water Ponds Sites (GEOTRACKER)	State Water Resources Control Board	08/31/2022	08/31/2022	11/17/2022
CA	PROJECT	Project Sites (GEOTRACKER)	State Water Resources Control Board	08/31/2022	08/31/2022	11/17/2022
CA	SAMPLING POINT	Sampling Point ? Public Sites (GEOTRACKER)	State Water Resources Control Board	08/31/2022	08/31/2022	11/17/2022
CA	PFAS	PFAS Contamination Site Location Listing	State Water Resources Control Board	08/31/2022	08/31/2022	10/31/2022
CA	AQUEOUS FOAM	Former Fire Training Facility Assessments Listing	State Water Resources Control Board	09/06/2022	09/06/2022	10/26/2022
US	PFAS RCRA MANIFEST	PFAS Transfers Identified In the RCRA Database Listing	Environmental Protection Agency	01/03/2022	03/31/2022	11/08/2022
CA	HWTS	Hazardous Waste Tracking System	Department of Toxic Substances Control	04/05/2022	04/05/2022	04/26/2022
US	UXO	Unexploded Ordnance Sites	Department of Defense	12/31/2020	01/11/2022	02/14/2022
US	PFAS NPL	Superfund Sites with PFAS Detections Information	Environmental Protection Agency	02/23/2022	07/08/2022	11/08/2022
US	AQUEOUS FOAM NRC	Aqueous Foam Related Incidents Listing	Environmental Protection Agency	02/23/2022	03/31/2022	11/08/2022
US	PFAS TSCA	PFAS Manufacture and Imports Information	Environmental Protection Agency	01/03/2022	03/31/2022	11/08/2022
CA	UIC GEO	Underground Injection Control Sites (GEOTRACKER)	State Water Resource Control Board	08/31/2022	08/31/2022	11/17/2022
US	PFAS ECHO	Facilities in Industries that May Be Handling PFAS Listing	Environmental Protection Agency	01/03/2022	03/31/2022	11/08/2022
US	MINES MRDS	Mineral Resources Data System	USGS	04/06/2018	10/21/2019	10/24/2019
US	FEDERAL FACILITY	Federal Facility Site Information listing	Environmental Protection Agency	08/25/2022	09/06/2022	12/05/2022
US	PFAS FEDERAL SITES	Federal Sites PFAS Information	Environmental Protection Agency	02/23/2022	03/31/2022	11/08/2022
US	PFAS PART 139 AIRPORT	All Certified Part 139 Airports PFAS Information Listing	Environmental Protection Agency	08/22/2018	10/26/2022	11/08/2022
US	PFAS ECHO FIRE TRAINING	Facilities in Industries that May Be Handling PFAS Listing	Environmental Protection Agency	08/22/2018	03/31/2022	11/08/2022
US	PFAS WQP	Ambient Environmental Sampling for PFAS	Environmental Protection Agency	01/03/2022	03/31/2022	11/08/2022
CA	WDR	Waste Discharge Requirements Listing	State Water Resources Control Board	08/31/2022	08/31/2022	11/18/2022
CA	CIWQS	California Integrated Water Quality System	State Water Resources Control Board	08/16/2022	08/17/2022	08/18/2022
US	FUELS PROGRAM	EPA Fuels Program Registered Listing	EPA	08/11/2022	08/11/2022	09/30/2022
US	PFAS NPDES	Clean Water Act Discharge Monitoring Information	Environmental Protection Agency	01/03/2022	03/31/2022	11/08/2022
US	PFAS ATSDR	PFAS Contamination Site Location Listing	Department of Health & Human Services	06/24/2020	03/17/2021	11/08/2022
CA	WELL STIM PROJ	Well Stimulation Project (GEOTRACKER)	State Water Resources Control Board	08/31/2022	08/31/2022	11/17/2022
CA	CERS	CalEPA Regulated Site Portal Data	California Environmental Protection Agency	07/18/2022	07/18/2022	09/30/2022
CA	CERS HAZ WASTE	CERS HAZ WASTE	CalEPA	07/18/2022	07/18/2022	09/30/2022
CA	CERS TANKS	California Environmental Reporting System (CERS) Tanks	California Environmental Protection Agency	07/18/2022	07/18/2022	09/30/2022
CA	MILITARY PRIV SITES	Military Privatized Sites (GEOTRACKER)	State Water Resources Control Board	08/31/2022	08/31/2022	11/17/2022
US	ECHO	Enforcement & Compliance History Information	Environmental Protection Agency	09/25/2022	09/30/2022	12/22/2022
US	DOCKET HWC	Hazardous Waste Compliance Docket Listing	Environmental Protection Agency	05/06/2021	05/21/2021	08/11/2021
CA	NON-CASE INFO	Non-Case Information Sites (GEOTRACKER)	State Water Resources Control Board	08/31/2022	08/31/2022	11/17/2022
CA	OTHER OIL GAS	Other Oil & Gas Projects Sites (GEOTRACKER)	State Water Resources Control Board	08/31/2022	08/31/2022	11/17/2022

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

St	Acronym	Full Name	Government Agency	Gov Date	Arvl. Date	Active Date
HISTORICAL USE RECORDS						
US	EDR MGP	EDR Proprietary Manufactured Gas Plants	EDR, Inc.			
US	EDR Hist Auto	EDR Exclusive Historical Auto Stations	EDR, Inc.			
US	EDR Hist Cleaner	EDR Exclusive Historical Cleaners	EDR, Inc.			
CA	RGA LF	Recovered Government Archive Solid Waste Facilities List	Department of Resources Recycling and Recover		07/01/2013	01/13/2014
CA	RGA LUST	Recovered Government Archive Leaking Underground Storage Tan	State Water Resources Control Board		07/01/2013	12/30/2013
COUNTY RECORDS						
CA	CS ALAMEDA	Contaminated Sites	Alameda County Environmental Health Services	01/09/2019	01/11/2019	03/05/2019
CA	UST ALAMEDA	Underground Tanks	Alameda County Environmental Health Services	09/28/2022	09/29/2022	12/14/2022
CA	CUPA AMADOR	CUPA Facility List	Amador County Environmental Health	07/22/2022	07/27/2022	08/01/2022
CA	CUPA BUTTE	CUPA Facility Listing	Public Health Department	04/21/2017	04/25/2017	08/09/2017
CA	CUPA CALVERAS	CUPA Facility Listing	Calveras County Environmental Health	12/13/2022	12/15/2022	12/21/2022
CA	CUPA COLUSA	CUPA Facility List	Health & Human Services	04/06/2020	04/23/2020	07/10/2020
CA	SL CONTRA COSTA	Site List	Contra Costa Health Services Department	07/20/2022	07/20/2022	10/03/2022
CA	CUPA DEL NORTE	CUPA Facility List	Del Norte County Environmental Health Divisio	05/04/2022	05/06/2022	07/28/2022
CA	CUPA EL DORADO	CUPA Facility List	El Dorado County Environmental Management Dep	08/08/2022	08/09/2022	09/01/2022
CA	CUPA FRESNO	CUPA Resources List	Dept. of Community Health	06/28/2021	12/21/2021	03/03/2022
CA	CUPA GLENN	CUPA Facility List	Glenn County Air Pollution Control District	01/22/2018	01/24/2018	03/14/2018
CA	CUPA HUMBOLDT	CUPA Facility List	Humboldt County Environmental Health	08/12/2021	08/12/2021	11/08/2021
CA	CUPA IMPERIAL	CUPA Facility List	San Diego Border Field Office	10/11/2022	10/12/2022	12/29/2022
CA	CUPA INYO	CUPA Facility List	Inyo County Environmental Health Services	04/02/2018	04/03/2018	06/14/2018
CA	CUPA KERN	CUPA Facility List	Kern County Public Health	10/03/2022	10/05/2022	12/16/2022
CA	UST KERN	Underground Storage Tank Sites & Tank Listing	Kern County Environment Health Services Depar	10/03/2022	10/05/2022	12/16/2022
CA	CUPA KINGS	CUPA Facility List	Kings County Department of Public Health	12/03/2020	01/26/2021	04/14/2021
CA	CUPA LAKE	CUPA Facility List	Lake County Environmental Health	07/22/2022	07/25/2022	10/05/2022
CA	CUPA LASSEN	CUPA Facility List	Lassen County Environmental Health	07/31/2020	08/21/2020	11/09/2020
CA	AOCONCERN	Key Areas of Concerns in Los Angeles County		03/30/2009	03/31/2009	10/23/2009
CA	HMS LOS ANGELES	HMS: Street Number List	Department of Public Works	10/03/2022	10/04/2022	12/15/2022
CA	LF LOS ANGELES	List of Solid Waste Facilities	La County Department of Public Works	10/07/2022	10/07/2022	12/21/2022
CA	LF LOS ANGELES CITY	City of Los Angeles Landfills	Engineering & Construction Division	01/01/2022	01/21/2022	04/11/2022
CA	LOS ANGELES AST	Active & Inactive AST Inventory	Los Angeles Fire Department	06/01/2019	06/25/2019	08/22/2019
CA	LOS ANGELES CO LF METHANE	Methane Producing Landfills	Los Angeles County Department of Public Works	01/10/2022	01/12/2022	04/04/2022
CA	LOS ANGELES HM	Active & Inactive Hazardous Materials Inventory	Los Angeles Fire Department	08/30/2022	09/20/2022	12/07/2022
CA	LOS ANGELES UST	Active & Inactive UST Inventory	Los Angeles Fire Department	08/30/2022	09/20/2022	12/08/2022
CA	SITE MIT LOS ANGELES	Site Mitigation List	Community Health Services	05/26/2021	07/09/2021	09/29/2021
CA	UST EL SEGUNDO	City of El Segundo Underground Storage Tank	City of El Segundo Fire Department	01/21/2017	04/19/2017	05/10/2017
CA	UST LONG BEACH	City of Long Beach Underground Storage Tank	City of Long Beach Fire Department	04/22/2019	04/23/2019	06/27/2019
CA	UST TORRANCE	City of Torrance Underground Storage Tank	City of Torrance Fire Department	04/22/2022	07/19/2022	09/30/2022
CA	CUPA MADERA	CUPA Facility List	Madera County Environmental Health	08/10/2020	08/12/2020	10/23/2020
CA	UST MARIN	Underground Storage Tank Sites	Public Works Department Waste Management	09/26/2018	10/04/2018	11/02/2018
CA	UST MENDOCINO	Mendocino County UST Database	Department of Public Health	09/22/2021	11/18/2021	11/22/2021
CA	CUPA MERCED	CUPA Facility List	Merced County Environmental Health	02/15/2022	02/17/2022	05/11/2022
CA	CUPA MONO	CUPA Facility List	Mono County Health Department	02/22/2021	03/02/2021	05/19/2021
CA	CUPA MONTEREY	CUPA Facility Listing	Monterey County Health Department	10/04/2021	10/06/2021	12/29/2021
CA	LUST NAPA	Sites With Reported Contamination	Napa County Department of Environmental Manag	01/09/2017	01/11/2017	03/02/2017

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

St	Acronym	Full Name	Government Agency	Gov Date	Arvl. Date	Active Date
CA	UST NAPA	Closed and Operating Underground Storage Tank Sites	Napa County Department of Environmental Manag	09/05/2019	09/09/2019	10/31/2019
CA	CUPA NEVADA	CUPA Facility List	Community Development Agency	07/21/2022	07/25/2022	07/28/2022
CA	IND_SITE ORANGE	List of Industrial Site Cleanups	Health Care Agency	05/24/2022	08/09/2022	10/28/2022
CA	LUST ORANGE	List of Underground Storage Tank Cleanups	Health Care Agency	04/08/2022	05/18/2022	08/03/2022
CA	UST ORANGE	List of Underground Storage Tank Facilities	Health Care Agency	05/24/2022	08/01/2022	10/20/2022
CA	MS PLACER	Master List of Facilities	Placer County Health and Human Services	08/26/2022	08/29/2022	11/15/2022
CA	CUPA PLUMAS	CUPA Facility List	Plumas County Environmental Health	03/31/2019	04/23/2019	06/26/2019
CA	LUST RIVERSIDE	Listing of Underground Tank Cleanup Sites	Department of Environmental Health	09/22/2022	09/26/2022	12/09/2022
CA	UST RIVERSIDE	Underground Storage Tank Tank List	Department of Environmental Health	09/22/2022	09/26/2022	12/09/2022
CA	CS SACRAMENTO	Toxic Site Clean-Up List	Sacramento County Environmental Management	06/18/2021	09/28/2021	12/14/2021
CA	ML SACRAMENTO	Master Hazardous Materials Facility List	Sacramento County Environmental Management	05/04/2022	06/30/2022	07/05/2022
CA	CUPA SAN BENITO	CUPA Facility List	San Benito County Environmental Health	07/27/2022	07/27/2022	10/11/2022
CA	PERMITS SAN BERNARDINO	Hazardous Material Permits	San Bernardino County Fire Department Hazardo	08/22/2022	08/23/2022	11/11/2022
CA	HMMD SAN DIEGO	Hazardous Materials Management Division Database	Hazardous Materials Management Division	08/25/2022	08/25/2022	11/15/2022
CA	LF SAN DIEGO	Solid Waste Facilities	Department of Health Services	10/27/2021	03/04/2022	05/31/2022
CA	SAN DIEGO CO LOP	Local Oversight Program Listing	Department of Environmental Health	07/22/2021	10/19/2021	01/13/2022
CA	SAN DIEGO CO SAM	Environmental Case Listing	San Diego County Department of Environmental	03/23/2010	06/15/2010	07/09/2010
CA	CUPA SAN FRANCISCO CO	CUPA Facility Listing	San Francisco County Department of Environmen	08/04/2022	08/04/2022	10/20/2022
CA	LUST SAN FRANCISCO	Local Oversite Facilities	Department Of Public Health San Francisco Cou	09/19/2008	09/19/2008	09/29/2008
CA	UST SAN FRANCISCO	Underground Storage Tank Information	Department of Public Health	08/04/2022	08/04/2022	10/20/2022
CA	SAN FRANCISCO MAHER	Maher Ordinance Property Listing	San Francisco Planning	01/18/2022	01/20/2022	04/27/2022
CA	UST SAN JOAQUIN	San Joaquin Co. UST	Environmental Health Department	06/22/2018	06/26/2018	07/11/2018
CA	CUPA SAN LUIS OBISPO	CUPA Facility List	San Luis Obispo County Public Health Departme	08/10/2022	08/11/2022	10/28/2022
CA	BI SAN MATEO	Business Inventory	San Mateo County Environmental Health Service	02/20/2020	02/20/2020	04/24/2020
CA	LUST SAN MATEO	Fuel Leak List	San Mateo County Environmental Health Service	03/29/2019	03/29/2019	05/29/2019
CA	CUPA SANTA BARBARA	CUPA Facility Listing	Santa Barbara County Public Health Department	09/08/2011	09/09/2011	10/07/2011
CA	CUPA SANTA CLARA	Cupa Facility List	Department of Environmental Health	05/16/2022	05/18/2022	08/04/2022
CA	HIST LUST SANTA CLARA	HIST LUST - Fuel Leak Site Activity Report	Santa Clara Valley Water District	03/29/2005	03/30/2005	04/21/2005
CA	LUST SANTA CLARA	LOP Listing	Department of Environmental Health	03/03/2014	03/05/2014	03/18/2014
CA	SAN JOSE HAZMAT	Hazardous Material Facilities	City of San Jose Fire Department	11/03/2020	11/05/2020	01/26/2021
CA	CUPA SANTA CRUZ	CUPA Facility List	Santa Cruz County Environmental Health	01/21/2017	02/22/2017	05/23/2017
CA	CUPA SHASTA	CUPA Facility List	Shasta County Department of Resource Manageme	06/15/2017	06/19/2017	08/09/2017
CA	LUST SOLANO	Leaking Underground Storage Tanks	Solano County Department of Environmental Man	06/04/2019	06/06/2019	08/13/2019
CA	UST SOLANO	Underground Storage Tanks	Solano County Department of Environmental Man	09/15/2021	09/16/2021	12/09/2021
CA	CUPA SONOMA	Cupa Facility List	County of Sonoma Fire & Emergency Services De	07/02/2021	07/06/2021	07/14/2021
CA	LUST SONOMA	Leaking Underground Storage Tank Sites	Department of Health Services	06/30/2021	06/30/2021	09/24/2021
CA	CUPA STANISLAUS	CUPA Facility List	Stanislaus County Department of Ennvironmenta	02/08/2022	02/10/2022	05/04/2022
CA	UST SUTTER	Underground Storage Tanks	Sutter County Environmental Health Services	08/03/2022	08/25/2022	11/14/2022
CA	CUPA TEHAMA	CUPA Facility List	Tehama County Department of Environmental Hea	07/27/2022	07/27/2022	10/11/2022
CA	CUPA TRINITY	CUPA Facility List	Department of Toxic Substances Control	10/11/2022	10/12/2022	12/29/2022
CA	CUPA TULARE	CUPA Facility List	Tulare County Environmental Health Services D	10/07/2022	10/07/2022	12/21/2022
CA	CUPA TUOLUMNE	CUPA Facility List	Divison of Environmental Health	04/23/2018	04/25/2018	06/25/2018
CA	BWT VENTURA	Business Plan, Hazardous Waste Producers, and Operating Unde	Ventura County Environmental Health Division	05/26/2022	07/21/2022	09/30/2022
CA	LF VENTURA	Inventory of Illegal Abandoned and Inactive Sites	Environmental Health Division	12/01/2011	12/01/2011	01/19/2012
CA	LUST VENTURA	Listing of Underground Tank Cleanup Sites	Environmental Health Division	05/29/2008	06/24/2008	07/31/2008
CA	MED WASTE VENTURA	Medical Waste Program List	Ventura County Resource Management Agency	05/26/2022	07/25/2022	10/05/2022
CA	UST VENTURA	Underground Tank Closed Sites List	Environmental Health Division	08/29/2022	08/31/2022	11/21/2022

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

St	Acronym	Full Name	Government Agency	Gov Date	Arvl. Date	Active Date
CA	UST YOLO	Underground Storage Tank Comprehensive Facility Report	Yolo County Department of Health	09/21/2022	09/30/2022	12/14/2022
CA	CUPA YUBA	CUPA Facility List	Yuba County Environmental Health Department	10/25/2022	10/26/2022	10/31/2022

STREET AND ADDRESS INFORMATION

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APPENDIX H

QUALIFICATIONS
OF
ENVIRONMENTAL PROFESSIONALS

ARAM B. KALOUSTIAN, P.E.
Principal

Mr. Aram Kaloustian has diversified experience in environmental, mechanical and civil engineering including indoor air quality surveys for mold and ventilation systems, asbestos and lead-based paint assessments, Phase I environmental surveys, subsurface environmental site assessments, remedial design, remediation system installation and operation, negotiations with regulatory agencies, computer modeling, research of new environmental investigative and remedial technologies, safety engineering and project management.

Mr. Kaloustian has conducted numerous assessments involving indoor air quality, asbestos and lead-based paint surveys and associated remediation projects by establishing investigative protocol, implementing efficient assessment strategies, and applying the site specific and appropriate remedial recommendations to all assessed projects. Mr. Kaloustian has also designed a variety of protocols for remedial and post-remedial monitoring services for a wide variety of project sites.

Mr. Kaloustian has conducted numerous historical and background Phase I investigations involving review of files located at various county health departments, water quality control boards, state departments of health, air quality management districts, city building departments, city departments of public works and city fire departments. These investigations also involved searches of state and federal databases for hazardous waste sites, generators, transporters and treatment/storage/disposal facilities, title searches, aerial photo reviews and visual site inspections.

Mr. Kaloustian has extensive subsurface site assessment experience involving underground storage tanks, exploratory borings and monitoring wells, implementation of monitoring and sampling programs, evaluation of monitoring and sampling data, review of historical site and site vicinity information, agency negotiations, and assessment and remediation recommendations.

Mr. Kaloustian's remedial design experience includes various vapor extraction and groundwater remediation systems for remediation of soil and groundwater impacted by hydrocarbon contamination. Mr. Kaloustian has designed and implemented vapor extraction treatment systems that have included internal combustion engines, catalytic thermal oxidizers and carbon adsorption. Groundwater treatment systems have included spray aeration tanks, carbon adsorption and air strippers.

Regulatory compliance experience includes obtaining permits for removal of underground storage tanks, drilling exploratory borings, installation of monitoring wells, and installation of vapor extraction treatment systems and groundwater treatment systems. This has required working with local county health departments, city departments of public works, city fire departments,

air quality management districts, a number of publicly owned treatment works and the California Regional Water Quality Control Board.

Mr. Kaloustian has also constructed and evaluated various computer models for site assessment and remediation including models used to evaluate the vacuum influence of vapor extraction systems, the radius of influence of groundwater extraction, fate and transport analysis of contaminant's, and aquifer test data.

Mr. Kaloustian has also participated and has been the lead engineer in the research and development of new investigative and remedial techniques involving indoor air quality, horizontal drilling; and treatment of contaminated soil and sludge materials using remedial surfactants, bioremediation, soil washing, encapsulation and modified oxidation. Additional research experience includes participation in the South Coast Air Quality Survey in 1987 for research involving atmospheric chemistry.

Throughout the years, Mr. Kaloustian has also maintained certification and continuing education for Hazardous Waste Operations and Emergency Response (29CFR1910.120) and supervisory training; and has developed site specific health and safety plans for site assessment and remediation. Mr. Kaloustian has also been responsible for the development and implementation of a safety procedures manual for environmental assessment and remediation firms.

Registrations:	Registered Professional Civil Engineer, State of California Registered Professional Civil Engineer, State of Arizona Registered Professional Civil Engineer, State of Hawaii Registered Professional Civil Engineer, State of Texas Registered Professional Civil Engineer, State of Utah Registered Environmental Assessor, State of California (1994-1999)
Affiliations:	American Industrial Hygiene Association – Consultant Member National Society of Professional Engineers – Member California Ground Water Association - Member
Education:	M.S., Construction Engineering and Management, Stanford University B.S., Engineering and Applied Science, California Institute of Technology Indoor Air Quality Certification from the American Industrial Hygiene Association OSHA 40-Hour Hazardous Waste Operations Training and Certification Certified AHERA asbestos building inspector and management planner

APPENDIX B

AIR QUALITY MODELING RESULTS

Drake Avenue Apartments - Bay Area AQMD Air District, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

Drake Avenue Apartments

Bay Area AQMD Air District, Annual

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Apartments Mid Rise	74.00	Dwelling Unit	0.79	74,000.00	212
Parking Lot	24.00	Space	0.22	9,600.00	0

1.2 Other Project Characteristics

Urbanization	Urban	**Wind Speed (m/s)**	2.2	**Precipitation Freq (Days)**	64
Climate Zone	5			**Operational Year**	2025
Utility Company	Pacific Gas and Electric Company				
CO2 Intensity (lb/MWhr)	203.98	**CH4 Intensity (lb/MWhr)**	0.033	**N2O Intensity (lb/MWhr)**	0.004

1.3 User Entered Comments & Non-Default Data

Project Characteristics -

Land Use - Lot acreage udpated per site plan.

Construction Phase - Phase timing adjusted per applicant-provided AQ Questionnaire.

Grading -

Demolition -

Area Mitigation -

Mobile Land Use Mitigation - Project would increase transit accessibility, and improve pedestrian network on- and off-site.

Table Name	Column Name	Default Value	New Value
tblConstructionPhase	NumDays	10.00	370.00
tblConstructionPhase	NumDays	200.00	370.00

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

tblConstructionPhase	NumDays	20.00	30.00
tblConstructionPhase	NumDays	4.00	35.00
tblConstructionPhase	NumDays	10.00	30.00
tblConstructionPhase	NumDays	2.00	30.00
tblConstructionPhase	PhaseEndDate	4/8/2024	4/4/2025
tblConstructionPhase	PhaseEndDate	3/11/2024	3/21/2025
tblConstructionPhase	PhaseEndDate	5/26/2023	6/9/2023
tblConstructionPhase	PhaseEndDate	6/5/2023	9/8/2023
tblConstructionPhase	PhaseEndDate	3/25/2024	10/20/2023
tblConstructionPhase	PhaseEndDate	5/30/2023	7/21/2023
tblConstructionPhase	PhaseStartDate	3/26/2024	11/4/2023
tblConstructionPhase	PhaseStartDate	6/6/2023	10/21/2023
tblConstructionPhase	PhaseStartDate	5/31/2023	7/22/2023
tblConstructionPhase	PhaseStartDate	3/12/2024	9/9/2023
tblConstructionPhase	PhaseStartDate	5/27/2023	6/10/2023
tblLandUse	LotAcreage	1.95	0.79

2.0 Emissions Summary

Drake Avenue Apartments - Bay Area AQMD Air District, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

2.1 Overall Construction

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2023	0.1770	1.0815	0.9923	2.0000e-003	0.2389	0.0474	0.2863	0.1105	0.0445	0.1550	0.0000	173.3174	173.3174	0.0397	1.1000e-003	174.6384
2024	0.6025	1.6754	2.0775	4.0900e-003	0.0781	0.0677	0.1458	0.0210	0.0656	0.0865	0.0000	348.0751	348.0751	0.0434	4.8000e-003	350.5906
2025	0.1452	0.3553	0.4652	9.2000e-004	0.0177	0.0133	0.0310	4.7600e-003	0.0129	0.0176	0.0000	78.2870	78.2870	9.4700e-003	1.0400e-003	78.8330
Maximum	**0.6025**	**1.6754**	**2.0775**	**4.0900e-003**	**0.2389**	**0.0677**	**0.2863**	**0.1105**	**0.0656**	**0.1550**	**0.0000**	**348.0751**	**348.0751**	**0.0434**	**4.8000e-003**	**350.5906**

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2023	0.1770	1.0815	0.9923	2.0000e-003	0.2389	0.0474	0.2863	0.1105	0.0445	0.1550	0.0000	173.3172	173.3172	0.0397	1.1000e-003	174.6382
2024	0.6025	1.6754	2.0775	4.0900e-003	0.0781	0.0677	0.1458	0.0210	0.0656	0.0865	0.0000	348.0748	348.0748	0.0434	4.8000e-003	350.5903
2025	0.1452	0.3553	0.4652	9.2000e-004	0.0177	0.0133	0.0310	4.7600e-003	0.0129	0.0176	0.0000	78.2869	78.2869	9.4700e-003	1.0400e-003	78.8329
Maximum	**0.6025**	**1.6754**	**2.0775**	**4.0900e-003**	**0.2389**	**0.0677**	**0.2863**	**0.1105**	**0.0656**	**0.1550**	**0.0000**	**348.0748**	**348.0748**	**0.0434**	**4.8000e-003**	**350.5903**

Drake Avenue Apartments - Bay Area AQMD Air District, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

Quarter	Start Date	End Date	Maximum Unmitigated ROG + NOX (tons/quarter)	Maximum Mitigated ROG + NOX (tons/quarter)
1	**5-1-2023**	**7-31-2023**	0.4875	0.4875
2	**8-1-2023**	**10-31-2023**	0.3797	0.3797
3	**11-1-2023**	**1-31-2024**	0.5867	0.5867
4	**2-1-2024**	**4-30-2024**	0.5594	0.5594
5	**5-1-2024**	**7-31-2024**	0.5708	0.5708
6	**8-1-2024**	**10-31-2024**	0.5713	0.5713
7	**11-1-2024**	**1-31-2025**	0.5630	0.5630
8	**2-1-2025**	**4-30-2025**	0.3109	0.3109
		Highest	0.5867	0.5867

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	0.5292	0.0103	0.7843	5.0000e-004		0.0367	0.0367		0.0367	0.0367	3.3736	2.2837	5.6573	6.2800e-003	2.2000e-004	5.8803
Energy	3.3700e-003	0.0288	0.0123	1.8000e-004		2.3300e-003	2.3300e-003		2.3300e-003	2.3300e-003	0.0000	60.2607	60.2607	4.9900e-003	1.1400e-003	60.7250
Mobile	0.1527	0.1695	1.4188	2.9400e-003	0.3258	2.1800e-003	0.3280	0.0870	2.0300e-003	0.0891	0.0000	278.4389	278.4389	0.0181	0.0133	282.8602
Waste						0.0000	0.0000		0.0000	0.0000	6.9098	0.0000	6.9098	0.4084	0.0000	17.1188
Water						0.0000	0.0000		0.0000	0.0000	1.5296	3.3981	4.9277	0.1577	3.7800e-003	9.9944
Total	**0.6853**	**0.2086**	**2.2153**	**3.6200e-003**	**0.3258**	**0.0412**	**0.3670**	**0.0870**	**0.0410**	**0.1281**	**11.8131**	**344.3814**	**356.1945**	**0.5954**	**0.0185**	**376.5787**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

2.2 Overall Operational

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	0.3584	6.3300e-003	0.5492	3.0000e-005		3.0500e-003	3.0500e-003		3.0500e-003	3.0500e-003	0.0000	0.8980	0.8980	8.6000e-004	0.0000	0.9195
Energy	3.3700e-003	0.0288	0.0123	1.8000e-004		2.3300e-003	2.3300e-003		2.3300e-003	2.3300e-003	0.0000	60.2607	60.2607	4.9900e-003	1.1400e-003	60.7250
Mobile	0.1446	0.1546	1.2960	2.6100e-003	0.2873	1.9600e-003	0.2893	0.0768	1.8200e-003	0.0786	0.0000	246.6374	246.6374	0.0168	0.0122	250.6835
Waste						0.0000	0.0000		0.0000	0.0000	6.9098	0.0000	6.9098	0.4084	0.0000	17.1188
Water						0.0000	0.0000		0.0000	0.0000	1.5296	3.3981	4.9277	0.1577	3.7800e-003	9.9944
Total	**0.5064**	**0.1897**	**1.8574**	**2.8200e-003**	**0.2873**	**7.3400e-003**	**0.2947**	**0.0768**	**7.2000e-003**	**0.0840**	**8.4394**	**311.1942**	**319.6336**	**0.5887**	**0.0171**	**339.4412**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**26.10**	**9.04**	**16.16**	**22.10**	**11.80**	**82.17**	**19.70**	**11.80**	**82.45**	**34.43**	**28.56**	**9.64**	**10.26**	**1.12**	**7.48**	**9.86**

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Demolition	Demolition	5/1/2023	6/9/2023	5	30	
2	Site Preparation	Site Preparation	6/10/2023	7/21/2023	5	30	
3	Grading	Grading	7/22/2023	9/8/2023	5	35	

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

4	Building Construction	Building Construction	10/21/2023	3/21/2025	5	370	
5	Paving	Paving	9/9/2023	10/20/2023	5	30	
6	Architectural Coating	Architectural Coating	11/4/2023	4/4/2025	5	370	

Acres of Grading (Site Preparation Phase): 28.13

Acres of Grading (Grading Phase): 35

Acres of Paving: 0.22

Residential Indoor: 149,850; Residential Outdoor: 49,950; Non-Residential Indoor: 0; Non-Residential Outdoor: 0; Striped Parking Area: 576 (Architectural Coating – sqft)

OffRoad Equipment

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Architectural Coating	Air Compressors	1	6.00	78	0.48
Paving	Cement and Mortar Mixers	1	6.00	9	0.56
Demolition	Concrete/Industrial Saws	1	8.00	81	0.73
Building Construction	Cranes	1	6.00	231	0.29
Building Construction	Forklifts	1	6.00	89	0.20
Building Construction	Generator Sets	1	8.00	84	0.74
Grading	Graders	1	8.00	187	0.41
Site Preparation	Graders	1	8.00	187	0.41
Paving	Pavers	1	6.00	130	0.42
Paving	Paving Equipment	1	8.00	132	0.36
Paving	Rollers	1	7.00	80	0.38
Demolition	Rubber Tired Dozers	1	8.00	247	0.40
Grading	Rubber Tired Dozers	1	8.00	247	0.40
Site Preparation	Rubber Tired Dozers	1	7.00	247	0.40
Building Construction	Tractors/Loaders/Backhoes	1	6.00	97	0.37
Demolition	Tractors/Loaders/Backhoes	3	8.00	97	0.37
Grading	Tractors/Loaders/Backhoes	2	7.00	97	0.37

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

Paving	Tractors/Loaders/Backhoes	1	8.00	97	0.37
Site Preparation	Tractors/Loaders/Backhoes	1	8.00	97	0.37
Building Construction	Welders	3	8.00	46	0.45

Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Demolition	5	13.00	0.00	10.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Site Preparation	3	8.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Grading	4	10.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	7	57.00	9.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Paving	5	13.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	1	11.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

3.2 Demolition - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					1.0500e-003	0.0000	1.0500e-003	1.6000e-004	0.0000	1.6000e-004	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0221	0.2148	0.2019	3.6000e-004		0.0102	0.0102		9.4900e-003	9.4900e-003	0.0000	31.6299	31.6299	8.0200e-003	0.0000	31.8303
Total	**0.0221**	**0.2148**	**0.2019**	**3.6000e-004**	**1.0500e-003**	**0.0102**	**0.0112**	**1.6000e-004**	**9.4900e-003**	**9.6500e-003**	**0.0000**	**31.6299**	**31.6299**	**8.0200e-003**	**0.0000**	**31.8303**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.2 Demolition - 2023

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	1.0000e-005	6.8000e-004	1.6000e-004	0.0000	8.0000e-005	1.0000e-005	9.0000e-005	2.0000e-005	1.0000e-005	3.0000e-005	0.0000	0.2984	0.2984	1.0000e-005	5.0000e-005	0.3127
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	5.0000e-004	3.4000e-004	4.3200e-003	1.0000e-005	1.5400e-003	1.0000e-005	1.5500e-003	4.1000e-004	1.0000e-005	4.2000e-004	0.0000	1.2076	1.2076	3.0000e-005	3.0000e-005	1.2184
Total	**5.1000e-004**	**1.0200e-003**	**4.4800e-003**	**1.0000e-005**	**1.6200e-003**	**2.0000e-005**	**1.6400e-003**	**4.3000e-004**	**2.0000e-005**	**4.5000e-004**	**0.0000**	**1.5060**	**1.5060**	**4.0000e-005**	**8.0000e-005**	**1.5311**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					1.0500e-003	0.0000	1.0500e-003	1.6000e-004	0.0000	1.6000e-004	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0221	0.2148	0.2019	3.6000e-004		0.0102	0.0102		9.4900e-003	9.4900e-003	0.0000	31.6298	31.6298	8.0200e-003	0.0000	31.8303
Total	**0.0221**	**0.2148**	**0.2019**	**3.6000e-004**	**1.0500e-003**	**0.0102**	**0.0112**	**1.6000e-004**	**9.4900e-003**	**9.6500e-003**	**0.0000**	**31.6298**	**31.6298**	**8.0200e-003**	**0.0000**	**31.8303**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.2 Demolition - 2023

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	1.0000e-005	6.8000e-004	1.6000e-004	0.0000	8.0000e-005	1.0000e-005	9.0000e-005	2.0000e-005	1.0000e-005	3.0000e-005	0.0000	0.2984	0.2984	1.0000e-005	5.0000e-005	0.3127
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	5.0000e-004	3.4000e-004	4.3200e-003	1.0000e-005	1.5400e-003	1.0000e-005	1.5500e-003	4.1000e-004	1.0000e-005	4.2000e-004	0.0000	1.2076	1.2076	3.0000e-005	3.0000e-005	1.2184
Total	**5.1000e-004**	**1.0200e-003**	**4.4800e-003**	**1.0000e-005**	**1.6200e-003**	**2.0000e-005**	**1.6400e-003**	**4.3000e-004**	**2.0000e-005**	**4.5000e-004**	**0.0000**	**1.5060**	**1.5060**	**4.0000e-005**	**8.0000e-005**	**1.5311**

3.3 Site Preparation - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.0940	0.0000	0.0940	0.0451	0.0000	0.0451	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0170	0.1864	0.0996	2.6000e-004		7.6100e-003	7.6100e-003		7.0000e-003	7.0000e-003	0.0000	22.6713	22.6713	7.3300e-003	0.0000	22.8546
Total	**0.0170**	**0.1864**	**0.0996**	**2.6000e-004**	**0.0940**	**7.6100e-003**	**0.1016**	**0.0451**	**7.0000e-003**	**0.0521**	**0.0000**	**22.6713**	**22.6713**	**7.3300e-003**	**0.0000**	**22.8546**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.3 Site Preparation - 2023

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	3.1000e-004	2.1000e-004	2.6600e-003	1.0000e-005	9.5000e-004	0.0000	9.5000e-004	2.5000e-004	0.0000	2.6000e-004	0.0000	0.7432	0.7432	2.0000e-005	2.0000e-005	0.7498
Total	**3.1000e-004**	**2.1000e-004**	**2.6600e-003**	**1.0000e-005**	**9.5000e-004**	**0.0000**	**9.5000e-004**	**2.5000e-004**	**0.0000**	**2.6000e-004**	**0.0000**	**0.7432**	**0.7432**	**2.0000e-005**	**2.0000e-005**	**0.7498**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.0940	0.0000	0.0940	0.0451	0.0000	0.0451	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0170	0.1864	0.0996	2.6000e-004		7.6100e-003	7.6100e-003		7.0000e-003	7.0000e-003	0.0000	22.6713	22.6713	7.3300e-003	0.0000	22.8546
Total	**0.0170**	**0.1864**	**0.0996**	**2.6000e-004**	**0.0940**	**7.6100e-003**	**0.1016**	**0.0451**	**7.0000e-003**	**0.0521**	**0.0000**	**22.6713**	**22.6713**	**7.3300e-003**	**0.0000**	**22.8546**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.3 Site Preparation - 2023

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	3.1000e-004	2.1000e-004	2.6600e-003	1.0000e-005	9.5000e-004	0.0000	9.5000e-004	2.5000e-004	0.0000	2.6000e-004	0.0000	0.7432	0.7432	2.0000e-005	2.0000e-005	0.7498
Total	**3.1000e-004**	**2.1000e-004**	**2.6600e-003**	**1.0000e-005**	**9.5000e-004**	**0.0000**	**9.5000e-004**	**2.5000e-004**	**0.0000**	**2.6000e-004**	**0.0000**	**0.7432**	**0.7432**	**2.0000e-005**	**2.0000e-005**	**0.7498**

3.4 Grading - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.1240	0.0000	0.1240	0.0599	0.0000	0.0599	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0233	0.2532	0.1523	3.6000e-004		0.0106	0.0106		9.7300e-003	9.7300e-003	0.0000	31.6819	31.6819	0.0103	0.0000	31.9380
Total	**0.0233**	**0.2532**	**0.1523**	**3.6000e-004**	**0.1240**	**0.0106**	**0.1345**	**0.0599**	**9.7300e-003**	**0.0697**	**0.0000**	**31.6819**	**31.6819**	**0.0103**	**0.0000**	**31.9380**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.4 Grading - 2023

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	4.5000e-004	3.1000e-004	3.8800e-003	1.0000e-005	1.3800e-003	1.0000e-005	1.3900e-003	3.7000e-004	1.0000e-005	3.7000e-004	0.0000	1.0838	1.0838	3.0000e-005	3.0000e-005	1.0934
Total	**4.5000e-004**	**3.1000e-004**	**3.8800e-003**	**1.0000e-005**	**1.3800e-003**	**1.0000e-005**	**1.3900e-003**	**3.7000e-004**	**1.0000e-005**	**3.7000e-004**	**0.0000**	**1.0838**	**1.0838**	**3.0000e-005**	**3.0000e-005**	**1.0934**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.1240	0.0000	0.1240	0.0599	0.0000	0.0599	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0233	0.2532	0.1523	3.6000e-004		0.0106	0.0106		9.7300e-003	9.7300e-003	0.0000	31.6818	31.6818	0.0103	0.0000	31.9380
Total	**0.0233**	**0.2532**	**0.1523**	**3.6000e-004**	**0.1240**	**0.0106**	**0.1345**	**0.0599**	**9.7300e-003**	**0.0697**	**0.0000**	**31.6818**	**31.6818**	**0.0103**	**0.0000**	**31.9380**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.4 Grading - 2023

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	4.5000e-004	3.1000e-004	3.8800e-003	1.0000e-005	1.3800e-003	1.0000e-005	1.3900e-003	3.7000e-004	1.0000e-005	3.7000e-004	0.0000	1.0838	1.0838	3.0000e-005	3.0000e-005	1.0934
Total	**4.5000e-004**	**3.1000e-004**	**3.8800e-003**	**1.0000e-005**	**1.3800e-003**	**1.0000e-005**	**1.3900e-003**	**3.7000e-004**	**1.0000e-005**	**3.7000e-004**	**0.0000**	**1.0838**	**1.0838**	**3.0000e-005**	**3.0000e-005**	**1.0934**

3.5 Building Construction - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0381	0.2928	0.3153	5.5000e-004		0.0129	0.0129		0.0124	0.0124	0.0000	45.3998	45.3998	7.7100e-003	0.0000	45.5925
Total	**0.0381**	**0.2928**	**0.3153**	**5.5000e-004**		**0.0129**	**0.0129**		**0.0124**	**0.0124**	**0.0000**	**45.3998**	**45.3998**	**7.7100e-003**	**0.0000**	**45.5925**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.5 Building Construction - 2023

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	2.4000e-004	0.0100	3.1300e-003	5.0000e-005	1.4800e-003	6.0000e-005	1.5300e-003	4.3000e-004	6.0000e-005	4.8000e-004	0.0000	4.4414	4.4414	9.0000e-005	6.6000e-004	4.6395
Worker	3.6500e-003	2.5000e-003	0.0316	1.0000e-004	0.0113	6.0000e-005	0.0113	3.0000e-003	5.0000e-005	3.0500e-003	0.0000	8.8250	8.8250	2.5000e-004	2.4000e-004	8.9035
Total	**3.8900e-003**	**0.0125**	**0.0347**	**1.5000e-004**	**0.0127**	**1.2000e-004**	**0.0129**	**3.4300e-003**	**1.1000e-004**	**3.5300e-003**	**0.0000**	**13.2664**	**13.2664**	**3.4000e-004**	**9.0000e-004**	**13.5430**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0381	0.2928	0.3153	5.5000e-004		0.0129	0.0129		0.0124	0.0124	0.0000	45.3997	45.3997	7.7100e-003	0.0000	45.5925
Total	**0.0381**	**0.2928**	**0.3153**	**5.5000e-004**		**0.0129**	**0.0129**		**0.0124**	**0.0124**	**0.0000**	**45.3997**	**45.3997**	**7.7100e-003**	**0.0000**	**45.5925**

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.5 Building Construction - 2023

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	2.4000e-004	0.0100	3.1300e-003	5.0000e-005	1.4800e-003	6.0000e-005	1.5300e-003	4.3000e-004	6.0000e-005	4.8000e-004	0.0000	4.4414	4.4414	9.0000e-005	6.6000e-004	4.6395
Worker	3.6500e-003	2.5000e-003	0.0316	1.0000e-004	0.0113	6.0000e-005	0.0113	3.0000e-003	5.0000e-005	3.0500e-003	0.0000	8.8250	8.8250	2.5000e-004	2.4000e-004	8.9035
Total	**3.8900e-003**	**0.0125**	**0.0347**	**1.5000e-004**	**0.0127**	**1.2000e-004**	**0.0129**	**3.4300e-003**	**1.1000e-004**	**3.5300e-003**	**0.0000**	**13.2664**	**13.2664**	**3.4000e-004**	**9.0000e-004**	**13.5430**

3.5 Building Construction - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.1860	1.4494	1.6398	2.8900e-003		0.0590	0.0590		0.0570	0.0570	0.0000	237.9108	237.9108	0.0396	0.0000	238.9013
Total	**0.1860**	**1.4494**	**1.6398**	**2.8900e-003**		**0.0590**	**0.0590**		**0.0570**	**0.0570**	**0.0000**	**237.9108**	**237.9108**	**0.0396**	**0.0000**	**238.9013**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.5 Building Construction - 2024

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	1.2200e-003	0.0524	0.0161	2.4000e-004	7.7400e-003	3.1000e-004	8.0500e-003	2.2400e-003	3.0000e-004	2.5300e-003	0.0000	22.9103	22.9103	4.7000e-004	3.3900e-003	23.9319
Worker	0.0179	0.0117	0.1547	4.8000e-004	0.0590	2.9000e-004	0.0593	0.0157	2.7000e-004	0.0160	0.0000	45.1025	45.1025	1.2100e-003	1.1800e-003	45.4850
Total	**0.0191**	**0.0641**	**0.1708**	**7.2000e-004**	**0.0667**	**6.0000e-004**	**0.0673**	**0.0179**	**5.7000e-004**	**0.0185**	**0.0000**	**68.0128**	**68.0128**	**1.6800e-003**	**4.5700e-003**	**69.4169**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.1860	1.4494	1.6398	2.8900e-003		0.0590	0.0590		0.0570	0.0570	0.0000	237.9105	237.9105	0.0396	0.0000	238.9010
Total	**0.1860**	**1.4494**	**1.6398**	**2.8900e-003**		**0.0590**	**0.0590**		**0.0570**	**0.0570**	**0.0000**	**237.9105**	**237.9105**	**0.0396**	**0.0000**	**238.9010**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.5 Building Construction - 2024

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	1.2200e-003	0.0524	0.0161	2.4000e-004	7.7400e-003	3.1000e-004	8.0500e-003	2.2400e-003	3.0000e-004	2.5300e-003	0.0000	22.9103	22.9103	4.7000e-004	3.3900e-003	23.9319
Worker	0.0179	0.0117	0.1547	4.8000e-004	0.0590	2.9000e-004	0.0593	0.0157	2.7000e-004	0.0160	0.0000	45.1025	45.1025	1.2100e-003	1.1800e-003	45.4850
Total	**0.0191**	**0.0641**	**0.1708**	**7.2000e-004**	**0.0667**	**6.0000e-004**	**0.0673**	**0.0179**	**5.7000e-004**	**0.0185**	**0.0000**	**68.0128**	**68.0128**	**1.6800e-003**	**4.5700e-003**	**69.4169**

3.5 Building Construction - 2025

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0384	0.3020	0.3607	6.4000e-004		0.0114	0.0114		0.0110	0.0110	0.0000	52.6733	52.6733	8.6000e-003	0.0000	52.8883
Total	**0.0384**	**0.3020**	**0.3607**	**6.4000e-004**		**0.0114**	**0.0114**		**0.0110**	**0.0110**	**0.0000**	**52.6733**	**52.6733**	**8.6000e-003**	**0.0000**	**52.8883**

Drake Avenue Apartments - Bay Area AQMD Air District, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.5 Building Construction - 2025

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	2.6000e-004	0.0116	3.4900e-003	5.0000e-005	1.7100e-003	7.0000e-005	1.7800e-003	5.0000e-004	7.0000e-005	5.6000e-004	0.0000	4.9815	4.9815	1.0000e-004	7.4000e-004	5.2036
Worker	3.7200e-003	2.3300e-003	0.0322	1.0000e-004	0.0131	6.0000e-005	0.0131	3.4700e-003	6.0000e-005	3.5300e-003	0.0000	9.7460	9.7460	2.4000e-004	2.5000e-004	9.8252
Total	**3.9800e-003**	**0.0139**	**0.0357**	**1.5000e-004**	**0.0148**	**1.3000e-004**	**0.0149**	**3.9700e-003**	**1.3000e-004**	**4.0900e-003**	**0.0000**	**14.7275**	**14.7275**	**3.4000e-004**	**9.9000e-004**	**15.0288**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0384	0.3020	0.3607	6.4000e-004		0.0114	0.0114		0.0110	0.0110	0.0000	52.6733	52.6733	8.6000e-003	0.0000	52.8883
Total	**0.0384**	**0.3020**	**0.3607**	**6.4000e-004**		**0.0114**	**0.0114**		**0.0110**	**0.0110**	**0.0000**	**52.6733**	**52.6733**	**8.6000e-003**	**0.0000**	**52.8883**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.5 Building Construction - 2025

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	2.6000e-004	0.0116	3.4900e-003	5.0000e-005	1.7100e-003	7.0000e-005	1.7800e-003	5.0000e-004	7.0000e-005	5.6000e-004	0.0000	4.9815	4.9815	1.0000e-004	7.4000e-004	5.2036
Worker	3.7200e-003	2.3300e-003	0.0322	1.0000e-004	0.0131	6.0000e-005	0.0131	3.4700e-003	6.0000e-005	3.5300e-003	0.0000	9.7460	9.7460	2.4000e-004	2.5000e-004	9.8252
Total	**3.9800e-003**	**0.0139**	**0.0357**	**1.5000e-004**	**0.0148**	**1.3000e-004**	**0.0149**	**3.9700e-003**	**1.3000e-004**	**4.0900e-003**	**0.0000**	**14.7275**	**14.7275**	**3.4000e-004**	**9.9000e-004**	**15.0288**

3.6 Paving - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	9.6700e-003	0.0935	0.1320	2.0000e-004		4.6300e-003	4.6300e-003		4.2700e-003	4.2700e-003	0.0000	17.6586	17.6586	5.6000e-003	0.0000	17.7986
Paving	2.9000e-004					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**9.9600e-003**	**0.0935**	**0.1320**	**2.0000e-004**		**4.6300e-003**	**4.6300e-003**		**4.2700e-003**	**4.2700e-003**	**0.0000**	**17.6586**	**17.6586**	**5.6000e-003**	**0.0000**	**17.7986**

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.6 Paving - 2023

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	5.0000e-004	3.4000e-004	4.3200e-003	1.0000e-005	1.5400e-003	1.0000e-005	1.5500e-003	4.1000e-004	1.0000e-005	4.2000e-004	0.0000	1.2076	1.2076	3.0000e-005	3.0000e-005	1.2184
Total	**5.0000e-004**	**3.4000e-004**	**4.3200e-003**	**1.0000e-005**	**1.5400e-003**	**1.0000e-005**	**1.5500e-003**	**4.1000e-004**	**1.0000e-005**	**4.2000e-004**	**0.0000**	**1.2076**	**1.2076**	**3.0000e-005**	**3.0000e-005**	**1.2184**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	9.6700e-003	0.0935	0.1320	2.0000e-004		4.6300e-003	4.6300e-003		4.2700e-003	4.2700e-003	0.0000	17.6586	17.6586	5.6000e-003	0.0000	17.7986
Paving	2.9000e-004					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**9.9600e-003**	**0.0935**	**0.1320**	**2.0000e-004**		**4.6300e-003**	**4.6300e-003**		**4.2700e-003**	**4.2700e-003**	**0.0000**	**17.6586**	**17.6586**	**5.6000e-003**	**0.0000**	**17.7986**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.6 Paving - 2023

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	5.0000e-004	3.4000e-004	4.3200e-003	1.0000e-005	1.5400e-003	1.0000e-005	1.5500e-003	4.1000e-004	1.0000e-005	4.2000e-004	0.0000	1.2076	1.2076	3.0000e-005	3.0000e-005	1.2184
Total	**5.0000e-004**	**3.4000e-004**	**4.3200e-003**	**1.0000e-005**	**1.5400e-003**	**1.0000e-005**	**1.5500e-003**	**4.1000e-004**	**1.0000e-005**	**4.2000e-004**	**0.0000**	**1.2076**	**1.2076**	**3.0000e-005**	**3.0000e-005**	**1.2184**

3.7 Architectural Coating - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Archit. Coating	0.0565					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	3.8300e-003	0.0261	0.0362	6.0000e-005		1.4200e-003	1.4200e-003		1.4200e-003	1.4200e-003	0.0000	5.1065	5.1065	3.1000e-004	0.0000	5.1142
Total	**0.0604**	**0.0261**	**0.0362**	**6.0000e-005**		**1.4200e-003**	**1.4200e-003**		**1.4200e-003**	**1.4200e-003**	**0.0000**	**5.1065**	**5.1065**	**3.1000e-004**	**0.0000**	**5.1142**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.7 Architectural Coating - 2023

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	5.6000e-004	3.9000e-004	4.8800e-003	1.0000e-005	1.7400e-003	1.0000e-005	1.7500e-003	4.6000e-004	1.0000e-005	4.7000e-004	0.0000	1.3625	1.3625	4.0000e-005	4.0000e-005	1.3746
Total	**5.6000e-004**	**3.9000e-004**	**4.8800e-003**	**1.0000e-005**	**1.7400e-003**	**1.0000e-005**	**1.7500e-003**	**4.6000e-004**	**1.0000e-005**	**4.7000e-004**	**0.0000**	**1.3625**	**1.3625**	**4.0000e-005**	**4.0000e-005**	**1.3746**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Archit. Coating	0.0565					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	3.8300e-003	0.0261	0.0362	6.0000e-005		1.4200e-003	1.4200e-003		1.4200e-003	1.4200e-003	0.0000	5.1065	5.1065	3.1000e-004	0.0000	5.1141
Total	**0.0604**	**0.0261**	**0.0362**	**6.0000e-005**		**1.4200e-003**	**1.4200e-003**		**1.4200e-003**	**1.4200e-003**	**0.0000**	**5.1065**	**5.1065**	**3.1000e-004**	**0.0000**	**5.1141**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.7 Architectural Coating - 2023

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	5.6000e-004	3.9000e-004	4.8800e-003	1.0000e-005	1.7400e-003	1.0000e-005	1.7500e-003	4.6000e-004	1.0000e-005	4.7000e-004	0.0000	1.3625	1.3625	4.0000e-005	4.0000e-005	1.3746
Total	**5.6000e-004**	**3.9000e-004**	**4.8800e-003**	**1.0000e-005**	**1.7400e-003**	**1.0000e-005**	**1.7500e-003**	**4.6000e-004**	**1.0000e-005**	**4.7000e-004**	**0.0000**	**1.3625**	**1.3625**	**4.0000e-005**	**4.0000e-005**	**1.3746**

3.7 Architectural Coating - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Archit. Coating	0.3703					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0237	0.1597	0.2371	3.9000e-004		7.9800e-003	7.9800e-003		7.9800e-003	7.9800e-003	0.0000	33.4476	33.4476	1.8800e-003	0.0000	33.4947
Total	**0.3940**	**0.1597**	**0.2371**	**3.9000e-004**		**7.9800e-003**	**7.9800e-003**		**7.9800e-003**	**7.9800e-003**	**0.0000**	**33.4476**	**33.4476**	**1.8800e-003**	**0.0000**	**33.4947**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.7 Architectural Coating - 2024

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	3.4500e-003	2.2500e-003	0.0299	9.0000e-005	0.0114	6.0000e-005	0.0114	3.0300e-003	5.0000e-005	3.0800e-003	0.0000	8.7040	8.7040	2.3000e-004	2.3000e-004	8.7778
Total	**3.4500e-003**	**2.2500e-003**	**0.0299**	**9.0000e-005**	**0.0114**	**6.0000e-005**	**0.0114**	**3.0300e-003**	**5.0000e-005**	**3.0800e-003**	**0.0000**	**8.7040**	**8.7040**	**2.3000e-004**	**2.3000e-004**	**8.7778**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Archit. Coating	0.3703					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0237	0.1597	0.2371	3.9000e-004		7.9800e-003	7.9800e-003		7.9800e-003	7.9800e-003	0.0000	33.4476	33.4476	1.8800e-003	0.0000	33.4947
Total	**0.3940**	**0.1597**	**0.2371**	**3.9000e-004**		**7.9800e-003**	**7.9800e-003**		**7.9800e-003**	**7.9800e-003**	**0.0000**	**33.4476**	**33.4476**	**1.8800e-003**	**0.0000**	**33.4947**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.7 Architectural Coating - 2024

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	3.4500e-003	2.2500e-003	0.0299	9.0000e-005	0.0114	6.0000e-005	0.0114	3.0300e-003	5.0000e-005	3.0800e-003	0.0000	8.7040	8.7040	2.3000e-004	2.3000e-004	8.7778
Total	**3.4500e-003**	**2.2500e-003**	**0.0299**	**9.0000e-005**	**0.0114**	**6.0000e-005**	**0.0114**	**3.0300e-003**	**5.0000e-005**	**3.0800e-003**	**0.0000**	**8.7040**	**8.7040**	**2.3000e-004**	**2.3000e-004**	**8.7778**

3.7 Architectural Coating - 2025

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Archit. Coating	0.0961					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	5.8100e-003	0.0390	0.0615	1.0000e-004		1.7500e-003	1.7500e-003		1.7500e-003	1.7500e-003	0.0000	8.6811	8.6811	4.7000e-004	0.0000	8.6929
Total	**0.1019**	**0.0390**	**0.0615**	**1.0000e-004**		**1.7500e-003**	**1.7500e-003**		**1.7500e-003**	**1.7500e-003**	**0.0000**	**8.6811**	**8.6811**	**4.7000e-004**	**0.0000**	**8.6929**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.7 Architectural Coating - 2025

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	8.4000e-004	5.3000e-004	7.2800e-003	2.0000e-005	2.9600e-003	1.0000e-005	2.9700e-003	7.9000e-004	1.0000e-005	8.0000e-004	0.0000	2.2051	2.2051	5.0000e-005	6.0000e-005	2.2230
Total	**8.4000e-004**	**5.3000e-004**	**7.2800e-003**	**2.0000e-005**	**2.9600e-003**	**1.0000e-005**	**2.9700e-003**	**7.9000e-004**	**1.0000e-005**	**8.0000e-004**	**0.0000**	**2.2051**	**2.2051**	**5.0000e-005**	**6.0000e-005**	**2.2230**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Archit. Coating	0.0961					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	5.8100e-003	0.0390	0.0615	1.0000e-004		1.7500e-003	1.7500e-003		1.7500e-003	1.7500e-003	0.0000	8.6811	8.6811	4.7000e-004	0.0000	8.6929
Total	**0.1019**	**0.0390**	**0.0615**	**1.0000e-004**		**1.7500e-003**	**1.7500e-003**		**1.7500e-003**	**1.7500e-003**	**0.0000**	**8.6811**	**8.6811**	**4.7000e-004**	**0.0000**	**8.6929**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.7 Architectural Coating - 2025

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	8.4000e-004	5.3000e-004	7.2800e-003	2.0000e-005	2.9600e-003	1.0000e-005	2.9700e-003	7.9000e-004	1.0000e-005	8.0000e-004	0.0000	2.2051	2.2051	5.0000e-005	6.0000e-005	2.2230
Total	**8.4000e-004**	**5.3000e-004**	**7.2800e-003**	**2.0000e-005**	**2.9600e-003**	**1.0000e-005**	**2.9700e-003**	**7.9000e-004**	**1.0000e-005**	**8.0000e-004**	**0.0000**	**2.2051**	**2.2051**	**5.0000e-005**	**6.0000e-005**	**2.2230**

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

Increase Transit Accessibility

Improve Pedestrian Network

Drake Avenue Apartments - Bay Area AQMD Air District, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	0.1446	0.1546	1.2960	2.6100e-003	0.2873	1.9600e-003	0.2893	0.0768	1.8200e-003	0.0786	0.0000	246.6374	246.6374	0.0168	0.0122	250.6835
Unmitigated	0.1527	0.1695	1.4188	2.9400e-003	0.3258	2.1800e-003	0.3280	0.0870	2.0300e-003	0.0891	0.0000	278.4389	278.4389	0.0181	0.0133	282.8602

4.2 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Apartments Mid Rise	402.56	363.34	302.66	883,854	779,559
Parking Lot	0.00	0.00	0.00		
Total	402.56	363.34	302.66	883,854	779,559

4.3 Trip Type Information

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Apartments Mid Rise	10.80	4.80	5.70	31.00	15.00	54.00	86	11	3
Parking Lot	9.50	7.30	7.30	0.00	0.00	0.00	0	0	0

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Apartments Mid Rise	0.553839	0.058700	0.188468	0.120786	0.022796	0.005663	0.010629	0.007566	0.000983	0.000556	0.026354	0.000841	0.002820
Parking Lot	0.553839	0.058700	0.188468	0.120786	0.022796	0.005663	0.010629	0.007566	0.000983	0.000556	0.026354	0.000841	0.002820

5.0 Energy Detail

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

Historical Energy Use: N

5.1 Mitigation Measures Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Electricity Mitigated						0.0000	0.0000		0.0000	0.0000	0.0000	26.9199	26.9199	4.3600e-003	5.3000e-004	27.1861
Electricity Unmitigated						0.0000	0.0000		0.0000	0.0000	0.0000	26.9199	26.9199	4.3600e-003	5.3000e-004	27.1861
NaturalGas Mitigated	3.3700e-003	0.0288	0.0123	1.8000e-004		2.3300e-003	2.3300e-003		2.3300e-003	2.3300e-003	0.0000	33.3408	33.3408	6.4000e-004	6.1000e-004	33.5389
NaturalGas Unmitigated	3.3700e-003	0.0288	0.0123	1.8000e-004		2.3300e-003	2.3300e-003		2.3300e-003	2.3300e-003	0.0000	33.3408	33.3408	6.4000e-004	6.1000e-004	33.5389

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
Apartments Mid Rise	624783	3.3700e-003	0.0288	0.0123	1.8000e-004		2.3300e-003	2.3300e-003		2.3300e-003	2.3300e-003	0.0000	33.3408	33.3408	6.4000e-004	6.1000e-004	33.5389
Parking Lot	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total		**3.3700e-003**	**0.0288**	**0.0123**	**1.8000e-004**		**2.3300e-003**	**2.3300e-003**		**2.3300e-003**	**2.3300e-003**	**0.0000**	**33.3408**	**33.3408**	**6.4000e-004**	**6.1000e-004**	**33.5389**

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
Apartments Mid Rise	624783	3.3700e-003	0.0288	0.0123	1.8000e-004		2.3300e-003	2.3300e-003		2.3300e-003	2.3300e-003	0.0000	33.3408	33.3408	6.4000e-004	6.1000e-004	33.5389
Parking Lot	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total		**3.3700e-003**	**0.0288**	**0.0123**	**1.8000e-004**		**2.3300e-003**	**2.3300e-003**		**2.3300e-003**	**2.3300e-003**	**0.0000**	**33.3408**	**33.3408**	**6.4000e-004**	**6.1000e-004**	**33.5389**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

5.3 Energy by Land Use - Electricity

Unmitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Apartments Mid Rise	287591	26.6090	4.3000e-003	5.2000e-004	26.8722
Parking Lot	3360	0.3109	5.0000e-005	1.0000e-005	0.3140
Total		**26.9199**	**4.3500e-003**	**5.3000e-004**	**27.1861**

Mitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Apartments Mid Rise	287591	26.6090	4.3000e-003	5.2000e-004	26.8722
Parking Lot	3360	0.3109	5.0000e-005	1.0000e-005	0.3140
Total		**26.9199**	**4.3500e-003**	**5.3000e-004**	**27.1861**

6.0 Area Detail

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

6.1 Mitigation Measures Area

No Hearths Installed

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	0.3584	6.3300e-003	0.5492	3.0000e-005		3.0500e-003	3.0500e-003		3.0500e-003	3.0500e-003	0.0000	0.8980	0.8980	8.6000e-004	0.0000	0.9195
Unmitigated	0.5292	0.0103	0.7843	5.0000e-004		0.0367	0.0367		0.0367	0.0367	3.3736	2.2837	5.6573	6.2800e-003	2.2000e-004	5.8803

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.0523					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	0.2896					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Hearth	0.1707	3.9300e-003	0.2351	4.7000e-004		0.0336	0.0336		0.0336	0.0336	3.3736	1.3857	4.7594	5.4200e-003	2.2000e-004	4.9608
Landscaping	0.0165	6.3300e-003	0.5492	3.0000e-005		3.0500e-003	3.0500e-003		3.0500e-003	3.0500e-003	0.0000	0.8980	0.8980	8.6000e-004	0.0000	0.9195
Total	**0.5292**	**0.0103**	**0.7843**	**5.0000e-004**		**0.0367**	**0.0367**		**0.0367**	**0.0367**	**3.3736**	**2.2837**	**5.6573**	**6.2800e-003**	**2.2000e-004**	**5.8803**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

6.2 Area by SubCategory

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.0523					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	0.2896					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Hearth	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	0.0165	6.3300e-003	0.5492	3.0000e-005		3.0500e-003	3.0500e-003		3.0500e-003	3.0500e-003	0.0000	0.8980	0.8980	8.6000e-004	0.0000	0.9195
Total	**0.3584**	**6.3300e-003**	**0.5492**	**3.0000e-005**		**3.0500e-003**	**3.0500e-003**		**3.0500e-003**	**3.0500e-003**	**0.0000**	**0.8980**	**0.8980**	**8.6000e-004**	**0.0000**	**0.9195**

7.0 Water Detail

7.1 Mitigation Measures Water

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

	Total CO2	CH4	N2O	CO2e
Category	MT/yr			
Mitigated	4.9277	0.1577	3.7800e-003	9.9944
Unmitigated	4.9277	0.1577	3.7800e-003	9.9944

7.2 Water by Land Use

Unmitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Apartments Mid Rise	4.8214 / 3.03958	4.9277	0.1577	3.7800e-003	9.9944
Parking Lot	0 / 0	0.0000	0.0000	0.0000	0.0000
Total		**4.9277**	**0.1577**	**3.7800e-003**	**9.9944**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

7.2 Water by Land Use

Mitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Apartments Mid Rise	4.8214 / 3.03958	4.9277	0.1577	3.7800e-003	9.9944
Parking Lot	0 / 0	0.0000	0.0000	0.0000	0.0000
Total		**4.9277**	**0.1577**	**3.7800e-003**	**9.9944**

8.0 Waste Detail

8.1 Mitigation Measures Waste

Category/Year

	Total CO2	CH4	N2O	CO2e
	MT/yr			
Mitigated	6.9098	0.4084	0.0000	17.1188
Unmitigated	6.9098	0.4084	0.0000	17.1188

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

8.2 Waste by Land Use

Unmitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Apartments Mid Rise	34.04	6.9098	0.4084	0.0000	17.1188
Parking Lot	0	0.0000	0.0000	0.0000	0.0000
Total		**6.9098**	**0.4084**	**0.0000**	**17.1188**

Mitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Apartments Mid Rise	34.04	6.9098	0.4084	0.0000	17.1188
Parking Lot	0	0.0000	0.0000	0.0000	0.0000
Total		**6.9098**	**0.4084**	**0.0000**	**17.1188**

9.0 Operational Offroad

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type

10.0 Stationary Equipment

Fire Pumps and Emergency Generators

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type

Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type

User Defined Equipment

Equipment Type	Number

11.0 Vegetation

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

Drake Avenue Apartments

Bay Area AQMD Air District, Summer

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Apartments Mid Rise	74.00	Dwelling Unit	0.79	74,000.00	212
Parking Lot	24.00	Space	0.22	9,600.00	0

1.2 Other Project Characteristics

Urbanization	Urban	**Wind Speed (m/s)**	2.2	**Precipitation Freq (Days)**	64
Climate Zone	5			**Operational Year**	2025
Utility Company	Pacific Gas and Electric Company				
CO2 Intensity (lb/MWhr)	203.98	**CH4 Intensity (lb/MWhr)**	0.033	**N2O Intensity (lb/MWhr)**	0.004

1.3 User Entered Comments & Non-Default Data

Project Characteristics -

Land Use - Lot acreage udpated per site plan.

Construction Phase - Phase timing adjusted per applicant-provided AQ Questionnaire.

Grading -

Demolition -

Area Mitigation -

Mobile Land Use Mitigation - Project would increase transit accessibility, and improve pedestrian network on- and off-site.

Table Name	Column Name	Default Value	New Value
tblConstructionPhase	NumDays	10.00	370.00
tblConstructionPhase	NumDays	200.00	370.00

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

tblConstructionPhase	NumDays	20.00	30.00
tblConstructionPhase	NumDays	4.00	35.00
tblConstructionPhase	NumDays	10.00	30.00
tblConstructionPhase	NumDays	2.00	30.00
tblConstructionPhase	PhaseEndDate	4/8/2024	4/4/2025
tblConstructionPhase	PhaseEndDate	3/11/2024	3/21/2025
tblConstructionPhase	PhaseEndDate	5/26/2023	6/9/2023
tblConstructionPhase	PhaseEndDate	6/5/2023	9/8/2023
tblConstructionPhase	PhaseEndDate	3/25/2024	10/20/2023
tblConstructionPhase	PhaseEndDate	5/30/2023	7/21/2023
tblConstructionPhase	PhaseStartDate	3/26/2024	11/4/2023
tblConstructionPhase	PhaseStartDate	6/6/2023	10/21/2023
tblConstructionPhase	PhaseStartDate	5/31/2023	7/22/2023
tblConstructionPhase	PhaseStartDate	3/12/2024	9/9/2023
tblConstructionPhase	PhaseStartDate	5/27/2023	6/10/2023
tblLandUse	LotAcreage	1.95	0.79

2.0 Emissions Summary

Drake Avenue Apartments - Bay Area AQMD Air District, Summer

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

2.1 Overall Construction (Maximum Daily Emission)

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2023	4.7352	14.4832	16.1710	0.0317	7.1647	0.6775	7.7695	3.4465	0.6336	4.0029	0.0000	2,974.5652	2,974.5652	0.6473	0.0407	2,996.0227
2024	4.6087	12.7632	15.9630	0.0315	0.6196	0.5165	1.1361	0.1657	0.5004	0.6661	0.0000	2,959.3495	2,959.3495	0.3645	0.0394	2,980.2154
2025	4.4927	12.0280	15.7869	0.0313	0.6196	0.4489	1.0684	0.1657	0.4346	0.6003	0.0000	2,944.5423	2,944.5423	0.3565	0.0382	2,964.8480
Maximum	**4.7352**	**14.4832**	**16.1710**	**0.0317**	**7.1647**	**0.6775**	**7.7695**	**3.4465**	**0.6336**	**4.0029**	**0.0000**	**2,974.5652**	**2,974.5652**	**0.6473**	**0.0407**	**2,996.0227**

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2023	4.7352	14.4832	16.1710	0.0317	7.1647	0.6775	7.7695	3.4465	0.6336	4.0029	0.0000	2,974.5652	2,974.5652	0.6473	0.0407	2,996.0227
2024	4.6087	12.7632	15.9630	0.0315	0.6196	0.5165	1.1361	0.1657	0.5004	0.6661	0.0000	2,959.3495	2,959.3495	0.3645	0.0394	2,980.2154
2025	4.4927	12.0280	15.7869	0.0313	0.6196	0.4489	1.0684	0.1657	0.4346	0.6003	0.0000	2,944.5423	2,944.5423	0.3565	0.0382	2,964.8480
Maximum	**4.7352**	**14.4832**	**16.1710**	**0.0317**	**7.1647**	**0.6775**	**7.7695**	**3.4465**	**0.6336**	**4.0029**	**0.0000**	**2,974.5652**	**2,974.5652**	**0.6473**	**0.0407**	**2,996.0227**

Drake Avenue Apartments - Bay Area AQMD Air District, Summer

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	32.4901	0.7431	46.3101	0.0778		5.7420	5.7420		5.7420	5.7420	619.4426	285.2334	904.6760	0.8582	0.0438	939.1790
Energy	0.0185	0.1578	0.0671	1.0100e-003		0.0128	0.0128		0.0128	0.0128		201.3804	201.3804	3.8600e-003	3.6900e-003	202.5771
Mobile	0.9845	0.9016	8.1504	0.0179	1.9570	0.0126	1.9696	0.5212	0.0118	0.5330		1,869.4721	1,869.4721	0.1079	0.0806	1,896.1747
Total	**33.4930**	**1.8024**	**54.5276**	**0.0967**	**1.9570**	**5.7674**	**7.7244**	**0.5212**	**5.7665**	**6.2878**	**619.4426**	**2,356.0859**	**2,975.5286**	**0.9700**	**0.1280**	**3,037.9308**

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	2.0569	0.0703	6.1018	3.2000e-004		0.0339	0.0339		0.0339	0.0339	0.0000	10.9981	10.9981	0.0105	0.0000	11.2616
Energy	0.0185	0.1578	0.0671	1.0100e-003		0.0128	0.0128		0.0128	0.0128		201.3804	201.3804	3.8600e-003	3.6900e-003	202.5771
Mobile	0.9384	0.8221	7.3928	0.0159	1.7261	0.0113	1.7374	0.4597	0.0105	0.4703		1,655.4869	1,655.4869	0.0998	0.0735	1,679.8874
Total	**3.0138**	**1.0501**	**13.5617**	**0.0172**	**1.7261**	**0.0579**	**1.7840**	**0.4597**	**0.0571**	**0.5169**	**0.0000**	**1,867.8655**	**1,867.8655**	**0.1142**	**0.0772**	**1,893.7261**

Drake Avenue Apartments - Bay Area AQMD Air District, Summer

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**91.00**	**41.74**	**75.13**	**82.21**	**11.80**	**99.00**	**76.90**	**11.80**	**99.01**	**91.78**	**100.00**	**20.72**	**37.23**	**88.22**	**39.70**	**37.66**

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Demolition	Demolition	5/1/2023	6/9/2023	5	30	
2	Site Preparation	Site Preparation	6/10/2023	7/21/2023	5	30	
3	Grading	Grading	7/22/2023	9/8/2023	5	35	
4	Building Construction	Building Construction	10/21/2023	3/21/2025	5	370	
5	Paving	Paving	9/9/2023	10/20/2023	5	30	
6	Architectural Coating	Architectural Coating	11/4/2023	4/4/2025	5	370	

Acres of Grading (Site Preparation Phase): 28.13

Acres of Grading (Grading Phase): 35

Acres of Paving: 0.22

Residential Indoor: 149,850; Residential Outdoor: 49,950; Non-Residential Indoor: 0; Non-Residential Outdoor: 0; Striped Parking Area: 576 (Architectural Coating – sqft)

OffRoad Equipment

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Architectural Coating	Air Compressors	1	6.00	78	0.48
Paving	Cement and Mortar Mixers	1	6.00	9	0.56
Demolition	Concrete/Industrial Saws	1	8.00	81	0.73
Building Construction	Cranes	1	6.00	231	0.29
Building Construction	Forklifts	1	6.00	89	0.20

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

Building Construction	Generator Sets	1	8.00	84	0.74
Grading	Graders	1	8.00	187	0.41
Site Preparation	Graders	1	8.00	187	0.41
Paving	Pavers	1	6.00	130	0.42
Paving	Paving Equipment	1	8.00	132	0.36
Paving	Rollers	1	7.00	80	0.38
Demolition	Rubber Tired Dozers	1	8.00	247	0.40
Grading	Rubber Tired Dozers	1	8.00	247	0.40
Site Preparation	Rubber Tired Dozers	1	7.00	247	0.40
Building Construction	Tractors/Loaders/Backhoes	1	6.00	97	0.37
Demolition	Tractors/Loaders/Backhoes	3	8.00	97	0.37
Grading	Tractors/Loaders/Backhoes	2	7.00	97	0.37
Paving	Tractors/Loaders/Backhoes	1	8.00	97	0.37
Site Preparation	Tractors/Loaders/Backhoes	1	8.00	97	0.37
Building Construction	Welders	3	8.00	46	0.45

Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Demolition	5	13.00	0.00	10.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Site Preparation	3	8.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Grading	4	10.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	7	57.00	9.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Paving	5	13.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	1	11.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.2 Demolition - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					0.0697	0.0000	0.0697	0.0106	0.0000	0.0106			0.0000			0.0000
Off-Road	1.4725	14.3184	13.4577	0.0241		0.6766	0.6766		0.6328	0.6328		2,324.3959	2,324.3959	0.5893		2,339.1278
Total	**1.4725**	**14.3184**	**13.4577**	**0.0241**	**0.0697**	**0.6766**	**0.7464**	**0.0106**	**0.6328**	**0.6433**		**2,324.3959**	**2,324.3959**	**0.5893**		**2,339.1278**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	7.1000e-004	0.0436	0.0106	2.0000e-004	5.8300e-003	3.7000e-004	6.2000e-003	1.6000e-003	3.5000e-004	1.9500e-003		21.9197	21.9197	7.2000e-004	3.4700e-003	22.9729
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0352	0.0202	0.3108	9.3000e-004	0.1068	5.3000e-004	0.1073	0.0283	4.9000e-004	0.0288		94.7498	94.7498	2.3900e-003	2.2500e-003	95.4794
Total	**0.0359**	**0.0638**	**0.3214**	**1.1300e-003**	**0.1126**	**9.0000e-004**	**0.1135**	**0.0299**	**8.4000e-004**	**0.0308**		**116.6696**	**116.6696**	**3.1100e-003**	**5.7200e-003**	**118.4523**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.2 Demolition - 2023

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					0.0697	0.0000	0.0697	0.0106	0.0000	0.0106			0.0000			0.0000
Off-Road	1.4725	14.3184	13.4577	0.0241		0.6766	0.6766		0.6328	0.6328	0.0000	2,324.3959	2,324.3959	0.5893		2,339.1278
Total	**1.4725**	**14.3184**	**13.4577**	**0.0241**	**0.0697**	**0.6766**	**0.7464**	**0.0106**	**0.6328**	**0.6433**	**0.0000**	**2,324.3959**	**2,324.3959**	**0.5893**		**2,339.1278**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	7.1000e-004	0.0436	0.0106	2.0000e-004	5.8300e-003	3.7000e-004	6.2000e-003	1.6000e-003	3.5000e-004	1.9500e-003		21.9197	21.9197	7.2000e-004	3.4700e-003	22.9729
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0352	0.0202	0.3108	9.3000e-004	0.1068	5.3000e-004	0.1073	0.0283	4.9000e-004	0.0288		94.7498	94.7498	2.3900e-003	2.2500e-003	95.4794
Total	**0.0359**	**0.0638**	**0.3214**	**1.1300e-003**	**0.1126**	**9.0000e-004**	**0.1135**	**0.0299**	**8.4000e-004**	**0.0308**		**116.6696**	**116.6696**	**3.1100e-003**	**5.7200e-003**	**118.4523**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.3 Site Preparation - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					6.2637	0.0000	6.2637	3.0038	0.0000	3.0038			0.0000			0.0000
Off-Road	1.1339	12.4250	6.6420	0.0172		0.5074	0.5074		0.4668	0.4668		1,666.0573	1,666.0573	0.5388		1,679.5282
Total	**1.1339**	**12.4250**	**6.6420**	**0.0172**	**6.2637**	**0.5074**	**6.7711**	**3.0038**	**0.4668**	**3.4706**		**1,666.0573**	**1,666.0573**	**0.5388**		**1,679.5282**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0216	0.0124	0.1912	5.7000e-004	0.0657	3.3000e-004	0.0660	0.0174	3.0000e-004	0.0177		58.3076	58.3076	1.4700e-003	1.3800e-003	58.7566
Total	**0.0216**	**0.0124**	**0.1912**	**5.7000e-004**	**0.0657**	**3.3000e-004**	**0.0660**	**0.0174**	**3.0000e-004**	**0.0177**		**58.3076**	**58.3076**	**1.4700e-003**	**1.3800e-003**	**58.7566**

Drake Avenue Apartments - Bay Area AQMD Air District, Summer

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.3 Site Preparation - 2023

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					6.2637	0.0000	6.2637	3.0038	0.0000	3.0038			0.0000			0.0000
Off-Road	1.1339	12.4250	6.6420	0.0172		0.5074	0.5074		0.4668	0.4668	0.0000	1,666.0573	1,666.0573	0.5388		1,679.5282
Total	**1.1339**	**12.4250**	**6.6420**	**0.0172**	**6.2637**	**0.5074**	**6.7711**	**3.0038**	**0.4668**	**3.4706**	**0.0000**	**1,666.0573**	**1,666.0573**	**0.5388**		**1,679.5282**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0216	0.0124	0.1912	5.7000e-004	0.0657	3.3000e-004	0.0660	0.0174	3.0000e-004	0.0177		58.3076	58.3076	1.4700e-003	1.3800e-003	58.7566
Total	**0.0216**	**0.0124**	**0.1912**	**5.7000e-004**	**0.0657**	**3.3000e-004**	**0.0660**	**0.0174**	**3.0000e-004**	**0.0177**		**58.3076**	**58.3076**	**1.4700e-003**	**1.3800e-003**	**58.7566**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.4 Grading - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					7.0826	0.0000	7.0826	3.4247	0.0000	3.4247			0.0000			0.0000
Off-Road	1.3330	14.4676	8.7038	0.0206		0.6044	0.6044		0.5560	0.5560		1,995.6147	1,995.6147	0.6454		2,011.7503
Total	**1.3330**	**14.4676**	**8.7038**	**0.0206**	**7.0826**	**0.6044**	**7.6869**	**3.4247**	**0.5560**	**3.9807**		**1,995.6147**	**1,995.6147**	**0.6454**		**2,011.7503**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0271	0.0155	0.2391	7.1000e-004	0.0822	4.1000e-004	0.0826	0.0218	3.8000e-004	0.0222		72.8845	72.8845	1.8400e-003	1.7300e-003	73.4457
Total	**0.0271**	**0.0155**	**0.2391**	**7.1000e-004**	**0.0822**	**4.1000e-004**	**0.0826**	**0.0218**	**3.8000e-004**	**0.0222**		**72.8845**	**72.8845**	**1.8400e-003**	**1.7300e-003**	**73.4457**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.4 Grading - 2023

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					7.0826	0.0000	7.0826	3.4247	0.0000	3.4247			0.0000			0.0000
Off-Road	1.3330	14.4676	8.7038	0.0206		0.6044	0.6044		0.5560	0.5560	0.0000	1,995.6147	1,995.6147	0.6454		2,011.7503
Total	**1.3330**	**14.4676**	**8.7038**	**0.0206**	**7.0826**	**0.6044**	**7.6869**	**3.4247**	**0.5560**	**3.9807**	**0.0000**	**1,995.6147**	**1,995.6147**	**0.6454**		**2,011.7503**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0271	0.0155	0.2391	7.1000e-004	0.0822	4.1000e-004	0.0826	0.0218	3.8000e-004	0.0222		72.8845	72.8845	1.8400e-003	1.7300e-003	73.4457
Total	**0.0271**	**0.0155**	**0.2391**	**7.1000e-004**	**0.0822**	**4.1000e-004**	**0.0826**	**0.0218**	**3.8000e-004**	**0.0222**		**72.8845**	**72.8845**	**1.8400e-003**	**1.7300e-003**	**73.4457**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.5 Building Construction - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.5233	11.7104	12.6111	0.0221		0.5145	0.5145		0.4968	0.4968		2,001.7877	2,001.7877	0.3399		2,010.2858
Total	**1.5233**	**11.7104**	**12.6111**	**0.0221**		**0.5145**	**0.5145**		**0.4968**	**0.4968**		**2,001.7877**	**2,001.7877**	**0.3399**		**2,010.2858**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	9.7900e-003	0.3860	0.1233	1.8200e-003	0.0610	2.3400e-003	0.0633	0.0176	2.2400e-003	0.0198		195.7149	195.7149	4.0100e-003	0.0289	204.4370
Worker	0.1542	0.0886	1.3626	4.0600e-003	0.4682	2.3200e-003	0.4706	0.1242	2.1400e-003	0.1263		415.4416	415.4416	0.0105	9.8600e-003	418.6406
Total	**0.1640**	**0.4746**	**1.4859**	**5.8800e-003**	**0.5292**	**4.6600e-003**	**0.5339**	**0.1418**	**4.3800e-003**	**0.1461**		**611.1565**	**611.1565**	**0.0145**	**0.0388**	**623.0777**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.5 Building Construction - 2023

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.5233	11.7104	12.6111	0.0221		0.5145	0.5145		0.4968	0.4968	0.0000	2,001.7877	2,001.7877	0.3399		2,010.2858
Total	**1.5233**	**11.7104**	**12.6111**	**0.0221**		**0.5145**	**0.5145**		**0.4968**	**0.4968**	**0.0000**	**2,001.7877**	**2,001.7877**	**0.3399**		**2,010.2858**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	9.7900e-003	0.3860	0.1233	1.8200e-003	0.0610	2.3400e-003	0.0633	0.0176	2.2400e-003	0.0198		195.7149	195.7149	4.0100e-003	0.0289	204.4370
Worker	0.1542	0.0886	1.3626	4.0600e-003	0.4682	2.3200e-003	0.4706	0.1242	2.1400e-003	0.1263		415.4416	415.4416	0.0105	9.8600e-003	418.6406
Total	**0.1640**	**0.4746**	**1.4859**	**5.8800e-003**	**0.5292**	**4.6600e-003**	**0.5339**	**0.1418**	**4.3800e-003**	**0.1461**		**611.1565**	**611.1565**	**0.0145**	**0.0388**	**623.0777**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.5 Building Construction - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.4200	11.0639	12.5172	0.0221		0.4506	0.4506		0.4348	0.4348		2,001.9214	2,001.9214	0.3334		2,010.2563
Total	**1.4200**	**11.0639**	**12.5172**	**0.0221**		**0.4506**	**0.4506**		**0.4348**	**0.4348**		**2,001.9214**	**2,001.9214**	**0.3334**		**2,010.2563**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	9.5200e-003	0.3862	0.1206	1.8000e-003	0.0610	2.3600e-003	0.0633	0.0176	2.2500e-003	0.0198		192.6625	192.6625	3.9800e-003	0.0285	201.2485
Worker	0.1440	0.0791	1.2700	3.9300e-003	0.4682	2.2100e-003	0.4705	0.1242	2.0400e-003	0.1262		405.1339	405.1339	9.4800e-003	9.1900e-003	408.1086
Total	**0.1535**	**0.4653**	**1.3906**	**5.7300e-003**	**0.5292**	**4.5700e-003**	**0.5338**	**0.1418**	**4.2900e-003**	**0.1460**		**597.7963**	**597.7963**	**0.0135**	**0.0377**	**609.3571**

Drake Avenue Apartments - Bay Area AQMD Air District, Summer

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.5 Building Construction - 2024

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.4200	11.0639	12.5172	0.0221		0.4506	0.4506		0.4348	0.4348	0.0000	2,001.9214	2,001.9214	0.3334		2,010.2563
Total	**1.4200**	**11.0639**	**12.5172**	**0.0221**		**0.4506**	**0.4506**		**0.4348**	**0.4348**	**0.0000**	**2,001.9214**	**2,001.9214**	**0.3334**		**2,010.2563**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	9.5200e-003	0.3862	0.1206	1.8000e-003	0.0610	2.3600e-003	0.0633	0.0176	2.2500e-003	0.0198		192.6625	192.6625	3.9800e-003	0.0285	201.2485
Worker	0.1440	0.0791	1.2700	3.9300e-003	0.4682	2.2100e-003	0.4705	0.1242	2.0400e-003	0.1262		405.1339	405.1339	9.4800e-003	9.1900e-003	408.1086
Total	**0.1535**	**0.4653**	**1.3906**	**5.7300e-003**	**0.5292**	**4.5700e-003**	**0.5338**	**0.1418**	**4.2900e-003**	**0.1460**		**597.7963**	**597.7963**	**0.0135**	**0.0377**	**609.3571**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.5 Building Construction - 2025

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.3246	10.4128	12.4393	0.0221		0.3925	0.3925		0.3785	0.3785		2,002.1524	2,002.1524	0.3269		2,010.3248
Total	**1.3246**	**10.4128**	**12.4393**	**0.0221**		**0.3925**	**0.3925**		**0.3785**	**0.3785**		**2,002.1524**	**2,002.1524**	**0.3269**		**2,010.3248**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	9.2800e-003	0.3848	0.1185	1.7600e-003	0.0610	2.3600e-003	0.0633	0.0176	2.2500e-003	0.0198		189.2337	189.2337	3.9600e-003	0.0280	197.6648
Worker	0.1353	0.0713	1.1902	3.8000e-003	0.4682	2.1200e-003	0.4704	0.1242	1.9500e-003	0.1262		395.4024	395.4024	8.5900e-003	8.6100e-003	398.1841
Total	**0.1446**	**0.4560**	**1.3087**	**5.5600e-003**	**0.5292**	**4.4800e-003**	**0.5337**	**0.1418**	**4.2000e-003**	**0.1460**		**584.6361**	**584.6361**	**0.0126**	**0.0366**	**595.8488**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.5 Building Construction - 2025

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.3246	10.4128	12.4393	0.0221		0.3925	0.3925		0.3785	0.3785	0.0000	2,002.1524	2,002.1524	0.3269		2,010.3248
Total	**1.3246**	**10.4128**	**12.4393**	**0.0221**		**0.3925**	**0.3925**		**0.3785**	**0.3785**	**0.0000**	**2,002.1524**	**2,002.1524**	**0.3269**		**2,010.3248**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	9.2800e-003	0.3848	0.1185	1.7600e-003	0.0610	2.3600e-003	0.0633	0.0176	2.2500e-003	0.0198		189.2337	189.2337	3.9600e-003	0.0280	197.6648
Worker	0.1353	0.0713	1.1902	3.8000e-003	0.4682	2.1200e-003	0.4704	0.1242	1.9500e-003	0.1262		395.4024	395.4024	8.5900e-003	8.6100e-003	398.1841
Total	**0.1446**	**0.4560**	**1.3087**	**5.5600e-003**	**0.5292**	**4.4800e-003**	**0.5337**	**0.1418**	**4.2000e-003**	**0.1460**		**584.6361**	**584.6361**	**0.0126**	**0.0366**	**595.8488**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.6 Paving - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.6446	6.2357	8.8024	0.0136		0.3084	0.3084		0.2846	0.2846		1,297.6880	1,297.6880	0.4114		1,307.9725
Paving	0.0192					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	**0.6638**	**6.2357**	**8.8024**	**0.0136**		**0.3084**	**0.3084**		**0.2846**	**0.2846**		**1,297.6880**	**1,297.6880**	**0.4114**		**1,307.9725**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0352	0.0202	0.3108	9.3000e-004	0.1068	5.3000e-004	0.1073	0.0283	4.9000e-004	0.0288		94.7498	94.7498	2.3900e-003	2.2500e-003	95.4794
Total	**0.0352**	**0.0202**	**0.3108**	**9.3000e-004**	**0.1068**	**5.3000e-004**	**0.1073**	**0.0283**	**4.9000e-004**	**0.0288**		**94.7498**	**94.7498**	**2.3900e-003**	**2.2500e-003**	**95.4794**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.6 Paving - 2023

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.6446	6.2357	8.8024	0.0136		0.3084	0.3084		0.2846	0.2846	0.0000	1,297.6880	1,297.6880	0.4114		1,307.9725
Paving	0.0192					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	**0.6638**	**6.2357**	**8.8024**	**0.0136**		**0.3084**	**0.3084**		**0.2846**	**0.2846**	**0.0000**	**1,297.6880**	**1,297.6880**	**0.4114**		**1,307.9725**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0352	0.0202	0.3108	9.3000e-004	0.1068	5.3000e-004	0.1073	0.0283	4.9000e-004	0.0288		94.7498	94.7498	2.3900e-003	2.2500e-003	95.4794
Total	**0.0352**	**0.0202**	**0.3108**	**9.3000e-004**	**0.1068**	**5.3000e-004**	**0.1073**	**0.0283**	**4.9000e-004**	**0.0288**		**94.7498**	**94.7498**	**2.3900e-003**	**2.2500e-003**	**95.4794**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.7 Architectural Coating - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	2.8266					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.1917	1.3030	1.8111	2.9700e-003		0.0708	0.0708		0.0708	0.0708		281.4481	281.4481	0.0168		281.8690
Total	**3.0183**	**1.3030**	**1.8111**	**2.9700e-003**		**0.0708**	**0.0708**		**0.0708**	**0.0708**		**281.4481**	**281.4481**	**0.0168**		**281.8690**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0298	0.0171	0.2630	7.8000e-004	0.0904	4.5000e-004	0.0908	0.0240	4.1000e-004	0.0244		80.1729	80.1729	2.0200e-003	1.9000e-003	80.7903
Total	**0.0298**	**0.0171**	**0.2630**	**7.8000e-004**	**0.0904**	**4.5000e-004**	**0.0908**	**0.0240**	**4.1000e-004**	**0.0244**		**80.1729**	**80.1729**	**2.0200e-003**	**1.9000e-003**	**80.7903**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.7 Architectural Coating - 2023

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	2.8266					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.1917	1.3030	1.8111	2.9700e-003		0.0708	0.0708		0.0708	0.0708	0.0000	281.4481	281.4481	0.0168		281.8690
Total	**3.0183**	**1.3030**	**1.8111**	**2.9700e-003**		**0.0708**	**0.0708**		**0.0708**	**0.0708**	**0.0000**	**281.4481**	**281.4481**	**0.0168**		**281.8690**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0298	0.0171	0.2630	7.8000e-004	0.0904	4.5000e-004	0.0908	0.0240	4.1000e-004	0.0244		80.1729	80.1729	2.0200e-003	1.9000e-003	80.7903
Total	**0.0298**	**0.0171**	**0.2630**	**7.8000e-004**	**0.0904**	**4.5000e-004**	**0.0908**	**0.0240**	**4.1000e-004**	**0.0244**		**80.1729**	**80.1729**	**2.0200e-003**	**1.9000e-003**	**80.7903**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.7 Architectural Coating - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	2.8266					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.1808	1.2188	1.8101	2.9700e-003		0.0609	0.0609		0.0609	0.0609		281.4481	281.4481	0.0159		281.8443
Total	**3.0074**	**1.2188**	**1.8101**	**2.9700e-003**		**0.0609**	**0.0609**		**0.0609**	**0.0609**		**281.4481**	**281.4481**	**0.0159**		**281.8443**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0278	0.0153	0.2451	7.6000e-004	0.0904	4.3000e-004	0.0908	0.0240	3.9000e-004	0.0244		78.1837	78.1837	1.8300e-003	1.7700e-003	78.7578
Total	**0.0278**	**0.0153**	**0.2451**	**7.6000e-004**	**0.0904**	**4.3000e-004**	**0.0908**	**0.0240**	**3.9000e-004**	**0.0244**		**78.1837**	**78.1837**	**1.8300e-003**	**1.7700e-003**	**78.7578**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.7 Architectural Coating - 2024

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	2.8266					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.1808	1.2188	1.8101	2.9700e-003		0.0609	0.0609		0.0609	0.0609	0.0000	281.4481	281.4481	0.0159		281.8443
Total	**3.0074**	**1.2188**	**1.8101**	**2.9700e-003**		**0.0609**	**0.0609**		**0.0609**	**0.0609**	**0.0000**	**281.4481**	**281.4481**	**0.0159**		**281.8443**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0278	0.0153	0.2451	7.6000e-004	0.0904	4.3000e-004	0.0908	0.0240	3.9000e-004	0.0244		78.1837	78.1837	1.8300e-003	1.7700e-003	78.7578
Total	**0.0278**	**0.0153**	**0.2451**	**7.6000e-004**	**0.0904**	**4.3000e-004**	**0.0908**	**0.0240**	**3.9000e-004**	**0.0244**		**78.1837**	**78.1837**	**1.8300e-003**	**1.7700e-003**	**78.7578**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.7 Architectural Coating - 2025

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	2.8266					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.1709	1.1455	1.8091	2.9700e-003		0.0515	0.0515		0.0515	0.0515		281.4481	281.4481	0.0154		281.8319
Total	**2.9975**	**1.1455**	**1.8091**	**2.9700e-003**		**0.0515**	**0.0515**		**0.0515**	**0.0515**		**281.4481**	**281.4481**	**0.0154**		**281.8319**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0261	0.0138	0.2297	7.3000e-004	0.0904	4.1000e-004	0.0908	0.0240	3.8000e-004	0.0243		76.3057	76.3057	1.6600e-003	1.6600e-003	76.8425
Total	**0.0261**	**0.0138**	**0.2297**	**7.3000e-004**	**0.0904**	**4.1000e-004**	**0.0908**	**0.0240**	**3.8000e-004**	**0.0243**		**76.3057**	**76.3057**	**1.6600e-003**	**1.6600e-003**	**76.8425**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.7 Architectural Coating - 2025

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	2.8266					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.1709	1.1455	1.8091	2.9700e-003		0.0515	0.0515		0.0515	0.0515	0.0000	281.4481	281.4481	0.0154		281.8319
Total	**2.9975**	**1.1455**	**1.8091**	**2.9700e-003**		**0.0515**	**0.0515**		**0.0515**	**0.0515**	**0.0000**	**281.4481**	**281.4481**	**0.0154**		**281.8319**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0261	0.0138	0.2297	7.3000e-004	0.0904	4.1000e-004	0.0908	0.0240	3.8000e-004	0.0243		76.3057	76.3057	1.6600e-003	1.6600e-003	76.8425
Total	**0.0261**	**0.0138**	**0.2297**	**7.3000e-004**	**0.0904**	**4.1000e-004**	**0.0908**	**0.0240**	**3.8000e-004**	**0.0243**		**76.3057**	**76.3057**	**1.6600e-003**	**1.6600e-003**	**76.8425**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

Increase Transit Accessibility

Improve Pedestrian Network

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	0.9384	0.8221	7.3928	0.0159	1.7261	0.0113	1.7374	0.4597	0.0105	0.4703		1,655.4869	1,655.4869	0.0998	0.0735	1,679.8874
Unmitigated	0.9845	0.9016	8.1504	0.0179	1.9570	0.0126	1.9696	0.5212	0.0118	0.5330		1,869.4721	1,869.4721	0.1079	0.0806	1,896.1747

4.2 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Apartments Mid Rise	402.56	363.34	302.66	883,854	779,559
Parking Lot	0.00	0.00	0.00		
Total	402.56	363.34	302.66	883,854	779,559

4.3 Trip Type Information

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Apartments Mid Rise	10.80	4.80	5.70	31.00	15.00	54.00	86	11	3
Parking Lot	9.50	7.30	7.30	0.00	0.00	0.00	0	0	0

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Apartments Mid Rise	0.553839	0.058700	0.188468	0.120786	0.022796	0.005663	0.010629	0.007566	0.000983	0.000556	0.026354	0.000841	0.002820
Parking Lot	0.553839	0.058700	0.188468	0.120786	0.022796	0.005663	0.010629	0.007566	0.000983	0.000556	0.026354	0.000841	0.002820

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
NaturalGas Mitigated	0.0185	0.1578	0.0671	1.0100e-003		0.0128	0.0128		0.0128	0.0128		201.3804	201.3804	3.8600e-003	3.6900e-003	202.5771
NaturalGas Unmitigated	0.0185	0.1578	0.0671	1.0100e-003		0.0128	0.0128		0.0128	0.0128		201.3804	201.3804	3.8600e-003	3.6900e-003	202.5771

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
Apartments Mid Rise	1711.73	0.0185	0.1578	0.0671	1.0100e-003		0.0128	0.0128		0.0128	0.0128		201.3804	201.3804	3.8600e-003	3.6900e-003	202.5771
Parking Lot	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Total		**0.0185**	**0.1578**	**0.0671**	**1.0100e-003**		**0.0128**	**0.0128**		**0.0128**	**0.0128**		**201.3804**	**201.3804**	**3.8600e-003**	**3.6900e-003**	**202.5771**

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
Apartments Mid Rise	1.71173	0.0185	0.1578	0.0671	1.0100e-003		0.0128	0.0128		0.0128	0.0128		201.3804	201.3804	3.8600e-003	3.6900e-003	202.5771
Parking Lot	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Total		**0.0185**	**0.1578**	**0.0671**	**1.0100e-003**		**0.0128**	**0.0128**		**0.0128**	**0.0128**		**201.3804**	**201.3804**	**3.8600e-003**	**3.6900e-003**	**202.5771**

6.0 Area Detail

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

6.1 Mitigation Measures Area

No Hearths Installed

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	2.0569	0.0703	6.1018	3.2000e-004		0.0339	0.0339		0.0339	0.0339	0.0000	10.9981	10.9981	0.0105	0.0000	11.2616
Unmitigated	32.4901	0.7431	46.3101	0.0778		5.7420	5.7420		5.7420	5.7420	619.4426	285.2334	904.6760	0.8582	0.0438	939.1790

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	0.2865					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	1.5870					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Hearth	30.4333	0.6728	40.2083	0.0775		5.7082	5.7082		5.7082	5.7082	619.4426	274.2353	893.6779	0.8477	0.0438	927.9174
Landscaping	0.1834	0.0703	6.1018	3.2000e-004		0.0339	0.0339		0.0339	0.0339		10.9981	10.9981	0.0105		11.2616
Total	**32.4901**	**0.7431**	**46.3101**	**0.0778**		**5.7420**	**5.7420**		**5.7420**	**5.7420**	**619.4426**	**285.2334**	**904.6760**	**0.8582**	**0.0438**	**939.1790**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

6.2 Area by SubCategory

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	0.2865					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	1.5870					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Hearth	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	0.1834	0.0703	6.1018	3.2000e-004		0.0339	0.0339		0.0339	0.0339		10.9981	10.9981	0.0105		11.2616
Total	**2.0569**	**0.0703**	**6.1018**	**3.2000e-004**		**0.0339**	**0.0339**		**0.0339**	**0.0339**	**0.0000**	**10.9981**	**10.9981**	**0.0105**	**0.0000**	**11.2616**

7.0 Water Detail

7.1 Mitigation Measures Water

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

8.0 Waste Detail

8.1 Mitigation Measures Waste

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type

10.0 Stationary Equipment

Fire Pumps and Emergency Generators

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type

Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type

User Defined Equipment

Equipment Type	Number

11.0 Vegetation

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

Drake Avenue Apartments

Bay Area AQMD Air District, Winter

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Apartments Mid Rise	74.00	Dwelling Unit	0.79	74,000.00	212
Parking Lot	24.00	Space	0.22	9,600.00	0

1.2 Other Project Characteristics

Urbanization	Urban	**Wind Speed (m/s)**	2.2	**Precipitation Freq (Days)**	64
Climate Zone	5			**Operational Year**	2025
Utility Company	Pacific Gas and Electric Company				
CO2 Intensity (lb/MWhr)	203.98	**CH4 Intensity (lb/MWhr)**	0.033	**N2O Intensity (lb/MWhr)**	0.004

1.3 User Entered Comments & Non-Default Data

Project Characteristics -

Land Use - Lot acreage udpated per site plan.

Construction Phase - Phase timing adjusted per applicant-provided AQ Questionnaire.

Grading -

Demolition -

Area Mitigation -

Mobile Land Use Mitigation - Project would increase transit accessibility, and improve pedestrian network on- and off-site.

Table Name	Column Name	Default Value	New Value
tblConstructionPhase	NumDays	10.00	370.00
tblConstructionPhase	NumDays	200.00	370.00

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

tblConstructionPhase	NumDays	20.00	30.00
tblConstructionPhase	NumDays	4.00	35.00
tblConstructionPhase	NumDays	10.00	30.00
tblConstructionPhase	NumDays	2.00	30.00
tblConstructionPhase	PhaseEndDate	4/8/2024	4/4/2025
tblConstructionPhase	PhaseEndDate	3/11/2024	3/21/2025
tblConstructionPhase	PhaseEndDate	5/26/2023	6/9/2023
tblConstructionPhase	PhaseEndDate	6/5/2023	9/8/2023
tblConstructionPhase	PhaseEndDate	3/25/2024	10/20/2023
tblConstructionPhase	PhaseEndDate	5/30/2023	7/21/2023
tblConstructionPhase	PhaseStartDate	3/26/2024	11/4/2023
tblConstructionPhase	PhaseStartDate	6/6/2023	10/21/2023
tblConstructionPhase	PhaseStartDate	5/31/2023	7/22/2023
tblConstructionPhase	PhaseStartDate	3/12/2024	9/9/2023
tblConstructionPhase	PhaseStartDate	5/27/2023	6/10/2023
tblLandUse	LotAcreage	1.95	0.79

2.0 Emissions Summary

Drake Avenue Apartments - Bay Area AQMD Air District, Winter

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

2.1 Overall Construction (Maximum Daily Emission)

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2023	4.7396	14.4868	16.1066	0.0314	7.1647	0.6775	7.7695	3.4465	0.6336	4.0029	0.0000	2,939.7151	2,939.7151	0.6475	0.0426	2,961.7660
2024	4.6134	12.8077	15.9083	0.0312	0.6196	0.5165	1.1361	0.1657	0.5004	0.6661	0.0000	2,925.4453	2,925.4453	0.3661	0.0412	2,946.8631
2025	4.4978	12.0703	15.7397	0.0310	0.6196	0.4489	1.0684	0.1657	0.4346	0.6003	0.0000	2,911.5209	2,911.5209	0.3579	0.0399	2,932.3430
Maximum	**4.7396**	**14.4868**	**16.1066**	**0.0314**	**7.1647**	**0.6775**	**7.7695**	**3.4465**	**0.6336**	**4.0029**	**0.0000**	**2,939.7151**	**2,939.7151**	**0.6475**	**0.0426**	**2,961.7660**

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2023	4.7396	14.4868	16.1066	0.0314	7.1647	0.6775	7.7695	3.4465	0.6336	4.0029	0.0000	2,939.7151	2,939.7151	0.6475	0.0426	2,961.7660
2024	4.6134	12.8077	15.9083	0.0312	0.6196	0.5165	1.1361	0.1657	0.5004	0.6661	0.0000	2,925.4453	2,925.4453	0.3661	0.0412	2,946.8631
2025	4.4978	12.0703	15.7397	0.0310	0.6196	0.4489	1.0684	0.1657	0.4346	0.6003	0.0000	2,911.5209	2,911.5209	0.3579	0.0399	2,932.3430
Maximum	**4.7396**	**14.4868**	**16.1066**	**0.0314**	**7.1647**	**0.6775**	**7.7695**	**3.4465**	**0.6336**	**4.0029**	**0.0000**	**2,939.7151**	**2,939.7151**	**0.6475**	**0.0426**	**2,961.7660**

Drake Avenue Apartments - Bay Area AQMD Air District, Winter

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	32.4901	0.7431	46.3101	0.0778		5.7420	5.7420		5.7420	5.7420	619.4426	285.2334	904.6760	0.8582	0.0438	939.1790
Energy	0.0185	0.1578	0.0671	1.0100e-003		0.0128	0.0128		0.0128	0.0128		201.3804	201.3804	3.8600e-003	3.6900e-003	202.5771
Mobile	0.8833	1.0360	8.7571	0.0169	1.9570	0.0126	1.9696	0.5212	0.0118	0.5330		1,765.7113	1,765.7113	0.1222	0.0882	1,795.0515
Total	**33.3919**	**1.9369**	**55.1343**	**0.0957**	**1.9570**	**5.7674**	**7.7244**	**0.5212**	**5.7665**	**6.2878**	**619.4426**	**2,252.3251**	**2,871.7677**	**0.9843**	**0.1357**	**2,936.8077**

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	2.0569	0.0703	6.1018	3.2000e-004		0.0339	0.0339		0.0339	0.0339	0.0000	10.9981	10.9981	0.0105	0.0000	11.2616
Energy	0.0185	0.1578	0.0671	1.0100e-003		0.0128	0.0128		0.0128	0.0128		201.3804	201.3804	3.8600e-003	3.6900e-003	202.5771
Mobile	0.8349	0.9452	8.0238	0.0150	1.7261	0.0113	1.7374	0.4597	0.0105	0.4703		1,564.1754	1,564.1754	0.1140	0.0806	1,591.0487
Total	**2.9103**	**1.1732**	**14.1927**	**0.0163**	**1.7261**	**0.0579**	**1.7840**	**0.4597**	**0.0571**	**0.5169**	**0.0000**	**1,776.5540**	**1,776.5540**	**0.1284**	**0.0843**	**1,804.8875**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	91.28	39.43	74.26	82.94	11.80	99.00	76.90	11.80	99.01	91.78	100.00	21.12	38.14	86.96	37.86	38.54

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Demolition	Demolition	5/1/2023	6/9/2023	5	30	
2	Site Preparation	Site Preparation	6/10/2023	7/21/2023	5	30	
3	Grading	Grading	7/22/2023	9/8/2023	5	35	
4	Building Construction	Building Construction	10/21/2023	3/21/2025	5	370	
5	Paving	Paving	9/9/2023	10/20/2023	5	30	
6	Architectural Coating	Architectural Coating	11/4/2023	4/4/2025	5	370	

Acres of Grading (Site Preparation Phase): 28.13

Acres of Grading (Grading Phase): 35

Acres of Paving: 0.22

Residential Indoor: 149,850; Residential Outdoor: 49,950; Non-Residential Indoor: 0; Non-Residential Outdoor: 0; Striped Parking Area: 576 (Architectural Coating – sqft)

OffRoad Equipment

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Architectural Coating	Air Compressors	1	6.00	78	0.48
Paving	Cement and Mortar Mixers	1	6.00	9	0.56
Demolition	Concrete/Industrial Saws	1	8.00	81	0.73
Building Construction	Cranes	1	6.00	231	0.29
Building Construction	Forklifts	1	6.00	89	0.20

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

Building Construction	Generator Sets	1	8.00	84	0.74
Grading	Graders	1	8.00	187	0.41
Site Preparation	Graders	1	8.00	187	0.41
Paving	Pavers	1	6.00	130	0.42
Paving	Paving Equipment	1	8.00	132	0.36
Paving	Rollers	1	7.00	80	0.38
Demolition	Rubber Tired Dozers	1	8.00	247	0.40
Grading	Rubber Tired Dozers	1	8.00	247	0.40
Site Preparation	Rubber Tired Dozers	1	7.00	247	0.40
Building Construction	Tractors/Loaders/Backhoes	1	6.00	97	0.37
Demolition	Tractors/Loaders/Backhoes	3	8.00	97	0.37
Grading	Tractors/Loaders/Backhoes	2	7.00	97	0.37
Paving	Tractors/Loaders/Backhoes	1	8.00	97	0.37
Site Preparation	Tractors/Loaders/Backhoes	1	8.00	97	0.37
Building Construction	Welders	3	8.00	46	0.45

Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Demolition	5	13.00	0.00	10.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Site Preparation	3	8.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Grading	4	10.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	7	57.00	9.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Paving	5	13.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	1	11.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.2 Demolition - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					0.0697	0.0000	0.0697	0.0106	0.0000	0.0106			0.0000			0.0000
Off-Road	1.4725	14.3184	13.4577	0.0241		0.6766	0.6766		0.6328	0.6328		2,324.3959	2,324.3959	0.5893		2,339.1278
Total	**1.4725**	**14.3184**	**13.4577**	**0.0241**	**0.0697**	**0.6766**	**0.7464**	**0.0106**	**0.6328**	**0.6433**		**2,324.3959**	**2,324.3959**	**0.5893**		**2,339.1278**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	6.7000e-004	0.0461	0.0107	2.0000e-004	5.8300e-003	3.7000e-004	6.2000e-003	1.6000e-003	3.5000e-004	1.9500e-003		21.9404	21.9404	7.2000e-004	3.4800e-003	22.9945
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0361	0.0249	0.2976	8.6000e-004	0.1068	5.3000e-004	0.1073	0.0283	4.9000e-004	0.0288		88.0338	88.0338	2.7200e-003	2.5900e-003	88.8728
Total	**0.0367**	**0.0710**	**0.3084**	**1.0600e-003**	**0.1126**	**9.0000e-004**	**0.1135**	**0.0299**	**8.4000e-004**	**0.0308**		**109.9742**	**109.9742**	**3.4400e-003**	**6.0700e-003**	**111.8672**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.2 Demolition - 2023

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					0.0697	0.0000	0.0697	0.0106	0.0000	0.0106			0.0000			0.0000
Off-Road	1.4725	14.3184	13.4577	0.0241		0.6766	0.6766		0.6328	0.6328	0.0000	2,324.3959	2,324.3959	0.5893		2,339.1278
Total	**1.4725**	**14.3184**	**13.4577**	**0.0241**	**0.0697**	**0.6766**	**0.7464**	**0.0106**	**0.6328**	**0.6433**	**0.0000**	**2,324.3959**	**2,324.3959**	**0.5893**		**2,339.1278**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	6.7000e-004	0.0461	0.0107	2.0000e-004	5.8300e-003	3.7000e-004	6.2000e-003	1.6000e-003	3.5000e-004	1.9500e-003		21.9404	21.9404	7.2000e-004	3.4800e-003	22.9945
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0361	0.0249	0.2976	8.6000e-004	0.1068	5.3000e-004	0.1073	0.0283	4.9000e-004	0.0288		88.0338	88.0338	2.7200e-003	2.5900e-003	88.8728
Total	**0.0367**	**0.0710**	**0.3084**	**1.0600e-003**	**0.1126**	**9.0000e-004**	**0.1135**	**0.0299**	**8.4000e-004**	**0.0308**		**109.9742**	**109.9742**	**3.4400e-003**	**6.0700e-003**	**111.8672**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.3 Site Preparation - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					6.2637	0.0000	6.2637	3.0038	0.0000	3.0038			0.0000			0.0000
Off-Road	1.1339	12.4250	6.6420	0.0172		0.5074	0.5074		0.4668	0.4668		1,666.0573	1,666.0573	0.5388		1,679.5282
Total	**1.1339**	**12.4250**	**6.6420**	**0.0172**	**6.2637**	**0.5074**	**6.7711**	**3.0038**	**0.4668**	**3.4706**		**1,666.0573**	**1,666.0573**	**0.5388**		**1,679.5282**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0222	0.0153	0.1832	5.3000e-004	0.0657	3.3000e-004	0.0660	0.0174	3.0000e-004	0.0177		54.1746	54.1746	1.6700e-003	1.5900e-003	54.6909
Total	**0.0222**	**0.0153**	**0.1832**	**5.3000e-004**	**0.0657**	**3.3000e-004**	**0.0660**	**0.0174**	**3.0000e-004**	**0.0177**		**54.1746**	**54.1746**	**1.6700e-003**	**1.5900e-003**	**54.6909**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.3 Site Preparation - 2023

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					6.2637	0.0000	6.2637	3.0038	0.0000	3.0038			0.0000			0.0000
Off-Road	1.1339	12.4250	6.6420	0.0172		0.5074	0.5074		0.4668	0.4668	0.0000	1,666.0573	1,666.0573	0.5388		1,679.5282
Total	**1.1339**	**12.4250**	**6.6420**	**0.0172**	**6.2637**	**0.5074**	**6.7711**	**3.0038**	**0.4668**	**3.4706**	**0.0000**	**1,666.0573**	**1,666.0573**	**0.5388**		**1,679.5282**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0222	0.0153	0.1832	5.3000e-004	0.0657	3.3000e-004	0.0660	0.0174	3.0000e-004	0.0177		54.1746	54.1746	1.6700e-003	1.5900e-003	54.6909
Total	**0.0222**	**0.0153**	**0.1832**	**5.3000e-004**	**0.0657**	**3.3000e-004**	**0.0660**	**0.0174**	**3.0000e-004**	**0.0177**		**54.1746**	**54.1746**	**1.6700e-003**	**1.5900e-003**	**54.6909**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.4 Grading - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					7.0826	0.0000	7.0826	3.4247	0.0000	3.4247			0.0000			0.0000
Off-Road	1.3330	14.4676	8.7038	0.0206		0.6044	0.6044		0.5560	0.5560		1,995.6147	1,995.6147	0.6454		2,011.7503
Total	**1.3330**	**14.4676**	**8.7038**	**0.0206**	**7.0826**	**0.6044**	**7.6869**	**3.4247**	**0.5560**	**3.9807**		**1,995.6147**	**1,995.6147**	**0.6454**		**2,011.7503**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0277	0.0192	0.2290	6.6000e-004	0.0822	4.1000e-004	0.0826	0.0218	3.8000e-004	0.0222		67.7183	67.7183	2.0900e-003	1.9900e-003	68.3637
Total	**0.0277**	**0.0192**	**0.2290**	**6.6000e-004**	**0.0822**	**4.1000e-004**	**0.0826**	**0.0218**	**3.8000e-004**	**0.0222**		**67.7183**	**67.7183**	**2.0900e-003**	**1.9900e-003**	**68.3637**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.4 Grading - 2023

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					7.0826	0.0000	7.0826	3.4247	0.0000	3.4247			0.0000			0.0000
Off-Road	1.3330	14.4676	8.7038	0.0206		0.6044	0.6044		0.5560	0.5560	0.0000	1,995.6147	1,995.6147	0.6454		2,011.7503
Total	**1.3330**	**14.4676**	**8.7038**	**0.0206**	**7.0826**	**0.6044**	**7.6869**	**3.4247**	**0.5560**	**3.9807**	**0.0000**	**1,995.6147**	**1,995.6147**	**0.6454**		**2,011.7503**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0277	0.0192	0.2290	6.6000e-004	0.0822	4.1000e-004	0.0826	0.0218	3.8000e-004	0.0222		67.7183	67.7183	2.0900e-003	1.9900e-003	68.3637
Total	**0.0277**	**0.0192**	**0.2290**	**6.6000e-004**	**0.0822**	**4.1000e-004**	**0.0826**	**0.0218**	**3.8000e-004**	**0.0222**		**67.7183**	**67.7183**	**2.0900e-003**	**1.9900e-003**	**68.3637**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.5 Building Construction - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.5233	11.7104	12.6111	0.0221		0.5145	0.5145		0.4968	0.4968		2,001.7877	2,001.7877	0.3399		2,010.2858
Total	**1.5233**	**11.7104**	**12.6111**	**0.0221**		**0.5145**	**0.5145**		**0.4968**	**0.4968**		**2,001.7877**	**2,001.7877**	**0.3399**		**2,010.2858**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	9.4600e-003	0.4085	0.1275	1.8300e-003	0.0610	2.3500e-003	0.0633	0.0176	2.2400e-003	0.0198		195.9949	195.9949	3.9800e-003	0.0290	204.7383
Worker	0.1581	0.1093	1.3050	3.7700e-003	0.4682	2.3200e-003	0.4706	0.1242	2.1400e-003	0.1263		385.9943	385.9943	0.0119	0.0114	389.6729
Total	**0.1676**	**0.5178**	**1.4325**	**5.6000e-003**	**0.5292**	**4.6700e-003**	**0.5339**	**0.1418**	**4.3800e-003**	**0.1461**		**581.9892**	**581.9892**	**0.0159**	**0.0404**	**594.4112**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.5 Building Construction - 2023

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.5233	11.7104	12.6111	0.0221		0.5145	0.5145		0.4968	0.4968	0.0000	2,001.7877	2,001.7877	0.3399		2,010.2858
Total	**1.5233**	**11.7104**	**12.6111**	**0.0221**		**0.5145**	**0.5145**		**0.4968**	**0.4968**	**0.0000**	**2,001.7877**	**2,001.7877**	**0.3399**		**2,010.2858**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	9.4600e-003	0.4085	0.1275	1.8300e-003	0.0610	2.3500e-003	0.0633	0.0176	2.2400e-003	0.0198		195.9949	195.9949	3.9800e-003	0.0290	204.7383
Worker	0.1581	0.1093	1.3050	3.7700e-003	0.4682	2.3200e-003	0.4706	0.1242	2.1400e-003	0.1263		385.9943	385.9943	0.0119	0.0114	389.6729
Total	**0.1676**	**0.5178**	**1.4325**	**5.6000e-003**	**0.5292**	**4.6700e-003**	**0.5339**	**0.1418**	**4.3800e-003**	**0.1461**		**581.9892**	**581.9892**	**0.0159**	**0.0404**	**594.4112**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.5 Building Construction - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.4200	11.0639	12.5172	0.0221		0.4506	0.4506		0.4348	0.4348		2,001.9214	2,001.9214	0.3334		2,010.2563
Total	**1.4200**	**11.0639**	**12.5172**	**0.0221**		**0.4506**	**0.4506**		**0.4348**	**0.4348**		**2,001.9214**	**2,001.9214**	**0.3334**		**2,010.2563**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	9.1700e-003	0.4087	0.1248	1.8000e-003	0.0610	2.3700e-003	0.0633	0.0176	2.2600e-003	0.0198		192.9445	192.9445	3.9600e-003	0.0286	201.5511
Worker	0.1483	0.0976	1.2206	3.6500e-003	0.4682	2.2100e-003	0.4705	0.1242	2.0400e-003	0.1262		376.4778	376.4778	0.0108	0.0106	379.8979
Total	**0.1575**	**0.5062**	**1.3455**	**5.4500e-003**	**0.5292**	**4.5800e-003**	**0.5338**	**0.1418**	**4.3000e-003**	**0.1461**		**569.4223**	**569.4223**	**0.0148**	**0.0391**	**581.4490**

Drake Avenue Apartments - Bay Area AQMD Air District, Winter

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.5 Building Construction - 2024

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.4200	11.0639	12.5172	0.0221		0.4506	0.4506		0.4348	0.4348	0.0000	2,001.9214	2,001.9214	0.3334		2,010.2563
Total	**1.4200**	**11.0639**	**12.5172**	**0.0221**		**0.4506**	**0.4506**		**0.4348**	**0.4348**	**0.0000**	**2,001.9214**	**2,001.9214**	**0.3334**		**2,010.2563**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	9.1700e-003	0.4087	0.1248	1.8000e-003	0.0610	2.3700e-003	0.0633	0.0176	2.2600e-003	0.0198		192.9445	192.9445	3.9600e-003	0.0286	201.5511
Worker	0.1483	0.0976	1.2206	3.6500e-003	0.4682	2.2100e-003	0.4705	0.1242	2.0400e-003	0.1262		376.4778	376.4778	0.0108	0.0106	379.8979
Total	**0.1575**	**0.5062**	**1.3455**	**5.4500e-003**	**0.5292**	**4.5800e-003**	**0.5338**	**0.1418**	**4.3000e-003**	**0.1461**		**569.4223**	**569.4223**	**0.0148**	**0.0391**	**581.4490**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.5 Building Construction - 2025

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.3246	10.4128	12.4393	0.0221		0.3925	0.3925		0.3785	0.3785		2,002.1524	2,002.1524	0.3269		2,010.3248
Total	**1.3246**	**10.4128**	**12.4393**	**0.0221**		**0.3925**	**0.3925**		**0.3785**	**0.3785**		**2,002.1524**	**2,002.1524**	**0.3269**		**2,010.3248**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	8.9300e-003	0.4071	0.1227	1.7700e-003	0.0610	2.3600e-003	0.0633	0.0176	2.2600e-003	0.0198		189.5162	189.5162	3.9400e-003	0.0280	197.9671
Worker	0.1398	0.0879	1.1471	3.5300e-003	0.4682	2.1200e-003	0.4704	0.1242	1.9500e-003	0.1262		367.4859	367.4859	9.8300e-003	9.9100e-003	370.6838
Total	**0.1487**	**0.4950**	**1.2698**	**5.3000e-003**	**0.5292**	**4.4800e-003**	**0.5337**	**0.1418**	**4.2100e-003**	**0.1460**		**557.0021**	**557.0021**	**0.0138**	**0.0379**	**568.6509**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.5 Building Construction - 2025

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.3246	10.4128	12.4393	0.0221		0.3925	0.3925		0.3785	0.3785	0.0000	2,002.1524	2,002.1524	0.3269		2,010.3248
Total	**1.3246**	**10.4128**	**12.4393**	**0.0221**		**0.3925**	**0.3925**		**0.3785**	**0.3785**	**0.0000**	**2,002.1524**	**2,002.1524**	**0.3269**		**2,010.3248**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	8.9300e-003	0.4071	0.1227	1.7700e-003	0.0610	2.3600e-003	0.0633	0.0176	2.2600e-003	0.0198		189.5162	189.5162	3.9400e-003	0.0280	197.9671
Worker	0.1398	0.0879	1.1471	3.5300e-003	0.4682	2.1200e-003	0.4704	0.1242	1.9500e-003	0.1262		367.4859	367.4859	9.8300e-003	9.9100e-003	370.6838
Total	**0.1487**	**0.4950**	**1.2698**	**5.3000e-003**	**0.5292**	**4.4800e-003**	**0.5337**	**0.1418**	**4.2100e-003**	**0.1460**		**557.0021**	**557.0021**	**0.0138**	**0.0379**	**568.6509**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.6 Paving - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.6446	6.2357	8.8024	0.0136		0.3084	0.3084		0.2846	0.2846		1,297.6880	1,297.6880	0.4114		1,307.9725
Paving	0.0192					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	**0.6638**	**6.2357**	**8.8024**	**0.0136**		**0.3084**	**0.3084**		**0.2846**	**0.2846**		**1,297.6880**	**1,297.6880**	**0.4114**		**1,307.9725**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0361	0.0249	0.2976	8.6000e-004	0.1068	5.3000e-004	0.1073	0.0283	4.9000e-004	0.0288		88.0338	88.0338	2.7200e-003	2.5900e-003	88.8728
Total	**0.0361**	**0.0249**	**0.2976**	**8.6000e-004**	**0.1068**	**5.3000e-004**	**0.1073**	**0.0283**	**4.9000e-004**	**0.0288**		**88.0338**	**88.0338**	**2.7200e-003**	**2.5900e-003**	**88.8728**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.6 Paving - 2023

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.6446	6.2357	8.8024	0.0136		0.3084	0.3084		0.2846	0.2846	0.0000	1,297.6880	1,297.6880	0.4114		1,307.9725
Paving	0.0192					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	**0.6638**	**6.2357**	**8.8024**	**0.0136**		**0.3084**	**0.3084**		**0.2846**	**0.2846**	**0.0000**	**1,297.6880**	**1,297.6880**	**0.4114**		**1,307.9725**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0361	0.0249	0.2976	8.6000e-004	0.1068	5.3000e-004	0.1073	0.0283	4.9000e-004	0.0288		88.0338	88.0338	2.7200e-003	2.5900e-003	88.8728
Total	**0.0361**	**0.0249**	**0.2976**	**8.6000e-004**	**0.1068**	**5.3000e-004**	**0.1073**	**0.0283**	**4.9000e-004**	**0.0288**		**88.0338**	**88.0338**	**2.7200e-003**	**2.5900e-003**	**88.8728**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.7 Architectural Coating - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	2.8266					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.1917	1.3030	1.8111	2.9700e-003		0.0708	0.0708		0.0708	0.0708		281.4481	281.4481	0.0168		281.8690
Total	**3.0183**	**1.3030**	**1.8111**	**2.9700e-003**		**0.0708**	**0.0708**		**0.0708**	**0.0708**		**281.4481**	**281.4481**	**0.0168**		**281.8690**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0305	0.0211	0.2519	7.3000e-004	0.0904	4.5000e-004	0.0908	0.0240	4.1000e-004	0.0244		74.4901	74.4901	2.3000e-003	2.1900e-003	75.2000
Total	**0.0305**	**0.0211**	**0.2519**	**7.3000e-004**	**0.0904**	**4.5000e-004**	**0.0908**	**0.0240**	**4.1000e-004**	**0.0244**		**74.4901**	**74.4901**	**2.3000e-003**	**2.1900e-003**	**75.2000**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.7 Architectural Coating - 2023

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	2.8266					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.1917	1.3030	1.8111	2.9700e-003		0.0708	0.0708		0.0708	0.0708	0.0000	281.4481	281.4481	0.0168		281.8690
Total	**3.0183**	**1.3030**	**1.8111**	**2.9700e-003**		**0.0708**	**0.0708**		**0.0708**	**0.0708**	**0.0000**	**281.4481**	**281.4481**	**0.0168**		**281.8690**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0305	0.0211	0.2519	7.3000e-004	0.0904	4.5000e-004	0.0908	0.0240	4.1000e-004	0.0244		74.4901	74.4901	2.3000e-003	2.1900e-003	75.2000
Total	**0.0305**	**0.0211**	**0.2519**	**7.3000e-004**	**0.0904**	**4.5000e-004**	**0.0908**	**0.0240**	**4.1000e-004**	**0.0244**		**74.4901**	**74.4901**	**2.3000e-003**	**2.1900e-003**	**75.2000**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.7 Architectural Coating - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	2.8266					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.1808	1.2188	1.8101	2.9700e-003		0.0609	0.0609		0.0609	0.0609		281.4481	281.4481	0.0159		281.8443
Total	**3.0074**	**1.2188**	**1.8101**	**2.9700e-003**		**0.0609**	**0.0609**		**0.0609**	**0.0609**		**281.4481**	**281.4481**	**0.0159**		**281.8443**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0286	0.0188	0.2356	7.0000e-004	0.0904	4.3000e-004	0.0908	0.0240	3.9000e-004	0.0244		72.6536	72.6536	2.0900e-003	2.0400e-003	73.3136
Total	**0.0286**	**0.0188**	**0.2356**	**7.0000e-004**	**0.0904**	**4.3000e-004**	**0.0908**	**0.0240**	**3.9000e-004**	**0.0244**		**72.6536**	**72.6536**	**2.0900e-003**	**2.0400e-003**	**73.3136**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.7 Architectural Coating - 2024

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	2.8266					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.1808	1.2188	1.8101	2.9700e-003		0.0609	0.0609		0.0609	0.0609	0.0000	281.4481	281.4481	0.0159		281.8443
Total	**3.0074**	**1.2188**	**1.8101**	**2.9700e-003**		**0.0609**	**0.0609**		**0.0609**	**0.0609**	**0.0000**	**281.4481**	**281.4481**	**0.0159**		**281.8443**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0286	0.0188	0.2356	7.0000e-004	0.0904	4.3000e-004	0.0908	0.0240	3.9000e-004	0.0244		72.6536	72.6536	2.0900e-003	2.0400e-003	73.3136
Total	**0.0286**	**0.0188**	**0.2356**	**7.0000e-004**	**0.0904**	**4.3000e-004**	**0.0908**	**0.0240**	**3.9000e-004**	**0.0244**		**72.6536**	**72.6536**	**2.0900e-003**	**2.0400e-003**	**73.3136**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.7 Architectural Coating - 2025

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	2.8266					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.1709	1.1455	1.8091	2.9700e-003		0.0515	0.0515		0.0515	0.0515		281.4481	281.4481	0.0154		281.8319
Total	**2.9975**	**1.1455**	**1.8091**	**2.9700e-003**		**0.0515**	**0.0515**		**0.0515**	**0.0515**		**281.4481**	**281.4481**	**0.0154**		**281.8319**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0270	0.0170	0.2214	6.8000e-004	0.0904	4.1000e-004	0.0908	0.0240	3.8000e-004	0.0243		70.9183	70.9183	1.9000e-003	1.9100e-003	71.5355
Total	**0.0270**	**0.0170**	**0.2214**	**6.8000e-004**	**0.0904**	**4.1000e-004**	**0.0908**	**0.0240**	**3.8000e-004**	**0.0243**		**70.9183**	**70.9183**	**1.9000e-003**	**1.9100e-003**	**71.5355**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.7 Architectural Coating - 2025

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	2.8266					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.1709	1.1455	1.8091	2.9700e-003		0.0515	0.0515		0.0515	0.0515	0.0000	281.4481	281.4481	0.0154		281.8319
Total	**2.9975**	**1.1455**	**1.8091**	**2.9700e-003**		**0.0515**	**0.0515**		**0.0515**	**0.0515**	**0.0000**	**281.4481**	**281.4481**	**0.0154**		**281.8319**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0270	0.0170	0.2214	6.8000e-004	0.0904	4.1000e-004	0.0908	0.0240	3.8000e-004	0.0243		70.9183	70.9183	1.9000e-003	1.9100e-003	71.5355
Total	**0.0270**	**0.0170**	**0.2214**	**6.8000e-004**	**0.0904**	**4.1000e-004**	**0.0908**	**0.0240**	**3.8000e-004**	**0.0243**		**70.9183**	**70.9183**	**1.9000e-003**	**1.9100e-003**	**71.5355**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

Increase Transit Accessibility

Improve Pedestrian Network

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	0.8349	0.9452	8.0238	0.0150	1.7261	0.0113	1.7374	0.4597	0.0105	0.4703		1,564.1754	1,564.1754	0.1140	0.0806	1,591.0487
Unmitigated	0.8833	1.0360	8.7571	0.0169	1.9570	0.0126	1.9696	0.5212	0.0118	0.5330		1,765.7113	1,765.7113	0.1222	0.0882	1,795.0515

4.2 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Apartments Mid Rise	402.56	363.34	302.66	883,854	779,559
Parking Lot	0.00	0.00	0.00		
Total	402.56	363.34	302.66	883,854	779,559

4.3 Trip Type Information

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Apartments Mid Rise	10.80	4.80	5.70	31.00	15.00	54.00	86	11	3
Parking Lot	9.50	7.30	7.30	0.00	0.00	0.00	0	0	0

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Apartments Mid Rise	0.553839	0.058700	0.188468	0.120786	0.022796	0.005663	0.010629	0.007566	0.000983	0.000556	0.026354	0.000841	0.002820
Parking Lot	0.553839	0.058700	0.188468	0.120786	0.022796	0.005663	0.010629	0.007566	0.000983	0.000556	0.026354	0.000841	0.002820

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
NaturalGas Mitigated	0.0185	0.1578	0.0671	1.0100e-003		0.0128	0.0128		0.0128	0.0128		201.3804	201.3804	3.8600e-003	3.6900e-003	202.5771
NaturalGas Unmitigated	0.0185	0.1578	0.0671	1.0100e-003		0.0128	0.0128		0.0128	0.0128		201.3804	201.3804	3.8600e-003	3.6900e-003	202.5771

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
Apartments Mid Rise	1711.73	0.0185	0.1578	0.0671	1.0100e-003		0.0128	0.0128		0.0128	0.0128		201.3804	201.3804	3.8600e-003	3.6900e-003	202.5771
Parking Lot	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Total		**0.0185**	**0.1578**	**0.0671**	**1.0100e-003**		**0.0128**	**0.0128**		**0.0128**	**0.0128**		**201.3804**	**201.3804**	**3.8600e-003**	**3.6900e-003**	**202.5771**

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
Apartments Mid Rise	1.71173	0.0185	0.1578	0.0671	1.0100e-003		0.0128	0.0128		0.0128	0.0128		201.3804	201.3804	3.8600e-003	3.6900e-003	202.5771
Parking Lot	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Total		**0.0185**	**0.1578**	**0.0671**	**1.0100e-003**		**0.0128**	**0.0128**		**0.0128**	**0.0128**		**201.3804**	**201.3804**	**3.8600e-003**	**3.6900e-003**	**202.5771**

6.0 Area Detail

Drake Avenue Apartments - Bay Area AQMD Air District, Winter

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

6.1 Mitigation Measures Area

No Hearths Installed

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	2.0569	0.0703	6.1018	3.2000e-004		0.0339	0.0339		0.0339	0.0339	0.0000	10.9981	10.9981	0.0105	0.0000	11.2616
Unmitigated	32.4901	0.7431	46.3101	0.0778		5.7420	5.7420		5.7420	5.7420	619.4426	285.2334	904.6760	0.8582	0.0438	939.1790

Drake Avenue Apartments - Bay Area AQMD Air District, Winter

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	0.2865					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	1.5870					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Hearth	30.4333	0.6728	40.2083	0.0775		5.7082	5.7082		5.7082	5.7082	619.4426	274.2353	893.6779	0.8477	0.0438	927.9174
Landscaping	0.1834	0.0703	6.1018	3.2000e-004		0.0339	0.0339		0.0339	0.0339		10.9981	10.9981	0.0105		11.2616
Total	**32.4901**	**0.7431**	**46.3101**	**0.0778**		**5.7420**	**5.7420**		**5.7420**	**5.7420**	**619.4426**	**285.2334**	**904.6760**	**0.8582**	**0.0438**	**939.1790**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

6.2 Area by SubCategory

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	0.2865					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	1.5870					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Hearth	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	0.1834	0.0703	6.1018	3.2000e-004		0.0339	0.0339		0.0339	0.0339		10.9981	10.9981	0.0105		11.2616
Total	**2.0569**	**0.0703**	**6.1018**	**3.2000e-004**		**0.0339**	**0.0339**		**0.0339**	**0.0339**	**0.0000**	**10.9981**	**10.9981**	**0.0105**	**0.0000**	**11.2616**

7.0 Water Detail

7.1 Mitigation Measures Water

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

8.0 Waste Detail

8.1 Mitigation Measures Waste

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type

10.0 Stationary Equipment

Fire Pumps and Emergency Generators

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type

Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type

User Defined Equipment

Equipment Type	Number

11.0 Vegetation

AERMOD Model Options

Model Options

Pathway	Keyword	Description	Value
CO	TITLEONE	Project title 1	Drake Avenue Apartments Project
CO	TITLETWO	Project title 2	
CO	MODELOPT	Model options	DFAULT,CONC,NODRYDPLT,NOWETDPLT
CO	AVERTIME	Averaging times	1,ANNUAL
CO	URBANOPT	Urban options	
CO	POLLUTID	Pollutant ID	PM25 H1H
CO	HALFLIFE	Half life	
CO	DCAYCOEF	Decay coefficient	
CO	FLAGPOLE	Flagpole receptor heights	1.8
CO	RUNORNOT	Run or Not	RUN
CO	EVENTFIL	Event file	F
CO	SAVEFILE	Save file	F
CO	INITFILE	Initialization file	
CO	MULTYEAR	Multiple year option	N/A
CO	DEBUGOPT	Debug options	N/A
CO	ERRORFIL	Error file	F
SO	ELEVUNIT	Elevation units	METERS
SO	EMISUNIT	Emission units	N/A
RE	ELEVUNIT	Elevation units	METERS
ME	SURFFILE	Surface met file	C:\USERS\BSHEA\DESKTOP\METEOR~1\SANFRA~1.SFC
ME	PROFFILE	Profile met file	C:\USERS\BSHEA\DESKTOP\METEOR~1\SANFRA~1.PFL
ME	SURFDATA	Surf met data info.	23234 2009
ME	UAIRDATA	U-Air met data info.	23230 2009
ME	SITEDATA	On-site met data info.	
ME	PROFBASE	Elev. above MSL	4
ME	STARTEND	Start-end met dates	
ME	WDROTATE	Wind dir. rot. adjust.	
ME	WINDCATS	Wind speed cat. max.	
ME	SCIMBYHR	SCIM sample params	
EV	DAYTABLE	Print summary opt.	N/A
OU	EVENTOUT	Output info. level	N/A

OU	DAYTABLE	Print summary opt.	

Source Parameter Tables

All Sources

Source ID / Pollutant ID	Source Type	Description	UTM		Elev.	Emiss. Rate	Emiss. Units	Release Height
			East (m)	North (m)	(m)			(m)
RDJB81A1	VOLUME		542755.0	4192009.9	0	0.004730686	(g/s)	5

Volume Sources

Source ID / Pollutant ID	Description	UTM		Elev.	Emiss. Rate	Release Height	Init. Lat. Dim.	Init. Vert. Dim.
		East (m)	North (m)	(m)	(g/s)	(m)	(m)	(m)
RDJB81A1		542755.0	4192009.9	0	0.004730686	5	29.59	1

BREEZE AERMOD Model Results

Max. Annual (5 YEARS) Results of Pollutant: PM25 (ug/m**3)

Group ID	High	Avg. Conc.	UTM		Elev.	Hill Ht.	Flag Ht.	Rec. Type	Grid ID
			East (m)	North (m)	(m)	(m)	(m)		
ALL	1ST	0.10570	542747.30	4191943.10	0.00	0.00	1.80	DC	
	2ND	0.09254	542752.30	4191938.10	0.00	0.00	1.80	DC	
	3RD	0.09191	542815.20	4192036.40	0.00	0.00	1.80	DC	
	4TH	0.09137	542747.30	4191938.10	0.00	0.00	1.80	DC	
	5TH	0.08934	542742.30	4191938.10	0.00	0.00	1.80	DC	
	6TH	0.08728	542810.20	4192046.40	0.00	0.00	1.80	DC	
	7TH	0.08659	542820.20	4192031.40	0.00	0.00	1.80	DC	
	8TH	0.08106	542820.20	4192036.40	0.00	0.00	1.80	DC	
	9TH	0.08008	542752.30	4191933.10	0.00	0.00	1.80	DC	
	10TH	0.07939	542747.30	4191933.10	0.00	0.00	1.80	DC	

Highest Results of Pollutant: PM25

Avg. Per.	Grp ID	High	Type	Val	Units	Date	UTM		Elev.	Hill Ht.	Flag Ht.	Rec. Type	Grid ID
						YYMMDDHH	East (m)	North (m)	(m)	(m)	(m)		
1-HR	ALL	1ST	Avg. Conc.	6.81816	ug/m**3	13122308	542747.30	4191943.10	0.00	0.00	1.80	DC	

Summary of Total Messages

#	Message Type
0	Fatal Error Message(s)
4	Warning Message(s)
6306	Informational Message(s)
43872	Hours Were Processed
5804	Calm Hours Identified
502	Missing Hours Identified (1.14 Percent)

Error & Warning Messages

Msg. Type	Pathway	Ref. #	Description
WARNING	CO	W276	Special proc for 1h-NO2/SO2 24hPM25 NAAQS disabled PM25 H1H
WARNING	CO	W363	Multiyr 24h/Ann PM25 processing not applicable for PM25 H1H

WARNING	OU	W565	Possible Conflict With Dynamically Allocated FUNIT PLOTFILE
WARNING	MX	W481	Data Remaining After End of Year. Number of Hours= 48

www.breeze-software.com

*HARP - HRACalc v21081 3/10/2023 11:11:05 AM - Cancer Risk - Input File: C:\Users\bshea\Desktop\H

INDEX	GRP1	GRP2	POLID	POLABBRE'	CONC	RISK_SUM	SCENARIO	DETAILS
1			9901	DieselExhP	0.1057	3.62E-05	2YrCancerI	*

HARP\Drake_HRAInput.hra

INH_RISK	SOIL_RISK	DERMAL_R	MMILK_RIS	WATER_RIS	FISH_RISK	CROP_RISK	BEEF_RISK	DAIRY_RISK
3.62E-05	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00

36.16

PIG_RISK	CHICKEN_R	EGG_RISK	1ST_DRIVE	2ND_DRIVI	PASTURE_C	FISH_CONC	WATER_CONC
0.00E+00	0.00E+00	0.00E+00	INHALATION		0.00E+00	0.00E+00	0.00E+00

*HARP - HRACalc v21081 3/10/2023 11:11:05 AM - Chronic Risk - Input File: C:\Users\bshea\Desktop\HA

INDEX	GRP1	GRP2	POLID	POLABBREV	CONC	SCENARIO	CV
1			9901	DieselExhPM	0.1057	NonCancerChronicDerived_Inh	0.00E+00

.RP\Drake_HRAInput.hra

CNS	IMMUN	KIDNEY	GILV	REPRO/DEVEL	RESP	SKIN	EYE	BONE/TEETH
0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	2.11E-02	0.00E+00	0.00E+00	0.00E+00

ENDO	BLOOD	ODOR	GENERAL	DETAILS	INH_CONC	SOIL_DOSE	DERMAL_DOSE
0.00E+00	0.00E+00	0.00E+00	0.00E+00	*	1.06E-01	0.00E+00	0.00E+00

MMILK_DOSE	WATER_DOSE	FISH_DOSE	CROP_DOSE	BEEF_DOSE	DAIRY_DOSE	PIG_DOSE
0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00

CHICKEN_DOSE	EGG_DOSE	1ST_DRIVER	2ND_DRIVER	3RD_DRIVER	PASTURE_CONC	FISH_CONC
0.00E+00	0.00E+00	INHALATION			0.00E+00	0.00E+00

WATER_CONC

0.00E+00

*HARP - HRACalc v21081 3/10/2023 11:11:05 AM - Acute Risk - Input File: C:\Users\bshea\Desktop\HARP\Drak

INDEX	GRP1	GRP2	POLID	POLABBREV	CONC	SCENARIO	CV	CNS	IMMUN
1			9901	DieselExhPM	6.81816	NonCancerAcute	0.00E+00	0.00E+00	0.00E+00

e_HRAInput.hra

KIDNEY	GILV	REPRO/DEVEL	RESP	SKIN	EYE	BONE/TEETH	ENDO	BLOOD
0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00

ODOR	GENERAL
0.00E+00	0.00E+00

AERMOD Model Options

Model Options

Pathway	Keyword	Description	Value
CO	TITLEONE	Project title 1	Drake Avenue Apartments Project
CO	TITLETWO	Project title 2	
CO	MODELOPT	Model options	DFAULT,CONC,NODRYDPLT,NOWETDPLT
CO	AVERTIME	Averaging times	1,ANNUAL
CO	URBANOPT	Urban options	
CO	POLLUTID	Pollutant ID	PM25 H1H
CO	HALFLIFE	Half life	
CO	DCAYCOEF	Decay coefficient	
CO	FLAGPOLE	Flagpole receptor heights	1.8
CO	RUNORNOT	Run or Not	RUN
CO	EVENTFIL	Event file	F
CO	SAVEFILE	Save file	F
CO	INITFILE	Initialization file	
CO	MULTYEAR	Multiple year option	N/A
CO	DEBUGOPT	Debug options	N/A
CO	ERRORFIL	Error file	F
SO	ELEVUNIT	Elevation units	METERS
SO	EMISUNIT	Emission units	N/A
RE	ELEVUNIT	Elevation units	METERS
ME	SURFFILE	Surface met file	C:\USERS\BSHEA\DESKTOP\METEOR~1\SANFRA~1.SFC
ME	PROFFILE	Profile met file	C:\USERS\BSHEA\DESKTOP\METEOR~1\SANFRA~1.PFL
ME	SURFDATA	Surf met data info.	23234 2009
ME	UAIRDATA	U-Air met data info.	23230 2009
ME	SITEDATA	On-site met data info.	
ME	PROFBASE	Elev. above MSL	4
ME	STARTEND	Start-end met dates	
ME	WDROTATE	Wind dir. rot. adjust.	
ME	WINDCATS	Wind speed cat. max.	
ME	SCIMBYHR	SCIM sample params	
EV	DAYTABLE	Print summary opt.	N/A
OU	EVENTOUT	Output info. level	N/A

OU	DAYTABLE	Print summary opt.	

Source Parameter Tables

All Sources

Source ID / Pollutant ID	Source Type	Description	UTM		Elev.	Emiss. Rate	Emiss. Units	Release Height
			East (m)	North (m)	(m)			(m)
RDJB81A1	VOLUME		542755	4192009.9	0	0.001306	(g/s)	5

Volume Sources

Source ID / Pollutant ID	Description	UTM		Elev.	Emiss. Rate	Release Height	Init. Lat. Dim.	Init. Vert. Dim.
		East (m)	North (m)	(m)	(g/s)	(m)	(m)	(m)
RDJB81A1		542755	4192009.9	0	0.001306	5	29.59	1

BREEZE AERMOD Model Results

Max. Annual (5 YEARS) Results of Pollutant: PM25 (ug/m**3)

Group ID	High	Avg. Conc.	UTM		Elev.	Hill Ht.	Flag Ht.	Rec. Type	Grid ID
			East (m)	North (m)	(m)	(m)	(m)		
ALL	1ST	0.02918	542747.30	4191943.10	0.00	0.00	1.80	DC	
	2ND	0.02555	542752.30	4191938.10	0.00	0.00	1.80	DC	
	3RD	0.02537	542815.20	4192036.40	0.00	0.00	1.80	DC	
	4TH	0.02523	542747.30	4191938.10	0.00	0.00	1.80	DC	
	5TH	0.02466	542742.30	4191938.10	0.00	0.00	1.80	DC	
	6TH	0.02409	542810.20	4192046.40	0.00	0.00	1.80	DC	
	7TH	0.02390	542820.20	4192031.40	0.00	0.00	1.80	DC	
	8TH	0.02238	542820.20	4192036.40	0.00	0.00	1.80	DC	
	9TH	0.02211	542752.30	4191933.10	0.00	0.00	1.80	DC	
	10TH	0.02192	542747.30	4191933.10	0.00	0.00	1.80	DC	

Highest Results of Pollutant: PM25

Avg. Per.	Grp ID	High	Type	Val	Units	Date	UTM		Elev.	Hill Ht.	Flag Ht.	Rec. Type	Grid ID
						YYMMDDHH	East (m)	North (m)	(m)	(m)	(m)		
1-HR	ALL	1ST	Avg. Conc.	1.88229	ug/m**3	13122308	542747.30	4191943.10	0.00	0.00	1.80	DC	

Summary of Total Messages

#	Message Type
0	Fatal Error Message(s)
4	Warning Message(s)
6306	Informational Message(s)
43872	Hours Were Processed
5804	Calm Hours Identified
502	Missing Hours Identified (1.14 Percent)

Error & Warning Messages

Msg. Type	Pathway	Ref. #	Description
WARNING	CO	W276	Special proc for 1h-NO2/SO2 24hPM25 NAAQS disabled PM25 H1H
WARNING	CO	W363	Multiyr 24h/Ann PM25 processing not applicable for PM25 H1H

WARNING	OU	W565	Possible Conflict With Dynamically Allocated FUNIT PLOTFILE
WARNING	MX	W481	Data Remaining After End of Year. Number of Hours= 48

www.breeze-software.com

*HARP - HRACalc v21081 3/10/2023 11:14:23 AM - Cancer Risk - Input File: C:\Users\bshea\Desktop\HARP\Dra

INDEX	GRP1	GRP2	POLID	POLABBREV	CONC	RISK_SUM	SCENARIO
1			9901	DieselExhPM	0.02918	9.98E-06	2YrCancerDerived_Inh_FAH16to70

ke Mit_HRAInput.hra

DETAILS	INH_RISK	SOIL_RISK	DERMAL_RISK	MMILK_RISK	WATER_RISK	FISH_RISK	CROP_RISK
*	9.98E-06	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00

BEEF_RISK	DAIRY_RISK	PIG_RISK	CHICKEN_RISK	EGG_RISK	1ST_DRIVER	2ND_DRIVER
0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	INHALATION	

PASTURE_CONC	FISH_CONC	WATER_CONC
0.00E+00	0.00E+00	0.00E+00

*HARP - HRACalc v21081 3/10/2023 11:14:23 AM - Chronic Risk - Input File: C:\Users\bshea\Desktop\HAR

INDEX	GRP1	GRP2	POLID	POLABBREV	CONC	SCENARIO	CV
1			9901	DieselExhPM	0.02918	NonCancerChronicDerived_Inh	0.00E+00

:P\Drake Mit_HRAInput.hra

CNS	IMMUN	KIDNEY	GILV	REPRO/DEVEL	RESP	SKIN	EYE	BONE/TEETH
0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	5.84E-03	0.00E+00	0.00E+00	0.00E+00

ENDO	BLOOD	ODOR	GENERAL	DETAILS	INH_CONC	SOIL_DOSE	DERMAL_DOSE
0.00E+00	0.00E+00	0.00E+00	0.00E+00	*	2.92E-02	0.00E+00	0.00E+00

MMILK_DOSE	WATER_DOSE	FISH_DOSE	CROP_DOSE	BEEF_DOSE	DAIRY_DOSE	PIG_DOSE
0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00

CHICKEN_DOSE	EGG_DOSE	1ST_DRIVER	2ND_DRIVER	3RD_DRIVER	PASTURE_CONC	FISH_CONC
0.00E+00	0.00E+00	INHALATION			0.00E+00	0.00E+00

WATER_CONC

0.00E+00

*HARP - HRACalc v21081 3/10/2023 11:14:23 AM - Acute Risk - Input File: C:\Users\bshea\Desktop\HARP\Drak

INDEX	GRP1	GRP2	POLID	POLABBREV	CONC	SCENARIO	CV	CNS	IMMUN
1			9901	DieselExhPM	1.88229	NonCancerAcute	0.00E+00	0.00E+00	0.00E+00

e Mit_HRAInput.hra

KIDNEY	GILV	REPRO/DEVEL	RESP	SKIN	EYE	BONE/TEETH	ENDO	BLOOD
0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00

ODOR	GENERAL
0.00E+00	0.00E+00

APPENDIX C

BIOLOGICAL SITE ASSESSMENT

March 23, 2020

Gene Broussard
AMG & Associates, LLC
16633 Ventura Boulevard, Suite 10104
Encino, CA 91436

RE: Biological Site Assessment for 825 Drake Avenue

Mr. Broussard,

The purpose of this letter report is to provide you the results of the Biological Site Assessment (BSA) that WRA, Inc. (WRA) conducted at 825 Drake Avenue (APN: 052-112-03) in Sausalito, unincorporated Marin County, California (Study Area; Attachment A-Figure 1). The BSA site visit was conducted on December 27, 2019. The Study Area is composed of a single 1.01-acre improved parcel located at 825 Drake Avenue, approximately 0.2 air mile west of US Highway 101. The Study Area consists of developed areas including a paved parking lot, paved walkways, a semi-permanent church structure, a storage shed, and surrounding landscaped areas. Planted native and non-native landscape trees border the majority of the Study Area. The proposed development footprint based on the most recent Project plans (Kodama Diseno Architects and Planners, February 20, 2020), is located within the central portion of the Study Area and is referred to as the Project Area. Existing access to the Study Area is via a paved driveway in the southern portion of the Study Area adjacent to Drake Avenue.

The purpose of this assessment is to gather information necessary to complete a review of biological resources under the California Environmental Quality Act (CEQA). This report describes the results of the site visit for which the Study Area was assessed concerning: (1) the potential to support special-status plant and wildlife species; (2) the potential presence of sensitive biological communities such as wetlands or riparian habitats subject to regulatory agency jurisdiction; and (3) the potential presence of other sensitive biological resources protected by local, state, and federal laws and regulations.

A BSA provides general information on the potential presence of sensitive species and habitats. This assessment is based on information available at the time of the study and on-site conditions that were observed on the date of the site visit.

PROJECT DESCRIPTION

The Project proposes to construct a new five story affordable housing development within the central portion of the Study Area. The housing development will include 74 units of multi-family housing with 25 parking spaces. The existing structures, paved parking lot, and hardscape will be demolished and removed prior to Project construction. The areas surrounding the proposed housing development and parking areas will be landscaped with native and non-native plant species as a component of the Project.

All grading and excavation will be conducted between May 1 and September 30 of any year, and if this work is to occur prior to May 1 or after September 30 a siltation control plan will be developed by a civil engineer and implemented.

As all major grading and excavation work will occur between May 1 and September 30, it is expected that initial grading will occur during the nesting bird season, defined as: February 1 through August 31. Therefore, for work initiated between February 1 and August 31, a qualified biologist will conduct a pre-construction nesting bird survey of the property within 14 days of start of work. If no active nests are present, there will be no impacts to nesting birds and construction may begin unrestricted. If any active nests are found in proximity to work areas, a qualified biologist will establish a protective buffer zone around nests within which no work will be conducted until all young have fledged the nest or the nest is otherwise determined inactive by the qualified biologist. This will result in no impact to birds. If work is conducted between September 1 and September 30, which is not within the nesting bird season, no nesting bird surveys will be conducted and are not required, and no impacts to nesting birds will result.

Site preparation in advance of the proposed Project will require tree removal of native and non-native trees within the Study Area. Tree removal will be limited to seven trees including one "heritage tree" as defined by Marin County Native Tree Protection and Preservation Ordinance (Tree Ordinance). The remaining six trees proposed for removal are ornamental trees including Monterey cypress (*Hesperocyparis macrocarpa*), Monterey pine (*Pinus radiata*), blue gum (*Eucalyptus globulus*), silver wattle (*Acacia dealbata*), and blackwood acacia (*Acacia melanoxylon*) which are not protected per the Tree Ordinance. A tree removal permit from the Marin County Planning Division will be obtained for the removal of the one heritage tree.

REGULATORY BACKGROUND

The following natural resources are protected under one or more of several Federal, State and/or local regulations, and were considered when analyzing the Project.

Waters of the U.S.: protected under the Clean Water Act (CWA), administered by the Environmental Protection Agency (EPA) and U.S. Army Corps of Engineers (Corps):

- Includes wetlands, streams, rivers, and other aquatic habitats meeting the guidance issued by the Corps

Waters of the State: protected under the Porter-Cologne Act, administered by the Regional Water Quality Control Board (RWQCB):

- Includes surface water or groundwater, including saline waters, within the boundaries of the state, and are generally delineated following the guidance issued by the Corps.

Streams, Lakes, and Riparian Habitat: protected under the California Fish and Game Code (CFGC), administered by the California Department of Fish and Wildlife (CDFW):

- Includes creeks and rivers (bodies where water flows at least periodically or intermittently through a bed or channel having banks and supports fish or other aquatic life), and vegetation adjacent to associated with such (riparian habitat).

Sensitive Natural Communities: protected under the CFGC, administered by the CDFW:

- Includes terrestrial vegetation or plant communities that are ranked by NatureServe and considered "threatened" or "endangered" by the CDFW, lists of such are included in *List of Vegetation Alliances and Associations* (CDFG 2010).

Special-status Plant and Wildlife Species including Critical Habitat: protected under one or more of the Federal Endangered Species Act (ESA), California Endangered Species Act (CESA), California Environmental Quality Act (CEQA), administered by the U.S. Fish and Wildlife Service (USFWS), and/or CDFW:

- Includes plant listed under the ESA and/or CESA, or those plants ranked by the California Native Plant Society as Rank 1, 2, and (occasionally) 3, and 4.
- Includes wildlife listed under the ESA and/or CESA, and those wildlife listed by CDFW as Species of Special Concern or Fully Protected Species, as well as bats listed as Medium or High Priority by the Western Bat Working Group (WBWG).
- In addition to regulations for special-status species, most birds in the United States, including non-status species, have baseline legal protections under both the federal Migratory Bird Treaty Act of 1918 (MBTA) and the CFGC. Under these laws/codes, the unauthorized and deliberate "take" (essentially, injury/harm or collection) of covered species is illegal; this protection includes active nests (those with eggs or young).

Marin County Stream Conservation Areas: protected by the County's Countywide Plan (CWP), and administered under the design review process by the Community Development Agency Planning Department.

- In Marin County, a Stream Conservation Area (SCA) is designated along all natural watercourses supporting riparian vegetation for a length of 100 feet or more. The SCA consists of the watercourse itself between the tops of the banks and a strip of land extending laterally outward from the top of both banks.
- For those ephemeral streams that do not meet these criteria, a minimum 20-foot development setback is required. Development activities that may occur within a SCA are closely regulated by the County and require consideration of impacts of proposed developments on species and habitats during the environmental review process.

Marin County Native Tree Protection and Preservation Ordinance: protected under Marin County Municipal code Chapter 22.75, "Native Tree Preservation and Protection", and administered by the Community Development Agency Planning Department.

- Protected trees are defined as native oaks (*Quercus* spp.), willows (*Salix* spp.), Sargent cypress (*Hesperocyparis sargentii* [*Cupressus s.*]), and madrone (*Arbutus menziesii*) with a minimum diameter at breast height (DBH; measured 4.5 feet above grade) of six inches, and most other native tree species, including Douglas fir (*Pseudotsuga menziesii*) and California bay (*Umbellularia californica*) with a minimum DBH of 10 inches.
- Heritage trees are defined as native oaks, willows, Sargent cypress, and madrone with a minimum DBH of 16 inches, and most other native tree species with a minimum DBH of 30 inches.

- It is unlawful to remove one or more protected or heritage trees on an undeveloped lot without a tree removal permit, except as provided for in Section 22.75.050 (Exemptions) and as provided for in Section 22.75.080 (Tree Removal Permits) of the Ordinance.
- The owner of property upon which protected tree is located may request to remove heritage or protected trees not otherwise exempt from the Ordinance by filling an application for a Tree Removal Permit application.
- Tree Removal Permit conditions of approval may include planting of replacement trees at a ratio of up to three new, appropriately sized and installed trees for each protected tree to be removed, or the payment of in-lieu fees in the amount of $500 per replacement tree to be deposited into the Tree Preservation Fund managed by the Marin County Parks and Opens Space Department.

BIOLOGICAL SITE ASSESSMENT, METHODS

Prior to the site visit, background literature was reviewed to determine potential presence of regulated vegetation types, aquatic communities, and special-status plant and wildlife species. Resources reviewed for regulated vegetation communities and aquatic features include aerial photography (Google Earth 2019), the Point Bonita USGS 7.5-minute quadrangle (USGS 1954), Online Soil Survey (California Soil Resources Lab [CSRL] 2019), the California Department of Fish and Wildlife's (CDFW) California Natural Diversity Database (CNDDB) (CDFW 2019a), the California Native Plant Society's (CNPS) Electronic Inventory (2019a), *A Manual of California Vegetation, Online Edition* (CNPS 2019b), Consortium of California Herbaria (CCH 2019), *Marin Flora* (Howell et al. 2007), and USFWS National Wetland Inventory (NWI) (2019) map.

Following the background literature review, WRA biologists conducted a site visit on December 27, 2019. The Study Area was examined for indicators of wetlands, streams, and areas with an Ordinary High Water Mark (OHWM) potentially under the jurisdiction of the Corps, RWQCB, and CDFW, and which may be considered SCAs under the Marin CWP.

All plant species observed within the Study Area were documented (Attachment B). All relevant data were collected using a sub-meter accurate GPS unit, which were then digitized utilizing ArcGIS 10.0. All plant species were identified to a taxonomic level sufficient to determine rare status (CNPS 2019a) and/or invasive status (Cal-IPC 2019).

ASSESSMENT, SURVEY, AND DELINEATION RESULTS

Topography and Soils

The Study Area is situated on a southeast facing slope with elevations ranging from approximately 88 feet above mean sea level (amsl) in the northwestern portion of the Study Area, to approximately 50 feet amsl in the southeastern corner of the Study Area. The Study Area contains one soil mapping unit: Saurin-Urban land –Bonnydoon complex, 15 to 30 percent slopes (CSRL 2019).

Saurin-Urban land –Bonnydoon complex, 15 to 30 percent slopes is composed of two different soil series. Saurin series soil consist of well drained soils that formed in material weathered from

sandstone and shale. Bonnydoon series soil consist of somewhat excessively drained soils that formed in material weathered from sandstone and shale. The Saurin-Urban land –Bonnydoon complex, 15 to 30 percent slope is located on moderate slopes and is not considered a hydric soil (NRCS 2019).

Biological Communities

Two non-sensitive biological communities were identified within the Study Area, including landscaped/ornamental and developed. Biological communities present within the Study Area are described below.

Non-sensitive Biological Communities

Developed

Developed land cover occupies 0.29-acre in the Study Area. The developed area consists of a permanent church structure, storage shed, and adjacent paved parking lot area in the western portion of the Study Area. A paved walkway is also included in the developed area that connects the parking lot with the existing church structure and storage shed. All developed areas have an impervious surface.

Landscaped/Ornamental

Landscaped/ornamental land cover occupies 0.71-acre in the Study Area. The landscaped areas consist of two regularly mowed lawn areas dominated by Bermuda grass (*Cynodon dactylon*) that occur on the east and west sides of the driveway and parking area. Ornamental trees including Monterey cypress, Monterey pine, blue gum eucalyptus, silver wattle, and blackwood acacia occur throughout the landscaped areas and occur in high densities within the north western and south eastern corners of the Study Area. A mature coast redwood (*Sequoia sempervirens*) in the southern portion of the Study Area is included in the landscaped/ ornamental land cover. Raised wooden planter boxes and maintained crimson bottle brush (*Callistemon citrinus*) shrubs adjacent to the church structure and storage shed are also included within this land cover. Slightly sloped land dominated by highly invasive Andean pampas grass (*Cortaderia jubata*) surround the flat terraced lawn area in the eastern portion of the Study Area (Cal-IPC 2019).

Sensitive Biological Communities

No wetlands, streams, or other sensitive biological communities are present within the Study Area.

Special-status Plant Species

Based upon a search of the databases listed above, 68 special-status plant species have documented occurrences within the vicinity of the Study Area, defined to include the Point Bonita and three surrounding 7.5' USGS quadrangles (Attachment C). All 68 special-status plant species are unlikely or have no potential to occur within the Study Area for one or more of the following reasons:

- The Study Area is composed of developed and disturbed landscaped areas that do not contain habitat for special-status plant species.
- The Study Area does not contain hydrologic conditions (e.g., seasonal wetlands, freshwater, brackish, or salt marsh) necessary to support the special-status plant(s);
- The Study Area does not contain edaphic (soil) conditions (e.g., serpentine or volcanics) necessary to support the special-status plant(s);
- The Study Area does not contain vegetation communities (e.g., chaparral, coastal scrub, vernal pools) associated with the special-status plant(s).

Special-status Wildlife Species

A list of special-status wildlife species known to occur in the vicinity of the Study Area was compiled based on available information from CNDDB (CDFW 2019a) and USFWS IPAC (2019) (Attachment C). A total of 38 special-status wildlife species have been documented within the greater vicinity of the Study Area. Of these 38 special-status wildlife species, only three (3) were determined to have a moderate potential to occur in the Study Area, and are discussed below. The remaining 35 special-status wildlife species are unlikely or have no potential to occur within the Study Area due to one or more of the following reasons:

- Aquatic habitats (e.g., rivers/streams, ponds, estuarine waters) necessary to support the special-status wildlife species are not present in the Study Area;
- Vegetation types (e.g., tidal or freshwater marsh, chaparral) that provide nesting and/or foraging resources necessary support the special-status wildlife species are not present or within the immediate vicinity of the Study Area;
- Structures or vegetative substrates (e.g., emergent wetland/marsh vegetation, substantial tree cavities/snags) necessary to provide nesting or cover habitat to support the special-status wildlife species are not present or within the immediate vicinity of the Study Area;
- Host plants (e.g. dog violet, harlequin lotus) necessary to provide larval and nectar resources for the special-status wildlife species are not present in the Study Area;
- The Study Area is outside (e.g., north of, west of) of the special-status wildlife species known local range (including nesting/breeding range, for birds).

All special-status wildlife species which were assessed as having the potential to occur within the Study Area, are detailed in Table 1 below.

Table 1. Potential for Special-Status Wildlife Species to Occur in the Study Area

SPECIES / STATUS	HABITAT REQUIREMENTS	POTENTIAL TO OCCUR IN THE STUDY AREA
pallid bat (*Antrozous pallidus*) CDFW Species of Special Concern, Western Bat Working Group High Priority	Found in a variety of habitats ranging from grasslands to mixed forests, favoring open and dry, rocky areas. Roost sites include crevices in rock outcrops and cliffs, caves, mines, and also hollow trees and various manmade structures such as bridges, barns, and buildings (including occupied buildings)	**Moderate Potential (Not Observed).** Buildings directly adjacent to the Study Area could provide hibernacula or maternity roosts for this species.
hoary bat (*Lasiurus cinereus*) Western Bat Working Group Medium Priority	Prefers open forested habitats or habitat mosaics, with access to trees for cover and open areas or habitat edges for feeding. Roosts in dense foliage of medium to large trees.	**Moderate Potential (Not Observed).** Large trees adjacent to the Study Area, broadleaf and otherwise, could provide roosting habitat for this species.
white-tailed kite *Elanus leucurus*	Year-round resident in coastal and valley lowlands with scattered trees and large shrubs, including grasslands, marshes and agricultural areas. Nests in trees, of which the type and setting are highly variable. Preys on small mammals and other vertebrates.	**Moderate Potential (Not Observed).** Large trees within the Study Area could provide nesting substrates for this species. Foraging on the Study Area, however, is unlikely due to its landscaped nature.

Non-status wildlife (birds) with baseline legal protections have the potential to nest within the Study Area.

Nesting birds (non-status), High Potential (Assumed Present). The Study Area contains vegetation (small ornamental trees, shrubbery, large trees, etc.) that may be used as nesting habitat by bird species with baseline legal protections. These laws/codes apply to a wide variety of native birds, including species that are non-migratory and/or commonly found in rural Marin County.

SUMMARY & HABITAT/SPECIES-SPECIFIC SUMMARY

Sensitive Biological Communities

The Study Area contains no wetlands, streams, or other sensitive vegetation communities that would require the designation of a SCA. No wetlands, streams, or other sensitive vegetation communities occur within 100 feet of the Study Area.

Heritage and Protected Trees

An arborist survey report has been prepared for the Project (WRA, 2020), which identified one heritage tree within the Study Area. Removal of the single heritage tree and six non-protected trees will occur as a component of the proposed project. A tree removal permit will be obtained from the County for the removal of the single heritage tree. Tree replacement may be required as a condition of approval for the Project. The Project shall follow all tree removal permit conditions of approval as required by the County. Conditions of approval may include replacement tree plantings at a ratio of three new, appropriately sized and installed trees for each designated tree to be removed, or the payment of in-lieu fees in the amount of $500 per replacement tree to be deposited in the County's Tree Preservation Fund. Adherence to the Marin County Tree Ordinance Tree Removal Permit process will ensure that impacts to protected and heritage trees are less-than-significant.

Special-status Plant Species

No special-status plant species were determined to have a moderate or high potential to occur within the Study Area. No special-status plants were observed in the Study Area during the site visits. Therefore, no impacts to special-status plants will result by constructing the Project.

Special-status and Non-status Wildlife Species

Nesting birds

A variety of non-status bird species whose nesting activities are protected by federal (Migratory Bird Treaty Act) and state regulations (Fish and Wildlife Code) have the potential to nest within the Study Area. Regulatory agencies (e.g., CDFW) typically treat February 1 through August 31 as the general nesting bird season. In order to avoid impacts to nesting birds, initial tree and other vegetation removal within the Study Area should be conducted from September 1 to January 31, outside of the nesting bird season. Work initiated between February 1 and August 31 should avoid impacts to nesting birds by implementing the following measures: (1) a qualified biologist should conduct a nesting bird survey no sooner than 14 days prior to start of work, and if no active nests are found, work may begin and no impacts to birds will result, (2) if active nests are found during the survey, the biologist should establish a protective buffer zone around the nest within which no work will be allowed, and once the young have fledged the nest or the nest becomes inactive (e.g., due to predation), then work may continue within the buffer zone area without restriction and no impacts to birds will result, (3) if work ceases for longer than 14 days, then measures 1 and 2 should be repeated. Buffers implemented may vary depending on the nesting species.

Special-status bats

Several species of bat, including common species and two (2) that have special status, have potential to occur on the Study Area due to the presence of large trees that may be used as roosts and habitat edges that could serve as foraging habitat. Given that tree removal is anticipated as a result of the Action, removal and trimming trees during the bat maternity season (generally April through October) could impact bat breeding and potentially result in the take of bats. WRA recommends that any tree removal occur outside of the bat maternity season. If this work window is not feasible, pre-construction bat roost assessments conducted by a qualified biologist no more than 14 at least 30 days prior to removal are recommended to determine if bats suitable roost habitat is present in the trees. If special-status bat species or maternity roosts are detected during these surveys, additional measures including avoidance of the roost trees until the end of the maternity roosting season may be recommended. If this is not feasible, appropriate species- and roost-specific mitigation measures should be developed in consultation with CDFW. Regardless of time of year, all felled trees should remain on the ground for at least 24 hours prior to chipping, off-site removal, or other processing to allow any bats to escape.

Summary

Based on the site visit and review of information pertinent to the Study Area, the construction of the Project will not result in significant impacts to special-status plant and wildlife species or to any sensitive habitats. Based on the Project schedule, the Project would have no impact to special-status and non-status nesting birds protected by the Migratory Bird Treaty Act and California Fish and Game Code.

Based on the evidence collected and analyzed, the Project would not substantially reduce the number or restrict the range of a rare, endangered or threatened plant or animal. The project would not cause a fish or wildlife population to drop below self-sustaining levels. The project would not adversely affect riparian habitat, wetlands, marshes, or other significant wildlife habitats. **The project will not result in any potentially significant adverse biological impacts to the environment.**

If you have questions or require additional information, please contact us.

Sincerely,

Gavin Albertoli

Gavin Albertoli, Biologist, ISA-Certified Arborist #WE-12027A
WRA, Inc.

ATTACHMENTS

Attachment A – Study Area Figures
Attachment B - Observed Plant Species within the Study Area
Attachment C - Special-Status Plant and Wildlife Species Database Search Results for the Study Area
Attachment D – Representative Photographs of the Study Area

References

Baldwin, B.G., D.H. Goldman, D.J. Keil, R. Patterson, T.J. Rosatti, and D.H. Wilken (eds.). 2012. The Jepson Manual: Vascular Plants of California, 2nd Edition. University of California Press, Berkeley, CA.

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Attachment A –

Study Area Figures

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Sources: National Geographic, WRA | Prepared By: njander, 1/23/2020

Figure 1. Study Area Regional Location Map

825 Drake Avenue Biological Site Assessment
Marin County, California

0 0.125 0.25 Miles

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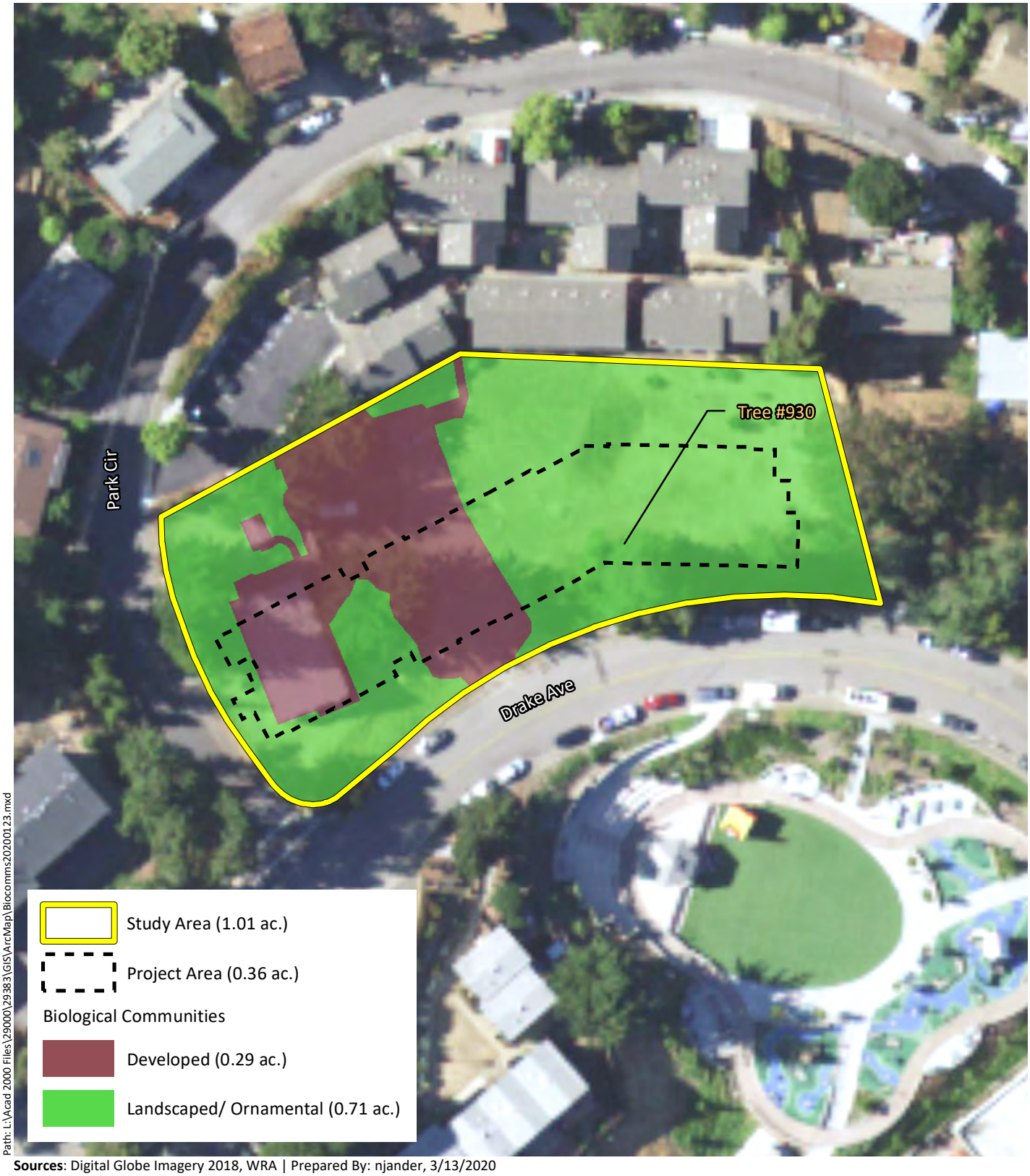

Sources: Digital Globe Imagery 2018, WRA | Prepared By: njander, 3/13/2020

Figure 2. Biological Communities in the Study Area

825 Drake Avenue Biological Site Assessment
Marin County, CA

0 50 100 Feet

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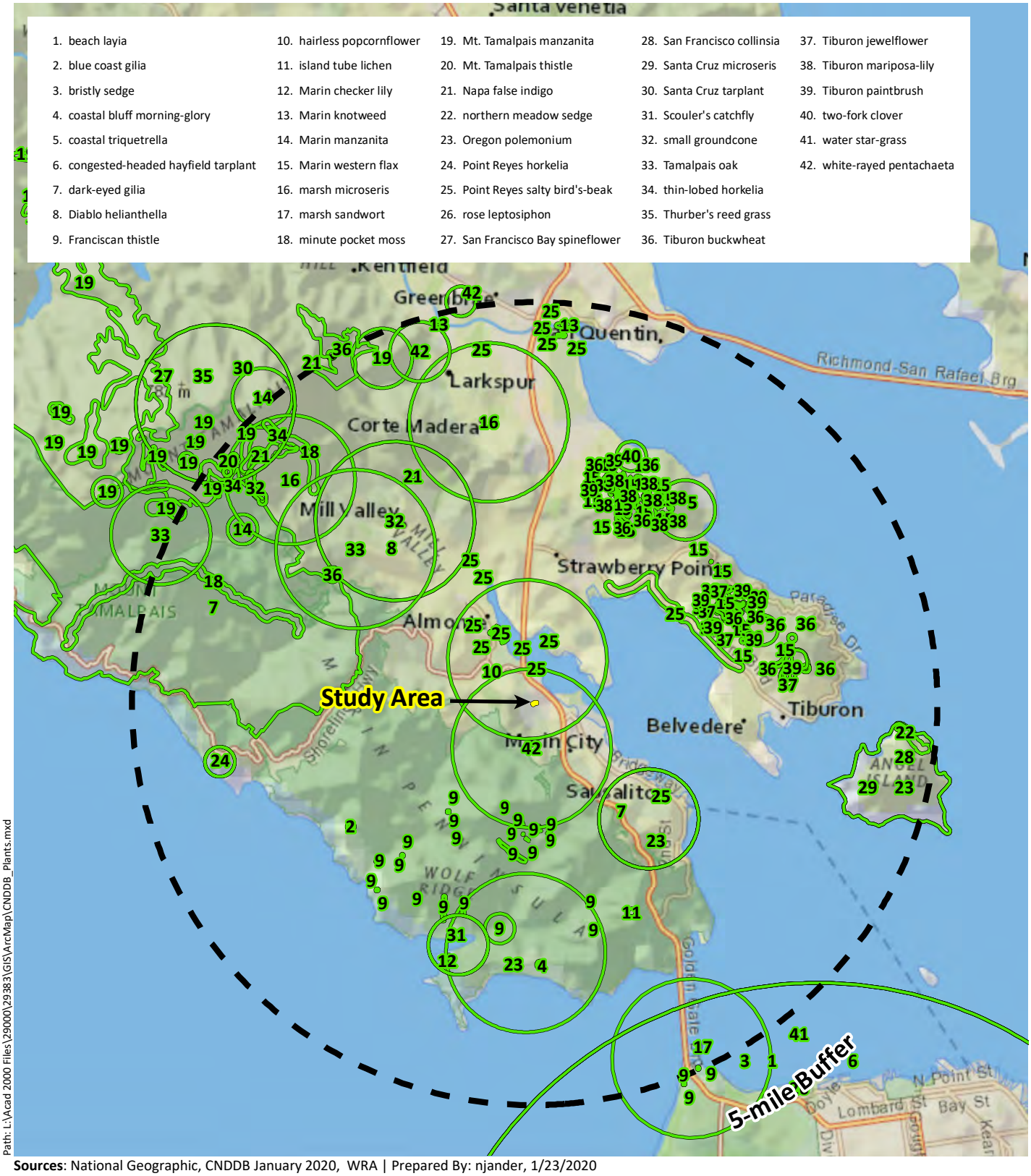

Sources: National Geographic, CNDDB January 2020, WRA | Prepared By: njander, 1/23/2020

Figure 3. Special-Status Plant Species Documented within 5-miles of the Study Area

825 Drake Avenue Biological Site Assessment
Marin County, California

0 1 2 Miles

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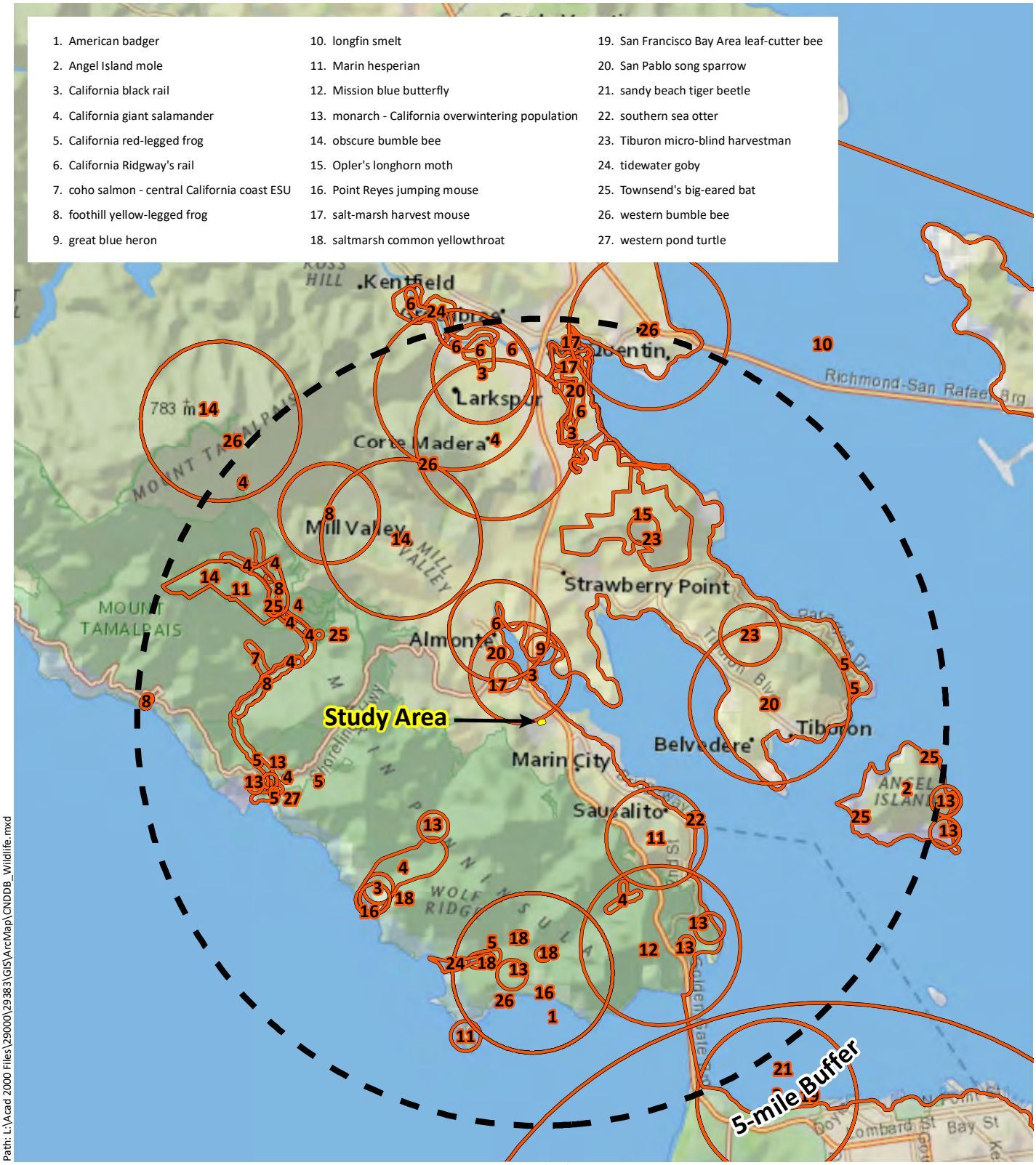

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Sources: National Geographic, CNDDB January 2020, WRA | Prepared By: njander, 1/23/2020

Figure 4. Special-Status Wildlife Species Documented within 5-miles of the Study Area

825 Drake Avenue Biological Site Assessment
Marin County, California

0 1 2 Miles

N

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Attachment B-

Observed Plant Species within the Study Area

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Attachment B. Plant Species Observed in the Study Area on December 27, 2019.

Scientific Name	Common Name	Origin	Form	Rarity Status[1]	CAL-IPC Status[2]	Wetland Status (AW 2016)[3]
Acacia dealbata	Silver wattle	non-native (invasive)	tree, shrub	-	Moderate	-
Acacia melanoxylon	Blackwood acacia	non-native	tree		Limited	
Avena sp.	-	-	-	-	-	-
Callistemon citrinus	Crimson bottle brush	non-native	tree, shrub			
Cirsium vulgare	Bullthistle	non-native (invasive)	perennial herb	-	Moderate	FACU
Cortaderia jubata	Andean pampas grass	non-native (invasive)	perennial grass	-	High	FACU
Cynodon dactylon	Bermuda grass	non-native (invasive)	perennial grass	-	Moderate	FACU
Cyperus eragrostis	Tall cyperus	native	perennial grass like herb	-	-	FACW
Delairea odorata	Cape ivy	non-native (invasive)	perennial herb	-	High	-
Eucalyptus globulus	Blue gum	non-native (invasive)	tree	-	Limited	-
Festuca perennis	Italian rye grass	non-native (invasive)	annual, perennial grass	-	Moderate	FAC
Genista monspessulana	French broom	non-native (invasive)	shrub	-	High	-
Helminthotheca echioides	Bristly ox-tongue	non-native (invasive)	annual, perennial herb	-	Limited	FAC
Hesperocyparis macrocarpa	Monterey cypress	native	tree	Rank 1B.2	-	-
Juniperus sp.	-	-	-	-	-	-
Oxalis pes-caprae	Bermuda buttercup	non-native (invasive)	perennial herb	-	Moderate	-
Phalaris aquatica	Harding grass	non-native (invasive)	perennial grass	-	Moderate	FACU
Pinus radiata	Monterey pine	native	tree	Rank 1B.1	-	-
Plantago lanceolata	Ribwort	non-native (invasive)	perennial herb	-	Limited	FAC

Scientific Name	Common Name	Origin	Form	Rarity Status[1]	CAL-IPC Status[2]	Wetland Status (AW 2016)[3]
Prunus cerasifera	Cherry plum	non-native (invasive)	tree	-	Limited	-
Quercus agrifolia	Coast live oak	native	tree	-	-	-
Rubus armeniacus	Himalayan blackberry	non-native (invasive)	shrub	-	High	FAC
Rumex pulcher	Fiddleleaf dock	non-native	perennial herb	-	-	FAC
Sequoia sempervirens	Coast redwood	native	tree	-	-	-
Trifolium repens	White clover	non-native	perennial herb	-	-	FACU

All species identified using the *Jepson Manual, 2nd Edition* (Baldwin et al. 2012) and *The Jepson Flora Project* (Jepson eFlora 2019); nomenclature follows *The Jepson Flora Project* (Jepson eFlora 2019) unless otherwise noted

Sp.: "species", intended to indicate that the observer was confident in the identity of the genus but uncertain which species
Cf.: intended to indicate a species appeared to the observer to be specific, but was not identified based on diagnostic characters

[1]Rare Status: The CNPS Inventory of Rare and Endangered Plants (CNPS 2019)
FE: Federal Endangered
FT: Federal Threatened
SE: State Endangered
ST: State Threatened
SR: State Rare
Rank 1A: Plants presumed extirpated in California and either rare or extinct elsewhere
Rank 1B: Plants rare, threatened, or endangered in California and elsewhere
Rank 2A: Plants presumed extirpated in California, but more common elsewhere
Rank 2B: Plants rare, threatened, or endangered in California, but more common elsewhere
Rank 3: Plants about which we need more information – a review list
Rank 4: Plants of limited distribution – a watch list

[2]Invasive Status: California Invasive Plant Inventory (Cal-IPC 2019)
High: Severe ecological impacts; high rates of dispersal and establishment; most are widely distributed ecologically.
Moderate: Substantial and apparent ecological impacts; moderate-high rates of dispersal, establishment dependent on disturbance; limited-moderate distribution ecologically
Limited: Minor or not well documented ecological impacts; low-moderate rate of invasiveness; limited distribution ecologically
Assessed: Assessed by Cal-IPC and determined to not be an existing current threat

[3]Wetland Status: National List of Plant Species that Occur in Wetlands, Arid West Region (Lichvar et al. 2016)

OBL:	Almost always a hydrophyte, rarely in uplands
FACW:	Usually a hydrophyte, but occasionally found in uplands
FAC:	Commonly either a hydrophyte or non-hydrophyte
FACU:	Occasionally a hydrophyte, but usually found in uplands
UPL:	Rarely a hydrophyte, almost always in uplands
NL:	Rarely a hydrophyte, almost always in uplands
NI:	No information; not factored during wetland delineation

Attachment C-

Special-Status Plant and Wildlife Species Database Search Results for the Study Area

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Selected Elements by Scientific Name

California Department of Fish and Wildlife

California Natural Diversity Database

Query Criteria: Quad IS (Point Bonita (3712275) OR San Rafael (3712285) OR San Quentin (3712284) OR San Francisco North (3712274))
 AND Taxonomic Group IS (Ferns OR Gymnosperms OR Monocots OR Dicots OR Lichens OR Bryophytes)

Species	Element Code	Federal Status	State Status	Global Rank	State Rank	Rare Plant Rank/CDFW SSC or FP
Amorpha californica var. napensis Napa false indigo	PDFAB08012	None	None	G4T2	S2	1B.2
Amsinckia lunaris bent-flowered fiddleneck	PDBOR01070	None	None	G3	S3	1B.2
Arctostaphylos franciscana Franciscan manzanita	PDERI040J3	Endangered	None	G1	S1	1B.1
Arctostaphylos montana ssp. montana Mt. Tamalpais manzanita	PDERI040J5	None	None	G3T3	S3	1B.3
Arctostaphylos montana ssp. ravenii Presidio manzanita	PDERI040J2	Endangered	Endangered	G3T1	S1	1B.1
Arctostaphylos virgata Marin manzanita	PDERI041K0	None	None	G2	S2	1B.2
Arenaria paludicola marsh sandwort	PDCAR040L0	Endangered	Endangered	G1	S1	1B.1
Astragalus tener var. tener alkali milk-vetch	PDFAB0F8R1	None	None	G2T1	S1	1B.2
Calamagrostis crassiglumis Thurber's reed grass	PMPOA17070	None	None	G3Q	S2	2B.1
Calochortus tiburonensis Tiburon mariposa-lily	PMLIL0D1C0	Threatened	Threatened	G1	S1	1B.1
Calystegia purpurata ssp. saxicola coastal bluff morning-glory	PDCON040D2	None	None	G4T2T3	S2S3	1B.2
Carex comosa bristly sedge	PMCYP032Y0	None	None	G5	S2	2B.1
Carex praticola northern meadow sedge	PMCYP03B20	None	None	G5	S2	2B.2
Castilleja affinis var. neglecta Tiburon paintbrush	PDSCR0D013	Endangered	Threatened	G4G5T1T2	S1S2	1B.2
Chloropyron maritimum ssp. palustre Point Reyes salty bird's-beak	PDSCR0J0C3	None	None	G4?T2	S2	1B.2
Chorizanthe cuspidata var. cuspidata San Francisco Bay spineflower	PDPGN04081	None	None	G2T1	S1	1B.2
Cirsium andrewsii Franciscan thistle	PDAST2E050	None	None	G3	S3	1B.2
Cirsium hydrophilum var. vaseyi Mt. Tamalpais thistle	PDAST2E1G2	None	None	G2T1	S1	1B.2

Species	Element Code	Federal Status	State Status	Global Rank	State Rank	Rare Plant Rank/CDFW SSC or FP
Clarkia franciscana Presidio clarkia	PDONA050H0	Endangered	Endangered	G1	S1	1B.1
Collinsia corymbosa round-headed Chinese-houses	PDSCR0H060	None	None	G1	S1	1B.2
Collinsia multicolor San Francisco collinsia	PDSCR0H0B0	None	None	G2	S2	1B.2
Dirca occidentalis western leatherwood	PDTHY03010	None	None	G2	S2	1B.2
Eriogonum luteolum var. caninum Tiburon buckwheat	PDPGN083S1	None	None	G5T2	S2	1B.2
Fissidens pauperculus minute pocket moss	NBMUS2W0U0	None	None	G3?	S2	1B.2
Fritillaria lanceolata var. tristulis Marin checker lily	PMLIL0V0P1	None	None	G5T2	S2	1B.1
Fritillaria liliacea fragrant fritillary	PMLIL0V0C0	None	None	G2	S2	1B.2
Gilia capitata ssp. chamissonis blue coast gilia	PDPLM040B3	None	None	G5T2	S2	1B.1
Gilia millefoliata dark-eyed gilia	PDPLM04130	None	None	G2	S2	1B.2
Grindelia hirsutula var. maritima San Francisco gumplant	PDAST470D3	None	None	G5T1Q	S1	3.2
Helianthella castanea Diablo helianthella	PDAST4M020	None	None	G2	S2	1B.2
Hemizonia congesta ssp. congesta congested-headed hayfield tarplant	PDAST4R065	None	None	G5T2	S2	1B.2
Hesperolinon congestum Marin western flax	PDLIN01060	Threatened	Threatened	G1	S1	1B.1
Heteranthera dubia water star-grass	PMPON03010	None	None	G5	S2	2B.2
Holocarpha macradenia Santa Cruz tarplant	PDAST4X020	Threatened	Endangered	G1	S1	1B.1
Horkelia cuneata var. sericea Kellogg's horkelia	PDROS0W043	None	None	G4T1?	S1?	1B.1
Horkelia marinensis Point Reyes horkelia	PDROS0W0B0	None	None	G2	S2	1B.2
Horkelia tenuiloba thin-lobed horkelia	PDROS0W0E0	None	None	G2	S2	1B.2
Hypogymnia schizidiata island tube lichen	NLT0032640	None	None	G2G3	S2	1B.3
Kopsiopsis hookeri small groundcone	PDORO01010	None	None	G4?	S1S2	2B.3

Species	Element Code	Federal Status	State Status	Global Rank	State Rank	Rare Plant Rank/CDFW SSC or FP
Layia carnosa beach layia	PDAST5N010	Endangered	Endangered	G2	S2	1B.1
Leptosiphon rosaceus rose leptosiphon	PDPLM09180	None	None	G1	S1	1B.1
Lessingia germanorum San Francisco lessingia	PDAST5S010	Endangered	Endangered	G1	S1	1B.1
Lessingia micradenia var. micradenia Tamalpais lessingia	PDAST5S063	None	None	G2T2	S2	1B.2
Microseris paludosa marsh microseris	PDAST6E0D0	None	None	G2	S2	1B.2
Navarretia rosulata Marin County navarretia	PDPLM0C0Z0	None	None	G2	S2	1B.2
Pentachaeta bellidiflora white-rayed pentachaeta	PDAST6X030	Endangered	Endangered	G1	S1	1B.1
Plagiobothrys chorisianus var. chorisianus Choris' popcornflower	PDBOR0V061	None	None	G3T1Q	S1	1B.2
Plagiobothrys diffusus San Francisco popcornflower	PDBOR0V080	None	Endangered	G1Q	S1	1B.1
Plagiobothrys glaber hairless popcornflower	PDBOR0V0B0	None	None	GH	SH	1A
Pleuropogon hooverianus North Coast semaphore grass	PMPOA4Y070	None	Threatened	G2	S2	1B.1
Polemonium carneum Oregon polemonium	PDPLM0E050	None	None	G3G4	S2	2B.2
Polygonum marinense Marin knotweed	PDPGN0L1C0	None	None	G2Q	S2	3.1
Quercus parvula var. tamalpaisensis Tamalpais oak	PDFAG051Q3	None	None	G4T2	S2	1B.3
Sanicula maritima adobe sanicle	PDAPI1Z0D0	None	Rare	G2	S2	1B.1
Sidalcea calycosa ssp. rhizomata Point Reyes checkerbloom	PDMAL11012	None	None	G5T2	S2	1B.2
Sidalcea hickmanii ssp. viridis Marin checkerbloom	PDMAL110A4	None	None	G3TH	SH	1B.1
Silene scouleri ssp. scouleri Scouler's catchfly	PDCAR0U1MC	None	None	G5T4T5	S2S3	2B.2
Silene verecunda ssp. verecunda San Francisco campion	PDCAR0U213	None	None	G5T1	S1	1B.2
Spergularia macrotheca var. longistyla long-styled sand-spurrey	PDCAR0W062	None	None	G5T2	S2	1B.2
Stebbinsoseris decipiens Santa Cruz microseris	PDAST6E050	None	None	G2	S2	1B.2

Species	Element Code	Federal Status	State Status	Global Rank	State Rank	Rare Plant Rank/CDFW SSC or FP
Streptanthus batrachopus Tamalpais jewelflower	PDBRA2G050	None	None	G2	S2	1B.3
Streptanthus glandulosus ssp. niger Tiburon jewelflower	PDBRA2G0T0	Endangered	Endangered	G4T1	S1	1B.1
Streptanthus glandulosus ssp. pulchellus Mt. Tamalpais bristly jewelflower	PDBRA2G0J2	None	None	G4T2	S2	1B.2
Symphyotrichum lentum Suisun Marsh aster	PDASTE8470	None	None	G2	S2	1B.2
Trifolium amoenum two-fork clover	PDFAB40040	Endangered	None	G1	S1	1B.1
Trifolium hydrophilum saline clover	PDFAB400R5	None	None	G2	S2	1B.2
Triphysaria floribunda San Francisco owl's-clover	PDSCR2T010	None	None	G2?	S2?	1B.2
Triquetrella californica coastal triquetrella	NBMUS7S010	None	None	G2	S2	1B.2

Record Count: 68

Selected Elements by Scientific Name

California Department of Fish and Wildlife

California Natural Diversity Database

Query Criteria: Quad IS (Point Bonita (3712275) OR San Rafael (3712285) OR San Quentin (3712284) OR San Francisco North (3712274))
 AND Taxonomic Group IS (Fish OR Amphibians OR Reptiles OR Birds OR Mammals OR Mollusks OR Arachnids OR Crustaceans OR Insects)

Species	Element Code	Federal Status	State Status	Global Rank	State Rank	Rare Plant Rank/CDFW SSC or FP
Accipiter cooperii Cooper's hawk	ABNKC12040	None	None	G5	S4	WL
Adela oplerella Opler's longhorn moth	IILEE0G040	None	None	G2	S2	
Antrozous pallidus pallid bat	AMACC10010	None	None	G5	S3	SSC
Ardea alba great egret	ABNGA04040	None	None	G5	S4	
Ardea herodias great blue heron	ABNGA04010	None	None	G5	S4	
Asio flammeus short-eared owl	ABNSB13040	None	None	G5	S3	SSC
Bombus caliginosus obscure bumble bee	IIHYM24380	None	None	G4?	S1S2	
Bombus occidentalis western bumble bee	IIHYM24250	None	Candidate Endangered	G2G3	S1	
Cicindela hirticollis gravida sandy beach tiger beetle	IICOL02101	None	None	G5T2	S2	
Circus hudsonius northern harrier	ABNKC11011	None	None	G5	S3	SSC
Corynorhinus townsendii Townsend's big-eared bat	AMACC08010	None	None	G3G4	S2	SSC
Danaus plexippus pop. 1 monarch - California overwintering population	IILEPP2012	None	None	G4T2T3	S2S3	
Dicamptodon ensatus California giant salamander	AAAAH01020	None	None	G3	S2S3	SSC
Egretta thula snowy egret	ABNGA06030	None	None	G5	S4	
Elanus leucurus white-tailed kite	ABNKC06010	None	None	G5	S3S4	FP
Emys marmorata western pond turtle	ARAAD02030	None	None	G3G4	S3	SSC
Enhydra lutris nereis southern sea otter	AMAJF09012	Threatened	None	G4T2	S2	FP
Erethizon dorsatum North American porcupine	AMAFJ01010	None	None	G5	S3	

Species	Element Code	Federal Status	State Status	Global Rank	State Rank	Rare Plant Rank/CDFW SSC or FP
Eucyclogobius newberryi tidewater goby	AFCQN04010	Endangered	None	G3	S3	SSC
Euphydryas editha bayensis Bay checkerspot butterfly	IILEPK4055	Threatened	None	G5T1	S1	
Falco peregrinus anatum American peregrine falcon	ABNKD06071	Delisted	Delisted	G4T4	S3S4	FP
Geothlypis trichas sinuosa saltmarsh common yellowthroat	ABPBX1201A	None	None	G5T3	S3	SSC
Lasiurus blossevillii western red bat	AMACC05060	None	None	G5	S3	SSC
Lasiurus cinereus hoary bat	AMACC05030	None	None	G5	S4	
Laterallus jamaicensis coturniculus California black rail	ABNME03041	None	Threatened	G3G4T1	S1	FP
Lichnanthe ursina bumblebee scarab beetle	IICOL67020	None	None	G2	S2	
Melospiza melodia pusillula Alameda song sparrow	ABPBXA301S	None	None	G5T2?	S2S3	SSC
Melospiza melodia samuelis San Pablo song sparrow	ABPBXA301W	None	None	G5T2	S2	SSC
Microcina tiburona Tiburon micro-blind harvestman	ILARA47060	None	None	G1	S1	
Microtus californicus sanpabloensis San Pablo vole	AMAFF11034	None	None	G5T1T2	S1S2	SSC
Nycticorax nycticorax black-crowned night heron	ABNGA11010	None	None	G5	S4	
Oncorhynchus kisutch pop. 4 coho salmon - central California coast ESU	AFCHA02034	Endangered	Endangered	G4	S2?	
Phalacrocorax auritus double-crested cormorant	ABNFD01020	None	None	G5	S4	WL
Plebejus icarioides missionensis Mission blue butterfly	IILEPG801A	Endangered	None	G5T1	S1	
Pomatiopsis binneyi robust walker	IMGASJ9010	None	None	G1	S1	
Rallus obsoletus obsoletus California Ridgway's rail	ABNME05011	Endangered	Endangered	G5T1	S1	FP
Rana boylii foothill yellow-legged frog	AAABH01050	None	Candidate Threatened	G3	S3	SSC
Rana draytonii California red-legged frog	AAABH01022	Threatened	None	G2G3	S2S3	SSC
Reithrodontomys raviventris salt-marsh harvest mouse	AMAFF02040	Endangered	Endangered	G1G2	S1S2	FP

Species	Element Code	Federal Status	State Status	Global Rank	State Rank	Rare Plant Rank/CDFW SSC or FP
Riparia riparia bank swallow	ABPAU08010	None	Threatened	G5	S2	
Scapanus latimanus insularis Angel Island mole	AMABB02032	None	None	G5THQ	SH	
Sorex vagrans halicoetes salt-marsh wandering shrew	AMABA01071	None	None	G5T1	S1	SSC
Speyeria callippe callippe callippe silverspot butterfly	IILEPJ6091	Endangered	None	G5T1	S1	
Spirinchus thaleichthys longfin smelt	AFCHB03010	Candidate	Threatened	G5	S1	
Taxidea taxus American badger	AMAJF04010	None	None	G5	S3	SSC
Thaleichthys pacificus eulachon	AFCHB04010	Threatened	None	G5	S3	
Trachusa gummifera San Francisco Bay Area leaf-cutter bee	IIHYM80010	None	None	G1	S1	
Tryonia imitator mimic tryonia (=California brackishwater snail)	IMGASJ7040	None	None	G2	S2	
Vespericola marinensis Marin hesperian	IMGASA4140	None	None	G2	S2	
Zapus trinotatus orarius Point Reyes jumping mouse	AMAFH01031	None	None	G5T1T3Q	S1S3	SSC

Record Count: 50

CNPS California Native Plant Society

Inventory of Rare and Endangered Plants

*The database used to provide updates to the Online Inventory is under construction. View updates and changes made since May 2019 here.

Plant List

94 matches found. *Click on scientific name for details*

Search Criteria

Found in Quads 3712285, 3712284 3712275 and 3712274;

Modify Search Criteria | Export to Excel | Modify Columns | Modify Sort | Display Photos

Scientific Name	Common Name	Family	Lifeform	Blooming Period	CA Rare Plant Rank	State Rank	Global Rank
Amorpha californica var. napensis	Napa false indigo	Fabaceae	perennial deciduous shrub	Apr-Jul	1B.2	S2	G4T2
Amsinckia lunaris	bent-flowered fiddleneck	Boraginaceae	annual herb	Mar-Jun	1B.2	S3	G3
Arabis blepharophylla	coast rockcress	Brassicaceae	perennial herb	Feb-May	4.3	S4	G4
Arctostaphylos franciscana	Franciscan manzanita	Ericaceae	perennial evergreen shrub	Feb-Apr	1B.1	S1	G1
Arctostaphylos montana ssp. montana	Mt. Tamalpais manzanita	Ericaceae	perennial evergreen shrub	Feb-Apr	1B.3	S3	G3T3
Arctostaphylos montana ssp. ravenii	Presidio manzanita	Ericaceae	perennial evergreen shrub	Feb-Mar	1B.1	S1	G3T1
Arctostaphylos virgata	Marin manzanita	Ericaceae	perennial evergreen shrub	Jan-Mar	1B.2	S2	G2
Arenaria paludicola	marsh sandwort	Caryophyllaceae	perennial stoloniferous herb	May-Aug	1B.1	S1	G1
Aspidotis carlotta-halliae	Carlotta Hall's lace fern	Pteridaceae	perennial rhizomatous herb	Jan-Dec	4.2	S3	G3
Astragalus breweri	Brewer's milk-vetch	Fabaceae	annual herb	Apr-Jun	4.2	S3	G3
Astragalus nuttallii var. nuttallii	ocean bluff milk-vetch	Fabaceae	perennial herb	Jan-Nov	4.2	S4	G4T4
Astragalus tener var. tener	alkali milk-vetch	Fabaceae	annual herb	Mar-Jun	1B.2	S1	G2T1

Calamagrostis crassiglumis	Thurber's reed grass	Poaceae	perennial rhizomatous herb	May-Aug	2B.1	S2	G3Q
Calamagrostis ophitidis	serpentine reed grass	Poaceae	perennial herb	Apr-Jul	4.3	S3	G3
Calandrinia breweri	Brewer's calandrinia	Montiaceae	annual herb	(Jan)Mar-Jun	4.2	S4	G4
Calochortus tiburonensis	Tiburon mariposa lily	Liliaceae	perennial bulbiferous herb	Mar-Jun	1B.1	S1	G1
Calochortus umbellatus	Oakland star-tulip	Liliaceae	perennial bulbiferous herb	Mar-May	4.2	S3?	G3?
Calystegia purpurata ssp. saxicola	coastal bluff morning-glory	Convolvulaceae	perennial herb	(Mar)Apr-Sep	1B.2	S2S3	G4T2T3
Carex comosa	bristly sedge	Cyperaceae	perennial rhizomatous herb	May-Sep	2B.1	S2	G5
Carex praticola	northern meadow sedge	Cyperaceae	perennial herb	May-Jul	2B.2	S2	G5
Castilleja affinis var. neglecta	Tiburon paintbrush	Orobanchaceae	perennial herb (hemiparasitic)	Apr-Jun	1B.2	S1S2	G4G5T1T2
Castilleja ambigua var. ambigua	johnny-nip	Orobanchaceae	annual herb (hemiparasitic)	Mar-Aug	4.2	S3S4	G4T4
Ceanothus gloriosus var. exaltatus	glory brush	Rhamnaceae	perennial evergreen shrub	Mar-Jun(Aug)	4.3	S4	G4T4
Ceanothus pinetorum	Kern ceanothus	Rhamnaceae	perennial evergreen shrub	May-Jul	4.3	S3	G3
Ceanothus rigidus	Monterey ceanothus	Rhamnaceae	perennial evergreen shrub	Feb-Apr(Jun)	4.2	S4	G4
Chloropyron maritimum ssp. palustre	Point Reyes bird's-beak	Orobanchaceae	annual herb (hemiparasitic)	Jun-Oct	1B.2	S2	G4?T2
Chorizanthe cuspidata var. cuspidata	San Francisco Bay spineflower	Polygonaceae	annual herb	Apr-Jul(Aug)	1B.2	S1	G2T1
Chorizanthe valida	Sonoma spineflower	Polygonaceae	annual herb	Jun-Aug	1B.1	S1	G1
Cirsium andrewsii	Franciscan thistle	Asteraceae	perennial herb	Mar-Jul	1B.2	S3	G3
Cirsium hydrophilum var. vaseyi	Mt. Tamalpais thistle	Asteraceae	perennial herb	May-Aug	1B.2	S1	G2T1
Cistanthe maritima	seaside cistanthe	Montiaceae	annual herb	(Feb)Mar-Jun(Aug)	4.2	S3	G3G4
Clarkia franciscana	Presidio clarkia	Onagraceae	annual herb	May-Jul	1B.1	S1	G1
Collinsia corymbosa	round-headed Chinese-houses	Plantaginaceae	annual herb	Apr-Jun	1B.2	S1	G1
Collinsia multicolor	San Francisco collinsia	Plantaginaceae	annual herb	(Feb)Mar-May	1B.2	S2	G2
Cypripedium californicum	California lady's-slipper	Orchidaceae	perennial rhizomatous herb	Apr-Aug(Sep)	4.2	S4	G4
Dirca occidentalis	western leatherwood	Thymelaeaceae	perennial deciduous shrub	Jan-Mar(Apr)	1B.2	S2	G2
Elymus californicus	California bottle-brush grass	Poaceae	perennial herb	May-Aug(Nov)	4.3	S4	G4
Eriogonum luteolum var. caninum	Tiburon buckwheat	Polygonaceae	annual herb	May-Sep	1B.2	S2	G5T2
Eriophorum gracile	slender cottongrass	Cyperaceae	perennial rhizomatous herb	May-Sep	4.3	S4	G5

			(emergent)				
Erysimum franciscanum	San Francisco wallflower	Brassicaceae	perennial herb	Mar-Jun	4.2	S3	G3
Fissidens pauperculus	minute pocket moss	Fissidentaceae	moss		1B.2	S2	G3?
Fritillaria lanceolata var. tristulis	Marin checker lily	Liliaceae	perennial bulbiferous herb	Feb-May	1B.1	S2	G5T2
Fritillaria liliacea	fragrant fritillary	Liliaceae	perennial bulbiferous herb	Feb-Apr	1B.2	S2	G2
Gilia capitata ssp. chamissonis	blue coast gilia	Polemoniaceae	annual herb	Apr-Jul	1B.1	S2	G5T2
Gilia capitata ssp. tomentosa	woolly-headed gilia	Polemoniaceae	annual herb	May-Jul	1B.1	S1	G5T1
Gilia millefoliata	dark-eyed gilia	Polemoniaceae	annual herb	Apr-Jul	1B.2	S2	G2
Grindelia hirsutula var. maritima	San Francisco gumplant	Asteraceae	perennial herb	Jun-Sep	3.2	S1	G5T1Q
Helianthella castanea	Diablo helianthella	Asteraceae	perennial herb	Mar-Jun	1B.2	S2	G2
Hemizonia congesta ssp. congesta	congested-headed hayfield tarplant	Asteraceae	annual herb	Apr-Nov	1B.2	S2	G5T2
Hesperolinon congestum	Marin western flax	Linaceae	annual herb	Apr-Jul	1B.1	S1	G1
Heteranthera dubia	water star-grass	Pontederiaceae	perennial herb (aquatic)	Jul-Oct	2B.2	S2	G5
Holocarpha macradenia	Santa Cruz tarplant	Asteraceae	annual herb	Jun-Oct	1B.1	S1	G1
Horkelia cuneata var. sericea	Kellogg's horkelia	Rosaceae	perennial herb	Apr-Sep	1B.1	S1?	G4T1?
Horkelia marinensis	Point Reyes horkelia	Rosaceae	perennial herb	May-Sep	1B.2	S2	G2
Horkelia tenuiloba	thin-lobed horkelia	Rosaceae	perennial herb	May-Jul(Aug)	1B.2	S2	G2
Hypogymnia schizidiata	island rock lichen	Parmeliaceae	foliose lichen (null)		1B.3	S1	G2
Iris longipetala	coast iris	Iridaceae	perennial rhizomatous herb	Mar-May	4.2	S3	G3
Kopsiopsis hookeri	small groundcone	Orobanchaceae	perennial rhizomatous herb (parasitic)	Apr-Aug	2B.3	S1S2	G4?
Layia carnosa	beach layia	Asteraceae	annual herb	Mar-Jul	1B.1	S2	G2
Leptosiphon acicularis	bristly leptosiphon	Polemoniaceae	annual herb	Apr-Jul	4.2	S4?	G4?
Leptosiphon grandiflorus	large-flowered leptosiphon	Polemoniaceae	annual herb	Apr-Aug	4.2	S3S4	G3G4
Leptosiphon rosaceus	rose leptosiphon	Polemoniaceae	annual herb	Apr-Jul	1B.1	S1	G1
Lessingia germanorum	San Francisco lessingia	Asteraceae	annual herb	(Jun)Jul-Nov	1B.1	S1	G1
Lessingia hololeuca	woolly-headed lessingia	Asteraceae	annual herb	Jun-Oct	3	S2S3	G3?
Lessingia micradenia var. micradenia	Tamalpais lessingia	Asteraceae	annual herb	(Jun)Jul-Oct	1B.2	S2	G2T2
Micropus amphibolus	Mt. Diablo cottonweed	Asteraceae	annual herb	Mar-May	3.2	S3S4	G3G4
Microseris paludosa	marsh microseris	Asteraceae	perennial herb	Apr-Jun(Jul)	1B.2	S2	G2

Navarretia leucocephala ssp. bakeri	Baker's navarretia	Polemoniaceae	annual herb	Apr-Jul	1B.1	S2	G4T2
Navarretia rosulata	Marin County navarretia	Polemoniaceae	annual herb	May-Jul	1B.2	S2	G2
Pentachaeta bellidiflora	white-rayed pentachaeta	Asteraceae	annual herb	Mar-May	1B.1	S1	G1
Perideridia gairdneri ssp. gairdneri	Gairdner's yampah	Apiaceae	perennial herb	Jun-Oct	4.2	S3S4	G5T3T4
Piperia michaelii	Michael's rein orchid	Orchidaceae	perennial herb	Apr-Aug	4.2	S3	G3
Plagiobothrys chorisianus var. chorisianus	Choris' popcornflower	Boraginaceae	annual herb	Mar-Jun	1B.2	S1	G3T1Q
Plagiobothrys diffusus	San Francisco popcornflower	Boraginaceae	annual herb	Mar-Jun	1B.1	S1	G1Q
Plagiobothrys glaber	hairless popcornflower	Boraginaceae	annual herb	Mar-May	1A	SH	GH
Pleuropogon hooverianus	North Coast semaphore grass	Poaceae	perennial rhizomatous herb	Apr-Jun	1B.1	S2	G2
Polemonium carneum	Oregon polemonium	Polemoniaceae	perennial herb	Apr-Sep	2B.2	S2	G3G4
Polygonum marinense	Marin knotweed	Polygonaceae	annual herb	(Apr)May-Aug(Oct)	3.1	S2	G2Q
Quercus parvula var. tamalpaisensis	Tamalpais oak	Fagaceae	perennial evergreen shrub	Mar-Apr	1B.3	S2	G4T2
Ranunculus lobbii	Lobb's aquatic buttercup	Ranunculaceae	annual herb (aquatic)	Feb-May	4.2	S3	G4
Sanicula maritima	adobe sanicle	Apiaceae	perennial herb	Feb-May	1B.1	S2	G2
Sidalcea calycosa ssp. rhizomata	Point Reyes checkerbloom	Malvaceae	perennial rhizomatous herb	Apr-Sep	1B.2	S2	G5T2
Silene scouleri ssp. scouleri	Scouler's catchfly	Caryophyllaceae	perennial herb	(Mar-May)Jun-Aug(Sep)	2B.2	S2S3	G5T4T5
Silene verecunda ssp. verecunda	San Francisco campion	Caryophyllaceae	perennial herb	(Feb)Mar-Jun(Aug)	1B.2	S1	G5T1
Spergularia macrotheca var. longistyla	long-styled sand-spurrey	Caryophyllaceae	perennial herb	Feb-May(Jun)	1B.2	S2	G5T2
Stebbinsoseris decipiens	Santa Cruz microseris	Asteraceae	annual herb	Apr-May	1B.2	S2	G2
Streptanthus batrachopus	Tamalpais jewelflower	Brassicaceae	annual herb	Apr-Jul	1B.3	S2	G2
Streptanthus glandulosus ssp. niger	Tiburon jewelflower	Brassicaceae	annual herb	May-Jun	1B.1	S1	G4T1
Streptanthus glandulosus ssp. pulchellus	Mt. Tamalpais bristly jewelflower	Brassicaceae	annual herb	May-Jul(Aug)	1B.2	S2	G4T2
Symphyotrichum lentum	Suisun Marsh aster	Asteraceae	perennial rhizomatous herb	(Apr)May-Nov	1B.2	S2	G2
	two-fork clover	Fabaceae	annual herb	Apr-Jun	1B.1	S1	G1

Trifolium amoenum							
Trifolium hydrophilum	saline clover	Fabaceae	annual herb	Apr-Jun	1B.2	S2	G2
Triphysaria floribunda	San Francisco owl's-clover	Orobanchaceae	annual herb	Apr-Jun	1B.2	S2?	G2?
Triquetrella californica	coastal triquetrella	Pottiaceae	moss		1B.2	S2	G2

Suggested Citation

California Native Plant Society, Rare Plant Program. 2019. Inventory of Rare and Endangered Plants of California (online edition, v8-03 0.39). Website http://www.rareplants.cnps.org [accessed 27 December 2019].

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IPaC **U.S. Fish & Wildlife Service**

IPaC resource list

This report is an automatically generated list of species and other resources such as critical habitat (collectively referred to as *trust resources*) under the U.S. Fish and Wildlife Service's (USFWS) jurisdiction that are known or expected to be on or near the project area referenced below. The list may also include trust resources that occur outside of the project area, but that could potentially be directly or indirectly affected by activities in the project area. However, determining the likelihood and extent of effects a project may have on trust resources typically requires gathering additional site-specific (e.g., vegetation/species surveys) and project-specific (e.g., magnitude and timing of proposed activities) information.

Below is a summary of the project information you provided and contact information for the USFWS office(s) with jurisdiction in the defined project area. Please read the introduction to each section that follows (Endangered Species, Migratory Birds, USFWS Facilities, and NWI Wetlands) for additional information applicable to the trust resources addressed in that section.

NOT FOR CONSULTATION

Location

Marin and San Francisco counties, California

Local offices

Sacramento Fish And Wildlife Office

(916) 414-6600
(916) 414-6713

Federal Building
2800 Cottage Way, Room W-2605
Sacramento, CA 95825-1846

San Francisco Bay-Delta Fish And Wildlife

(916) 930-5603
(916) 930-5654

650 Capitol Mall
Suite 8-300
Sacramento, CA 95814

http://kim_squires@fws.gov

NOT FOR CONSULTATION

Endangered species

This resource list is for informational purposes only and does not constitute an analysis of project level impacts.

The primary information used to generate this list is the known or expected range of each species. Additional areas of influence (AOI) for species are also considered. An AOI includes areas outside of the species range if the species could be indirectly affected by activities in that area (e.g., placing a dam upstream of a fish population, even if that fish does not occur at the dam site, may indirectly impact the species by reducing or eliminating water flow downstream). Because species can move, and site conditions can change, the species on this list are not guaranteed to be found on or near the project area. To fully determine any potential effects to species, additional site-specific and project-specific information is often required.

Section 7 of the Endangered Species Act **requires** Federal agencies to "request of the Secretary information whether any species which is listed or proposed to be listed may be present in the area of such proposed action" for any project that is conducted, permitted, funded, or licensed by any Federal agency. A letter from the local office and a species list which fulfills this requirement can **only** be obtained by requesting an official species list from either the Regulatory Review section in IPaC (see directions below) or from the local field office directly.

For project evaluations that require USFWS concurrence/review, please return to the IPaC website and request an official species list by doing the following:

1. Draw the project location and click CONTINUE.
2. Click DEFINE PROJECT.
3. Log in (if directed to do so).
4. Provide a name and description for your project.
5. Click REQUEST SPECIES LIST.

Listed species[1] and their critical habitats are managed by the Ecological Services Program of the U.S. Fish and Wildlife Service (USFWS) and the fisheries division of the National Oceanic and Atmospheric Administration (NOAA Fisheries[2]).

Species and critical habitats under the sole responsibility of NOAA Fisheries are **not** shown on this list. Please contact NOAA Fisheries for species under their jurisdiction.

NOT FOR CONSULTATION

1. Species listed under the Endangered Species Act are threatened or endangered; IPaC also shows species that are candidates, or proposed, for listing. See the listing status page for more information.
2. NOAA Fisheries, also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

The following species are potentially affected by activities in this location:

Mammals

NAME	STATUS

Salt Marsh Harvest Mouse Reithrodontomys raviventris — Endangered
No critical habitat has been designated for this species.
https://ecos.fws.gov/ecp/species/613

Southern Sea Otter Enhydra lutris nereis — Threatened
Marine mammal
No critical habitat has been designated for this species.
https://ecos.fws.gov/ecp/species/8560

Birds

NAME	STATUS

California Clapper Rail Rallus longirostris obsoletus — Endangered
No critical habitat has been designated for this species.
https://ecos.fws.gov/ecp/species/4240

California Least Tern Sterna antillarum browni — Endangered
No critical habitat has been designated for this species.
https://ecos.fws.gov/ecp/species/8104

Marbled Murrelet Brachyramphus marmoratus — Threatened
There is **final** critical habitat for this species. Your location overlaps the critical habitat.
https://ecos.fws.gov/ecp/species/4467

Northern Spotted Owl Strix occidentalis caurina — Threatened
There is **final** critical habitat for this species. Your location overlaps the critical habitat.
https://ecos.fws.gov/ecp/species/1123

Short-tailed Albatross Phoebastria (=Diomedea) albatrus — Endangered
No critical habitat has been designated for this species.
https://ecos.fws.gov/ecp/species/433

Western Snowy Plover Charadrius nivosus nivosus — Threatened
There is **final** critical habitat for this species. Your location is outside the critical habitat.
https://ecos.fws.gov/ecp/species/8035

Yellow-billed Cuckoo Coccyzus americanus — Threatened
There is **proposed** critical habitat for this species. Your location is outside the critical habitat.
https://ecos.fws.gov/ecp/species/3911

Reptiles

NAME	STATUS

NOT FOR CONSULTATION

Green Sea Turtle Chelonia mydas — Threatened
No critical habitat has been designated for this species.
https://ecos.fws.gov/ecp/species/6199

Amphibians

NAME	STATUS
California Red-legged Frog Rana draytonii There is **final** critical habitat for this species. Your location is outside the critical habitat. https://ecos.fws.gov/ecp/species/2891	Threatened

Fishes

NAME	STATUS
Delta Smelt Hypomesus transpacificus There is **final** critical habitat for this species. Your location is outside the critical habitat. https://ecos.fws.gov/ecp/species/321	Threatened
Tidewater Goby Eucyclogobius newberryi There is **final** critical habitat for this species. Your location overlaps the critical habitat. https://ecos.fws.gov/ecp/species/57	Endangered

Insects

NAME	STATUS
Bay Checkerspot Butterfly Euphydryas editha bayensis There is **final** critical habitat for this species. Your location is outside the critical habitat. https://ecos.fws.gov/ecp/species/2320	Threatened
Callippe Silverspot Butterfly Speyeria callippe callippe There is **proposed** critical habitat for this species. The location of the critical habitat is not available. https://ecos.fws.gov/ecp/species/3779	Endangered
Mission Blue Butterfly Icaricia icarioides missionensis There is **proposed** critical habitat for this species. The location of the critical habitat is not available. https://ecos.fws.gov/ecp/species/6928	Endangered
Myrtle's Silverspot Butterfly Speyeria zerene myrtleae No critical habitat has been designated for this species. https://ecos.fws.gov/ecp/species/6929	Endangered

NOT FOR CONSULTATION

San Bruno Elfin Butterfly Callophrys mossii bayensis There is **proposed** critical habitat for this species. The location of the critical habitat is not available. https://ecos.fws.gov/ecp/species/3394	Endangered

Flowering Plants

NAME	STATUS
Franciscan Manzanita Arctostaphylos franciscana There is **final** critical habitat for this species. Your location is outside the critical habitat. https://ecos.fws.gov/ecp/species/5350	Endangered
Marin Dwarf-flax Hesperolinon congestum No critical habitat has been designated for this species. https://ecos.fws.gov/ecp/species/5363	Threatened
Marsh Sandwort Arenaria paludicola No critical habitat has been designated for this species. https://ecos.fws.gov/ecp/species/2229	Endangered
Presidio Clarkia Clarkia franciscana No critical habitat has been designated for this species. https://ecos.fws.gov/ecp/species/3890	Endangered
Presidio Manzanita Arctostaphylos hookeri var. ravenii No critical habitat has been designated for this species. https://ecos.fws.gov/ecp/species/7216	Endangered
San Francisco Lessingia Lessingia germanorum (=L.g. var. germanorum) No critical habitat has been designated for this species. https://ecos.fws.gov/ecp/species/8174	Endangered
Santa Cruz Tarplant Holocarpha macradenia There is **final** critical habitat for this species. Your location is outside the critical habitat. https://ecos.fws.gov/ecp/species/6832	Threatened
Showy Indian Clover Trifolium amoenum No critical habitat has been designated for this species. https://ecos.fws.gov/ecp/species/6459	Endangered
Sonoma Sunshine Blennosperma bakeri No critical habitat has been designated for this species. https://ecos.fws.gov/ecp/species/1260	Endangered

NOT FOR CONSULTATION

Tiburon Jewelflower Streptanthus niger No critical habitat has been designated for this species. https://ecos.fws.gov/ecp/species/4187	Endangered
Tiburon Mariposa Lily Calochortus tiburonensis No critical habitat has been designated for this species. https://ecos.fws.gov/ecp/species/2858	Threatened
Tiburon Paintbrush Castilleja affinis ssp. neglecta No critical habitat has been designated for this species. https://ecos.fws.gov/ecp/species/2687	Endangered
White-rayed Pentachaeta Pentachaeta bellidiflora No critical habitat has been designated for this species. https://ecos.fws.gov/ecp/species/7782	Endangered

Critical habitats

Potential effects to critical habitat(s) in this location must be analyzed along with the endangered species themselves.

This location overlaps the critical habitat for the following species:

NAME	TYPE
Marbled Murrelet Brachyramphus marmoratus https://ecos.fws.gov/ecp/species/4467#crithab	Final
Northern Spotted Owl Strix occidentalis caurina https://ecos.fws.gov/ecp/species/1123#crithab	Final
Tidewater Goby Eucyclogobius newberryi https://ecos.fws.gov/ecp/species/57#crithab	Final

NOT FOR CONSULTATION

Migratory birds

Certain birds are protected under the Migratory Bird Treaty Act[1] and the Bald and Golden Eagle Protection Act[2].

Any person or organization who plans or conducts activities that may result in impacts to migratory birds, eagles, and their habitats should follow appropriate regulations and consider implementing appropriate conservation measures, as described below.

1. The Migratory Birds Treaty Act of 1918.
2. The Bald and Golden Eagle Protection Act of 1940.

Additional information can be found using the following links:

- Birds of Conservation Concern http://www.fws.gov/birds/management/managed-species/birds-of-conservation-concern.php
- Measures for avoiding and minimizing impacts to birds http://www.fws.gov/birds/management/project-assessment-tools-and-guidance/conservation-measures.php
- Nationwide conservation measures for birds http://www.fws.gov/migratorybirds/pdf/management/nationwidestandardconservationmeasures.pdf

MIGRATORY BIRD INFORMATION IS NOT AVAILABLE AT THIS TIME

Tell me more about conservation measures I can implement to avoid or minimize impacts to migratory birds.

Nationwide Conservation Measures describes measures that can help avoid and minimize impacts to all birds at any location year round. Implementation of these measures is particularly important when birds are most likely to occur in the project area. When birds may be breeding in the area, identifying the locations of any active nests and avoiding their destruction is a very helpful impact minimization measure. To see when birds are most likely to occur and be breeding in your project area, view the Probability of Presence Summary. Additional measures and/or permits may be advisable depending on the type of activity you are conducting and the type of infrastructure or bird species present on your project site.

What does IPaC use to generate the migratory birds potentially occurring in my specified location?

The Migratory Bird Resource List is comprised of USFWS Birds of Conservation Concern (BCC) and other species that may warrant special attention in your project location.

The migratory bird list generated for your project is derived from data provided by the Avian Knowledge Network (AKN). The AKN data is based on a growing collection of survey, banding, and citizen science datasets and is queried and filtered to return a list of those birds reported as occurring in the 10km grid cell(s) which your project intersects, and that have been identified as warranting special attention because they are a BCC species in that area, an eagle (Eagle Act requirements may apply), or a species that has a particular vulnerability to offshore activities or development.

Again, the Migratory Bird Resource list includes only a subset of birds that may occur in your project area. It is not representative of all birds that may occur in your project area. To get a list of all birds potentially present in your project area, please visit the AKN Phenology Tool.

What does IPaC use to generate the probability of presence graphs for the migratory birds potentially occurring in my specified location?

The probability of presence graphs associated with your migratory bird list are based on data provided by the Avian Knowledge Network (AKN). This data is derived from a growing collection of survey, banding, and citizen science datasets .

Probability of presence data is continuously being updated as new and better information becomes available. To learn more about how the probability of presence graphs are produced and how to interpret them, go the Probability of Presence Summary and then click on the "Tell me about these graphs" link.

How do I know if a bird is breeding, wintering, migrating or present year-round in my project area?

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To see what part of a particular bird's range your project area falls within (i.e. breeding, wintering, migrating or year-round), you may refer to the following resources: The Cornell Lab of Ornithology All About Birds Bird Guide, or (if you are unsuccessful in locating the bird of interest there), the Cornell Lab of Ornithology Neotropical Birds guide. If a bird on your migratory bird species list has a breeding season associated with it, if that bird does occur in your project area, there may be nests present at some point within the timeframe specified. If "Breeds elsewhere" is indicated, then the bird likely does not breed in your project area.

What are the levels of concern for migratory birds?

Migratory birds delivered through IPaC fall into the following distinct categories of concern:

1. "BCC Rangewide" birds are Birds of Conservation Concern (BCC) that are of concern throughout their range anywhere within the USA (including Hawaii, the Pacific Islands, Puerto Rico, and the Virgin Islands);
2. "BCC - BCR" birds are BCCs that are of concern only in particular Bird Conservation Regions (BCRs) in the continental USA; and
3. "Non-BCC - Vulnerable" birds are not BCC species in your project area, but appear on your list either because of the Eagle Act requirements (for eagles) or (for non-eagles) potential susceptibilities in offshore areas from certain types of development or activities (e.g. offshore energy development or longline fishing).

Although it is important to try to avoid and minimize impacts to all birds, efforts should be made, in particular, to avoid and minimize impacts to the birds on this list, especially eagles and BCC species of rangewide concern. For more information on conservation measures you can implement to help avoid and minimize migratory bird impacts and requirements for eagles, please see the FAQs for these topics.

Details about birds that are potentially affected by offshore projects

For additional details about the relative occurrence and abundance of both individual bird species and groups of bird species within your project area off the Atlantic Coast, please visit the Northeast Ocean Data Portal. The Portal also offers data and information about other taxa besides birds that may be helpful to you in your project review. Alternately, you may download the bird model results files underlying the portal maps through the NOAA NCCOS Integrative Statistical Modeling and Predictive Mapping of Marine Bird Distributions and Abundance on the Atlantic Outer Continental Shelf project webpage.

Bird tracking data can also provide additional details about occurrence and habitat use throughout the year, including migration. Models relying on survey data may not include this information. For additional information on marine bird tracking data, see the Diving Bird Study and the nanotag studies or contact Caleb Spiegel or Pam Loring.

What if I have eagles on my list?

If your project has the potential to disturb or kill eagles, you may need to obtain a permit to avoid violating the Eagle Act should such impacts occur.

Proper Interpretation and Use of Your Migratory Bird Report

The migratory bird list generated is not a list of all birds in your project area, only a subset of birds of priority concern. To learn more about how your list is generated, and see options for identifying what other birds may be in your project area, please see the FAQ “What does IPaC use to generate the migratory birds potentially occurring in my specified location”. Please be aware this report provides the “probability of presence” of birds within the 10 km grid cell(s) that overlap your project; not your exact project footprint. On the graphs provided, please also look carefully at the survey effort (indicated by the black vertical bar) and for the existence of the “no data” indicator (a red horizontal bar). A high survey effort is the key component. If the survey effort is high, then the probability of presence score can be viewed as more dependable. In contrast, a low survey effort bar or no data bar means a lack of data and, therefore, a lack of certainty about presence of the species. This list is not perfect; it is simply a starting point for identifying what birds of concern have the potential to be in your project area, when they might be there, and if they might be breeding (which means nests might be present). The list helps you know what to

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look for to confirm presence, and helps guide you in knowing when to implement conservation measures to avoid or minimize potential impacts from your project activities, should presence be confirmed. To learn more about conservation measures, visit the FAQ "Tell me about conservation measures I can implement to avoid or minimize impacts to migratory birds" at the bottom of your migratory bird trust resources page.

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Marine mammals

Marine mammals are protected under the Marine Mammal Protection Act. Some are also protected under the Endangered Species Act[1] and the Convention on International Trade in Endangered Species of Wild Fauna and Flora[2].

The responsibilities for the protection, conservation, and management of marine mammals are shared by the U.S. Fish and Wildlife Service [responsible for otters, walruses, polar bears, manatees, and dugongs] and NOAA Fisheries[3] [responsible for seals, sea lions, whales, dolphins, and porpoises]. Marine mammals under the responsibility of NOAA Fisheries are **not** shown on this list; for additional information on those species please visit the Marine Mammals page of the NOAA Fisheries website.

The Marine Mammal Protection Act prohibits the take (to harass, hunt, capture, kill, or attempt to harass, hunt, capture or kill) of marine mammals and further coordination may be necessary for project evaluation. Please contact the U.S. Fish and Wildlife Service Field Office shown.

1. The Endangered Species Act (ESA) of 1973.
2. The Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) is a treaty to ensure that international trade in plants and animals does not threaten their survival in the wild.
3. NOAA Fisheries, also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

The following marine mammals under the responsibility of the U.S. Fish and Wildlife Service are potentially affected by activities in this location:

NAME

Southern Sea Otter Enhydra lutris nereis
https://ecos.fws.gov/ecp/species/8560

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Facilities

National Wildlife Refuge lands

Any activity proposed on lands managed by the National Wildlife Refuge system must undergo a 'Compatibility Determination' conducted by the Refuge. Please contact the individual Refuges to discuss any questions or concerns.

THERE ARE NO REFUGE LANDS AT THIS LOCATION.

Fish hatcheries

THERE ARE NO FISH HATCHERIES AT THIS LOCATION.

Wetlands in the National Wetlands Inventory

Impacts to NWI wetlands and other aquatic habitats may be subject to regulation under Section 404 of the Clean Water Act, or other State/Federal statutes.

For more information please contact the Regulatory Program of the local U.S. Army Corps of Engineers District.

WETLAND INFORMATION IS NOT AVAILABLE AT THIS TIME

This can happen when the National Wetlands Inventory (NWI) map service is unavailable, or for very large projects that intersect many wetland areas. Try again, or visit the NWI map to view wetlands at this location.

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Data limitations

The Service's objective of mapping wetlands and deepwater habitats is to produce reconnaissance level information on the location, type and size of these resources. The maps are prepared from the analysis of high altitude imagery. Wetlands are identified based on vegetation, visible hydrology and geography. A margin of error is inherent in the use of imagery; thus, detailed on-the-ground inspection of any particular site may result in revision of the wetland boundaries or classification established through image analysis.

The accuracy of image interpretation depends on the quality of the imagery, the experience of the image analysts, the amount and quality of the collateral data and the amount of ground truth verification work conducted. Metadata should be consulted to determine the date of the source imagery used and any mapping problems.

Wetlands or other mapped features may have changed since the date of the imagery or field work. There may be occasional differences in polygon boundaries or classifications between the information depicted on the map and the actual conditions on site.

Data exclusions

Certain wetland habitats are excluded from the National mapping program because of the limitations of aerial imagery as the primary data source used to detect wetlands. These habitats include seagrasses or submerged aquatic vegetation that are found in the intertidal and subtidal zones of estuaries and nearshore coastal waters. Some deepwater reef communities (coral or tuberficid worm reefs) have also been excluded from the inventory. These habitats, because of their depth, go undetected by aerial imagery.

Data precautions

Federal, state, and local regulatory agencies with jurisdiction over wetlands may define and describe wetlands in a different manner than that used in this inventory. There is no attempt, in either the design or products of this inventory, to define the limits of proprietary jurisdiction of any Federal, state, or local government or to establish the geographical scope of the regulatory programs of government agencies. Persons intending to engage in activities involving modifications within or adjacent to wetland areas should seek the advice of appropriate federal,

state, or local agencies concerning specified agency regulatory programs and proprietary jurisdictions that may affect such activities.

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Attachment D-

Representative Photographs of the Study Area

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Photograph 1. Photograph looking north at the paved driveway and adjacent landscaped//ornamental land cover surrounding the parking lot in the central portion of the Study Area. Photograph taken on December 27, 2019.

Photograph 2. Photograph looking north from the existing paved parking lot of the landscaped/ ornamental land cover in the north eastern portion of the Study Area. Photograph taken on December 27, 2019.

Photograph 3. Photograph of the landscaped/ ornamental land cover in the eastern portion of the Study Area. This portion of the Study Area is dominated by non-native invasive vegetation including pampas grass, Bermuda grass, monterey pine, blue gum eucalyptus, and silver wattle acacia. Photograph taken on December 27, 2019.

Photograph 4. Photograph of the central portion of the Study Area. The existing church structure and adjacent paved parking lot can be seen in the background of the photograph. Photograph taken on December 27, 2019.

Photograph 5. Photograph of the landscaped/ ornamental land cover in the southern portion of the Study Area dominated by blackwood acacia. Photograph taken on December 27, 2019.

Photograph 6. Photograph of planted ornamental trees including monterey pine and monterey cypress surrounding the existing church structure in the western portion of the Study Area. Photograph taken on December 27, 2019.

APPENDIX D

CULTURAL RESOURCES INFORMATION

ARCHAEOLOGICAL AND TRIBAL MONITORING PLAN FOR THE DRAKE AVENUE APARTMENTS PROJECT 825 DRAKE AVENUE, MARIN CITY, MARIN COUNTY, CALIFORNIA

1.0 INTRODUCTION

EDS prepared the following Archaeological and Tribal Monitoring Plan (Monitoring Plan) for the proposed Drake Avenue Apartments Project (Project) within the 1.01-acre property (APN 0522-112-03) at 825 Drake Avenue, Marin City, Marin County, California (Project Area). The Monitoring Plan was prepared as part of the archaeological study completed to satisfy compliance with the National Environmental Policy Act (NEPA) and Section 106 of the National Historic Preservation Act (NHPA). The purpose of the Monitoring Plan is to allow for the identification, evaluation, treatment, and protection of significant archaeological resources, including archaeological resources having traditional religious and cultural importance to the Federated Indians of Graton Rancheria (FIGR), that may be unearthed during Project-related ground-disturbing activities. The Project will receive project-based vouchers from the County of Marin using federal funds provided by the United States (U.S.) Housing and Urban Development (HUD); therefore, the proposed Project is subject to the HUD environmental review procedures found in 24 CFR Part 58, which require compliance with the NEPA and Section 106 of the NHPA, and its implementing regulations found at 36 CFR Part 800. The Project is exempt from review under the California Environmental Quality Act (CEQA).

In March 2023, EDS Principal Archaeologist, Sally Evans, M.A, RPA (#29300590) completed an Archaeological Study of the 1.01-acre Project Area to identify archaeological historic properties within the Project Area in accordance with NEPA and Section 106 of the NHPA, and to provide Project-specific recommendations.[1] The Archaeological Study included a record search at the Northwest Information Center (NWIC; File No. 22-1235); a review of historical maps, aerial photographs, and other information to assess the potential/sensitivity for buried historic period archaeological resources; a review of environmental, geology, soils, and geoarchaeological information to assess the potential/sensitivity for buried prehistoric archaeological resources; a Native American Sacred Lands inventory; Tribal consultation; and a pedestrian field survey of the Project Area that included the excavation of seven hand auger borings to inspect the subsurface for archaeological resources.

The Archaeological Study did not result in the identification of any National Register listed or eligible archaeological resources within the Project Area; however, the potential to encounter subsurface historic period archaeological deposits was found to be high due to the presence of built environment resources within and adjacent to the Project Area as early as ca. 1912 and temporary housing associated with workers of Marinship between 1942 and ca. 1960. There also remains the potential for the Project Area to contain resources having traditional religious and cultural importance to FIGR.

[1] Evans, Sally (2023): Archaeological Study for the Proposed Drake Avenue Apartment Project, 825 Drake Avenue, Marin City, Marin County, California. Prepared by Evans & De Shazo, Inc., Sebastopol, California.

As such, to ensure the identification and appropriate treatment of unanticipated archaeological resources and Tribal resources that may be encountered, EDS recommended Cultural Resources Awareness Training and Archaeological and Tribal Monitoring during demolition and Project-related ground-disturbing activities. (See Archaeological Study report for further details).

The purpose of the Monitoring Plan herein is to outline the monitoring protocols and procedures to follow in the event that archaeological resources, including archaeological resources having traditional religious and cultural importance to FIGR, are unearthed during Project-related ground-disturbing activities. The Monitoring Plan includes procedures for communication, documentation, reporting, curation, a discovery plan, and a treatment plan for the discovery of human remains in accordance with state law and FIGR's required treatment.

2.0 ARCHAEOLOGICAL SENSITIVITY AND ANTICIPATED RESOURCE TYPES

The results of the Archaeological Study completed by EDS indicates that the Project Area is sensitive for archaeological resources. Based on the potential to encounter archaeological resources, the following monitoring recommendations are presented in this Monitoring Plan:

- Cultural Resource Awareness Training prior to commencement of ground-disturbing activities.
- Archaeological and Tribal monitoring.

Specific activities that have the potential to encounter archaeological resources include:

- Grubbing, grading, trenching for utilities, and building and retaining wall construction.

2.1 PREHISTORIC SENSITIVITY AND MONITORING

Based on the environmental setting, geology, soils, and geoarchaeological information, it appears that the Project Area has a low potential/sensitivity for buried prehistoric archaeological resources but a moderate potential for surficial prehistoric archaeological resources; and there remains the potential for the Project Area to contain resources having traditional religious and cultural importance to FIGR.

Table 1: Prehistoric Property Types

Property Types	Expected Characteristics
Residential, Midden Sites and Features	Midden soils (dark, friable, or greasy soil with cultural constituents), ash, shell, faunal bone, groundstone artifacts, fire-affected rock (FAR), baked clay, worked bone, house floors, cooking pits, and human remains.
Lithic Scatters	Flaked stone debitage, projectile points, groundstone artifacts, and flaked-stone tools.
Burial Sites	Deliberately interred burials, cremations, or human bone; beads and other artifacts may be interred with burials.
Isolates	Artifacts found without any association with other artifacts or features (e.g.,

Property Types	Expected Characteristics
	groundstone artifacts, flaked stone tools, FAR, baked clay, worked bone, and human remains).
Contact Sites	A contact site is an example of any of the above property types that was utilized by Native Americans after contact with European peoples. Native American artifacts and historic-period artifacts will be identified in the same context (i.e., dating to the Mission Period).

2.2 HISTORIC SENSITIVITY AND MONITORING

Based on historical maps, aerial photographs, and other information environmental, it appears that the Project Area has a high sensitivity for subsurface historic period archaeological deposits due to the presence of built environment resources within and adjacent to the Project Area as early as ca. 1912 and temporary housing associated with workers of Marinship between 1942 and ca. 1960.

Table 2: Historic Property Types

Property Types	Expected Characteristics
Domestic Refuse	Domestic refuse features/deposits (e.g., fragments of ceramics, glass, metal, wood, faunal, brick, concrete, coal, botanical remains, etc.)
Historic-Period Features	Discrete, stratified trash features/deposits, structural remnants, and possible features associated with open workspaces, yard spaces, and/or occupation of Marinship worker housing (e.g., stone/brick foundations; chimney remains; ceramics; buttons; insignia; bullets; tools; and fragments of ceramics, glass, metal, wood, faunal, brick, concrete, coal, botanical remains, etc.).

3.0 ARCHAEOLOGICAL MONITORING PLAN

This Monitoring Plan defines specific procedures to identify, evaluate, and treat archaeological discoveries and details the methodology and protocols employed during archaeological monitoring. Included are the monitoring protocols and procedures for addressing specific contingencies, such as the discovery of human remains, project personnel qualifications, data collection protocols, site safety considerations, and post-field actions.

3.1 MONITORING PERSONNEL

3.1.1 Principal Investigator

A Principal Investigator (PI) shall be assigned to the Project. The PI shall be a Registered Professional Archaeologist (RPA) who meets the Secretary of Interior professional qualification standards for Archaeology (36 CFR Part 61). The role of the PI will be to oversee the archaeological monitoring program and will ensure high standards for monitoring, communication, field sampling, and laboratory

analysis. The PI will conduct field visits, supervise project personnel, and review the daily monitoring records and prepare the archaeological monitoring summary report.

3.1.2 Archaeological Monitor

An Archaeological Monitor (AM) shall be assigned to the Project. The role of the AM will be to monitor Project-related ground-disturbing activities under the direction of the PI. The AM shall have a minimum of a B.A./B.S. in Anthropology or higher with completion of an accredited archaeological field school and have at least two years of full-time experience performing archaeological monitoring in the San Francisco Bay Area. Other qualified archaeologists may assist with the Project mitigation and monitoring if warranted by the discovery of potentially significant cultural resources.

The archaeological monitor shall have access to a full complement of supplies that include a GPS unit, hand trowel, pin flags, caution tape, shaker screen, shovel, cell phone with digital camera, maps, and all other supplies necessary to effectively complete the construction monitoring task. Hard hats, boots, high-visibility reflective vests, earplugs, gloves, and safety glasses will be part of the monitor's attire.

2.1.3 Tribal Monitor

A tribal representative from FIGR shall provide Tribal monitoring of ground-disturbing activities within the Project Area.

3.2 PRE-CONSTRUCTION MEETING

Prior to the start of construction, an on-site preconstruction meeting shall be held to discuss the contents of this Monitoring Plan and to ensure that all parties understand the regulatory requirements describes in this Monitoring Plan. It is critical that all parties understand what the methods and goals of archaeological and Native American monitoring are and the protocols for the discovery of archaeological materials and human remains during construction. The PI and a representative from FIGR shall be present for the meeting.

3.3 CULTURAL RESOURCES AWARENESS TRAINING

In accordance with EDS's recommendations, before construction begins and for the duration of all ground disturbing activities, all Project personnel shall be trained in the proper procedures to follow if cultural resources are discovered. Project supervisors, contractors, and equipment operators shall be familiarized with the archaeological sensitivity of the Project Area, the types of archaeological resources that could be encountered during Project-related ground-disturbing activities, and procedures to follow if subsurface archaeological resources are unearthed during construction. To accomplish this, a Secretary of Interior qualified archaeologist shall conduct one or more preconstruction Cultural Resource Awareness Trainings as needed to familiarize supervisors, contractors, and equipment operators with the potential to encounter archaeological resources, the types of archaeological material that could be encountered, and procedures to follow if archaeological deposits and/or artifacts are encountered during construction. Workers will be expected to sign an acknowledgement form indicating

that they have received the Cultural Resources Awareness Training and that they understand the protocols for the discovery of cultural resources.

3.4 MONITORING COMMUNICATION AND PROCEDURES

Archaeological and Tribal monitoring will be implemented to identify potentially significant archaeological and Tribal resources that may be buried within the Project Area. Monitoring is defined as the active observation of excavation activities that could cause substantial adverse changes to cultural resources within or adjacent to the Project Area.

3.4.1 Archaeological Monitoring

The AM will conduct monitoring during construction. This will entail monitoring of all ground disturbances within the Project Area, including demolition and within the sidewalks and streets located adjacent to the Project Area.

- If the PI and/or AM, in consultation with the FIGR tribal representative, determine that monitoring is no longer required in specific locations, an e-mail detailing the reasons for changing the approach to monitoring shall be provided to the Construction Supervisor for review and approval at least 24 hours prior to any change.
- The PI or AM shall consult weekly with the Construction Supervisor and FIGR to confirm area(s) where ground-disturbing activities will occur during each week until ground disturbance is completed. The Construction Supervisor shall notify the PI of any changes to the construction schedule.
- The Construction Supervisor shall notify the PI and FIGR of any significant cultural resource discoveries and/or anticipated project delays.
- The AM shall have the authority to temporarily stop construction to inspect trench spoils or to inspect the trench sidewalls.
- If there is more than one construction activity requiring monitoring, a second AM may be assigned, as needed.
- If cultural resources are identified during construction and the AM is not on site, employees shall halt all excavation work within 100 feet of the discovery and immediately contact the Construction Supervisor and the PI. The Construction Supervisor and the PI/AM, in consultation with FIGR, will determine where work can occur and when work within the area of the discovery can restart.

3.4.2 Tribal Monitoring

The Tribal monitor will conduct monitoring during construction. This will entail monitoring of all ground disturbances within the Project Area, including demolition and within the sidewalks and streets located adjacent to the Project Area.

- An FIGR tribal representative will be onsite during ground disturbing activities. Should he/she need to be away from the Project Area at any time, he/she may designate a representative to monitor for a period of time or rely on the AM to ensure close inspection of the construction activities.
- FIGR tribal representative will monitor alongside the AM or can choose to monitor in a separate location should Project activities occur in more than one place at one time.
- If there is more than one construction activity requiring monitoring, a second Native American monitor may be assigned, as needed.
- If a second Native American monitor is needed, the FIGR tribal representative can elect an AM to fulfill this role, as needed.
- The FIGR tribal representative shall have the authority to temporarily stop construction to inspect trench spoils or to inspect the trench sidewalls, as needed.

3.5 DISCOVERY OF CULTURAL RESOURCES

Only authorized personnel may handle cultural resources. Construction personnel are not authorized to touch or move cultural resources. The discovery protocols and procedures outlined below will be coordinated in consultation with FIGR:

1. TEMPORARILY STOP WORK: If any employee, contractor, or subcontractor has uncovered a cultural resource (including human remains) at any point in the project, all work within 100 feet of the discovery must stop.
2. Construction can resume outside of the 100-foot radius of the discovery once the area has been fenced off or marked in the field and the archaeological team and FIGR have agreed that construction can resume.
3. The Construction Supervisor shall coordinate with the PI/AM to assess the discovery in accordance with the provisions of AMP.
4. If the resource(s) is determined not archaeological, work may proceed with no further delay.
5. If the resource is determined to be archaeological, the PI is responsible for notifying the Construction Supervisor and the client.
6. If the resource is prehistoric, the PI or AM will coordinate and contact FIGR.
7. The halting or redirection of work shall remain in effect until PI, client, and FIGR have conferred and determined if data recovery or other mitigation is required. If so, then excavations shall continue to be suspended until any further data recovery and mitigation has been completed.

8. If the resource is determined to be not potentially significant then the AM will record the resource on Department of Parks and Recreation (DPR) 523 forms and make recommendations for avoiding or collecting and documenting the resources accordingly.

9. Work may proceed when the PI/AM has stated that construction can continue and when it is established that there are no potentially significant resources or Native American remains present.

10. If the discovery includes human remains, follow the procedures outlined below in Sections 3.5.1 and 3.8.

11. If the Project results in the identification of potentially significant archaeological deposits (i.e., artifacts, human remains, or features), then an evaluation of the site's potential for listing on the National Register of Historic Places (NRHP) shall be conducted upon consultation and approval by FIGR. The AM and FIGR shall continue to monitor construction activities while mitigation is performed. All necessary and required data recovery and other mitigation shall be completed as promptly as possible after the discovery of any previously unknown cultural resource unless all parties agree to additional time (see section 3.6.2).

3.5.1 Inadvertent Discovery of Human Remains

If the discovery is determined by the PI/AM to be human remains, the Construction Supervisor and the client will be notified immediately. The PI and/or the Construction Supervisor shall contact the Marin County Coroner (415-473-6043) immediately. The human remains will be secured immediately. The coroner will have two working days to inspect the remains after receiving notification. If the remains are determined to be Native American and not under the coroner's jurisdiction, then the coroner has 24 hours to notify the Native American Heritage Commission (NAHC). The NAHC will notify a Most Likely Descendant (MLD), who has 48 hours to make recommendations to the client or authorized representative. Work will be suspended within 100 feet of the human remains until the MLD's written recommendations are agreed upon and implemented.

In the case of inadvertent discoveries of human remains, FIGR has requested the reburial of the remains and their associated funerary objects will be in an area as close as possible to the location of discovery.

The human remains should not be subject to any future disturbances and the appropriate measures will be taken to record this information and keep it confidential. Reburial of human remains shall be accomplished in compliance with the California Public Resources Code Section 5097.98(a) and (b) and will be determined after consultation with FIGR, the PI/AM, and the client/Construction Supervisor. The exact location will be recorded in a manner to protect it and to notify future users of its location, in accordance with California Public Resources Code.

3.6 DOCUMENTATION OF ARCHAEOLOGICAL RESOURCES

Archaeological deposits discovered during construction will be assumed eligible for inclusion in the NRHP under Criterion D until a formal determination of eligibility is made except for those categories of

resources described in Section 3.1.1. Prehistoric and historic-period cultural materials discovered during the Project will be recorded as appropriate by a professional archaeologist on DPR 523 forms, using standard techniques. Site overviews, features, and artifacts will be photographed; stratigraphic profiles and soil/sediment descriptions will be prepared for subsurface exposures, as necessary. Discovery locations will be documented on site location maps with the use of Global Positioning System (GPS) capable of recording locations with sub-meter accuracy. In addition, the AM will adhere to the guidelines for the discovery of archaeological resources as described here.

Cultural features, horizons, and artifacts detected in subsurface or deeply buried sediments may require further evaluation using excavated test units. Units may be excavated in controlled fashion to expose features, collect samples from undisturbed contexts, or interpret complex stratigraphy. A test excavation unit or small trench might also be used to determine if an intact occupation surface is present. Test units will be used only when necessary to gather information on the nature, extent, and integrity of subsurface cultural deposits to evaluate the resource's significance. Excavations will be conducted using techniques for controlling provenience. Spatial information, depth of excavation levels, natural and cultural stratigraphy, presence or absence of cultural material, and depth to sterile soil, or bedrock will be recorded. Test excavation units will be recorded on unit-level forms, which include plan maps for each excavated level, and material type, number, and vertical provenience (depth below surface and stratum association where applicable) for all artifacts recovered from the level. A stratigraphic profile will be drawn for at least one wall of each test excavation unit. Sediments excavated for purposes of cultural resources investigation will be screened through 1/4-inch mesh, with the use of 1/8-inch mesh in select locations to obtain smaller site constituents (e.g., chronological markers such as shell beads). All prehistoric and historic-period artifacts collected from the surface and from probes and excavation units will be analyzed, catalogued, and temporarily curated at the archaeological consultant's laboratory.

3.6.1 NRHP Ineligible Resources Identified

If historic disturbed features/deposits and/or isolated historic-period materials are identified and are clearly fragmentary (once examined by the PI/AM), have no clear association, or exhibit no diagnostic attributes, they will be considered ineligible deposits for the purposes of making initial decisions in the field during construction. Disturbed deposits or isolates will be noted in the daily monitoring record. This assessment will be made by the PI or AM, and DPR 523 forms may be prepared as necessary for documentation purposes.

Disturbed midden deposits and prehistoric materials may require additional analysis due to the potential for the presence of Native American human remains to exist within disturbed contexts. Native American remains, even fragmentary, are of significance to the Native American community and shall be addressed and recovered in the manner set forth in this document.

3.6.2 NRHP Eligible Resources Identified

If archaeological materials are identified during monitoring within or adjacent to the Project Area that appear to be NRHP eligible, appear to have integrity, and are in danger of being compromised by the

project construction, it will be necessary to evaluate the resource for its potential eligibility for listing in the NRHP. If resources are found eligible, the client will coordinate with the PI, the SHPO, and FIGR regarding treatment of the resource. It will then be necessary to resolve potential adverse effects under the NHPA, which may require mitigation such as archaeological excavation/data recovery in accordance with the Secretary of Interior Standards for documentation, if necessary.

3.7 CURATION

The client will assume responsibility for any funding requirements related to the accessioning of archaeological materials and the data recovery report at a curation facility. Artifacts will be cataloged using protocols acceptable to the David A. Fredrickson Archaeological Collections Facility at Sonoma State University, which is the curation facility recommended for any archaeological discoveries that result from this Project. Another curation facility meeting the California Office of Historic Preservation's guidelines for the curation of archaeological collections may also be used.

3.8 DOCUMENTATION OF NATIVE AMERICAN HUMAN REMAINS

If human remains are encountered, the AM will implement procedures stated in Section 3.5.1. All work will be conducted in consultation with and in the presence of a FIGR representative and the MLD. The AM may illustrate or sketch the remains; however, no photographs or electronic documentation of the remains will be allowed. In addition, the archaeologist will record the location of the remains via GPS capable of recording locations with sub-meter accuracy and document their location on DPR 523 forms that will be submitted to FIGR, the MLD and to the NWIC. See Section 3.5.1 *Inadvertent Discovery of Human Remains* for reburial procedures.

3.9 PROCEEDING WITH CONSTRUCTION

Project construction outside the discovery location may continue while documentation and assessment of the cultural resource is underway. The PI/AM will determine the boundaries of the discovery location. In consultation with the client and FIGR, the PI/AM will determine the appropriate level of documentation and treatment of the resource and in accordance with this AMP. Construction may continue at the discovery location only after the process outlined in this plan is followed and that compliance with state and federal laws is complete.

3.10 REPORTING PROCEDURES

3.10.1 Daily Field Records

During archaeological monitoring, the AM will prepare a daily log for each day (daily monitoring record). The log will describe earth-moving activities, detail cultural resource discoveries, and other actions taken, including noncompliance issues. For issues concerning non-compliance with established procedures, the PI will notify the client within 24 hours (via telephone or email).

3.10.2 Final Report

Forty-five business days after the completion of monitoring an Archaeological Monitoring Report (AMR) will be produced by or under the direction of the PI. The report will be provided to the client and FIGR for review and comment. The final report will be submitted electronically to all parties involved in the Project and the NWIC.

March 1, 2023

Ms. Shannon Pries, HUD Liaison
Office of Historic Preservation
1725 23rd Street, Suite 100
Sacramento, CA 95816

Subject: Historic Review Clearance for Drake Avenue Apartments Project

Dear Ms. Pries,

The U.S. Department of Housing and Urban Development (HUD) is providing federal funding for the Drake Avenue Apartments Project (proposed project), located in Marin County, California, thereby making the project subject to environmental review under the National Environmental Policy Act (NEPA). Marin County is the Responsible Entity and HUD is the NEPA Lead Agency for the proposed project. Marin County, as the Responsible Entity, is working with Raney Planning & Management, Inc. to prepare a NEPA Environmental Assessment (EA) for the proposed project.

Project Undertaking and Area of Potential Effect

The project site is located at 825 Drake Avenue in the unincorporated community of Marin City in Marin County, California (see Attachment 1). The 1.01-acre site, identified by Assessor's Parcel Number (APN) 052-112-03, is currently developed with a triple-wide manufactured home and a small storage shed in the western portion of the site, as well as a paved driveway which is used by the apartment complex to the north. The remainder of the project site is undeveloped and populated by trees. Surrounding existing land uses include residential uses to the north, east, and west; and the George Rocky Graham Park, an apartment complex, a daycare center, the Marin County Fire Department Station, and the Marin County Sheriff's Department Station to the south, across Drake Avenue (see Attachment 2). The Marin County Countywide Plan designates the site as Multi Family 11-40 units per acre (MF 4.5), and the site is zoned Residential Multiple Planned 34 units per acre (RMP-34). It is noted that the indirect area of potential effect is located within a larger National Register of Historic Places (NRHP)-eligible district.

The proposed project would include the demolition of all existing on-site structures and subsequent development of a five-story, multi-family affordable housing building. A total of 74 residential units would be developed, consisting of 24 one-bedroom units, 42 two-bedroom units, and eight three-bedroom units. The proposed building would also include a community space, office, and laundry room. The residential units would be affordable for households earning 30 to 70 percent of the annual median income (AMI) for Marin County.

Identification of Historic Properties

To determine the potential for historic and/or tribal cultural resources to exist within the project area, an Archeological Study and Historic Resources Evaluation was prepared for the proposed project (see Attachment 3). As part of the Archeological Study and Historic Resources Evaluation, a records search of the California Historical Resources Information System (CHRIS) and the Native American

Heritage Commission (NAHC) Sacred Lands File was conducted for the project site and vicinity, as well as an archeological pedestrian survey and historic architectural survey.

The CHRIS records search included review of the archaeological base maps, site records, and survey reports on file at the Northwest Information Center at Sonoma State University. A cultural resource study that encompasses the project site had not been previously conducted, and known historical resources do not exist on the project site. The review of historical maps, aerial photographs, and other documents indicate that the project site remained undeveloped until the 1920s, when the site became part of a dairy ranch, which included several buildings and planted trees. By the mid-1940s, the site was developed with government housing, which was replaced by the Village Baptist Church building in 1968, which was subsequently destroyed by fire in 1999. The NAHC Sacred Lands File search for tribal cultural resources within the project area returned negative results, which indicates that known tribal cultural resources do not exist on the project site.

A review of the environmental setting, geology, and soils associated with the project site, as well as two previous geotechnical reports, indicate that the project site has a low potential/sensitivity for buried prehistoric archaeological resources. In addition, a 2017 geoarchaeological study designated the site as having a low potential/sensitivity for buried prehistoric archeological resources; however, the geoarchaeological study indicates that the project site has moderate potential to contain surficial archeological resources. A recent archeological pedestrian survey conducted for the project included six auger borings which were hand excavated from the project site to a depth of approximately 3.28 feet to inspect the site for archaeological resources. The pedestrian survey did not identify any on-site resources that qualify as protected by the NRHP. Overall, the potential to encounter buried archeological resources appears to be low due to the redevelopment of the project site in the 1940s and again in the 1960s.

Pursuant to Section 106 of the National Historic Preservation Act, on January 13, 2023, the County distributed project notification letters to the applicable Native American tribes identified by the NAHC. The Federated Indians of Graton Rancheria (FIGR) responded on January 25, 2023, with a request to consult and the project archaeologist has been in frequent communication with the FIGR since that time as part of the cultural resource site reconnaissance. A Tribal monitor was present at the archeological field work for the project. Tribal consultation is ongoing, and a monitoring plan will be developed in consultation with FIGR which takes into account the accidental discovery provisions defined in Section 22.20.40 of the Marin County Development Code. Other contacted tribes did not respond to the consu notification.

Due to the findings described above, the discovery of historic cultural resources or tribal cultural resources is not anticipated to occur during implementation of the proposed project. Nonetheless, the potential exists for unknown subsurface resources to be encountered during ground-disturbing activities associated with project construction. However, the project would be subject to State requirements, pursuant to Health and Safety Code Section 7050.5(c) and Public Resources Code Section 5097.98, in the event that any cultural resources are encountered on-site.

<u>County of Marin Finding</u>

Based on the findings of the Archeological Study and Historic Resources Evaluation, and because the project would be required to comply with State standards and the protective measures in the monitoring plan that will be included in the environmental assessment, the County has determined that ***historic properties would not be affected*** as a result of the proposed project. In compliance with Section 106 of the National Historic Preservation Act and its implementing regulations 36 CFR Part 800, we seek your concurrence in our finding.

I look forward to receiving your response. If you have any questions regarding the project, please contact me by email at TTaylor@marincounty.org or by phone at (415) 473-7873.

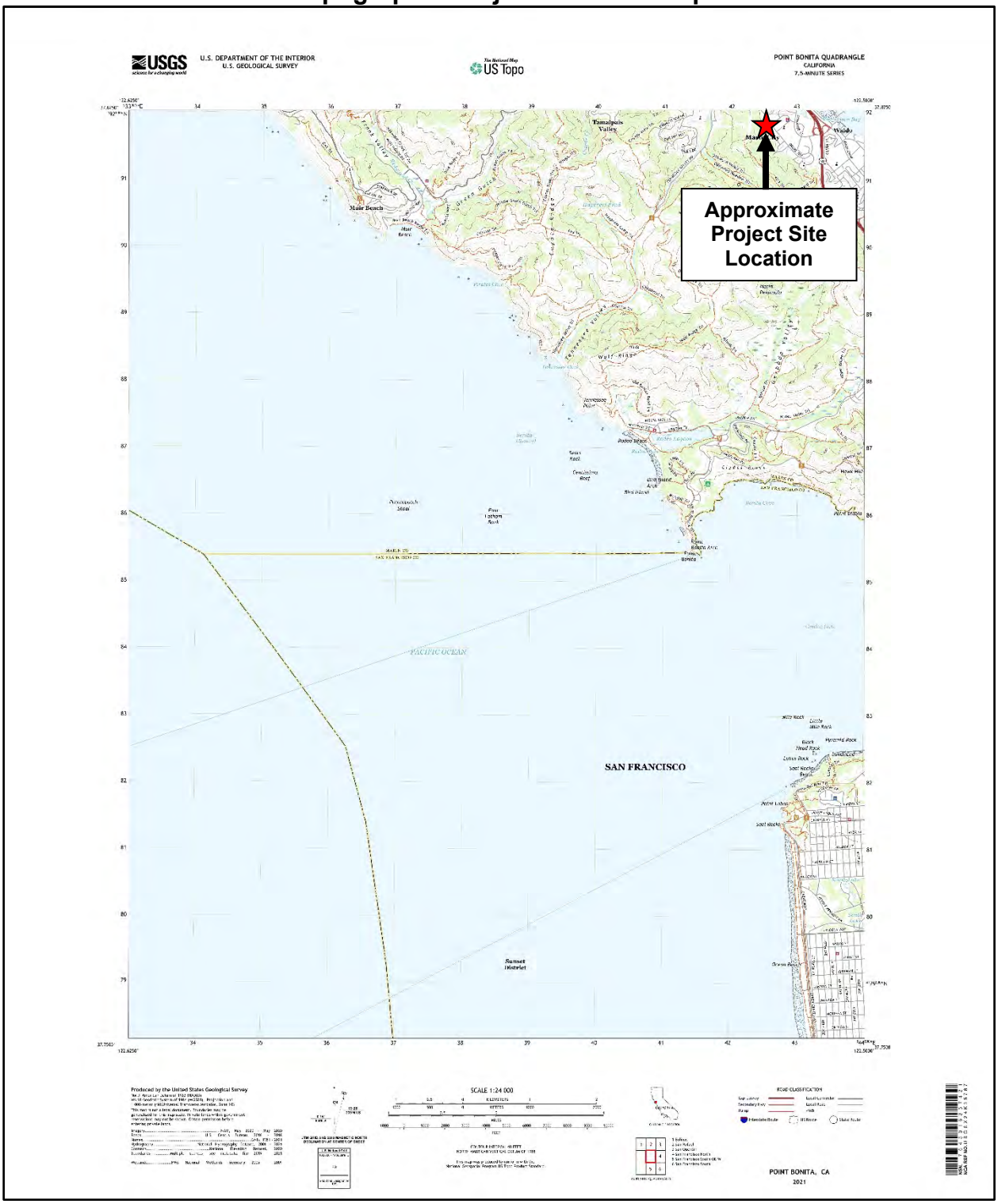
Sincerely,

Tammy Taylor, Senior Planner
Marin County Community Development Agency
3501 Civic Center Drive, Suite 308
San Rafael, CA 94903

Attachments:

1. Topographic Project Location Map
2. Project Vicinity Map
3. Archeological Study and Historic Resources Evaluation

Attachment 1
Topographic Project Location Map



Attachment 2
Project Vicinity Map

Project Site boundaries are approximate.

Attachment 3
Archeological Study and Historic Resources Evaluation

ARCHEOLOGICAL STUDY REMOVED DUE TO CONFIDENTIALITY

State of California • Natural Resources Agency
Gavin Newsom, *Governor*

DEPARTMENT OF PARKS AND RECREATION
OFFICE OF HISTORIC PRESERVATION
Armando Quintero, *Director*

Julianne Polanco, State Historic Preservation Officer
1725 23rd Street, Suite 100, Sacramento, CA 95816-7100
Telephone: (916) 445-7000 FAX: (916) 445-7053
calshpo.ohp@parks.ca.gov www.ohp.parks.ca.gov

March 9, 2023
[VIA EMAIL]

Refer to HUD_2023_0301_001

Ms. Tammy Taylor
Senior Planner
Community Development Agency
Housing & Federal Grants Division
County of Marin
3501 Civic Center Drive, Suite 308
San Rafael, CA 94903

Re: Drake Avenue Apartments Multifamily Affordable Housing Development Project at 825 Drake Avenue, Marin City, CA

Dear Ms. Taylor:

The California State Historic Preservation Office (SHPO) received the consultation submittal for the above referenced undertaking for our review and comment pursuant to Section 106 of the National Historic Preservation Act and its implementing regulations found at 36 CFR Part 800. The regulations and advisory materials are located at www.achp.gov.

The County of Marin is the Responsible Entity (RE) for the development of the Drake Avenue Apartments project, a multifamily affordable housing development project utilizing funding from the U.S. Department of Housing and Urban Development (HUD).

In an effort to identify potential historic properties within the undertaking area of potential effects (APE) the County and consultants, Evans & DeShazo, Inc. Archeology & Historic Preservation, obtained a records search for the project area from the California Historical Resources Information System (CHRIS), and requested a Sacred Lands File search from the Native American Heritage Commission (NAHC). The County has consulted with the Federated Indians of the Graton Rancheria and an archeological survey of the APE was completed. No historic properties identified within the APE. SHPO believes the City made reasonable and good faith efforts to identify historic properties within the APE.

Pursuant to 36 CFR Part 800.4(d)(1)(i) the SHPO does not object to the County of Marin's finding of *No historic properties affected* for the Drake Avenue Apartments multifamily affordable housing development project located at 825 Drake Avenue in Marin City, CA. The County may have additional Section 106 responsibilities under certain circumstances set for in 36 CFR Part 800. For example, in the event that historic properties are discovered during the

implementation of the undertaking, the County is required to consult further pursuant to 36 CFR Part 800.13(b).

We appreciate the County of Marin's consideration of historic properties in the project planning process. If you have questions please contact Shannon Lauchner Pries, Historian II, with the Local Government & Environmental Compliance Unit at shannon.pries@parks.ca.gov .

Note that we are only sending this letter in electronic format. Please confirm receipt of this letter. If you would like a hard copy mailed to you, respond to this email to request a hard copy be mailed.

Sincerely,

Julianne Polanco
State Historic Preservation Officer

APPENDIX E

STORMWATER CONTROL PLAN

KISTER, SAVIO & REI INC.
LAND SURVEYORS & CIVIL ENGINEERS

MATTHEW L. REI, PRES.
R.C.E. 39863 - L.S. 7115

PATRICK M. REI, V.P.
L.S. 8178

DONALD E. KISTER (1905-1969)
CHARLES J. SAVIO (1921-2006)
MICHAEL P. REI (Retired)

825 SAN PABLO AVENUE
PINOLE, CA 94564
PHONE (510) 222 - 4020
FAX (510) 222 - 3718
E-MAIL info@ksrinc.net

STORMWATER CONTROL PLAN (SWCP)

MARIN COUNTY

PROJECT NAME & OWNER

825 DRAKE AVENUE
MULTI FAMILY HOUSING

PROJECT LOCATION

825 DRAKE AVENUE
SAUSALITO, CA 94965
UNINCORPORATED MARIN COUNTY

PREPARED FOR

AMG & ASSOCIATES
PO BOX 260770

PREPARED BY

KISTER, SAVIO & REI, INC
825 SAN PABLO AVENUE
PINOLE, CA 94564

PREPARED: APRIL 2, 2020

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Table 1 – Project Data

Project Name/Number	825 Drake Avenue Multi Family Housing
Application Submittal Date	April, 2020
Project Location	825 Drake Avenue
Name of Developer	AMG & Associates
Project Phase No.	N/A
Project Type and Description	4 Story – 83 Unit Multi Family Housing Project
Project Watershed	San Francisco Bay
Total Project Site Area (acres)	1.01 Acres
Total Area of Land Disturbed (acres)	0.90 Acres
Total New Impervious Surface Area (sq. ft.)	22,768 sf
Total Replaced Impervious Surface Area	8,876 sf
Total Pre-Project Impervious Surface Area	8,876 sf
Total Post-Project Impervious Surface Area	31,644 sf
50% Rule	Applies
Project Density	83 Units per Acre
Applicable Special Project Categories	None
Percent LID and non-LID treatment	100% of stormwater runoff of impervious surfaces will be treated by on-site Bioswale Planters
HMP Compliance	Doesn't Apply – Less than one acre of impervious surface

II. SETTING

A. Project Location & Description

The Project Site is located at 825 Drake Avenue in unincorporated Marin County, at the northeast corner of Parker Circle and Drake Avenue. The subject parcel is bounded by the Village Oduduwa Housing Site to the north and the Ponderosa Estates Housing Site to the east. The area of the subject parcel, Assessor's Parcel Number 052-112-03, is 44,158 square feet, 1.02 acres, and is roughly rectangular in shape. The zoning for the subject parcel is RMP-34, Residential Multiple Planned. The Countywide Plan designation is MF4.5, Medium to High Density Residential. The proposed project is a 4 story, 83 unit, Multi-Family Housing Project, including a 24 car parking lot, accessed by a one-way driveway in on Parker Circle and a one-way driveway out onto Drake Avenue.

B. Existing Site Features and Description

The Project Site is a hilly, partially wooded site and currently houses a modular building and concrete parking lot. The topography of the Project Site slopes steeply from the north down to Drake Avenue, with the high point at the northwest corner of the site at elevation 87 (NAVD 88) and the low point at the southeast corner of the site at elevation 44 for an average slope of 12%.

There is an existing 12" underground storm drain, contained within an existing 10 foot storm drain easement, that traverses north-south across the eastern edge of the subject property. This existing 12" storm drain connects into an existing storm drain catch basin in Drake Avenue and will be utilized to collect the on-site storm drainage from the Project Site.

There are existing utilities in Drake Avenue that will be able to serve the existing Project Site.

A geotechnical investigation will be performed for the proposed project and will include a review of on-site soils, and design recommendations. The geotechnical investigation will likely reveal the site is underlain by clay and silt with variable amounts of organic material. This soil type has a very low infiltration rate.

Treatment of stormwater runoff from the Project Site is to be provided. The total post-project impervious surface area will be approximately 34,520 square feet. However, this project does not require stormwater management facilities that provide hydrograph modification benefits because the project will not be creating or replacing more than one acre of impervious surfacing. Instead, treatment of stormwater runoff from the Project Site will be provided. The locations of the eleven Vegetated Flow-Through Bioswales will be scattered throughout the Project Site. Underground storm drain pipes will collect the treated stormwater runoff from the project Vegetated Flow-Through Bioswales and convey the runoff to two existing publicly maintained catch basins in Drake Avenue.

Disposal of runoff to deep infiltration is not feasible on this site due to the low permeability of the clay soils.

III. LOW IMPACT DEVELOPMENT DESIGN STRATEGIES

A. Optimization of Site Layout

1. Limitation of development envelope. The Project Site is bounded on 2 sides by public streets; Sugar City Building Materials property on the east side and a narrow 20 foot wide EBMUD property to the north. A new 5,000 square foot building is proposed in the northern portion of the subject property, relatively far from San Pablo Avenue. Since the property owner is Landscaping company, landscaped areas will be incorporated into the site design and act as buffers between the proposed development and the property lines.

2. Preservation of natural drainage features. The Project Site does not have any natural drainage features to preserve. Currently, the Project Site features overland flow from the north (high) part of the subject property down to the south (low) part of the subject property along Drake Avenue. There are two existing publicly maintained catch basins along the Drake Avenue project frontage which will be utilized to collect the treated storm water runoff from the proposed project.

3. Setbacks from creeks, wetlands, and riparian habitats. There are no wetlands or riparian habitats on the subject parcel.

4. Minimization of Imperviousness. The proposed total impervious area (including roofs, concrete walkways and asphalt concrete paving) is 34,520 square feet or 78% of the 44,158 square feet of the subject parcel. The four story architectural design allows the project to maximize the number of residential units on the Project Site.

5. Use of drainage as a design element. The project design and grading set out to maximize the total area that receives stormwater treatment.

B. Use of Permeable Pavements

Due to the geotechnical and soil constraints listed above, permeable pavements will not be incorporated into the Project Site.

C. Dispersal of Runoff to Pervious Areas

No stormwater runoff from impervious areas will be directed to pervious areas of the Project Site.

D. Stormwater Control Measures

This project will seek to direct all but 275 square feet of the stormwater runoff from the building roofs, concrete walkways and asphalt concrete paving to the 11 IMP areas located throughout the Project Site.
.

IV. DOCUMENTATION OF DRAINAGE DESIGN

A. Descriptions of each Drainage Management Area

1. Table of Drainage Management Areas

DMA Name	*Surface Type*	*Area (square feet)*
DMA A1	*Asphalt Pavement*	*3,150*
DMA A2	*Concrete Pavement*	*690*
DMA A3	*Landscape*	*775*
DMA B1	*Roof*	*3,125*
DMA C1	*Roof*	*2,170*
DMA D1	*AC Pavement*	*4,810*
DMA D2	*Landscape*	*600*
DMA E1	*Roof*	*2,345*
DMA E2	*AC Pavement*	*3,380*
DMA E3	*Concrete Pavement*	*710*
DMA E4	*Landscape*	*245*
DMA F1	*Roof*	*1,740*
DMA G1	*Roof*	*1,720*
DMA H1	*Roof*	*1,085*
DMA H2	*AC Pavement*	*500*
DMA H3	*Concrete Pavement*	*285*
DMA H4	*Landscape*	*1,955*
DMA I1	*Roof*	*4,120*
DMA I2	*Concrete Pavement*	*115*
DMA J1	*Roof*	*1,740*
DMA K1	*Roof*	*1,990*
DMA K2	*Concrete Pavement*	*570*
DMA K3	*Landscape*	*610*
DMA X1	*AC/Concrete Pvmt.*	*275*
DMA X2	*Landscape*	*3,905*

2. Drainage Management Area Descriptions

DMA A1: Totaling 3,150 square feet. This area includes a portion of the asphalt concrete pavement in the north and east side of the Project Site. DMA A1 drains to IMP A - In-Ground Vegetated Flow-Through Bioswale.

DMA A2: Totaling 690 square feet. This area includes concrete pavement along the east side of the project building. This area slopes towards DMA A1 which is then directed to IMP A - In-Ground Vegetated Flow-Through Bioswale.

DMA A3: Totaling 775 square feet. This area includes a portion of the landscaping along the east side of the Project Site. This area slopes towards DMA A1 which is then directed to IMP A – In-Ground Vegetated Flow-Through Bioswale.

DMA B1: Totaling 3,125 square feet. This area includes a portion of the roof along the east side of the project building. DMA B1 drains to IMP B – In-Ground Vegetated Flow-Through Bioswale.

DMA C1: Totaling 2,170 square feet. This area includes a portion of the roof along the northeast side of the project building. DMA C1 drains to IMP C – In-Ground Vegetated Flow-Through Bioswale.

DMA D1: Totaling 4,810 square feet. This area includes a portion of the asphalt concrete pavement in the north side of the Project Site. DMA D1 drains to IMP D - In-Ground Vegetated Flow-Through Bioswale.

DMA D2: Totaling 600 square feet. This area includes a portion of the landscaping along the north side of the Project Site. This area slopes towards DMA D2 which is then directed to IMP D – In-Ground Vegetated Flow-Through Bioswale.

DMA E1: Totaling 2,345 square feet. This area includes a portion of the roof along the north side of the project building. DMA E1 drains to IMP E – In-Ground Vegetated Flow-Through Bioswale.

DMA E2: Totaling 3,380 square feet. This area includes a portion of the asphalt concrete pavement in the northwest side of the Project Site. DMA E2 drains to IMP E – In Ground Vegetated Flow-Through Bioswale.

DMA E3: Totaling 710 square feet. This area includes concrete pavement along the north side of the project building. This area slopes towards DMA E2 which is then directed to IMP E - In-Ground Vegetated Flow-Through Bioswale.

DMA E4: Totaling 245 square feet. This area includes a portion of the landscaping along the north side of the project building. This area slopes towards DMA E2 which is then directed to IMP E – In-Ground Vegetated Flow-Through Bioswale.

DMA F1: Totaling 1,740 square feet. This area includes a portion of the roof along the northwest side of the project building. DMA F1 drains to IMP F – Above-Ground Vegetated Flow-Through Bioswale.

DMA G1: Totaling 1,720 square feet. This area includes a portion of the roof along the northwest side of the project building. DMA G1 drains to IMP G – Above-Ground Vegetated Flow-Through Bioswale.

DMA H1: Totaling 1,085 square feet. This area includes a portion of the roof along the northwest side of the project building. DMA H1 drains to IMP H – In-Ground Vegetated Flow-Through Bioswale.

DMA H2: Totaling 500 square feet. This area includes a portion of the asphalt concrete pavement in the northwest side of the Project Site. DMA H2 drains to IMP H – In-Ground Vegetated Flow-Through Bioswale.

DMA H3: Totaling 285 square feet. This area includes concrete pavement along the northwest side of the project building. This area slopes towards DMA H4 which is then directed to IMP H - In-Ground Vegetated Flow-Through Bioswale.

DMA H4: Totaling 1,955 square feet. This area includes a portion of the landscaping along the northwest side of the Project Site. DMA H4 drains to IMP H – In-Ground

DMA I1: Totaling 4,120 square feet. This area includes a portion of the roof along the west side of the project building. DMA I1 drains to IMP I – Above-Ground Vegetated Flow-Through Bioswale.

DMA I2: Totaling 115 square feet. This area includes concrete pavement along the west side of the project building. DMA I2 drains to IMP I – Above-Ground Vegetated Flow-Through Bioswale.

DMA J1: Totaling 1,740 square feet. This area includes a portion of the roof along the south side of the project building. DMA J1 drains to IMP J – Above-Ground Vegetated Flow-Through Bioswale.

DMA K1: Totaling 1,990 square feet. This area includes a portion of the roof along the south side of the project building. DMA K1 drains to IMP K – Above-Ground Vegetated Flow-Through Bioswale.

DMA K2: Totaling 570 square feet. This area includes concrete pavement along the south side of the project building. DMA K2 drains to IMP K – In-Ground Vegetated Flow-Through Bioswale.

DMA K3: Totaling 610 square feet. This area includes a portion of the landscaping along the south side of the project building. DMA K3 drains to IMP K – In-Ground Vegetated Flow-Through Bioswale.

DMA X1: Totaling 275 square feet. This area includes a portion of the asphalt concrete pavement at the southeast driveway entrance. This area will not receive any stormwater treatment.

DMA X2: Totaling 3,905 square feet. This area includes landscaping mainly along Drake Avenue, but also includes miscellaneous landscaping throughout the Project Site. This area will not receive any stormwater treatment.

B. Integrated Management Practice Descriptions

Integrated Management Practice (IMP) facilities are proposed for the subject parcel; Above-Ground and In-Ground Vegetated Flow-Through Bioswales. The Bioswales will incorporate the following features:

- Surrounded by a concrete curb/wall.
- Each layer built flat, level, and to the elevations specified in the plans:
    - o Bottom of Gravel Layer (BGL)
    - o Top of Gravel Layer (TGL)
    - o Top of Soil Layer (TSL)
    - o Overflow Grate
    - o Facility Rim
- 12 inches (min.) Class 2 permeable, Caltrans specification 68-2.02F(3).
- 18 inches sand/compost mix meeting the specifications approved by the Regional Water Quality Control Board in April 2016.
- 4 in. dia. PVC SDR 35 perforated pipe underdrain, installed with the invert at the top of the Class 2 permeable layer with holes facing down, and connected to the overflow structure
- 6-inch-deep reservoir between top of soil elevation and overflow grate elevation
- Concrete drop inlet with frame overflow structure, with grate set to specified elevation, connected to new storm drain manhole at drainage ditch
- Plantings selected for water conservation
- Irrigation system with drip emitters and “smart” irrigation controllers

Information Summary for IMP Design

Total Project Area (Square feet)	44,158
Mean Annual Precipitation	33 inches
IMPs Designed For:	Treatment Only

Areas Draining to IMPs

DMA Name	*DMA Area (s.f.)*	*Post-project surface type*	*DMA Runoff factor*	*DMA Area × runoff factor*	*Soil Type:*	*IMP Name*				
					D	*IMP A*				
DMA A1	*3,150*	*Roof*	*1*	*3,150*						
DMA A2	*690*	*AC/Conc. Pavement*	*1*	*690*	*IMP Sizing factor*	*Rain Adjust-ment Factor*	*Minimum Area or Volume*	*Proposed Area or Volume*		
DMA A3	*775*	*Landscape*	*0.1*	*78*						
			Total	***3,918***	***0.04***	***1.00***	***157***	***168***		***IMP Area***

DMA Name	*DMA Area (s.f.)*	*Post-project surface type*	*DMA Runoff factor*	*DMA Area × runoff factor*	*Soil Type:*	*IMP Name*				
					D	*IMP B*				
DMA B1	*3,125*	*Roof*	*1*	*3,125*						
					IMP Sizing factor	*Rain Adjust-ment Factor*	*Minimum Area or Volume*	*Proposed Area or Volume*		
			Total	***3,125***	***0.04***	***1.00***	***125***	***144***		***IMP Area***

DMA Name	*DMA Area (s.f.)*	*Post-project surface type*	*DMA Runoff factor*	*DMA Area × runoff factor*	*Soil Type:*	*IMP Name*				
					D	*IMP C*				
DMA C1	*2,170*	*Roof*	*1*	*2,170*						
					IMP Sizing factor	*Rain Adjust-ment Factor*	*Minimum Area or Volume*	*Proposed Area or Volume*		
			Total	***2,170***	***0.04***	***1.00***	***87***	***92***		***IMP Area***

DMA Name	DMA Area (s.f.)	Post-project surface type	DMA Runoff factor	DMA Area × runoff factor	Soil Type:	IMP Name				
					D	IMP D				
DMA D1	4,810	AC/Conc. Pavement	1	4,810						
DMA D2	600	Landscape	1	60	IMP Sizing factor	Rain Adjust-ment Factor	Minimum Area or Volume	Proposed Area or Volume		
			Total	**4,870**	**0.04**	**1.00**	**195**	**195**	**IMP Area**	

DMA Name	DMA Area (s.f.)	Post-project surface type	DMA Runoff factor	DMA Area × runoff factor	Soil Type:	IMP Name			
					D	IMP E			
DMA E1	2,345	Roof	1	2,345					
DMA E2 & E3	4,090	AC/Conc. Pavement	1	4,090	IMP Sizing factor	Rain Adjust-ment Factor	Minimum Area or Volume	Proposed Area or Volume	
DMA E4	245	Landscape	0.1	25					
			Total	**6,460**	**0.04**	**1.00**	**258**	**270**	**IMP Area**

DMA Name	DMA Area (s.f.)	Post-project surface type	DMA Runoff factor	DMA Area × runoff factor	Soil Type:	IMP Name			
					D	IMP F			
DMA F1	1,740	Roof	1	1,740					
					IMP Sizing factor	Rain Adjust-ment Factor	Minimum Area or Volume	Proposed Area or Volume	
			Total	**1,740**	**0.04**	**1.00**	**70**	**85**	**IMP Area**

DMA Name	DMA Area (s.f.)	Post-project surface type	DMA Runoff factor	DMA Area × runoff factor	Soil Type:	IMP Name			
					D	IMP G			
DMA G1	3,150	Roof	1	1,720					
					IMP Sizing factor	Rain Adjust-ment Factor	Minimum Area or Volume	Proposed Area or Volume	
			Total	**1,720**	**0.04**	**1.00**	**69**	**89**	**IMP Area**

DMA Name	DMA Area (s.f.)	Post-project surface type	DMA Runoff factor	DMA Area × runoff factor	Soil Type:	IMP Name			
					D	IMP H			
DMA H1	1,085	Roof	1	1,085					
DMA H2 & H3	785	AC/Conc. Pavement	1	785	IMP Sizing factor	Rain Adjust-ment Factor	Minimum Area or Volume	Proposed Area or Volume	
DMA H4	1,955	Landscape	0.1	196					
			Total	**2,066**	**0.04**	**1.00**	**83**	**117**	**IMP Area**

DMA Name	DMA Area (s.f.)	Post-project surface type	DMA Runoff factor	DMA Area × runoff factor	Soil Type:	IMP Name			
					D	IMP I			
DMA I1	4,120	Roof	1	4,120					
DMA I2	115	AC/Conc. Pavement	1	115	IMP Sizing factor	Rain Adjust-ment Factor	Minimum Area or Volume	Proposed Area or Volume	
			Total	**4,235**	**0.04**	**1.00**	**169**	**176**	**IMP Area**

DMA Name	DMA Area (s.f.)	Post-project surface type	DMA Runoff factor	DMA Area × runoff factor	Soil Type:	IMP Name			
					D	IMP J			
DMA J1	1,740	AC/Conc. Pavement	1	1,740					
					IMP Sizing factor	Rain Adjust-ment Factor	Minimum Area or Volume	Proposed Area or Volume	
			Total	**1,740**	**0.04**	**1.00**	**70**	**85**	**IMP Area**

DMA Name	DMA Area (s.f.)	Post-project surface type	DMA Runoff factor	DMA Area × runoff factor	Soil Type:	IMP Name			
					D	IMP K			
DMA K1	1,990	Roof	1	1,990					
DMA K2	570	AC/Conc. Pavement	1	570	IMP Sizing factor	Rain Adjust-ment Factor	Minimum Area or Volume	Proposed Area or Volume	
DMA K3	610	Landscape	0.1	61					
			Total	**2,621**	**0.04**	**1.00**	**105**	**126**	**IMP Area**

DMA Name	*DMA Area (s.f.)*	*Post-project surface type*	*DMA Runoff factor*	*DMA Area × runoff factor*	*Soil Type:*	*IMP Name*
					D	*Self Treating*
DMA X1	*275*	*AC/Conc. Pavement*	*0*	*0*		
DMAXI2	*3,905*	*Landscape*	*0*	*0*		
			Total	***0***		

IMP Sizing factor	*Rain Adjust-ment Factor*	*Minimum Area or Volume*	*Proposed Area or Volume*	

V. SOURCE CONTROL MEASURES

A. Site Activities and potential sources of pollutants

The following activities planned for the project have potential to allow pollutants to enter runoff:

1) On-site drain inlets
2) Refuse disposal
3) Landscape maintenance
4) Fertilizers and pesticides used in landscaping area

To further reduce the potential to enter runoff, permanent and operational BMP's will be implemented as described in the following Table.

B. Source Control Table

Potential source of runoff pollutants	*Permanent source control BMPs*	*Operational source control BMPs*
On-site drain inlets	Inlets that could be accessed from paved areas, sidewalks and landscaped areas will be marked with a "No Dumping – Drains to Bay	• Inlet markings will be inspected annually and replaced or renewed as needed • Owners will receive stormwater pollution prevention information to be provided by the County • Bioretention and related structures and features will be inspected and maintained as specified in the BMP Operation and Maintenance Plan
Refuse areas	All dumpsters will be marked with a "Do not dump Hazardous Materials here" or similar	• Adequate litter receptacles will be provided throughout the project site • Groundskeeping crew or contractor will inspect and clean up daily. Spills will be cleaned up using dry methods

Landscaping/outdoor pesticide use	• Landscaping will be designed to minimize required irrigation and runoff, to promote surface infiltration, and to minimize the use of fertilizers and pesticides that can contribute to storm water pollution • Plants will be selected appropriate to site soils, slopes, climate, sun, wind, rain, land use, air movement, ecological consistency, and plant management • Plantings for swales will be selected to be appropriate to anticipated soil and moisture conditions	• All site landscaping is to be maintained by a professional landscaping contractor. Contract to state that landscaping is to be maintained using IPM principles, with minimal or no use of pesticides • Owners will receive integrated pest management information

C. Features, Materials, and Methods of Construction of Source Control BMP's

VI. STORM WATER FACILITY MAINTENANCE

A. Ownership and Responsibility for Maintenance in Perpetuity

All stormwater treatment facilities in this plan will be owned and maintained in perpetuity by the private owner of the subject property. The applicant accepts responsibility for interim operation and maintenance of the facilities until such time as this responsibility is formally transferred to the owner.

The property owner is required to provide a Stormwater Control Operation and Maintenance (O&M) Plan for review of the City of Pinole, and record an Operation and Maintenance Agreement, including and necessary rights-of-way, prior to issuance of a building permit. Additionally, the property owner will be required to annex into any financing mechanisms formed to insure that all costs associated with the perpetual Operation & Maintenance, administration and reporting of these water quality features (including costs associated with all required City of Pinole administration and reporting) are paid for by the property owner.

B. Summary of Maintenance Requirements for each Stormwater Facility

Bioretention and related facilities remove pollutants primarily by filtering runoff slowly through an active layer of soil. Routine maintenance is needed to insure that flow is unobstructed, that erosion is prevented, and that soils are held together by plant roots and are biologically active. Typical routine maintenance consists of the following:

1) Inspect inlets, exposure of soils, or other evidence of erosion. Clear any obstructions and remove any accumulations of sediment. Examine rock or other material used as a splash pad and replenish if necessary.

2) Inspect outlets for erosion or plugging.

3) Examine the vegetation to insure that it is healthy and dense enough to provide filtering and to protect soils from erosion. Replenish mulch as necessary, remove fallen leaves and debris, prune large shrubs or trees, and mow turf areas. Confirm that irrigation is adequate and not excessive. Replace dead plants and remove invasive vegetation.

4) Observe soil at the bottom of the bioretention planter or filter for uniform percolation throughout. If portions of the swale or filter do not drain within 48 hours after the end of the storm, the soil should be tilled and replanted. Remove any debris or accumulations of sediment.

5) Abate any potential vectors by filling in the ground and around swale and by insuring that there are no areas where water stands longer than 48 hours following a storm. If mosquito larvae are present and persistent contact the County Vector Control District for information and advice. Mosquito larvicides should be applied only when absolutely necessary and then only by a licensed individual or contractor.

VII. CONSTRUCTION PLAN C.3 CHECKLIST

STORMWATER CONTROL PLAN REFERENCE	BMP DESCRIPTION	PLAN SHEET NUMBER
CCCo IMP Summary Report Bioretention Detail & Exhibit	Vegetated Flow-Through Planter Bioswale Detail	Civil Sheet C1.1
Source Control Table V.B.	On-site drain inlets to be marked With “no dumping” message	Stormwater Control Plan
Source Control Table V.B.	Plant selection to minimize irrigation, minimize use of fertilizers and pesticides, and for pest resistance.	Landscape Plans
Source Control Table V.B.	Adequate litter receptacles throughout project area	Architectural Plans

VIII. OWNER’S CERTIFICATION

The selection, sizing, and preliminary design of stormwater treatment and other control measures in this plan meet the requirements of Regional Water Quality Control Board Order R2-2015-0049.

APPENDIX A

Project Name: 825 Drake Avenue
Project Type: Treatment Only
APN: 052-112-03
Drainage Area: 44,158
Mean Annual Precipitation: 33.0

Self-Treating DMAs

DMA Name	Area (sq ft)
DMA X1	275.0
DMA X2	3,905.0

IV. Areas Draining to IMPs

IMP Name: IMP A
IMP Type: Flow-Through Planter
Soil Group: IMP A

DMA Name	Area (sq ft)	Post Project Surface Type	DMA Runoff Factor	DMA Area x Runoff Factor
DMA A1	3,150	Conventional Roof	1.00	3,150
DMA A2	690	Concrete or Asphalt	1.00	690
DMA A3	775	Landscape	0.10	78
			Total	3,918
			Area	

IMP Sizing

IMP Sizing Factor	Rain Adjustment Factor	Minimum Area or Volume	Proposed Area or Volume
0.040	1.000	157	168

IMP Name: IMP B
IMP Type: Flow-Through Planter
Soil Group: IMP B

DMA Name	Area (sq ft)	Post Project Surface Type	DMA Runoff Factor	DMA Area x Runoff Factor
DMA B1	3,125	Conventional Roof	1.00	3,125
			Total	3,125
			Area	

IMP Sizing

IMP Sizing Factor	Rain Adjustment Factor	Minimum Area or Volume	Proposed Area or Volume
0.040	1.000	125	144

IMP Name: IMP C
IMP Type: Flow-Through Planter
Soil Group: IMP C

DMA Name	Area (sq ft)	Post Project Surface Type	DMA Runoff Factor	DMA Area x Runoff Factor
DMA C1	2,170	Conventional Roof	1.00	2,170

IMP Sizing

IMP Sizing	Rain	Minimum	Proposed

Total	2,170	**Factor**	**Adjustment Factor**	**Area or Volume**	**Area or Volume**
Area		0.040	1.000	87	92

IMP Name: IMP D
IMP Type: Flow-Through Planter
Soil Group: IMP D

DMA Name	Area (sq ft)	Post Project Surface Type	DMA Runoff Factor	DMA Area x Runoff Factor
DMA D1	4,810	Concrete or Asphalt	1.00	4,810
DMA D2	600	Landscape	0.10	60
Total				4,870

IMP Sizing

IMP Sizing Factor	Rain Adjustment Factor	Minimum Area or Volume	Proposed Area or Volume
Area	0.040	1.000	195	195

IMP Name: IMP E
IMP Type: Flow-Through Planter
Soil Group: IMP E

DMA Name	Area (sq ft)	Post Project Surface Type	DMA Runoff Factor	DMA Area x Runoff Factor
DMA E1	2,345	Conventional Roof	1.00	2,345
DMA E2	3,380	Concrete or Asphalt	1.00	3,380
DMA E3	710	Concrete or Asphalt	1.00	710
DMA E4	245	Landscape	0.10	25
Total				6,460

IMP Sizing

IMP Sizing Factor	Rain Adjustment Factor	Minimum Area or Volume	Proposed Area or Volume
Area	0.040	1.000	258	270

IMP Name: IMP F
IMP Type: Flow-Through Planter
Soil Group: IMP F

DMA Name	Area (sq ft)	Post Project Surface Type	DMA Runoff Factor	DMA Area x Runoff Factor
DMA F1	1,740	Conventional Roof	1.00	1,740
Total				1,740

IMP Sizing

IMP Sizing Factor	Rain Adjustment Factor	Minimum Area or Volume	Proposed Area or Volume
Area	0.040	1.000	70	85

IMP Name: IMP G
IMP Type: Flow-Through Planter
Soil Group: IMP G

DMA Name	Area (sq ft)	Post Project Surface Type	DMA Runoff Factor	DMA Area x Runoff Factor

IMP Sizing

DMA G1	1,720	Conventional Roof	1.00	1,720
			Total	1,720
			Area	

IMP Sizing Factor	Rain Adjustment Factor	Minimum Area or Volume	Proposed Area or Volume
0.040	1.000	69	89

IMP Name: IMP H
IMP Type: Flow-Through Planter
Soil Group: IMP H

DMA Name	Area (sq ft)	Post Project Surface Type	DMA Runoff Factor	DMA Area x Runoff Factor
DMA H1	1,085	Conventional Roof	1.00	1,085
DMA H2	500	Concrete or Asphalt	1.00	500
DMA H3	285	Concrete or Asphalt	1.00	285
DMA H4	1,955	Landscape	0.10	196
			Total	2,066
			Area	

IMP Sizing

IMP Sizing Factor	Rain Adjustment Factor	Minimum Area or Volume	Proposed Area or Volume
0.040	1.000	83	117

IMP Name: IMP I
IMP Type: Flow-Through Planter
Soil Group: IMP I

DMA Name	Area (sq ft)	Post Project Surface Type	DMA Runoff Factor	DMA Area x Runoff Factor
DMA I1	4,120	Conventional Roof	1.00	4,120
DMA I2	115	Concrete or Asphalt	1.00	115
			Total	4,235
			Area	

IMP Sizing

IMP Sizing Factor	Rain Adjustment Factor	Minimum Area or Volume	Proposed Area or Volume
0.040	1.000	169	176

IMP Name: IMP J
IMP Type: Flow-Through Planter
Soil Group: IMP J

DMA Name	Area (sq ft)	Post Project Surface Type	DMA Runoff Factor	DMA Area x Runoff Factor
DMA J1	1,740	Concrete or Asphalt	1.00	1,740
			Total	1,740
			Area	

IMP Sizing

IMP Sizing Factor	Rain Adjustment Factor	Minimum Area or Volume	Proposed Area or Volume
0.040	1.000	70	85

IMP Name: IMP K
IMP Type: Flow-Through Planter
Soil Group: IMP K

DMA Name	Area (sq ft)	Post Project Surface Type	DMA Runoff Factor	DMA Area x Runoff Factor
DMA K1	1,990	Conventional Roof	1.00	1,990
DMA K2	570	Concrete or Asphalt	1.00	570
DMA K3	610	Landscape	0.10	61
			Total	2,621

IMP Sizing			
IMP Sizing Factor	**Rain Adjustment Factor**	**Minimum Area or Volume**	**Proposed Area or Volume**
0.040	1.000	105	126
		Area	

Report generated on 4/1/2020 12:00:00 AM by the Contra Costa Clean Water Program IMP Sizing Tool software (version 1.3.1.0).

APPENDIX F

GEOTECHNICAL ENGINEERING INVESTIGATION

GEOTECHNICAL ENGINEERING INVESTIGATION
PROPOSED 825 DRAKE AVENUE PROJECT - MULTI-FAMILY DEVELOPMENT
825 DRAKE AVENUE
MARIN CITY, CALIFORNIA

KA PROJECT NO. 042-20043
OCTOBER 30, 2020

Prepared for:

MS. KIMBERLY CALICA
AMG & ASSOCIATES, LLC
P.O. BOX 260770
ENCINO, CALIFORNIA 91426

Prepared by:

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Krazan & ASSOCIATES, INC.

GEOTECHNICAL ENGINEERING • ENVIRONMENTAL ENGINEERING
CONSTRUCTION TESTING & INSPECTION

October 30, 2020

KA Project No. 042-20043

Ms. Kimberly Calica
AMG & Associates, LLC
P.O. Box 260770
Encino, California 91426

RE: Geotechnical Engineering Investigation
Proposed 825 Drake Avenue Project - Multi-Family Development
825 Drake Avenue
Novato, Marin County, California

Dear Ms. Calica:

In accordance with your request, we have completed a Geotechnical Engineering Investigation for the above-referenced site. The results of our investigation are presented in the attached report.

If you have any questions, or if we may be of further assistance, please do not hesitate to contact our office at (925) 307-1160.

Respectfully submitted,
KRAZAN & ASSOCIATES, INC.

David R. Jarosz, II
Managing Engineer
RGE No. 2698/RCE No. 60185

DRJ:ht

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October 30, 2020 KA Project No. 042-20043

GEOTECHNICAL ENGINEERING INVESTIGATION
PROPOSED 825 DRAKE AVENUE PROJECT - MULTI-FAMILY DEVELOPMENT
825 DRAKE AVENUE
MARIN CITY, CALIFORNIA

INTRODUCTION

This report presents the results of our Geotechnical Engineering Investigation for the proposed Drake Avenue Project to be located at 825 Drake Avenue in Marin City, California. Herzog Geotechnical Consulting Engineers prepared a Geotechnical Feasibility Evaluation for the site dated October 30, 2015. Information from that report has been reviewed. Discussions regarding site conditions are presented herein, together with conclusions and recommendations pertaining to site preparation, Engineered Fill, utility trench backfill, drainage and landscaping, foundations, concrete floor slabs and exterior flatwork, retaining walls, pavement design and soil cement reactivity.

A site plan showing the approximate boring locations is presented following the text of this report. A description of the field investigation, boring logs, and the boring log legend are presented in Appendix A. Appendix A also contains a description of the laboratory testing phase of this study, along with the laboratory test results. Appendices B and C contain guides to earthwork and pavement specifications. When conflicts in the text of the report occur with the general specifications in the appendices, the recommendations in the text of the report have precedence.

PURPOSE AND SCOPE

This investigation was conducted to evaluate the soil and groundwater conditions at the site, to make geotechnical engineering recommendations for use in design of specific construction elements, and to provide criteria for site preparation and Engineered Fill construction.

Our scope of services was outlined in our proposal dated August 19, 2020 (KA Proposal No. P567-20) included the following:

- A site reconnaissance by a member of our engineering staff to evaluate the surface conditions at the project site.
- A field investigation consisting of drilling 3 borings to depths ranging from approximately 15 to 20 feet for evaluation of the subsurface conditions at the project site.
- Performing laboratory tests on representative soil samples obtained from the borings to evaluate the physical and index properties of the subsurface soils.

- Evaluation of the data obtained from the investigation and an engineering analysis to provide recommendations for use in the project design and preparation of construction specifications.

- Preparation of this report summarizing the results, conclusions, recommendations, and findings of our investigation.

PROPOSED CONSTRUCTION

We understand that design of the proposed development is currently underway; structural load information and other final details pertaining to the structures are unavailable. On a preliminary basis, it is understood that the proposed development will include the construction of a new multi-family development. It is anticipated the building will be a four to five-story structure to be supported on a conventional foundations and concrete slab-on-grade. Foundation loads are anticipated to be light to moderate. On-site paved areas and landscaping are also planned for the development of the project.

In the event, these structural or grading details are inconsistent with the final design criteria, the Soils Engineer should be notified so that we may update this writing as applicable.

SITE LOCATION AND SITE DESCRIPTION

The site is irregular in shape and encompasses approximately 1.01 acres. The site is located at the northeast corner of Drake Avenue and Park Circle in Marin City, California. The site is identified by Assessor's Parcel No. (APN) 052-112-03. The site is predominately surrounded by residential developments and a community park.

Site history was obtained by reviewing aerial photographs taken in 1946, 1956, 1968, 1982, 1987, 1993, 2003, 2008, 2013, and 2019. Review of the 1946 and 1956 aerial photographs indicate that the project site was occupied by government housing buildings and trees. Park Circle and Drake Avenue bordered the site to the west and south, respectively. The site was surrounded by government housing and a grove of trees.

Review of the 1968 and 1982 aerial photographs indicate that the government housing buildings located at the project site had been removed. A new building was located in the eastern region of the site. Trees were located around the perimeter of the site. Most of the government housing buildings on the surrounding land had been removed and replaced with residential houses.

Review of the 1987 and 1993 aerial photographs indicate that the project site conditions appeared to be relatively similar to those noted in the 1982 aerial photograph. A residential development was built on the land north of the project site.

Review of the 2003 aerial photograph indicates that the building in the eastern region of the site had been removed. A parking lot was located in the central region of the site.

Review of the 2008 through 2019 aerial photographs indicate a building was located in the southwest corner of the site. Trees were located in the eastern, western, and southern regions of the site.

Presently, the site is occupied by a modular building in the southwest corner and a paved parking lot in the central region of the site. Buried irrigation and utility lines may be located within and around the site. The project site is bordered by a housing complex to the north, a walkway and undeveloped land to the east, Drake Avenue and a community park to the south, and Park Circle and a residential development to the west. Overhead electric lines are located along the southern boundary of the site. Drake Avenue and Park Circle are paved with a concrete curb and sidewalk. Trees are present near the western, southern, and eastern boundaries. The site is located on sloping terrain and generally slopes from the north to south.

GEOLOGIC SETTING

The project area is located on the margin of San Pablo Bay in the Northern Coast Ranges Physiographic Region. The area is characterized by hills to the west that slope eastward down the Bay. The area is underlain by ancient sedimentary and metamorphic rocks covered by modern stream and bay deposits.

Basic bedrock units in this area include metamorphic schists and phyllites and sheared sandstone and chert of the Franciscan Formation; serpentinite; beds of Cretaceous marine sandstone and shale; the Novato Conglomerate; and some Tertiary volcanic rocks. Thick deposits of alluvium and colluvium (i.e., slope deposits) overlie bedrock in buried valleys. Bay muds, formed from silts and clays brought south by the Sacramento River and deposited by tide waters of San Pablo Bay, overlie alluvium in low-lying areas fringing San Pablo Bay. Artificial fill has been placed on top of the bay muds in many areas.

Published maps by the California Geological Survey, (Rice and others, 2002) indicate that the site is not underlain by artificial fill placed over Bay muds. Bay muds are thick deposits of unconsolidated, low density, semi-fluid, highly compressible, and highly impermeable silty clays. These muds developed at or below mean sea level informer marshlands and mudflats fringing San Pablo and San Francisco Bays. Bay muds are rich in disseminated peaty (partially decayed organic) material, and are likely to contain lenses of sand in places.

Bay muds are plastic (deformable) and swell when wet, but shrink and become hard when dry. Sometimes the upper few feet of these deposits form a dry, somewhat firm crust over soft, saturated muds below. These muds contain about ⅔ water or air in void spaces, creating a "jelly-like" matrix that gives the muds their low strength and inability to support appreciable loads (Lee and Prasker, 1969). However, at depth the mud may become densified by compression of the overlying material.

Marin County is a region of high seismic activity. Major faults showing evidence of earthquake activity within historic time (past 200 years) in relation to the sites include the Hayward-Rodgers Creek (5.8 miles northeast), San Andreas (12 miles west), West Napa (17 miles east), Point Reyes (15 miles west) San Gregorio (24 miles southwest), Faults. These faults are considered active, as they have demonstrated geologic displacement within the past 10,000 years. Many smaller, potentially active faults of Quaternary age (two million years ago to the present) occur within 20 miles of the site, particularly the Burdell Mountain Fault Zone 2 miles to the northeast (Wagner and Bortugno, 1982). The Burdell Mountain Fault Zone is made up of a series of parallel and intersecting fractures that may extend beneath the muds of the Bay plain (Rice, 1975). The suggested alignments of a few minor earthquakes over a 40-year period suggest that this fault zone may be active.

The Alquist-Priolo Geologic Hazards Zones Act went into effect in March, 1973. Since that time, the act has been amended 11 times (Hart, 2007). The purpose of the Act, as provided in CGS Special Publication 42 (SP 42), is to prohibit the location of most structures for human occupancy across the traces of active faults and to mitigate thereby the hazard of fault-rupture." The act was renamed the Alquist-Priolo Earthquake Fault Zoning Act in 1994, and at that time, the originally designated "Special Studies Zones" was renamed the "Earthquake Fault Zones."

The area of the subject site is not included on an Earthquake Fault Zones Map. The site is not within a Fault-Rupture Hazard Zone. The nearest zoned faults are a portion of the Hayward-Rodgers Creek fault located more than 5 miles northeast of the subject site.

In 1990, the California State Legislature passed the Seismic Hazard Mapping Act to protect public safety from the effects of strong shaking, liquefaction, landslides, or other ground failure, and other hazards caused by earthquakes. The Act requires that the State Geologist delineate various seismic hazards zones on Seismic Hazards Zones Maps. Specifically, the maps identify areas where soil liquefaction and earthquake-induced landslides are most likely to occur. A site-specific geotechnical evaluation is required prior to permitting most urban developments within the mapped zones. The Act also requires sellers of real property within the zones to disclose this fact to potential buyers. The area of the subject site is not included on any of the State designated Seismic Hazard Zone Maps as of this report date.

FIELD AND LABORATORY INVESTIGATIONS

Subsurface soil conditions were explored by drilling 3 borings to depths ranging from approximately 15 to 20 feet below existing site grade, using a truck-mounted drill rig. In addition, 1 bulk subgrade sample was obtained from the site for laboratory R-value testing. The approximate boring and bulk sample locations are shown on the site plan. During drilling operations, penetration tests were performed at regular intervals to evaluate the soil consistency and to obtain information regarding the engineering properties of the subsoils. Soil samples were retained for laboratory testing. The soils encountered were continuously examined and visually classified in accordance with the Unified Soil Classification System. A more detailed description of the field investigation is presented in Appendix A.

Laboratory tests were performed on selected soil samples to evaluate their physical characteristics and engineering properties. The laboratory testing program was formulated with emphasis on the evaluation of natural moisture, density, gradation, shear strength, consolidation potential, expansion potential, R-value, and moisture-density relationships of the materials encountered. In addition, chemical tests were performed to evaluate the soil-cement reactivity. Details of the laboratory test program and results of the laboratory tests are summarized in Appendix A. This information, along with the field observations, was used to prepare the final boring logs in Appendix A.

SOIL PROFILE AND SUBSURFACE CONDITIONS

Based on our findings, the subsurface conditions encountered appear typical of those found in the geologic region of the site. In the area of Boring No. B2, the site was covered by approximately 4 inches of asphaltic concrete underlain by approximately 5 inches of concrete and 7 inches of aggregate base. Other portions of the site were covered with approximately 2 inches of gravel. In areas not

covered by pavement, the upper soils consisted of approximately 6 to 12 inches of very loose silty sandy clay and clayey sandy silt. These soils are disturbed, have low strength characteristics and are highly compressible when saturated.

We did not encounter what appeared to be fill material within our borings. However, review of the Geotechnical Feasibility Evaluation prepared by Herzog Geotechnical Consulting Engineers indicates approximately 1 to 6 feet of fill material was encountered in their borings. The fill predominately consisted of sandy clay, gravelly sandy clay, sandy silt, gravelly silt, sandy gravel and silty gravel. These soils were occasionally intermixed with debris including wood and concrete. Testing performed on these soils indicated the fill material ranged from loosely placed to compacted.

Beneath the pavement section, loose surface soils and fill material, layers of predominately medium dense to very dense clayey sandy silt, sandy silt, silty sand, and weathered rock or stiff to very stiff silty sandy clay and silty clay were encountered. Field and laboratory tests suggest that these soils are moderately strong and slightly compressible. Penetration resistance ranged from 38 blows per foot to greater than 50 blows per 6 inches. Dry densities ranged from 110 to 124 pcf. A representative soil sample consolidated approximately 1 percent under a 2 ksf load when saturated. A representative soil sample had an angle of internal friction of 32 degrees. A representative sample of the clayey soil had an expansion index of 55. These soils extended to the termination depth of our borings.

For additional information about the soils encountered, please refer to the boring logs in Appendix A.

GROUNDWATER

Test boring locations were checked for the presence of groundwater during and immediately following the drilling operations. Free groundwater was not encountered during our subsurface investigation.

It should be recognized that water table elevations may fluctuate with time, being dependent upon seasonal precipitation, irrigation, land use and climatic conditions, as well as other factors. Therefore, water level observations at the time of the field investigation may vary from those encountered during the construction phase of the project. The evaluation of such factors is beyond the scope of this report.

CONCLUSIONS AND RECOMMENDATIONS

Based on the findings of our field and laboratory investigations, along with previous geotechnical experience in the project area, the following is a summary of our evaluations, conclusions, and recommendations.

Administrative Summary

In brief, the subject site and soil conditions, with the exception of the loose surface soils, fill material, existing and previous developments, moderately sloping ground and moderate expansion potential of the on-site clayey soils, appear to be conducive to the development of the project. The surface soils have a loose consistency. These soils are disturbed, have low strength characteristics and are highly

compressible when saturated. Accordingly, it is recommended that the surface soils be recompacted. This compaction effort should stabilize the surface soils and locate any unsuitable or pliant areas not found during our field investigation.

Based on the Herzog Geotechnical Consulting Engineers investigation, approximately 1 to 6 feet of fill was encountered in portions of the site. The fill material predominately consisted of sandy clay, gravelly clay, sandy silt, gravelly silt, silty gravel and sandy gravel. The thickness and extent of fill material was determined based on limited test borings and visual observation. Thicker fill may be present at the site. Limited testing was performed on the fill soils during the time of the field and laboratory investigations. The limited testing indicates that the fill soils have varying strength characteristics ranging from loosely placed to compacted. Therefore, it is recommended the fill soils be excavated and stockpiled so that the native soils can be properly prepared. The clayey soils will not be suitable for reuse as non-expansive Engineered Fill. The clayey soils will be suitable for reuse as General Engineered Fill provided they are cleansed of excessive organics and debris and are moisture-conditioned to a minimum of 2 percent above optimum moisture content. Prior to fill placement Krazan & Associates, Inc. should inspect the bottom of the excavation to verify no additional removal will be required.

It is recommended that following stripping, tree removal operations, and fill removal operations, the upper 48 inches of native soil within the proposed building areas be excavated worked until uniform and free from large clods, moisture-conditioned to a minimum of 2 percent above optimum moisture content and recompacted to a minimum of 90 percent of maximum density based on ASTM Test Method D1557. In areas where the fill material is deeper than 4 feet, the depth of excavation of native soil may be reduced to 24 inches. In addition, in order to reduce the potential for differential settlement, it is recommended that the proposed structure foundations be supported by a minimum of 24 inches of Engineered Fill. Over-excavation should extend to a minimum of 5 feet beyond structural elements. The on-site, native soils and fill material will be suitable for reuse as general Engineered Fill, provided they are cleansed of excessive organics, debris, and fragments larger than 4 inches in maximum dimension. However, these soils will not be suitable for re-use as non-expansive Engineered Fill. Prior to backfilling, the bottom of the excavation should be proof rolled and observed by Krazan & Associates, Inc. to verify stability. This compaction effort should stabilize the surface soils and locate any unsuitable or pliant areas not found during our field investigation. Soft or pliant areas should be excavated to firm native ground. Fill material should be compacted to a minimum of 90 percent of maximum density based on ASTM Test Method D1557.

Following stripping, fill removal, and demolition activities, it is recommended that at a minimum, the upper 12 inches of exposed subgrade soils beneath the exterior flatwork and pavement areas be excavated/scarified, worked until uniform and free from large clods, moisture-conditioned to a minimum of 2 percent above optimum moisture content, and recompacted to a minimum of 90 percent of maximum density based on ASTM Test Method D1557. Limits of recompaction should extend a minimum of 2 feet beyond flatwork and pavements. This compaction effort should stabilize the upper soils and locate any unsuitable or pliant areas not found during our field investigation.

The upper soils within the site are predominately silty sandy clays, clayey sandy silts, sandy silts, and silty sands. The clayey soils appeared to have a moderate swell potential. The estimated swell pressures of the clayey soils may cause minor movement effecting slabs and possible stucco or similar brittle exterior finishes. To reduce potential soil movement, it is recommended the upper 24 inches of soil within slab-on-grade and exterior flatwork areas consist of 24 inches of non-expansive Engineered Fill. During construction, it is recommended that additional tests should be performed on the on-site soils to verify their physical and index properties. The non-expansive fill material should be a well-graded silty sand or sandy silt soil. A clean sand or very sandy soil is not acceptable for this purpose. A sandy soil will allow the surface water to drain into the expansive clayey soil below, which may result in soil swelling. The replacement soils and/or upper 24 inches of Imported Fill soils should meet the specifications as described under the subheading Engineered Fill. The non-expansive replacement soils should be compacted to at least 90 percent of relative compaction based on ASTM Test Method D1557. The exposed native soils in the excavation should not be allowed to dry out and should be kept continually moist, prior to backfilling. In addition, footings and slabs should be nominally reinforced to reduce cracking and vertical off-sets.

As an alternative to the use of non-expansive soils, the upper 24 inches of soil supporting the slab areas can consist of lime-treated clayey soils. The lime-treated soils should be recompacted to a minimum of 90 percent of maximum density. Preliminary application rate of lime should be 5 percent by dry weight. The lime material should be calcium oxide, commonly known as quick-lime. The clayey soils should be above optimum moisture during the mixing operations.

Presently, the site is occupied by a modular building and a parking lot. The site was previously developed with several buildings. Associated with these developments may be buried structures, such as utility and irrigation lines. Any surface or buried structures, including utilities or loosely backfilled excavations, encountered during construction should be properly removed and the resulting excavations backfilled. It is suspected demolition of the existing structures will disturb the upper soils. Areas disturbed by demolition activities should be excavated to firm native ground. The resulting excavations should be backfilled with Engineered Fill. This compaction effort should stabilize the upper soils and locate any unsuitable or pliant areas not found during our field investigation.

Trees are located within the site. Tree removal operations should include roots greater than 1 inch in diameter. The resulting excavations should be cleaned to firm native ground and backfilled with Engineered Fill compacted to a minimum of 90 percent of maximum density based on ASTM Test Method D1557.

The site includes moderately sloping terrain. It is recommended that cut and fill slopes be constructed 2:1 (horizontal to vertical) or flatter. In lieu of these slopes, retaining walls may be used. Cut and fill slopes for the building pads should not exceed 2:1 (horizontal to vertical). Cut and fill slopes may be revised as recommended by the Soils Engineer upon review of a more definitive site plan. In addition, it is recommended footings adjacent to the slopes be deepened to create a minimum setback of 10 feet or ⅓ the slope height from the top of the slope, whichever is greater.

Sandy soil conditions were encountered at the site. These cohesionless soils have a tendency to cave in trench wall excavations. Shoring or sloping back trench sidewalls may be required within these sandy soils.

After completion of the recommended site preparation and over-excavation, the site should be suitable for shallow footing support. The proposed structure footings may be designed utilizing an allowable bearing pressure of 2,500 psf for dead-plus-live loads. Footings should have a minimum embedment of 24 inches.

Groundwater Influence on Structures/Construction

Based on our findings and historical records, it is not anticipated that groundwater will rise within the zone of structural influence or affect the construction of foundations and pavements for the project. However, if earthwork is performed during or soon after periods of precipitation, the subgrade soils may become saturated, pump, or not respond to densification techniques. Typical remedial measures include: discing and aerating the soil during dry weather; mixing the soil with dryer materials; removing and replacing the soil with an approved fill material; or mixing the soil with an approved lime or cement product. Our firm should be consulted prior to implementing remedial measures to observe the unstable subgrade conditions and provide appropriate recommendations.

Site Preparation

General site clearing should include removal of vegetation; existing utilities; structures including foundations; basement walls and floors; existing stockpiled soil; trees and associated root systems; rubble; rubbish; and any loose and/or saturated materials. Site stripping should extend to a minimum depth of 2 to 4 inches, or until all organics in excess of 3 percent by volume are removed. Deeper stripping may be required in localized areas. These materials will not be suitable for reuse as Engineered Fill. However, stripped topsoil may be stockpiled and reused in landscape or non-structural areas.

Presently, the site is occupied by a modular building and a parking lot. The site was previously developed with several buildings. Associated with these developments may be buried structures, such as utility and irrigation lines. Any surface or buried structures, such as utilities or loosely backfilled excavations, encountered during construction should be properly removed and the resulting excavations backfilled. After demolition activities, it is recommended that these disturbed soils be removed and/or recompacted. Excavations, depressions, or soft and pliant areas extending below planned, finished subgrade levels should be cleaned to firm, undisturbed soil and backfilled with Engineered Fill. In general, any septic tanks, debris pits, cesspools, or similar structures should be entirely removed. Concrete footings should be removed to an equivalent depth of at least 3 feet below proposed footing elevations or as recommended by the Soils Engineer. Any other buried structures should be removed in accordance with the recommendations of the Soils Engineer. The resulting excavations should be backfilled with Engineered Fill.

Based on the Herzog Geotechnical Consulting Engineers investigation, approximately 1 to 6 feet of fill was encountered in portions of the site. The fill material predominately consisted of sandy clay, gravelly clay, sandy silt, gravelly silt, silty gravel and sandy gravel. The thickness and extent of fill material was

determined based on limited test borings and visual observation. Thicker fill may be present at the site. Limited testing was performed on the fill soils during the time of the field and laboratory investigations. The limited testing indicates that the fill soils have varying strength characteristics ranging from loosely placed to compacted. Therefore, it is recommended the fill soils be excavated and stockpiled so that the native soils can be properly prepared. The clayey soils will not be suitable for reuse as non-expansive Engineered Fill. The clayey soils will be suitable for reuse as General Engineered Fill provided they are cleansed of excessive organics and debris and are moisture-conditioned to a minimum of 2 percent above optimum moisture content. Prior to fill placement Krazan & Associates, Inc. should inspect the bottom of the excavation to verify no additional removal will be required.

Several trees are located along the edges of the site. If not utilized for the proposed development, tree removal operations should include roots greater than 1 inch in diameter. The resulting excavations should be backfilled with Engineered Fill compacted to a minimum of 90 percent of maximum density based on ASTM Test Method D1557.

It is recommended that following stripping, tree removal operations, and fill removal operations, the upper 48 inches of native soil within the proposed building areas be excavated worked until uniform and free from large clods, moisture-conditioned to a minimum of 2 percent above optimum moisture content and recompacted to a minimum of 90 percent of maximum density based on ASTM Test Method D1557. In areas where the fill material is deeper than 4 feet, the depth of excavation of native soil may be reduced to 24 inches. In addition, in order to reduce the potential for differential settlement, it is recommended that the proposed structure foundations be supported by a minimum of 24 inches of non-expansive or lime-treated Engineered Fill. Over-excavation should extend to a minimum of 5 feet beyond structural elements. The on-site, native soils and fill material will be suitable for reuse as general Engineered Fill, provided they are cleansed of excessive organics, debris, and fragments larger than 4 inches in maximum dimension. However, these soils will not be suitable for re-use as non-expansive Engineered Fill. Prior to backfilling, the bottom of the excavation should be proof rolled and observed by Krazan & Associates, Inc. to verify stability. This compaction effort should stabilize the surface soils and locate any unsuitable or pliant areas not found during our field investigation. Soft or pliant soils should be excavated to firm native ground. Fill material should be compacted to a minimum of 90 percent of maximum density based on ASTM Test Method D1557.

Following stripping, fill removal, and demolition activities, it is recommended that at a minimum, the upper 12 inches of exposed subgrade soils beneath the exterior flatwork and pavement areas be excavated/scarified, worked until uniform and free from large clods, moisture-conditioned to a minimum of 2 percent above optimum moisture content, and recompacted to a minimum of 90 percent of maximum density based on ASTM Test Method D1557. Limits of recompaction should extend a minimum of 2 feet beyond flatwork and pavements. This compaction effort should stabilize the upper soils and locate any unsuitable or pliant areas not found during our field investigation.

The upper soils within the site are predominately silty sandy clays, clayey sandy silts, and sandy silts. These soils appeared to have a moderate swell potential. The estimated swell pressures of the clayey soils may cause minor movement effecting slabs and possible stucco or similar brittle exterior finishes. To reduce potential soil movement, it is recommended the upper 24 inches of soil within slab-on-grade

and exterior flatwork areas consist of 24 inches of non-expansive Engineered Fill. During construction, it is recommended that additional tests should be performed on the on-site soils to verify their physical and index properties. The non-expansive fill material should be a well-graded silty sand or sandy silt soil. A clean sand or very sandy soil is not acceptable for this purpose. A sandy soil will allow the surface water to drain into the expansive clayey soil below, which may result in soil swelling. The replacement soils and/or upper 24 inches of Imported Fill soils should meet the specifications as described under the subheading Engineered Fill. The non-expansive replacement soils should be compacted to at least 90 percent of relative compaction based on ASTM Test Method D1557. The exposed native soils in the excavation should not be allowed to dry out and should be kept continually moist, prior to backfilling. In addition, footings and slabs should be nominally reinforced to reduce cracking and vertical off-sets.

As an alternative to the use of non-expansive soils, the upper 24 inches of soil supporting the slab areas can consist of lime-treated clayey soils. The lime-treated soils should be recompacted to a minimum of 90 percent of maximum density. Preliminary application rate of lime should be 5 percent by dry weight. The lime material should be calcium oxide, commonly known as quick-lime. The clayey soils should be above optimum moisture during the mixing operations.

It is recommended that the proposed cut and fill slopes be constructed 2:1 (horizontal to vertical). In lieu of the recommended slopes, retaining walls may be used.

Where fills greater than 8 feet are to be constructed on original ground that slopes at inclinations exceeding 6:1 (horizontal to vertical), benches should be cut into the natural slope as the filling operations proceed. Each bench should consist of a level terrace a minimum of 10 feet wide, with the rise to the next bench held for 4 feet or less. Where fills of comparable height will be constructed on ground that slopes at an inclination exceeding 4:1 (horizontal to vertical), a keyway should be provided in addition to the benches. Each keyway should consist of a level trench at least 10 feet wide and at least 2 feet deep, with side slopes not exceeding 1:1 (horizontal to vertical), cut into the natural slope.

The upper soils, during wet winter months, become very moist due to the absorptive characteristics of the soil. Earthwork operations performed during winter months may encounter very moist unstable soils, which may require removal to grade a stable building foundation. Project site winterization consisting of placement of aggregate base and protecting exposed soils during the construction phase should be performed.

A representative of our firm should be present during all site clearing and grading operations to test and observe earthwork construction. This testing and observation is an integral part of our service, as acceptance of earthwork construction is dependent upon compaction and stability of the material. The Soils Engineer may reject any material that does not meet compaction and stability requirements. Further recommendations of this report are predicated upon the assumption that earthwork construction will conform to recommendations set forth in this section and the Engineered Fill section.

Slope Construction/Reconstruction

Slopes can be reconstructed by placement of Engineered Fill utilizing a keying and benching procedure as described below. Reconstructed slopes should be constructed at an inclination not exceeding 2:1 (horizontal to vertical). Krazan and Associates, Inc. should be retained to review all slope reconstruction plans and specifications prior to initiating the repair work.

General site clearing should include removal of vegetation, any loose and/or saturated materials. Excavations or depressions extending below subgrade levels should be cleaned to firm, undisturbed soil and backfilled with Engineered Fill, placed and recompacted in accordance with the recommendations stated herein.

Where fills greater than 8 feet are to be constructed on original ground that slopes at inclinations steeper than 6:1 (horizontal to vertical), benches should be cut into the existing slope as the filling operations proceed. Each bench should consist of a level terrace a minimum of 10 feet wide, with the rise to the next bench held to 4 feet or less. Where fills of comparable height will be constructed on ground that slopes at an inclination steeper than 4:1 (horizontal to vertical), a keyway should be provided in addition to the benches. Each keyway should consist of a level trench at least 10 feet wide and at least 2 feet deep, with side slopes not exceeding 1:1 (horizontal to vertical), cut into the existing slope. Where fills of comparable height will be constructed on ground that slopes at an inclination steeper than 2:1 (horizontal to vertical), geotextile fabric and retaining structures should be utilized in slope construction where subsequent specific building site investigations warrant.

Site grading near the crowns of the reconstructed slopes should be accomplished such that excessive sheet run-off is prevented.

The completed slopes should be seeded or otherwise vegetated to protect from future erosion. Well vegetated slopes at the recommended configuration should be reasonably protected from typical erosional effects. However, vegetated slopes may not be protected from unusual flow conditions, such as flood events or over-topping of the development's storm drainage system. If erosion control from unusual flow conditions is desired, more substantial erosion protection measures, such as grouted cobble slope facing or manufactured slope protection products should be considered.

Engineered Fill

The organic-free, on-site, upper native soils are predominately silty sandy clays, clayey sandy silts, sandy silts, and silty sands. The clayey soils will not be suitable for reuse as non-expansive Engineered Fill. The clayey soils will be suitable for reuse for fill placement within the upper 24 inches of slab-on-grade and exterior flatwork areas, provided they are lime-treated. The preliminary application rate of lime should be 5 percent by dry weight. The lime material should be calcium oxide, commonly known as quick-lime. The clayey soils should be above optimum moisture-condition during mixing operations. Additional testing is recommended to determine the appropriate application rate of lime prior to placement. These clayey soils will be suitable for reuse as General Engineered Fill provided they are

cleansed of excessive organics, debris, and moisture-conditioned to at least 2 percent above optimum moisture. It is recommended that additional testing be performed on the on-site soils and fill material to evaluate the physical and index properties prior to reuse as Engineered Fill.

The preferred materials specified for Engineered Fill are suitable for most applications with the exception of exposure to erosion. Project site winterization and protection of exposed soils during the construction phase should be the sole responsibility of the Contractor, since he has complete control of the project site at that time.

Imported Fill should consist of a well-graded, slightly cohesive, fine silty sand or sandy silt soil, with relatively impervious characteristics when compacted. This material should be approved by the Soils Engineer prior to use and should typically possess the following characteristics:

Percent Passing No. 200 Sieve	20 to 50
Plasticity Index	10 maximum
UBC Standard 29-2 Expansion Index	15 maximum

Fill soils should be placed in lifts approximately 6 inches thick, moisture-conditioned to a minimum of 2 percent above optimum moisture content, and compacted to achieve at least 90 percent of maximum density based on ASTM D1557. Additional lifts should not be placed if the previous lift did not meet the required dry density or if soil conditions are not stable.

Drainage and Landscaping

The ground surface should slope away from building pad and pavement areas toward appropriate drop inlets or other surface drainage devices. In accordance with Section 1804 of the 2019 California Building Code, it is recommended that the ground surface adjacent to foundations be sloped a minimum of 5 percent for a minimum distance of 10 feet away from structures, or to an approved alternative means of drainage conveyance. Swales used for conveyance of drainage and located within 10 feet of foundations should be sloped a minimum of 2 percent. Impervious surfaces, such as pavement and exterior concrete flatwork, within 10 feet of building foundations should be sloped a minimum of 1 percent away from the structure. Drainage gradients should be maintained to carry all surface water to collection facilities and off-site. These grades should be maintained for the life of the project.

Slots or weep holes should be placed in drop inlets or other surface drainage devices in pavement areas to allow free drainage of adjoining base course materials. Cutoff walls should be installed at pavement edges adjacent to vehicular traffic areas these walls should extend to a minimum depth of 12 inches below pavement subgrades to limit the amount of seepage water that can infiltrate the pavements. Where cutoff walls are undesirable subgrade drains can be constructed to transport excess water away from planters to drainage interceptors. If cutoff walls can be successfully used at the site, construction of subgrade drains is considered unnecessary.

Utility Trench Backfill

Utility trenches should be excavated according to accepted engineering practice following OSHA (Occupational Safety and Health Administration) standards by a Contractor experienced in such work. The responsibility for the safety of open trenches should be borne by the Contractor. Traffic and vibration adjacent to trench walls should be reduced; cyclic wetting and drying of excavation side slopes should be avoided. Depending upon the location and depth of some utility trenches, groundwater flow into open excavations could be experienced; especially during or following periods of precipitation.

Utility trench backfill placed in or adjacent to buildings and exterior slabs should be compacted to at least 90 percent of maximum density based on ASTM Test Method D1557. The utility trench backfill placed in pavement areas should be compacted to at least 90 percent of maximum density based on ASTM Test Method D1557. Pipe bedding should be in accordance with pipe manufacturer's recommendations.

Sandy soil conditions were encountered at the site. These cohesionless soils have a tendency to cave in trench wall excavation. Shoring or sloping back trench sidewalls may be required within these soils.

The Contractor is responsible for removing all water-sensitive soils from the trench regardless of the backfill location and compaction requirements. The Contractor should use appropriate equipment and methods to avoid damage to the utilities and/or structures during fill placement and compaction.

Foundations

The proposed structure may be supported on a shallow foundation system bearing on a minimum of 24 inches of non-expansive or lime-treated Engineered Fill. Spread and continuous footings can be designed for the following maximum allowable soil bearing pressures:

Load	Allowable Loading
Dead Load Only	1,875 psf
Dead-Plus-Live Load	2,500 psf
Total Load, Including Wind or Seismic Loads	3,325 psf

The footings should have a minimum embedment depth of 24 inches below pad subgrade (soil grade) or adjacent exterior grade, whichever is lower. In addition, it is recommended footings adjacent to the slopes be deepened to create a minimum setback of 10 feet or ⅓ the slope height from the top of the slope, whichever is greater. Footings should have a minimum width of 12 inches, regardless of load.

The footing excavations should not be allowed to dry out any time prior to pouring concrete. It is recommended that footings be reinforced by at least one No. 4 reinforcing bar in both top and bottom.

Resistance to lateral footing displacement can be computed using an allowable friction factor of 0.3 acting between the base of foundations and the supporting subgrade. Lateral resistance for footings can alternatively be developed using an allowable equivalent fluid passive pressure of 250 pounds per cubic foot acting against the appropriate vertical footing faces. The frictional and passive resistance of the soil may be combined without reduction in determining the total lateral resistance. A ⅓ increase in the value above may be used for short duration, wind, or seismic loads.

Floor Slabs and Exterior Flatwork

To reduce post-construction soil movement beneath floor slabs and exterior flatwork, it is recommended that mitigation measures be performed. For conventional slab-on-grade, it is recommended that the upper 24 inches of soil consist of non-expansive or lime-treated Engineered Fill.

In areas that will utilize moisture-sensitive floor coverings, concrete slab-on-grade floors should be underlain by a water vapor retarder. The water vapor retarder should be installed in accordance with accepted engineering practice. The water vapor retarder should consist of a vapor retarder sheeting underlain by a minimum of 3 inches of compacted, clean, gravel of ¾-inch maximum size. To aid in concrete curing an optional 2 to 4 inches of granular fill may be placed on top of the vapor retarder. The granular fill should consist of damp clean sand with at least 10 to 30 percent of the sand passing the 100 sieve. The sand should be free of clay, silt, or organic material. Rock dust which is manufactured sand from rock crushing operations is typically suitable for the granular fill. This granular fill material should be compacted.

It is recommended that the concrete slabs be reinforced at a minimum with No. 3 reinforcing bars, placed at 18 inches on center in each direction within the slabs middle third, to reduce crack separation and possible vertical offset at the cracks. Thicker floor slabs with increased concrete strength and reinforcement should be designed wherever heavy concentrated loads, heavy equipment, or machinery is anticipated.

The exterior floors should be poured separately in order to act independently of the walls and foundation system. Exterior finish grades should be sloped a minimum of 2 percent away from all interior slab areas to preclude ponding of water adjacent to the structures. All fills required to bring the building pads to grade should be Engineered Fills.

Moisture within the structure may be derived from water vapors, which were transformed from the moisture within the soils. This moisture vapor can travel through the vapor membrane and penetrate the slab-on-grade. This moisture vapor penetration can affect floor coverings and produce mold and mildew in the structure. To reduce moisture vapor intrusion, it is recommended that a vapor retarder be installed. It is recommended that the utility trenches within the structure be compacted, as specified in our report, to reduce the transmission of moisture through the utility trench backfill. Special attention to the immediate drainage and irrigation around the building is recommended. Positive drainage should be established away from the structure and should be maintained throughout the life of the structure. Ponding of water should not be allowed adjacent to the structure. Over-irrigation within landscaped areas adjacent to the structure should not be performed. In addition, ventilation of the structure (i.e. ventilation fans) is recommended to reduce the accumulation of interior moisture.

Lateral Earth Pressures and Retaining Walls

Walls retaining horizontal backfill and capable of deflecting a minimum of 0.1 percent of its height at the top may be designed using an equivalent fluid active pressure of 50 pounds per square foot per foot of depth. Walls that are incapable of this deflection or walls that are fully constrained against deflection may be designed for an equivalent fluid at-rest pressure of 70 pounds per square foot per foot per depth. Expansive soils should not be used for backfill against walls. The wedge of non-expansive backfill material should extend from the bottom of each retaining wall outward and upward at a slope of 2:1 (horizontal to vertical) or flatter. The stated lateral earth pressures do not include the effects of hydrostatic water pressures generated by infiltrating surface water that may accumulate behind the retaining walls; or loads imposed by construction equipment, foundations, or roadways.

During grading and backfilling operations adjacent to any walls, heavy equipment should not be allowed to operate within a lateral distance of 5 feet from the wall, or within a lateral distance equal to the wall height, whichever is greater, to avoid developing excessive lateral pressures. Within this zone, only hand operated equipment ("whackers," vibratory plates, or pneumatic compactors) should be used to compact the backfill soils.

Retaining and/or below grade walls should be drained with either perforated pipe encased in free-draining gravel or a prefabricated drainage system. The gravel zone should have a minimum width of 12 inches wide and should extend upward to within 12 inches of the top of the wall. The upper 12 inches of backfill should consist of native soils, concrete, asphaltic concrete or other suitable backfill to reduce surface drainage into the wall drain system. The aggregate should conform to Class 2 permeable materials graded in accordance with the CalTrans Standard Specifications (2018). Prefabricated drainage systems, such as Miradrain®, Enkadrain®, or an equivalent substitute, are acceptable alternatives in lieu of gravel provided they are installed in accordance with the manufacturer's recommendations. If a prefabricated drainage system is proposed, our firm should review the system for final acceptance prior to installation.

Drainage pipes should be placed with perforations down and should discharge in a non-erosive manner away from foundations and other improvements. The pipes should be placed no higher than 6 inches above the heel of the wall in the center line of the drainage blanket and should have a minimum diameter of 4 inches. Collector pipes may be either slotted or perforated. Slots should be no wider than ⅛ inch in diameter, while perforations should be no more than ¼ inch in diameter. If retaining walls are less than 6 feet in height, the perforated pipe may be omitted in lieu of weep holes on 4 feet maximum spacing. The weep holes should consist of 4-inch diameter holes (concrete walls) or unmortared head joints (masonry walls) and not be higher than 18 inches above the lowest adjacent grade. Two 8-inch square overlapping patches of geotextile fabric (conforming to the CalTrans Standard Specifications for "edge drains") should be affixed to the rear wall opening of each weep hole to retard soil piping.

R-Value Test Results and Pavement Design

One subgrade soil sample was obtained from the project site for R-value testing at the location shown on the attached site plan. The sample was tested in accordance with the State of California Materials Manual Test Designation 301. Results of the test are as follows:

Sample	Depth	Description	R-Value at Equilibrium
1	12-24"	Silty Sandy Clay (CL)	20

The test results are low and indicate poor subgrade support characteristics under dynamic traffic loads. The following table shows the recommended pavement sections for various traffic indices.

Traffic Index	Asphaltic Concrete	Class II Aggregate Base*	Class III Aggregate Subbase	Compacted Subgrade**
4	2.0"	6.5"	--	12.0"
4	2.0"	4.5"	2.0"	12.0"
4.5	2.5"	7.0"	--	12.0"
4.5	2.5"	4.0"	3.0"	12.0"
5	2.5"	8.0"	--	12.0"
5	2.5"	5.0"	3.5"	12.0"
5.5	3.0"	8.5"	--	12.0"
5.5	3.0"	5.0"	4.0"	12.0"
6	3.0"	10.5"	--	12.0"
6	3.0"	6.5"	4.5"	12.0"
6.5	3.5"	11.0"	--	12.0"
6.5	3.5"	6.0"	5.0"	12.0"
7	4.0"	12.0"	--	12.0"
7	4.0"	6.5"	6.0"	12.0"
7.5	4.0"	13.0"	--	12.0"
7.5	4.0"	7.5"	6.0"	12.0"

**** 95% compaction based on ASTM Test Method D1557 or CAL 216***
***** 90% compaction based on ASTM Test Method D1557 or CAL 216***

If traffic indices are not available, an estimated (typical value) index of 4.5 may be used for light automobile traffic, and an index of 7.0 may be used for light truck traffic.

The following recommendations are for light-duty and heavy-duty Portland Cement Concrete Pavement Sections based on the design procedures developed by the Portland Cement Association.

PORTLAND CEMENT PAVEMENT
LIGHT DUTY

Traffic Index	Portland Cement Concrete***	Class II Aggregate Base*	Compacted Subgrade**
4.5	6.0"	5.0"	12.0"

HEAVY DUTY

Traffic Index	Portland Cement Concrete***	Class II Aggregate Base*	Compacted Subgrade**
7.0	7.0"	6.0"	12.0"

**** 95% compaction based on ASTM Test Method D1557 or CAL 216***
***** 90% compaction based on ASTM Test Method D1557 or CAL 216***
******Minimum Compressive Strength of 3000 psi***

As indicated previously, fill material may be located throughout the site. It is recommended that any uncertified fill material encountered within pavement areas be removed and/or recompacted. The fill material should be moisture-conditioned to near optimum moisture and recompacted to a minimum of 90 percent of maximum density based on ASTM Test Method D1557. As an alternative, the Owner may elect not to recompact the existing fill within paved areas. However, the Owner should be aware that the paved areas may settle which may require annual maintenance. At a minimum, it is recommended that the upper 12 inches of subgrade soil be moisture-conditioned as necessary and recompacted to a minimum of 90 percent of maximum density based on ASTM Test Method D1557.

Seismic Parameters – 2019 California Building Code

The Site Class per Section 1613 of the 2019 California Building Code (2019 CBC) and ASCE 7-16, Chapter 20 is based upon the site soil conditions. It is our opinion that a Site Class D is most consistent with the subject site soil conditions. For seismic design of the structures based on the seismic provisions of the 2019 CBC, we recommend the following parameters:

Seismic Item	Value	CBC Reference
Site Class	D	Section 1613.2.2
Site Coefficient F_a	1.000	Table 1613.2.3 (1)
S_s	1.500	Section 1613.2.1
S_{MS}	1.500	Section 1613.2.3
S_{DS}	1.000	Section 1613.2.4
Site Coefficient F_v	1.700	Table 1613.2.3 (2)
S_1	0.600	Section 1613.2.1
S_{M1}	1.020	Section 1613.2.3
S_{D1}	0.680	Section 1613.2.4
T_S	0.680	Section 1613.2

* Based on Equivalent Lateral Force (ELF) Design Procedure being used.

Soil Cement Reactivity

Excessive sulfate in either the soil or native water may result in an adverse reaction between the cement in concrete (or stucco) and the soil. HUD/FHA and CBC have developed criteria for evaluation of sulfate levels and how they relate to cement reactivity with soil and/or water.

Soil samples were obtained from the site and tested in accordance with State of California Materials Manual Test Designation 417. The sulfate concentrations detected in these soil samples were less than 150 ppm and are below the maximum allowable values established by HUD/FHA and CBC. However, it is recommended that a Type II cement be used within the concrete to compensate for sulfate reactivity with the cement.

Compacted Material Acceptance

Compaction specifications are not the only criteria for acceptance of the site grading or other such activities. However, the compaction test is the most universally recognized test method for assessing the performance of the Grading Contractor. The numerical test results from the compaction test cannot be used to predict the engineering performance of the compacted material. Therefore, the acceptance of compacted materials will also be dependent on the stability of that material. The Soils Engineer has the option of rejecting any compacted material regardless of the degree of compaction if that material is considered to be unstable or if future instability is suspected. A specific example of rejection of fill material passing the required percent compaction is a fill which has been compacted with an in situ moisture content significantly less than optimum moisture. This type of dry fill (brittle fill) is susceptible to future settlement if it becomes saturated or flooded.

Testing and Inspection

A representative of Krazan & Associates, Inc. should be present at the site during the earthwork activities to confirm that actual subsurface conditions are consistent with the exploratory fieldwork. This activity is an integral part of our service, as acceptance of earthwork construction is dependent upon compaction testing and stability of the material. This representative can also verify that the intent of these recommendations is incorporated into the project design and construction. Krazan & Associates, Inc. will not be responsible for grades or staking, since this is the responsibility of the Prime Contractor.

LIMITATIONS

Soils Engineering is one of the newest divisions of Civil Engineering. This branch of Civil Engineering is constantly improving as new technologies and understanding of earth sciences advance. Although your site was analyzed using the most appropriate and most current techniques and methods, undoubtedly there will be substantial future improvements in this branch of engineering. In addition to advancements in the field of Soils Engineering, physical changes in the site, either due to excavation or fill placement, new agency regulations, or possible changes in the proposed structure after the soils report is completed may require the soils report to be professionally reviewed. In light of this, the

Owner should be aware that there is a practical limit to the usefulness of this report without critical review. Although the time limit for this review is strictly arbitrary, it is suggested that 2 years be considered a reasonable time for the usefulness of this report.

Foundation and earthwork construction is characterized by the presence of a calculated risk that soil and groundwater conditions have been fully revealed by the original foundation investigation. This risk is derived from the practical necessity of basing interpretations and design conclusions on limited sampling of the earth. The recommendations made in this report are based on the assumption that soil conditions do not vary significantly from those disclosed during our field investigation. If any variations or undesirable conditions are encountered during construction, the Soils Engineer should be notified so that supplemental recommendations may be made.

The conclusions of this report are based on the information provided regarding the proposed construction. If the proposed construction is relocated or redesigned, the conclusions in this report may not be valid. The Soils Engineer should be notified of any changes so the recommendations may be reviewed and re-evaluated.

This report is a Geotechnical Engineering Investigation with the purpose of evaluating the soil conditions in terms of foundation design. The scope of our services did not include any Environmental Site Assessment for the presence or absence of hazardous and/or toxic materials in the soil, groundwater, or atmosphere; or the presence of wetlands. Any statements, or absence of statements, in this report or on any boring log regarding odors, unusual or suspicious items, or conditions observed, are strictly for descriptive purposes and are not intended to convey engineering judgment regarding potential hazardous and/or toxic assessment.

The geotechnical engineering information presented herein is based upon professional interpretation utilizing standard engineering practices and a degree of conservatism deemed proper for this project. It is not warranted that such information and interpretation cannot be superseded by future geotechnical engineering developments. We emphasize that this report is valid for the project outlined above and should not be used for any other sites.

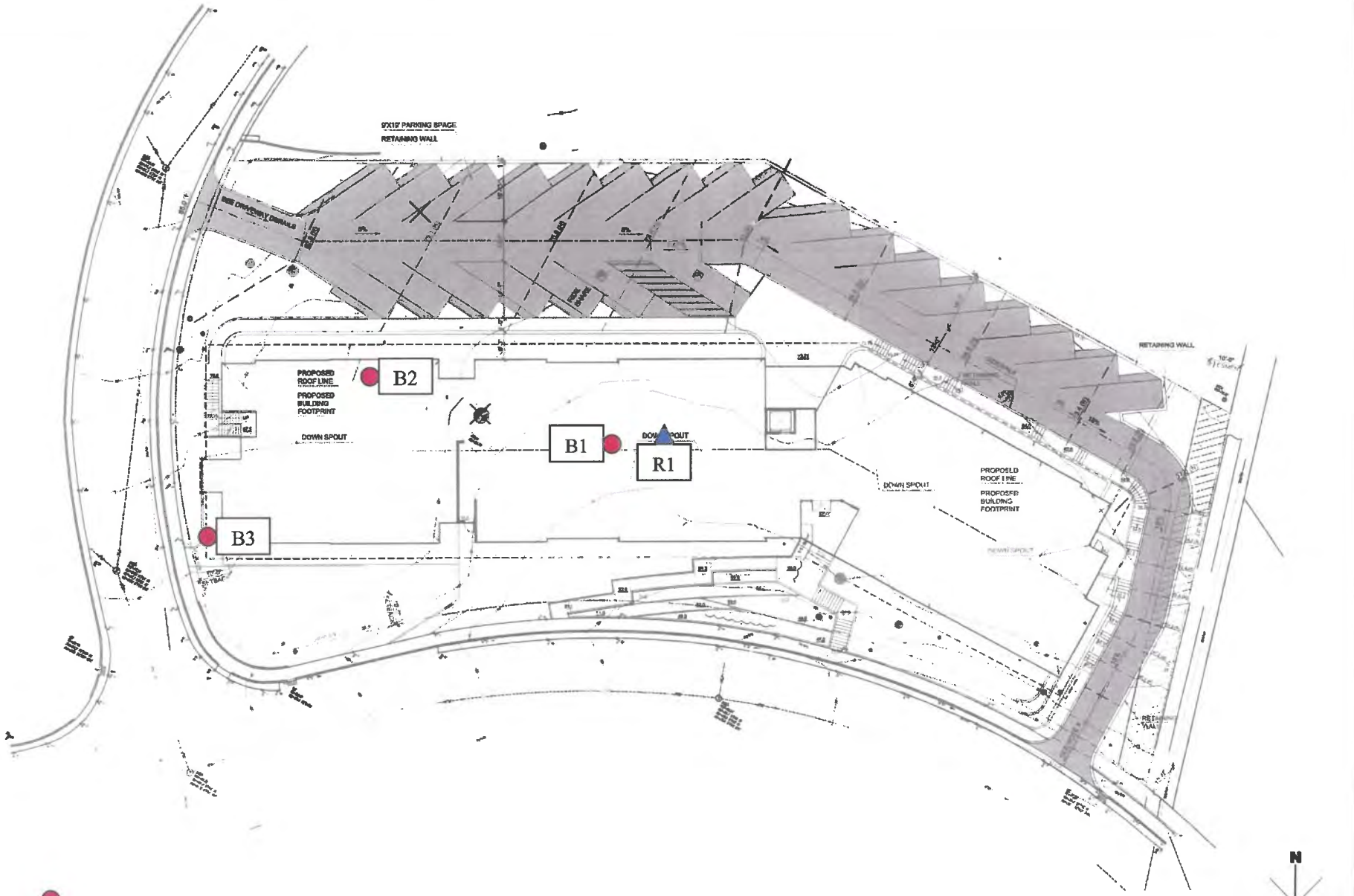
If you have any questions, or if we may be of further assistance, please do not hesitate to contact our office at (925) 307-1160.

Respectfully submitted,
KRAZAN & ASSOCIATES, INC.

Madison K. Weber
Project Engineer
RCE No. 81935

David R. Jarosz, II
Managing Engineer
RGE No. 2698/RCE No. 60185

MKW/DRJ:ht



● APPROXIMATE BORING LOCATION

▲ APPROXIMATE R-VALUE LOCATION

SITE MAP	**Scale:** NTS	**Date:** October 2020
Multi-Family Development **825 Drake Avenue** **Marin City, California**	**Drawn by:** HT	**Approved by:** DJ
	Project No. 042-20043	**Figure No.** 1

Krazan
GEOTECHNICAL ENGINEERING

APPENDIX A

FIELD AND LABORATORY INVESTIGATIONS

Field Investigation

The field investigation consisted of a surface reconnaissance and a subsurface exploratory program. Three 4½-inch to 6½-inch diameter exploratory borings were advanced. The boring locations are shown on the site plan.

The soils encountered were logged in the field during the exploration and with supplementary laboratory test data are described in accordance with the Unified Soil Classification System.

Modified standard penetration tests and standard penetration tests were performed at selected depths. These tests represent the resistance to driving a 2½-inch and 1½-inch diameter split barrel sampler, respectively. The driving energy was provided by a hammer weighing 140 pounds falling 30 inches. Relatively undisturbed soil samples were obtained while performing this test. Bag samples of the disturbed soil were obtained from the auger cuttings. The modified standard penetration tests are identified in the sample type on the boring logs with a full shaded in block. The standard penetration tests are identified in the sample type on the boring logs with half of the block shaded. All samples were returned to our Clovis laboratory for evaluation.

Laboratory Investigation

The laboratory investigation was programmed to determine the physical and mechanical properties of the foundation soil underlying the site. Test results were used as criteria for determining the engineering suitability of the surface and subsurface materials encountered.

In-situ moisture content, dry density, consolidation, direct shear and sieve analysis tests were completed for the undisturbed samples representative of the subsurface material. Expansion index and R-value tests were completed for select bag samples obtained from the auger cuttings. These tests, supplemented by visual observation, comprised the basis for our evaluation of the site material.

The logs of the exploratory borings and laboratory determinations are presented in this Appendix.

UNIFIED SOIL CLASSIFICATION SYSTEM

UNIFIED SOIL CLASSIFICATION AND SYMBOL CHART

COARSE-GRAINED SOILS (more than 50% of material is larger than No. 200 sieve size.)			
GRAVELS More than 50% of coarse fraction larger than No. 4 sieve size	Clean Gravels (Less than 5% fines)	GW	Well-graded gravels, gravel-sand mixtures, little or no fines
		GP	Poorly-graded gravels, gravel-sand mixtures, little or no fines
	Gravels with fines (More than 12% fines)	GM	Silty gravels, gravel-sand-silt mixtures
		GC	Clayey gravels, gravel-sand-clay mixtures
SANDS 50% or more of coarse fraction smaller than No. 4 sieve size	Clean Sands (Less than 5% fines)	SW	Well-graded sands, gravelly sands, little or no fines
		SP	Poorly graded sands, gravelly sands, little or no fines
	Sands with fines (More than 12% fines)	SM	Silty sands, sand-silt mixtures
		SC	Clayey sands, sand-clay mixtures
FINE-GRAINED SOILS (50% or more of material is smaller than No. 200 sieve size.)			
SILTS AND CLAYS Liquid limit less than 50%		ML	Inorganic silts and very fine sands, rock flour, silty of clayey fine sands or clayey silts with slight plasticity
		CL	Inorganic clays of low to medium plasticity, gravelly clays, sandy clays, silty clays, lean clays
		OL	Organic silts and organic silty clays of low plasticity
SILTS AND CLAYS Liquid limit 50% or greater		MH	Inorganic silts, micaceous or diatomaceous fine sandy or silty soils, elastic silts
		CH	Inorganic clays of high plasticity, fat clays
		OH	Organic clays of medium to high plasticity, organic silts
HIGHLY ORGANIC SOILS		PT	Peat and other highly organic soils

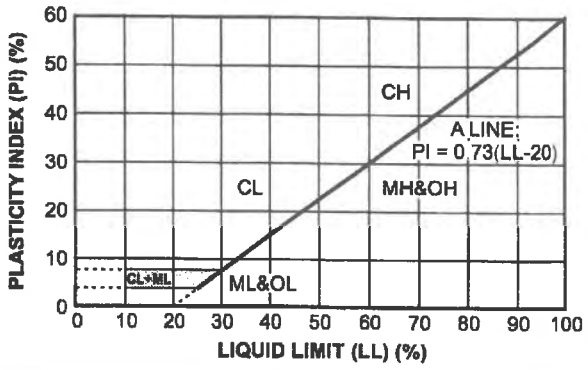
CONSISTENCY CLASSIFICATION

Description	Blows per Foot
Granular Soils	
Very Loose	< 5
Loose	5 – 15
Medium Dense	16 – 40
Dense	41 – 65
Very Dense	> 65
Cohesive Soils	
Very Soft	< 3
Soft	3 – 5
Firm	6 – 10
Stiff	11 – 20
Very Stiff	21 – 40
Hard	> 40

GRAIN SIZE CLASSIFICATION

Grain Type	*Standard Sieve Size*	*Grain Size in Millimeters*
Boulders	Above 12 inches	Above 305
Cobbles	12 to 13 inches	305 to 76.2
Gravel	3 inches to No. 4	76.2 to 4.76
Coarse-grained	3 to ¾ inches	76.2 to 19.1
Fine-grained	¾ inches to No. 4	19.1 to 4.76
Sand	No. 4 to No. 200	4.76 to 0.074
Coarse-grained	No. 4 to No. 10	4.76 to 2.00
Medium-grained	No. 10 to No. 40	2.00 to 0.042
Fine-grained	No. 40 to No. 200	0.042 to 0.074
Silt and Clay	Below No. 200	Below 0.074

PLASTICITY CHART



Log of Boring B1

Project: Multi-Family Development

Project No: 042-20043

Client: AMG & Associates, LLC

Figure No.: A-1

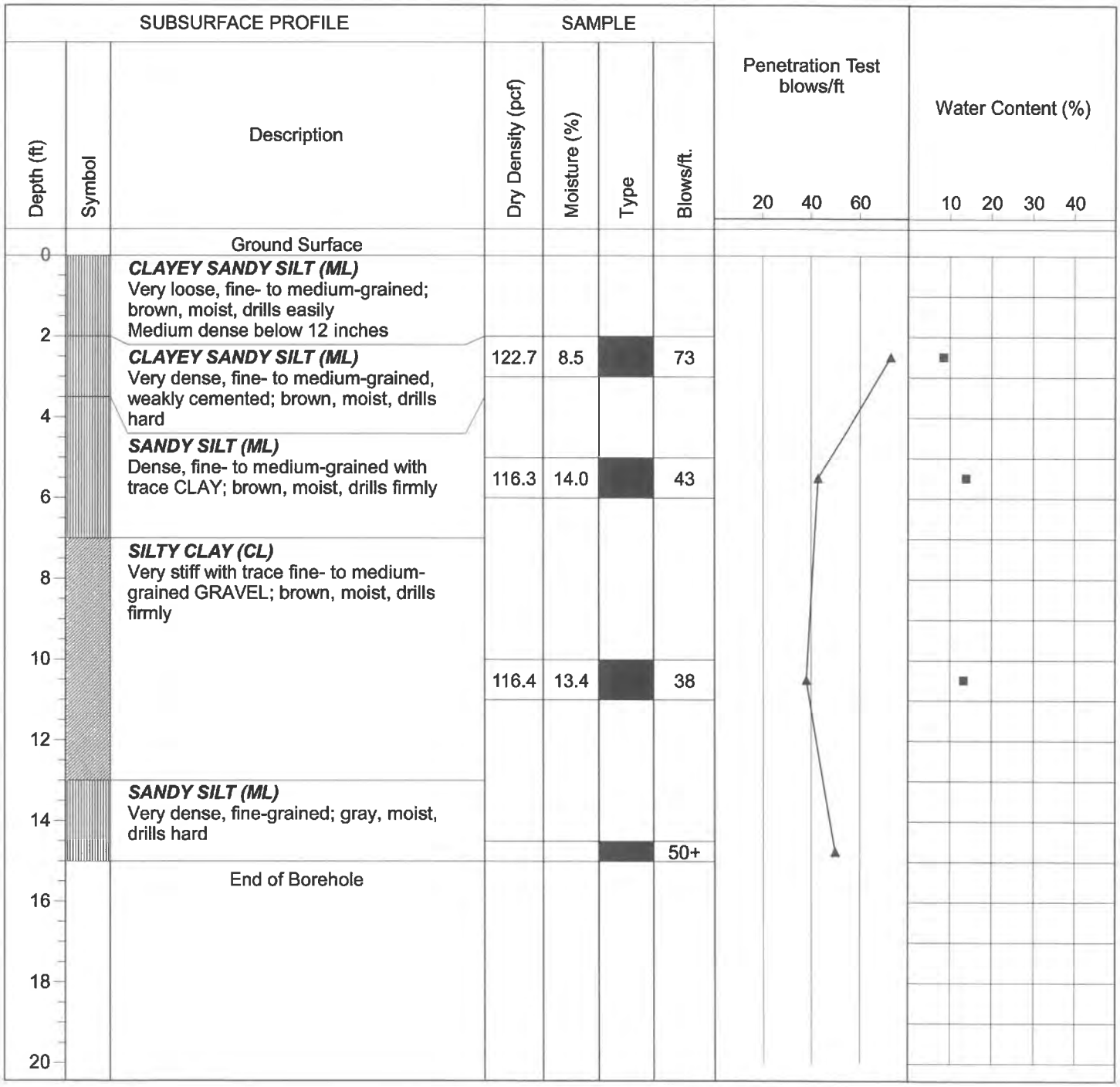
Location: 825 Drake Avenue, Marin City, California

Logged By: Erick Escobar

Depth to Water>

Initial: None

At Completion: None



Drill Method: Solid Flight

Drill Date: 9-30-20

Drill Rig: CME 45C-1

Krazan and Associates

Hole Size: 4½ Inches

Driller: Chris Wyneken

Elevation: 15 Feet

Log of Boring B2

Project: Multi-Family Development

Project No: 042-20043

Client: AMG & Associates, LLC

Figure No.: A-2

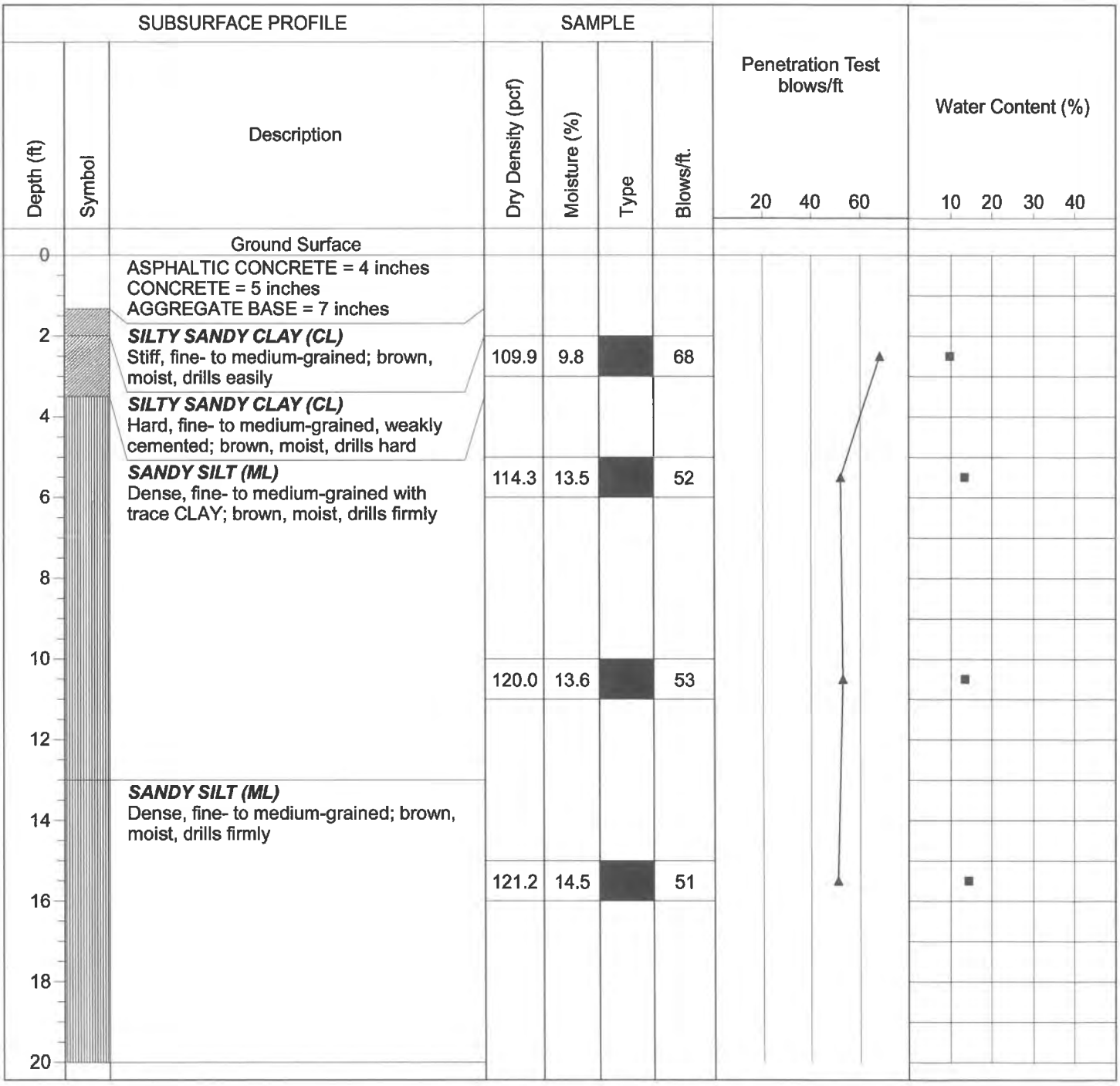
Location: 825 Drake Avenue, Marin City, California

Logged By: Erick Escobar

Depth to Water>

Initial: None

At Completion: None



Drill Method: Solid Flight

Drill Date: 9-30-20

Drill Rig: CME 45C-1

Krazan and Associates

Hole Size: 4½ Inches

Driller: Chris Wyneken

Elevation: 20 Feet

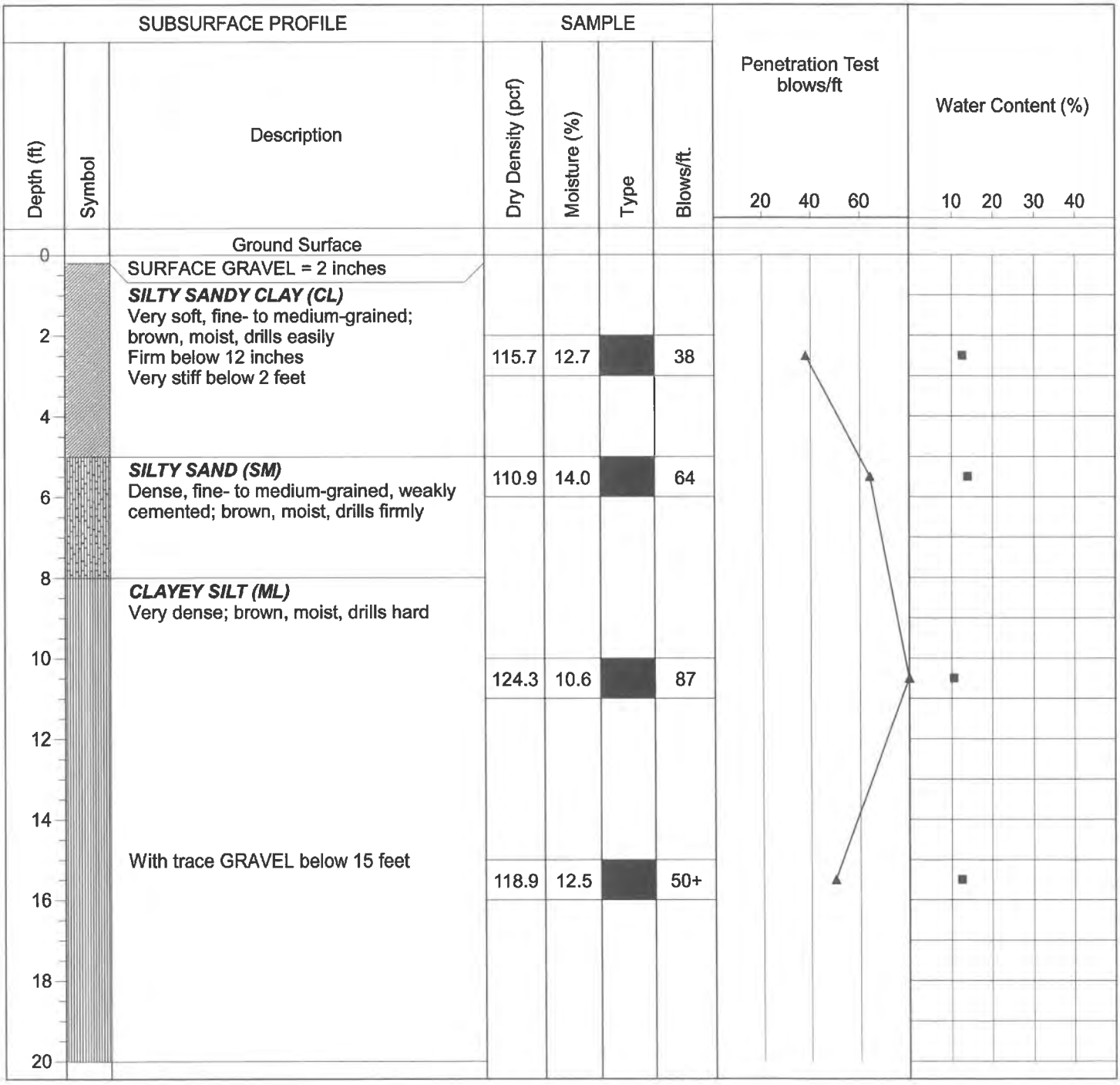
Log of Boring B3

Project: Multi-Family Development | **Project No:** 042-20043

Client: AMG & Associates, LLC | **Figure No.:** A-3

Location: 825 Drake Avenue, Marin City, California | **Logged By:** Erick Escobar

Depth to Water> | **Initial:** None | **At Completion:** None



Drill Method: Solid Flight | **Drill Date:** 9-30-20

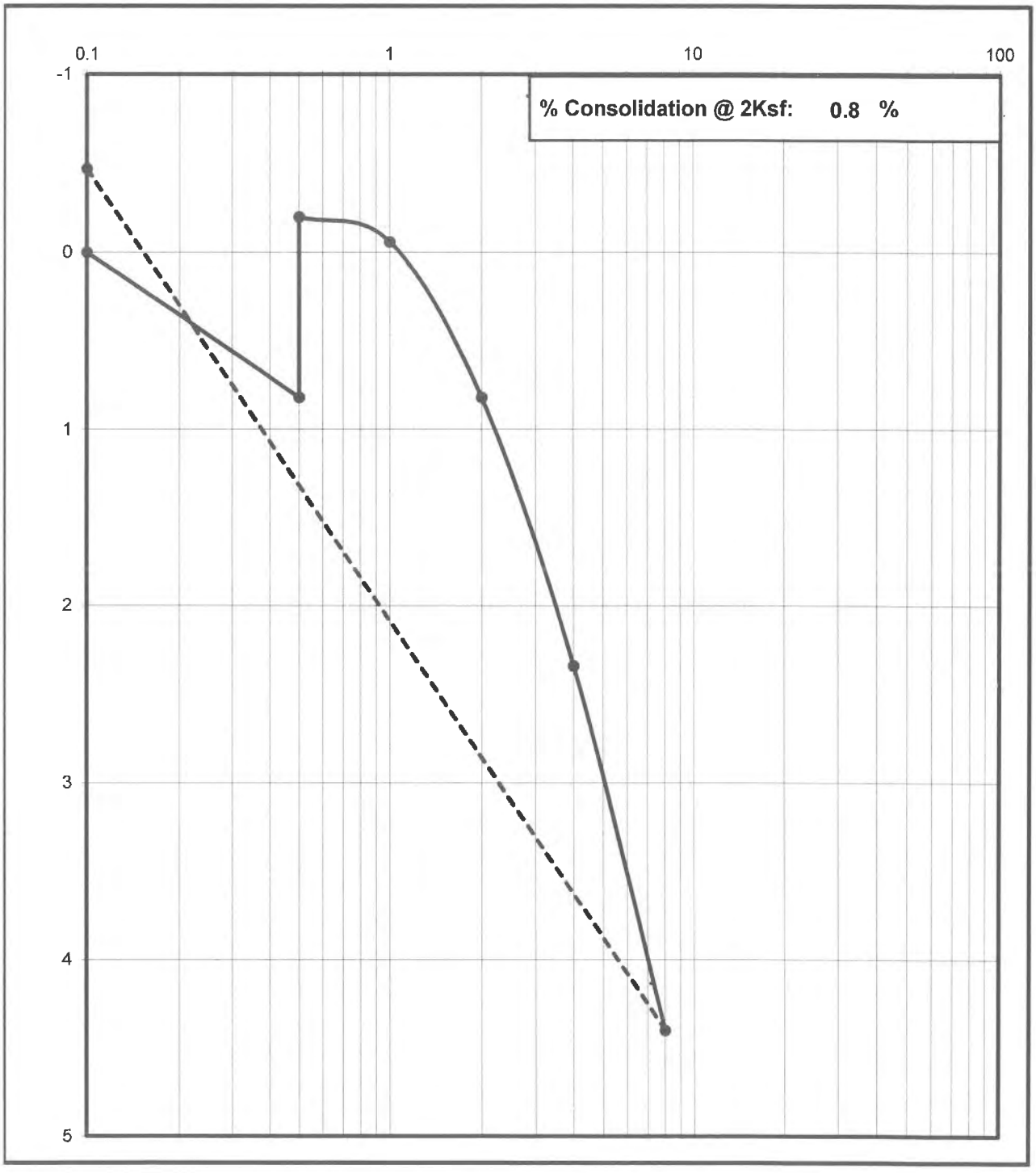
Drill Rig: CME 45C-1 | **Krazan and Associates** | **Hole Size:** 4½ Inches

Driller: Chris Wyneken | **Elevation:** 20 Feet

Sheet: 1 of 1

Consolidation Test

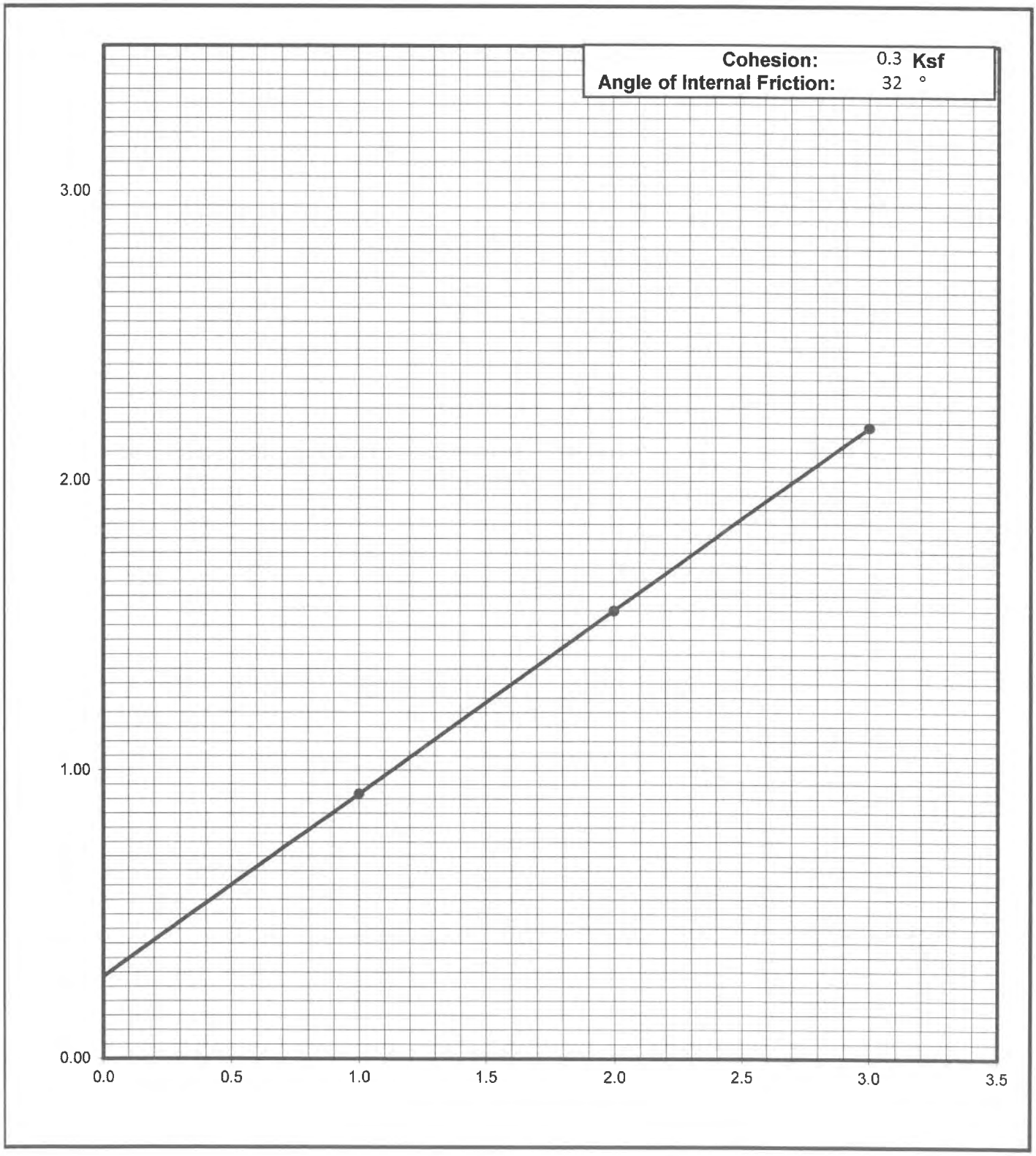
Project No	Boring No. & Depth	Date	Soil Classification
042-20043	B3 @ 2-3'	10/13/2020	CL



Krazan Testing Laboratory

Shear Strength Diagram (Direct Shear)
ASTM D - 3080 / AASHTO T - 236

Project Number	Boring No. & Depth	Soil Type	Date
042-20043	B2 @ 2-3'	CL	10/13/2020



Krazan Testing Laboratory

Grain Size Analysis

(Unified Soils Classification)

Project Name	825 Drake Avenue
Project Number	042-20043
Soil Classification	CL
Sample Number	B3 @ 2-3'

Krazan Testing Laboratory

Expansion Index Test

ASTM D - 4829

Project Number	: 042-20043
Project Name	: 825 Drake Avenue
Date	: 10/13/2020
Sample location/ Depth	: 1-3'
Sample Number	: RV#1
Soil Classification	: CL

Trial #	**1**	**2**	**3**
Weight of Soil & Mold, gms	752.5		
Weight of Mold, gms	367.6		
Weight of Soil, gms	384.9		
Wet Density, Lbs/cu.ft.	116.1		
Weight of Moisture Sample (Wet), gms	200.0		
Weight of Moisture Sample (Dry), gms	180.0		
Moisture Content, %	11.1		
Dry Density, Lbs/cu.ft.	104.5		
Specific Gravity of Soil	2.7		
Degree of Saturation, %	49.0		

Time	Inital	30 min	1 hr	6hrs	12 hrs	24 hrs
Dial Reading	0	--	--	--	--	0.0547

Expansion Index $_{measured}$ = 54.7

Expansion Index = **55**

Expansion Potential Table	
Exp. Index	Potential Exp.
0 - 20	Very Low
21 - 50	Low
51 - 90	Medium
91 - 130	High
>130	Very High

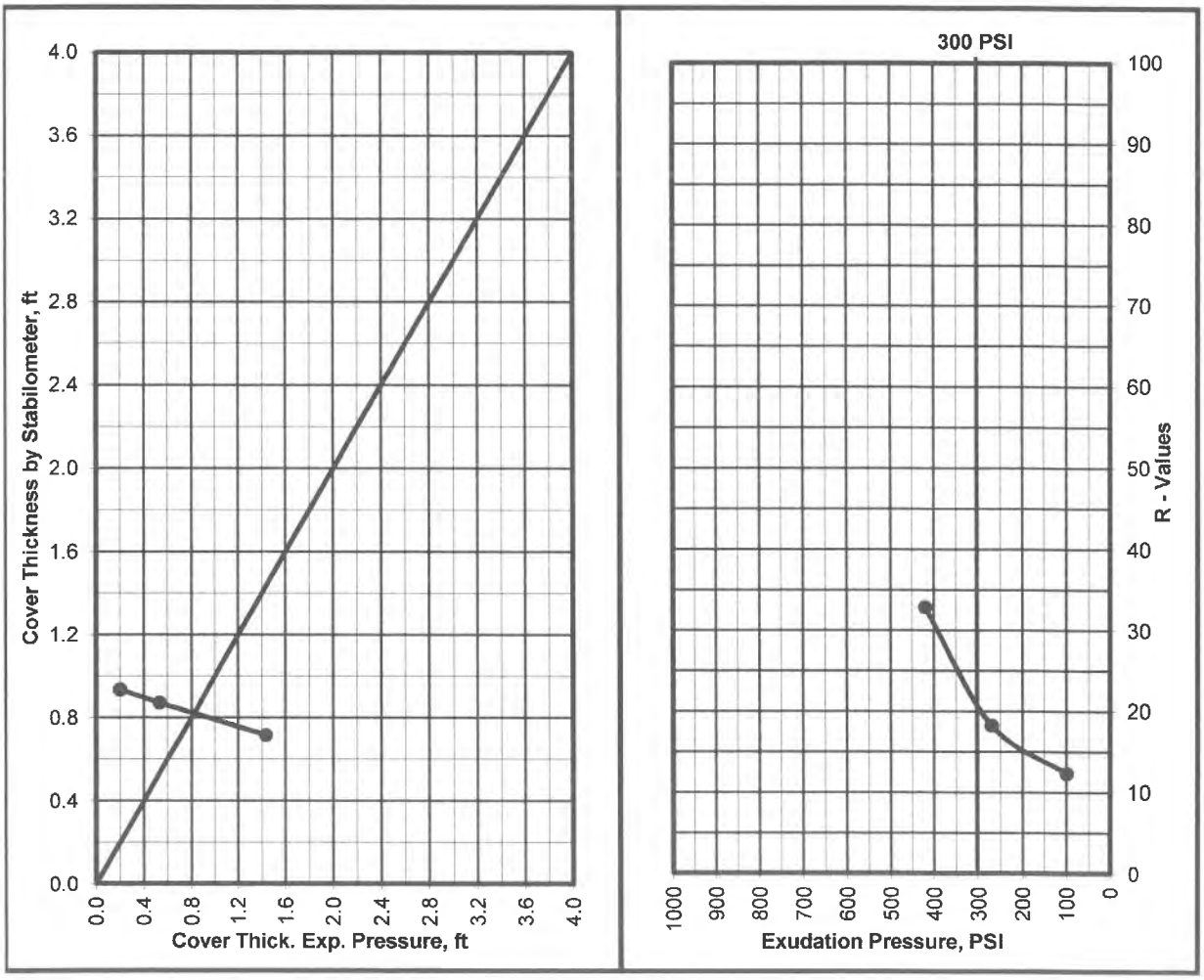
Krazan Testing Laboratory

R - VALUE TEST
ASTM D - 2844 / CAL 301

Project Number	:	042-20043
Project Name	:	825 Drake Avenue
Date	:	10/7/2020
Sample Location/Curve Number	:	RV#1
Soil Classification	:	CL

TEST	A	B	C
Percent Moisture @ Compaction, %	15.0	16.0	16.7
Dry Density, lbm/cu.ft.	116.6	114.4	113.5
Exudation Pressure, psi	420	270	100
Expansion Pressure, (Dial Reading)	43	16	6
Expansion Pressure, psf	186	69	26
Resistance Value R	33	18	12

R Value at 300 PSI Exudation Pressure	**20**
R Value by Expansion Pressure (TI =): 5	**23**



Krazan Testing Laboratory

APPENDIX B

EARTHWORK SPECIFICATIONS

GENERAL

When the text of the report conflicts with the general specifications in this appendix, the recommendations in the report have precedence.

SCOPE OF WORK: These specifications and applicable plans pertain to and include all earthwork associated with the site rough grading, including but not limited to the furnishing of all labor, tools, and equipment necessary for site clearing and grubbing, stripping, preparation of foundation materials for receiving fill, excavation, processing, placement and compaction of fill and backfill materials to the lines and grades shown on the project grading plans, and disposal of excess materials.

PERFORMANCE: The Contractor shall be responsible for the satisfactory completion of all earthwork in accordance with the project plans and specifications. This work shall be inspected and tested by a representative of Krazan and Associates, Inc., hereinafter known as the Soils Engineer and/or Testing Agency. Attainment of design grades when achieved shall be certified by the project Civil Engineer. Both the Soils Engineer and the Civil Engineer are the Owner's representatives. If the Contractor should fail to meet the technical or design requirements embodied in this document and on the applicable plans, he shall make the necessary readjustments until all work is deemed satisfactory as determined by both the Soils Engineer and the Civil Engineer. No deviation from these specifications shall be made except upon written approval of the Soils Engineer, Civil Engineer or project Architect.

No earthwork shall be performed without the physical presence or approval of the Soils Engineer. The Contractor shall notify the Soils Engineer at least 2 working days prior to the commencement of any aspect of the site earthwork.

The Contractor agrees that he shall assume sole and complete responsibility for job site conditions during the course of construction of this project, including safety of all persons and property; that this requirement shall apply continuously and not be limited to normal working hours; and that the Contractor shall defend, indemnify and hold the Owner and the Engineers harmless from any and all liability, real or alleged, in connection with the performance of work on this project, except for liability arising from the sole negligence of the Owner or the Engineers.

TECHNICAL REQUIREMENTS: All compacted materials shall be densified to a density not less than 90 percent relative compaction based on ASTM Test Method D1557 or CAL-216, as specified in the technical portion of the Soil Engineer's report. The location and frequency of field density tests shall be as determined by the Soils Engineer. The results of these tests and compliance with these specifications shall be the basis upon which satisfactory completion of work will be judged by the Soils Engineer.

SOILS AND FOUNDATION CONDITIONS: The Contractor is presumed to have visited the site and to have familiarized himself with existing site conditions and the contents of the data presented in the soil report.

The Contractor shall make his own interpretation of the data contained in said report, and the Contractor shall not be relieved of liability under the Contract documents for any loss sustained as a result of any variance between conditions indicated by or deduced from said report and the actual conditions encountered during the progress of the work.

DUST CONTROL: The work includes dust control as required for the alleviation or prevention of any dust nuisance on or about the site or the borrow area, or off-site if caused by the Contractor's operation either during the performance of the earthwork or resulting from the conditions in which the Contractor leaves the site. The Contractor shall assume all liability, including court costs of codefendants, for all claims related to dust or windblown materials attributable to his work.

SITE PREPARATION

Site preparation shall consist of site clearing and grubbing and the preparations of foundation materials for receiving fill.

CLEARING AND GRUBBING: The Contractor shall accept the site in this present condition and shall demolish and/or remove from the area of designated project earthwork all structures, both surface and subsurface, trees, brush, roots, debris, organic matter, and all other matter determined by the Soils Engineer to be deleterious or otherwise unsuitable. Such materials shall become the property of the Contractor and shall be removed from the site.

Tree root systems in proposed building areas should be removed to a minimum depth of 3 feet and to such an extent which would permit removal of all roots larger than 1 inch. Tree roots removed in parking areas may be limited to the upper 1½ feet of the ground surface. Backfill of tree root excavations should not be permitted until all exposed surfaces have been inspected and the Soils Engineer is present for the proper control of backfill placement and compaction. Burning in areas which are to receive fill materials shall not be permitted.

SUBGRADE PREPARATION: Surfaces to receive Engineered Fill, building or slab loads shall be prepared as outlined above, excavated/scarified to a depth of 12 inches, moisture-conditioned as necessary, and compacted to 90 percent relative compaction.

Loose soil areas, areas of uncertified fill, and/or areas of disturbed soils shall be moisture-conditioned as necessary and recompacted to 90 percent relative compaction. All ruts, hummocks, or other uneven surface features shall be removed by surface grading prior to placement of any fill materials. All areas which are to receive fill materials shall be approved by the Soils Engineer prior to the placement of any of the fill material.

EXCAVATION: All excavation shall be accomplished to the tolerance normally defined by the Civil Engineer as shown on the project grading plans. All over-excavation below the grades specified shall be backfilled at the Contractor's expense and shall be compacted in accordance with the applicable technical requirements.

FILL AND BACKFILL MATERIAL: No material shall be moved or compacted without the presence of the Soils Engineer. Material from the required site excavation may be utilized for construction site fills provided prior approval is given by the Soils Engineer. All materials utilized for constructing site fills shall be free from vegetation or other deleterious matter as determined by the Soils Engineer.

PLACEMENT, SPREADING AND COMPACTION: The placement and spreading of approved fill materials and the processing and compaction of approved fill and native materials shall be the responsibility of the Contractor. However, compaction of fill materials by flooding, ponding, or jetting shall not be permitted unless specifically approved by local code, as well as the Soils Engineer.

Both cut and fill areas shall be surface-compacted to the satisfaction of the Soils Engineer prior to final acceptance.

SEASONAL LIMITS: No fill material shall be placed, spread, or rolled while it is frozen or thawing or during unfavorable wet weather conditions. When the work is interrupted by heavy rains, fill operations shall not be resumed until the Soils Engineer indicates that the moisture content and density of previously placed fill are as specified.

APPENDIX C

PAVEMENT SPECIFICATIONS

1. DEFINITIONS - The term "pavement" shall include asphaltic concrete surfacing, untreated aggregate base, and aggregate subbase. The term "subgrade" is that portion of the area on which surfacing, base, or subbase is to be placed.

The term "Standard Specifications": hereinafter referred to is the 2018 Standard Specifications of the State of California, Department of Transportation, and the "Materials Manual" is the Materials Manual of Testing and Control Procedures, State of California, Department of Public Works, Division of Highways. The term "relative compaction" refers to the field density expressed as a percentage of the maximum laboratory density as defined in the applicable tests outlined in the Materials Manual.

2. SCOPE OF WORK - This portion of the work shall include all labor, materials, tools, and equipment necessary for, and reasonably incidental to the completion of the pavement shown on the plans and as herein specified, except work specifically noted as "Work Not Included."

3. PREPARATION OF THE SUBGRADE - The Contractor shall prepare the surface of the various subgrades receiving subsequent pavement courses to the lines, grades, and dimensions given on the plans. The upper 12 inches of the soil subgrade beneath the pavement section shall be compacted to a minimum relative compaction of 90 percent. The finished subgrades shall be tested and approved by the Soils Engineer prior to the placement of additional pavement courses.

4. UNTREATED AGGREGATE BASE - The aggregate base material shall be spread and compacted on the prepared subgrade in conformity with the lines, grades, and dimensions shown on the plans. The aggregate base material shall conform to the requirements of Section 26 of the Standard Specifications for Class 2 material, 1½ inches maximum size. The aggregate base material shall be spread and compacted in accordance with Section 26 of the Standard Specifications. The aggregate base material shall be spread in layers not exceeding 6 inches and each layer of aggregate material course shall be tested and approved by the Soils Engineer prior to the placement of successive layers. The aggregate base material shall be compacted to a minimum relative compaction of 95 percent.

5. AGGREGATE SUBBASE - The aggregate subbase shall be spread and compacted on the prepared subgrade in conformity with the lines, grades, and dimensions shown on the plans. The aggregate subbase material shall conform to the requirements of Section 25 of the Standard Specifications for Class 2 material. The aggregate subbase material shall be compacted to a minimum relative compaction of 95 percent, and it shall be spread and compacted in accordance with Section 25 of the Standard Specifications. Each layer of aggregate subbase shall be tested and approved by the Soils Engineer prior to the placement of successive layers.

6. ASPHALTIC CONCRETE SURFACING - Asphaltic concrete surfacing shall consist of a mixture of mineral aggregate and paving grade asphalt, mixed at a central mixing plant and spread and compacted on a prepared base in conformity with the lines, grades and dimensions shown on the plans. The viscosity grade of the asphalt shall be PG 64-10. The mineral aggregate shall be Type B, ½ inch maximum size, medium grading and shall conform to the requirements set forth in Section 39. The drying, proportioning and mixing of the materials shall conform to Section 39.

The prime coat, spreading and compacting equipment and spreading and compacting mixture shall conform to the applicable chapters of Section 39, with the exception that no surface course shall be placed when the atmospheric temperature is below 50° F. The surfacing shall be rolled with a combination of steel wheel and pneumatic rollers, as described in Section 39-6. The surface course shall be placed with an approved self-propelled mechanical spreading and finishing machine.

7. FOG SEAL COAT - The fog seal (mixing type asphaltic emulsion) shall conform to and be applied in accordance with the requirements of Section 37.

APPENDIX G

ARBORIST SURVEY REPORT

Arborist Survey Report

825 DRAKE AVENUE
SAUSALITO, MARIN COUNTY, CALIFORNIA

Prepared For:

AMG & Associates, LLC
16633 Ventura Boulevard
Suite 10104
Encino, CA 91436

Contact: Gene Broussard
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Prepared By:

WRA, Inc.
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Contacts:
Phil Greer, Principal
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Gavin Albertoli, Project Manager
albertoli@wra-ca.com

Date:
March 2020

WRA Project No:
29353

ENVIRONMENTAL CONSULTANTS

2169-G East Francisco Blvd., San Rafael, CA 94901 (415) 454-8868 tel (415) 454-0129 fax info@wra-ca.com www.wra-ca.com

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APPENDICES

Appendix A Tree Survey Table
Appendix B Tree Survey Map
Appendix C Representative Photographs

1.0 INTRODUCTION

On January 15, 2020, WRA, Inc. (WRA) conducted an arborist survey at the site of a proposed multi-family residential housing project (Project) located at 825 Drake Avenue (APN: 052-112-03), in Sausalito, unincorporated Marin County (County), California (Study Area). The survey was conducted by ISA-Certified Arborist Gavin Albertoli (ISA #WE-12027A). The purpose of the survey was to identify and document the presence of "Protected Trees" and "Heritage Trees" as defined by Chapter 22.27, "Native Tree Preservation and Protection" of the Marin County Municipal Code (Tree Ordinance) within the Study Area.

GPS locations for all protected or heritage trees surveyed within the Study Area and information regarding the species, size in diameter at breast height (DBH; as measured 4.5 feet above grade), estimated crown radius, estimated height, health, condition, and structure ratings were collected and are included in this report. A table with all relevant information pertaining to surveyed trees is provided in Appendix A. A tree survey location map is provided in Appendix B. Representative photographs are provided in Appendix C.

1.1 Study Area Description

The Study Area is composed of one approximately 1.01-acre improved parcel located at 825 Drake Avenue, approximately 0.2 air mile west of US Highway 101. The Study Area consists of mostly developed areas including a paved parking lot, paved walkways, a semi-permanent church structure, a storage shed, and surrounding landscaped areas. Planted native and non-native landscape trees border the majority of the Study Area. Existing access to the Study Area is via a paved driveway that is located in the southern portion of the Study Area adjacent to Drake Avenue.

1.2 Regulatory Background

Marin County Tree Ordinance

Marin County recognizes the value and beneficial functions that trees provide the residents of the County. Chapter 22.27, "Native Tree Protection and Preservation" of the County's Municipal Code (Tree Ordinance) regulates the protection of certain trees on improved and unimproved properties in non-agricultural unincorporated areas of the County. The Tree Ordinance protects both "protected trees" and "heritage trees" as defined below.

- Protected trees are defined as native oaks (*Quercus* spp.), willows (*Salix* spp.), Sargent cypress (*Hesperocyparis sargentii* [*Cupressus s.*]), and madrone (*Arbutus menziesii*) with a minimum diameter at breast height (DBH; measured 4.5 feet above grade) of 6 inches, and most other native tree species, including Douglas fir (*Pseudotsuga menziesii*) and California bay (*Umbellularia californica*) with a minimum DBH of 10 inches.
- Heritage trees are defined as native oaks, willows, Sargent cypress, and madrone with a minimum DBH of 18 inches, and most other native tree species including California bay with a minimum DBH of 30 inches.

A tree removal permit through the County's Community Development Agency Planning Division is required anytime two or more protected trees are being removed from a developed lot in a 12-month period; the tree being removed qualifies as a heritage tree; a protected tree or heritage tree is located in a stream conservation area or a wetland conservation area, or a protected tree is being removed from a vacant lot. Exemptions not requiring a permit include the removal of any protected or heritage tree that meets at least one of the following criteria for removal:

- The general health of the tree is so poor due to disease, damage, or age that efforts to ensure its long-term health and survival are unlikely to be successful;
- The tree is infected by a pathogen or attacked by insects that threaten surrounding trees as determined by an arborist report or other qualified professional;
- The tree is a potential public health and safety hazard due to the risk of its falling and its structural instability cannot be remedied.
- The tree is a public nuisance by causing damage to improvements, such as building foundations, retaining walls, roadways/driveway's, patios, sidewalks and decks, or interfering with the operation, repair, or maintenance of public utilities;
- The tree has been identified by a Fire Inspector as a fire hazard;
- The tree was planted for a commercial tree enterprise, such as Christmas tree farms or orchards;
- Prohibiting the removal of the tree will conflict with CC&R's which existed at the time this chapter was adopted;
- The tree is located on land which is zoned for agriculture and that is being used for commercial agricultural purposes;
- The tree removal is by a public agency to provide for the routine management and maintenance of public land or to construct a fuel break;
- The tree removal is on a developed lot and: (1) does not exceed two protected trees within a one-year timeframe, (2) does not entail the removal of any heritage trees, and (3) does not entail the removal of any protected or heritage trees within a stream conservation area or a wetland conservation area.

Tree replacement may be required as a condition of approval of the tree removal permit. Establishment and maintenance replacement trees at a minimum ratio of two new, appropriately sized and installed trees for each tree removed. In the event that tree planting on the site is not feasible or appropriate, the Director may require in lieu of planting on the specific property, the payment of money in the amount of $500.00 per replacement tree to be deposited into the Tree Preservation Fund managed by the Marin County Parks and Open Space Department for planting, maintenance, and management of trees and other vegetation.

2.0 METHODS

On January 15, 2020 the Study Area was traversed on foot to inventory all trees located within the Study Area. WRA's ISA-Certified Arborists surveyed the area and recorded relevant tree information for each surveyed tree.

2.1 Tree Inventory

Locations of surveyed trees within the Study Area were recorded using a handheld GPS unit with sub-meter accuracy. Each surveyed tree was given an aluminum tree tag with a unique identification number. DBH was calculated for surveyed trees by measuring the trunk diameter at 4.5 ft. above grade. DBH for trees that split into multiple trunks at or just below 4.5 feet were measured at the narrowest point beneath the split. DBH for multi-stem trees that split into multiple trunks at or near ground level were calculated by measuring each individual trunk and calculating the sum total of trunk diameters. In cases where multi-trunk trees had more than five main trunks, only the five largest trunks were measured. In cases where an irregular buttress or bulge occurred at 4.5 feet above ground measurements were taken above or below the irregular feature in order

to best represent the size of the tree. A complete list of all surveyed trees is provided in Appendix A.

2.2 Tree Assessment

General notes on the condition of trees were taken, including health, structure, and overall condition. Assessment of the health, structure, and overall condition of each tree was conducted according to the narratives listed in Table 1.

Table 1. Rating Narratives for Tree Assessment

Health	
Good	Tree is free from symptoms of disease and stress.
Fair	Tree shows some symptoms of disease or stress including twig and small branch dieback, evidence of fungal / parasitic infection, thinning of crown, or poor leaf color.
Poor	Tree shows symptoms of severe decline.
Structure	
Good	Tree is free from major structural defects.
Fair	Tree shows some structural defects in branches but overall structure is stable.
Poor	Tree shows structural failure of a major branch or co-dominant trunk.
General Condition	
Good	Tree shows condition of foliage, bark, and overall structure characteristic of the species and lacking obvious defect, or disease.
Fair	Tree shows condition of foliage, bark, and overall structure characteristic of the species with some evidence of stress, defect, or disease.
Poor	Tree shows condition of foliage, bark, and overall structure uncharacteristic of the species with obvious evidence of stress, defect, or disease.

2.3 Tree Impact Assessment

Potential impacts to all trees located within the Study Area were analyzed in GIS. The most recent project footprint was overlaid with tree survey data to determine which trees will potentially be impacted by removal (Appendix B). Any tree within or directly adjacent to the Project footprint was considered to be a potential removal impact. Potential tree impacts requiring a permit from the County include removal of any protected tree or heritage tree. The results of the impacts analysis are provided below and shown in Appendix A.

3.0 RESULTS

3.1 Tree Inventory

A total of 27 trees were identified within the Study Area. Tree species surveyed within the Study Area include coast redwood (*Sequoia sempervirens*), Monterey cypress (*Hesperocyparis*

macrocarpa), Monterey pine (*Pinus radiata*), blue gum (*Eucalyptus globulus*), silver wattle (*Acacia dealbata*), and blackwood acacia (*Acacia melanoxylon*). Only one of the trees surveyed is considered a heritage tree with the remaining 26 trees having no protection status per the Tree Ordinance.

The single heritage tree (Tree #930) within the Study Area is a 53-inch DBH, single trunk, coast redwood. The heritage tree is located in the southern portion of the Study Area approximately 30 feet north of Drake Avenue. A complete list of all trees surveyed is presented in Appendix A. The GPS locations of surveyed trees are shown in Appendix B.

3.2 Tree Assessment

The overall condition, health, and structure of trees inventoried during this assessment ranged from poor to good, with most trees ranking fair in all three categories. Twenty-two (22) of the trees surveyed within the Study Area ranked fair in general condition with most trees displaying little to no signs of maladies or decline in vigor. Eighty-five (85) percent of the trees ranked fair in health with 15 percent ranking good, further indicating the large quantity of visibly healthy trees surveyed within the Study Area. The majority of the trees surveyed ranked fair in structure, but four of the trees surveyed ranked poor mostly due to having poor growth forms. Trees that received a poor structure rating had excessive, uncorrected leans or other structural defects. Table 2 below summarizes the assessment results for all trees surveyed.

Table 2. Tree Assessment Results Summary

Criteria Assessed/Rating	Condition	Health	Structure
Good	5 (19%)	4 (15%)	2 (7%)
Fair	22 (81%)	23 (85%)	21 (78%)
Poor	0 (0%)	0 (0%)	4 (15%)

3.3 Tree Impact Assessment

Seven (7) trees have been identified as potentially needing to be removed to accommodate the proposed Project. One (1) of the trees identified for potential removal is considered a heritage tree per the Tree Ordinance. The remaining six trees identified for potential removal are not considered protected or heritage trees.

Potential permit, mitigation, and tree protection requirements as required by the Tree Ordinance are provided below.

4.0 SUMMARY AND RECOMMENDATIONS

A tree removal permit is required anytime two or more protected trees are being removed from a developed lot in a 12-month period, any tree being removed qualifies as a heritage tree, a protected tree or heritage tree is located in a stream conservation area or a wetland conservation area, or a protected tree is being removed from a vacant lot. Application requirements, public notification procedure, permit review, conditions of approval, and potential mitigation for removals

are defined by Section 22.27 of the County's Municipal Code. The County's Community Development Agency Director may attach reasonable conditions to the approval of a permit that could include one or more of the following conditions:

- Establishment and maintenance of replacement trees in conformance with the countywide plan policies, the County's landscaping objectives, the single-family residential guidelines, and/or the vegetation management requirements of the Marin County Fire Department or local fire protection district, as applicable.
- Replacement of trees at a ratio of up to three new appropriately sized and installed trees for each tree designated to be removed.
- For large properties, a management plan which designates areas of the property for preservation of stands of trees or saplings and replacement plantings as required.
- Removal of invasive exotic species.
- Posting of a bond to cover the cost of an inspection to ensure success of measures escribed above.

As described above, the Project will potentially remove seven trees including six non-protected trees and one heritage tree. Only the removal of the single heritage tree will require a permit from the County's Community Development Agency Planning Division. Replacement tree plantings or payment of in-lieu fees may be required as a condition of approval.

In order to avoid and minimize damage to existing trees which are not proposed for direct impact by project activities, the following measures should be implemented during construction:

- All construction activity (grading, filling, paving, landscaping etc.) shall respect the root protection zone (RPZ) around all trees within the vicinity of the project area that are to be preserved. The RPZ should be a distance of 1.0 times the dripline radius measured from the trunk of the tree. Exception to this standard could be considered on a case-by-case basis, provided that it is demonstrated that an encroachment into the RPZ will not affect the root system or the health of the tree, and is authorized by an ISA-Certified Arborist or comparable specialist.
- Temporary protective fencing shall be installed around the dripline of existing trees prior to commencement of any construction activity conducted within 25' of the tree canopy. The fence shall be clearly marked to prevent inadvertent encroachment by heavy machinery.
- Drainage will not be allowed to pond around the base of any tree.
- An ISA-Certified Arborist or tree specialist shall be retained to perform any necessary pruning of trees during construction activity.
- Should any utility lines encroach within the tree protection zone, a single, shared utility conduit shall be used where possible to avoid negative impact to trees.
- Roots exposed, as a result of construction activities shall be covered with wet burlap to avoid desiccation, and should be buried as soon as practicable.
- Construction materials or heavy equipment shall not be stored within the root protection zone of preserved trees.
- Only an ISA-Certified Arborist or comparable specialist will make specific recommendations as to where any existing trees can safely tolerate some level of fill within the drip line.
- Trenching within RPZ shall be done under the field supervision of an ISA-Certified Arborist and shall be hand dug as much as possible in addition to using auger or drill.

- Construction materials shall be properly stored away from existing trees to avoid spillage or damage to trees.

5.0 REFERENCES

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APPENDIX A

TREE SURVEY TABLE

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Appendix A. 825 Drake Ave Tree Survey Table

Tag ID	Species	Common Name	Multi-stem	Diameter	Diameter	Diameter	Diameter	Diameter	Total Diameter (inches)	Ordinance Status	Potential Impact	Dripline (feet)	Height (feet)	Condition	Health	Structure
930	*Sequoia sempervirens*	coast redwood	No	53.0	0.0	0.0	0.0	0.0	53.0	heritage tree	Removal	20	75	Good	Good	Fair
931	*Acacia melanoxylon*	black wood acacia	Yes	10.5	8.0	0.0	0.0	0.0	18.5	non-protected	Removal	10	25	Fair	Fair	Fair
932	*Acacia melanoxylon*	black wood acacia	No	19.5	0.0	0.0	0.0	0.0	19.5	non-protected	Removal	10	30	Fair	Fair	Fair
933	*Acacia melanoxylon*	black wood acacia	Yes	10.0	3.2	5.0	0.0	0.0	18.2	non-protected	No impact	10	25	Fair	Fair	Fair
934	*Acacia melanoxylon*	black wood acacia	Yes	9.0	4.0	0.0	0.0	0.0	13.0	non-protected	No impact	10	20	Fair	Fair	Fair
935	*Acacia melanoxylon*	black wood acacia	Yes	10.6	8.0	0.0	0.0	0.0	18.6	non-protected	No impact	10	25	Fair	Fair	Fair
936	*Quercus agrifolia*	coast live oak	No	5.8	0.0	0.0	0.0	0.0	5.8	non-protected	No impact	10	15	Fair	Fair	Poor
937	*Pinus radiata*	Monterey pine	No	19.5	0.0	0.0	0.0	0.0	19.5	non-protected	No impact	15	60	Fair	Fair	Fair
938	*Eucalyptus globulus*	Blue gum	No	23.2	0.0	0.0	0.0	0.0	23.2	non-protected	Removal	20	65	Fair	Fair	Fair
939	*Pinus radiata*	Monterey pine	Yes	4.0	4.0	2.2	0.0	0.0	10.2	non-protected	No impact	8	20	Fair	Fair	Fair
940	*Acacia dealbata*	silver wattle	Yes	8.5	7.0	0.0	0.0	0.0	15.5	non-protected	No impact	15	25	Fair	Fair	Fair
941	*Acacia dealbata*	silver wattle	Yes	6.0	8.2	0.0	0.0	0.0	14.2	non-protected	Removal	15	25	Fair	Fair	Fair
942	*Acacia dealbata*	silver wattle	Yes	9.0	6.0	2.5	3.0	2.0	22.5	non-protected	No impact	10	30	Fair	Fair	Fair
943	*Acacia dealbata*	silver wattle	Yes	11.5	7.6	7.5	6.0	5.5	38.1	non-protected	Removal	20	30	Fair	Fair	Fair
944	*Acacia dealbata*	silver wattle	Yes	8.2	6.5	4.0	2.5	2.5	23.7	non-protected	No impact	15	30	Fair	Fair	Fair
945	*Pinus radiata*	Monterey pine	No	8.0	0.0	0.0	0.0	0.0	8.0	non-protected	No impact	10	25	Fair	Fair	Fair
946	*Acacia melanoxylon*	black wood acacia	Yes	5.0	3.8	2.0	0.0	0.0	10.8	non-protected	No impact	10	25	Fair	Fair	Fair
947	*Hesperocyparis macrocarpa*	Monterey cypress	No	40.5	0.0	0.0	0.0	0.0	40.5	non-protected	Removal	25	60	Good	Good	Fair
948	*Hesperocyparis macrocarpa*	Monterey cypress	No	29.5	0.0	0.0	0.0	0.0	29.5	non-protected	No impact	20	50	Good	Fair	Fair
949	*Hesperocyparis macrocarpa*	Monterey cypress	No	28.0	0.0	0.0	0.0	0.0	28.0	non-protected	No impact	20	50	Fair	Fair	Fair
950	*Acacia melanoxylon*	black wood acacia	Yes	8.5	7.0	5.5	0.0	0.0	21.0	non-protected	No impact	8	15	Fair	Fair	Poor
951	*Hesperocyparis macrocarpa*	Monterey cypress	Yes	24.5	18.0	0.0	0.0	0.0	42.5	non-protected	No impact	20	55	Good	Good	Good
952	*Pinus radiata*	Monterey pine	No	18.0	0.0	0.0	0.0	0.0	18.0	non-protected	No impact	10	50	Fair	Fair	Fair
953	*Hesperocyparis macrocarpa*	Monterey cypress	No	22.0	0.0	0.0	0.0	0.0	22.0	non-protected	No impact	15	50	Fair	Fair	Poor
954	*Hesperocyparis macrocarpa*	Monterey cypress	Yes	17.0	10.4	8.0	6.0	5.5	46.9	non-protected	No impact	15	50	Fair	Fair	Poor
955	*Hesperocyparis macrocarpa*	Monterey cypress	No	5.0	0.0	0.0	0.0	0.0	5.0	non-protected	No impact	10	20	Fair	Fair	Fair
956	*Acacia melanoxylon*	black wood acacia	No	13.0	10.5	0.0	0.0	0.0	23.5	non-protected	No impact	20	25	Good	Good	Good

APPENDIX B

TREE SURVEY MAP

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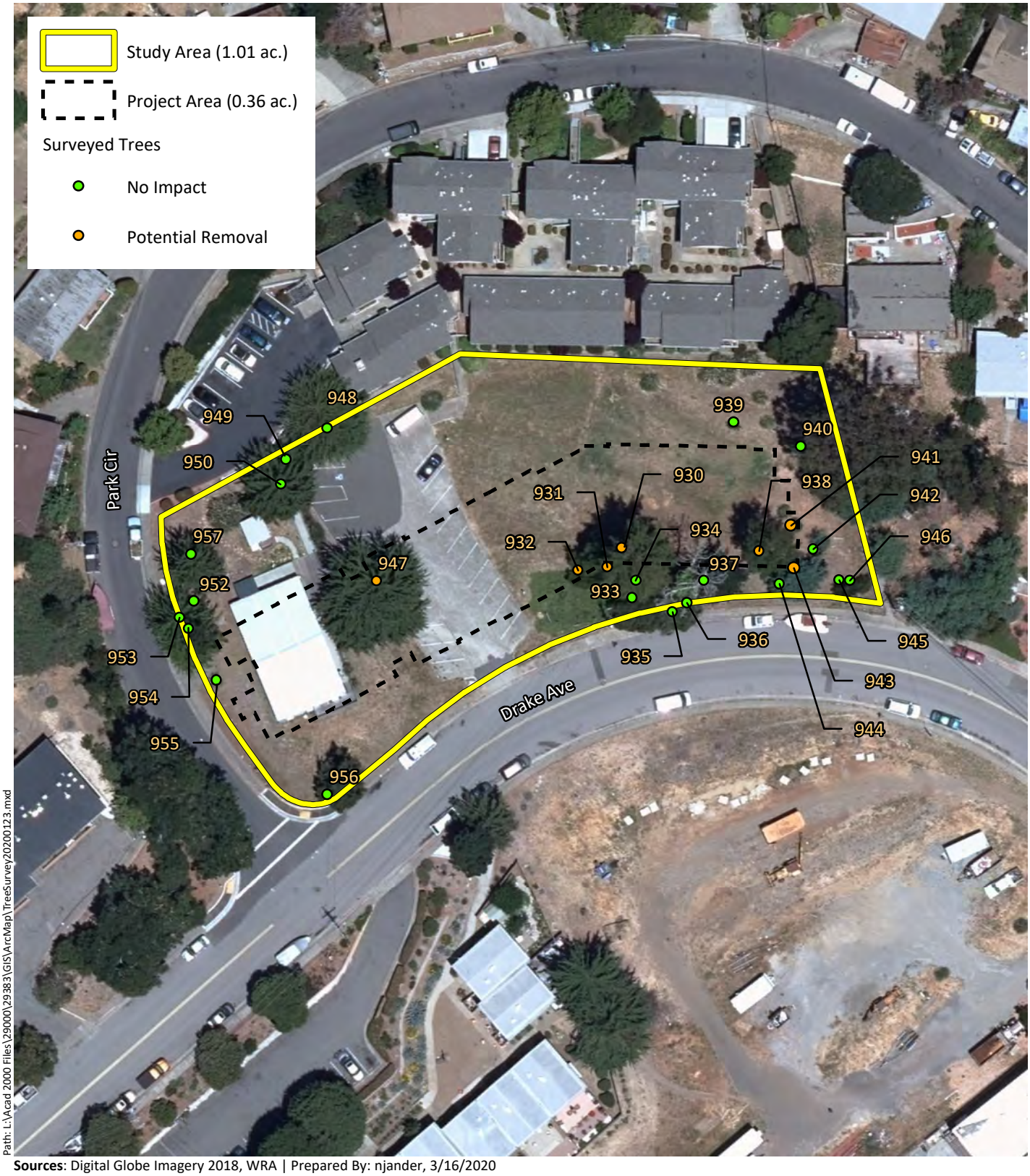

Path: L:\Acad 2000 Files\29000\29383\GIS\ArcMap\TreeSurvey20200123.mxd

Sources: Digital Globe Imagery 2018, WRA | Prepared By: njander, 3/16/2020

Figure 1. Trees in the Study Area

825 Drake Avenue
Marin County, CA

0 50 100 Feet

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APPENDIX C

REPRESENTATIVE PHOTOGRAPHS

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Photograph 1. Tree #930, a 53.0” DBH coast redwood (*Sequoia sempervirens*) heritage tree in the southern portion of the Study Area.

Photograph 2. Tree #947, a 40.5” DBH Monterey cypress (*Hesperocyparis macrocarpa*) non-protected tree in the central portion of the Study Area.

Photograph 3. Tree #'s 935 and 936 in the northern portion of the Study Area. Both trees are considered non-protected trees under the Marin County Tree Ordinance.

Photograph 4. Tree #'s 953 and 954 in the western portion of the Study Area. Both trees are considered non-protected trees under the Marin County Tree Ordinance.

Photograph 5. Tree #946, a 23.5” DBH blackwood acacia (*Acacia Melanoxylon*) non-protected tree in the south western portion of the Study Area.

APPENDIX H

ADDITIONAL SOURCES

Appendix H Contents:

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AirNav.com

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San Rafael, California, USA

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FAA Identifier: CA35
Lat/Long: 38-01-00.7190N 122-31-14.9140W
38-01.011983N 122-31.248567W
38.0168664,-122.5208094
(estimated)
Elevation: 5 ft. / 2 m (estimated)
Variation: 16E (1985)
From city: 3 miles N of SAN RAFAEL, CA
Time zone: UTC -8 (UTC -7 during Daylight Saving Time)
Zip code: 94903

Airport Operations

Airport use: Private use. Permission required prior to landing
Control tower: no
ARTCC: OAKLAND CENTER
FSS: OAKLAND FLIGHT SERVICE STATION
Attendance: DAYLIGHT HOURS
Wind indicator: lighted

Segmented circle: no
Lights: SS-SR
Landing fee: yes

Airport Communications

UNICOM: 122.7
WX AWOS-3P at DVO (8 nm N): 120.675 (415-897-2236)
WX AWOS-3P at O69 (15 nm N): 132.325 (707-773-1529)
WX AWOS-AV at 18CN (16 nm S): 119.925 (415-514-4209)
WX ASOS at APC (16 nm NE): PHONE 707-252-7916

Nearby radio navigation aids

VOR radial/distance	VOR name	Freq	Var
SAUr344/9.7	SAUSALITO VOR/DME	116.20	17E
SGDr199/12.0	SCAGGS ISLAND VORTAC	112.10	17E
PYEr086/16.8	POINT REYES VOR/DME	113.70	17E
OAKr304/22.4	OAKLAND VOR/DME	116.80	17E
CCRr249/22.5	CONCORD VOR/DME	117.00	17E
SFOr327/24.8	SAN FRANCISCO VOR/DME	115.80	17E
OSIr326/39.1	WOODSIDE VOR/DME	113.90	17E

Airport Services

Fuel available: 100LL JET-A
A:FOR FUEL CALL 415-472-7700.
Airframe service: NONE
Powerplant service: NONE
Bottled oxygen: NONE
Bulk oxygen: NONE

Runway Information

Runway 4/22

Dimensions: 2700 x 30 ft. / 823 x 9 m
Surface: asphalt, in fair condition
Weight bearing capacity: Single wheel: 7.0

Road maps at: MapQuest Bing Google

Aerial photo

WARNING: Photo may not be current or correct

Taken mid March 2008

Do you have a better or more recent aerial photo of San Rafael Airport that you would like to share? If so, please **send us your photo**.

Sectional chart

	RUNWAY 4	RUNWAY 22
Runway edge lights:	low intensity FAA APPROVED STD FIXTURES & THR LGTS; EACH SIDE THR.	
Traffic pattern:	left	right
Markings:	NSTD, in fair condition	
Runway end identifier lights:	no	no
Obstructions:	300 ft. hill, 4500 ft. from runway, 14:1 slope to clear	40 ft. pole, lighted, 1150 ft. from runway, 24:1 slope to clear

Airport Ownership and Management from official FAA records

Ownership: Privately-owned
Owner: SAN RAFAEL AIRPORT, LLC
2173 D FRANCISCO BLVD
SAN RAFAEL, CA 94901
Phone 415-472-7700
Manager: BOB HERBST
2173 D FRANCISCO BLVD
SAN RAFAEL, CA 94901
Phone 415-472-7700
EMAIL: RHERBST@JHSPROPERTIES.NET

Airport Operational Statistics

Aircraft based on the field: 100
Single engine airplanes: 90
Multi engine airplanes: 5
Jet airplanes: 5

Aircraft operations: avg 25/day *
89% local general aviation
11% transient general aviation
* for 12-month period ending 26 July 1984

Additional Remarks

- FOR CD CTC OAKLAND ARTCC AT 510-745-3380.

Instrument Procedures

There are no published instrument procedures at CA35.

Some nearby airports with instrument procedures:

Airport distance calculator

Flying to San Rafael Airport? Find the distance to fly.

From to CA35

CALCULATE DISTANCE

Sunrise and sunset

Times for 26-Jan-2023

	Local (UTC-8)	Zulu (UTC)
Morning civil twilight	06:52	14:52
Sunrise	07:20	15:20
Sunset	17:25	01:25
Evening civil twilight	17:53	01:53

Current date and time

Zulu (UTC)	26-Jan-2023 22:51:05
Local (UTC-8)	26-Jan-2023 14:51:05

METAR

KDVO 8nm N	262235Z AUTO 18006KT 10SM CLR 18/05 A3039 RMK AO2
KO69 15nm N	262235Z AUTO 15005KT 10SM CLR 17/04 A3040 RMK A01
KAPC 16nm NE	262154Z 10012KT 10SM CLR 18/06 A3038 RMK AO2 SLP279 T01830056

TAF

KDVO - Gnoss Field Airport (8 nm N)
O69 - Petaluma Municipal Airport (15 nm N)
KAPC - Napa County Airport (16 nm NE)
KCCR - Buchanan Field Airport (22 nm E)
KOAK - Metro Oakland International Airport (23 nm SE)

KAPC 16nm NE 261737Z 2618/2718 09007KT P6SM SKC WS010/04030KT FM261900 08009KT P6SM SKC FM270100 VRB03KT P6SM FEW250

NOTAMs

Click for the latest **NOTAMs**
NOTAMs are issued by the DoD/FAA and will open in a separate window not controlled by AirNav.

FBO, Fuel Providers, and Aircraft Ground Support

Business Name	Contact	Services / Description	Fuel Prices	Comments
San Rafael Airport Management Office	415-472-7700 [web site] [email]	Airport management, Aviation fuel, Hangar leasing / sales More info about San Rafael Airport Management Office	independent 100LL Jet A SS $6.75 $6.65 Updated 21-Sep-2022 SS=Self service UPDATE PRICES	not yet rated write

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If your business provides an interesting product or service to pilots, flight crews, aircraft, or users of the San Rafael Airport, you should consider listing it here. To start the listing process, click on the button below

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Other Pages about San Rafael Airport

ADD A LINK

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Jurisdiction	VERY LOW INCOME (<50% of Area Median Income)	LOW INCOME (50-80% of Area Median Income)	MODERATE INCOME (80-120% of Area Median Income)	ABOVE MODERATE INCOME (>120% of Area Median Income)	TOTAL
MARIN COUNTY					
Belvedere	49	28	23	60	160
Corte Madera	213	123	108	281	725
Fairfax	149	86	71	184	490
Larkspur	291	168	145	375	979
Mill Valley	262	151	126	326	865
Novato	570	328	332	860	2,090
Ross	34	20	16	41	111
San Anselmo	253	145	121	314	833
San Rafael	857	492	521	1,350	3,220
Sausalito	200	115	114	295	724
Tiburon	193	110	93	243	639
Unincorporated Marin	1,100	634	512	1,323	3,569
NAPA COUNTY					
American Canyon*	169	109	95	249	622
Calistoga	31	19	19	50	119
Napa*	770	444	405	1,050	2,669
St. Helena*	104	59	26	67	256
Unincorporated Napa*	45	16	14	31	106
Yountville	19	11	12	30	72
SAN FRANCISCO COUNTY					
San Francisco (city)	20,867	12,014	13,717	35,471	82,069

* These allocations reflect the transfers approved by the ABAG Executive Board on March 17, 2022.

BAY AREA AIR QUALITY MANAGEMENT DISTRICT

California Environmental Quality Act

Air Quality Guidelines

Note: This May 2017 version of the Guidelines includes revisions made to the Air District's 2010 Guidelines to address the California Supreme Court's 2015 opinion in Cal. Bldg. Indus. Ass'n vs. Bay Area Air Quality Mgmt. Dist., 62 Cal.4th 369. ***The May 2017 CEQA Guidelines update does not address outdated references, links, analytical methodologies or other technical information that may be in the Guidelines or Thresholds Justification Report. The Air District is currently working to update any outdated information in the Guidelines.*** *Please see the CEQA webpage at http://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa for status updates on the Air District's CEQA Guidelines or contact Jaclyn Winkel at jwinkel@baaqmd.gov for further information.*

May 2017

BAY AREA AIR QUALITY MANAGEMENT DISTRICT

California Environmental Quality Act

Air Quality Guidelines

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MAY 2017

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(MMT CO_2e/Yr) D-17

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BAY AREA AIR QUALITY MANAGEMENT DISTRICT

ACRONYMS AND ABBREVIATIONS

µg/m^3	micrograms per cubic meter
AB	Assembly Bill
AB 1807	Tanner Air Toxics Act
AB 2588	Air Toxics Hot Spots Information and Assessment Act of 1987
ABAG	Association of Bay Area Governments
AMS	American Meteorological Society
APS	Alternative Planning Strategy
AQP	Air Quality Plan
ARB	California Air Resources Board
ATCM	air toxics control measures
BAAQMD	Bay Area Quality Management District
BACT	Best Available Control Technology
BMPs	Best Management Practices
CCA	Community Choice Aggregation
CAAQS	California Ambient Air Quality Standards
CALINE4	California Line Source Dispersion Model
CAP	criteria air pollutants
CARE	Community Air Risk Evaluation
CAPCOA	California Air Pollution Control Officers Association
CCAA	California Clean Air Act
CCAR	California Climate Action Registry
CCR	California Code of Regulations
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CalRecycle	The California Department of Resources Recycling and Recovery (formally the California Integrated Waste Management Board)
CFC	Chlorofluorocarbon
CH_4	methane
CHAPIS	Community Health Air Pollution Information System
CO	carbon monoxide
CO Protocol	Carbon Monoxide Protocol
CO_2	Carbon dioxide
CO_2e	carbon dioxide equivalent
CRA	California Resources Agency

DOE	Department of Energy
du	dwelling units
EIR	Environmental Impact Report
EMFAC	On-Road Mobile-Source Emission Factors
EPA	U.S. Environmental Protection Agency
FAR	Floor Area Ratio
FCAA	Federal Clean Air Act
FCAAA	Federal Clean Air Act Amendments of 1990
GHG	greenhouse gas(es)
GRP	General Reporting Protocol
GVW	gross vehicle weight
GWP	global warming potential
H_2S	hydrogen sulfide
HEPA	High Efficiency Particulate Arresting (filter)
HI	Hazard Index
HRA	health risk assessment
HVAC	Heating, Ventilation, and Air Conditioning System
IPCC	Intergovernmental Panel on Climate Change
ISR	Indirect Source Review
ksf	thousand square feet
kwh	Kilowatt hour
lb/acre-day	pound per disturbed acre per day
lb/day	pounds per day
lb/kwh	pounds per kilowatt hour
LCFS	Low-Carbon Fuel Standard
LVW	loaded vehicle weight
MACT	maximum available control technology
mg	million gallons
MMT	million metric tons
mph	miles per hour
MPO	Metropolitan Planning Organizations
MT	metric tons
MTC	Metropolitan Transportation Commission
N_2O	nitrous oxide
NAAQS	National Ambient Air Quality Standards

NESHAP	national emissions standards for hazardous air pollutants
NH_3	mercaptan, ammonia
NOA	Naturally Occurring Asbestos
NOP	Notice of Preparation
NO_X	oxides of nitrogen
OEHHA	Office of Environmental Health Hazard Assessment
OPR	Governor's Office of Planning and Research
PM	particulate matter
PM_{10}	respirable particulate matter with an aerodynamic resistance diameter of 10 micrometers or less
$PM_{2.5}$	fine particulate matter with an aerodynamic resistance diameter of 2.5 micrometers or less
ppm	parts per million
PUC	Public Utilities Commission
RoadMod	Roadway Construction Emissions Model
ROG	reactive organic gases
RTP	Regional Transportation Plan
SB	Senate Bill
SCS	Sustainable Communities Strategy
SF_6	sulfur hexafluoride
SFBAAB	San Francisco Bay Area Air Basin
SIP	State Implementation Plan
SMAQMD	Sacramento Metropolitan Air Quality Management District
SO_2	sulfur dioxide
SP	Service Population
SSIM	Sustainable Systems Integration Model
TAC	toxic air contaminant
T-BACT	Toxic Best Available Control Technology
TBPs	Toxic Best Practices
tpy	tons per year
UC	University of California
URBEMIS	Urban Land Use Emissions Model
VMT	vehicle miles traveled
VT	vehicle trips
yd^3	cubic yards
yr	Year

1. INTRODUCTION

1.1. PURPOSE OF GUIDELINES

The purpose of the Bay Area Air Quality Management District (BAAQMD or District) California Environmental Quality Act (CEQA) Guidelines is to assist lead agencies in evaluating air quality impacts of projects and plans proposed in the San Francisco Bay Area Air Basin (SFBAAB). The Guidelines provides BAAQMD-recommended procedures for evaluating potential air quality impacts during the environmental review process consistent with CEQA requirements. These revised Guidelines supersede the BAAQMD's previous CEQA guidance titled *BAAQMD CEQA Guidelines: Assessing the Air Quality Impacts of Projects and Plans* (BAAQMD 1999).

Land development plans and projects have the potential to generate harmful air pollutants that degrade air quality and increase local exposure. The Guidelines contain instructions on how to evaluate, measure, and mitigate air quality impacts generated from land development construction and operation activities. The Guidelines focus on criteria air pollutant, greenhouse gas (GHG), toxic air contaminant, and odor emissions generated from plans or projects.

The Guidelines are intended to help lead agencies navigate through the CEQA process. The Guidelines for implementation of the Thresholds are for information purposes only to assist local agencies. Recommendations in the Guidelines are advisory and should be followed by local governments at their own discretion. These Guidelines may inform environmental review for development projects in the Bay Area, but do not commit local governments or the Air District to any specific course of regulatory action. The Guidelines offer step-by-step procedures for a thorough environmental impact analysis of adverse air emissions due to land development in the Bay Area.

1.1.1. BAAQMD's Role in Air Quality

BAAQMD is the primary agency responsible for assuring that the National and California Ambient Air Quality Standards (NAAQS and CAAQS, respectively) are attained and maintained in the Bay Area. BAAQMD's jurisdiction includes all of Alameda, Contra Costa, Marin, Napa, San Francisco, San Mateo and Santa Clara counties, and the southern portions of Solano and Sonoma counties, as shown in Figure 1-1. The Air District's responsibilities in improving air quality in the region include: preparing plans for attaining and maintaining air quality standards; adopting and enforcing rules and regulations; issuing permits for stationary sources of air pollutants; inspecting stationary sources and responding to citizen complaints; monitoring air quality and meteorological conditions; awarding grants to reduce mobile emissions; implementing public outreach campaigns; and assisting local governments in addressing climate change.

BAAQMD takes on various roles in the CEQA process, depending on the nature of the proposed project, including:

Lead Agency – BAAQMD acts as a Lead Agency when it has the primary authority to implement or approve a project, such as when it adopts air quality plans for the region, issues stationary source permits, or adopts rules and regulations.

Responsible Agency – BAAQMD acts as a Responsible Agency when it has limited discretionary authority over a portion of a project, but does not have the primary discretionary authority of a Lead Agency. As a Responsible Agency, BAAQMD may coordinate the environmental review process with the lead agency regarding BAAQMD's permitting process, provide comments to the Lead Agency regarding potential impacts, and recommend mitigation measures.

Source: ESRI Satellite 2009

Bay Area Air Quality Management District Jurisdictional Boundaries **Figure 1-1**

Commenting Agency – BAAQMD may act as a Commenting Agency when it is not a Lead or Responsible Agency (i.e., it does not have discretionary authority over a project), but when it may have concerns about the air quality impacts of a proposed project or plan. As a Commenting Agency, BAAQMD may review environmental documents prepared for development proposals and plans in the region, such as local general plans, and provide comments to the Lead Agency regarding the adequacy of the air quality impact analysis, determination of significance, and mitigation measures proposed.

BAAQMD prepared the CEQA Guidelines to assist lead agencies in air quality analysis, as well as to promote sustainable development in the region. The CEQA Guidelines support lead agencies in analyzing air quality impacts and offers numerous mitigation measures and general plan policies to implement smart growth and transit oriented development, minimize construction emissions, and reduce population exposure to air pollution risks.

1.2. GUIDELINE COMPONENTS

The recommendations in the CEQA Guidelines should be viewed as minimum considerations for analyzing air quality impacts. Lead agencies are encouraged to tailor the air quality impact analysis to meet the needs of the local community and may conduct refined analysis that utilize more sophisticated models, more precise input data, innovative mitigation measures, and/or other features. The Guidelines contain the following sections:

Introduction – Chapter 1 provides a summary of the purpose of the Guide, and an overview of BAAQMD responsibilities.

Thresholds of Significance – Chapter 2 outlines the current thresholds or significance for determining the significance of air quality impacts.

Screening Criteria – Chapter 3 provides easy reference tables to determine if your project may have potentially significant impacts requiring a detailed analysis.

Assessing and Mitigating Impacts – Chapters 4 through 9 describe assessment methods and mitigation measures for operational-related, local community risk and hazards, local carbon monoxide (CO), odors, construction-related, and plan-level impacts.

Appendix A – Provides construction assessment tools.

Appendix B – Provides detailed air quality modeling instructions.

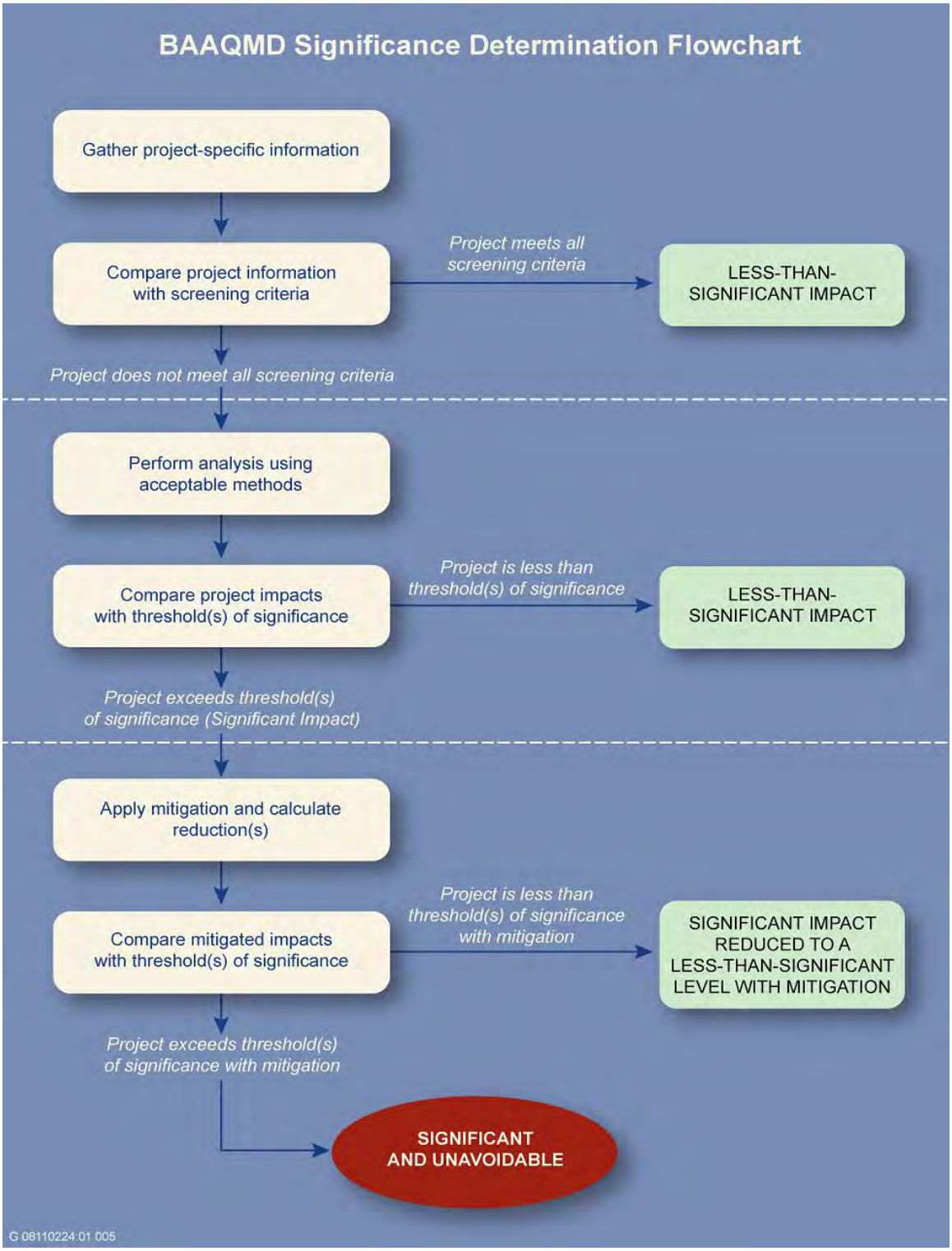
Appendix C – Outlines sample environmental setting information.

Appendix D – Contains justification statements for BAAQMD-adopted thresholds of significance.

Appendix E – Provides a glossary of terms used throughout this guide.

1.2.1. How To Use The Guidelines

Figure 2-1 illustrates general steps for evaluating a project or plan's air quality impacts. The first step is to determine whether the air quality evaluation is for a project or plan. Once identified, the project should be compared with the appropriate construction and operational screening criteria listed in Chapter 2. There are no screening criteria for plans.



General Steps for Determining Significance of Air Quality Impacts **Figure 1-2**

If the project meets the screening criteria and is consistent with the methodology used to develop the screening criteria, then its air quality impacts may be considered less than significant. Otherwise, lead agencies should evaluate potential air quality impacts of projects (and plans) as explained in Chapters 4 through 9. These Chapters describe how to analyze air quality impacts from criteria air pollutants, GHGs, local community risk and hazards, and odors associated with construction activity and operations of a project or plan.

If, after proper analysis, the project or plan's air quality impacts are found to be below the significance thresholds, then the air quality impacts may be considered less than significant. If not, the Lead Agency should implement appropriate mitigation measures to reduce associated air quality impacts. Lead agencies are responsible for evaluating and implementing all feasible mitigation measures in their CEQA document.

The mitigated project or plan's impacts are then compared again to the significance thresholds. If a project succeeded in mitigating its adverse air quality impacts below the corresponding thresholds, air quality impacts may be considered less than significant. If a project still exceeds the thresholds, the Air District strongly encourages the lead agency to consider project alternatives that could lessen any identified significant impact, including a no project alternative in accordance with CEQA Guidelines section 15126.6(e).

1.2.2. Early Consultation

The District encourages local jurisdictions and project applicants to address air quality issues as early as possible in the project planning stage. Addressing land use and site design issues while a proposed project is still in the conceptual stage increases opportunities to incorporate project design features to minimize land use compatibility issues and air quality impacts. By the time a project enters the CEQA process, it is usually more costly and time-consuming to redesign the project to incorporate mitigation measures. Early consultation may be achieved by including a formal step in the jurisdiction's development review procedures or simply by discussing air quality concerns at the planning counter when a project proponent makes an initial contact regarding a proposed development. Regardless of the specific procedures a local jurisdiction employs, the objective should be to incorporate features into a project that minimize air quality impacts before significant resources (public and private) have been devoted to the project.

The following air quality considerations warrant particular attention during early consultation between Lead Agencies and project proponents:

1. land use and design measures to encourage alternatives to the automobile, conserve energy and reduce project emissions;
2. land use conflicts and exposure of sensitive receptors to odors, toxics and criteria pollutants; and,
3. applicable District rules, regulations and permit requirements.

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PART I: THRESHOLDS OF SIGNIFICANCE & PROJECT SCREENING

2. THRESHOLDS OF SIGNIFICANCE

The SFBAAB is currently designated as a nonattainment area for state and national ozone standards and national particulate matter ambient air quality standards. SFBAAB's nonattainment status is attributed to the region's development history. Past, present and future development projects contribute to the region's adverse air quality impacts on a cumulative basis. By its very nature, air pollution is largely a cumulative impact. No single project is sufficient in size to, by itself, result in nonattainment of ambient air quality standards. Instead, a project's individual emissions contribute to existing cumulatively significant adverse air quality impacts. If a project's contribution to the cumulative impact is considerable, then the project's impact on air quality would be considered significant.

In developing thresholds of significance for air pollutants, BAAQMD considered the emission levels for which a project's individual emissions would be cumulatively considerable. If a project exceeds the identified significance thresholds, its emissions would be cumulatively considerable, resulting in significant adverse air quality impacts to the region's existing air quality conditions. Therefore, additional analysis to assess cumulative impacts is unnecessary. The analysis to assess project-level air quality impacts should be as comprehensive and rigorous as possible.

Similar to regulated air pollutants, GHG emissions and global climate change also represent cumulative impacts. GHG emissions contribute, on a cumulative basis, to the significant adverse environmental impacts of global climate change. Climate change impacts may include an increase in extreme heat days, higher concentrations of air pollutants, sea level rise, impacts to water supply and water quality, public health impacts, impacts to ecosystems, impacts to agriculture, and other environmental impacts. No single project could generate enough GHG emissions to noticeably change the global average temperature. The combination of GHG emissions from past, present, and future projects contribute substantially to the phenomenon of global climate change and its associated environmental impacts.

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BAAQMD's approach to developing a *Threshold of Significance* for GHG emissions is to identify the emissions level for which a project would not be expected to substantially conflict with existing California legislation adopted to reduce statewide GHG emissions needed to move us towards climate stabilization. If a project would generate GHG emissions above the threshold level, it would be considered to contribute substantially to a cumulative impact, and would be considered significant. Refer to Table 2-1 for a summary of Air Quality CEQA Thresholds and to Appendix D for *Thresholds of Significance* documentation.

Table 2-1 Air Quality CEQA Thresholds of Significance*			
Pollutant	**Construction-Related**	**Operational-Related**	
Project-Level			
Criteria Air Pollutants and Precursors (Regional)	**Average Daily Emissions (lb/day)**	**Average Daily Emissions (lb/day)**	**Maximum Annual Emissions (tpy)**
ROG	54	54	10
NO_X	54	54	10
PM_{10}	82 (exhaust)	82	15
$PM_{2.5}$	54 (exhaust)	54	10
$PM_{10}/PM_{2.5}$ (fugitive dust)	Best Management Practices	None	
Local CO	None	9.0 ppm (8-hour average), 20.0 ppm (1-hour average)	
GHGs – Projects other than Stationary Sources	None	Compliance with Qualified GHG Reduction Strategy OR 1,100 MT of CO_2e/yr OR 4.6 MT CO_2e/SP/yr (residents+employees)	
GHGs –Stationary Sources	None	10,000 MT/yr	
Risk and Hazards for new sources and receptors (Individual Project)*	Same as Operational Thresholds**	Compliance with Qualified Community Risk Reduction Plan OR Increased cancer risk of >10.0 in a million Increased non-cancer risk of > 1.0 Hazard Index (Chronic or Acute) Ambient $PM_{2.5}$ increase: > 0.3 µg/m^3 annual average Zone of Influence: 1,000-foot radius from property line of source or receptor	
Risk and Hazards for new sources and receptors (Cumulative Threshold)*	Same as Operational Thresholds**	Compliance with Qualified Community Risk Reduction Plan OR Cancer: > 100 in a million (from all local sources) Non-cancer: > 10.0 Hazard Index (from all local sources) (Chronic) $PM_{2.5}$: > 0.8 µg/m^3 annual average (from all local sources) Zone of Influence: 1,000-foot radius from property line of source or receptor	
Accidental Release of Acutely Hazardous Air Pollutants*	None	Storage or use of acutely hazardous materials locating near receptors or new receptors locating near stored or used acutely hazardous materials considered significant	
Odors*	None	5 confirmed complaints per year averaged over three years	

Table 2-1
Air Quality CEQA Thresholds of Significance*

Pollutant	Construction-Related	Operational-Related
Plan-Level		
Criteria Air Pollutants and Precursors	None	1. Consistency with Current Air Quality Plan control measures, and 2. Projected VMT or vehicle trip increase is less than or equal to projected population increase
GHGs	None	Compliance with Qualified GHG Reduction Strategy OR 6.6 MT CO_2e/SP/yr (residents + employees)
Risks and Hazards*	None	1. Overlay zones around existing and planned sources of TACs (including adopted Risk Reduction Plan areas) and 2. Overlay zones of at least 500 feet from all freeways and high volume roadways
Accidental Release of Acutely Hazardous Air Pollutants	None	None
Odors*	None	Identify the location, and include policies to reduce the impacts, of existing or planned sources of odors
Regional Plans (Transportation and Air Quality Plans)		
GHGs, Criteria Air Pollutants and Precursors, and Toxic Air Contaminants	None	No net increase in emissions

CEQA = California Environmental Quality Act; CO = carbon monoxide; CO_2e = carbon dioxide equivalent; GHGs = greenhouse gases; lb/day = pounds per day; MT = metric tons; NO_X = oxides of nitrogen; $PM_{2.5}$= fine particulate matter with an aerodynamic resistance diameter of 2.5 micrometers or less; PM_{10} = respirable particulate matter with an aerodynamic resistance diameter of 10 micrometers or less; ppm = parts per million; ROG = reactive organic gases; SO_2 = sulfur dioxide; SP = service population; TACs = toxic air contaminants; TBP = toxic best practices; tons/day = tons per day; tpy = tons per year; yr= year; TBD: to be determined.

*The receptor thresholds were the subject of litigation in *California Building Industry Association v. Bay Area Air Quality Management District* (2015) 62 Cal. 4th 369. The use of the receptor thresholds is discussed in section 2.8 of these Guidelines.

** The Air District recommends that for construction projects that are less than one year duration, Lead Agencies should annualize impacts over the scope of actual days that peak impacts are to occur, rather than the full year.

2.1. CRITERIA AIR POLLUTANTS AND PRECURSORS – PROJECT LEVEL

Table 2-2 presents the *Thresholds of Significance* for operational-related criteria air pollutant and precursor emissions. These represent the levels at which a project's individual emissions of criteria air pollutants or precursors would result in a cumulatively considerable contribution to the SFBAAB's existing air quality conditions. If daily average or annual emissions of operational-

related criteria air pollutants or precursors would exceed any applicable *Threshold of Significance* listed in Table 2-2, the proposed project would result in a cumulatively significant impact.

Table 2-2
Thresholds of Significance for Operational-Related Criteria Air Pollutants and Precursors

Pollutant/Precursor	Maximum Annual Emissions (tpy)	Average Daily Emissions (lb/day)
ROG	10	54
NO_X	10	54
PM_{10}	15	82
$PM_{2.5}$	10	54

Notes: tpy = tons per year; lb/day = pounds per day; NO_X = oxides of nitrogen; $PM_{2.5}$ = fine particulate matter with an aerodynamic resistance diameter of 2.5 micrometers or lCOess; PM_{10} = respirable particulate matter with an aerodynamic resistance diameter of 10 micrometers or less; ROG = reactive organic gases; tpy = tons per year.
Refer to Appendix D for support documentation.

2.2. GREENHOUSE GASES – PROJECT LEVEL

The *Thresholds of Significance* for operational-related GHG emissions are:

- For land use development projects, the threshold is compliance with a qualified GHG Reduction Strategy; or annual emissions less than 1,100 metric tons per year (MT/yr) of CO_2e; or 4.6 MT CO_2e/SP/yr (residents + employees). Land use development projects include residential, commercial, industrial, and public land uses and facilities.

- For stationary-source projects, the threshold is 10,000 metric tons per year (MT/yr) of CO_2e. Stationary-source projects include land uses that would accommodate processes and equipment that emit GHG emissions and would require an Air District permit to operate.

If annual emissions of operational-related GHGs exceed these levels, the proposed project would result in a cumulatively considerable contribution of GHG emissions and a cumulatively significant impact to global climate change.

2.3. LOCAL COMMUNITY RISK AND HAZARD IMPACTS – PROJECT LEVEL

The *Thresholds of Significance* for local community risk and hazard impacts are identified below, which apply to the siting of a new source. Local community risk and hazard impacts are associated with TACs and $PM_{2.5}$ because emissions of these pollutants can have significant health impacts at the local level. If emissions of TACs or fine particulate matter with an aerodynamic resistance diameter of 2.5 micrometers or less ($PM_{2.5}$) exceed any of the *Thresholds of Significance*

listed below, the proposed project would result in a significant impact.

- Non-compliance with a qualified risk reduction plan; or
- An excess cancer risk level of more than 10 in one million, or a non-cancer (i.e., chronic or acute) hazard index greater than 1.0 would be a cumulatively considerable contribution; or
- An incremental increase of greater than 0.3 micrograms per cubic meter (μg/m^3) annual average $PM_{2.5}$ would be a cumulatively considerable contribution.

Cumulative Impacts

A project would have a cumulative considerable impact if the aggregate total of all past, present, and foreseeable future sources within a 1,000 foot radius from the fence line of a source plus the contribution from the project, exceeds the following:

- Non-compliance with a qualified risk reduction plan; or
- An excess cancer risk levels of more than 100 in one million or a chronic non-cancer hazard index (from all local sources) greater than 10.0; or
- 0.8 μg/m^3 annual average $PM_{2.5}$.

A lead agency should enlarge the 1,000-foot radius on a case-by-case basis if an unusually large source or sources of risk or hazard emissions that may affect a proposed project is beyond the recommended radius.

2.4. LOCAL CARBON MONOXIDE IMPACTS – PROJECT LEVEL

Table 2-3 presents the *Thresholds of Significance* for local CO emissions, the 1- and 8-hour California Ambient Air Quality Standards (CAAQS) of 20.0 parts per million (ppm) and 9.0 ppm, respectively. By definition, these represent levels that are protective of public health. If a project would cause local emissions of CO to exceed any of the *Thresholds of Significance* listed below, the proposed project would result in a significant impact to air quality.

Table 2-3
Thresholds of Significance for Local Carbon Monoxide Emissions

CAAQS Averaging Time	Concentration (ppm)
1-Hour	20.0
8-Hour	9.0
Refer to Appendix D for support documentation.	

2.5. ODOR IMPACTS – PROJECT LEVEL

The *Thresholds of Significance* for odor impacts are qualitative in nature. A project that would result in the siting of a new source should consider the screening level distances and the complaint history of the odor sources:

- Projects that would site a new odor source farther than the applicable screening distance shown in Table 3-3 from an existing receptor, would not likely result in a significant odor impact.

- A type of odor source with five (5) or more confirmed complaints in the new source area per year averaged over three years is considered to have a significant impact on receptors within the screening distance shown in Table 3-3.

Facilities that are regulated by the CalRecycle agency (e.g. landfill, composting, etc) are required to have Odor Impact Minimization Plans (OIMP) in place and have procedures that establish fence line odor detection thresholds. The Air District recognizes a Lead Agency's discretion under CEQA to use established odor detection thresholds as thresholds of significance for CEQA review for CalRecycle regulated facilities with an adopted OIMP. Refer to *Chapter 7 Assessing and Mitigating Odor Impacts* for further discussion of odor analysis.

2.6. CONSTRUCTION-RELATED IMPACTS – PROJECT LEVEL

2.6.1. Criteria Air Pollutants and Precursors

Table 2-4 presents the *Thresholds of Significance* for construction-related criteria air pollutant and precursor emissions. If daily average emissions of construction-related criteria air pollutants or precursors would exceed any applicable *Threshold of Significance* listed in Table 2-4, the project would result in a significant cumulative impact.

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Table 2-4
Thresholds of Significance for Construction-Related Criteria Air Pollutants and Precursors

Pollutant/Precursor	Daily Average Emissions (lb/day)
ROG	54
NO_X	54
PM_{10}	82*
$PM_{2.5}$	54*

* Applies to construction exhaust emissions only.

Notes: CO = carbon monoxide; lb/day = pounds per day; NO_X = oxides of nitrogen; $PM_{2.5}$ = fine particulate matter with an aerodynamic resistance diameter of 2.5 micrometers or less; PM_{10} = respirable particulate matter with an aerodynamic resistance diameter of 10 micrometers or less; ROG = reactive organic gases; SO_2 = sulfur dioxide. Refer to Appendix D for support documentation.

2.6.2. Greenhouse Gases

The District does not have an adopted *Threshold of Significance* for construction-related GHG emissions. However, the Lead Agency should quantify and disclose GHG emissions that would occur during construction, and make a determination on the significance of these construction-generated GHG emission impacts in relation to meeting AB 32 GHG reduction goals, as required by the Public Resources Code, Section 21082.2. The Lead Agency is encouraged to incorporate best management practices to reduce GHG emissions during construction, as feasible and applicable.

2.6.3. Local Community Risk and Hazards

The *Threshold of Significance* for construction-related local community risk and hazard impacts is the same as that for project operations. Construction-related TAC and PM impacts should be addressed on a case-by-case basis, taking into consideration the specific construction-related characteristics of each project and proximity to off-site receptors, as applicable. The Air District recommends that for construction projects that are less than one year duration, Lead Agencies should annualize impacts over the scope of actual days that peak impacts are to occur, rather than the full year.

2.7. THRESHOLDS OF SIGNIFICANCE FOR PLAN-LEVEL IMPACTS

The *Thresholds of Significance* for plans (e.g., general plans, community plans, specific plans, regional plans, congestion management plans, etc.) within the SFBAAB are summarized in Table 2-5 and discussed separately below.

Table 2-5
Thresholds of Significance for Plans*

Criteria Air Pollutants and Precursors	Construction: none Operational: Consistency with Current AQP and projected VMT or vehicle trip increase is less than or equal to projected population increase.
GHGs	Construction: none Operational: 6.6 MT CO_2e/SP/yr (residents & employees) or a Qualified GHG Reduction Strategy. The efficiency threshold should only be applied to general plans. Other plans, e.g. specific plans, congestion management plans, etc., should use the project-level threshold of 4.6 CO_2e/SP/yr.
Local Community Risk and Hazards	Land use diagram identifies special overlay zones around existing and planned sources of TACs and $PM_{2.5}$, including special overlay zones of at least 500 feet (or Air District-approved modeled distance) on each side of all freeways and high-volume roadways, and plan identifies goals, policies, and objectives to minimize potentially adverse impacts.
Odors	Identify locations of odor sources in plan; identify goals, policies, and objectives to minimize potentially adverse impacts.
Regional Plans (transportation and air quality plans)	No net increase in emissions of GHGs, Criteria Air Pollutants and Precursors, and Toxic Air Contaminants. Threshold only applies to regional transportation and air quality plans.

* The receptor thresholds were the subject of litigation in *California Building Industry Association v. Bay Area Air Quality Management District* (2015) 62 Cal. 4th 369. The use of the receptor thresholds is discussed in section 2.8 of these Guidelines.

Notes: AQP = Air Quality Plan; CO_2e = carbon dioxide equivalent; GHGs = greenhouse gases; MT = metric tons; SP = service population; TACs = toxic air contaminants; yr = year; $PM_{2.5}$= fine particulate matter

Refer to Appendix D for support documentation.

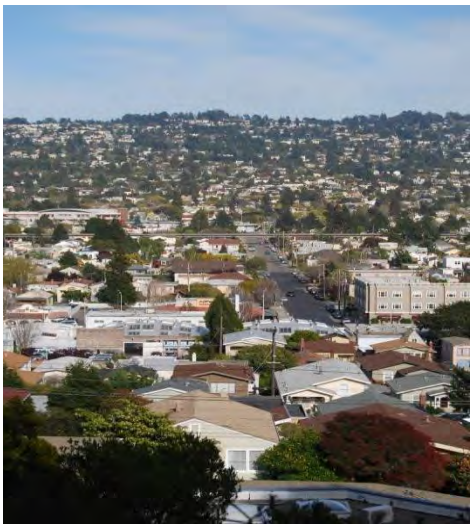
2.7.1. Criteria Air Pollutants and Precursor Emissions

Proposed plans (except regional plans) must show the following over the planning period of the plan to result in a less than significant impact:

- Consistency with current air quality plan control measures.
- A proposed plan's projected VMT or vehicle trips (VT) (either measure may be used) increase is less than or equal to its projected population increase.

2.7.2. Greenhouse Gases

The *Threshold of Significance* for operational-related GHG impacts of plans employs either a GHG efficiency-based metric (per Service Population [SP]), or a GHG Reduction Strategy option, described in Section 4.3.



The *Thresholds of Significance* options for plan level GHG emissions are:

- A GHG efficiency metric of 6.6 MT per SP per year of carbon dioxide equivalent (CO_2e). If annual maximum emissions of operational-related GHGs exceed this level, the proposed plan would result in a significant impact to global climate change.
- Consistency with an adopted GHG Reduction Strategy. If a proposed plan is consistent with an adopted GHG Reduction Strategy that meets the standards described in Section 4.3, the plan would be considered to have a less than significant impact. This approach is consistent with the plan elements described in the State CEQA Guidelines, Section 15183.5.

2.7.3. Local Community Risk and Hazards

The *Thresholds of Significance* for plans with regard to community risk and hazard impacts are:

1. The land use diagram must identify:
    a. Special overlay zones around existing and planned sources of TACs and PM (including adopted risk reduction plan areas); and
    b. Special overlay zones of at least 500 feet (or Air District-approved modeled distance) on each side of all freeways and high-volume roadways.
2. The plan must also identify goals, policies, and objectives to minimize potential impacts and create overlay zones around sources of TACs, PM, and hazards.

Although the Risk and Hazard Thresholds recommend evaluating the impacts of locating new development in areas subject to high levels of TACs and PM, the California Supreme Court determined in 2015 that, as a general rule, CEQA does not require this analysis. Section 2.8 below discusses the Supreme Court's decision with respect to the use of the Risk and Hazard Thresholds.

2.7.4. Odors

The *Thresholds of Significance* for plans with regard to odor impacts are to identify locations of odor sources in a plan and the plan must also identify goals, policies, and objectives to minimize potentially adverse impacts.

2.7.5. Regional Plans

The *Thresholds of Significance* for regional plans is to achieve a no net increase in emissions of criteria pollutants and precursors, GHG, and toxic air contaminants. This threshold applies only to regional transportation and air quality plans.

2.8 Receptor Thresholds

The Receptor Thresholds in these Guidelines address the analysis of exposing new receptors to existing sources of toxic air pollution and odors. These Thresholds were the subject of litigation brought by the California Building Industry Association. The California Supreme Court's decision in that litigation states that: "CEQA generally does not require an analysis of how existing environmental conditions will impact a project's future users or residents . . . Despite the statute's evident concern with protecting the environment and human health, its relevant provisions are best read to focus almost entirely on how projects affect the environment." The Supreme Court upheld "evaluating a project's potentially significant exacerbating effects on existing environmental hazards . . .Because this type of inquiry still focuses on the project's impacts on the environment—how a project might worsen existing conditions—directing an agency to evaluate how such worsened conditions could affect a project's future users or residents is entirely consistent with this focus and with CEQA as a whole."

The Supreme Court also determined that CEQA requires an analysis of exposing new receptors to existing environmental hazards "in several specific contexts involving certain airport (§ 21096) and school construction projects (§ 21151.8), and some housing development projects (§§ 21159.21, subds. (f), (h), 21159.22, subds. (a), (b)(3), 21159.23, subd. (a)(2)(A), 21159.24, subd. (a)(1), (3), 21155.1, subd. (a)(4), (6))." These provisions "constitute specific exceptions to CEQA's general rule requiring consideration only of a project's effect on the environment, not the environment's effects on project users."

The Supreme Court also indicated that nothing in CEQA prevents local agencies from considering the impact of locating new development in areas subject to existing environmental hazards. However, the Court of Appeal explained "CEQA cannot be used by a lead agency to require a developer or other agency to obtain an EIR or implement mitigation measures solely because the occupants or users of a new project would be subjected to the levels of emissions specified, an agency may do so voluntarily on its own project and may use the Receptor Thresholds for guidance." The Court of Appeal also explained that, under CEQA, the Receptor Thresholds should not be applied to "routinely assess the effect of existing environmental conditions on future users or occupants of a project." The courts did not address the extent to which agencies could rely on their police power, general plans, or other regulatory authority outside of CEQA to require mitigation to address existing environmental hazards. For more information on planning approaches to addressing the impacts of locating new development in areas subject to existing air pollution, please see "Planning Healthy Places." http://www.baaqmd.gov/plans-and-climate/planning-healthy-places

Under the appropriate circumstances described above, the District recommends the following Receptor Thresholds:

Table 2-6

Receptor Thresholds

Risks and Hazards (Individual Project)	Compliance with Qualified Community Risk Reduction Plan OR Increased cancer risk of >10.0 in a million Increased non-cancer risk of > 1.0 Hazard Index (Chronic or Acute) Ambient PM2.5 increase: >0.3 µg/m3 annual average Zone of Influence: 1,000-foot radius from property line of receptor
Risks and Hazards (Cumulative Threshold)	Compliance with Qualified Community Risk Reduction Plan OR Cancer: > 100 in a million (from all local sources) Non-cancer: > 10.0 Hazard Index (from all local sources) (Chronic) PM2.5: > 0.8 µg/m3 annual average (from all local sources) Zone of Influence: 1,000-foot radius from property line of receptor
Accidental Release of Acutely Hazardous Air Pollutants	New receptors locating near stored or used acutely hazardous materials considered significant
Odors	5 confirmed complaints per year averaged over three years

3. SCREENING CRITERIA

The screening criteria identified in this section are **not thresholds of significance**. The Air District developed screening criteria to provide lead agencies and project applicants with a conservative indication of whether the proposed project could result in potentially significant air quality impacts. If all of the screening criteria are met by a proposed project, then the lead agency or applicant would not need to perform a detailed air quality assessment of their project's air pollutant emissions. These screening levels are generally representative of new development on greenfield sites without any form of mitigation measures taken into consideration. In addition, the screening criteria in this section do not account for project design features, attributes, or local development requirements that could also result in lower emissions. For projects that are mixed-use, infill, and/or proximate to transit service and local services, emissions would be less than the greenfield type project that these screening criteria are based on.

If a project includes emissions from stationary source engines (e.g., back-up generators) and industrial sources subject to Air District Rules and Regulations, the screening criteria should not be used. The project's stationary source emissions should be analyzed separately from the land use-related indirect mobile- and area-source emissions. Stationary-source emissions are not included in the screening estimates given below and, for criteria pollutants, must be added to the indirect mobile- and area-source emissions generated by the land use development and compared to the appropriate Thresholds of Significance. Greenhouse gas emissions from permitted stationary sources should not be combined with operational emissions, but compared to a separate stationary source greenhouse gas threshold.

3.1. OPERATIONAL-RELATED IMPACTS

3.1.1. Criteria Air Pollutants and Precursors

The screening criteria developed for criteria pollutants and precursors were derived using the default assumptions used by the Urban Land Use Emissions Model (URBEMIS). If the project has sources of emissions not evaluated in the URBEMIS program the screening criteria should not be used. If the project meets the screening criteria in Table 3-1, the project would not result in the generation of operational-related criteria air pollutants and/or precursors that exceed the *Thresholds of Significance* shown in Table 2-2. Operation of the proposed project would therefore result in a less-than-significant cumulative impact to air quality from criteria air pollutant and precursor emissions.

3.1.2. Greenhouse Gases

The screening criteria developed for greenhouse gases were derived using the default emission assumptions in URBEMIS and using off-model GHG estimates for indirect emissions from electrical generation, solid waste and water conveyance. If the project has other significant sources of GHG emissions not accounted for in the methodology described above, then the screening criteria should not be used. Projects below the applicable screening criteria shown in Table 3-1 would not exceed the 1,100 MT of CO_2e/yr GHG threshold of significance for projects other than permitted stationary sources.

If a project, including stationary sources, is located in a community with an adopted qualified GHG Reduction Strategy, the project may be considered less than significant if it is consistent with the GHG Reduction Strategy. A project must demonstrate its consistency by identifying and implementing all applicable feasible measures and policies from the GHG Reduction Strategy into the project.

Table 3-1
Operational-Related Criteria Air Pollutant and Precursor Screening Level Sizes

Land Use Type	Operational Criteria Pollutant Screening Size	Operational GHG Screening Size	Construction-Related Screening Size
Single-family	325 du (NOX)	56 du	114 du (ROG)
Apartment, low-rise	451 du (ROG)	78 du	240 du (ROG)
Apartment, mid-rise	494 du (ROG)	87 du	240 du (ROG)
Apartment, high-rise	510 du (ROG)	91 du	249 du (ROG)
Condo/townhouse, general	451 du (ROG)	78 du	240 du (ROG)
Condo/townhouse, high-rise	511 du (ROG)	92 du	252 du (ROG)
Mobile home park	450 du (ROG)	82 du	114 du (ROG)
Retirement community	487 du (ROG)	94 du	114 du (ROG)
Congregate care facility	657 du (ROG)	143 du	240 du (ROG)
Day-care center	53 ksf (NOX)	11 ksf	277 ksf (ROG)
Elementary school	271 ksf (NOX)	44 ksf	277 ksf (ROG)
Elementary school	2747 students (ROG)	-	3904 students (ROG)
Junior high school	285 ksf (NOX)	-	277 ksf (ROG)
Junior high school	2460 students (NOX)	46 ksf	3261 students (ROG)
High school	311 ksf (NOX)	49 ksf	277 ksf (ROG)
High school	2390 students (NOX)	-	3012 students (ROG)
Junior college (2 years)	152 ksf (NOX)	28 ksf	277 ksf (ROG)
Junior college (2 years)	2865 students (ROG)	-	3012 students (ROG)
University/college (4 years)	1760 students (NOX)	320 students	3012 students (ROG)
Library	78 ksf (NOX)	15 ksf	277 ksf (ROG)
Place of worship	439 ksf (NOX)	61 ksf	277 ksf (ROG)
City park	2613 acres (ROG)	600 acres	67 acres (PM10)
Racquet club	291 ksf (NOX)	46 ksf	277 ksf (ROG)
Racquetball/health	128 ksf (NOX)	24 ksf	277 ksf (ROG)
Quality restaurant	47 ksf (NOX)	9 ksf	277 ksf (ROG)
High turnover restaurant	33 ksf (NOX)	7 ksf	277 ksf (ROG)
Fast food rest. w/ drive thru	6 ksf (NOX)	1 ksf	277 ksf (ROG)
Fast food rest. w/o drive thru	8 ksf (NOX)	1 ksf	277 ksf (ROG)
Hotel	489 rooms (NOX)	83 rooms	554 rooms (ROG)
Motel	688 rooms (NOX)	106 rooms	554 rooms (ROG)
Free-standing discount store	76 ksf (NOX)	15 ksf	277 ksf (ROG)
Free-standing discount superstore	87 ksf (NOX)	17 ksf	277 ksf (ROG)
Discount club	102 ksf (NOX)	20 ksf	277 ksf (ROG)
Regional shopping center	99 ksf (NOX)	19 ksf	277 ksf (ROG)
Electronic Superstore	95 ksf (NOX)	18 ksf	277 ksf (ROG)
Home improvement superstore	142 ksf (NOX)	26 ksf	277 ksf (ROG)
Strip mall	99 ksf (NOX)	19 ksf	277 ksf (ROG)
Hardware/paint store	83 ksf (NOX)	16 ksf	277 ksf (ROG)
Supermarket	42 ksf (NOX)	8 ksf	277 ksf (ROG)
Convenience market (24 hour)	5 ksf (NOX)	1 ksf	277 ksf (ROG)
Convenience market with gas pumps	4 ksf (NOX)	1 ksf	277 ksf (ROG)
Bank (with drive-through)	17 ksf (NOX)	3 ksf	277 ksf (ROG)
General office building	346 ksf (NOX)	53 ksf	277 ksf (ROG)

Table 3-1
Operational-Related Criteria Air Pollutant and Precursor Screening Level Sizes

Land Use Type	Operational Criteria Pollutant Screening Size	Operational GHG Screening Size	Construction-Related Screening Size
Office park	323 ksf (NOX)	50 ksf	277 ksf (ROG)
Government office building	61 ksf (NOX)	12 ksf	277 ksf (ROG)
Government (civic center)	149 ksf (NOX)	27 ksf	277 ksf (ROG)
Pharmacy/drugstore w/ drive through	49 ksf (NOX)	10 ksf	277 ksf (ROG)
Pharmacy/drugstore w/o drive through	48 ksf (NOX)	10 ksf	277 ksf (ROG)
Medical office building	117 ksf (NOX)	22 ksf	277 ksf (ROG)
Hospital	226 ksf (NOX)	39 ksf	277 ksf (ROG)
Hospital	334 beds (NOX)	84 ksf	337 beds (ROG)
Warehouse	864 ksf (NOX)	64 ksf	259 ksf (NOX)
General light industry	541 ksf (NOX)	121 ksf	259 ksf (NOX)
General light industry	72 acres (NOX)	-	11 acres (NOX)
General light industry	1249 employees (NOX)	-	540 employees (NOX)
General heavy industry	1899 ksf (ROG)	-	259 ksf (NOX)
General heavy industry	281 acres (ROG)	-	11 acres (NOX)
Industrial park	553 ksf (NOX)	65 ksf	259 ksf (NOX)
Industrial park	61 acres (NOX)	-	11 acres (NOX)
Industrial park	1154 employees (NOX)	-	577 employees (NOX)
Manufacturing	992 ksf (NOX)	89 ksf	259 ksf (NOX)

Notes: du = dwelling units; ksf = thousand square feet; NO_X = oxides of nitrogen; ROG = reactive organic gases.
Screening levels include indirect and area source emissions. Emissions from engines (e.g., back-up generators) and industrial sources subject to Air District Rules and Regulations embedded in the land uses are not included in the screening estimates and must be added to the above land uses.
Refer to Appendix D for support documentation.
Source: Modeled by EDAW 2009.

3.2. COMMUNITY RISK AND HAZARD IMPACTS

Please refer to Chapter 5 for discussion of screening criteria for local community risk and hazard impacts.

3.3. CARBON MONOXIDE IMPACTS

This preliminary screening methodology provides the Lead Agency with a conservative indication of whether the implementation of the proposed project would result in CO emissions that exceed the *Thresholds of Significance* shown in Table 2-3.

The proposed project would result in a less-than-significant impact to localized CO concentrations if the following screening criteria is met:

1. Project is consistent with an applicable congestion management program established by the county congestion management agency for designated roads or highways, regional transportation plan, and local congestion management agency plans.

2. The project traffic would not increase traffic volumes at affected intersections to more than 44,000 vehicles per hour.
3. The project traffic would not increase traffic volumes at affected intersections to more than 24,000 vehicles per hour where vertical and/or horizontal mixing is substantially limited (e.g., tunnel, parking garage, bridge underpass, natural or urban street canyon, below-grade roadway).

3.4. ODOR IMPACTS

Table 3-3 presents odor screening distances recommended by BAAQMD for a variety of land uses. Projects that would site a new odor source or a new receptor farther than the applicable screening distance shown in Table 3-3 from an existing receptor or odor source, respectively, would not likely result in a significant odor impact. The odor screening distances in Table 3-3 should not be used as absolute screening criteria, rather as information to consider along with the odor parameters and complaint history. Refer to *Chapter 7 Assessing and Mitigating Odor Impacts* for comprehensive guidance on significance determination.

Table 3-3
Odor Screening Distances

Land Use/Type of Operation	Project Screening Distance
Wastewater Treatment Plant	2 miles
Wastewater Pumping Facilities	1 mile
Sanitary Landfill	2 miles
Transfer Station	1 mile
Composting Facility	1 mile
Petroleum Refinery	2 miles
Asphalt Batch Plant	2 miles
Chemical Manufacturing	2 miles
Fiberglass Manufacturing	1 mile
Painting/Coating Operations	1 mile
Rendering Plant	2 miles
Coffee Roaster	1 mile
Food Processing Facility	1 mile
Confined Animal Facility/Feed Lot/Dairy	1 mile
Green Waste and Recycling Operations	1 mile
Metal Smelting Plants	2 miles
Refer to Appendix D for support documentation.	

Facilities that are regulated by CalRecycle (e.g. landfill, composting, etc.) are required to have Odor Impact Minimization Plans (OIMP) in place and have procedures that establish fence line odor detection thresholds. The Air District recognizes a Lead Agency's discretion under CEQA to use established odor detection thresholds as thresholds of significance for CEQA review for CalRecycle regulated facilities with an adopted OIMP.

3.5. CONSTRUCTION-RELATED IMPACTS

3.5.1. Criteria Air Pollutants and Precursors

This preliminary screening provides the Lead Agency with a conservative indication of whether the proposed project would result in the generation of construction-related criteria air pollutants and/or precursors that exceed the *Thresholds of Significance* shown in Table 2-4.

If all of the following *Screening Criteria* are met, the construction of the proposed project would result in a less-than-significant impact from criteria air pollutant and precursor emissions.

1. The project is below the applicable screening level size shown in Table 3-1; and
2. All *Basic Construction Mitigation Measures* would be included in the project design and implemented during construction; and
3. Construction-related activities would not include any of the following:
    a. Demolition;
    b. Simultaneous occurrence of more than two construction phases (e.g., paving and building construction would occur simultaneously);
    c. Simultaneous construction of more than one land use type (e.g., project would develop residential and commercial uses on the same site) (not applicable to high density infill development);
    d. Extensive site preparation (i.e., greater than default assumptions used by the Urban Land Use Emissions Model [URBEMIS] for grading, cut/fill, or earth movement); or
    e. Extensive material transport (e.g., greater than 10,000 cubic yards of soil import/export) requiring a considerable amount of haul truck activity.

3.5.2. Community Risk and Hazards

Chapter 5, *Assessing and Mitigating Local Community Risk and Hazard Impacts*, contains information on screening criteria for local risk and hazards.

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PART II: ASSESSING & MITIGATING PROJECT LEVEL IMPACTS

4. OPERATIONAL-RELATED IMPACTS

Operational emissions typically represent the majority of a project's air quality impacts. After a project is built, operational emissions, including mobile and area sources, are anticipated to occur continuously throughout the project's lifetime. Operational-related activities, such as driving, use of landscape equipment, and wood burning, could generate emissions of criteria air pollutants and their precursors, GHG, TACs, and PM. Area sources generally include fuel combustion from space and water heating, landscape maintenance equipment, and fireplaces/stoves, evaporative emissions from architectural coatings and consumer products and unpermitted emissions from stationary sources. This chapter provides recommendations for assessing and mitigating operational-related impacts for individual projects. Recommendations for assessing and mitigating operational-related impacts at the plan-level are discussed in Chapter 9. Chapter 9 also contains guidance for assessing a project's consistency with applicable air quality plans.

When calculating project emissions to compare to the thresholds of significance, lead agencies should account for reductions that would result from state, regional, and local rules and regulations. The Air District also recommends for lead agencies to consider project design features, attributes, or local development requirements as part of the project as proposed and not as mitigation measures. For example, projects that are mixed-use, infill, and/or proximate to transit service and local services, or that provide neighborhood serving commercial and retail services would have substantially lower vehicle trip rates and associated criteria pollutant and GHG emissions than what would be reflected in standard, basin-wide average URBEMIS default trip rates and emission estimates. A project specific transportation study should identify the reductions that can be claimed by projects with the above described attributes. The Air District, in association with the California Air Pollution Control Officers Association (CAPCOA), is currently developing guidance for estimating reductions in standard vehicle trip rates and vehicle miles traveled (VMT) that can be claimed for these land use types that do not develop project specific transportation studies. This additional guidance will be posted to the District website in July 2010.

To estimate a project's carbon dioxide equivalent emissions from direct and indirect emission sources, BAAQMD recommends using the BAAQMD GHG Model (BGM). The Air District developed this model to calculate GHG emissions not included in URBEMIS such as indirect emissions from electricity use and waste and direct fugitive emissions of refrigerants. The BGM is discussed in more detail in Section 4.2 below.

4.1. CRITERIA AIR POLLUTANT AND PRECURSOR EMISSIONS

4.1.1. Significance Determination

Step 1: Comparison of Project Attributes with Screening Criteria

The first step in determining the significance of operational-related criteria air pollutants and precursors is to compare the attributes of the proposed project with the applicable S*creening Criteria* listed in Chapter 3. This preliminary screening provides a conservative indication of whether operation of the proposed project would result in the generation of criteria air pollutants and/or precursors that exceed the *Thresholds of Significance* listed in Chapter 2. If all of the *Screening Criteria* are met, the operation of the proposed project would result in a less than significant impact to air quality. If the proposed project does not meet all the *Screening Criteria*, then project emissions need to be quantified.

Step 2: Emissions Quantification

If a proposed project involves the removal of existing emission sources, BAAQMD recommends subtracting the existing emissions levels from the emissions levels estimated for the new proposed land use. This net calculation is permissible only if the existing emission sources were operational at the time that the Notice of Preparation (NOP) for the CEQA project was circulated or in the absence of an NOP when environmental analysis begins, and would continue if the proposed redevelopment project is not approved. This net calculation is not permitted for emission sources that ceased to operate, or the land uses were vacated and/or demolished, prior to circulation of the NOP or the commencement of environmental analysis. This approach is consistent with the definition of baseline conditions pursuant to CEQA.

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Land Use Development Projects

For proposed land use development projects, BAAQMD recommends using the most current version of URBEMIS (which to date is version 9.2.4) to quantify operational-related criteria air pollutants and precursors. URBEMIS is a modeling tool initially developed by the California Air Resources Board for calculating air pollutant emissions from land use development projects. URBEMIS uses EMFAC emission factors and ITE trip generation rates to calculate ROG, NO_X, carbon monoxide, particulate matter, carbon dioxide, and total vehicle trips. URBEMIS is not equipped for calculating air quality impacts from stationary sources or plans. For land use projects, URBEMIS quantifies emissions from area sources (e.g., natural gas fuel combustion for space and water heating, wood stoves and fireplace combustion, landscape maintenance equipment, consumer products, and architectural coating) and operational-related emissions (mobile sources).

Appendix B contains more detailed instructions for using URBEMIS to model operational emissions.

Stationary-Source Facilities

A stationary source consists of a single emission source with an identified emission point, such as a stack at a facility. Facilities can have multiple emission point sources located on-site and sometimes the facility as a whole is referred to as a stationary source. Major stationary sources are typically associated with industrial processes, such as refineries or power plants. Minor stationary sources are typically land uses that may require air district permits, such as gasoline dispensing stations, and dry cleaning establishments. Examples of other District-permitted stationary sources include back-up diesel generators, boilers, heaters, flares, cement kilns, and other types of combustion equipment, as well as non-combustion sources such as coating or printing operations. BAAQMD is responsible for issuing permits for the construction and operation of stationary sources in order to reduce air pollution, and to attain and maintain the national and California ambient air quality standards in the SFBAAB. Newly modified or constructed stationary sources subject to Air District permitting may be required to implement Best Available Control Technology (BACT), which may include the installation of emissions control equipment or the implementation of administrative practices that would result in the lowest achievable emission rate. Stationary sources may also be required to offset their emissions of criteria air pollutants and precursors to be permitted. This may entail shutting down or augmenting another stationary source at the same facility. Facilities also may purchase an emissions reduction credit to offset their emissions. Any stationary source emissions remaining after the application of BACT and

offsets should be added to the indirect and area source emissions estimated above to arrive at total project emissions.

URBEMIS is not equipped to estimate emissions generated by stationary sources. Instead emissions from stationary sources should be estimated using manual calculation methods in consultation with BAAQMD. When stationary sources will be subject to BAAQMD regulations, the regulation emission limits should be used as emission factors. If BAAQMD emission limits are not applicable, alternative sources of emission factors include: EPA AP-42 emission factors for particular industrial processes, manufacturer specifications for specific equipment, throughput data (e.g., fuel consumption, rate of material feedstock input) and other specifications provided by the project engineer. To the extent possible, BAAQMD recommends that the methodology used to estimate stationary-source emissions be consistent with calculations that would need to be performed to fulfill requirements of the permitting process and provided in the CEQA document.

Step 3: Comparison of Unmitigated Emissions with Thresholds of Significance

Sum the estimated emissions for area, mobile, and stationary sources (if any) for each pollutant as explained above and compare the total average daily and annual emissions of each criteria pollutant and their precursors with the applicable *Thresholds of Significance* (refer to Table 2-2). If daily average or annual emissions of operational-related criteria air pollutants or precursors do not exceed any of the *Thresholds of Significance*, the project would result in a less than significant impact to air quality. If the quantified emissions of operational-related criteria air pollutants or precursors do exceed any applicable *Threshold of Significance,* the proposed project would result in a significant impact to air quality and CEQA requires implementation of all feasible mitigation measures.

Step 4: Mitigation Measures and Emission Reductions

Where operational-related emissions exceed applicable *Thresholds of Significance*, lead agencies are responsible for implementing all feasible mitigation measures to reduce the project's air quality impacts. Section 4.2 contains numerous examples of mitigation measures and associated emission reductions that may be applied to projects. The project's mitigated emission estimates from mitigation measures included in the proposed project or recommended by the lead agency should be quantified and disclosed in the CEQA document.

Step 5: Comparison of Mitigated Emissions with Thresholds of Significance

Compare the total average daily and annual amounts of mitigated criteria air pollutants and precursors with the applicable *Thresholds of Significance* (refer to Table 4-1). If the implementation of mitigation measures, including off-site mitigation, would reduce all operational-related criteria air pollutants and precursors to levels below the applicable *Thresholds of Significance*, the impact to air quality would be reduced to a less than significant level. Implementation of mitigation measures means that they are made conditions of project approval and included in a Mitigation Monitoring and Reporting Plan (MMRP). If mitigated levels of any criteria air pollutant or precursor would still exceed the applicable *Threshold of Significance*, the impact to air quality would remain significant and unavoidable.

Table 4-1
Example Operational Criteria Air Pollutant and Precursor Emissions Analysis

Step	Emissions Source	Emissions (lb/day or tpy)*			
		ROG	NO_X	PM_{10}	$PM_{2.5}$
2	Area Sources	A	A	A	A
	Mobile Sources	B	B	B	B
	Stationary Sources	C	C	C	C
	Total Unmitigated Emissions	A + B + C = D	A + B + C = D	A + B + C = D	A + B + C = D
	BAAQMD Threshold	54 lb/day or 10 tpy	54 lb/day or 10 tpy	82 lb/day or 15 tpy	54 lb/day or 10 tpy
3	Unmitigated Emissions Exceed BAAQMD Threshold?	Is D > Threshold? (If Yes, significant. Go to step 4. If No, less than significant)			
4	Mitigated Emissions	E	E	E	E
5	Mitigated Emissions Exceed BAAQMD Threshold?	Is E > Threshold? (If Yes, significant and unavoidable. If No, less than significant with mitigation incorporated)			

* Letters "A", "B", and "C" are used to represent numeric values that would be obtained through modeling for area and mobile sources, and by manual calculations for stationary source-emissions. "D" represents the sum of "A", "B", and "C" (i.e., unmitigated emissions). "E" represents mitigated emissions.
Notes: lb/day = pounds per day; NO_X = oxides of nitrogen; $PM_{2.5}$ = fine particulate matter with an aerodynamic resistance diameter of 2.5 micrometers or less; PM_{10} = respirable particulate matter with an aerodynamic resistance diameter of 10 micrometers or less; ROG = reactive organic gases; tpy = tons per year.
Refer to Appendix D for support documentation.

4.2. GREENHOUSE GAS IMPACTS

4.2.1. Significance Determination

Step 1: Comparison of Project Attributes with Screening Criteria

The first step in determining the significance of operational-related GHG emissions is to compare the attributes of the proposed project with the applicable S*creening Criteria* (Refer to Chapter 3). If all of the *Screening Criteria* are met, the operation of the proposed project would result in a less than significant impact to global climate change. If the proposed project does not meet all the *Screening Criteria*, then project emissions need to be quantified.

If a project is located in a community with an adopted qualified GHG Reduction Strategy (described in section 4.3), the project may be considered less than significant if it is consistent with the GHG Reduction Strategy. A project must demonstrate its consistency by identifying and implementing all applicable feasible measures and policies from the GHG Reduction Strategy into the project.

Step 2: Emissions Quantification

For quantifying a project's GHG emissions, BAAQMD recommends that all GHG emissions from a project be estimated, including a project's direct and indirect GHG emissions from operations. Direct emissions refer to emissions produced from onsite combustion of energy, such as natural gas used in furnaces and boilers, emissions from industrial processes, and fuel combustion from mobile sources. Indirect emissions are emissions produced offsite from energy production and water conveyance due to a project's energy use and water consumption. See Table 4-2 for a list of GHG emission sources and types that should be estimated for projects.

Biogenic CO_2 emissions should not be included in the quantification of GHG emissions for a project. Biogenic CO_2 emissions result from materials that are derived from living cells, as opposed to CO_2 emissions derived from fossil fuels, limestone and other materials that have been transformed by geological processes. Biogenic CO_2 contains carbon that is present in organic materials that include, but are not limited to, wood, paper, vegetable oils, animal fat, and food, animal and yard waste.

The GHG emissions from permitted stationary sources should be calculated separately from a project's operational emissions. Permitted stationary sources are subject to a different threshold than land use developments. For example, if a proposed project anticipates having a permitted stationary source on site, such as a back-up generator, the GHG emissions from the generator should not be added to the project's total emissions. The generator's GHG emissions should be calculated separately and compared to the GHG threshold for stationary sources to determine its impact level.

If a proposed project involves the removal of existing emission sources, BAAQMD recommends subtracting the existing emissions levels from the emissions levels estimated for the new proposed land use. This net calculation is permissible only if the existing emission sources were operational at the time that the Notice of Preparation (NOP) for the CEQA project was circulated (or in the absence of an NOP when environmental analysis begins), and would continue if the proposed redevelopment project is not approved. This net calculation is not permitted for emission sources that ceased to operate, or the land uses were vacated and/or demolished, prior to circulation of the NOP or the commencement of environmental analysis. This approach is consistent with the definition of baseline conditions pursuant to CEQA.

BAAQMD Greenhouse Gas Model

BAAQMD recommends using URBEMIS to estimate direct CO_2 emissions from area and mobile sources. The same detailed guidance described for criteria air pollutants and precursors (Section 4.1 above) could be followed for quantifying GHG emissions as appropriate. URBEMIS estimates the modeled emissions output in units of short tons; the URBEMIS output may be converted to metric tons by multiplying the amount of short tons by 0.91.

To estimate a project's carbon dioxide equivalent emissions from direct and indirect emission sources, BAAQMD recommends using the BAAQMD GHG Model (BGM). The Air District developed this model to calculate GHG emissions not included in URBEMIS such as indirect emissions from electricity use and waste and direct fugitive emissions of refrigerants. The BGM

also adjusts for state regulations not included in URBEMIS, specifically California's low carbon fuel rules and Pavley regulations.

The BGM imports project inputs and emission results from URBEMIS to quantify carbon dioxide equivalent emissions from additional direct and indirect sources not included in URBEMIS, such as water supply, waste disposal, electricity generation and refrigerants. The BGM also contains a range of GHG reduction strategies/mitigation measures that may be applied to projects. The BGM also adjusts emission totals to reflect reductions from adopted state regulations such as Pavley and the low carbon fuel standard. This model is available without cost and may be downloaded at: http://www.baaqmd.gov/Divisions/Planning-and-Research/CEQA-GUIDELINES.aspx. The BGM is run using Microsoft Excel. Refer to the BGM user's manual for detailed instructions on using the model.

Table 4-2 outlines the recommended methodologies for estimating a project's GHG emissions.

Table 4-2
Guidance for Estimating a Project's Operations GHG Emissions

Emission Source	Emission Type	GHG	Methodology
Area Sources (natural gas, hearth, landscape fuel, etc.)	Direct - natural gas and fuel combustion	CO_2, CH_4, N_20	URBEMIS and BGM
Transportation	Direct - fuel combustion	CO_2, CH_4, N_20	URBEMIS and BGM
Electricity consumption	Indirect - electricity	CO_2, CH_4, N_20	BGM
Solid waste landfill (non-biogenic emissions)*	Direct - landfill	CH_4	BGM
Solid waste transport	Indirect - fuel combustion	CO_2, CH_4, N_20	BGM
Water consumption	Indirect - electricity	CO_2, CH_4, N_20	BGM
Wastewater (non-biogenic emissions)*	Indirect - electricity	CO_2, CH_4, N_20	BGM
Industrial process emissions	Direct	CO_2, CH_4, N_20, and refrigerants	BGM and BAAQMD permits**
Fugitive emissions	Direct	CO_2, CH_4, N_20, and refrigerants	BGM

* Biogenic CO_2 emissions should not be included in the quantification of GHG emissions for a project.
** Industrial processes permitted by the Air District must use the methodology provided in BAAQMD rules and regulations. Other industrial process emissions, such as commercial refrigerants, should use the BGM.

CO_2 (carbon dioxide), CH_4 (methane), N_20 (nitrous oxides), and refrigerants (HFCs and PFCs).

In cases where users may need to estimate a project's GHG emissions manually, BAAQMD recommends using ARB's most current Local Government Operations Protocol (LGOP) as appropriate for guidance. The most current LGOP may be downloaded from ARB's website.

Step 3: Comparison of Unmitigated Emissions with Thresholds of Significance

Sum the estimated GHG emissions from area and mobile sources and compare the total annual GHG emissions with the applicable *Threshold of Significance*. If annual emissions of operational-related GHGs do not exceed the *Threshold of Significance*, the project would result in a less than significant impact to global climate change. If annual emissions do exceed the *Threshold of Significance,* the proposed project would result in a significant impact to global climate change and will require mitigation measures for emission reductions.

Step 4: Mitigation Measures and Emission Reductions

Where operational-related emissions exceed applicable *Thresholds of Significance*, lead agencies are responsible for implementing all feasible mitigation measures to reduce the project's GHG emissions. Section 4.2 contains recommended mitigation measures and associated emission reductions. The Air District recommends using the BGM if additional reductions are needed. The air quality analysis should quantify the reduction of emissions associated with any proposed mitigation measures and include this information in the CEQA document.

Step 5: Comparison of Mitigated Emissions with Thresholds of Significance

Compare the total annual amount of mitigated GHGs with the applicable *Threshold of Significance,* as demonstrated in Table 4-3. If the implementation of project proposed or required mitigation measures would reduce operational-related GHGs to a level below either the 1,100 MT CO_2e/yr or 4.6 MT CO_2e/SP/yr *Threshold of Significance*, the impact would be reduced to a less than significant level. If mitigated levels still exceed the applicable *Threshold of Significance*, the impact to global climate change would remain significant and unavoidable.

Table 4-3
Example of Operational Greenhouse Gas Emissions Analysis

Step	Emissions Source	Emissions (MT CO_2e/yr)*
2	Area Sources	A
	Mobile Sources	B
	Indirect Sources	C
	Total Unmitigated Emissions	A + B + C = D
	BAAQMD Threshold	1,100 or 4.6 MT CO_2e/yr/SP
3	Unmitigated Emissions Exceed BAAQMD Threshold?	Is D > 1,100/4.6? (If Yes, significant. Go to step 4. If No, less than significant)
4	Mitigated Emissions	E
5	Mitigated Emissions Exceed BAAQMD Threshold?	Is E > 1,100/4.6? (If Yes, significant and unavoidable. If No, less than significant with mitigation incorporated)

* Letters "A", "B", and "C" are used to represent numeric values that would be obtained through modeling for area and mobile sources, and by manual calculations for indirect source-emissions. "D" represents the sum of "A", "B", and "C" (i.e., unmitigated emissions). "E" represents mitigated emissions.

Notes: CO_2e = carbon dioxide equivalent; MT = metric tons; yr = year.
Refer to Appendix D for support documentation.

4.3. GREENHOUSE GAS REDUCTION STRATEGIES

The Air District encourages local governments to adopt a qualified GHG Reduction Strategy that is consistent with AB 32 goals. If a project is consistent with an adopted qualified GHG Reduction Strategy that meets the standards laid out below, it can be presumed that the project will not have significant GHG emission impacts. This approach is consistent with the State CEQA Guidelines, Section 15183.5 (see text in box below).

> *§15183.5. Tiering and Streamlining the Analysis of Greenhouse Gas Emissions.*
>
> *(a) Lead agencies may analyze and mitigate the significant effects of greenhouse gas emissions at a programmatic level, such as in a general plan, a long range development plan, or a separate plan to reduce greenhouse gas emissions. Later project-specific environmental documents may tier from and/or incorporate by reference that existing programmatic review.*

Project-specific environmental documents may rely on an EIR containing a programmatic analysis of greenhouse gas emissions as provided in section 15152 (tiering), 15167 (staged EIRs) 15168 (program EIRs), 15175-15179.5 (Master EIRs), 15182 (EIRs Prepared for Specific Plans), and 15183 (EIRs Prepared for General Plans, Community Plans, or Zoning).

(b) Plans for the Reduction of Greenhouse Gas Emissions. Public agencies may choose to analyze and mitigate significant greenhouse gas emissions in a plan for the reduction of greenhouse gas emissions or similar document. A plan to reduce greenhouse gas emissions may be used in a cumulative impacts analysis as set forth below. Pursuant to sections 15064(h)(3) and 15130(d), a lead agency may determine that a project's incremental contribution to a cumulative effect is not cumulatively considerable if the project complies with the requirements in a previously adopted plan or mitigation program under specified circumstances.

(1) Plan Elements. A plan for the reduction of greenhouse gas emissions should:

(A) Quantify greenhouse gas emissions, both existing and projected over a specified time period, resulting from activities within a defined geographic area;

(B) Establish a level, based on substantial evidence, below which the contribution to greenhouse gas emissions from activities covered by the plan would not be cumulatively considerable;

(C) Identify and analyze the greenhouse gas emissions resulting from specific actions or categories of actions anticipated within the geographic area;

(D) Specify measures or a group of measures, including performance standards, that substantial evidence demonstrates, if implemented on a project-by-project basis, would collectively achieve the specified emissions level;

(E) Establish a mechanism to monitor the plan's progress toward achieving the level and to require amendment if the plan is not achieving specified levels;

(F) Be adopted in a public process following environmental review

(2) Use with Later Activities. A plan for the reduction of greenhouse gas emissions, once adopted following certification of an EIR or adoption of an environmental document, may be used in the cumulative impacts analysis of later projects. An environmental document that relies on a greenhouse gas reduction plan for a cumulative impacts analysis must identify those requirements specified in the plan that apply to the project, and, if those requirements are not otherwise binding and enforceable, incorporate those requirements as mitigation measures applicable to the project. If there is substantial evidence that the effects of a particular project may be cumulatively considerable notwithstanding the project's compliance with the specified requirements in the plan for the reduction of greenhouse gas emissions, an EIR must be prepared for the project.

Standard Elements of a GHG Reduction Strategy

The Air District recommends the Plan Elements in the state CEQA Guidelines as the minimum standard to meet the GHG Reduction Strategy Thresholds of Significance option. A GHG Reduction Strategy may be one single plan, such as a general plan or climate action plan, or could be comprised of a collection of climate action policies, ordinances and programs that have been legislatively adopted by a local jurisdiction. The GHG Reduction Strategy should identify goals, policies and implementation measures that would achieve AB 32 goals for the entire community. Plans with horizon years beyond 2020 should consider continuing the downward

reduction path set by AB 32 and move toward climate stabilization goals established in Executive Order S-3-05.

To meet this threshold of significance, a GHG Reduction Strategy must include the following elements (corresponding to the State CEQA Guidelines Plan Elements):

(A) Quantify greenhouse gas emissions, both existing and projected over a specified time period, resulting from activities within a defined geographic area.

A GHG Reduction Strategy must include an emissions inventory that quantifies an existing baseline level of emissions and projected GHG emissions from a business-as-usual, no-plan, forecast scenario of the horizon year. The baseline year is based on the existing growth pattern defined by an existing general plan. The projected GHG emissions are based on the emissions from the existing growth pattern or general plan through to 2020, and if different, the year used for the forecast. If the forecast year is beyond 2020, BAAQMD recommends doing a forecast for 2020 to establish a trend. The forecast does not include new growth estimates based on a new or draft general plan.

When conducting the baseline emissions inventory and forecast, ARB's business-as-usual 2020 forecasting methodology should be followed to the extent possible, including the following recommended methodology and assumptions:

- The baseline inventory should include one complete calendar year of data for 2008 or earlier. CO_2 must be inventoried across all sectors (residential, commercial, industrial, transportation and waste); accounting of CH_4, N_20, SF6, HFC and PFC emission sources can also be included where reliable estimation methodologies and data are available.

- Business-as-usual emissions are projected in the absence of any policies or actions that would reduce emissions. The forecast should include only adopted and funded projects.

- The business-as-usual forecast should project emissions from the baseline year using growth factors specific to each of the different economic sectors: Recommendations for growth factors are included in the Air District's GHG Quantification Guidance document (explained below and available on the District's website).

The Air District's *GHG Plan Level Reduction Strategy Guidance* contains detailed recommendations for developing GHG emission inventories and projections and for quantifying emission reductions from policies and mitigation measures. This document is available at the Air District's website, http://www.baaqmd.gov/Divisions/Planning-and-Research/CEQA-GUIDELINES.aspx.

(B) Establish a level, based on substantial evidence, below which the contribution to GHG emissions from activities covered by the plan would not be cumulatively considerable.

A GHG Reduction Strategy must establish a target that is adopted by legislation that meets or exceeds one of the following options, all based on AB 32 goals:

- Reduce emissions to 1990 level by 2020[1]
- Reduce emissions 15 percent below baseline (2008 or earlier) emission level by 2020[2]
- Meet the plan efficiency threshold of 6.6 MT CO_2e/service population/year

If the target year for a GHG reduction goal exceeds 2020, then the GHG emission reduction target should be in line with the goals outlined in Executive Order S-3-05.

(C) Identify and analyze the GHG emissions resulting from specific actions or categories of actions anticipated within the geographic area.

A Strategy should identify and analyze GHG reductions from anticipated actions in order to understand the amount of reductions needed to meet its target. Anticipated actions refer to local and state policies and regulations that may be planned or adopted but not implemented. For example, ARB's Scoping Plan contains a number of measures that are planned but not yet implemented. BAAQMD recommends for the Strategy to include an additional forecast analyzing anticipated actions. Element (C), together with (A), is meant to identify the scope of GHG emissions to be reduced through Element (D).

(D) Specify measures or a group of measures, including performance standards that substantial evidence demonstrates, if implemented on a project-by-project basis, would collectively achieve the specified emissions level.

The GHG Reduction Strategy should include mandatory and enforceable measures that impact new development projects, such as mandatory energy efficiency standards, density requirements, etc. These measures may exist in codes or other policies and may be included in the Strategy by reference.

The GHG Reduction Strategy should include quantification of expected GHG reductions from each identified measure or categories of measures (such as residential energy efficiency measures, bike/pedestrian measures, recycling measures, etc.), including disclosure of calculation methods and assumptions. Quantification should reflect annual GHG reductions and demonstrate how the GHG reduction target will be met. The Strategy should specify which measures apply to new development projects.

(E) Monitor the plan's progress

To ensure that all new development projects are incorporating all applicable measures contained within the GHG Reduction Strategy, the Strategy should include an Implementation Plan containing the following:

- Identification of which measures apply to different types of new development projects, discerning between voluntary and mandatory measures.
- Mechanism for reviewing and determining if all applicable mandatory measures are being adequately applied to new development projects.
- Identification of implementation steps and parties responsible for ensuring implementation of each action.

[1] Specified target in AB 32 legislation

[2] From "Climate Change Scoping Plan", Executive Summary page 5

- Schedule of implementation identifying near-term and longer-term implementation steps.

- Procedures for monitoring and updating the GHG inventory and reduction measures every 3-5 years before 2020 and submitting annual implementation updates to the jurisdiction's governing body.

- Annual review and reporting on the progress of implementation of individual measures, including assessment of how new development projects have been incorporating Strategy measures. Review should also include an assessment of the implementation of Scoping Plan measures in order to determine if adjustments to local Strategy must be made to account for any shortfalls in Scoping Plan implementation.

(F) Adopt the GHG Reduction Strategy in a public process following environmental review

A GHG Reduction Strategy should undergo an environmental review which may include a negative declaration or EIR.

If the GHG Reduction Strategy consists of a number of different elements, such as a general plan, a climate action plan and/or separate codes, ordinances and policies, each element that is applicable to new development projects would have to complete an environmental review in order to allow tiering for new development projects.

Sustainable Communities Strategy (SCS) or Alternative Planning Strategy

If a project is located within an adopted Sustainable Communities Strategy or Alternative Planning Strategy, the GHG emissions from cars and light duty trucks do not need to be analyzed in the environmental analysis. This approach is consistent with the State CEQA Guidelines, Section 15183.5(c). This approach only applies to certain residential and mixed use projects and transit priority projects as defined in Section 21155 of the State CEQA Guidelines.

Section 15183.5(c): Special Situations. As provided in Public Resources Code sections 21155.2 and 21159.28, environmental documents for certain residential and mixed us projects, and transit priority projects, as defined in section 21155, that are consistent with the general use designation, density, building intensity, and applicable policies specified for the project area in an applicable sustainable communities strategy or alternative planning strategy need not analyze global

warming impacts resulting from cars and light duty trucks. A lead agency should consider whether such projects may result in GHG emissions resulting from other source, however, consistent with these Guidelines.

Section 21155: A transit priority project shall (1) contain at least 50 percent residential use, based on total building square footage and, if the project contains between 26 percent and 50 percent nonresidential uses, a floor area ratio of not less than 0.75; (2) provide a minimum net density of at least 20 dwelling units per acre; and (3) be within one-half mile of a major transit stop or high-quality transit corridor included in a regional transportation plan. A major transit stop is as defined in Section 21064.3, except that, for purposes of this section, it also includes major transit stops that are included in the applicable regional transportation plan. For purposes of this section, a high quality transit corridor means a corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours. A project shall be considered to be within on-half mile of a major transit stop or high-quality transit corridor if all parcels within the project have not more than 25 percent of their area farther than one-half mile from the stop or corridor and if not more than 10 percent of the residential units or 100 units, whichever is less, in the project are farther than one-half mile from the stop or corridor.

4.4. MITIGATING OPERATIONAL-RELATED IMPACTS

The following mitigation measures would reduce operational-related emissions of criteria air pollutants, precursors, and GHGs from mobile, area, and stationary sources. Additional mitigation measures may be used, including off-site measures, provided their mitigation efficiency is justified. Where a range of emission reduction potential is given for a measure, the Lead Agency should provide justification for the mitigation reduction efficiency assumed for the project. If mitigation does not bring a project back within the threshold requirements, the project could be cumulatively significant and could be approved only with a Statement of Overriding Considerations and a showing that all feasible mitigation measures have been implemented.

Reductions from mitigation measures should be scaled proportionally to their sector of project-generated emissions. For example, if a measure would result in a 50 percent reduction in residential natural gas consumption, but only 20 percent of a project's emissions are associated with natural gas consumption, and only 10 percent of a project's emissions are from residential land uses, then the scaled reduction would equal one percent (50% * 20% * 10% = 1%).

Once all emission reductions are scaled by their applicable sector and land use, they should be added together for the total sum of emission reductions. Once all emission reductions are scaled by their applicable sector and land use, they should be added together for the total sum of emission reductions.

The Air District prefers for project emissions to be reduced to their extent possible onsite. For projects that are not able to mitigate onsite to a level below significance, offsite mitigation measures serve as a feasible alternative. Recent State's CEQA Guidelines amendments allow for offsite measures to mitigate a project's emissions, (Section 15126.4(c)(4)).

In implementing offsite mitigation measures, the lead agency must ensure that emission reductions from identified projects are real, permanent through the duration of the project, enforceable, and are equal to the pollutant type and amount of the project impact being offset. BAAQMD recommends that offsite mitigation projects occur within the nine-county Bay Area in order to reduce localized impacts and capture potential co-benefits. Offsite mitigation for PM and toxics emission reductions should occur within a five mile radius to the project site.

Another feasible mitigation measure the Air District is exploring establishing is an offsite mitigation program to assist lead agencies and project applicants in achieving emission reductions. A project applicant would enter into an agreement with the Air District and pay into an Air District fund. The Air District would commit to reducing the type and amount of emission indentified in the agreement. The Air District would identify, implement, and manage offsite mitigation projects.

The following tables list feasible mitigation measures for consideration in projects. The estimated emission reductions are a work in progress and the Air District will continue to improve guidance on quantifying the mitigation measures.

URBEMIS Mitigation Measures for Operational Mobile Source Emissions

Measure	Sector Reductions	Applicable Pollutants	Sector	Notes	Additional comments
Mix of Uses	-3% to 9%	CAPs, GHGs	Mobile sources	-3 when no housing or employment centers within 1/2 mile	Residential: % reduction is taken from base trips (9.57) and subtracted from ITE trip generation; Nonresidential: % reduction from ITE trip generation
Local serving retail within 1/2 mile of project	2%	CAPs, GHGs	Mobile sources	Uses lower end of reported research to avoid double counting with mix of uses measure	
Transit Service	0% to 15%	CAPs, GHGs	Mobile sources		
Bike & Pedestrian	0%–9%	CAPs, GHGs	Mobile sources	Credit is given based on intersection density, sidewalk completeness, and bike network completeness; No reduction if entire area within 1/2 mile is single use	
Affordable Housing	0%–4%	CAPs, GHGs	Mobile sources		
Transportation Demand Management Parking, Transit Passes					
Daily Parking Charge	0%–25%	CAPs, GHGs	Only resident/ employee trips, no visitor/ shopper trips		
Parking Cash-Out	0%–12.5%	CAPs, GHGs		Shoup, Donald. 2005. Parking Cash Out. American Planning Association. Chicago, IL.	
Free Transit Passes	25% of Transit Service Reduction	CAPs, GHGs			
Telecommuting					
Employee Telecommuting Program	1%–100%	CAPs, GHGs	Mobile sources, Worker Trips only		
Compressed Work Schedule 3/36	1%–40%	CAPs, GHGs			
Compressed Work Schedule 4/40	1%–20%	CAPs, GHGs			
Compressed Work Schedule 9/80	1%–10%	CAPs, GHGs			

URBEMIS Mitigation Measures for Operational Mobile Source Emissions

Measure	Sector Reductions	Applicable Pollutants	Sector	Notes	Additional comments
Other Transportation Demand Measures					
Secure Bike Parking (at least 1 space per 20 vehicle spaces)	At least 3 elements: 1% reduction, plus 5% of the reduction for transit and pedestrian/bike friendliness; At least 5 elements: 2% reduction, plus 10% of the reduction for transit and pedestrian/bike friendliness	CAPs, GHGs	Mobile sources, Worker Trips only		
Showers/Changing Facilities Provided					
Guaranteed Ride Home Program Provided					
Car-Sharing Services Provided					
Information Provided on Transportation Alternatives (Bike Schedules, Maps)					
Dedicated Employee Transportation Coordinator					
Carpool Matching Program					
Preferential Carpool/Vanpool Parking					
Parking Supply	0%–50%	CAPs, GHGs	Mobile sources		
On Road Trucks	As input by user in URBEMIS	CAPs, GHGs	Mobile sources		

URBEMIS Mitigation Measures for Operational Area-Source Emissions

Measure	Sector Reductions	Applicable Pollutants	Sector	Notes
Increase Energy Efficiency Beyond Title 24	Same as % improvement over Title 24	CAPs, GHGs	Natural gas sector in URBEMIS for applicable land use only	User should specify baseline year for the Title 24 standards
Electrically powered landscape equipment and outdoor electrical outlets	Same as % of landscape equipment emissions	CAPs, GHGs	Landscape emissions: residential only	
Low VOC architectural coatings	Same as % VOC reduction in applicable coatings (Interior/Exterior)	ROG only	Architectural coating	

NON-URBEMIS Energy Efficiency Mitigation Measures

Measure	Sector Reductions	Applicable Pollutants	Sector	Notes	Additional comments
Plant shade trees within 40 feet of the south side or within 60 feet of the west sides of properties.	30%	GHGs	R,C A/C Electricity	USDA Forest Service, Pacific Northwest Research Station. "California Study Shows Shade Trees Reduce Summertime Electricity Use." Science Daily 7 January 2009. 20 February 2009 <http://www.sciencedaily.com/releases/2009/01/090105150831.htm>.	Electricity-related measures reduce CAPs off-site, but they are not typically quantified as part of a CEQA analysis.
Require cool roof materials (albedo >= 30)	34%	GHGs	C A/C Electricity	U.S. EPA Cool Roof Product Information, Available: <http://www.epa.gov/heatisland/resources/pdf/CoolRoofsCompendium.pdf>	
	69%	GHGs	R A/C Electricity		
Install green roofs	1%	GHGs	R,C A/C Electricity	Reductions are based on the Energy & Atmosphere credits (EA Credit 2) documented in the Leadership in Energy & Environmental Design (LEED), Green Building Rating System for New Constructions and Major Renovations, Version 2.2, October 2005. The reduction assumes that a vegetated roof is installed on a least 50% of the roof area or that a combination high albedo and vegetated roof surface is installed that meets the following standard: (Area of SRI Roof/0.75)+(Area of vegetated roof/0.5) >= Total Roof Area.	
Require smart meters and programmable thermostats	10%	CAPs, GHGs	R, C electricity and natural gas space heating	U. S. Environmental Protection Agency. 2009. Programmable Thermostat. http://www.energystar.gov/ia/new_homes/features/ProgThermostats1-17-01.pdf	

NON-URBEMIS Energy Efficiency Mitigation Measures

Measure	Sector Reductions	Applicable Pollutants	Sector	Notes	Additional comments
Meet GBC standards in all New construction	17%	GHGs	R electricity	California Energy Commission [CEC] 2007. Impact Analysis 2008 Update to the California Energy Efficiency Standards for Residential and Nonresidential Buildings	
	7%	GHGs	C electricity		
	9%	CAPs, GHGs	R natural gas		
	3%	CAPs, GHGs	C natural gas		
Retrofit existing buildings to meet CA GBC standards	38%	GHGs	R electricity	California Energy Commission [CEC] 2003. Impact Analysis 2005 Update to the California Energy Efficiency Standards for Residential and Nonresidential Buildings; California Energy Commission [CEC] 2007. Impact Analysis 2008 Update to the California Energy Efficiency Standards for Residential and Nonresidential Buildings	
	12%	GHGs	C electricity		
	18%	CAPs, GHGs	R natural gas		
	12%	CAPs, GHGs	C natural gas		
Install solar water heaters	70%	CAPs, GHGs	R natural gas water heating	Energy Star. 2009. Solar Water Heater. http://www.energystar.gov/ia/new_homes/features/WaterHtrs_062906.pdf; Department of Energy. California Energy Commission [CEC] 2007. Impact Analysis 2008 Update to the California Energy Efficiency Standards for Residential and Nonresidential Buildings	Cannot take credit for both solar and tank-less water heater measures
	70%	CAPs, GHGs	C natural gas water heating		
Install tank-less water heaters	35%	CAPs, GHGs	R natural gas water heating	Tankless Water Heater. 2008. Available: <http://www.eere.energy.gov/consumer/your_home/water_heating/index.cfm/mytopic=12820>	
	35%	CAPs, GHGs	C natural gas water heating		
Install solar panels on residential and commercial buildings	100%	GHGs	R, C electricity		

NON-URBEMIS Energy Efficiency Mitigation Measures

Measure	Sector Reductions	Applicable Pollutants	Sector	Notes	Additional comments
100% increase in diversity of land use mix	5%	CAPs, GHGs	Mobile sources	Ewing, Reid, et al. 2001. *Travel and the Built Environment: A Synthesis.* Transportation Research Record 1780. Paper No. 01-3515 as cited in Urban Land Institute. 2008. *Growing Cooler.* ISBN: 978-0-87420-082-2. Washington, DC	
Jobs housing balance	Trip reduction = (1 – (ABS (1.5 * HH – E)/(1.5 * HH + E)) – 0.25) / 0.25 * 0.03; where ABS = absolute value; HH = study area households ; E = study area employment	CAPs, GHGs	Mobile sources	*Nelson/Nygaard Consultants. 2005. Crediting Low-Traffic Developments: Adjusting Site-Level Vehicle Trip Generation Using URBEMIS. Pg 12, (adapted from Criterion and Fehr & Peers, 2001)*	
100% increase in design (i.e., presence of design guidelines for transit oriented development, complete streets standards)	3%	CAPs, GHGs	Mobile sources	Ewing, Reid, et al. 2001. *Travel and the Built Environment: A Synthesis.* Transportation Research Record 1780. Paper No. 01-3515 as cited in Urban Land Institute. 2008. *Growing Cooler.* ISBN: 978-0-87420-082-2. Washington, DC	

NON-URBEMIS Energy Efficiency Mitigation Measures

Measure	Sector Reductions	Applicable Pollutants	Sector	Notes	Additional comments
100% increase in density	5%	CAPs, GHGs	Mobile sources	Ewing, Reid, et al. 2001. *Travel and the Built Environment: A Synthesis.* Transportation Research Record 1780. Paper No. 01-3515 as cited in Urban Land Institute. 2008. *Growing Cooler.* ISBN: 978-0-87420-082-2. Washington, DC	
HVAC duct sealing	30%	GHGs	R,C A/C electricity	Sacramento Metropolitan Utilities District. 2008. Duct Sealing. Available: <http://www.pge.com/myhome/saveenergymoney/rebates/coolheat/duct/index.shtml>.	
Provide necessary infrastructure and treatment to allow use of 50% greywater/ recycled water in residential and commercial uses for outdoor irrigation	SFR: 74%*50% = 37.5% MFR: 58% * 50% = 29% Commercial: 12% * 50% = 6%	GHGs	R electricity (water consumption) C electricity (water consumption)	Department of Water Resources. 2001. Statewide Indoor/Outdoor Split. Accessed December 2, 2008. Available at: <http://www.landwateruse.water.ca.gov/annualdata/urbanwateruse/2001/landuselevels.cfm?use=8>.	
Complete streets (i.e., bike lanes and pedestrian sidewalks on both sides of streets, traffic calming features such as pedestrian bulb-outs, cross-walks, traffic circles, and elimination of physical and psychological barriers (e.g., sound walls and large arterial roadways, respectively).)	1-5%	CAPs, GHGs	Mobile sources	Dierkers, G., E. Silsbe, S. Stott, S. Winkelman, an M. Wubben. 2007. *CCAP Transportation Emissions Guidebook*. Center for Clean Air Policy. Washington, D.C. Available: <http://www.ccap.org/safe/guidebook.php>. as cited in California Air Pollution Control Officers Association (CAPCOA) 2008. *CEQA and Climate Change*.	

NON-URBEMIS Energy Efficiency Mitigation Measures					
Measure	Sector Reductions	Applicable Pollutants	Sector	Notes	Additional comments
Maximize interior day light		GHGs	R, C, M		
Increase roof/ceiling insulation		CAPs, GHGs	R, C, M		
Create program to encourage efficiency improvements in rental units		CAPs, GHGs	R		
Install rainwater collection systems in residential and Commercial Buildings		GHGs	R,C,M		
Install low-water use appliances and fixtures		GHGs	R,C,M	California Air Pollution Control Officers Association (CAPCOA) 2008. CEQA and Climate Change.	
Restrict the use of water for cleaning outdoor surfaces/Prohibit systems that apply water to non-vegetated surfaces		GHGs	R,C,M	California Attorney General's Office GHG Reduction Measures	
Implement water-sensitive urban design practices in new construction		GHGs	R,C,M		
NON-URBEMIS Waste Reduction Mitigation Measures					
Provide composting facilities at residential uses		GHGs	R		
Create food waste and green waste curb-side pickup service		GHGs	R,C,M		
Require the provision of storage areas for recyclables and green waste in new construction		GHGs	R,C,M		
Notes: CAPs = Criteria Air Pollutants; GHGs = Greenhouse Gases; ROG = Reactive Organic Gases; R = Residential Development; C = Commercial Development; M = Mixed Use Development; A/C = Air Conditioning; and VOC = Volatile Organic Compounds. Source: Information compiled by EDAW 2009.					

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5. LOCAL COMMUNITY RISK AND HAZARD IMPACTS[3]

The purpose of this Chapter is (1) to recommend methods whereby local community risk and hazard impacts from projects for both new sources and new receptors can be determined based on comparison with applicable thresholds of significance and screening criteria and (2) to recommend mitigation measures for these impacts. This chapter contains the following sections:

Section 5.2 – Presents methods for assessing single-source impacts from either an individual new source or impacts on new receptors from existing individual sources.

Section 5.3 – Discusses methods for assessing cumulative impacts from multiple sources.

Section 5.4 – Discusses methods for mitigating local community risk and hazard impacts.

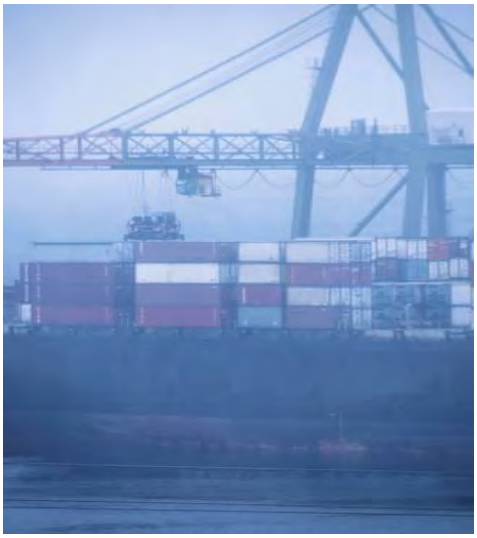
The recommendations provided in this chapter apply to assessing and mitigating impacts for project-level impacts and related cumulative impacts. Refer to Chapter 9 for recommendations for assessing and mitigating local community risk and hazard impacts at the plan-level.

To assist the Lead Agency in evaluating air quality impacts at the neighborhood scale, *Thresholds of Significance* have been established for local community risks and hazards associated with TACs and $PM_{2.5}$ with respect to siting a new source and/or receptor; as well as for assessing both individual source and cumulative multiple source impacts. These *Thresholds of Significance* focus on $PM_{2.5}$ and TACs because these more so than other emission types pose significant health impacts at the local level as discussed separately below.

5.1. TOXIC AIR CONTAMINANTS

TACs are a defined set of airborne pollutants that may pose a present or potential hazard to human health. A wide range of sources, from industrial plants to motor vehicles, emit TACs. Like $PM_{2.5}$, TAC can be emitted directly and can also be formed in the atmosphere through reactions among different pollutants. The methods presented in this Chapter for assessing local community risk and hazard impacts only include direct TAC emissions, not those formed in the atmosphere.

The health effects associated with TACs are quite diverse and generally are assessed locally, rather than regionally. TACs can cause long-term health effects such as cancer, birth defects, neurological damage, asthma, bronchitis or genetic damage; or short-term acute affects such as eye watering, respiratory irritation (a cough), running nose, throat pain, and headaches. For evaluation purposes, TACs are separated into carcinogens and non-carcinogens based on the nature of the physiological effects associated with exposure to the pollutant. Carcinogens are assumed to have no safe threshold below which health impacts would not occur, and cancer risk is expressed as excess cancer cases per one million exposed individuals, typically over a lifetime of exposure. Non-carcinogenic substances differ in that there is generally assumed to



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[3] The use of the receptor thresholds is discussed in section 2.8 of these Guidelines

be a safe level of exposure below which no negative health impact is believed to occur. These levels are determined on a pollutant-by-pollutant basis. Acute and chronic exposure to non-carcinogens is expressed as a hazard index (HI), which is the ratio of expected exposure levels to an acceptable reference exposure levels.

TACs are primarily regulated through State and local risk management programs. These programs are designed to eliminate, avoid, or minimize the risk of adverse health effects from exposures to TACs. A chemical becomes a regulated TAC in California based on designation by the California Office of Environmental Health Hazard Assessment (OEHHA). As part of its jurisdiction under Air Toxics Hot Spots Program (Health and Safety Code Section 44360(b)(2)), OEHHA derives cancer potencies and reference exposure levels (RELs) for individual air contaminants based on the current scientific knowledge that includes consideration of possible differential effects on the health of infants, children and other sensitive subpopulations, in accordance with the mandate of the Children's Environmental Health Protection Act (Senate Bill 25, Escutia, Chapter 731, Statutes of 1999, Health and Safety Code Sections 39669.5 et seq.). The methodology in this Chapter reflects the approach adopted by OEHHA in May 2009, which considers age sensitivity factors to account for early life stage exposures. The specific toxicity values of each particular TAC as identified by OEHHA are listed in BAAQMD's Regulation 2, Rule 5: New Source Review of Toxic Air Contaminants.

5.1.1. Fine Particulate Matter

$PM_{2.5}$ is a complex mixture of substances that includes elements such as carbon and metals; compounds such as nitrates, organics, and sulfates; and complex mixtures such as diesel exhaust and wood smoke. $PM_{2.5}$ can be emitted directly and can also be formed in the atmosphere through reactions among different pollutants. The methods presented in this Chapter for assessing local community risk and hazard impacts only include direct $PM_{2.5}$ emissions, not those formed in the atmosphere.

Compelling evidence suggests that $PM_{2.5}$ is by far the most harmful air pollutant in the SFBAAB in terms of the associated impact on public health. A large body of scientific evidence indicates that both long-term and short-term exposure to $PM_{2.5}$ can cause a wide range of health effects (e.g., aggravating asthma and bronchitis, causing visits to the hospital for respiratory and cardio-vascular symptoms, and contributing to heart attacks and deaths). BAAQMD recommends characterizing potential health effects from exposure to directly $PM_{2.5}$ emissions through comparison to the applicable *Thresholds of Significance*.

5.1.2. Common Source Types

Common stationary source types of TAC and $PM_{2.5}$ emissions include gasoline stations, dry cleaners, and diesel backup generators, which are subject to BAAQMD permit requirements. The other, often more significant, common source type is on-road motor vehicles on freeways and roads such as trucks and cars, and off-road sources such as construction equipment, ships and trains. Because these common sources are prevalent in many communities, this Chapter focuses on screening tools for the evaluation of associated cumulative community risk and hazard impacts. However, it is important to note that other influential source types do exist (e.g., ports, railyards, and truck distribution centers), but these are often more complex and require more advanced modeling techniques beyond those discussed herein.

5.1.3. Area of Influence

For assessing community risks and hazards, a 1,000 foot radius is recommended around the project property boundary. BAAQMD recommends that any proposed project that includes the siting of a new source or receptor assess associated impacts within 1,000 feet, taking into account both individual and nearby cumulative sources (i.e., proposed project plus existing and foreseeable future projects). Cumulative sources represent the combined total risk values of each

individual source within the 1,000-foot evaluation zone. A lead agency should enlarge the 1,000-foot radius on a case-by-case basis if an unusually large source or sources of risk or hazard emissions that may affect a proposed project is beyond the recommended radius.

The recommended methodology for assessing community risks and hazards from $PM_{2.5}$ and TACs follows a phased approach. Within this approach, more advanced techniques, for both new sources and receptors, which require additional site specific information are presented for each progressive phase to assess risks and hazards. Each phase provides concentrations and risks that are directly comparable to the applicable *Thresholds of Significance*, although it is important to note that the use of more site specific modeling input data produces more accurate results. Also, progression from one phase to the next in a sequential fashion is not necessary and a refined modeling analysis can be conducted at any time.

5.1.4. Impacted Communities

In the Bay Area, there are a number of urban or industrialized communities where the exposure to TACs is relatively high in comparison to others. These same communities are often faced with other environmental and socio-economic hardships that further stress their residents and result in poor health outcomes. To address community risk from air toxics, the Air District initiated the Community Air Risk Evaluation (CARE) program in 2004 to identify locations with high levels of risk from TACs co-located with sensitive populations and use the information to help focus mitigation measures. Through the CARE program, the Air District developed an inventory of TAC emissions for 2005 and compiled demographic and heath indicator data. According to the findings of the CARE Program, diesel PM, mostly from on and off-road mobile sources, accounts for over 80 percent of the inhalation cancer risk from TACs in the Bay Area. Figure 5-1 shows the impacted communities as of November 2009, including: the urban core areas of Concord, eastern San Francisco, western Alameda County, Redwood City/East Palo Alto, Richmond/San Pablo, and San Jose. For more information on, and possible revisions to, impacted communities, go to the CARE Program website.

In many cases, air quality conditions in impacted communities result in part from land use and transportation decisions made over many years. BAAQMD believes comprehensive, community-wide strategies will achieve the greatest reductions in emissions of and exposure to TAC and $PM_{2.5}$. BAAQMD strongly recommends that within these impacted areas local jurisdictions develop and adopt Community Risk Reduction Plans, described in Section 5.4. The goal of the Community Risk Reduction Plan is to encourage local jurisdictions to take a proactive approach to reduce the overall exposure to TAC and $PM_{2.5}$ emissions and concentrations from new and existing sources. Local plans may also be developed in other areas to address air quality impacts related to land use decisions and ensure sufficient health protection in the community.

5.2. SINGLE SOURCE IMPACTS

5.2.1. Significance Determination

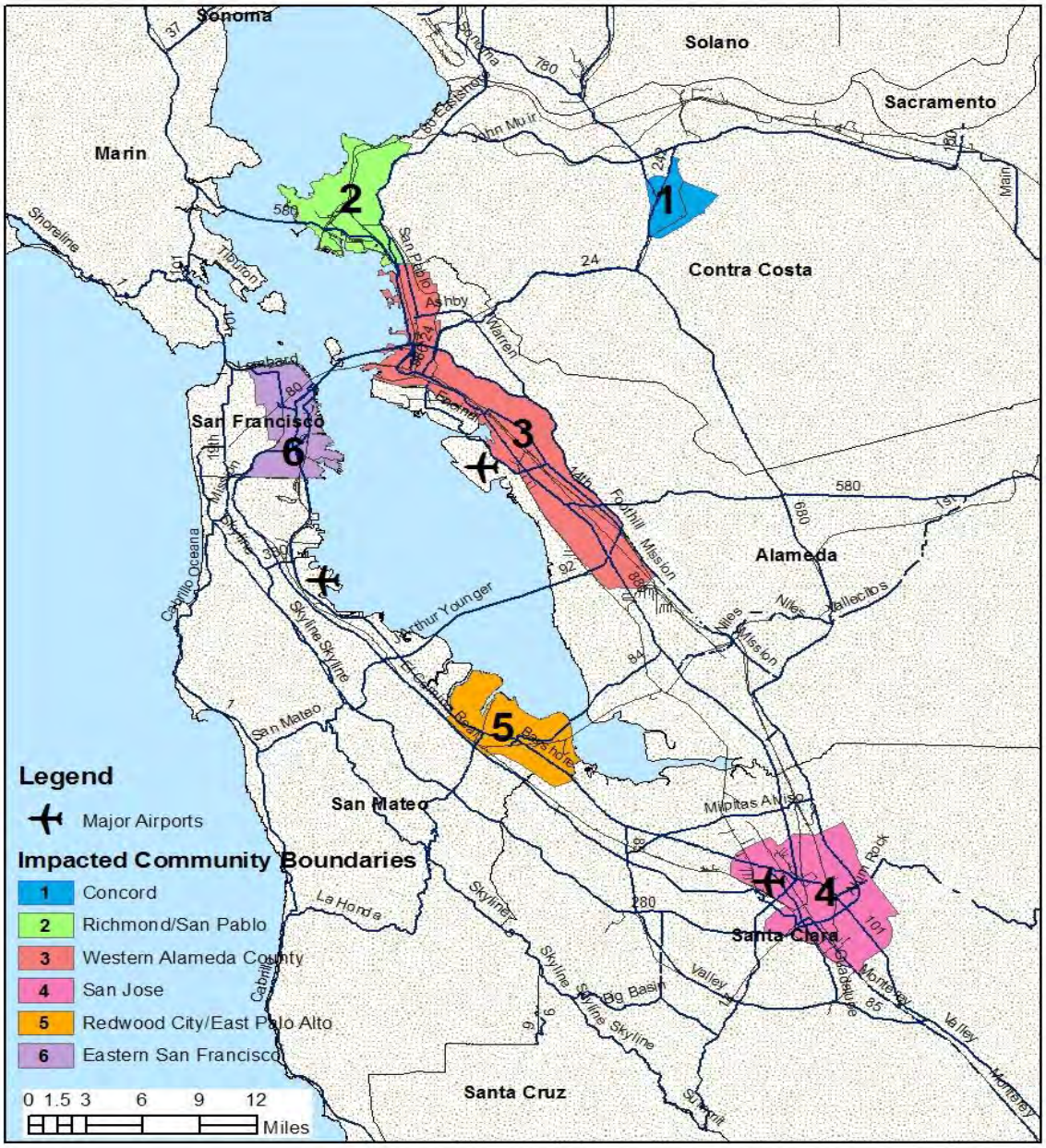
The Lead Agency shall determine whether operational-related TAC and $PM_{2.5}$ emissions generated as part of a proposed project siting a new source or receptor would expose existing or new receptors to levels that exceed BAAQMD's applicable *Thresholds of Significance* stated below:

- Compliance with a qualified Community Risk Reduction Plan;
- An excess cancer risk level of more than 10 in one million, or a non-cancer (i.e., chronic or acute) risk greater than 1.0 HI from a single source would be a significant cumulatively considerable contribution;

- An incremental increase of greater than 0.3 µg/m^3 annual average $PM_{2.5}$ from a single source would be a significant cumulatively considerable contribution.

In all areas, but especially within impacted communities identified under BAAQMD's CARE program, the Lead Agency is encouraged to develop and adopt a Community Risk Reduction Plan. To determine whether an impacted community is located in a jurisdiction, the Lead Agency should refer to Figure 5-1 and the BAAQMD CARE web page at http://www.baaqmd.gov/CARE/. Please consult with BAAQMD if a more precise map is needed.

Impacted Communities **Figure 5-1**



Source: BAAQMD 2009

Exposure of receptors to substantial concentrations of TACs and $PM_{2.5}$ could occur from the following situations:

1. Siting a new TAC and/or $PM_{2.5}$ source (e.g., diesel generator, truck distribution center, freeway) near existing or planned receptors; and
2. Siting a new receptor near an existing source of TAC and/or $PM_{2.5}$ emissions.

BAAQMD recommendations for evaluating and making a significance determination for each of these situations are discussed separately below.

5.2.2. Siting a New Source

When evaluating whether a new source of TAC and/or $PM_{2.5}$ emissions would adversely affect existing or future proposed receptors, a Lead Agency shall examine:

- the extent to which the new source would increase risk levels, hazard index, and/or $PM_{2.5}$ concentrations at nearby receptors,
- whether the source would be permitted or non-permitted by the BAAQMD, and
- whether the project would implement Best Available Control Technology for Toxics (T-BACT), as determined by BAAQMD.

The incremental increase in cancer and non-cancer (chronic and acute) risk from TACs and $PM_{2.5}$ concentrations at the affected receptors shall be assessed. As described above, the recommended methodology for assessing community risks and hazards from $PM_{2.5}$ and TACs follows a phased approach, within which progressively more advanced techniques are presented for each phase (Figure 5-2). Each phase provides concentrations and risks that are directly comparable to the applicable *Thresholds of Significance*, although it is important to note that the use of more site specific modeling input data produces more accurate results. Also, progression from one phase to the next in a sequential fashion is not necessary and a refined modeling analysis can be conducted at any time.

For siting a new source, the first step is to determine the associated emission levels.

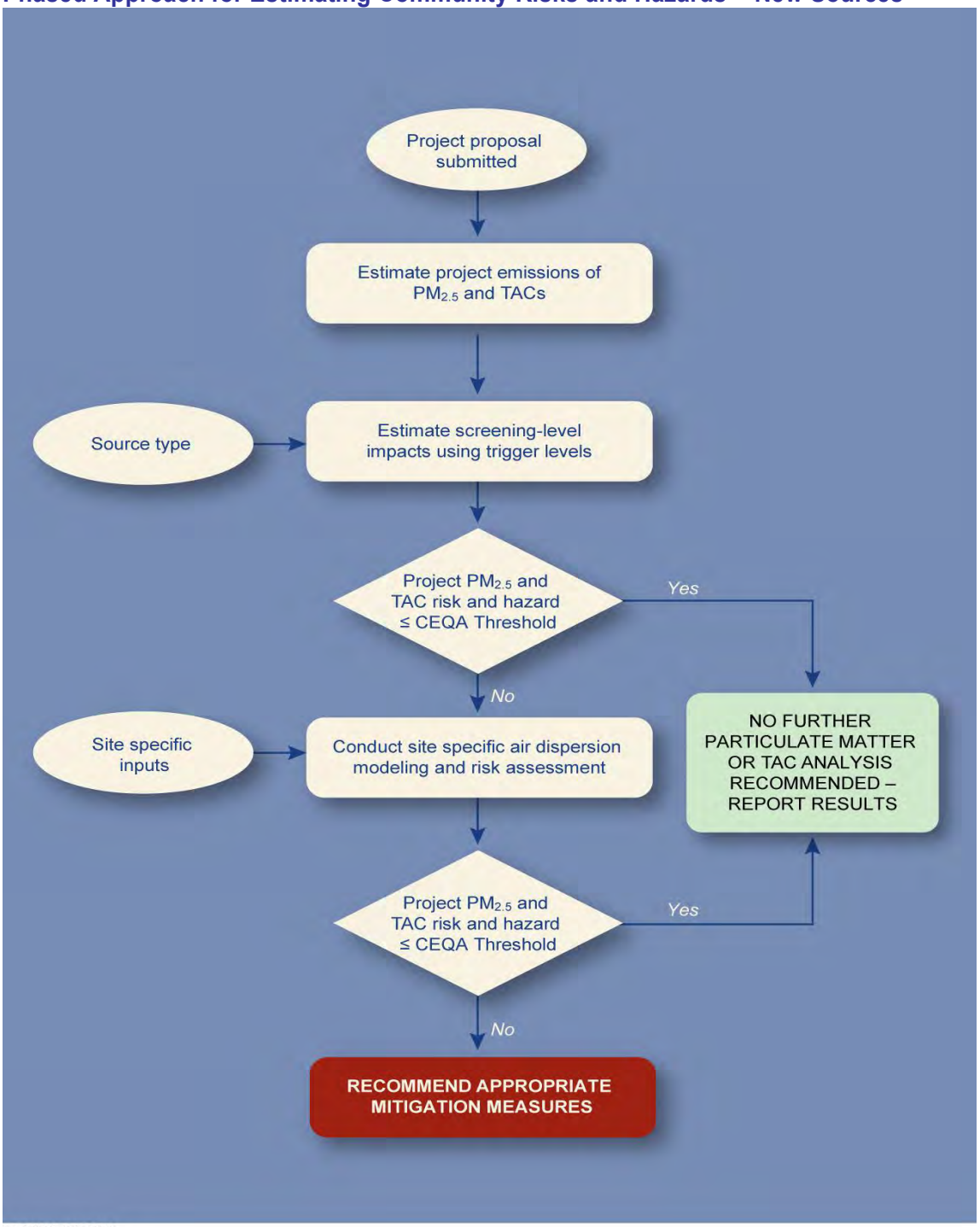
5.2.3. Sources Permitted by BAAQMD

For sources that would be permitted by BAAQMD (e.g., gas stations and back-up diesel generators) the project's type, size, or planned level of use can be used to help estimate $PM_{2.5}$ and TAC emissions. Screening or modeling conducted as part of the permit application can be used to determine cancer and non-cancer risk and $PM_{2.5}$ concentrations for comparing to the applicable *Thresholds of Significance*. BAAQMD can assist in determining the level of emissions associated with the new source. A Lead Agency should identify the maximally exposed existing or reasonably foreseeable future receptor.

Requirements of Toxics New Source Review (Regulation 2, Rule 5) will determine whether the project would implement T-BACT.

Figure 5-2

Phased Approach for Estimating Community Risks and Hazards – New Sources



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Concentration estimates of $PM_{2.5}$ from screening or modeling should be compared with the *Threshold of Significance* for $PM_{2.5}$. If screening estimates determine $PM_{2.5}$ concentrations from the project would not exceed the *Threshold of Significance*, no further analysis is recommended (See Figure 5-2). If emissions would exceed the *Threshold of Significance*, more refined modeling or mitigation measures to offset emission can be considered.

5.2.4. Sources Not Requiring a BAAQMD Permit

Some proposed projects would include the operation of non-permitted sources of TAC and/or $PM_{2.5}$ emissions. For instance, projects that would attract high numbers of diesel-powered on-road trucks or use off-road diesel equipment on site, such as a distribution center, a quarry, or a manufacturing facility, would potentially expose existing or future planned receptors to substantial risk levels and/or health hazards.

For sources that would not require permits from BAAQMD (e.g., distribution centers and large retail centers) where emissions are primarily from mobile sources—the number and activity of vehicles and fleet information would be required. The latest version of the State of California's EMFAC model is recommended for estimating emissions from on-road vehicles; the OFFROAD model is recommended for estimating emissions from off-road vehicles. For these types of new sources (not permitted by BAAQMD) screening methods are not currently available and a more refined analysis is necessary.

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If modeling estimates for community risks and hazards determine that local levels associated with the proposed project meet the applicable *Thresholds of Significance*, no further analysis is recommended. More details on project screening and recommended protocols for modeling stationary and mobile sources are presented in *Recommended Methods for Screening and Modeling Local Risks and Hazards*. This online companion document provides screening tables for emissions from on-road cars and trucks on major roadways and many existing permitted sources in the SFBAAB. It describes how to use screening tables to determine whether a site specific modeling analysis and risk assessment is required. The document also addresses sources that BAAQMD has determined to have negligible impact on health outcomes. It describes the recommended methodology for performing dispersion modeling and estimating emission factors if the project exceeds the thresholds based on the screening analysis; it describes how to calculate the potential cancer risk using age-sensitivity toxicity factors from the concentrations produced from the air modeling analysis; and it provides a sample calculation and the methodology for estimating short term, acute exposures and long term, chronic health impacts. The recommended protocols are consistent with the most current risk assessment methodology used for the BAAQMD's *New Source Review for Toxic Air Contaminants Regulation 2, Rule 5: Toxics New Source Review* and, with few exceptions, follows the California Air Pollution Control Officers Association's (CAPCOA) *Health Risk Assessments for Proposed Land Use Projects* (July 2009).

BAAQMD recommends that all receptors located within a 1,000 foot radius of the project's fence line be assessed for potentially significant impacts from the incremental increase in risks or hazards from the proposed new source. A lead agency should enlarge the 1,000-foot radius on a case-by-case basis if an unusually large source or sources of risk or hazard emissions that may affect a proposed project is beyond the recommended radius.

For new land uses that would host a high number of non-permitted TAC sources, such as a distribution center, the incremental increase in cancer risk shall be determined by an HRA using an acceptable air dispersion model in accordance with BAAQMD's *Recommended Methods for Screening and Modeling Local Risks and Hazards* and/or CAPCOA's guidance document titled *Health Risk Assessments for Proposed Land Use Projects*. A Lead Agency may consult HRAs that have previously been conducted for similar land uses to determine whether it assesses the incremental increase in cancer risk qualitatively or by performing an HRA. This analysis shall account for all TAC and PM emissions generated on the project site, as well as any TAC emissions that would occur near the site as a result of the implementation of the project (e.g., diesel trucks queuing outside an entrance, a high volume of trucks using a road to access a quarry or landfill).

Some proposed projects would include both permitted and non-permitted TAC sources. For instance, a manufacturing facility may include some permitted stationary sources and also attract a high volume of diesel trucks and/or include a rail yard. All sources should be accounted for in the analysis.

5.2.5. Siting a New Receptor[4]

If a project is likely to be a place where people live, play, or convalesce, it should be considered a receptor. It should also be considered a receptor if sensitive individuals are likely to spend a significant amount of time there. Sensitive individuals refer to those segments of the population most susceptible to poor air quality: children, the elderly, and those with pre-existing serious health problems affected by air quality (ARB 2005). Examples of receptors include residences, schools and school yards, parks and play grounds, daycare centers, nursing homes, and medical facilities. Residences can include houses, apartments, and senior living complexes. Medical facilities can include hospitals, convalescent homes, and health clinics. Playgrounds could be play areas associated with parks or community centers.

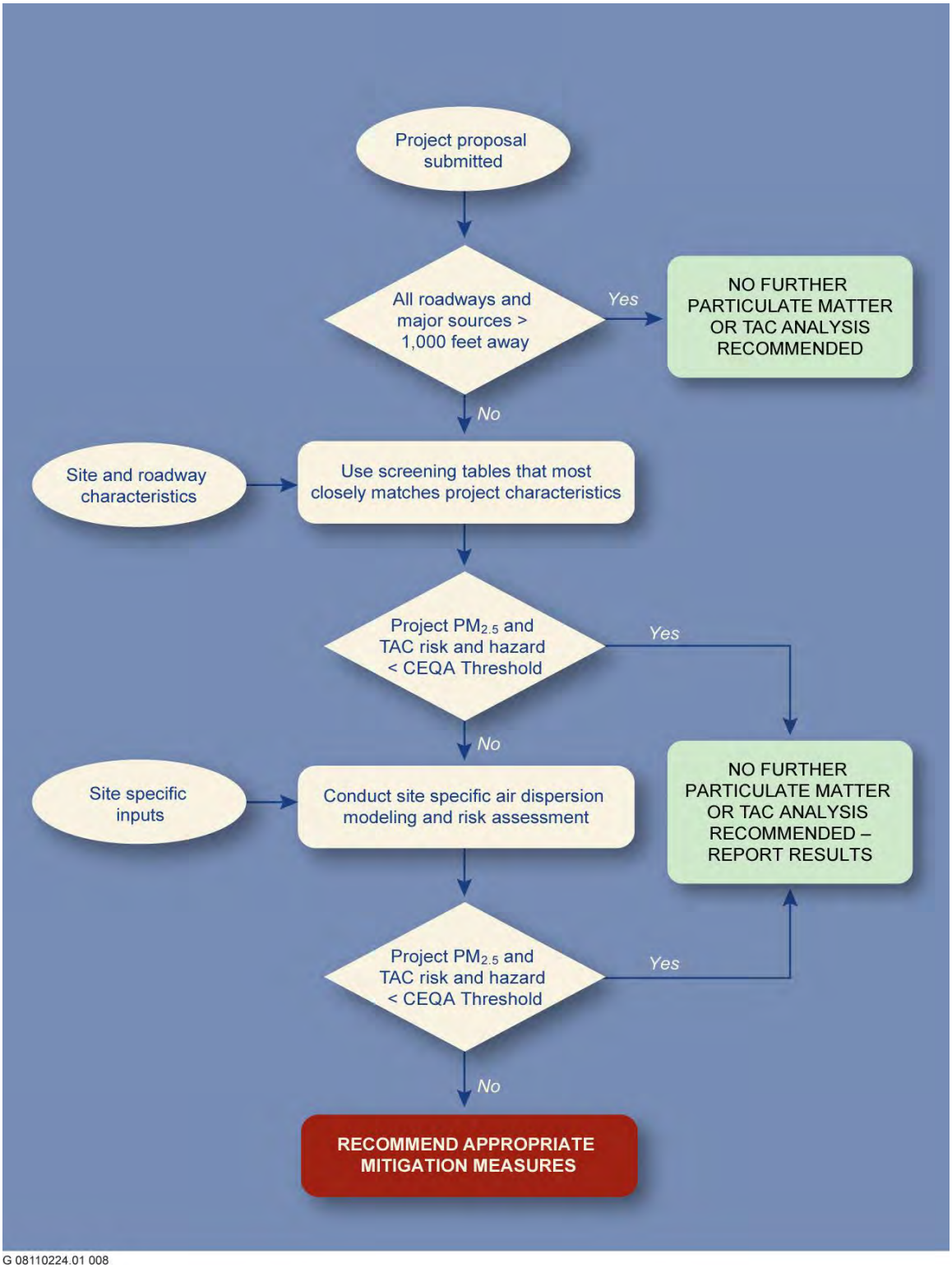
When siting a new receptor, a Lead Agency shall examine existing or future proposed sources of TAC and/or $PM_{2.5}$ emissions that would adversely affect individuals within the planned project. A Lead Agency shall examine:

- the extent to which existing sources would increase risk levels, hazard index, and/or $PM_{2.5}$ concentrations near the planned receptor,
- whether the existing sources are permitted or non-permitted by the BAAQMD, and
- whether there are freeways or major roadways near the planned receptor.

BAAQMD recommends that a Lead Agency identify all TAC and $PM_{2.5}$ sources located within a 1,000 foot radius of the proposed project site. A lead agency should enlarge the 1,000-foot radius on a case-by-case basis if an unusually large source or sources of risk or hazard emissions that may affect a proposed project is beyond the recommended radius. Permitted sources of TAC and $PM_{2.5}$ should be identified and located as should freeways and major roadways, and other potential sources. To conduct a thorough search, a Lead Agency shall gather all facility data within 1,000 feet of the project site (and beyond where appropriate).

The phased approach for evaluating impacts to new receptors is shown in Figure 5-3.

[4] The use of the receptor thresholds is discussed in section 2.8 of these Guidelines



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Phased Approach for Estimating Community Risks and Hazards – Receptors
Figure 5-3

5.2.6. Screening Table for Stationary Sources

BAAQMD will make available data for certain existing permitted, stationary sources of TAC and $PM_{2.5}$ with site locations, coordinates, source type, and screening-level estimates of excess cancer risk, chronic, and acute HI, and $PM_{2.5}$ concentrations. An example of the entries to be provided in this table is shown in Table 5-1.

Table 5-1
Screening Table for Existing Permitted Stationary Sources*
(within 1,000 feet of the Proposed Project)

EXAMPLE
Proposed Project Location Details:
Address-19th Avenue and Judah Street, San Francisco, CA
Centroid UTMs-E 546090, N 4179460

Site #	Facility Name	Street Address	City	UTM E	UTM N	Cancer Risk in a million	Chronic Hazard Index	Acute Hazard Index	$PM_{2.5}$ ug/m^3
462	20th Avenue Cleaner	1845 Irving Street	San Francisco	546113	4179490	7.5	0.02	0.00	
4672	Sundown Cleaners	1952 Irving Street	San Francisco	546016	4179510	7.5	0.02	0.00	
13519	Pacific Bell	1515 19th Avenue	San Francisco	546086	4179240	58.4	0.10	0.04	0.10
2155	Chevron Station #91000	1288 19th Avenue	San Francisco	546052	4179720	5.8	0.03	0.00	
8756	ConocoPhillips #251075	1400 19th Avenue	San Francisco	546064	4179490	2.7	0.01	0.00	
9266	ConocoPhillips #2611185	1401 19th Avenue	San Francisco	546058	4179500	2.2	0.01	0.00	
					Cumulative:	84	0.19	0.04	0.10

Source: BAAQMD 2009

*This example provides conservative screening level estimates and does not represent actual risk levels, HI or PM concentrations for the facilities listed.

Table 5-1 selects a hypothetical location at 19th Avenue and Judah Street in San Francisco, as shown at the top of the table along with the Universal Transverse Mercator (UTM) coordinates of the location. Below this location are listed permitted facilities within 1,000 feet of the example location. Each row contains entries for a specific existing permitted source and conservative estimates of maximum risk, hazard index, and $PM_{2.5}$ concentration within the 1,000 foot radius. Within a row, each risk, HI, or $PM_{2.5}$ concentration for a source can be compared to the significance threshold: cancer risk is compared to 10 in a million; chronic and acute hazard index are compared to 1.0; and $PM_{2.5}$ concentration is compared to 0.3 $\mu g/m^3$. In Table 5-1 all entries are below the target threshold except for the source at 1515 19th Avenue, which has a cancer risk, conservatively estimated at about 58 in a million.

It is important to note that the listing of existing sources provided by the BAAQMD provides conservative screening-level estimates and does not represent the actual risk levels, HI, or PM

concentrations for that facility. These estimates are assumed to be uniform within the 1,000 foot radius and independent of the distance between source and receptor.

To use the screening tables, a Lead Agency would identify sources in the tables within 1,000 feet (or beyond where appropriate) of the project site. Risks, hazards, and $PM_{2.5}$ concentrations for individual sources correspond to the table entries. These values are assumed to remain constant for all locations within the 1,000 foot radius. Table entries within a column can be summed to estimate the cumulative risks from all sources. The screening table for Air District permitted sources is also available as a compressed keyhole language (kmz) file for each of the nine Bay Area counties. The kmz file can be plotted using the Google Earth™ mapping tool, which is freely available as described in *Recommended Methodology for Screening and Modeling Local Risks and Hazards*.

5.2.7. Screening Tables for On-road Mobile Sources

For all State highways within the SFBAAB, BAAQMD will make available a set of maps and tables that provide screening-level risks and $PM_{2.5}$ concentrations. Screening tables are provided for each of the nine counties within BAAQMD's jurisdiction. To develop these tables, BAAQMD selected conservative assumptions and inputs following this general methodology:

- Hourly vehicle miles traveled (VMT) and emissions for 2012 were developed for each county using EMFAC based on default vehicle mix and full range of vehicle speeds.
- Highest vehicle traffic volumes for each roadway based on Caltrans's *2007 Traffic Volumes on California State Highways* were scaled based on VMT to develop hourly vehicle volumes.
- Hourly vehicle volume and emissions were input into a roadway model, CAL3QHCR, to estimate annual average concentrations using the most conservative meteorological data collected from monitoring locations within each county.

For the $PM_{2.5}$ screening tables, the peak one hour of traffic was used to develop hourly vehicle volumes that totaled to the annual average daily traffic while risk and hazard tables are based on annual average daily vehicle volumes.

The purpose of the screening tables is to provide an easy-to-use initial analysis to determine if nearby roadway impacts to a new receptor are below the thresholds of significance. The outcome of the screening may be used to make a determination of no further action or it may indicate that a more refined analysis is warranted. The recommended project screening approach is as follows:

1. Determine if the new receptor is at least 1,000 feet from the nearest significant traffic volume roadway defined as a freeway or arterial roadway with greater than 10,000 vehicles per day. For new residential developments, the receptor should be placed at the edge of the property boundary. If the receptor does not have any significant roadway sources within 1,000 foot radius, then the proposed project meets the distance requirements and no further single-source roadway-related air quality evaluation is recommended.

2. If the receptor is within the 1,000 feet radius of a nearby roadway that has greater than 20,000 vehicles per day, then use the county- and road-specific screening tables to determine the $PM_{2.5}$ concentrations, cancer risks, and hazards for the project. For non-California highways, default local roadway screening tables are provided in the online report *Recommended Methodology for Screening and Modeling Local Risks and Hazards*. If any of the thresholds for $PM_{2.5}$ concentration, risks, and hazards are

exceeded based on the comparisons, then more refined modeling analysis is recommended or the project sponsor may choose to implement mitigation measures.

3. For developments that exceed the screening analysis, site specific modeling analysis is recommended following BAAQMD's *Recommended Methodology for Screening and Modeling Local Risks and Hazards*.

For completion of Step 2 as described above, the methodology requires the use of appropriate screening tables to determine if the distance from the development to the nearby significant roadway will expose new receptors to concentrations exceeding the thresholds. The first step is to ensure that the latest screening tables have been downloaded from BAAQMD's website. An example (Table 5-2) is included in this section for San Francisco County for demonstration purposes only and should not be relied upon for use in a CEQA analysis. The Lead Agency or project sponsor must first gather project information including the county for which the development is proposed and the distance of the project to the nearest state highway or local roadway to determine which screening tables are appropriate. For each county, two tables are provided for $PM_{2.5}$ concentrations, cancer risks, chronic non-cancer hazards, and acute non-cancer hazards based on whether the project is located north or south of the roadway or east or west of the roadway. The direction tables correspond to whether the projects are located generally upwind or downwind of the roadway with respect to the prevailing wind direction. Appropriate values are then posted in each table based on the project being located 100 feet, 200 feet, 500 feet, 700 feet, and 1,000 feet from the edge of the nearest travel lane to the project.

For proposed projects, the appropriate cell should be determined by referencing the corresponding county, roadway, and project distance in the tables that most closely matches the project conditions. If the project is predominantly north or south of the roadway, choose the north or south tables. Likewise, if the project is predominantly east or west, choose the east or west tables. If the project is evenly located for example, northeast or southwest of the roadway, select the higher value between either screening tables based on the project distance to the roadway. For distances not listed in the tables, BAAQMD recommends that the values between the two closest distances be linearly interpolated to estimate the value that best reflects the actual project distance.

The results of the screening analysis indicate whether new receptors will be exposed to roadway TAC emissions at concentrations exceeding the threshold of significance and therefore, a more refined modeling analysis and quantitative HRA may be required. If the concentration is less than the thresholds, then no further analysis is required for the single source comparison for roadways. The results of the analysis should be reported in the environmental documentation or staff report that includes a reference to the screening tables used. If the concentrations exceed the thresholds, then the project sponsor has the option to conduct a more refined modeling analysis or implement appropriate mitigation measures.

An example of how to use the screening tables is provided as follows. A new residential development is hypothetically proposed at the intersection of 23rd Street and Minnesota Street in San Francisco. It is located approximately 440 feet to the east of midpoint of northbound Highway 280. Based on Table 5-2, the $PM_{2.5}$ concentrations from Highway 280 is 0.60 $\mu g/m^3$ at 200 feet away and 0.28 $\mu g/m^3$ 500 feet away from the project.

Table 5-2 East or West of San Francisco County Highway					
Highway	Distance East or West of Freeway – $PM_{2.5}$ Concentrations (ug/m^3)				
	100 Feet	200 Feet	500 Feet	700 Feet	1,000 Feet
1	0.50	0.28	0.12	0.096	0.060
35	0.14	0.11	0.032	0.020	0.016
80	1.0	0.64	0.30	0.20	0.15
101	1.1	0.72	0.34	0.26	0.17
280	0.80	**0.60**	**0.28**	0.19	0.13
Source: BAAQMD 2009; table above for demonstration purposes and should not be used in CEQA analysis.					

To linearly interpolate the $PM_{2.5}$ concentration for the project distance of 440 feet, the following equation was used:

(200 ft – 500 ft) x (0.60 ug/m^3 – $PM_{2.5\ 440\ feet}$) = (200 ft – 440 ft) x (0.6 ug/m^3 – 0.28 ug/m^3)

Solving for $PM_{2.5}$ at 440 feet, the $PM_{2.5}$ concentration is estimated as 0.34 ug/m^3.

A similar example methodology was applied to the cancer risk, chronic non-cancer hazard and acute hazard. The resulting values based on a distance of 440 feet are shown in Table 5-3.

Table 5-3 Cancer and Non-Cancer (Chronic and Acute) Hazard Indices at 440 feet			
Description	Screening Value	Thresholds	Exceeds Threshold?
$PM_{2.5}$ Concentration	0.34 ug/m^3	0.3 ug/m^3	Yes
Cancer Risk	1.1 in a million	10 in a million	No
Chronic Non-cancer Hazard Index	0.028	1	No
Acute Non-cancer Hazard Index	0.028	1	No
Source: BAAQMD 2009; table above for demonstration purposes and should not be used in CEQA analysis.			

In this example, the proposed project would exceed the $PM_{2.5}$ threshold, but not the risk or hazard-based thresholds. At this point, the project sponsor can ratio the PM concentration further based on the actual AADT at the closest milepost to the project. If the concentrations continue to exceed the threshold, the project sponsor can determine whether additional modeling is warranted or implementation of mitigation measures is appropriate. Possible options include moving the residential portion of the development to a distance at which the roadway impacts would be negligible or installing high efficiency filtration in the development.

If the project sponsors choose to conduct a more refined modeling analysis, BAAQMD recommends the following general procedures. More detailed methodology is provided on the online resources located at BAAQMD's CEQA webpage. To evaluate $PM_{2.5}$ concentrations, BAAQMD recommends using CAL3QHC, which was designed to model roadside CO and PM concentrations. The CAL3QHCR model can estimate $PM_{2.5}$ concentrations at defined receptor locations by processing hourly meteorological data over a year, hourly emissions, and traffic volume. The latest version of the model is available at: http://www.epa.gov/scram001/dispersion_prefrec.htm.

To run CAL3QHCR, meteorological, traffic, and vehicle emissions data at specified intervals over time are required. BAAQMD recommends the use of the meteorological data that most closely representatives conditions at the site. BAAQMD offers readily compatible meteorological data for each county within the SFBAAB that can be run by CAL3QHCR at http://hank.baaqmd.gov/tec/data/. For the screening analysis, BAAQMD relied on the most conservative meteorological data collected from any stations within the county; however, in this site-specific analysis, the user should select the data that is nearest the project and reflects actual meteorological conditions.

Emissions data must also be input into the CAL3QHCR model. Year 2012 average hourly emissions (e.g., grams/vehicle mile) were used in developing the screening tables. The emissions data can be produced using the EMFAC2007 model, but should be reflective of the base year in which residents will be residing in the new development. The model should also be run assuming the full range of vehicle fleet and if available, the average vehicle speeds along the specific stretch of road. However, if average speeds are not available, the user should select the full range of variable speeds to ensure that the analysis is health protective.

Table 5-4
San Francisco County State Highway Traffic Volumes

Highway Number	Average Daily 2-way Traffic Volumes (Vehicles/day)	Start Location	End Location
1	122,000	Alemany Boulevard	Presidio, South Highway 2, onto Golden Gate Bridge
35	31,000	John Muir Drive	Highway 1, Sloat Boulevard at 19th Avenue
80	254,000	Highway 101 at Division Street	Bay Bridge at Treasure Island, Yerba Buena Island
101	245,000	Third Street	Van Ness Avenue to Highway 1 at Golden Gate Bridge
280	195,000	Alemany Boulevard, San Jose Avenue	Mariposa Street to 4th Street and Brannan Street

Source: BAAQMD 2009

How to use the screening tables:

- Distance is from the center of the highway to the facility or development
- When two or more highways are within the influence area, sum the contribution from each freeway

The CAL3QHCR model also relies on hourly traffic volumes (e.g., vehicles per hour) as determined by the relative VMT. BAAQMD recommends developing a weighed VMT by using the ratio of VMT per hour to the peak VMT over the 24 hour day (as produced by the EMFAC model). This weighed VMT represents the percentage of traffic volume on an hourly basis over a 24 hour period. The hourly traffic volumes for the CAL3QHCR model are then the product of the weighed VMT by the peak traffic volumes for that roadway. The peak one-hour vehicle traffic for the applicable milepost of any California highway can be determined through the Caltrans web site at http://traffic-counts.dot.ca.gov/. Develop hourly emissions rates for input into the air model. The model provides annual average $PM_{2.5}$ concentrations that can be compared directly against the thresholds.

A more detailed analysis is required for estimating the risk and hazard evaluation. TAC emissions were evaluated for only those toxic compounds found in diesel or gasoline fuel including diesel PM, benzene, ethylbenzene, acrolein, etc. The District recommends using the CAL3QHCR model. The model must be run separately to estimate emissions from diesel PM and emission of other TAC. In each analysis, the District recommends developing diesel specific emission factors from EMFAC. Because risk and hazard are expressed as lifetime exposure, the emissions were averaged from 2012 to 2040 that accounts for more efficient vehicle emissions and increased VMT. Beyond 2040, the EMFAC model does not have emissions and consequently, the 2040 emissions were applied from 2040 to 2082, to complete a 70-year lifetime exposure.

Annual average traffic volumes were used in the model. As specified in Regulation 2, Rule 5, BAAQMD recommends that age sensitivity factors be applied to the emissions per year to account for early life-stage exposures. The cancer risk and hazard levels are calculated using the predicted annual average concentrations multiplied by the cancer slope factor for cancer risk or divided by the relative exposure levels for hazard.

The risk and hazard levels are then compared against the applicable thresholds. Further assessment may be warranted if the thresholds are exceeded, but the project sponsor may consider design changes and other mitigation measures as a means of reducing potential risks (see Section 5.4). For detailed discussion on this methodology, the project sponsor should download the online report *Recommended Methodology for Screening and Modeling Local Risks and Hazards*.

5.3. CUMULATIVE IMPACTS

5.3.1. Significance Determination

A Lead Agency shall examine TAC and/or $PM_{2.5}$ sources that are located within 1,000 feet of a proposed project site. Sources of TACs include, but are not limited to, land uses such as freeways and high volume roadways, truck distribution centers, ports, rail yards, refineries, chrome plating facilities, dry cleaners using perchloroethylene, and gasoline dispensing facilities. Land uses that contain permitted sources, such as a landfill or manufacturing plant, may also contain non-permitted TAC and/or $PM_{2.5}$ sources, particularly if they host a high volume of diesel truck activity. A Lead Agency should determine what the combined risk levels are from all nearby TAC sources in the vicinity of sensitive receptors. Lead agencies should use their judgment to decide if there are significant sources outside 1,000 feet that should be included.

A Lead Agency's analysis shall determine whether TAC and/or $PM_{2.5}$ emissions generated as part of a proposed project would expose off-site receptors to risk levels that exceed BAAQMD's applicable *Thresholds of Significance* for determining cumulative impacts.

A project would have a cumulative significant impact if the aggregate total of all past, present, and foreseeable future sources within a 1,000 foot radius (or beyond where appropriate) from the fence line of a source, or from the location of a receptor, plus the contribution from the project, exceeds the following:

- An excess cancer risk levels of more than 100 in one million or a chronic hazard index greater than 10 for TACs; or
- 0.8 µg/m^3 annual average $PM_{2.5}$.

Within impacted communities identified under BAAQMD's CARE program, the Lead Agency is encouraged to develop and adopt a Community Risk Reduction Plan. To determine whether a new source is located in an impacted community, the Lead Agency should refer to Figure 5-1 and the CARE webpage. Please consult with BAAQMD if a more precise map is needed.

BAAQMD recommends that cumulative impacts of new sources and new receptors be evaluated as described in Section 5.2, and include the impacts of all individual sources (stationary and roadways) within the 1,000 foot radius.

Community risk and hazards analyses should follow guidance developed by BAAQMD for risk screening described in *Recommended Methodology for Screening and Modeling Local Risks and Hazards*, which generally follows CAPCOA's guidance document titled *Health Risk Assessments for Proposed Land Use Projects*. $PM_{2.5}$ concentrations and risk levels estimated for the locations where receptors may be located should be compared to BAAQMD's applicable *Threshold of Significance* for siting a new receptor near existing sources of TAC emissions.

A Lead Agency shall compare the analysis results from TAC and $PM_{2.5}$ emissions with the applicable *Threshold of Significance*. *Thresholds of Significance* apply for projects that would site new permitted or non-permitted sources in close proximity to receptors and for projects that would site new sensitive receptors in close proximity to permitted or non-permitted sources of TAC emissions. If a proposed project would not exceed BAAQMD's applicable *Threshold of Significance* for TACs or $PM_{2.5}$, then the project would result in a less-than-significant air quality impact. If a project would exceed the applicable *Threshold of Significance,* the proposed project would result in a significant air quality impact and the Lead Agency should implement all feasible mitigation to reduce the impact (refer to Section 5.4).

If implementation of BAAQMD-recommended mitigation measures for reducing TAC and $PM_{2.5}$ emissions and resultant exposure to health risks would reduce all TAC impacts to levels below the applicable *Threshold of Significance*, TAC impacts would be reduced to a less-than-significant level. If resultant health risk exposure would still exceed the applicable *Threshold of Significance*, the impacts would remain significant and unavoidable.

5.4. COMMUNITY RISK REDUCTION PLANS

The goal of a Community Risk Reduction Plan would be to bring TAC and $PM_{2.5}$ concentrations for the entire community covered by the Plan down to acceptable levels as identified by the local jurisdiction and approved by the Air District. This approach provides local agencies a proactive alternative to addressing communities with high levels of risk on a project-by-project approach. The Air District has developed detailed guidelines for preparing Community Risk Reduction Plans which can be found on the Air District web site at: http://www.baaqmd.gov/Divisions/Planning-and-Research/CEQA-GUIDELINES.aspx.

Qualified Community Risk Reduction Plans
A qualified Community Risk Reduction Plan adopted by a local jurisdiction should include, at a minimum, the following elements:

(A) Define a planning area;

(B) Include base year and future year emissions inventories of TACs and PM2.5;

(C) Include Air District–approved risk modeling of current and future risks;

(D) Establish risk and exposure reduction goals and targets for the community in consultation with Air District staff;

(E) Identify feasible, quantifiable, and verifiable measures to reduce emissions and exposures;

(F) Include procedures for monitoring and updating the inventory, modeling and reduction measures in coordination with Air District staff;

(G) Be adopted in a public process following environmental review.

5.5. MITIGATING LOCAL COMMUNITY RISK AND HAZARD IMPACTS

For stationary sources, please refer to BAAQMD's permit handbook and BACT/T-BACT workbook. BAAQMD-recommended mitigation measures for reducing the exposure of sensitive receptors to TACs and hazards include the following:

1. Increase project distance from freeways and/or major roadways.

2. Redesign the site layout to locate sensitive receptors as far as possible from any freeways, major roadways, or other non-permitted TAC sources (e.g., loading docks, parking lots).

3. In some cases, BAAQMD may recommend site redesign. BAAQMD will work closely with the local jurisdiction and project consultant in developing a design that is more appropriate for the site.

4. Large projects may consider phased development where commercial/retail portions of the project are developed first. This would allow time for CARB's diesel regulations to effectively reduce diesel emissions along major highways and arterial roadways. Ultimately lower concentrations would be predicted along the roads in the near future such that residential development would be impacted by less risk in later phases of development.

5. Projects that propose sensitive receptors adjacent to sources of diesel PM (e.g., freeways, major roadways, rail lines, and rail yards) shall consider tiered plantings of trees such as redwood, deodar cedar, live oak and oleander to reduce TAC and PM exposure. This recommendation is based on a laboratory study that measured the removal rates of PM passing through leaves and needles of vegetation. Particles were generated in a wind tunnel and a static chamber and passed through vegetative layers at low wind velocities. Redwood, deodar cedar, live oak, and oleander were tested. The results indicate that all forms of vegetation were able to remove 65–85 percent of very fine particles at wind velocities below 1.5 meters per second (approximately 3 miles per hour [mph]) with redwood and deodar cedar being the most effective. Even greater

removal rates were predicted for ultra-fine PM (i.e., aerodynamic resistance diameter of 0.1 micrometer or less).

6. Install and maintain air filtration systems of fresh air supply either on an individual unit-by-unit basis, with individual air intake and exhaust ducts ventilating each unit separately, or through a centralized building ventilation system. The ventilation system should be certified to achieve a certain effectiveness, for example, to remove at least 80% of ambient $PM_{2.5}$ concentrations from indoor areas. The air intake for these units should be located away from areas producing the air pollution (i.e., away from major roadways and highways).

7. Where appropriate, install passive (drop-in) electrostatic filtering systems, especially those with low air velocities (i.e., 1 mph).

8. Locate air intakes and design windows to reduce PM exposure (e.g., windows nearest to the freeway do not open).

9. Install indoor air quality monitoring units in buildings.

10. Require rerouting of nearby heavy-duty truck routes.

11. Enforce illegal parking and/or idling of heavy-duty trucks in vicinity.

6. LOCAL CARBON MONOXIDE IMPACTS

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Emissions and ambient concentrations of CO have decreased dramatically in the SFBAAB with the introduction of the catalytic converter in 1975. No exceedances of the CAAQS or NAAQS for CO have been recorded at nearby monitoring stations since 1991. SFBAAB is currently designated as an attainment area for the CAAQS and NAAQS for CO; however, elevated localized concentrations of CO still warrant consideration in the environmental review process. Occurrences of localized CO concentrations, known as hotspots, are often associated with heavy traffic congestion, which most frequently occur at signalized intersections of high-volume roadways.

6.1. SIGNIFICANCE DETERMINATION

Step 1: Comparison of Project Attributes with Screening Criteria

The first step in determining the significance of CO emissions is to compare the attributes of the proposed project to the applicable S*creening Criteria* (refer to Chapter 3).

This preliminary screening procedure provides a conservative indication of whether the proposed project would result in the generation of CO concentrations that would substantially contribute to an exceedance of the *Thresholds of Significance*. If all of the *Screening Criteria* are met, the proposed project would result in a less-than-significant impact to air quality with respect to concentrations of local CO. If the proposed project does not meet all the screening criteria, then CO emissions should be quantified.

Step 2: Emissions Quantification

This section describes recommended methodologies for quantifying concentrations of local CO for proposed projects that do not meet all of the *Screening Criteria*. The recommended methodology is to use both the On-Road Mobile-Source Emission Factors (EMFAC) and the California Line Source Dispersion Model (CALINE4) models in accordance with recommendations in the University of California, Davis, Transportation Project-Level Carbon Monoxide Protocol (*CO Protocol*) (Garza, et al. 1997).

Air Quality Models

BAAQMD recommends using the most current version of the EMFAC model to obtain mobile-source emission factors for CO associated with operating conditions that would be representative of the roadway or facility subject to analysis.

Users should input the emission factors and other input parameters into the CALINE4 model to quantify CO concentrations near roadways or facilities.

The *CO Protocol* contains detailed methodology for modeling CO impacts.

Input Parameters

The CALINE4 model contains five screens for input data. CALINE4 input parameters are summarized below. For more detailed descriptions see the CALINE4 Users Guide.

Job Parameters

File Name – Name the file (e.g., data file extension) to create the CALINE4 Input file.

Job Title – Provide a name for the modeling scenario (e.g., existing no project, existing plus project).

Run Type – Select the worst-case wind angle.

Aerodynamic Roughness Coefficient – Choose the characteristic (i.e., rural, suburban, central business district, other) that is most representative of the project site.

Model Information – Indicate the unit of measurement (i.e., meters or feet) and inputs the vertical dimension of the project (i.e., altitude above sea level).

Run – Once data input is completed, return to this screen to run the model. Upon running the model, the output will appear as a text file called C4$.out. Save the output file under an appropriate filename for future reference.

Link Geometry

On this screen, input the dimensions (i.e., coordinates) for the roadway intersection that is the subject of the analysis.

Link Name – Input names for each roadway segment.

Link Type – Indicate the character of the roadway segment (i.e., at-grade, depressed, fill, bridge, parking lot).

Endpoint Coordinates (X_1, X_2, Y_1, Y_2) – Input the dimensions (i.e., coordinates) of the roadway segments as though the intersection were oriented at point of origin X = 0, Y = 0 on a Cartesian coordinate system. Roadway segments approaching the intersection from the west side of the screen (if north is treated as “up”, or the top of the screen) would have negative X coordinate endpoints. Similarly, roadway segments approaching the intersection from the south would have negative Y coordinate endpoints.

Link Height – Indicate the vertical dimension of the roadway segment. If the roadway segment is at-grade, should set this parameter to zero. If the roadway segment is depressed, enter a negative value for this parameter.

Mixing Zone Width – The Mixing Zone is defined as the width of the roadway, plus three meters on either side. The minimum allowable value is 10 meters, or 32.81 feet.

Canyon/Bluff (Mix Left/Right) – Set these features to zero.

Link Activity

Traffic Volume – Input hourly traffic volumes applicable to each roadway segment.

Emission Factor – Input the CO emission factor (in units of grams/mile) obtained from EMFAC for the applicable vehicle speed class reflecting operating conditions for the affected intersection.

Run Conditions

Wind Speed – Input 0.5 meters per second to represent worst-case conditions.

Wind Direction – Set parameter to zero. Select "Worst-Case Wind Angle" as the "Run Type" on the "Job Parameters" screen, so this field will be overridden by the model.

Wind Direction Standard Deviation – Use a wind direction standard deviation of 5 degrees to represent worst-case conditions.

Atmospheric Stability Class – Use Stability Class 4 (i.e., class D) to represent average conditions in the SFBAAB.

Mixing Height – Indicate the vertical dimension over which vertical mixing may occur. In most situations, input 300 meters, approximately the height of the atmospheric boundary layer. If the roadway subject to analysis is a bridge underpass, tunnel, or other situation where vertical mixing would be limited, indicates the height of the structure that would hamper vertical mixing (in units of meters).

Ambient Temperature – Indicate the average temperature of the project site during the time of day at which maximum daily traffic volume would occur (in degrees Celsius). A temperature of 7.2 degrees Celsius is recommended.

Ambient Pollutant Concentration – Enter 0 in this field to determine the contribution of CO from the roadway subject to analysis. Add the roadway-related CO concentration to ambient CO levels outside of the CALINE4 model, as discussed later in this section.

Receptor Positions

Receptor Name – Input names for each receptor.

Receptor Coordinates (X, Y, Z) – Input receptor coordinates in a manner similar to the "Link Coordinates" on the "Link Geometry" screen. Locate receptors at three and seven meters from the intersection in all directions from the intersection, in accordance with the recommendations of the *CO Protocol*. The Receptor Coordinates are oriented in the same Cartesian coordinate system as the roadway segment "Link Coordinates." Receptors located to the southwest of the intersection would have negative X and Y coordinates. The Z dimension should be assigned the coordinate of 1.8 meters (5.9 feet); the approximate breathing height of a receptor located adjacent to the roadway.

This screen also contains a window that shows a map of the link and receptor coordinates in the X, Y plane.

Model Output

CALINE4 output includes estimated 1-hour CO concentrations in units of ppm at the receptor locations input into the model. Note the highest concentrations at each of the three meter and seven meter receptor distances from the roadway.

Background Concentrations

Ambient 1-hour CO concentrations can be obtained from ARB air quality monitoring station data and 8-hour concentrations from EPA. Users should obtain the CO monitoring data recorded at the monitoring station nearest the project site. According to the *CO Protocol*, select the second highest concentration recorded during the last two years to represent the ambient CO concentration in the project area.

Estimated Localized CO Concentrations

Users should sum the highest modeled 1-hour CO concentration in units of ppm obtained from CALINE4 to ambient (background) 1-hour CO concentrations in ppm obtained from ARB. This represents the modeled worst-case 1-hour CO concentration near the affected roadway.

Persistence Factor – multiply the highest 1-hour CO concentration estimated by CALINE4 by a persistence factor of 0.7, as recommended in the CO Protocol, to obtain the estimated 8-hour CO concentration.

Add the estimated 8-hour CO concentration (ppm) obtained in the previous step to the ambient 8-hour CO concentration obtained from EPA (ppm). This represents the modeled worst-case 8-hour CO concentration near the affected roadway.

Step 3: Comparison of Unmitigated Emissions with Thresholds of Significance
Following quantification of local CO emissions in accordance with the recommended methods, compare the total modeled worst-case 1-hour and 8-hour CO concentrations with the applicable *Threshold of Significance*. If the modeled concentrations do not exceed any of the *Thresholds of Significance*, the project would result in a less-than-significant impact to air quality. If modeled concentrations do exceed any applicable *Threshold of Significance,* the proposed project would result in a significant impact to air quality with respect to local CO impacts.

Step 4: Mitigation Measures and Emission Reductions
Where local CO emissions exceed applicable *Thresholds of Significance*, refer to Section 6.2 for recommended mitigation measures and associated emission reductions. Only reduction measures included in the proposed project or recommended as mitigation in a CEQA-compliant document can be included when quantifying mitigated emission levels.

Step 5: Comparison of Mitigated Emissions with Thresholds of Significance
Following quantification of local CO emissions in accordance with the recommended methods, compare the total modeled worst-case 1-hour and 8-hour CO concentrations with the applicable *Thresholds of Significance*. If the implementation of recommended mitigation measures reduces all local CO emissions to levels below the applicable *Thresholds of Significance*, the impact to air quality would be reduced to a less-than-significant level. If mitigated levels of local CO emissions still exceed the applicable *Threshold of Significance*, the impact to air quality would remain significant and unavoidable.

6.2. MITIGATING LOCAL CARBON MONOXIDE IMPACTS

The following section describes recommended mitigation measures for reducing local CO impacts to air quality. Consider implementation of the following measures, as feasible, for reducing project-generated traffic volumes and associated CO emissions at affected intersections. Actual emission reductions should be quantified through project-specific transportation modeling.

1. Synchronize traffic signals to improve traffic flow and minimize traffic congestion.

2. Consider additional traffic signals, such as light metering, to relocate congested areas further away from receptors.

3. Improve public transit service to reduce vehicle traffic and increase public transit mode share during peak traffic congestion periods.

4. Improve bicycle and pedestrian infrastructure to reduce vehicle traffic and increase bicycle and pedestrian mode share during peak traffic congestion periods. Improvements may include installing class I or II bike lanes, sidewalks, and traffic calming features.

5. Adjust pedestrian crosswalk signal timing to minimize waiting time for vehicles turning right or otherwise sharing green time with pedestrians. Give pedestrians a head start before traffic signal changes to green.

6. Where pedestrian traffic is high, implement pedestrian crosswalks with multi-directional crossings allowing pedestrians to cross intersections diagonally.
7. Limit heavy-duty truck traffic during peak hours. Designate truck routes that divert truck traffic away from congested intersections.
8. Limit left turns or other maneuvers during peak hours that add to congestion.
9. Limit on-street parking during peak hours to allow for added vehicle capacity.
10. Implement traffic congestion-alleviating mitigation measures as identified by a traffic engineer.

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7. ODOR IMPACTS[5]

Odor impacts could result from siting a new odor source near existing sensitive receptors or siting a new sensitive receptor near an existing odor source. Examples of land uses that have the potential to generate considerable odors include, but are not limited to:

1. Wastewater treatment plants;
2. Landfills;
3. Confined animal facilities;
4. Composting stations;
5. Food manufacturing plants;
6. Refineries; and
7. Chemical plants.

Odors are generally regarded as an annoyance rather than a health hazard. Manifestations of a person's reaction to odors can range from psychological (e.g., irritation, anger, or anxiety) to physiological (e.g., circulatory and respiratory effects, nausea, vomiting, and headache).

The ability to detect odors varies considerably among the population and overall is quite subjective. People may have different reactions to the same odor. An odor that is offensive to one person may be perfectly acceptable to another (e.g., coffee roaster). An unfamiliar odor is more easily detected and is more likely to cause complaints than a familiar one. Known as odor fatigue, a person can become desensitized to almost any odor and recognition only occurs with an alteration in the intensity.

Quality and intensity are two properties present in any odor. The quality of an odor indicates the nature of the smell experience. For instance, if a person describes an odor as flowery or sweet, then the person is describing the quality of the odor. Intensity refers to the strength of the odor. For example, a person may use the word strong to describe the intensity of an odor. Odor intensity depends on the concentration in the air. When an odor sample is progressively diluted, the odor concentration decreases. As this occurs, the odor intensity weakens and eventually becomes so low that the detection or recognition of the odor is quite difficult. At some point during dilution, the concentration of the odor reaches a level that is no longer detectable.

The presence of an odor impact is dependent on a number of variables including:

1. Nature of the odor source (e.g., wastewater treatment plant, food processing plant);
2. Frequency of odor generation (e.g., daily, seasonal, activity-specific);
3. Intensity of odor (e.g., concentration);
4. Distance of odor source to sensitive receptors (e.g., miles);
5. Wind direction (e.g., upwind or downwind); and
6. Sensitivity of the receptor.

The recommendations provided in this chapter only apply to assessing and mitigating odor impacts for individual projects. Please refer to Chapter 9 for recommendations for assessing and mitigating odor impacts at the plan-level.

[5] The use of the receptor thresholds is discussed in section 2.8 of these Guidelines

7.1. SIGNIFICANCE DETERMINATION

Odor impacts could occur from two different situations:

1. Siting a new odor source (e.g., the project includes a proposed odor source near existing sensitive receptors), or
2. Siting a new receptor (e.g., the project includes proposed sensitive receptors near an existing odor source).

Regardless of the situation, BAAQMD recommends completing the following steps to comprehensively analyze the potential for an odor impact.

Step 1: Disclosure of Odor Parameters

The first step in assessing potential odor impacts is to gather and disclose applicable information regarding the characteristics of the buffer zone between the sensitive receptor(s) and the odor source(s), local meteorological conditions, and the nature of the odor source. Consideration of such parameters assists in evaluating the potential for odor impacts as a result of the proposed project. Projects should clearly state the following information in odor analyses, which provide the minimum amount of information required to address potential odor impacts:

1. Type of odor source(s) the project is exposed to or the type of odor source(s) produced by the project (e.g., wastewater treatment plant, landfill, food manufacturing plant);
2. Frequency of odor events generated by odor source(s) (e.g., operating hours, seasonal);
3. Distance and landscape between the odor source(s) and the sensitive receptor(s) (e.g., topography, land features); and
4. Predominant wind direction and speed and whether the sensitive receptor(s) in question are upwind or downwind from the odor source(s).

Step 2: Odor Screening Distances

BAAQMD has developed a list of recommended odor screening distances for specific odor-generating facilities shown in Table 3-3. Projects that would locate sensitive receptor(s) to odor source(s) closer than the screening distances would be considered to result in a potential significant impact. If the proposed project would include the operation of an odor source, the screening distances should also be used to evaluate the potential impact to existing sensitive receptors. Projects that would locate sensitive receptor(s) near odor source(s) farther than the screening distances, or vice versa, would be considered to have a sufficient buffer to avoid significant impacts. The odor screening distances in Table 3-3 should not be used as absolute thresholds, rather an indicator to how much further analysis is required. The Lead Agency should also consider the other parameters listed above in Step 1 and information from Step 3 below to comprehensively evaluate potential odor impacts.

Step 3: Odor Complaint History

The impact of an existing odor source on surrounding sensitive receptors should also be evaluated by identifying the number of confirmed complaints received for that specific odor source.

Facilities that are regulated by CalRecycle (e.g. landfill, composting, etc.) are required to have Odor Impact Minimization Plans (OIMP) in place and have procedures that establish fence line odor detection thresholds. The Air District recognizes a Lead Agency's discretion under CEQA to use established odor detection thresholds as thresholds of significance for CEQA review for CalRecycle regulated facilities with an adopted OIMP.

If the proposed project would be located near an existing odor source, lead agencies should contact BAAQMD to obtain the odor complaints over the past 3 years for the source in question. Then calculate the annual average confirmed odor complaints filed for the source. BAAQMD considers a source to have a substantial number of odor complaints if the complaint history includes five or more confirmed complaints per year averaged over a 3-year period. Also, disclose the distance at which receptors were affected by the existing odor source. As discussed in Step 1, describe the topography and landscape between the receptors and the odor source. These distances and landscaping should then be compared with the distance and landscape that would separate the proposed project and the odor source.

If the proposed project would locate an odor source, first identify the location of potential sensitive receptors (i.e., distance, upwind/downwind) with respect to the project site. If the proposed odor source does not have any existing or planned sensitive receptors within the screening distances shown in Table 3-3, it may be considered less than significant for odor impacts. To evaluate how implementation of the proposed source project would affect identified sensitive receptors contact BAAQMD to obtain odor complaints in the region for facilities similar in size and type of odor produced in the past 3 years. These surrogate odor complaints should be evaluated for their distance from source to receptor, and then compared with the distance from the proposed project to receptors. Odor complaints from the surrogate odor source are considered substantial if the complaint history includes more than five confirmed complaints per year averaged over a 3-year period.

BAAQMD considers a substantial number of odor complaints, specifically, more than five confirmed complaints per year averaged over the past three years as the indication of an odor impact. As discussed above, the Lead Agency should compare the odor parameters (i.e., distance and wind direction) associated with the odor complaints that have been filed with those of the proposed project. Similar to the odor screening distances, odor complaints should not be used as an absolute threshold, but evidence to support a significance determination.

Step 4: Significance Determination

An odor source with five or more confirmed complaints per year averaged over three years is considered to have a significant impact. BAAQMD recognizes that there is not one piece of information that can solely be used to determine the significance of an odor impact. The factors (i.e., Step 1 through 3) discussed above could enhance the potential for a significant odor impact or help prevent the potential for a significant odor impact. For example, a project that would be located near an existing odor source may not discover any odor complaints for the existing odor source. It is possible that factors such as a small number of existing nearby receptors, predominate wind direction blowing away from the existing receptors, and/or seasonality of the odor source has prevented any odor complaints from being filed about the existing odor source. The results of each of the steps above should be clearly disclosed in the CEQA document. Projects should use the collective information from Steps 1 through 3 to qualitatively evaluate the potential for a significant odor impact. The Lead Agency should clearly state the reasoning for the significance determination using information from Steps 1 through 3 to support the determination.

7.2. MITIGATING ODOR IMPACTS

BAAQMD considers appropriate land use planning the primary method to mitigate odor impacts. Providing a sufficient buffer zone between sensitive receptors and odor sources should be considered prior to analyzing implementation of odor mitigation technology. Projects that would include potential sensitive receptors should consider the odor parameters, discussed in Step 1 above, during the planning process to avoid siting receptors near odor sources. Similarly, projects

that would include an odor source should consider the location of nearby existing sensitive receptors that could be affected by the project.

The source types for which mitigation has been provided below have been selected based on the nature of the odors produced as a result of their operational activities. These land use types are those most likely to result in odor impacts if sensitive receptors are located in close proximity. This should not be considered an exhaustive list and due to the subjective nature of odor impacts, there is no formulaic method to assess if odor mitigation is sufficient. In determining whether the implementation of mitigation would reduce the potential odor impact to a less-than-significant level, rely on the information obtained through the steps above.

7.2.1. Wastewater Treatment Plant

Main odor sources for wastewater treatment plants typically are the headworks area where the wastewater enters the facility and large solids and grit are removed, the primary clarifiers where suspended solids are removed, and the aeration basins when poor mixing characteristics lead to inadequate dissolved oxygen levels. Lead agencies should consider applying the following odor mitigation measures to wastewater treatment plants.

1. Activated Carbon Filter/Carbon adsorption
2. Biofiltration/Bio Trickling Filters
3. Fine Bubble Aerator
4. Hooded Enclosures
5. Wet and Dry Scrubbers
6. Caustic and Hypochlorite Chemical Scrubbers
7. Ammonia Scrubber
8. Energy Efficient Blower System
9. Thermal Oxidizer
10. Capping/Covering Storage Basins and Anaerobic Ponds
11. Mixed Flow Exhaust
12. Wastewater circulation technology
13. Exhaust stack and vent location with respect to receptors

7.2.2. Landfill/Recycling/Composting Facilities

Odors generated from landfills and composting facilities are typically associated with methane production from the anaerobic decomposition of waste. Lead agencies should consider applying the mitigation measures below to reduce and treat methane in facilities. Landfill projects should also implement best management practices to avoid and minimize the creation of anaerobic conditions.

1. Passive Gas Collection
2. Active Gas Collection
3. Flaring or energy production/utilization
4. Vegetation Growth on Landfill Cover
5. Cover/Cap Landfill
6. Odor Neutralizing Spray
7. Negative aeration for compost facilities
8. Turning and mixing of compost piles

Facilities that are regulated by CalRecycle (e.g. landfill, composting, etc.) are required to have Odor Impact Minimization Plans (OIMP) in place and have procedures that establish fence line odor detection thresholds. The Air District recognizes a Lead Agency's discretion under CEQA to use established odor detection thresholds as thresholds of significance for CEQA review for CalRecycle regulated facilities with an adopted OIMP.

7.2.3. Petroleum Refinery

Odors generated from materials and processes associated with petroleum refineries include, but are not limited to, H_2S, SO_2, mercaptan, ammonia (NH_3), and petroleum coke. Installing the following current and feasible odor mitigation measures for petroleum refineries should be considered.

1. Water Injections to Hydrocracking Process
2. Vapor recovery system
3. Injection of masking odorants into process streams
4. Flare meters and controls
5. Wastewater circulation technology for Aerated Ponds
6. Exhaust stack and vent location with respect to receptors
7. Thermal oxidizers
8. Carbon absorption
9. Biofiltration/Bio Trickling Filters

7.2.4. Chemical Plant

Chemical plants can generate a variety of different odors (e.g., acrylates, phenols, and styrene) as a result of process emissions. The range of odor mitigation measures required for chemical plants may vary substantially depending on the type of odors produced. The odor mitigation measures could be applied to chemical plants.

1. Wet scrubbers (50–90 percent efficiency)
2. Catalytic oxidation (99 percent efficiency)
3. Thermal oxidation (90–99 percent efficiency)
4. Carbon adsorption (95 percent efficiency)
5. Exhaust stack and vent location with respect to receptors

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7.2.5. Food Services

Restaurants, especially fast food restaurants, can generate substantial sources of odors as a result of cooking processes and waste disposal. Char broilers, deep-fryers, and ovens tend to produce food odors that can be considered offensive to some people. The food waste produced by restaurants can putrefy if not properly managed, which can also produce objectionable odors. The follow mitigation measures are management practices and odor technology that can be used to reduce the amount odors generated by food services.

1. Integral grease filtration system or grease removal system
2. Baffle filters
3. Electrostatic precipitator
4. Water cooling/cleaning unit
5. Disposable pleated or bag filters

6. Activated carbon filters
7. Oxidizing pellet beds
8. Incineration
9. Catalytic conversion
10. Proper packaging and frequency of food waste disposal
11. Exhaust stack and vent location with respect to receptors

In conclusion, odor impacts can also be minimized, contained, or prevented by implementing technologies and design measures at the source, or through planning-based measures. Where odor sources and receptors cannot be physically separated to a degree where impacts would be minimized to less-than-significant level, disclosures of odor sources to prospective tenants of sensitive land uses should be used. Mitigation for odors that is both effective and feasible shall be selected on a case-by-case basis.

8. CONSTRUCTION-RELATED IMPACTS

Construction-related activities are those associated with the building of a project or plan components. Construction activities are typically short-term or temporary in duration; however, project-generated emissions could represent a significant impact with respect to air quality and/or global climate change. Construction-related activities will result in the generation of criteria air pollutants including carbon monoxide (CO), sulfur dioxide (SO_2), particulate matter (PM_{10}, and $PM_{2.5}$); precursor emissions such as, reactive organic gases (ROG) and oxides of nitrogen (NO_X), and GHGs from exhaust, fugitive dust, and off-gas emissions. Sources of exhaust emissions could include on-road haul trucks, delivery trucks, worker commute motor vehicles, and off-road heavy-duty equipment. Sources of fugitive emissions (e.g., PM dust) could include construction-related activities such as soil disturbance, grading, and material hauling. Sources of off-gas emissions could include asphalt paving and the application of architectural coatings.

The recommendations provided in this chapter only apply to assessing and mitigating construction-related impacts for individual projects. Construction-related assumptions and project-specific information assumed in CEQA analyses should accompany the quantitative analysis described below. Refer to Chapter 9 for recommendations for assessing and mitigating construction-related impacts at the plan level.

8.1. CRITERIA AIR POLLUTANTS AND PRECURSORS

8.1.1. Significance Determination

Step 1: Comparison of Project Attributes with Screening Criteria

The first step in determining the significance of construction-related criteria air pollutants and precursors is to compare the attributes of the proposed project with the applicable *Screening Criteria* listed in Chapter 3. If all of the *Screening Criteria* are met, construction of the proposed project would result in a less-than-significant impact to air quality. If not, than construction emissions need to be quantified.

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Step 2: Emissions Quantification

BAAQMD recommends using URBEMIS to quantify construction emissions for proposed land use development projects and the Roadway Construction Emissions Model (RoadMod) for proposed linear projects such as, new roadway, roadway widening, or pipeline installation). The most current URBEMIS (currently version 9.2.4) should be used for emission quantification. Table 8-5 outlines summary guidelines for using URBEMIS. Refer to Appendix B for detailed instructions for modeling construction-generated emissions using URBEMIS and RoadMod.

Step 3: Comparison of Unmitigated Emissions with Thresholds of Significance

Following quantification of project-generated construction-related emissions, the total average daily emissions of each criteria pollutant and precursor should be compared with the applicable *Threshold of Significance*. For instance, with respect PM_{10} and $PM_{2.5}$, compare the total amount of emissions from both exhaust and fugitive sources with the applicable *Threshold of Significance*. If construction-related emissions have been quantified using multiple models or

model runs, sum the criteria air pollutants and precursor levels from each where said activities would overlap. In cases where the exact timing of construction activities is not known, sum any phases that could overlap to be conservative.

If daily average emissions of construction-related criteria air pollutants or precursors would not exceed any of the *Thresholds of Significance*, the project would result in a less-than-significant impact to air quality. If daily average emissions of construction-related criteria air pollutants or precursors would exceed any applicable *Threshold of Significance,* the proposed project would result in a significant impact to air quality and would require mitigation measures for emission reductions.

Step 4: Mitigation and Emission Reductions

For all proposed projects, BAAQMD recommends the implementation of all *Basic Construction Mitigation Measures* (Table 8.2) whether or not construction-related emissions exceed applicable *Thresholds of Significance*. In addition, all projects must implement any applicable air toxics control measures (ATCM). For example, projects that have the potential to disturb asbestos (from soil or building material) must comply with all the requirements of ARB's ATCM for Construction, Grading, Quarrying, and Surface Mining Operations. Only reduction measures included in the proposed project's description or recommended as mitigation in a CEQA-compliant environmental document can be included when quantifying mitigated emission levels. Refer to Appendix B for detailed instructions on how to use URBEMIS to quantify the effects of construction emissions mitigation measures.

Step 5: Comparison of Mitigated (Basic Mitigation) Emissions with Thresholds of Significance

Following quantification of project-generated construction-related emissions, compare the total average daily amount of mitigated (with implementation of *Basic Construction Mitigation Measures)* criteria air pollutants and precursors with the applicable *Thresholds of Significance*. If the implementation of BAAQMD-recommended *Basic Construction Mitigation Measures* would reduce all construction-related criteria air pollutants and precursors to levels below the applicable *Thresholds of Significance*, the impact to air quality would be less than significant. If emissions of any criteria air pollutant or precursor would exceed the applicable *Threshold of Significance*, the impact to air quality would be significant. Table 8-1 provides an example of significance determination methodology.

Step 6: Implement Additional Construction Mitigation Measures

BAAQMD recommends that all proposed projects, where construction-related emissions would exceed the applicable *Thresholds of Significance*, implement the *Additional Construction Mitigation Measures* (Table 8-3). The methodology for quantifying reductions of fugitive PM dust, exhaust, and off gas emissions associated with the implementation of these mitigation measures are discussed separately below (Table 8-3). Keep all of the changes recommended above with regards to the *Basic Construction Mitigation Measures*, as the emission reductions associated with these *Additional Construction Mitigation Measures* are considered additive. Please note that in RoadMod all of these associated reductions should be taken outside of the model, described in further detail in Appendix B.

Step 7: Comparison of Mitigated Emissions with Thresholds of Significance

Following quantification of project-generated construction-related emissions in accordance with the above BAAQMD-recommended methods, compare the total average daily amount of mitigated (with *Additional Construction Mitigation Measures* implemented) criteria air pollutants and precursors with the applicable *Thresholds of Significance*. If the implementation of additional mitigation measures would reduce all construction-related criteria air pollutants and precursors to levels below the applicable *Thresholds of Significance*, the impact to air quality would be reduced

to a less-than-significant level. If mitigated levels of any criteria air pollutant or precursor still exceed the applicable *Threshold of Significance*, the impact to air quality would remain significant and unavoidable.

Table 8-1
Example Construction Criteria Air Pollutant and Precursor Significance Determination

Step	Emissions Source	Emissions (lb/day or tpy)			
		ROG	NO_X	PM_{10}	$PM_{2.5}$
2	Fugitive Dust Emissions	-	-	A	A
	Mobile Sources	B	B	B	B
	Off-gassing	C	-	-	-
3	Total Unmitigated Emissions	B + C = D	B = D	A + B = D	A + B = D
4	Total Basic Mitigated Emissions	E	E	E	E
	BAAQMD Threshold	54 lb/day	54 lb/day	82 lb/day*	54 lb/day*
5	Basic Mitigated Emissions Exceed BAAQMD Threshold?	Is E > 54 lb/day? (If Yes, significant. Go to step 6. If No, less than significant)	Is E > 54 lb/day? (If Yes, significant. Go to step 6. If No, less than significant)	Is B* > 82 lb/day? (If Yes, significant. Go to step 6. If No, less than significant)	Is B* > 54 lb/day? (If Yes, significant. Go to step 6. If No, less than significant)
6	Total Additional Mitigated Emissions	F	F	F	F
7	Additional Mitigated Emissions Exceed BAAQMD Threshold?	Is F > 54 lb/day? (If Yes, significant and unavoidable. If No, less than significant with mitigation incorporated)	Is F > 54 lb/day? (If Yes, significant and unavoidable. If No, less than significant with mitigation incorporated)	Is F* > 82 lb/day? (If Yes, significant and unavoidable. If No, less than significant with mitigation incorporated)	Is F* > 54 lb/day? (If Yes, significant and unavoidable. If No, less than significant with mitigation incorporated)

* Applies to construction equipment exhaust only.

Notes: tpy = tons per year.; lb/day = pounds per day; NO_X = oxides of nitrogen; $PM_{2.5}$ = fine particulate matter with an aerodynamic resistance diameter of 2.5 micrometers or less; PM_{10} = respirable particulate matter with an aerodynamic resistance diameter of 10 micrometers or less; ROG = reactive organic gases;
Refer to Appendix D for support documentation.

8.1.2. Mitigating Criteria Air Pollutants and Precursors

Basic Construction Mitigation Measures

For all proposed projects, BAAQMD recommends the implementation of all *Basic Construction Mitigation Measures,* listed in Table 8-2*,* whether or not construction-related emissions exceed applicable *Thresholds of Significance*. Appendix B provides guidance on quantifying mitigated emission reductions using URBEMIS and RoadMod.

Table 8-2
Basic Construction Mitigation Measures Recommended for ALL Proposed Projects

1. All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day.
2. All haul trucks transporting soil, sand, or other loose material off-site shall be covered.
3. 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.
4. All vehicle speeds on unpaved roads shall be limited to 15 mph.
5. 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.
6. Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations [CCR]). Clear signage shall be provided for construction workers at all access points.
7. All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation.
8. Post a publicly visible sign with the telephone number and person to contact at the Lead Agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Air District's phone number shall also be visible to ensure compliance with applicable regulations.

Additional Construction Mitigation Measures

BAAQMD recommends that all proposed projects, where construction-related emissions would exceed the applicable *Thresholds of Significance*, implement the *Additional Construction Mitigation Measures*. Table 8-3 lists the *Additional Construction Mitigation Measures*. Appendix B contains more detailed guidance on emission reductions by source type (i.e., fugitive dust and exhaust) for quantification in URBEMIS and RoadMod.

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Table 8-3
Additional Construction Mitigation Measures Recommended for Projects with Construction Emissions Above the Threshold

1. All exposed surfaces shall be watered at a frequency adequate to maintain minimum soil moisture of 12 percent. Moisture content can be verified by lab samples or moisture probe.
2. All excavation, grading, and/or demolition activities shall be suspended when average wind speeds exceed 20 mph.
3. Wind breaks (e.g., trees, fences) shall be installed on the windward side(s) of actively disturbed areas of construction. Wind breaks should have at maximum 50 percent air porosity.
4. Vegetative ground cover (e.g., fast-germinating native grass seed) shall be planted in disturbed areas as soon as possible and watered appropriately until vegetation is established.
5. The simultaneous occurrence of excavation, grading, and ground-disturbing construction activities on the same area at any one time shall be limited. Activities shall be phased to reduce the amount of disturbed surfaces at any one time.
6. All trucks and equipment, including their tires, shall be washed off prior to leaving the site.
7. Site accesses to a distance of 100 feet from the paved road shall be treated with a 6 to 12 inch compacted layer of wood chips, mulch, or gravel.
8. Sandbags or other erosion control measures shall be installed to prevent silt runoff to public roadways from sites with a slope greater than one percent.
9. Minimizing the idling time of diesel powered construction equipment to two minutes.
10. The project shall develop a plan demonstrating that the off-road equipment (more than 50 horsepower) to be used in the construction project (i.e., owned, leased, and subcontractor vehicles) would achieve a project wide fleet-average 20 percent NO_X reduction and 45 percent PM reduction compared to the most recent ARB fleet average. Acceptable options for reducing emissions include the use of late model engines, low-emission diesel products, alternative fuels, engine retrofit technology, after-treatment products, add-on devices such as particulate filters, and/or other options as such become available.
11. Use low VOC (i.e., ROG) coatings beyond the local requirements (i.e., Regulation 8, Rule 3: Architectural Coatings).
12. Requiring that all construction equipment, diesel trucks, and generators be equipped with Best Available Control Technology for emission reductions of NOx and PM.
13. Requiring all contractors use equipment that meets CARB's most recent certification standard for off-road heavy duty diesel engines.

Assessing Mitigation Measures

Table 8-4 provides a summary of BAAQMD recommendations for assessing construction-related impacts and mitigation measures using URBEMIS. Detailed guidance is provided in Appendix B.

Table 8-4
URBEMIS Guidance for Assessing Construction-Related Impacts

URBEMIS Construction Input Parameter	Guidance Principle
Land Use Type and Size	• Select most applicable land use type. • Use the appropriate land use units.
Construction Schedule	• Use the earliest possible commencement date(s) if project-specific information is unknown. • Overlap phases that will or have the potential to occur simultaneously. • Check the selected number of work days per week to ensure an accurate number of construction work days for each phase.
Demolition Phase	• Use a separate demolition URBEMIS run if the land use size to be developed differs from the land use size to be demolished. • Demolition fugitive dust is based on maximum daily volume of building to be demolished. • Demolition construction equipment is based on acres of land use to be demolished (in *Enter Land Use Data* module).
Site Grading Phase	• Site grading construction equipment is based on maximum daily acres disturbed. • Enter project-specific maximum daily acres disturbed if known, otherwise URBEMIS assumes the maximum daily amount of acres disturbed is 25 percent of total acres disturbed.
Site Grading Fugitive Dust	• Select the appropriate fugitive dust quantification methodology based on the amount and type of project-specific information available. • The more specific grading information available will result in more accurate quantification of PM emissions.
Asphalt Paving Phase	• Acres to be asphalt paved are based on land use type and size (in *Enter Land Use Data* module). • Asphalt paving construction equipment is based on total acres to be paved. • Assumes asphalt paving occurs at equal rate throughout phase. • Account for excess asphalt paving requirements of project beyond default assumptions by adjusting the acres to be paved.
Architectural Coatings	• Assumes architectural coating operations occur at equal rate throughout phase.
Basic Construction Mitigation Measures	• All projects must implement Basic Construction Mitigation Measures, including those below the construction screening levels. • Use surrogate URBEMIS mitigation to account for Basic Construction Mitigation Measures' emission reductions.
Additional Construction Mitigation Measures	• Projects with construction emissions that exceed the thresholds are required to implement Additional Construction Mitigation Measures. • Use surrogate URBEMIS mitigation to account for Additional Construction Mitigation Measures' emission reductions.
Other	• For all construction phases, the more specific information available will result in more accurate emissions quantification. • When a specific construction schedule is unknown, all phases that could potentially overlap should be added to calculate maximum daily emissions.

8.2. GREENHOUSE GASES

The District does not have an adopted *Threshold of Significance* for construction-related GHG emissions. However, the Lead Agency should quantify and disclose GHG emissions that would occur during construction, and make a determination on the significance of these construction-generated GHG emission impacts in relation to meeting AB 32 GHG reduction goals. BAAQMD recommends using URBEMIS for proposed land use development projects and RoadMod for proposed projects that are linear in nature. Sources of construction-related GHGs only include exhaust, for which the same detailed guidance as described for criteria air pollutants and precursors should be followed.

The Lead Agency is encouraged to incorporate best management practices to reduce GHG emissions during construction, as applicable. Best management practices may include, but are not limited to: using alternative fueled (e.g., biodiesel, electric) construction vehicles/equipment of at least 15 percent of the fleet; using local building materials of at least 10 percent; and recycling or reusing at least 50 percent of construction waste or demolition materials.

8.3. TOXIC AIR CONTAMINANTS

BAAQMD recommends that the same community risk and hazard *Threshold of Significance* for project operations be applied to construction. However, BAAQMD suggests associated impacts should be addressed on a case-by-case basis, taking into consideration the specific construction-related characteristics of each project and proximity to off-site receptors, as applicable. The Air District recommends that for construction projects that are less than one year duration, Lead Agencies should annualize impacts over the scope of actual days that peak impacts are to occur, rather than the full year.

BAAQMD has developed guidance for estimating risk and hazards impacts entitled *Recommended Methods for Screening and Modeling Local Risks and Hazards* (May 2010) which also includes recommendations for mitigation of significant risk and hazards impacts. The Air District has also developed a Construction Risk Calculator model that provides distances from a construction site, based on user-provided project date, where the risk impacts are estimated to be less than significant; sensitive receptors located within these distances would be considered to have potentially significant risk and hazards impacts from construction. The Construction Risk Calculator can be downloaded from the Air District web site at: http://www.baaqmd.gov/Divisions/Planning-and-Research/CEQA-GUIDELINES.aspx.

8.3.1. Diesel Particulate Matter

Construction-related activities could result in the generation of TACs, specifically diesel PM, from on-road haul trucks and off-road equipment exhaust emissions. Due to the variable nature of construction activity, the generation of TAC emissions in most cases would be temporary, especially considering the short amount of time such equipment is typically within an influential distance that would result in the exposure of sensitive receptors to substantial concentrations. Concentrations of mobile-source diesel PM emissions are typically reduced by 70 percent at a distance of approximately 500 feet (ARB 2005). In addition, current models and methodologies for conducting health risk assessments are associated with longer-term exposure periods of 9, 40, and 70 years, which do not correlate well with the temporary and highly variable nature of construction activities. This results in difficulties with producing accurate estimates of health risk. Additionally, the implementation of the *Basic Construction Mitigation Measures* (table 8-2), which is recommended for all proposed projects, would also reduce diesel PM exhaust emissions.

However, these variability issues associated with construction do not necessarily minimize the significance of possible impacts.

The analysis shall disclose the following about construction-related activities:

1. Types of off-site receptors and their proximity to construction activity within approximately 1,000 feet;
2. Duration of construction period;
3. Quantity and types of diesel-powered equipment;
4. Number of hours equipment would be operated each day;
5. Location(s) of equipment use, distance to nearest off-site sensitive receptors, and orientation with respect to the predominant wind direction;
6. Location of equipment staging area; and
7. Amount of on-site diesel-generated $PM_{2.5}$ exhaust (assuming that all on-site diesel $PM_{2.5}$ exhaust is diesel PM) if mass emission levels from construction activity are estimated.

In cases where construction-generated emissions of diesel PM are anticipated to occur in close proximity to sensitive receptors for extended periods of time, lead agencies are encouraged to consult with BAAQMD.

8.3.2. Demolition and Renovation of Asbestos-Containing Materials

Demolition of existing buildings and structures would be subject to BAAQMD Regulation 11, Rule 2 (Asbestos Demolition, Renovation, and Manufacturing). BAAQMD Regulation 11, Rule 2 is intended to limit asbestos emissions from demolition or renovation of structures and the associated disturbance of asbestos-containing waste material generated or handled during these activities. The rule addresses the national emissions standards for asbestos along with some additional requirements. The rule requires the Lead Agency and its contractors to notify BAAQMD of any regulated renovation or demolition activity. This notification includes a description of structures and methods utilized to determine whether asbestos-containing materials are potentially present. All asbestos-containing material found on the site must be removed prior to demolition or renovation activity in accordance with BAAQMD Regulation 11, Rule 2, including specific requirements for surveying, notification, removal, and disposal of material containing asbestos. Therefore, projects that comply with Regulation 11, Rule 2 would ensure that asbestos-containing materials would be disposed of appropriately and safely. By complying with BAAQMD Regulation 11, Rule 2, thereby minimizing the release of airborne asbestos emissions, demolition activity would not result in a significant impact to air quality.

Because BAAQMD Regulation 11, Rule 2 is in place, no further analysis about the demolition of asbestos-containing materials is needed in a CEQA document. BAAQMD does recommend that CEQA documents acknowledge and discuss BAAQMD Regulation 11, Rule 2 to support the public's understanding of this issue.

8.3.3. Naturally Occurring Asbestos

Naturally occurring asbestos (NOA) was identified as a TAC in 1986 by ARB. NOA is located in many parts of California and is commonly associated with ultramafic rocks, according to the California Department of Geology's special publication titled Guidelines for Geologic Investigations of Naturally Occurring Asbestos in California. Asbestos is the common name for a group of naturally occurring fibrous silicate minerals that can separate into thin but strong and durable fibers. Ultramafic rocks form in high-temperature environments well below the surface of the earth. By the time they are exposed at the surface by geologic uplift and erosion, ultramafic rocks may be partially to completely altered into a type of metamorphic rock called serpentinite.

Sometimes the metamorphic conditions are right for the formation of chrysotile asbestos or tremolite-actinolite asbestos in the bodies of these rocks, along their boundaries, or in the soil.

For individuals living in areas of NOA, there are many potential pathways for airborne exposure. Exposures to soil dust containing asbestos can occur under a variety of scenarios, including children playing in the dirt; dust raised from unpaved roads and driveways covered with crushed serpentine; grading and earth disturbance associated with construction activity; quarrying; gardening; and other human activities. For homes built on asbestos outcroppings, asbestos can be tracked into the home and can also enter as fibers suspended in the air. Once such fibers are indoors, they can be entrained into the air by normal household activities, such as vacuuming (as many respirable fibers will simply pass through vacuum cleaner bags).

People exposed to low levels of asbestos may be at elevated risk (e.g., above background rates) of lung cancer and mesothelioma. The risk is proportional to the cumulative inhaled dose (quantity of fibers), and also increases with the time since first exposure. Although there are a number of factors that influence the disease-causing potency of any given asbestos (such as fiber length and width, fiber type, and fiber chemistry), all forms are carcinogens.

8.3.4. Mitigating Naturally Occurring Asbestos

BAAQMD enforces CARB's ATCM which regulates NOA emissions from grading, quarrying, and surface mining operations at sites which contain ultramafic rock. The provisions that cover these operations are found specifically in the California Code of Regulations, Section 93105. The ATCM for Construction, Grading, Quarrying and Surface Mining Operations was signed into State law on July 22, 2002, and became effective in the SFBAAB on November 19, 2002. The purpose of this regulation is to reduce public exposure to NOA from construction and mining activities that emit or re-suspend dust which may contain NOA.

The ATCM requires regulated operations engaged in road construction and maintenance activities, construction and grading operations, and quarrying and surface mining operations in areas where NOA is likely to be found, to employ the best available dust mitigation measures to reduce and control dust emissions. Tables 8-2 and 8-3 list a number of dust mitigation measures for construction.

BAAQMD's NOA program requires that the applicable notification forms from the Air District's website be submitted by qualifying operations in accordance with the procedures detailed in the ATCM Inspection Guidelines Policies and Procedures. The Lead Agency shall reference BAAQMD's ATCM Policies and Procedures to determine which NOA Notification Form is applicable to the proposed project (NOA Notification Forms).

Using the geologic map of the SFBAAB (Geologic Map), the Lead Agency shall discuss whether a proposed project would be located in "areas moderately likely to contain NOA." If a project would not involve earth-disturbing construction activity in one of these areas or would not locate receptors in one of these areas then it can be assumed that the project would not have the potential to expose people to airborne asbestos particles.

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PART III: ASSESSING & MITIGATING PLAN LEVEL IMPACTS

9. PLAN-LEVEL IMPACTS

Long range plans (e.g., general plan, redevelopment plans, specific plans, area plans, community plans, regional plans, congestion management plans, etc.) present unique challenges for assessing impacts. These plans often contain development strategies for 20-year, or longer, time horizons. They can also provide for a wide range of potential land uses and densities that accommodate all types of development. General plan updates and large specific plans nearly always require the Lead Agency to prepare an Environmental Impact Report (EIR). Due to the SFBAAB's nonattainment status for ozone and PM, and the cumulative impacts of growth on air quality, these plans almost always have significant, unavoidable adverse air quality impacts. CEQA requires the Lead Agency to evaluate individual as well as cumulative impacts of general plans, and all feasible mitigation measures must be incorporated within the proposed plan to reduce significant air quality impacts.

This chapter provides guidance on methods to evaluate air quality and climate change impacts of long-range plans prepared within the SFBAAB pursuant to CEQA. The term *general and area plan* refers broadly to discretionary planning activities which may include, but are not limited to the following: general plans, redevelopment plans, specific plans, area plans, community plans, congestion management plans, and annexations of lands and service areas. General and area plans are often subject to program-level analysis under CEQA, as opposed to project-level analysis. As a general principle, the guidance offered within this chapter should be applied to discretionary, program-level planning activities; whereas the project-level guidance offered in other chapters should be applied to individual project-specific approvals, such as a proposed development project.

Air quality impacts from future development pursuant to general or area plans can be divided into construction-related impacts and operational-related impacts. Construction-related impacts are associated with construction activities likely to occur in conjunction with future development allocated by the plan. Operational-related impacts are associated with continued and future operation of developed land uses, including increased vehicle trips and energy use.

Please note that the plan-level approach described here differs for greenhouse gas (GHG) impact assessments. The Air District recommends that when assessing GHG impacts for plans other than regional plans (transportation and air quality plans) and general plans, such as specific plans and area plans, the appropriate thresholds and methodology is the same as project-level GHG impact assessments described in Chapter 4.

Regional plan (transportation and air quality plans) impacts also are assessed differently because of their unique characteristics (regional plans do not establish land use designations) and are subject to a threshold of "no net increase in emissions."

9.1. CRITERIA AIR POLLUTANTS AND PRECURSOR EMISSIONS

To meet the *Threshold of Significance* for operational-related criteria air pollutant and precursor impacts for plans (other than regional plans), a proposed plan must satisfy the following criteria:

- Consistency with current air quality plan (AQP) control measures (this requirement applies to project-level as well as plan-level analyses).
- A proposed plan's projected VMT or vehicle trips (VT) (either measure may be used) increase is less than or equal to its projected population increase.

Air Quality Plan Control Measures

For this threshold, an air quality plan refers to clean air plans, state implementation plans (SIPS), ozone plans, and other potential air quality plans developed by BAAQMD. To date, the Air District's most current plan is the 2010 Clean Air Plan.

The following approach for incorporating current AQP control measures into a plan is also applicable for determining a project's consistency with an air quality plan. CEQA requires lead agencies to determine whether a project is consistent with all applicable air quality plans. In addition, the State CEQA Guidelines sample Environmental Checklist Form (Appendix G), poses the question: "Would the project conflict with or obstruct implementation of the applicable air quality plan?"

BAAQMD recommends that the agency approving a project where an air quality plan consistency determination is required analyze the project with respect to the following questions. If all the questions are concluded in the affirmative, and those conclusions are supported by substantial evidence, the Air District considers the project consistent with air quality plans prepared for the Bay Area.

1. Does the project support the primary goals of the AQP?

The primary goals of the 2010 Bay Area Clean Air Plan (CAP), the current AQP to date, are to:

- Attain air quality standards;
- Reduce population exposure and protecting public health in the Bay Area; and
- Reduce greenhouse gas emissions and protect the climate.

Any project (i.e. project or plan) that would not support these goals would not be considered consistent with the 2010 CAP. The recommended measure for determining project support of these goals is consistency with District-approved CEQA thresholds of significance. Therefore, if approval of a project would not result in significant and unavoidable air quality impacts, after the application of all feasible mitigation, the project would be considered consistent with the 2010 CAP.

2. Does the project include applicable control measures from the AQP?

Agencies approving projects should require that they include all air quality plan control measures that can feasibly be incorporated into the project design or applied as mitigation, or justify the reasons, supported by substantial evidence, why a measure or measures are not incorporated into the project. Projects that incorporate all feasible air quality plan control measures are considered consistent with the 2010 CAP.

The 2010 CAP contains 55 control measures aimed at reducing air pollution in the Bay Area. Along with the traditional stationary, area, mobile source and transportation control measures, the 2010 CAP contains a number of new control measures designed to protect the climate and promote mixed use, compact development to reduce vehicle emissions and exposure to pollutants from stationary and mobile sources. BAAQMD encourages project developers and lead agencies to incorporate these Land Use and Local Impact (LUM) measures and Energy and Climate measures (ECM) into proposed project designs and plan elements.

Refer to Volume II of the 2010 CAP Control Measure for a list of all the control measures and implementation guidance.

3. Does the project disrupt or hinder implementation of any AQP control measures?

If approval of a project would not cause the disruption, delay or otherwise hinder the implementation of any air quality plan control measure, it would be considered consistent with the 2010 CAP. Examples of how a project may cause the disruption or delay of control measures include a project that precludes an extension of a transit line or bike path, or proposes excessive parking beyond parking requirements.

Projected VMT and Population Growth

A proposed plan must demonstrate that its projected VMT or vehicle trips (VT) (either measure may be used) is less than or equal to its projected population increase to be considered to have a less than significant impact on criteria air pollutants and precursor emissions.

9.2. GREENHOUSE GASES

California's legislative mandate (AB 32) is to reduce total projected 2020 GHG emissions to 1990 levels, a reduction of approximately 30 percent. To achieve this target, future development must be planned and implemented in the most GHG-efficient manner possible. GHG-efficient development reduces vehicle miles traveled by supporting compact, dense, mixed-use, pedestrian- and bicycle-friendly, transit oriented development. State, regional and local agencies are strongly encouraged to address GHG emissions when updating and/or adopting long-range plans. For local jurisdictions, the general plan is perhaps the best venue for addressing GHG emissions in making meaningful progress toward attaining AB 32 goals while addressing CEQA requirements.

If a long-range plan includes goals, policies, performance standards, and implementation measures achieving GHG emission reductions that can be shown to meet and/or exceed AB 32 mandates, as outlined in Section 4.3, subsequent projects consistent with the plan could be relieved of performing GHG analysis as part of their CEQA compliance.

The *Threshold of Significance* for operational-related GHG impacts of plans employs either a GHG efficiency-based metric of 6.6 MT per SP per year of carbon dioxide equivalent (CO_2e), or a GHG Reduction Strategy option. Unlike the other plan-level thresholds that apply to the different

plans mentioned in Section 9 above, the GHG efficiency threshold may only be applied to general plans. A Lead Agency may also determine that this threshold is appropriate for a GHG Reduction Strategy's 2020 milestone target. GHG Reduction Strategies using this threshold with horizon years beyond 2020 should consider horizon-year goals consistent with climate stabilization predictions identified in the Governor's Executive Order S-03-05.

Step 1. GHG Reduction Strategy Approach

A long-range plan would be assumed to have a less than significant impact related to GHG emissions if the Lead Agency has a qualified GHG Reduction Strategy that is referenced and or integrated within the long-range plan. See Chapter 4 for qualifying criteria for a qualified GHG Reduction Strategy.

If the Lead Agency does not have a qualified GHG Reduction Strategy meeting established criteria, refer to Step 2.

Step 2. GHG Efficiency Approach – Emissions Quantification

BAAQMD recommends quantifying community-wide GHG emissions from a general or area plan through development of a GHG emissions inventory and projections report. The emissions inventory should be conducted for a base year at or before the current year of the plan; and should follow published ARB protocols for municipal and community-wide inventories (when available). The base year inventory should be expressed in terms of metric tons CO_2e emissions and account for municipal and community-wide emission sectors applicable in the jurisdiction such as, transportation, commercial, residential, water use and treatment, solid waste, and agriculture.

Section 4.3 contains additional guidance on preparing a GHG emissions inventory and projections report for a qualified GHG Reduction Strategy that should be applied to general plans as well. A range of tools and resources are available to assist lead agencies in completing inventories, including the Air District's *GHG Plan Level Reduction Strategy Guidance*, Intergovernmental Panel on Climate Change (IPCC) Emissions Inventory Guidelines, CCAR GRP, and ICLEI's Clean Air and Climate Protection (CACP) model. In all instances where regional, statewide or national data sources are available, the Air District recommends that local data be used if available and more accurate.

Step 3. Prepare Greenhouse Gas Emissions Projections

BAAQMD recommends preparing a community-wide GHG emission projection to identify the expected levels of GHG emissions for: 1) 2020 (i.e., the AB 32 benchmark year), and 2) the projected year of the plan build out. Two projections should be prepared for each year:

- A projection reflecting existing conditions (e.g., business-as-usual), and
- A projection that accounts for proposed policies, programs, and plans included within the general or area plan that would reduce GHG emissions from build-out of the plan.

The first projection should be used as the basis for evaluation of the no project alternative in the plan's EIR. The second projection should be used as the basis for evaluation of the proposed project. Additional projections corresponding to plan alternatives considered within the EIR should

also be prepared and included within the EIR's alternatives analysis. Examples of policies, performance standards and implementation measures are included in Section 9.5.

Where possible, emission projections should account for inherent improvements in energy and fuel efficiency, population and employment growth rates published by ABAG, VMT growth rates available from MTC, energy consumption growth rates available from California Energy Commission (CEC) planned expansions of municipal infrastructure or services, and anticipated statewide legislative requirements or mandates (e.g., Renewable Energy Portfolio, Green Building Code Standards, on-road vehicle emission regulations).

A range of GIS-based planning models are available that can assist lead agencies in completing projections, including Index, PLACE3S, UPlan, and the Sustainable Systems Integration Model (SSIM). The projection should be expressed in metric tons CO_2e emissions, and include the expected municipal and community-wide emissions across all sectors evaluated in the base year inventory.

BAAQMD encourages lead agencies to prepare similar projections for 2050 (the Executive Order S-03-05 benchmark year). As we approach the 2020 timeframe, BAAQMD will reevaluate this significance threshold to better represent progress toward 2050 goals. The Lead Agency should use the projected build-out emissions profile of the general or area plan as a benchmark to ensure that adoption of the plan would not preclude attainment of 2050 goals.

Step 4. Determine Planned Population and Employment Levels and Service Population

State law requires that general and area plans identify the planned density and intensity of land uses for all lands within the planning area established by the Lead Agency. These measures of density (typically dwelling units/acre) and intensity (typically floor-area ratios) are often translated into expected population and employment levels for estimating traffic impacts associated with the proposed plan. Most demand-based transportation models use population and employment to determine trip generation. Measures of population and employment are typically available for general and area plans. In evaluating GHG impacts, estimates of the number of residents and jobs anticipated in the general or area plan are required for 2020, the build-out year of the proposed plan, the no project alternative, and additional alternatives the Lead Agency is evaluating in the environmental review.

Service population (SP) is an efficiency-based measure used by BAAQMD to estimate the development potential of a general or area plan. SP is determined by adding the number of residents to the number of jobs estimated for a given point in time. For purposes of evaluating GHG impacts, SP estimates are required for 2020 and for the build-out year of the proposed plan.

Step 5. Compare Service Population to 2020 GHG Projections and Thresholds of Significance

The Lead Agency should divide the 2020 GHG emissions inventory by 2020 SP estimates to determine the per-SP emissions associated with the proposed general or area plan, the no project alternative, and additional alternatives the Lead Agency is evaluating. The Lead Agency should then compare these per-SP emissions to the significance thresholds identified in Chapter 2 (refer to Table 9-1).

Table 9-1 Example Plan-level Greenhouse Gas Emissions Analysis			
Step	Emissions Source	Year	Emissions (MT CO2e/yr)*
2	GHG Emissions Inventory (Community-wide and municipal)	Base year (e.g., 2007)	A
3	GHG Emissions Projections	2020	B
		GP Buildout (e.g., 2030)	C
4	Projected Service Population (population + employment)	SP	
	GHG/SP (2020)	B/SP (MT CO_2e/SP/yr)	
5	BAAQMD GHG/SP Threshold	6.6 (MT CO_2e/SP/yr)	
	Is B/SP > 6.6? (If Yes, Significant. Proceed to Step 6. If No, less than significant).		
*Letters "A", "B", and "C" are used to represent numeric values that would be obtained through conducting a community-wide emissions inventory and projections. Notes: CO_2e = carbon dioxide equivalent; MT = metric tons; yr = year, P = population, SP = service population. Refer to Appendix D for support documentation.			

If the estimated per-SP emissions exceed identified thresholds, the general or area plan would be considered to have a significant impact with respect to GHG emissions, and mitigation would be required.

Step 6. Mitigation Measures

General or area plans found to have a significant impact should implement all feasible mitigation measures to reduce impacts. Refer to Section 9.5 for examples of appropriate mitigation measures for operational impacts relative to GHG emissions. Mitigation measures identified through the environmental review process must be made into binding and enforceable policies and implementation programs within the long range plan.

9.3. LOCAL COMMUNITY RISK AND HAZARD IMPACTS[6]

For general and area plans to have a less-than-significant impact with respect to potential toxic air contaminants (TACs), special overlay zones need to be established around existing and proposed land uses that emit TACs. Special overlay zones should be included in proposed plan policies, land use maps, and implementing ordinances.

The *Thresholds of Significance* for plans with regard to community risk and hazard impacts are:

1. The land use diagram must identify:
    a. Special overlay zones around existing and planned sources of TACs;

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[6] The use of the receptor thresholds is discussed in section 2.8 of these Guidelines

b. Special overlay zones of at least 500 feet (or Air District-approved modeled distance) on each side of all freeways and high-volume roadways.

2. The plan must also identify goals, policies, and objectives to minimize potential impacts and create overlay zones for sources of TACs and receptors.

ARB's Land Use Handbook offers advisory recommendations for locating sensitive receptors near uses associated with TACs, such as freeways and high-traffic roads, commercial distribution centers, rail yards, ports, refineries, chrome platers, dry cleaners, gasoline stations, and other industrial facilities, to reduce exposure of sensitive populations. The Lead Agency should refer to this handbook when evaluating whether the proposed general or area plan includes adequate buffer distances between TAC sources and sensitive receptors.

9.3.1. Community Risk Reduction Plans

The goal of a Community Risk Reduction Plan (CRRP) would be to bring TAC and $PM_{2.5}$ concentrations for the entire community covered by the Plan down to acceptable levels as identified by the local jurisdiction and approved by the Air District. This approach provides local agencies a proactive alternative to addressing communities with high levels of risk on a project-by-project approach.

A qualified Community Risk Reduction Plan adopted by a local jurisdiction should include, at a minimum, the following elements:

(A) Define a planning area;

(B) Include base year and future year emissions inventories of TACs and PM2.5;

(C) Include Air District–approved risk modeling of current and future risks;

(D) Establish risk and exposure reduction goals and targets for the community in consultation with Air District staff;

(E) Identify feasible, quantifiable, and verifiable measures to reduce emissions and exposures;

(F) Include procedures for monitoring and updating the inventory, modeling and reduction measures in coordination with Air District staff; and

(G) Be adopted in a public process following environmental review.

Refer to Chapter 5 for additional guidance on preparing a CRRP. The Air District has also developed the *Community Risk Reduction Plan Methodology* guidance document, which can found at http://www.baaqmd.gov/Divisions/Planning-and-Research/CEQA-GUIDELINES.aspx.

9.4. ODOR IMPACTS

- For plans to have a less-than-significant impact, a plan must identify the location of existing and planned odor sources in the plan area. The plan must also include policies to reduce potential odor impacts in the plan area.

9.5. REGIONAL PLANS

Regional plans must demonstrate a no net increase in emissions to satisfy the *Threshold of Significance* for operational-related criteria air pollutant and precursor impacts, GHGs, and toxic air contaminants.

Regional plans include the Regional Transportation Plan prepared by the Metropolitan Transportation Commission (MTC) and air quality plans prepared by the Air District. In order to meet this threshold, these agencies must compare the regional plan's baseline emissions with its projected future emissions. This approach requires two comparative analyses:

a. Compare existing (base year) emissions with projected future year plus project emissions (base year/project comparison);

b. Compare projected future year emissions without the project with projected future year emissions plus the project (no project/project comparison).

A regional plan is considered less than significant if each scenario demonstrates that no net increase in emissions of criteria air pollutants and precursors, GHGs, and toxic air contaminants will occur.

9.6. MITIGATING PLAN-LEVEL IMPACTS

Plans often have significant, unavoidable adverse air quality impacts due to the SFBAAB's nonattainment status and the cumulative impacts of growth on air quality. In addition, plans generally have long-term planning horizons of twenty years or more. For these reasons, it is essential for plans to incorporate all feasible strategies and measures to reduce air quality impacts. Mitigation measures for plans are often broad in scope due to the long timeframe and comprehensive nature of general and area plan policies and programs.

This section contains mitigation measures recommended for plans prepared within the SFBAAB. Measures are identified by state-required general plan element, planning issue, development phase, and type of air quality impact. Proposed plans should incorporate mitigation measures applicable to their elements and planning issues.

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Plans are the appropriate place to establish community-wide air quality policies that reinforce regional air quality plans. Plans present opportunities to establish requirements for new construction, future development, and redevelopment projects within a community that will ensure new or revised plans do not inhibit attainment of state and national air quality standards and actually assist in improving local and regional air quality. Binding, enforceable mitigation measures identified through the environmental review process should be incorporated as policies and implementation programs within the plan to the

greatest extent feasible. Ideally, air quality related goals, policies, performance measures and standards should be incorporated within the context of the proposed project itself, rather than introduced as corrective actions within the proposed project's EIR. The list below is not intended to serve as an exhaustive list. The Air District also recommends that Lead Agencies refer to CAPCOA's *Model Policies for Greenhouse Gases in General Plans* (June 2009) for additional guidance (http://www.capcoa.org/modelpolicies/CAPCOA-ModelPolicies-6-12-09-915am.pdf).

9.6.1. Qualified Greenhouse Gas Reduction Strategy

Mitigation Measure or General/Area Plan Policy	Construction				Operational			
	CAPs	GHGs	TACs	Odors	CAPs	GHGs	TACs	Odors
Develop and adopt a comprehensive Qualified GHG Reduction Strategy that includes: baseline inventory of greenhouse gas emissions from all sources, greenhouse gas emissions reduction targets that are consistent with the goals of AB 32, and enforceable GHG emission reduction strategies and performance measures.		X				X		
Qualified GHG Reduction Strategy to include enforcement and monitoring tools to ensure regular review of progress toward the emission reduction targets, report progress to the public and responsible agencies, and revise the plan as appropriate.		X				X		

9.6.2. Land Use Element

Urban Form

Mitigation Measure or General/Area Plan Policy	Construction				Operational			
	CAPs	GHGs	TACs	Odors	CAPs	GHGs	TACs	Odors
Create and enhance landscaped greenway, trail, and sidewalk connections between neighborhoods, commercial areas, activity centers, and parks.					X	X		
Adopt policies supporting infill development					X	X		
Ensure that proposed land uses are supported by a multi-modal transportation system and that the land uses themselves support the development of the transportation system.					X	X		
Designate a central city core for high-density and mixed-use development.					X	X		
Discourage high intensity office and commercial uses from locating outside of designated centers or downtowns, or far from residential areas and transit stations.					X	X		
Provide financial incentives and density bonuses to entice development within the designated central city.					X	X		
Provide public education about benefits of well-designed, higher-density housing and relationships between land use and transportation.					X	X		

Compact Development

Mitigation Measure or General/Area Plan Policy	Construction				Operational			
	CAPs	GHGs	TACs	Odors	CAPs	GHGs	TACs	Odors
Achieve a jobs/housing balance or improve the jobs/housing ratio within the plan area.					X	X		
Create incentives to attract mixed-use projects to older commercial and industrial areas.					X	X		
Adopt incentives for the concurrent development of retail, office, and residential land uses within mixed-use projects or areas. Require mixed-use development to include ground-floor retail.					X	X		
Provide adaptive re-use alternatives to demolition of historic buildings. Provide incentives to prevent demolition of historic buildings.	X	X			X	X		
Facilitate lot consolidation that promotes integrated development with improved pedestrian and vehicular access.					X	X		
Reinvest in existing neighborhoods and promote infill development as a preference over new, greenfield development.					X	X		
Ensure that new development finances the full cost of expanding public infrastructure and services to provide an economic incentive for incremental expansion.					X	X		
Require new developments to extend sewer and water lines from existing systems or to be in conformance with a master sewer and water plan.	X	X			X	X		

Transit-oriented Design

Mitigation Measure or General/Area Plan Policy	Construction				Operational			
	CAPs	GHGs	TACs	Odors	CAPs	GHGs	TACs	Odors
Require all development projects proposed within 2,000 feet of an existing or planned light rail transit, commuter rail, express bus, or transit corridor stop, to incorporate site design measures that enhance the efficiency of the transit system.					X	X		
Develop transit/pedestrian-oriented design guidelines. Identify and designate appropriate sites during general plan updates and amendments.					X	X		
Plan areas within ¼-mile of locations identified as transit hubs and commercial centers for higher density development.					X	X		

Sustainable Development

Mitigation Measure or General/Area Plan Policy	Construction				Operational			
	CAPs	GHGs	TACs	Odors	CAPs	GHGs	TACs	Odors
Ensure new construction complies with California Green Building Code Standards and local green building ordinances.					X	X		
Promote re-use of previously developed property, construction materials, and/or vacant sites within a built-up area.					X	X		
Avoid development of isolated residential areas near hillsides or other areas where such development would require significant infrastructure investment or adversely impact biological resources.						X		
Require orientation of buildings to maximize passive solar heating during cool seasons, avoid solar heat gain during hot periods, enhance natural ventilation, and promote effective use of daylight. Orientation should optimize opportunities for on-site solar generation.					X	X		
Provide land area zoned for commercial and industrial uses to support a mix of retail, office, professional, service, and manufacturing businesses.					X	X		
Provide permitting incentives for energy efficient and solar building projects.					X	X		
Develop a joint powers agreement or other legal instrument that provides incentive for counties to discourage urban commercial development in unincorporated areas and promote urban infill and redevelopment projects.					X	X		

Activity Centers

Mitigation Measure or General/Area Plan Policy	Construction				Operational			
	CAPs	GHGs	TACs	Odors	CAPs	GHGs	TACs	Odors
Provide pedestrian amenities, traffic-calming features, plazas and public areas, attractive streetscapes, shade trees, lighting, and retail stores at activity centers.					X	X		
Provide for a mix of complementary retail uses to be located together to create activity centers and commercial districts serving adjacent neighborhoods.					X	X		
Permit upper-story residential and office uses in neighborhood shopping areas.					X	X		
Provide pedestrian links between commercial districts and neighborhoods.					X	X		
Provide benches, streetlights, public art, and other amenities in activity centers to attract pedestrians.					X	X		

Green Economy and Businesses

Mitigation Measure or General/Area Plan Policy	Construction				Operational			
	CAPs	GHGs	TACs	Odors	CAPs	GHGs	TACs	Odors
Work with businesses to encourage employee transit subsidies and shuttles from transit stations.					X	X		
Encourage businesses to participate in local green business programs.					X	X		
Offer incentives to attract businesses to city core and infill areas.					X	X		
Work to attract green businesses and promote local green job training programs.					X	X		
Support regional collaboration to strengthen the green economy.					X	X		
Provide outreach and education to local businesses on energy, waste, and water conservation benefits and cost savings.					X	X		
Support innovative energy technology companies.					X	X		

9.6.3. Circulation Element

Local Circulation

Mitigation Measure or General/Area Plan Policy	Construction				Operational			
	CAPs	GHGs	TACs	Odors	CAPs	GHGs	TACs	Odors
Create or reinforce a grid street pattern with small block sizes and maintain high connectivity within the roadway network.					X	X		
Implement circulation improvements that reduce vehicle idling, such as signal timing systems and controlled intersections.					X	X	X	
Consider alternatives such as increasing public transit or improving bicycle or pedestrian travel routes before funding transportation improvements that increase VMT.					X	X		
Require payment of transportation impact fees and/or roadway and transit improvements as a condition upon new development.					X	X		
Minimize use of cul-de-sacs and incomplete roadway segments.					X	X		
Actively promote walking as a safe mode of local travel, particularly for children attending local schools.					X	X		
Consult with school districts, private schools, and other operators to coordinate local busing, to expand ride-sharing programs, and to replace older diesel buses with low or zero emission vehicles.					X	X	X	
Evaluate all busing options as a preferential strategy to roadway improvements in the vicinity of schools to ease congestion.					X	X		
Establish public/private partnerships to develop satellite and neighborhood work centers for telecommuting.					X	X		
Employ traffic calming methods such as median landscaping and provision of bike or transit lanes to slow traffic, improve roadway capacity, and address safety issues.					X	X		
Support the use of electric vehicles where appropriate. Provide electric recharge facilities.					X	X		

Regional Transportation

Mitigation Measure or General/Area Plan Policy	Construction				Operational			
	CAPs	GHGs	TACs	Odors	CAPs	GHGs	TACs	Odors
Ensure that submittals of transportation improvement projects to be included in regional transportation plans (RTP, RTIP, CMP, etc.) are consistent with the air quality goals and policies of the general plan.					X	X		
Consult with adjacent jurisdictions to address the impacts of regional development patterns on the circulation system.					X	X		
Adopt a (or implement the existing) Transportation Demand Management Ordinance.					X	X		
Create financing programs for the purchase or lease of vehicles used in employer ride sharing programs.					X	X		
Consult with adjacent jurisdictions to maintain adequate service levels at shared intersections and to provide adequate capacity on regional routes for through traffic.					X	X		
Work to provide a strong paratransit system that promotes the mobility of all residents and educate residents about local mobility choices.					X	X		
Designate sites for park-and-ride lots. Consider funding of the park and ride lots as mitigation during CEQA review of residential development projects.					X	X		
Consult with appropriate transportation agencies and major employers to establish express buses and vanpools to increase the patronage of park and ride lots.					X	X		
Allow developers to reach agreements with auto-oriented shopping center owners to use commercial parking lots as park-and-ride lots and multimodal transfer sites.					X	X		

Parking

Mitigation Measure or General/Area Plan Policy	Construction				Operational			
	CAPs	GHGs	TACs	Odors	CAPs	GHGs	TACs	Odors
Reduce parking for private vehicles while increasing options for alternative transportation.					X	X		
Eliminate minimum parking requirements for new development.					X	X		
Establish commercial district parking fees.					X	X		
Require that parking is paid for separately and is not included in rent for residential or commercial space.					X	X		
Encourage parking sharing between different land uses.					X	X		
Encourage businesses to offer parking cash-outs to employees.					X	X		
Encourage parking assessment districts.					X	X		
Encourage car-share and bike-share programs and dedicated parking spaces in new development.					X	X		
Support preferential parking for low emission and carpool vehicles					X	X		

Bicycles and Pedestrians

Mitigation Measure or General/Area Plan Policy	Construction				Operational			
	CAPs	GHGs	TACs	Odors	CAPs	GHGs	TACs	Odors
Provide safe and convenient pedestrian and bicycle connections to and from activity centers, commercial districts, offices, neighborhoods, schools, other major activity centers.					X	X		
Ensure that non-motorized transportation systems are connected and not interrupted by impassable barriers, such as freeways.					X	X		
Provide pedestrian pathways that are well-shaded and pleasantly landscaped to encourage use.					X	X		
Consult with transit providers to increase the number of bicycles that can be accommodated on buses.					X	X		
Provide crosswalks and sidewalks along streets that are accessible for people with disabilities and people who are physically challenged.					X	X		
Prohibit on-street parking to reduce bicycle/automobile conflicts in appropriate target areas.					X	X		
Prohibit projects that impede bicycle and walking access.					X	X		
Retrofit abandoned rail corridors as segments of a bikeway and pedestrian trail system.					X	X		
Require commercial developments and business centers to include bicycle amenities in building such as bicycle racks, showers, and lockers.					X	X		

Regional Rail Transit

Mitigation Measure or General/Area Plan Policy	Construction				Operational			
	CAPs	GHGs	TACs	Odors	CAPs	GHGs	TACs	Odors
Support regional rail service and consult with rail operators to expand services.					X	X		
Create activity centers and transit-oriented development projects near transit stations.					X	X		

Local and Regional Bus Transit

Mitigation Measure or General/Area Plan Policy	Construction				Operational			
	CAPs	GHGs	TACs	Odors	CAPs	GHGs	TACs	Odors
Give funding preference to investment in public transit over investment in infrastructure for private automobile traffic.					X	X		
Establish a local shuttle service to connect neighborhoods, commercial centers, and public facilities to rail transit.					X	X		
Empower seniors and those with physical disabilities who desire maximum personal freedom and independence of lifestyle with unimpeded access to public transportation.					X	X		
Provide transit shelters that are comfortable, attractive, and accommodate transit riders. Ensure that shelters provide shade, route information, benches and lighting.					X	X		
Design all arterial and collector streets planned as transit routes to allow for the efficient operation of public transit.					X	X		
Require transit providers to coordinate intermodal time schedules					X	X		

9.6.4. Conservation Element

Municipal Operations

Mitigation Measure or General/Area Plan Policy	Construction				Operational			
	CAPs	GHGs	TACs	Odors	CAPs	GHGs	TACs	Odors
Replace existing City vehicles with ultra-low or zero emission vehicles and purchase new low emission vehicles.					X	X		
Require that all new government buildings, and all major renovations and additions, meet identified green building standards.					X	X		
Install cost-effective renewable energy systems on all city buildings and purchase remaining electricity from renewable sources.					X	X		
Support the use of teleconferencing in lieu of city/county employee travel to conferences and meetings when feasible.					X	X		
Require city/county departments to set up telecommuting programs as part of their trip reduction strategies.					X	X		
Require environmentally responsible government purchasing. Require or give preference to products that reduce or eliminate indirect GHG emissions.						X		
Investigate the feasibility of using solar (photovoltaic) street lights instead of conventional street lights to conserve energy.					X	X		
Support investment in cost-effective land use and transportation modeling and geographic information system technology.					X	X	X	X
Install LED lighting for all traffic light systems.						X		
Implement a timed traffic light system to reduce idling.					X	X		

Air Quality – Sensitive Receptors

Mitigation Measure or General/Area Plan Policy	Construction				Operational			
	CAPs	GHGs	TACs	Odors	CAPs	GHGs	TACs	Odors
Develop and adopt a comprehensive Community Risk Reduction Plan that includes: baseline inventory of TAC and $PM_{2.5}$ emissions from all sources, emissions reduction targets, and enforceable emission reduction strategies and performance measures. Community Risk Reduction Plan to include enforcement and monitoring tools to ensure regular review of progress toward the emission reduction targets, report progress to the public and responsible agencies, and revise the plan as appropriate.			X				X	
Require residential development projects and projects categorized as sensitive receptors to be located an adequate distance from existing and potential sources of TACs and odors.				X			X	X
Require new air pollution point sources such as, but not limited to, industrial, manufacturing, and processing facilities to be located an adequate distance from residential areas and other sensitive receptors.	X		X	X	X		X	X
Consult with BAAQMD to identify TAC sources and determine the need for and requirements of a health risk assessment for proposed developments.			X	X			X	X
Consult with project proponents during the pre-application review process to avoid inappropriate uses at affected sites and during the environmental review process for general plan amendments and general plan updates.					X		X	X
Require project proponents to prepare health risk assessments in accordance with BAAQMD-recommended procedures as part of environmental review when the proposed project has associated air-toxic emissions.			X				X	
Designate adequate industrial land in areas downwind and well-separated from sensitive uses.							X	X
Designate non-sensitive land uses for areas surrounding industrial sites.					X		X	X
Protect vacant industrial sites from encroachment by residential or other sensitive uses through appropriate zoning.					X		X	X
Require indoor air quality equipment, such as enhanced air filters, to be installed at schools, residences, and other sensitive receptor uses located near pollution sources.							X	X
Quantify the existing and added health risks to new sensitive receptors or for new sources.							X	
Utilize pollution absorbing trees and vegetation in buffer areas.					X	X	X	

Air Quality – PM_{10} and Dust Control

Mitigation Measure or General/Area Plan Policy	Construction				Operational			
	CAPs	GHGs	TACs	Odors	CAPs	GHGs	TACs	Odors
Include PM_{10} control measures as conditions of approval for subdivision maps, site plans, and grading permits.	X				X			
Minimize vegetation removal required for fire prevention.	X				X			
Require alternatives to discing, such as mowing, to the extent feasible. Where vegetation removal is required for aesthetic or property maintenance purposes, encourage or require alternatives to discing.	X	X			X	X		
Require subdivision designs and site planning to minimize grading and use landform grading in hillside areas.	X							
Condition grading permits to require that graded areas be stabilized from the completion of grading to commencement of construction.	X							
Require all access roads, driveways, and parking areas serving new commercial and industrial development to be constructed with materials that minimize particulate emissions and are appropriate to the scale and intensity of use.	X							
Develop a street cleaning program aimed at removing heavy silt loadings from roadways that result from sources such as storm water runoff and construction sites.	X				X			
Pave shoulders and pave or landscape medians. Curb and gutter installation may provide additional benefits where paving is contiguous to the curb.	X	X			X	X		

Water Conservation

Mitigation Measure or General/Area Plan Policy	Construction				Operational			
	CAPs	GHGs	TACs	Odors	CAPs	GHGs	TACs	Odors
Require residential remodels and renovations to improve plumbing fixture and fixture-fitting water efficiency by an established amount above the California Building Standards Code water efficiency standards.		X						
Provide water use audits to identify conservation opportunities and financial incentives for adopting identified efficiency measures.		X						
Require use of native and drought-tolerant plants, proper soil preparation, and efficient irrigation systems for landscaping.		X				X		
Maximize use of native, low-water plants for landscaping of areas adjacent to sidewalks or other impermeable surfaces.		X				X		
Increase use of recycled and reclaimed water for landscaping projects.		X				X		
Adopt a water-efficient landscaping ordinance and implement the Bay-Friendly Landscaping Guidelines established by StopWaste.org.						X		
Provide public water conservation education.						X		
Reduce pollutant runoff from new development through use of Best Management Practices.	X	X	X		X	X	X	
Minimize impervious surfaces and associated urban runoff pollutants in new development and reuse projects.	X	X	X		X	X	X	
Utilize permeable surfaces and green roof technologies where appropriate.					X	X	X	

Energy Conservation

Mitigation Measure or General/Area Plan Policy	Construction				Operational			
	CAPs	GHGs	TACs	Odors	CAPs	GHGs	TACs	Odors
Conduct energy efficiency audits of existing buildings by checking, repairing, and readjusting heating, ventilation, air conditioning, and lighting, water heating equipment, insulation and weatherization. Offer financial incentives for adoption of identified efficiency measures.		X				X		
Require implementation of energy-efficient design features in new development, including appropriate site orientation, exceedance of Title 24, use of light color roofing and building materials, and use of evergreen and wind-break trees to reduce heating and cooling fuel consumption.		X				X		
Adopt residential and commercial energy efficiency retrofit ordinances that require upgrades as a condition of issuing permits for renovations or additions, and on the sale of residences and buildings.		X				X		
Facilitate cooperation between neighboring development projects to use on-site renewable energy supplies or combined heat and power co-generation facilities.		X				X		
Develop a comprehensive renewable energy financing and informational program for residential and commercial uses.		X				X		
Partner with community services agencies to fund energy efficiency projects for low income residents.		X				X		
Encourage the installation of energy efficient fireplaces in lieu of normal open-hearth fireplaces. Prohibit installation of wood burning devices.	X	X			X	X		
Provide natural gas lines or electrical outlets to backyards to encourage the use of natural gas or electric barbecues, and electric gardening equipment.	X				X			
Implement Community Choice Aggregation (CCA) for renewable electricity generation.		X				X		

Solid Waste

Mitigation Measure or General/Area Plan Policy	Construction				Operational			
	CAPs	GHGs	TACs	Odors	CAPs	GHGs	TACs	Odors
Achieve established local and regional waste-reduction and diversion goals. Adopt more stringent waste reduction goals.		X				X		
Establish programs that enable residents to donate or recycle surplus furniture, old electronics, clothing, and other household items.		X				X		
Establish methane recovery in local landfills and wastewater treatment plants to generate electricity.		X				X		
Participate or initiate a composting program for restaurants and residences.						X		
Implement recycling programs for businesses and construction waste.	X	X			X	X		
Prohibit styrofoam containers and plastic bag use by businesses.					X	X		

9.6.5. Open Space Element

Community Forestry

Mitigation Measure or General/Area Plan Policy	Construction				Operational			
	CAPs	GHGs	TACs	Odors	CAPs	GHGs	TACs	Odors
Require inclusion of low VOC-emitting street trees and landscaping for all development projects.		X				X		
Require that trees larger than a specified diameter that are removed to accommodate development must be replaced at a set ratio.		X				X		
Provide adequate funding to manage and maintain the existing community forest, including sufficient funds for tree planting, pest control, scheduled pruning, and removal and replacement of dead trees.		X				X		
Provide public education regarding the benefits of street trees and the community forest.		X				X		

Sustainable Agriculture

Mitigation Measure or General/Area Plan Policy	Construction				Operational			
	CAPs	GHGs	TACs	Odors	CAPs	GHGs	TACs	Odors
Require agricultural practices be conducted in a manner that minimizes harmful effects on soils, air and water quality, and marsh and wildlife habitat. Sustainable agricultural practices should be addressed in the Qualified GHG Reduction Strategy to address climate change effects if relevant.	X	X			X	X		
Preserve forested areas, agricultural lands, wildlife habitat and corridors, wetlands, watersheds, groundwater recharge areas and other open spaces that provide carbon sequestration benefits.	X	X			X	X		
Establish a mitigation program for establishing conservation areas. Impose mitigation fees on development of such lands and use funds generated to protect existing, or create replacement, conservation areas.	X	X			X	X		
Require no-till farming, crop rotation, cover cropping, and residue farming.	X	X			X	X		
Require the use of appropriate vegetation within urban-agricultural buffer areas.		X				X		
Protect grasslands from conversion to non-agricultural uses.	X	X			X	X		
Support energy production activities that are compatible with agriculture, including biogas, wind and solar.		X				X		
Allow alternative energy projects in areas zoned for agriculture or open space where consistent with primary uses.		X				X		
Provide spaces within the community suitable for farmers markets.						X		
Promote local produce and garden programs at schools.						X		

Parks and Recreation

Mitigation Measure or General/Area Plan Policy	Construction				Operational			
	CAPs	GHGs	TACs	Odors	CAPs	GHGs	TACs	Odors
Expand and improve community recreation amenities including parks, pedestrian trails and connections to regional trail facilities.						X		
Require payment of park fees and/or dedication and provision of parkland, recreation facilities and/or multi-use trails as a condition upon new development.		X				X		
Encourage development of pocket parks in neighborhoods. Improve equal accessibility to park space across communities.		X				X		
Encourage joint use of parks with schools and community centers and facilities.		X				X		

9.6.6. Housing Element

Affordable Housing

Mitigation Measure or General/Area Plan Policy	Construction				Operational			
	CAPs	GHGs	TACs	Odors	CAPs	GHGs	TACs	Odors
Ensure a portion of future residential development is affordable to low and very low income households.		X				X		
Target local funds, including redevelopment and Community Development or Energy Efficiency Block Grant resources, to assist affordable housing developers in incorporating energy efficient designs and features.						X		
Adopt minimum residential densities in areas designated for transit-oriented, mixed use development to ensure higher density in these areas.					X	X		
Consult with the Housing Authority, transit providers, and developers to facilitate construction of low-income housing developments that employ transit-oriented and pedestrian-oriented design principles.					X	X		
Offer density-bonus incentives for projects that provide for infill, mixed use, and higher density residential development.					X	X		

9.6.7. Safety Element

Traffic Safety

Mitigation Measure or General/Area Plan Policy	Construction				Operational			
	CAPs	GHGs	TACs	Odors	CAPs	GHGs	TACs	Odors
Facilitate traffic safety for motorists and pedestrians through proper street design and traffic monitoring.					X	X		
Require traffic control devices, crosswalks, and pedestrian-oriented lighting within design of streets, sidewalks, trails, and school routes.					X	X		

A. CONSTRUCTION ASSESSMENT TOOLS

High Level Haulage Input Worksheet
High Level of Detail Fugitive Dust Quantification Method

Instructions: When using the *High Level of Detail* quantificaiton method to calculate fugitive dust emissions from cut/fill activities, BAAQMD recommends using this worksheet to calculate the on- and off-site haulage inputs for URBEMIS. If a project would involve both on-site and off-site cut/fill operations, the user should create two separate High Level Haulage Input Worksheets (i.e., one worksheet calculation for on-site and one for off-site).

Project Name:

Grading Activity/Phase:

User inputs
Input to use in URBEMIS
Calculation (do not change)

Cut/Fill Operations

Description	Amount	Units	Notes
Total Cut/Fill Volume	1,800	cubic yards	Enter information
Months of Activity	2	months	Enter information
Days of Activity	44	days	
Daily Cut/Fill Volume	40.91	cubic yards/day	

Soil Density by Soil Type and Condition

Soil Type	Bulk Density (grams/cubic centimeter)	Density (pounds/cubic yard)	Density (tons/cubic yard)
Sandy	1.69	2,849	1.42
Loamy Coarse-Loamy	1.63	2,747	1.37
Loamy Fine-Loamy	1.60	2,697	1.35
Loamy Coarse-Silty	1.60	2,697	1.35
Loamy Fine-Silty	1.54	2,596	1.30
Clayey 25-25% clay	1.49	2,511	1.26
Clayey >45% clay	1.39	2,343	1.17

Source: U.S. Department of Agriculture, Natural Resources Conservation Service, 2007. National Soil Survey Handbook, title 430-VI. [Online] Available at <http://soils.usda.gov/technical/handbook/>.

URBEMIS 2007 Ton-Mile Calculation

Description	Amount	Units	Notes
Soil Type	Loamy Coarse-Loamy		Use drop-down menu to select soil type. Assume Sandy unless project-specific soil type is known.
Soil Density	1.37	tons/cubic yard	Enter project specific soil density if known
Haul Distance (Round Trip On-Site)	0.04	miles	Enter distance
Ton-Mile per Day	2.25	ton-miles/day	

Notes:
On-site ton-mile assumes cut/fill volume is moved by scrapers.
Off-site ton-mile assumes cut/fill volume is moved by haul trucks.

URBEMIS Construction Modeling Data Needs/Requests

1) Construction Schedule

Land use type and size to be developed
Commencement and buildout date
Duration and start date for each construction phase (e.g., demolition, grading, building construction)
Identify any potential or planned overlap in phases

Note: If project will be built out in multiple phases, provide information above for each phase.

2) Demolition

Commencement date and duration of activities
Total volume to be demolished
Maximum daily volume to be demolished
Haul truck capacity and distance to disposal site (URBEMIS defaults provided)
Demolition equipment required (URBEMIS defaults provided)

Note: URBEMIS estimates demolition construction equipment based on the land use being developed.

3) Grading (Mass and Fine)

Commencement date and duration of activities
Maximum daily acres disturbed (URBEMIS defaults provided)
Volume of material to be cut and/or filled (cubic yards)
Volume of material to be exported and/or exported (cubic yards)
Construction equipment required

Note: URBEMIS estimates grading construction equipment based on maximum daily acres disturbed.

4) Fugitive Dust

A) Method 1 (Default)
Maximum daily acres disturbed (URBEMIS defaults provided)

B) Method 2 (Low Level of Detail)
Duration of cut/fill operations
Volume of material to be cut and/or filled (cubic yards)
Origin of soil material (i.e., on-site or off-site)

C) Method 3 (Medium Level of Detail)
Duration of cut/fill operations
Number of scrapers or haul trucks operating per day
Hours of operation for each scraper or haul truck (scraper hours and haul truck hours)

D) Method 4 (High Level of Detail)
Duration of cut/fill operations
Volume of material to be cut and/or filled (cubic yards)
Bulk density of material (i.e., tons per cubic yard)
Round trip distance required to move materials on-site (on-site miles only)

5) Asphalt Paving

Commencement date and duration of activities
Total acres to be paved
Construction equipment required

Note: URBEMIS estimates asphalt paving construction equipment based on total acres to be paved.

6) Architectural Coatings

Commencement date and duration of activities

B. AIR QUALITY MODELING INSTRUCTIONS (URBEMIS)

This section provides detailed instructions for and examples of air quality modeling of operational and construction-related emissions pursuant to the methodological recommendations in this guide.

OPERATIONAL-RELATED EMISSIONS

URBEMIS Input Parameters

URBEMIS provides default values for Bay Area specific modeling parameters. Users may use the default values or provide project specific information when possible for more accurate emission quantification. BAAQMD-recommended input parameters and data requirements along with general URBEMIS user information for each operational-related activity are described below. Refer to the URBEMIS User's Guide and the BAAQMD Greenhouse Gas Model User's Manual (referred to collectively as the "User's Guide" below) for more detailed information.

Table B-1
URBEMIS Input Parameters for Operation Emissions

Operational Input Parameters	Guidance Principle
Air District	Bay Area Air District
Analysis Year	Earliest possible year when project would be operational
Land Use Type and Units	Based on project description
Trip Rate	From project traffic study, local trip rates, or ITE Trip Generation Manual
Project Location	Urban
Road Dust	Category should not be turned off but can be modified if project information is known
Pass-by Trips	See User's Guide for further instructions
Double Counting Correction	See User's Guide for further instructions
Percentage of Land Uses using Natural Gas	100 percent for both residential and nonresidential development
Persons per Residential Unit (Consumer Products)	Based on estimated number of residents
All Other URBEMIS Inputs	Use default values, unless project-specific data is available. See User's Guide for further instructions[1]

[1] The rationale for changing default values should be disclosed in the CEQA document

Land Use Type and Size

Choose each individual land use type (e.g., single family housing, apartment high rise, regional shopping center, or office park) that is most applicable to the proposed development project in the *Enter Land Use Data* module and enter the size of the project (e.g., acres, thousand square feet [ksf], students, dwelling units [du], rooms, pumps, rooms, or employees). Ensure that the unit type for the project-specific data is consistent with the unit type selected in URBEMIS. By default, URBEMIS estimates the trip generation rates for each land use type based on equations included in the ITE Trip Generation Manual. The trip rate represents the number of daily trips generated by a particular land use type by size. Override the default trip rate if project-specific data is available from the transportation analysis.

URBEMIS estimates the trip rate differently for residential land use types than for non-residential land use types. For residential land use types, URBEMIS adjusts the default trip rate based on residential density (i.e., dwelling units/residential acre). Overriding the default value for the number of acres for a residential land use type would automatically result in a change in the trip rate value. If both the number of acres and the trip rates for a residential development are known, enter the unit amount for the land use first, then adjust the acreage second, and then adjust the trip rate last. Select the *Submit* button after completing the *Enter Land Use Data* module.

For nonresidential land use types, URBEMIS uses a default trip rate value that is directly based on the unit amount entered into the *Enter Land Use Data* module. URBEMIS also assumes a Floor Area Ratio (FAR) of 0.5 for all nonresidential uses. The FAR is the ratio of the total floor area of a building to the size of the parcel on which it is located. Override the value in the acres data field based on the FAR for the proposed nonresidential land uses. URBEMIS does not adjust the default trip rate if the acre value is adjusted.

The *Enter Land Use Data* module includes a default worker commute trip percentage for all nonresidential land use types, which is used to estimate percentages of other commercial trip types in the *Enter Operational Data* module. The *Enter Land Use Data* module also contains default percentages of primary, diverted, and pass-by trips for all land use types, residential and non-residential. Primary trips are trips made for the specific purpose of visiting the generator and URBEMIS assumes that primary trips travel a full trip length; pass-by trips are trips made as intermediate stops on the way from an origin to another trip destination; and diverted-linked trips are trips attracted from the traffic volume on roadways in the vicinity of the generator but which require a diversion from that roadway to another roadway to gain access to the site. Pass-by and diverted-linked trips are assigned a shorter trip distance than primary trips. URBEMIS assumes that pass-by trips result in virtually no extra travel, with an assumed trip length of 0.1 mile. Diverted-linked trip lengths are assumed to equal 25 percent of the primary trip length. URBEMIS allows users to edit these data fields. URBEMIS incorporates this information for estimation of mobile-source emissions only if the check box for the Pass-by Trips category in the *Enter Operational Data* module is selected. When not selected, URBEMIS assumes all trips are primary trips. BAAQMD recommends reviewing the User's Guide for more information about when to use this feature. Additional discussion about pass-by trips is provided under the *Enter Operational Data* module guidance below.

When estimating emissions for a type of land use that is not listed in URBEMIS, select a similar land use type or add a new land use type on the Blank tab of the *Enter Land Use Data* module. When selecting a similar nonresidential land use type as a proxy, consider the worker commute trip percentage and the primary, diverted, and pass-by trip values. The name of the land use type is unimportant and can be overridden with new text if desired. BAAQMD recommends using one of the types of residential land uses listed in URBEMIS as a proxy when analyzing any type of unique residential project.

For unique nonresidential types of land uses, BAAQMD recommends either using another nonresidential land use type as a proxy or using a Blank land use type. If a new land use type is analyzed using a row on the Blank tab of the *Enter Land Use Data* module, enter a trip rate as URBEMIS does not provide default trip rate on the Blank tab. BAAQMD recommends using a trip rate from the ITE Trip Generation Manual, if an appropriate trip rate is available. If an applicable trip generation rate is not available, the Lead Agency should make a good faith effort to derive a trip generation rate for the proposed project.

Operational Data

The *Enter Operational Data* module allows users to estimate vehicle exhaust emissions from trips (and associated VMT) generated by a project. The module consists of seven operational

parameter categories including *Year & Vehicle Fleet*, *Trip Characteristics*, *Temperature Data*, *Variable Starts*, *Road Dust*, *Pass-by Trips*, and *Double-Counting Correction*. The first five operational categories are all needed to calculate vehicle exhaust emissions and; therefore, cannot be turned off. Three of the seven operational categories can be turned off: *Road Dust*, *Pass-by Trips*, and *Double-Counting Correction*.

Guidance regarding each of the operational categories is provided below. In general, most of the default values for these seven source categories do not need to be changed, except where otherwise noted.

Year & Vehicle Fleet

The *Year & Vehicle Fleet* category allows users to specify the operational year for the project. Use the earliest possible year when the project would be operational to estimate worst-case operational emissions. Be aware that changing the project start year also changes the vehicle fleet mix. The default fleet mix values (i.e., *Fleet %, Vehicle Type*, *Non-Catalyst*, *Catalyst*, *Diesel*) are based on values from EMFAC using the year and the location of the project that is specified when users creates a new project in URBEMIS. The fleet mix should be modified only if it is known that the fleet mix for a project would be different from the average vehicle fleet mix in the project area. In that situation, select *Keep Current Fleet Mix When Changing Years*. Changes to the fleet mix data should be based on information provided by the transportation analysis and/or assumptions that are disclosed in the CEQA document. For instance, the fleet mix of motor vehicle trips generated by a school project would likely consist of a higher percentage of school buses and a lower percentage of motor homes and motorcycles than the URBEMIS average.

Trip Characteristics

The *Trip Characteristics* category includes trip data such as average speed, trip percentages, urban and rural trip lengths for different trip types. The trip percentages for home-based trips can be modified; however, it is not possible to modify the same for commercial-based trips, which URBEMIS calculates using the worker commute trip percentage entered in the *Enter Land Use Data* module. URBEMIS uses either the urban or rural trip length values depending on whether *Urban Project* or *Rural Project* is selected on the same screen. In general, the *Urban Project* option should be selected for most land use development projects under BAAQMD's jurisdiction. The trip length values can be changed if supported by information produced in a transportation analysis and/or reasonable assumptions about the project. For instance, the trip length for a proposed school might be adjusted according to the spatial distribution of the households that would be served by that school, particularly if the majority of trip generation would consist of parents driving their children to the school.

In addition to trip rate adjustments based on residential density, URBEMIS allows for modifications to vehicle trips based on other project characteristics. If specific project information is available for any land use type it should be reflected in the URBEMIS inputs. The table "URBEMIS Measures – Operational (Mobile-source) Measures" in Section 4.2 lists available measures to alter the trip rate to better reflect specific conditions. For example, if a project includes access to transit, URBEMIS trip rates can be adjusted between 0% and 15%. A 15% reduction in vehicle trips due to transit access would only be appropriate for a project that offers access to exceptional transit service. See the User's Guide for further instructions on all adjustments. Lead agencies must discuss and justify their reductions with substantial evidence.

Temperature Data

The *Temperature Data* category contains default ambient winter and summer temperature values which are used to estimate winter and summer emissions, respectively. The default temperature values in these data fields are specific to SFBAAB and should only be modified in consultation with BAAQMD.

Variable Starts
The *Variable Starts* parameter category shows the percentage of vehicles in several time classes (minutes since the vehicle engine was turned off) for the six trip types defined in the *Trip Characteristics* parameter category. This information is derived from the applicable EMFAC file and should only be modified in consultation BAAQMD.

Road Dust
The *Road Dust* parameter category allows users to specify the distribution of vehicle travel between paved and unpaved roads. This category is used to calculate entrained road dust emissions due to vehicle travel on paved and unpaved surfaces. Do not turn this category off, and users can adjust the percentage of travel on paved and unpaved roads if detailed project information is known.

Pass-by Trips
The *Pass-by Trips* parameter category can only be turned on or off. When selected, this category divides all the project-generated trips into primary, pass-by, and diverted-linked trips (entered as percentages in *Enter Land Use Data* module). When this category is not selected, URBEMIS assumes 100 percent of the project-generated trips are primary trips. Pass-by trips are trips made as intermediate stops on the way from an origin to a primary trip destination. URBEMIS accounts for these trips by setting the trip length to 0.1 miles for each pass-by trip. These trips are most important for retail and commercial land uses, such as gas stations and fast food restaurants. This option is not applicable to all land use types. For example, most of the trips to and from a *Warehouse* are typically expected to be primary trips and the *Pass-by Trips* option should not be used. This category check box should not be selected unless the percentage of pass-by trips is supported by a transportation analysis or a set of reasonable assumptions discussed in the CEQA document. If the trip length values in the *Trip Characteristics* category or the trip rate values in the Enter Land Use Data module are overwritten using information provided by a transportation analysis, be aware of whether the traffic data incorporated the occurrence of pass-by trips. If the *Pass-By Trips* checkbox is selected then the Lead Agency should discuss its reasoning for assuming that some of the project-generated vehicle trips would be considered pass-by trips.

Double-Counting Correction
The *Double-Counting Correction* parameter category is designed to account for internal trips between residential and nonresidential land uses. The *Double-Counting Correction* is applicable to mixed-use projects that include both residential and nonresidential land use types in the *Enter Land Use Data* module. For example, a residential trip and a retail trip generated by a mixed-use project may be the same trip. Users have the option of entering the number of internal trips between residential and nonresidential land uses in the *Enter the gross internal trip* as desired. The value entered represents the number of internal trips that would not be included in the emissions estimate. This category should not be used unless the transportation analysis or local transportation studies contain data to support the correction factor. In some cases, the transportation analysis may report project-specific trip generation that is already corrected for internal trips. Consult with a traffic engineer to determine the appropriate method to account for internal trips. The *Double-Counting Correction* checkbox should not be selected if detailed project information is unknown.

Area Source
The *Enter Area Source Data* module allows users to adjust the five area-source emission categories including, natural gas fuel combustion, hearth fuel combustion, landscape fuel combustion, consumer products, and architectural coatings. The natural gas, hearth, and landscape maintenance categories relate to on-site fuel combustion and the consumer products and architectural coatings categories address on-site evaporative emissions.

Guidance regarding each of the area-source categories is provided below. In general, most of the default values for these five source categories do not need to be changed except where otherwise noted in this guide.

Natural Gas Fuel Combustion
Parameters in the *Natural Gas Fuel Combustion* category are used to estimate the natural gas combustion emissions from space and water heating. On the *Natural Gas* tab the default percentage for land uses using natural gas should be changed to 100 percent for both residential and nonresidential land use types, as is representative of most development projects in the SFBAAB, unless project-specific data is available. Similarly, do not override the default natural gas usage values unless project-specific data is available.

Hearth Fuel Combustion
The *Hearth Fuel Combustion* category consists of separate tabs for *Hearth Percentages*, *Wood Stoves*, *Wood Fireplaces*, *Natural Gas Fireplaces*, and *Natural Gas Emission Factors*. Each of the tabs is discussed separately below.

- *Hearth Percentages*
  The parameters on the *Hearth Percentages* tab are applicable only to projects that include residential units. The default percentages should be used for the wood stoves, wood fireplaces, and wood stoves unless project-specific information is available. URBEMIS does not estimate emissions from any hearth types for nonresidential land use types.

- *Wood Stoves*
  On the *Wood Stoves* tab, the default percent values for the types of wood stoves (i.e., *Noncatalytic*, *Catalytic*, *Conventional*, and *Pellet*) should be changed in accordance with District Regulation 6, Rule 3, which allows only EPA-certified wood burning fireplaces and pellet stoves in new construction projects. The values for *Wood Burned*, *Wood Stove Usage*, and *Pounds in a Cord of Wood* should not be changed unless project-specific information is available.

- *Wood Fireplaces*
  The *Wood Fireplaces* tab is similar to the *Wood Stoves* tab. The emission factors on this tab cannot be modified. The values for *Wood Burned*, *Wood Stove Usage*, and *Pounds in a Cord of Wood* should not be changed unless project-specific information is available. District Regulation 6, Rule 3 allows only EPA-certified wood burning fireplaces in new construction projects.

- *Natural Gas Fireplaces*
  The values in the data fields on the *Natural Gas Fireplaces* tab should only be modified in the case that project-specific information is available that supports overriding default values.

- *Natural Gas Emission Factors*
  The emission factors contained in the *Natural Gas Emission Factors* tab cannot be modified. These values are used to estimate emissions from natural gas combustion in fireplaces/stoves and, according to the URBEMIS User's Guide, are based on U.S. Environmental Protection Agency Air Pollutant (AP-42) emission factors.

Landscape Fuel Combustion
The *Landscape Fuel Combustion* source category calculates on-site emissions from landscaping equipment such as lawn mowers, leaf blowers, chain saws, and hedge trimmers that are powered by internal combustion engines. On this tab, only adjust the value for the year being analyzed. The year entered into this field should be the earliest year when the project could become fully

operational. Landscaping emissions are estimated for the summer period only. URBEMIS uses emission rates from ARB's OFFROAD model to estimate of landscape maintenance equipment emissions.

Consumer Products
The *Consumer Products* source category is only relevant to projects that include residential land use types. The *Pounds of ROG (per person)* value should not be adjusted in this category. The persons per residential unit data field should be adjusted based on the estimated number of residents that would be supported by the proposed project, if available. The value should be consistent with the number of residents divided by the number of residential units.

Architectural Coating
Do not make changes to the values in the *Architectural Coating* source category without consulting BAAQMD.

EXAMPLE PROJECT OPERATIONAL-RELATED EMISSIONS CALCULATION

Description
The Example Project would develop a multi-story, mixed-use building that includes 40 units of residential condominium apartments, 50,000 square feet (or "50 thousand square feet" [ksf]) of offices and 35 ksf of retail land uses on an undeveloped 4.0-acre site. All of the residential condominium apartments would have natural gas lines for space heating but half of the units would be referred to as "suites" and include natural gas fireplaces. The regular apartments would not have natural gas fireplaces. Project construction would last two years beginning in 2010 and the project would be fully operational by 2013.

Screening Analysis
In the Land Use Module of URBEMIS (*Enter Land Use Data*) the corresponding Land Use Types of the proposed development would be Apartment High Rise units, General Office Building, and Strip Mall.

When each of the Land Use Types (i.e. Apartment High Rise units, General Office Building, and Strip Mall) is considered individually, their respective sizes would not exceed any of the District's Operational Screening Criteria (Table 3-1). However, because the project would contain more than one land use type, the operational screening levels cannot be used to assess the project's operational emissions, as explained in the discussion about the screening levels earlier in this guidance. The lead agency would be required to perform a detailed estimation of operational emissions using URBEMIS.

Emissions Quantification
When entering the proposed land uses into the Land Use Module, URBEMIS estimates the number of Acres for each Land Use Type assuming that each land use type would be constructed on separate lots. Using default values URBEMIS would assume this Example Project is 4.56 total acres (i.e. 0.65 acres for Apartment High Rise, 2.30 acres for General Office Building, and 1.61 acres for Strip Mall). For mixed-use and/or multi-level developments, the user should adjust the Acres for each of the proposed land uses such that the combined total acreage of all land use types is equal to the actual combined total size of the proposed project site (i.e., 4.0 acres, in this example) prior to running the model.

URBEMIS estimates the Trip Rate differently for residential land use types than for non-residential land use types. For residential land use types, URBEMIS adjusts the default Trip Rate based on residential density (i.e., dwelling units/residential acre). Therefore, overriding the default

value for the number of Acres assumed by URBEMIS for a residential land use type would automatically result in a change to the value assumed in the Trip Rate data field. If both the number of Acres and the Trip Rate for a residential development are known, the user should adjust the Acres field first, then adjust the Trip Rate field, and then click the Submit button. For nonresidential Land Use Types, URBEMIS uses a default value for in the Trip Rate data field that is directly based on the Unit Amt entered into the Land Use Module. The trip rates used by URBEMIS are based on standard rates from the ITE Trip Generation Manual. URBEMIS also assumes a Floor Area Ratio (FAR) of 0.5 for all nonresidential land use types. The FAR is the ratio of the total floor area of a building to the size of the parcel on which it is located. The user should override the value in the Acres data field based on the actual FAR for the development, as appropriate.

In the Area Source Module, Hearth Fuel Combustion category, the user should change the data fields for Wood Stoves, Wood Fireplaces, Natural Gas Fireplaces, and None (% w/o any hearth option) on the Hearth Percentages tab to 0, 0, 50, and 50, respectively to match the project description. In the Landscape Fuel Combustion source category the Year being Analyzed data field should be changed to 2013.

In the Operational Module the year data field in the Year & Vehicle Fleet category page should also be changed to 2013.

Lastly, the estimated daily and annual emissions of criteria air pollutants and precursors should be compared to the District's thresholds of significance (Table 2-2). If the daily or annual emissions would exceed the thresholds of significance, operational emissions would be considered significant and all feasible mitigation measures should be implemented to reduce these emissions.

CONSTRUCTION-RELATED EMISSIONS

Land Use Development Projects

URBEMIS includes a module (*Enter Construction Data*) that quantifies emissions from the following construction-related activity phases: demolition, mass and fine grading ("grading"), trenching, asphalt paving, building construction, and the application of architectural coatings.

URBEMIS Input Parameters

BAAQMD recommends input parameters and data requirements along with general URBEMIS user information for each construction-related activity phase below. Refer to the URBEMIS User's Manual for more detailed information. Appendix A contains a *Construction Data Needs Form* template that can be used to assist with requesting and gathering project-specific information.

Land Use Type and Size

Choose each individual land use type (e.g., single family housing, apartment high rise, regional shopping center, or office park) that is most applicable to the proposed development project in the *Enter Land Use Data* module and enter the size of the project (e.g., acres, thousand square feet [ksf], students, dwelling units [du], rooms, pumps, rooms, or employees). For several of the land use types, various size units are available (e.g., ksf and acres); ensure that the unit type for the project-specific data is consistent with the unit type selected in URBEMIS.

Schedule

The project schedule typically provides the number of months or days required for the completion of each construction-related activity phase (e.g., grading, building construction, asphalt paving), as well as the total duration of project construction. Where project-specific information is

available, modify URBEMIS default assumptions in *Click to Add, Delete, or Modify Phases* under the *Enter Construction Data* module. In this module, add or delete construction activities, add multiple similar construction activities (e.g., three grading phases), as well as overlap any construction activities as necessary. The URBEMIS default assumption for the number of work days per week is five, which inherently assumes that construction-related activities would only occur during weekdays, not on weekends. This can be altered if project-specific data is available in *Click to Add, Delete, or Modify Phases* under the construction phase setting *Work Days/Week.* For projects with specific phasing information (i.e., duration of each construction phase), but no definite construction commencement date, the earliest feasible start date should be used to be conservative. In addition, when project-specific information is not known, assume some overlap of construction phases (e.g., overlap of grading and asphalt paving activities or asphalt paving and building construction activities) to also be conservative. Please note that URBEMIS quantifies annual emissions on a calendar year basis (i.e., January to December) rather than the year-long period (running yearly average from the start date of construction) with the maximum amount of emissions.

Demolition

URBEMIS quantifies exhaust and fugitive PM dust emissions from demolition activities in the *Demolition Phase* within the *Enter Construction Data* module. Information to quantify emissions from this activity phase includes:

1. Duration of demolition (work days/week, phase start and end dates);
2. Total volume of building to be demolished (width, length, and height);
3. Maximum daily volume of building to be demolished (width, length, and height);
4. Haul truck capacity (cubic yards [yd^3]);
5. Haul truck trip length to disposal site (round trip miles); and
6. Off-road equipment requirements (number and type of equipment).

URBEMIS contains default assumptions for haul truck capacity (yd^3 per truck) and round trip distance (miles), if project-specific information is not available. URBEMIS also contains default assumptions for off-road equipment requirements. URBEMIS bases these on the size(s) of the proposed land use type(s) in the *Enter Land Use Data* module to estimate the off-road equipment requirements. In other words, URBEMIS assumes the size of the land use to be demolished is equal to the land use that would be developed. If the size(s) and/or type(s) of the land use(s) to be demolished are different from the land use(s) to be developed, create a separate URBEMIS run to quantify demolition emissions. Input the size and type of land use(s) for the different demolition building space versus the proposed building space in the *Enter Land Use Data* module for the separate URBEMIS run and only include the *Demolition* phase within the *Enter Construction Data* module.

Site Grading (Mass and Fine)

URBEMIS quantifies exhaust and fugitive PM dust emissions from grading activities in the *Site Grading* phase within the *Enter Construction Data* module. Information to quantify emissions from this activity phase includes, where applicable:

1. Duration of grading (work days/week, phase start and end dates);
2. Total acreage to be graded (acres);
3. Maximum daily acreage disturbed (acres per day);
4. Type and amount of cut/fill activities (yd^3 per day on- or off-site);
5. Description of soil hauling (amount of soil import/export [yd^3], haul truck capacity [yd^3 per truck], round trips per day, round trip distance [miles]); and

6. Off-road grading equipment requirements (number and type of equipment).

URBEMIS default assumptions for the total acreage to be graded and the maximum daily acreage disturbed are shown in the *Daily Acreage* tab within the *Site Grading* phase. Under the default settings, URBEMIS assumes that the maximum daily acreage disturbed is equivalent to 25 percent of the total acreage to be graded. Override this default assumption if more specific project information is available. The *Site Grading* phase consists of separate tabs for *Daily Acreage*, as mentioned above, *Fugitive Dust*, *Soil Hauling*, and *Site Grading Equipment*. Due to the differences in methodology and level of information required, each is discussed separately below.

Fugitive Dust

URBEMIS quantifies fugitive PM dust emissions in the *Site Grading* phase under the *Fugitive Dust* tab. URBEMIS provides four different levels of detail from which to select (i.e., default, low, medium, and high), described below.

Default: This method involves the use of the *Default Emission Rate* quantification methodology in the *Fugitive Dust* tab for which fugitive PM dust emissions are based on an emission rate (pound per disturbed acre per day [lb/acre-day]). This method should only be used when no project-specific information is known, or when no cut/fill activities would occur. BAAQMD recommends the selection of the worst-case emission rate (i.e., 38.2 lb/acre-day) for extensive site preparation activities (e.g., cut/fill) where the exact type and amount (e.g., yd^3 per day on- or off-site) are not known, and selection of the average emission rate (i.e., 10 lb/acre-day) otherwise. The average emission rate would be used for projects that involve typical site grading activities, but no cut/fill or earthmoving activities.

Low: The *Low Level of Detail* quantification method should be used when cut/fill activities would occur and the amount of on-site and off-site cut/fill is known. Input the type and amount of cut/fill activities (yd^3 per day on- or off-site). On-site cut/fill activities involve soil movement within the boundaries of the project site via scrapers or graders, while off-site cut/fill activities involve soil movement outside of the boundaries of the project site via haul trucks. Projects that require off-site cut/fill should also enter the appropriate amount of soil import/export in the *Soil Hauling* tab, as discussed in more detail below.

Medium: The *Medium Level of Detail* quantification method should be used when cut/fill activities would occur and the required number of activity hours per day for on-site scrapers and off-site haul trucks is known. Input the number of hours per day for on-site scraper and off-site haul trucks conducting cut/fill activities. Input the total number of scraper-hours and/or haul truck-hours that are anticipated to occur per day. For example, if two scrapers would operate for eight hours per day each and three haul trucks would operate for four hours per day each, enter 16 for the *Onsite Scraper* parameter (i.e., 2 scrapers × 8 hours) and 12 for the *Offsite Haul* parameter (i.e., 3 haul trucks × 4 hours). Similar to the *Low Level of Detail* quantification method, on-site cut/fill activities involve soil movement within the boundaries of the project site via scrapers or graders, while off-site cut/fill activities involve soil movement outside of the boundaries of the project site via haul trucks. Projects that require off-site cut/fill should also enter the appropriate amount of soil import/export in the *Soil Hauling* tab, as discussed in more detail below.

High: The *High Level of Detail* quantification method should be used when cut/fill activities would occur and details about soil haulage is known. Input data on the amount of on- and off-site haulage (ton-miles per day) based on the total volume of cut/fill (yd^3), duration of the cut/fill activities (work days), density of soil being moved (tons per yd^3), and the scraper or haul truck round-trip distance (miles). A *High Level Haulage Input* worksheet that can be used to assist with

determining the amount of on- and off-site haulage (ton-miles per day) required for this method is contained in Appendix A.

Soil Hauling
URBEMIS quantifies entrained PM road dust and exhaust emissions from soil hauling in the *Soil Hauling* tab within the *Site Grading* phase. Information requirements include the amount of soil import/export (yd^3), round trips per day, round trip distance (miles), and haul truck capacity (yd^3 per truck). For round trip distance and haul truck capacity, URBEMIS provides default assumptions of 20 yd^3 per truck and 20 miles, respectively. Override the default assumptions if the project specific values are known.

Grading Equipment
URBEMIS quantifies exhaust emissions from on-site heavy-duty equipment in the *Site Grading Equipment* tab within the *Site Grading* phase. Information requirements include the type of equipment and quantity or amount, along with horsepower, load factor, and hours of operation per work day. URBEMIS provides default assumptions for all of these, primarily based on the amount of maximum daily acreage disturbed shown in the *Daily Acreage* tab. If project-specific grading equipment is known, click on the *All Checks Off* button and input the number for each type of equipment to be used for the project. Note that although the *All Checks Off* button will allow users to override the URBEMIS default equipment assumptions in the *Amount Model Uses* column, make sure to delete the previous URBEMIS default equipment selections prior to entering the project-specific equipment information.

Asphalt Paving
URBEMIS quantifies off-gas and exhaust emissions from asphalt paving activities in the *Paving* tab within the *Enter Construction Data* module. Information to quantify emissions from this activity phase includes the duration of asphalt paving (work days/week, phase start and end dates), total acreage to be paved, and off-road equipment requirements. URBEMIS includes default assumptions for the amount of asphalt to be paved based on the size of the proposed land use type(s) in the *Enter Land Use Data* module. Account for the size of project features (e.g., parking structure, roadways, and large hardtop fields) that would require asphalt paving in excess of default assumptions (i.e., standard site access and parking spaces) within the *Total Acreage to be Paved with Asphalt* parameter.

Architectural Coating
URBEMIS quantifies off-gas emissions from the application of architectural coatings in the *Arch Coating* tab within the *Enter Construction Data* module. Information to quantify emissions from this phase include the duration of activities (i.e., work days/week, phase start and end dates). URBEMIS includes default parameters for the volatile organic compound content per liter of coating based on BAAQMD's Regulation 8, Rule 3: Architectural Coating.

Basic Construction Mitigation Measures
BAAQMD recommends that all proposed projects implement the *Basic Construction Mitigation Measures* regardless of the significance determination. The methodology for quantifying criteria air pollutant and precursor emission reductions from both fugitive PM dust and exhaust emissions by implementing the *Basic Construction Mitigation Measures* discussed below.

Fugitive Particulate Matter Dust Emissions
For quantification of fugitive PM dust-related *Basic Construction Mitigation Measures* in URBEMIS, BAAQMD first recommends selecting the *Mitigation* option in the *Enter Construction Data* module for the *Site Grading* phase. For *Site Grading Soil Disturbance Mitigation*, select (turn on) the soil stabilizing measure titled *Water exposed surfaces* along with the two times daily option without altering the default percent reduction. For *Unpaved Roads Mitigation*, select the

measure titled *Reduce speed on unpaved roads to less than 15 mph* without altering the default percent reduction. URBEMIS assumes that fugitive PM dust emissions from soil disturbance activities and travel on unpaved roads account for approximately 79 percent and 21 percent of total the fugitive PM dust emissions, respectively. URBEMIS will apply an approximate 53 percent reduction to total fugitive PM dust emissions as a result of implementation of the *Basic Construction Mitigation Measures* 1 through 5 in Table 8-2.

BAAQMD considers this as a surrogate for the implementation of the *Basic Construction Mitigation Measures* listed in Section 8.2. RoadMod assumes an inherent 50 percent reduction in fugitive PM dust emissions when water trucks are selected. BAAQMD recommends selecting water trucks to account for the implementation of the *Basic Construction Mitigation Measures*.

Exhaust Emissions

For quantification of the exhaust-related *Basic Construction Mitigation Measures* in URBEMIS, select the *Mitigation* option in the *Enter Construction Data* module for the *Site Grading*, *Building Construction,* and *Asphalt Paving* phases, as applicable to the proposed project. BAAQMD then recommends that for the *Off-Road Equipment Mitigation*, select (turn on) the measure titled *Use aqueous diesel fuel* and alter the default percent reduction for each to match those recommended by BAAQMD in Section 8.2. BAAQMD considers this as a surrogate for the implementation of the *Basic Construction Mitigation Measures* listed in Section 8.2.

RoadMod

RoadMod does not calculate emission reductions associated with the implementation of the exhaust-related *Basic Construction Mitigation Measures*. To quantify the exhaust-related emission reductions associated with the implementation of the *Basic Construction Mitigation Measures*, rely on the information and data contained in the *Data Entry* and *Emission Estimates* tabs in RoadMod. Reductions in exhaust emissions should be quantified separately for each phase (i.e., Grubbing/Land Clearing, Grading/Excavation, Drainage/Utilities/ Sub-Grade, and Paving). First isolate the exhaust emissions from off-road (e.g., heavy-duty) equipment for each phase. Table 8-4 below provides a cell reference for the *Data Entry* tab of RoadMod to assist with the identification and isolation of such emissions.

Once isolated, apply the specified percent reductions listed in Section 8.2 to each compound emission to determine the resultant amount of mitigated emissions from construction of the proposed project for each phase. A 5 percent reduction could be applied for NO_X, PM_{10}, and $PM_{2.5}$ to account for implementation of the appropriate *Basic Construction Mitigation Measures*.

Emission reductions should be estimated by multiplying the total emissions for each compound by the anticipated emission reduction applicable for that compound to estimate the mitigated amount of emissions reductions.

Linear Projects

For proposed projects that are linear in nature (e.g., road or levee construction, pipeline installation, transmission lines), BAAQMD recommends using the most current version of Sacramento Metropolitan Air Quality Management District's (SMAQMD) Road Construction Emissions Model (RoadMod) to quantify construction-related criteria air pollutants and precursors. Similar to URBEMIS, RoadMod quantifies fugitive PM dust, exhaust, and off-gas emissions from the following construction-related activity phases: grubbing/land clearing, grading/excavation, drainage/utilities/sub-grade, and paving. BAAQMD recommends using RoadMod in accordance with the user instructions and default assumptions unless project-specific information is available. The default assumptions are applicable to projects located within the SFBAAB. Also, URBEMIS inherently accounts for the on-site construction of roadways and the installation of project infrastructure. If the proposed project involves off-site improvements that

are linear in nature (e.g., roadway widening), use RoadMod in addition to URBEMIS to determine total emissions.

Table B-1
Roadway Construction Emissions Model
Cell Reference for Unmitigated Off-Road Equipment Emissions

Linear Construction Phase	NO_X	PM_{10}	$PM_{2.5}$
Grubbing/Land Clearing	G155	H155	I155
Grading/Excavation	G195	H195	I195
Drainage/Utilities/Sub-Grade	G235	H235	I235
Paving	G275	H275	I275

Notes: NO_X = oxides of nitrogen; $PM_{2.5}$ = fine particulate matter with an aerodynamic resistance diameter of 2.5 micrometers or less; PM_{10} = respirable particulate matter with an aerodynamic resistance diameter of 10 micrometers or less.
Cell references refer to the *Data Entry* tab from the SMAQMD Road Construction Emissions Model.
Source: SMAQMD 2009.

NO_X Emission Reduction
Emissions of NO_X (lb/day) × (1 – [NO_X percent reduction])

PM_{10} Emission Reduction
Emissions of PM_{10} (lb/day) × (1 – [PM_{10} percent reduction])

$PM_{2.5}$ Emission Reduction
Emissions of $PM_{2.5}$ (lb/day) × ([1 – [$PM_{2.5}$ percent reduction])

Users should use the *Emission Estimates* tab to calculate the total mitigated amount of emissions for each phase of construction. The total NO_X, PM_{10}, and $PM_{2.5}$ exhaust emissions for each phase are contained in cells E6 to E9, H6 to H9, and K6 to K9, respectively. To calculate the total amount of mitigated emissions, first subtract the unmitigated off-road equipment exhaust emissions (Please refer to Table 8-2) from the total exhaust emissions to calculate total emissions without inclusion of off-road equipment exhaust emissions. Then, add the mitigated off-road exhaust emissions (calculated with the method described above) to the remaining emissions to calculate the total emissions with mitigated off-road construction equipment exhaust emissions. For PM_{10} and $PM_{2.5}$, add the mitigated exhaust emissions with the mitigated fugitive PM dust emissions (calculated by RoadMod) to calculate the total amount of mitigated PM_{10} and $PM_{2.5}$ emissions.

Fugitive Particulate Matter Dust
BAAQMD recommends that for *Site Grading Soil Disturbance Mitigation* select (turn on) the soil stabilizing measure titled *Equipment loading/unloading*. To account for the implementation of the *Additional Construction Mitigation Measures* 1 through 8, alter the default percent reduction to 63 percent, which would result in a total reduction of 75 percent in fugitive PM dust emissions.

To quantify emission reductions associated with the implementation of the fugitive PM dust-related *Additional Construction Mitigation Measures* in RoadMod, rely on the *Emission Estimates* tab. RoadMod assumes a 50 percent reduction in fugitive PM dust emissions. Apply an additional 50 percent reduction to the fugitive PM dust emissions contained in the *Emission Estimates* tab of RoadMod to account for the implementation of the *Additional Construction Mitigation Measures* 1 through 8. The resulting total percent reduction from fugitive PM dust emissions would be 75

percent (i.e., 1 – (0.5 × 0.5)). The resultant amount of fugitive PM dust emissions should be added to the average daily mitigated exhaust PM emissions (methodology described below) to calculate the total amount of mitigated PM_{10} and $PM_{2.5}$ emissions.

Exhaust Emissions

BAAQMD recommends that for the *Off-Road Equipment Mitigation* select (turn on) the measure titled *Diesel particulate filter* and alter the default percent reduction for each to match those recommended by BAAQMD in Section 8.2. BAAQMD considers this as a surrogate for the implementation of the *Additional Construction Mitigation Measures*. BAAQMD recommends that, if implementing Measure 9, turn on the measure titled *Use aqueous diesel fuel* and alter the default percent reduction values to 20 percent for NO_X and 45 percent for PM_{10}, and $PM_{2.5}$.

For RoadMod, apply a 20 percent reduction for NO_X and a 45 percent reduction for PM_{10} and $PM_{2.5}$ to account for implementation of Measure 9 in the *Additional Construction Mitigation Measure* .To quantify the other exhaust-related emission reductions associated with the implementation of the *Additional Construction Mitigation Measures*, follow the same methodology described above for applying the reductions associated with the implementation of the *Basic Construction Mitigation Measures*.

Off-Gas Emissions

For quantification of off-gas-related *Additional Construction Mitigation Measures*, first select the *Mitigation* option in the *Enter Construction Data* module for the *Architectural Coating* phase. Then select (turn on) the measures applicable to the proposed project and alter the default percent reduction for each to match those recommended by BAAQMD in Section 8.2. BAAQMD considers this as a surrogate for the implementation of the *Additional Construction Mitigation Measures* listed in Section 8.2.

EXAMPLE PROJECT CONSTRUCTION-RELATED EMISSIONS CALCULATION

Description

This Example Project proposes development of 100 single-family residential units over a 2-year period. The project site would be approximately 33 acres (URBEMIS default assumption) and require an undetermined volume of fill materials to be imported to the site. In addition, the project would involve construction of a new access road to serve the development.

Screening Analysis

The project size is less than the construction screening level for single-family residential uses listed in Table 3-4. However, because the project includes the import of fill to the site, the construction screening levels cannot be used to address construction emissions. Therefore, a detailed quantitative analysis of construction-generated NO_X emissions should be performed using URBEMIS to estimate NO_X generated by construction of the residential units and using the RoadMod to estimate NO_X emissions from construction of the new access road.

Emissions Quantification

The size and type of land use proposed (i.e., single family housing) should be entered into the Land Use Module in URBEMIS. In this case, the project's total acres are equal to the default URBEMIS assumption; therefore, no override is necessary in the Acres data field. Modeling the construction emissions associated with single-family residential units in URBEMIS requires detailed information about the construction schedule (e.g., commencement date, types of construction activities required, and length of construction activities).

The fugitive PM dust emissions associated with fill activities should be estimated using the Fugitive Dust tab of the Mass Site Grading phase. For use of the Low Level of Detail quantification method, the volume of fill activities should be divided by the number of days that fill activities would occur. For example, if the project would require up to 20,000 yd^3 of fill materials to be imported over a minimum of 40 work days, the user should enter 500 (i.e., 20,000 yd^3 ÷ 40 days) into the Amount of Offsite Cut/Fill (cubic yards/day) data field. In addition, users should also input the total volume of fill materials to be imported into the Total Amount of Soil to Import (cubic yards) data field in the Soil Hauling tab. Off-road construction equipment for grading activities is estimated by URBEMIS based on the Maximum Daily Acreage Disturbed data field.

URBEMIS estimates the types and quantities of construction equipment in the Building Construction phase to develop the proposed project. For the Asphalt Paving phase, URBEMIS assumes the project requires asphalt paving for 25% of the total site. If more specific information can be provided, then user should turn off the Reset acreage with land use changes button in the Off Gas Emissions tab and override the Total Acreage to be Paved with Asphalt data field.

Due to the linear nature of the new access road to the project, daily mass emissions associated with its construction should be quantified using RoadMod. Users should obtain basic project information for the new access road and enter the information into the Data Entry tab of RoadMod. If project-specific information is not available RoadMod estimates the construction schedule for the road and the equipment used in each construction phase.

For analysis of the project's total average daily emissions, users should add emissions of each respective pollutant associated with development of the single-family residential units with the respective emissions associated with construction of the access road where construction activities are anticipated to overlap in the construction schedule. The average daily emissions of each pollutant that would occur throughout the entire construction period should be identified and compared with the District's threshold of significance. If the emissions would exceed the threshold of significance, construction emissions would be considered significant and all feasible mitigation measures to reduce emissions shall be implemented.

The user should keep in mind that the District's numeric thresholds for construction emissions apply to exhaust emissions only. The District recommends implementation of Basic Control Measures to reduce fugitive dust emissions for all projects, and Additional Control Measures to reduce fugitive dust emissions for significant projects.

C. SAMPLE AIR QUALITY SETTING

The Bay Area Air Quality Management District (BAAQMD) is the regional air quality agency for the San Francisco Bay Area Air Basin (SFBAAB), which comprises all of Alameda, Contra Costa, Marin, Napa, San Francisco, San Mateo, and Santa Clara counties, the southern portion of Sonoma, and the southwestern portion of Solano County. Air quality in this area is determined by such natural factors as topography, meteorology, and climate, in addition to the presence of existing air pollution sources and ambient conditions. These factors along with applicable regulations are discussed below.

C.1.1. Climate, Topography, Air Pollution Potential

The SFBAAB is characterized by complex terrain, consisting of coastal mountain ranges, inland valleys, and bays, which distort normal wind flow patterns. The Coast Range splits resulting in a western coast gap, Golden Gate, and an eastern coast gap, Carquinez Strait, which allow air to flow in and out of the SFBAAB and the Central Valley.

The climate is dominated by the strength and location of a semi-permanent, subtropical high-pressure cell. During the summer, the Pacific high pressure cell is centered over the northeastern Pacific Ocean resulting in stable meteorological conditions and a steady northwesterly wind flow. Upwelling of cold ocean water from below to the surface because of the northwesterly flow produces a band of cold water off the California coast. The cool and moisture-laden air approaching the coast from the Pacific Ocean is further cooled by the presence of the cold water band resulting in condensation and the presence of fog and stratus clouds along the Northern California coast.

In the winter, the Pacific high-pressure cell weakens and shifts southward resulting in wind flow offshore, the absence of upwelling, and the occurrence of storms. Weak inversions coupled with moderate winds result in a low air pollution potential.

High Pressure Cell

During the summer, the large-scale meteorological condition that dominates the West Coast is a semi-permanent high pressure cell centered over the northeastern Pacific Ocean. This high pressure cell keeps storms from affecting the California coast. Hence, the SFBAAB experiences little precipitation in the summer months. Winds tend to blow on shore out of the north/northwest.

The steady northwesterly flow induces upwelling of cold water from below. This upwelling produces a band of cold water off the California coast. When air approaches the California coast, already cool and moisture-laden from its long journey over the Pacific, it is further cooled as it crosses this bank of cold water. This cooling often produces condensation resulting in a high incidence of fog and stratus clouds along the Northern California coast in the summer.

Generally in the winter, the Pacific high weakens and shifts southward, winds tend to flow offshore, upwelling ceases and storms occur. During the winter rainy periods, inversions (layers of warmer air over colder air; see below) are weak or nonexistent, winds are usually moderate and air pollution potential is low. The Pacific high does periodically become dominant, bringing strong inversions, light winds and high pollution potential.

Topography

The topography of the SFBAAB is characterized by complex terrain, consisting of coastal mountain ranges, inland valleys and bays. This complex terrain, especially the higher elevations, distorts the normal wind flow patterns in the SFBAAB. The greatest distortion occur when low-level inversions are present and the air beneath the inversion flows independently of air above the inversion, a condition that is common in the summer time.

The only major break in California's Coast Range occurs in the SFBAAB. Here the Coast Range splits into western and eastern ranges. Between the two ranges lies San Francisco Bay. The gap in the western coast range is known as the Golden Gate, and the gap in the eastern coast range is the Carquinez Strait. These gaps allow air to pass into and out of the SFBAAB and the Central Valley.

Wind Patterns

During the summer, winds flowing from the northwest are drawn inland through the Golden Gate and over the lower portions of the San Francisco Peninsula. Immediately south of Mount Tamalpais, the northwesterly winds accelerate considerably and come more directly from the west as they stream through the Golden Gate. This channeling of wind through the Golden Gate produces a jet that sweeps eastward and splits off to the northwest toward Richmond and to the southwest toward San Jose when it meets the East Bay hills.

Wind speeds may be strong locally in areas where air is channeled through a narrow opening, such as the Carquinez Strait, the Golden Gate or the San Bruno gap. For example, the average wind speed at San Francisco International Airport in July is about 17 knots (from 3 p.m. to 4 p.m.), compared with only 7 knots at San Jose and less than 6 knots at the Farallon Islands.

The air flowing in from the coast to the Central Valley, called the sea breeze, begins developing at or near ground level along the coast in late morning or early afternoon. As the day progresses, the sea breeze layer deepens and increases in velocity while spreading inland. The depth of the sea breeze depends in large part upon the height and strength of the inversion. If the inversion is low and strong, and hence stable, the flow of the sea breeze will be inhibited and stagnant conditions are likely to result.

In the winter, the SFBAAB frequently experiences stormy conditions with moderate to strong winds, as well as periods of stagnation with very light winds. Winter stagnation episodes are characterized by nighttime drainage flows in coastal valleys. Drainage is a reversal of the usual daytime air-flow patterns; air moves from the Central Valley toward the coast and back down toward the Bay from the smaller valleys within the SFBAAB.

Temperature

Summertime temperatures in the SFBAAB are determined in large part by the effect of differential heating between land and water surfaces. Because land tends to heat up and cool off more quickly than water, a large-scale gradient (differential) in temperature is often created between the coast and the Central Valley, and small-scale local gradients are often produced along the shorelines of the ocean and bays. The temperature gradient near the ocean is also exaggerated, especially in summer, because of the upwelling of cold ocean bottom water along the coast. On summer afternoons the temperatures at the coast can be 35°F cooler than temperatures 15 to 20 miles inland. At night this contrast usually decreases to less than 10°.

In the winter, the relationship of minimum and maximum temperatures is reversed. During the daytime the temperature contrast between the coast and inland areas is small, whereas at night the variation in temperature is large.

Precipitation

The SFBAAB is characterized by moderately wet winters and dry summers. Winter rains account for about 75 percent of the average annual rainfall. The amount of annual precipitation can vary greatly from one part of the SFBAAB to another even within short distances. In general, total annual rainfall can reach 40 inches in the mountains, but it is often less than 16 inches in sheltered valleys.

During rainy periods, ventilation (rapid horizontal movement of air and injection of cleaner air) and vertical mixing are usually high, and thus pollution levels tend to be low. However, frequent dry periods do occur during the winter where mixing and ventilation are low and pollutant levels build up.

Air Pollution Potential

The potential for high pollutant concentrations developing at a given location depends upon the quantity of pollutants emitted into the atmosphere in the surrounding area or upwind, and the ability of the atmosphere to disperse the contaminated air. The topographic and climatological factors discussed above influence the atmospheric pollution potential of an area. Atmospheric pollution potential, as the term is used here, is independent of the location of emission sources and is instead a function of factors described below.

Wind Circulation

Low wind speed contributes to the buildup of air pollution because it allows more pollutants to be emitted into the air mass per unit of time. Light winds occur most frequently during periods of low sun (fall and winter, and early morning) and at night. These are also periods when air pollutant emissions from some sources are at their peak, namely, commute traffic (early morning) and wood burning appliances (nighttime). The problem can be compounded in valleys, when weak flows carry the pollutants upvalley during the day, and cold air drainage flows move the air mass downvalley at night. Such restricted movement of trapped air provides little opportunity for ventilation and leads to buildup of pollutants to potentially unhealthful levels.

Wind-roses provide useful information for communities that contain industry, landfills or other potentially odorous or noxious land uses. Each wind-rose diagram provides a general indication of the proportion of time that winds blow from each compass direction. The longer the vector length, the greater the frequency of wind occurring from that direction. Such information may be particularly useful in planning buffer zones. For example, sensitive receptors such as residential developments, schools or hospitals are inappropriate uses immediately downwind from facilities that emit toxic or odorous pollutants, unless adequate separation is provided by a buffer zone. Caution should be taken in using wind-roses in planning and environmental review processes. A site on the opposite side of a hill or tall building, even a short distance from a meteorological monitoring station, may experience a significant difference in wind pattern. Consult BAAQMD meteorologists if more detailed wind circulation information is needed.

Inversions

An inversion is a layer of warmer air over a layer of cooler air. Inversions affect air quality conditions significantly because they influence the mixing depth, i.e., the vertical depth in the atmosphere available for diluting air contaminants near the ground. The highest air pollutant concentrations in the SFBAAB generally occur during inversions.

There are two types of inversions that occur regularly in the SFBAAB. One is more common in the summer and fall, while the other is most common during the winter. The frequent occurrence of elevated temperature inversions in summer and fall months acts to cap the mixing depth, limiting the depth of air available for dilution. Elevated inversions are caused by subsiding air from the subtropical high pressure zone, and from the cool marine air layer that is drawn into the SFBAAB by the heated low pressure region in the Central Valley.

The inversions typical of winter, called radiation inversions, are formed as heat quickly radiates from the earth's surface after sunset, causing the air in contact with it to rapidly cool. Radiation inversions are strongest on clear, low-wind, cold winter nights, allowing the build-up of such pollutants as carbon monoxide and particulate matter. When wind speeds are low, there is little mechanical turbulence to mix the air, resulting in a layer of warm air over a layer of cooler air next

to the ground. Mixing depths under these conditions can be as shallow as 50 to 100 meters, particularly in rural areas. Urban areas usually have deeper minimum mixing layers because of heat island effects and increased surface roughness. During radiation inversions downwind transport is slow, the mixing depths are shallow, and turbulence is minimal, all factors which contribute to ozone formation.

Although each type of inversion is most common during a specific season, either inversion mechanism can occur at any time of the year. Sometimes both occur simultaneously. Moreover, the characteristics of an inversion often change throughout the course of a day. The terrain of the SFBAAB also induces significant variations among subregions.

Solar Radiation

The frequency of hot, sunny days during the summer months in the SFBAAB is another important factor that affects air pollution potential. It is at the higher temperatures that ozone is formed. In the presence of ultraviolet sunlight and warm temperatures, reactive organic gases and oxides of nitrogen react to form secondary photochemical pollutants, including ozone.

Because temperatures in many of the SFBAAB inland valleys are so much higher than near the coast, the inland areas are especially prone to photochemical air pollution.

In late fall and winter, solar angles are low, resulting in insufficient ultraviolet light and warming of the atmosphere to drive the photochemical reactions. Ozone concentrations do not reach significant levels in the SFBAAB during these seasons.

Sheltered Terrain

The hills and mountains in the SFBAAB contribute to the high pollution potential of some areas. During the day, or at night during windy conditions, areas in the lee sides of mountains are sheltered from the prevailing winds, thereby reducing turbulence and downwind transport. At night, when wind speeds are low, the upper atmospheric layers are often decoupled from the surface layers during radiation conditions. If elevated terrain is present, it will tend to block pollutant transport in that direction. Elevated terrain also can create a recirculation pattern by inducing upvalley air flows during the day and reverse downvalley flows during the night, allowing little inflow of fresh air.

The areas having the highest air pollution potential tend to be those that experience the highest temperatures in the summer and the lowest temperatures in the winter. The coastal areas are exposed to the prevailing marine air , creating cooler temperatures in the summer, warmer temperatures in winter, and stratus clouds all year. The inland valleys are sheltered from the marine air and experience hotter summers and colder winters. Thus, the topography of the inland valleys creates conditions conducive to high air pollution potential.

Pollution Potential Related to Emissions

Although air pollution potential is strongly influenced by climate and topography, the air pollution that occurs in a location also depends upon the amount of air pollutant emissions in the surrounding area or transported from more distant places. Air pollutant emissions generally are highest in areas that have high population densities, high motor vehicle use and/or industrialization. These contaminants created by photochemical processes in the atmosphere, such as ozone, may result in high concentrations many miles downwind from the sources of their precursor chemicals.

Climatological Subregions

This section discusses the varying climatological and topographic conditions, and the resulting variations in air pollution potential, within inhabited subregions of the SFBAAB. All urbanized areas of the SFBAAB are included in one of 11 climatological subregions. Sparsely inhabited

areas are excluded from the subregional designations. Some of the climatological subregions discussed in this appendix overlap county boundaries. The Lead Agencies analyzing projects located close to the boundary between subregions may need to examine the characteristics of the neighboring subregions to adequately evaluate potential air quality impacts.

The information about each subregion includes location, topography and climatological factors relevant to air quality. Where relevant to air quality concerns, more localized subareas within a subregion are discussed. Each subregional section concludes with a discussion of pollution potential resulting from climatological and topographic variables and the major types of air pollutant sources in the subregion.

Carquinez Strait Region

The Carquinez Strait runs from Rodeo to Martinez. It is the only sea-level gap between the Bay and the Central Valley. The subregion includes the lowlands bordering the strait to the north and south, and includes the area adjoining Suisun Bay and the western part of the Sacramento-San Joaquin Delta as far east as Bethel Island. The subregion extends from Rodeo in the southwest and Vallejo in the northwest to Fairfield on the northeast and Brentwood on the southeast.

Prevailing winds are from the west in the Carquinez Strait. During the summer and fall months, high pressure offshore coupled with low pressure in the Central Valley causes marine air to flow eastward through the Carquinez Strait. The wind is strongest in the afternoon. Afternoon wind speeds of 15 to 20 mph are common throughout the strait region. Annual average wind speeds are 8 mph in Martinez, and 9 to 10 mph further east. Sometimes atmospheric conditions cause air to flow from the east. East winds usually contain more pollutants than the cleaner marine air from the west. In the summer and fall months, this can cause elevated pollutant levels to move into the central SFBAAB through the strait. These high pressure periods are usually accompanied by low wind speeds, shallow mixing depths, higher temperatures and little or no rainfall.

Summer mean maximum temperatures reach about 90° F. in the subregion. Mean minimum temperatures in the winter are in the high 30's. Temperature extremes are especially pronounced in sheltered areas farther from the moderating effects of the strait itself, e.g. at Fairfield.

Many industrial facilities with significant air pollutant emissions — e.g., chemical plants and refineries — are located within the Carquinez Strait Region. The pollution potential of this area is often moderated by high wind speeds. However, upsets at industrial facilities can lead to short-term pollution episodes, and emissions of unpleasant odors may occur at anytime. Receptors downwind of these facilities could suffer more long-term exposure to air contaminants than individuals elsewhere., It is important that local governments and other Lead Agencies maintain buffers zones around sources of air pollution sufficient to avoid adverse health and nuisance impacts on nearby receptors. Areas of the subregion that are traversed by major roadways, e.g. Interstate 80, may also be subject to higher local concentrations of carbon monoxide and particulate matter, as well as certain toxic air contaminants such as benzene.

Cotati and Petaluma Valleys

The subregion that stretches from Santa Rosa to the San Pablo Bay is often considered as two different valleys: the Cotati Valley in the north and the Petaluma Valley in the south. To the east, the valley is bordered by the Sonoma Mountains, while to the west is a series of low hills, followed by the Estero Lowlands, which open to the Pacific Ocean. The region from the Estero Lowlands to the San Pablo Bay is known as the Petaluma Gap. This low-terrain area allows marine air to travel into the SFBAAB.

Wind patterns in the Petaluma and Cotati Valleys are strongly influenced by the Petaluma Gap, with winds flowing predominantly from the west. As marine air travels through the Petaluma Gap, it splits into northward and southward paths moving into the Cotati and Petaluma valleys. The

southward path crosses San Pablo Bay and moves eastward through the Carquinez Strait. The northward path contributes to Santa Rosa's prevailing winds from the south and southeast. Petaluma's prevailing winds are from the northwest.

When the ocean breeze is weak, strong winds from the east can predominate, carrying pollutants from the Central Valley and the Carquinez Strait. During these periods, upvalley flows can carry the polluted air as far north as Santa Rosa.

Winds are usually stronger in the Petaluma Valley than the Cotati Valley because the former is directly in line with the Petaluma Gap. Petaluma's climate is similar to areas closer to the coast even though Petaluma is 28 miles from the ocean. Average annual wind speed at the Petaluma Airport is seven mph. The Cotati Valley, being slightly north of the Petaluma Gap, experiences lower wind speeds. The annual average wind speed in Santa Rosa is five mph.

Air temperatures are very similar in the two valleys. Summer maximum temperatures for this subregion are in the low-to-mid-80's, while winter maximum temperatures are in the high-50's to low-60's. Summer minimum temperatures are around 50 degrees, and winter minimum temperatures are in the high 30's.

Generally, air pollution potential is low in the Petaluma Valley because of its link to the Petaluma Gap and because of its low population density. There are two scenarios that could produce elevated pollutant levels: 1) stagnant conditions in the morning hours created when a weak ocean breeze meets a weak bay breeze, and 2) an eastern or southeastern wind pattern in the afternoon brings in pollution from the Carquinez Strait Region and the Central Valley.

The Cotati Valley has a higher pollution potential than does the Petaluma Valley. The Cotati Valley lacks a gap to the sea, contains a larger population and has natural barriers at its northern and eastern ends. There are also industrial facilities in and around Santa Rosa. Both valleys of this subregion are also threatened by increased motor vehicle traffic and the associated air contaminants. Population and motor vehicle use are increasing significantly, and housing costs and the suburbanization of employment are leading to more and longer commutes traversing the subregion.

Diablo and San Ramon Valleys

East of the Coast Range lay the Diablo and San Ramon Valleys. The valleys have a northwest to southeast orientation, with the northern portion known as Diablo Valley and the southern portion as San Ramon Valley. The Diablo Valley is bordered in the north by the Carquinez Strait and in the south by the San Ramon Valley. The San Ramon Valley is long and narrow and extends south from Walnut Creek to Dublin. At its southern end it opens onto the Amador Valley.

The mountains on the west side of these valleys block much of the marine air from reaching the valleys. During the daytime, there are two predominant flow patterns: an upvalley flow from the north and a westerly flow (wind from the west) across the lower elevations of the Coast Range. On clear nights, surface inversions separate the flow of air into two layers: the surface flow and the upper layer flow. When this happens, there are often drainage surface winds which flow downvalley toward the Carquinez Strait.

Wind speeds in these valleys generally are low. Monitoring stations in Concord and Danville report annual average wind speeds of 5 mph. Winds can increase in the afternoon near San Ramon because it is located at the eastern edge of the Crow Canyon gap. Through this gap, polluted air from cities near the Bay travels to the valley in the summer months.

Air temperatures in these valleys are cooler in the winter and warmer in the summer than are temperatures further west, as these valleys are far from the moderating effect of the Bay and

ocean. Mean summer maximum temperatures are in the low- to mid-80's. Mean winter minimum temperatures are in the high-30's to low-40's.

Pollution potential is relatively high in these valleys. On winter evenings, light winds combined with surface-based inversions and terrain that restricts air flow can cause pollutant levels to build up. San Ramon Valley can experience high pollution concentrations due to motor vehicle emissions and emissions from fireplaces and wood stoves. In the summer months, ozone and ozone precursors are often transported into the valleys from both the central SFBAAB and the Central Valley.

Livermore Valley

The Livermore Valley is a sheltered inland valley near the eastern border of SFBAAB. The western side of the valley is bordered by 1,000 to 1,500 foot hills with two gaps connecting the valley to the central SFBAAB, the Hayward Pass and Niles Canyon. The eastern side of the valley also is bordered by 1,000 to 1,500 foot hills with one major passage to the San Joaquin Valley called the Altamont Pass and several secondary passages. To the north lie the Black Hills and Mount Diablo. A northwest to southeast channel connects the Diablo Valley to the Livermore Valley. The south side of the Livermore Valley is bordered by mountains approximately 3,000 to 3,500 feet high.

During the summer months, when there is a strong inversion with a low ceiling, air movement is weak and pollutants become trapped and concentrated. Maximum summer temperatures in the Livermore Valley range from the high-80's to the low-90's, with extremes in the 100's. At other times in the summer, a strong Pacific high pressure cell from the west, coupled with hot inland temperatures causes a strong onshore pressure gradient which produces a strong, afternoon wind. With a weak temperature inversion, air moves over the hills with ease, dispersing pollutants.

In the winter, with the exception of an occasional storm moving through the area, air movement is often dictated by local conditions. At night and early morning, especially under clear, calm and cold conditions, gravity drives cold air downward. The cold air drains off the hills and moves into the gaps and passes. On the eastern side of the valley the prevailing winds blow from north, northeast and east out of the Altamont Pass. Winds are light during the late night and early morning hours. Winter daytime winds sometimes flow from the south through the Altamont Pass to the San Joaquin Valley. Average winter maximum temperatures range from the high-50's to the low-60's, while minimum temperatures are from the mid-to-high-30's, with extremes in the high teens and low-20's.

Air pollution potential is high in the Livermore Valley, especially for photochemical pollutants in the summer and fall. High temperatures increase the potential for ozone to build up. The valley not only traps locally generated pollutants but can be the receptor of ozone and ozone precursors from San Francisco, Alameda, Contra Costa and Santa Clara counties. On northeasterly wind flow days, most common in the early fall, ozone may be carried west from the San Joaquin Valley to the Livermore Valley.

During the winter, the sheltering effect of the valley, its distance from moderating water bodies, and the presence of a strong high pressure system contribute to the development of strong, surface-based temperature inversions. Pollutants such as carbon monoxide and particulate matter, generated by motor vehicles, fireplaces and agricultural burning, can become concentrated. Air pollution problems could intensify because of population growth and increased commuting to and through the subregion.

Marin County Basins

Marin County is bounded on the west by the Pacific Ocean, on the east by San Pablo Bay, on the south by the Golden Gate and on the north by the Petaluma Gap. Most of Marin's population lives in the eastern part of the county, in small, sheltered valleys. These valleys act like a series of miniature air basins.

Although there are a few mountains above 1500 feet, most of the terrain is only 800 to 1000 feet high, which usually is not high enough to block the marine layer. Because of the wedge shape of the county, northeast Marin County is further from the ocean than is the southeastern section. This extra distance from the ocean allows the marine air to be moderated by bayside conditions as it travels to northeastern Marin County. In southern Marin the distance from the ocean is short and elevations are lower, resulting in higher incidence of maritime air in that area.

Wind speeds are highest along the west coast of Marin, averaging about 8 to 10 miles per hour. The complex terrain in central Marin creates sufficient friction to slow the air flow. At Hamilton Air Force Base, in Novato, the annual average wind speeds are only 5 mph. The prevailing wind directions throughout Marin County are generally from the northwest.

In the summer months, areas along the coast are usually subject to onshore movement of cool marine air. In the winter, proximity to the ocean keeps the coastal regions relatively warm, with temperatures varying little throughout the year. Coastal temperatures are usually in the high-50's in the winter and the low-60's in the summer. The warmest months are September and October.

The eastern side of Marin County has warmer weather than the western side because of its distance from the ocean and because the hills that separate eastern Marin from western Marin occasionally block the flow of the marine air. The temperatures of cities next to the Bay are moderated by the cooling effect of the Bay in the summer and the warming effect of the Bay in the winter. For example, San Rafael experiences average maximum summer temperatures in the low-80's and average minimum winter temperatures in the low-40’s. Inland towns such as Kentfield experience average maximum temperatures that are two degrees cooler in the winter and two degrees warmer in the summer.

Air pollution potential is highest in eastern Marin County, where most of population is located in semi-sheltered valleys. In the southeast, the influence of marine air keeps pollution levels low. As development moves further north, there is greater potential for air pollution to build up because the valleys are more sheltered from the sea breeze. While Marin County does not have many polluting industries, the air quality on its eastern side — especially along the U.S. 101 corridor — may be affected by emissions from increasing motor vehicle use within and through the county.

Napa Valley

The Napa Valley is bordered by relatively high mountains. With an average ridge line height of about 2000 feet, with some peaks approaching 3000 to 4000 feet, these mountains are effective barriers to the prevailing northwesterly winds. The Napa Valley is widest at its southern end and narrows in the north.

During the day, the prevailing winds flow upvalley from the south about half of the time. A strong upvalley wind frequently develops during warm summer afternoons, drawing air in from the San Pablo Bay. Daytime winds sometimes flow downvalley from the north. During the evening, especially in the winter, downvalley drainage often occurs. Wind speeds are generally low, with almost 50 percent of the winds less than 4 mph. Only 5 percent of the winds are between 16 and 18 mph, representing strong summertime upvalley winds and winter storms.

Summer average maximum temperatures are in the low 80's at the southern end of the valley and in the low 90's at the northern end. Winter average maximum temperatures are in the high-

50's and low-60's, and minimum temperatures are in the high to mid 30's with the slightly cooler temperatures in the northern end.

The air pollution potential in the Napa Valley could be high if there were sufficient sources of air contaminants nearby. Summer and fall prevailing winds can transport ozone precursors northward from the Carquinez Strait Region to the Napa Valley, effectively trapping and concentrating the pollutants when stable conditions are present. The local upslope and downslope flows created by the surrounding mountains may also recirculate pollutants already present, contributing to buildup of air pollution. High ozone concentrations are a potential problem to sensitive crops such as wine grapes, as well as to human health. The high frequency of light winds and stable conditions during the late fall and winter contribute to the buildup of particulate matter from motor vehicles, agriculture and wood burning in fireplaces and stoves.

Northern Alameda and Western Contra Costa Counties

This climatological subregion stretches from Richmond to San Leandro. Its western boundary is defined by the Bay and its eastern boundary by the Oakland-Berkeley Hills. The Oakland-Berkeley Hills have a ridge line height of approximately 1500 feet, a significant barrier to air flow. The most densely populated area of the subregion lies in a strip of land between the Bay and the lower hills.

In this area, marine air traveling through the Golden Gate, as well as across San Francisco and through the San Bruno Gap, is a dominant weather factor. The Oakland-Berkeley Hills cause the westerly flow of air to split off to the north and south of Oakland, which causes diminished wind speeds. The prevailing winds for most of this subregion are from the west. At the northern end, near Richmond, prevailing winds are from the south-southwest.

Temperatures in this subregion have a narrow range due to the proximity of the moderating marine air. Maximum temperatures during summer average in the mid-70's, with minimums in the mid-50's. Winter highs are in the mid- to high-50's, with lows in the low- to mid-40's.

The air pollution potential is lowest for the parts of the subregion that are closest to the bay, due largely to good ventilation and less influx of pollutants from upwind sources. The occurrence of light winds in the evenings and early mornings occasionally causes elevated pollutant levels.

The air pollution potential at the northern (Richmond) and southern (Oakland, San Leandro) parts of this subregion is marginally higher than communities directly east of the Golden Gate, because of the lower frequency of strong winds.

This subregion contains a variety of industrial air pollution sources. Some industries are quite close to residential areas. The subregion is also traversed by frequently congested major freeways. Traffic and congestion, and the motor vehicle emissions they generate, are increasing.

Peninsula

The peninsula region extends from northwest of San Jose to the Golden Gate. The Santa Cruz Mountains run up the center of the peninsula, with elevations exceeding 2000 feet at the southern end, decreasing to 500 feet in South San Francisco. Coastal towns experience a high incidence of cool, foggy weather in the summer. Cities in the southeastern peninsula experience warmer temperatures and fewer foggy days because the marine layer is blocked by the ridgeline to the west. San Francisco lies at the northern end of the peninsula. Because most of San Francisco's topography is below 200 feet, marine air is able to flow easily across most of the city, making its climate cool and windy.

The blocking effect of the Santa Cruz Mountains results in variations in summertime maximum temperatures in different parts of the peninsula. For example, in coastal areas and San Francisco

the mean maximum summer temperatures are in the mid-60's, while in Redwood City the mean maximum summer temperatures are in the low-80's. Mean minimum temperatures during the winter months are in the high-30's to low-40's on the eastern side of the Peninsula and in the low 40's on the coast.

Two important gaps in the Santa Cruz Mountains occur on the peninsula. The larger of the two is the San Bruno Gap, extending from Fort Funston on the ocean to the San Francisco Airport. Because the gap is oriented in the same northwest to southeast direction as the prevailing winds, and because the elevations along the gap are less than 200 feet, marine air is easily able to penetrate into the bay. The other gap is the Crystal Springs Gap, between Half Moon Bay and San Carlos. As the sea breeze strengthens on summer afternoons, the gap permits maritime air to pass across the mountains, and its cooling effect is commonly seen from San Mateo to Redwood City.

Annual average wind speeds range from 5 to 10 mph throughout the peninsula, with higher wind speeds usually found along the coast. Winds on the eastern side of the peninsula are often high in certain areas, such as near the San Bruno Gap and the Crystal Springs Gap.

The prevailing winds along the peninsula's coast are from the west, although individual sites can show significant differences. For example, Fort Funston in western San Francisco shows a southwest wind pattern while Pillar Point in San Mateo County shows a northwest wind pattern. On the east side of the mountains winds are generally from the west, although wind patterns in this area are often influenced greatly by local topographic features.

Air pollution potential is highest along the southeastern portion of the peninsula. This is the area most protected from the high winds and fog of the marine layer. Pollutant transport from upwind sites is common. In the southeastern portion of the peninsula, air pollutant emissions are relatively high due to motor vehicle traffic as well as stationary sources. At the northern end of the peninsula in San Francisco, pollutant emissions are high, especially from motor vehicle congestion. Localized pollutants, such as carbon monoxide, can build up in "urban canyons." Winds are generally fast enough to carry the pollutants away before they can accumulate.

Santa Clara Valley

The Santa Clara Valley is bounded by the Bay to the north and by mountains to the east, south and west. Temperatures are warm on summer days and cool on summer nights, and winter temperatures are fairly mild. At the northern end of the valley, mean maximum temperatures are in the low-80's during the summer and the high-50's during the winter, and mean minimum temperatures range from the high-50's in the summer to the low-40's in the winter. Further inland, where the moderating effect of the Bay is not as strong, temperature extremes are greater. For example, in San Martin, located 27 miles south of the San Jose Airport, temperatures can be more than 10 degrees warmer on summer afternoons and more than 10 degrees cooler on winter nights.

Winds in the valley are greatly influenced by the terrain, resulting in a prevailing flow that roughly parallels the valley's northwest-southeast axis. A north-northwesterly sea breeze flows through the valley during the afternoon and early evening, and a light south-southeasterly drainage flow occurs during the late evening and early morning. In the summer the southern end of the valley sometimes becomes a "convergence zone," when air flowing from the Monterey Bay gets channeled northward into the southern end of the valley and meets with the prevailing north-northwesterly winds.

Wind speeds are greatest in the spring and summer and weakest in the fall and winter. Nighttime and early morning hours frequently have calm winds in all seasons, while summer afternoons and

evenings are quite breezy. Strong winds are rare, associated mostly with the occasional winter storm.

The air pollution potential of the Santa Clara Valley is high. High summer temperatures, stable air and mountains surrounding the valley combine to promote ozone formation. In addition to the many local sources of pollution, ozone precursors from San Francisco, San Mateo and Alameda Counties are carried by prevailing winds to the Santa Clara Valley. The valley tends to channel pollutants to the southeast. In addition, on summer days with low level inversions, ozone can be recirculated by southerly drainage flows in the late evening and early morning and by the prevailing northwesterlies in the afternoon. A similar recirculation pattern occurs in the winter, affecting levels of carbon monoxide and particulate matter. This movement of the air up and down the valley increases the impact of the pollutants significantly.

Pollution sources are plentiful and complex in this subregion. The Santa Clara Valley has a high concentration of industry at the northern end, in the Silicon Valley. Some of these industries are sources of air toxics as well as criteria air pollutants. In addition, Santa Clara Valley's large population and many work-site destinations generate the highest mobile source emissions of any subregion in the SFBAAB.

Sonoma Valley

The Sonoma Valley is west of the Napa Valley. It is separated from the Napa Valley and from the Cotati and Petaluma Valleys by mountains. The Sonoma Valley is long and narrow, approximately 5 miles wide at its southern end and less than a mile wide at the northern end.

The climate is similar to that of the Napa Valley, with the same basic wind characteristics. The strongest upvalley winds occur in the afternoon during the summer and the strongest downvalley winds occur during clear, calm winter nights. Prevailing winds follow the axis of the valley, northwest/southeast, while some upslope flow during the day and downslope flow during the night occurs near the base of the mountains. Summer average maximum temperatures are usually in the high-80's, and summer minimums are around 50 degrees. Winter maximums are in the high-50's to the mid-60's, with minimums ranging from the mid-30's to low-40's.

As in the Napa Valley, the air pollution potential of the Sonoma Valley could be high if there were significant sources of pollution nearby. Prevailing winds can transport local and nonlocally generated pollutants northward into the narrow valley, which often traps and concentrates the pollutants under stable conditions. The local upslope and downslope flows set up by the surrounding mountains may also recirculate pollutants.

However, local sources of air pollution are minor. With the exception of some processing of agricultural goods, such as wine and cheese manufacturing, there is little industry in this valley. Increases in motor vehicle emissions and woodsmoke emissions from stoves and fireplaces may increase pollution as the valley grows in population and as a tourist attraction.

Southwestern Alameda County

This subregion encompasses the southeast side of San Francisco Bay, from Dublin Canyon to north of Milpitas. The subregion is bordered on the east by the East Bay hills and on the west by the bay. Most of the area is flat.

This subregion is indirectly affected by marine air flow. Marine air entering through the Golden Gate is blocked by the East Bay hills, forcing the air to diverge into northerly and southerly paths. The southern flow is directed down the bay, parallel to the hills, where it eventually passes over southwestern Alameda County. These sea breezes are strongest in the afternoon. The further from the ocean the marine air travels, the more the ocean’s effect is diminished. Although the

climate in this region is affected by sea breezes, it is affected less so than the regions closer to the Golden Gate.

The climate of southwestern Alameda County is also affected by its close proximity to San Francisco Bay. The Bay cools the air with which it comes in contact during warm weather, while during cold weather the Bay warms the air. The normal northwest wind pattern carries this air onshore. Bay breezes push cool air onshore during the daytime and draw air from the land offshore at night.

Winds are predominantly out of the northwest during the summer months. In the winter, winds are equally likely to be from the east. Easterly-southeasterly surface flow into southern Alameda County passes through three major gaps: Hayward/Dublin Canyon, Niles Canyon and Mission Pass. Areas north of the gaps experience winds from the southeast, while areas south of the gaps experience winds from the northeast. Wind speeds are moderate in this subregion, with annual average wind speeds close to the Bay at about 7 mph, while further inland they average 6 mph.

Air temperatures are moderated by the subregion's proximity to the Bay and to the sea breeze. Temperatures are slightly cooler in the winter and slightly warmer in the summer than East Bay cities to the north. During the summer months, average maximum temperatures are in the mid-70's. Average maximum winter temperatures are in the high-50's to low-60's. Average minimum temperatures are in the low 40's in winter and mid-50's in the summer.

Pollution potential is relatively high in this subregion during the summer and fall. When high pressure dominates, low mixing depths and Bay and ocean wind patterns can concentrate and carry pollutants from other cities to this area, adding to the locally emitted pollutant mix. The polluted air is then pushed up against the East Bay hills. In the wintertime, the air pollution potential in southwestern Alameda County is moderate. Air pollution sources include light and heavy industry, and motor vehicles. Increasing motor vehicle traffic and congestion in the subregion may increase Southwest Alameda County pollution as well as that of its neighboring subregions.

C.1.2. Existing Ambient Air Quality: Criteria Air Pollutants

The California Air Resources Board (ARB) and the U.S. Environmental Protection Agency (EPA) currently focus on the following air pollutants as indicators of ambient air quality: ozone, particulate matter (PM), nitrogen dioxide (NO_2), CO, sulfur dioxide (SO_2), and lead. Because these are the most prevalent air pollutants known to be deleterious to human health and extensive health-effects criteria documents are available, they are commonly referred to as "criteria air pollutants." Sources and health effects of the criteria air pollutants are summarized in Table C.2. Current state and federal air quality standards are available at http://www.arb.ca.gov/research/aaqs/aaqs2.pdf and designations are available at http://www.arb.ca.gov/desig/desig.htm. See Table C.1 for current attainment status.

Table C.1
Ambient Air Quality Standards and Designations

Pollutant	Averaging Time	California		National Standards[a]		
		Standards[b, c]	Attainment Status[d]	Primary[c,e]	Secondary[c,f]	Attainment Status[g]
Ozone	1-hour	0.09 ppm (180 µg/m^3)	N (Serious)	–[h]	Same as Primary Standard	–[h]
	8-hour	0.070 ppm (137 µg/m^3)	–	0.075 ppm (147 µg/m^3)		N
Carbon Monoxide (CO)	1-hour	20 ppm (23 mg/m^3)	A	35 ppm (40 mg/m^3)	–	U/A
	8-hour	9 ppm (10 mg/m^3)		9 ppm (10 mg/m^3)		
Nitrogen Dioxide (NO_2)	Annual Arithmetic Mean	0.030 ppm (57 µg/m^3)	–	0.053 ppm (100 µg/m^3)	Same as Primary Standard	U/A
	1-hour	0.18 ppm (339 µg/m^3)	A	–		–
Sulfur Dioxide (SO_2)	Annual Arithmetic Mean	–	–	0.030 ppm (80 µg/m^3)	–	A
	24-hour	0.04 ppm (105 µg/m^3)	A	0.14 ppm (365 µg/m^3)	–	
	3-hour	–	–	–	0.5 ppm (1300 µg/m^3)	
	1-hour	0.25 ppm (655 µg/m^3)	A	–	–	–
Respirable Particulate Matter (PM_{10})	Annual Arithmetic Mean	20 µg/m^3	N	–[h]	Same as Primary Standard	U
	24-hour	50 µg/m^3		150 µg/m^3		
Fine Particulate Matter ($PM_{2.5}$)	Annual Arithmetic Mean	12 µg/m^3	N	15 µg/m^3	Same as Primary Standard	N[j]
	24-hour	–	–	35 µg/m^3		
Lead[i]	30-day Average	1.5 µg/m^3	A	–	–	–
	Calendar Quarter	–	–	1.5 µg/m^3	Same as Primary Standard	–

Table C.1
Ambient Air Quality Standards and Designations

Pollutant	Averaging Time	California		National Standards[a]		
		Standards[b, c]	Attainment Status[d]	Primary[c,e]	Secondary[c,f]	Attainment Status[g]
Sulfates	24-hour	25 µg/m^3	A	**No National Standards**		
Hydrogen Sulfide	1-hour	0.03 ppm (42 µg/m^3)	U			
Vinyl Chloride[i]	24-hour	0.01 ppm (26 µg/m^3)	–			
Visibility-Reducing Particle Matter	8-hour	Extinction coefficient of 0.23 per kilometer —visibility of 10 miles or more (0.07—30 miles or more for Lake Tahoe) because of particles when the relative humidity is less than 70%.	U			

[a] National standards (other than ozone, PM, and those based on annual averages or annual arithmetic means) are not to be exceeded more than once a year. The ozone standard is attained when the fourth highest 8-hour concentration in a year, averaged over 3 years, is equal to or less than the standard. The PM_{10} 24-hour standard is attained when 99% of the daily concentrations, averaged over 3 years, are equal to or less than the standard. The $PM_{2.5}$ 24-hour standard is attained when 98% of the daily concentrations, averaged over 3 years, are equal to or less than the standard. Contact the EPA for further clarification and current federal policies.

[b] California standards for ozone, CO (except Lake Tahoe), SO_2 (1- and 24-hour), NO_2, PM, and visibility-reducing particles are values that are not to be exceeded. All others are not to be equaled or exceeded. CAAQS are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations.

[c] Concentration expressed first in units in which it was promulgated [i.e., parts per million (ppm) or micrograms per cubic meter (µg/m^3)]. Equivalent units given in parentheses are based upon a reference temperature of 25°C and a reference pressure of 760 torr. Most measurements of air quality are to be corrected to a reference temperature of 25°C and a reference pressure of 760 torr; ppm in this table refers to ppm by volume, or micromoles of pollutant per mole of gas.

[d] Unclassified (U): a pollutant is designated unclassified if the data are incomplete and do not support a designation of attainment or nonattainment.
Attainment (A): a pollutant is designated attainment if the state standard for that pollutant was not violated at any site in the area during a 3-year period.
Nonattainment (N): a pollutant is designated nonattainment if there was a least one violation of a state standard for that pollutant in the area.
Nonattainment/Transitional (NT): is a subcategory of the nonattainment designation. An area is designated nonattainment/transitional to signify that the area is close to attaining the standard for that pollutant.

[e] National Primary Standards: The levels of air quality necessary, with an adequate margin of safety, to protect the public health.

[f] National Secondary Standards: The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.

[g] Nonattainment (N): any area that does not meet (or that contributes to ambient air quality in a nearby area that does not meet) the national primary or secondary ambient air quality standard for the pollutant.
Attainment (A): any area that meets the national primary or secondary ambient air quality standard for the pollutant.
Unclassifiable (U): any area that cannot be classified on the basis of available information as meeting or not meeting the national primary or secondary ambient air quality standard for the pollutant.

[h] The 1-hour ozone NAAQS was revoked on June 15, 2005 and the annual PM_{10} NAAQS was revoked in 2006.

[i] ARB has identified lead and vinyl chloride as toxic air contaminants with no threshold of exposure for adverse health effects determined. These actions allow for the implementation of control measures at levels below the ambient concentrations specified for this pollutant.

[j] U.S EPA lowered the 24-hour $PM_{2.5}$ standard from 65 µg/m^3 to 35 µg/m^3 in 2006. EPA issued attainment status designations for the 35 µg/m^{3}standard on December 22, 2008. EPA has designated the Bay Area as nonattainment for the 35 µg/m^3 $PM_{2.5}$ standard. The EPA designation will be effective 90 days after publication of the regulation in the Federal Register.

Table C.2
Common Sources of Health Effects for Criteria Air Pollutants

Pollutants	Sources	Health Effects
Ozone	Atmospheric reaction of organic gases with nitrogen oxides in sunlight	Aggravation of respiratory and cardiovascular diseases; reduced lung function; increased cough and chest discomfort
Fine Particulate Matter (PM_{10} and $PM_{2.5}$)	Stationary combustion of solid fuels; construction activities; industrial processes; atmospheric chemical reactions	Reduced lung function; aggravation of respiratory and cardiovascular diseases; increases in mortality rate; reduced lung function growth in children
Nitrogen Dioxide (NO_2)	Motor vehicle exhaust; high temperature stationary combustion; atmospheric reactions	Aggravation of respiratory illness
Carbon Monoxide (CO)	Incomplete combustion of fuels and other carbon-containing substances, such as motor vehicle exhaust; natural events, such as decomposition of organic matter	Aggravation of some heart diseases; reduced tolerance for exercise; impairment of mental function; birth defects; death at high levels of exposure
Sulfur Dioxide (SO_2)	Combination of sulfur-containing fossil fuels; smelting of sulfur-bearing metal ore; industrial processes	Aggravation of respiratory diseases; reduced lung function
Lead	Contaminated soil	Behavioral and hearing disabilities in children; nervous system impairment

Source: South Coast Air Quality Management District 2005; EPA 2009; EDAW 2009

Ozone, or smog, is not emitted directly into the environment, but is formed in the atmosphere by complex chemical reactions between ROG and NO_X in the presence of sunlight. Ozone formation is greatest on warm, windless, sunny days. The main sources of NO_X and ROG, often referred to as ozone precursors, are combustion processes (including motor vehicle engines) the evaporation of solvents, paints, and fuels, and biogenic sources. Automobiles are the single largest source of ozone precursors in the SFBAAB. Tailpipe emissions of ROG are highest during cold starts, hard acceleration, stop-and-go conditions, and slow speeds. They decline as speeds increase up to about 50 mph, then increase again at high speeds and high engine loads. ROG emissions associated with evaporation of unburned fuel depend on vehicle and ambient temperature cycles. Nitrogen oxide emissions exhibit a different curve; emissions decrease as the vehicle approaches 30 mph and then begin to increase with increasing speeds.

Ozone levels usually build up during the day and peak in the afternoon hours. Short-term exposure can irritate the eyes and cause constriction of the airways. Besides causing shortness of breath, it can aggravate existing respiratory diseases such as asthma, bronchitis and emphysema. Chronic exposure to high ozone levels can permanently damage lung tissue. Ozone can also damage plants and trees, and materials such as rubber and fabrics.

Particulate Matter refers to a wide range of solid or liquid particles in the atmosphere, including smoke, dust, aerosols, and metallic oxides. Respirable particulate matter with an aerodynamic diameter of 10 micrometers or less is referred to as PM_{10}. $PM_{2.5}$ includes a subgroup of finer particles that have an aerodynamic diameter of 2.5 micrometers or less. Some particulate matter,

such as pollen, is naturally occurring. In the SFBAAB most particulate matter is caused by combustion, factories, construction, grading, demolition, agricultural activities, and motor vehicles. Extended exposure to particulate matter can increase the risk of chronic respiratory disease. PM_{10} is of concern because it bypasses the body's natural filtration system more easily than larger particles, and can lodge deep in the lungs. The EPA and the state of California revised their PM standards several years ago to apply only to these fine particles. $PM_{2.5}$ poses an increased health risk because the particles can deposit deep in the lungs and contain substances that are particularly harmful to human health. Motor vehicles are currently responsible for about half of particulates in the SFBAAB. Wood burning in fireplaces and stoves is another large source of fine particulates.

Nitrogen Dioxide (NO_2) is a reddish-brown gas that is a by-product of combustion processes. Automobiles and industrial operations are the main sources of NO_2. Aside from its contribution to ozone formation, nitrogen dioxide can increase the risk of acute and chronic respiratory disease and reduce visibility. NO_2 may be visible as a coloring component of a brown cloud on high pollution days, especially in conjunction with high ozone levels.

Carbon Monoxide (CO) is an odorless, colorless gas. It is formed by the incomplete combustion of fuels. The single largest source of CO in the SFBAAB is motor vehicles. Emissions are highest during cold starts, hard acceleration, stop-and-go driving, and when a vehicle is moving at low speeds. New findings indicate that CO emissions per mile are lowest at about 45 mph for the average light-duty motor vehicle and begin to increase again at higher speeds. When inhaled at high concentrations, CO combines with hemoglobin in the blood and reduces the oxygen-carrying capacity of the blood. This results in reduced oxygen reaching the brain, heart and other body tissues. This condition is especially critical for people with cardiovascular diseases, chronic lung disease or anemia, as well as fetuses. Even healthy people exposed to high CO concentrations can experience headaches, dizziness, fatigue, unconsciousness, and even death.

Sulfur Dioxide (SO_2) is a colorless acid gas with a pungent odor. It has potential to damage materials and it can have health effects at high concentrations. It is produced by the combustion of sulfur-containing fuels, such as oil, coal and diesel. SO_2 can irritate lung tissue and increase the risk of acute and chronic respiratory disease.

Lead is a metal found naturally in the environment as well as in manufactured products. The major sources of lead emissions have historically been mobile and industrial sources. As a result of the phase-out of leaded gasoline, metal processing is currently the primary source of lead emissions. The highest levels of lead in air are generally found near lead smelters. Other stationary sources are waste incinerators, utilities, and lead-acid battery manufacturers.

Twenty years ago, mobile sources were the main contributor to ambient lead concentrations in the air. In the early 1970s, the EPA set national regulations to gradually reduce the lead content in gasoline. In 1975, unleaded gasoline was introduced for motor vehicles equipped with catalytic converters. The EPA banned the use of leaded gasoline in highway vehicles in December 1995. As a result of the EPA's regulatory efforts to remove lead from gasoline, emissions of lead from the transportation sector and levels of lead in the air decreased dramatically.

Monitoring Data

The BAAQMD operates a regional air quality monitoring network that regularly measures the concentrations of the five major criteria air pollutants. Air pollutant monitoring data is available at http://www.arb.ca.gov/adam/welcome.html. Air quality conditions in the SFBAAB have improved significantly since the BAAQMD was created in 1955. Ambient concentrations and the number of days on which the region exceeds standards have declined dramatically. Neither State nor

national ambient air quality standards of these chemicals have been violated in recent decades for nitrogen dioxide, sulfur dioxide, sulfates, lead, hydrogen sulfide, and vinyl chloride.

Emissions Inventory

The BAAQMD estimates emissions of criteria air pollutants from approximately nine hundred source categories. The estimates are based on BAAQMD permit information for stationary sources (e.g., manufacturing industries, refineries, dry-cleaning operations), plus more generalized estimates for area sources (e.g., space heating, landscaping activities, use of consumer products) and mobile sources (e.g., trains, ships and planes, as well as on-road and off-road motor vehicles). BAAQMD emissions inventory data is available at http://www.arb.ca.gov/ei/maps/statemap/dismap.htm.

C.1.2. Existing Ambient Air Quality: Toxic Air Contaminants

In addition to the criteria air pollutants listed above, another group of pollutants, commonly referred to as toxic air contaminants (TACs) or hazardous air pollutants can result in health effects that can be quite severe. Many TACs are confirmed or suspected carcinogens, or are known or suspected to cause birth defects or neurological damage. Secondly, many TACs can be toxic at very low concentrations. For some chemicals, such as carcinogens, there are no thresholds below which exposure can be considered risk-free.

Industrial facilities and mobile sources are significant sources of TACs. The electronics industry, including semiconductor manufacturing, has the potential to contaminate both air and water due to the highly toxic chlorinated solvents commonly used in semiconductor production processes. Sources of TACs go beyond industry. Various common urban facilities also produce TAC emissions, such as gasoline stations (benzene), hospitals (ethylene oxide), and dry cleaners (perchloroethylene). Automobile exhaust also contains TACs such as benzene and 1,3-butadiene. Most recently, diesel particulate matter was identified as a TAC by the ARB. Diesel PM differs from other TACs in that it is not a single substance but rather a complex mixture of hundreds of substances. BAAQMD research indicates that mobile-source emissions of diesel PM, benzene, and 1,3-butadiene represent a substantial portion of the ambient background risk from TACs in the SFBAAB.

C.1.3. Greenhouse Gases and Global Climate Change

Unlike emissions of criteria and toxic air pollutants, which have local or regional impacts, emissions of greenhouse gases (GHGs) that contribute to global warming or global climate change have a broader, global impact. Global warming is a process whereby GHGs accumulating in the atmosphere contribute to an increase in the temperature of the earth's atmosphere. The principal GHGs contributing to global warming are carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), and fluorinated compounds. The primary GHGs of concern are summarized in Table C.3. These gases allow visible and ultraviolet light from the sun to pass through the atmosphere, but they prevent heat from escaping back out into space. Among the potential implications of global warming are rising sea levels, and adverse impacts to water supply, water quality, agriculture, forestry, and habitats. In addition, global warming may increase electricity demand for cooling, decrease the availability of hydroelectric power, and affect regional air quality and public health. Like most criteria and toxic air pollutants, much of the GHG production comes from motor vehicles. GHG emissions can be reduced to some degree by improved coordination of land use and transportation planning on the city, county, and subregional level, and other measures to reduce automobile use. Energy conservation measures also can contribute to reductions in GHG emissions.

Table C.3 Examples of Greenhouse Gases	
Gas	Sources
Carbon dioxide (CO_2)	Fossil fuel combustion in stationary and point sources; emission sources includes burning of oil, coal, gas.
Methane (CH_4)	Incomplete combustion in forest fires, landfills, and leaks in natural gas and petroleum systems, agricultural activities, coal mining, wastewater treatment, and certain industrial processes.
Nitrous oxide (N_2O)	Fossil fuel combustion in stationary and point sources; other emission sources include agricultural soil management, animal manure management, sewage treatment, adipic acid production, and nitric acid production.
Chlorofluorocarbon (CFC), and Hydro-chlorofluorocarbon (HCFC)	Agents used in production of foam insulation; other sources include air conditioners, refrigerators, and solvents in cleaners.
Sulfur hexafluoride (SF_6)	Electric insulation in high voltage equipment that transmits and distributes electricity, including circuit breakers, gas-insulated substations, and other switchgear used in the transmission system to manage the high voltages carried between generating stations and customer load centers.
Perfluorocarbons (PFC's)	Primary aluminum production and semiconductor manufacturing.
Source: EPA 2009	

California Greenhouse Gas Emissions Inventory

Emissions of GHGs contributing to global climate change are attributable in large part to human activities associated with the transportation, industrial/manufacturing, utility, residential, commercial and agricultural sectors. In California, the transportation sector is the largest emitter of GHGs, followed by electricity generation. Emissions of CO_2 are byproducts of fossil fuel combustion. CH_4, a highly potent GHG, results from off-gassing (the release of chemicals from nonmetallic substances under ambient or greater pressure conditions) is largely associated with agricultural practices and landfills. N_2O is also largely attributable to agricultural practices and soil management. CO_2 sinks, or reservoirs, include vegetation and the ocean, which absorb CO_2 through sequestration and dissolution, respectively, two of the most common processes of CO_2 sequestration.

California produced 474 million gross metric tons (MMT) of CO_2 equivalent (CO_2e) averaged over the period from 2002-2004. CO_2e is a measurement used to account for the fact that different GHGs have different potential to retain infrared radiation in the atmosphere and contribute to the greenhouse effect. This potential, known as the global warming potential (GWP) of a GHG, is dependent on the lifetime, or persistence, of the gas molecule in the atmosphere. For example, one ton of CH_4 has the same contribution to the greenhouse effect as approximately 23 tons of CO_2. Therefore, CH_4 is a much more potent GHG than CO_2. Expressing emissions in CO_2e takes the contributions of all GHG emissions to the greenhouse effect and converts them to a single unit equivalent to the effect that would occur if only CO_2 were being emitted.

Combustion of fossil fuel in the transportation sector was the single largest source of California's GHG emissions in 2002-2004, accounting for 38 percent of total GHG emissions in the state. This sector was followed by the electric power sector (including both in-state and out-of-state sources) (18 percent) and the industrial sector (21 percent).

California Greenhouse Gas Emissions Projections

The 1990 GHG emissions limit is approximately 430 MMT CO_2e, which must be met in California by 2020 per the requirements of AB 32 (discussed below in the Regulatory Setting). ARB's GHG inventory for all emissions sectors would require an approximate 28 percent reduction in GHG emissions from projected 2020 forecasts to meet the target emissions limit (equivalent to levels in 1990) established in AB 32. The AB 32 Scoping Plan, discussed further below, is ARB's plan for meeting this mandate.

C.1.4. Existing Ambient Air Quality: Odors and Dust

Other air quality issues of concern in the SFBAAB include nuisance impacts of odors and dust. Objectionable odors may be associated with a variety of pollutants. Common sources of odors include wastewater treatment plants, landfills, composting facilities, refineries and chemical plants. Similarly, nuisance dust may be generated by a variety of sources including quarries, agriculture, grading and construction. Odors rarely have direct health impacts, but they can be very unpleasant and can lead to anger and concern over possible health effects among the public. Each year the BAAQMD receives thousands of citizen complaints about objectionable odors. Dust emissions can contribute to increased ambient concentrations of PM_{10}, and can also contribute to reduced visibility and soiling of exposed surfaces.

REGULATORY SETTING

Air quality with respect to criteria air pollutants and TACs within the SFBAAB is regulated by such agencies as the BAAQMD, ARB, and EPA. Each of these agencies develops rules, regulations, policies, and/or goals to attain the goals or directives imposed through legislation. Although the EPA regulations may not be superseded, both state and local regulations may be more stringent.

C.1.5. Criteria Air Pollutants

Federal Air Quality Regulations

U.S. Environmental Protection Agency

At the federal level, EPA has been charged with implementing national air quality programs. EPA's air quality mandates are drawn primarily from the Federal Clean Air Act (FCAA), which was enacted in 1963. The FCAA was amended in 1970, 1977, and 1990.

The FCAA required EPA to establish primary and secondary NAAQS, which are available at http://www.arb.ca.gov/research/aaqs/aaqs2.pdf. The FCAA also required each state to prepare an air quality control plan referred to as a State Implementation Plan (SIP). The Federal Clean Air Act Amendments of 1990 (FCAAA) added requirements for states with nonattainment areas to revise their SIPs to incorporate additional control measures to reduce air pollution. The SIP is periodically modified to reflect the latest emissions inventories, planning documents, and rules and regulations of the air basins as reported by their jurisdictional agencies. EPA has responsibility to review all state SIPs to determine conformation to the mandates of the FCAAA and determine if implementation will achieve air quality goals. If the EPA determines a SIP to be inadequate, a Federal Implementation Plan (FIP) may be prepared for the nonattainment area that imposes additional control measures. Failure to submit an approvable SIP or to implement the plan within the mandated timeframe may result in sanctions being applied to transportation funding and stationary air pollution sources in the air basin.

State Air Quality Regulations

In 1992 and 1993, the California Air Resources Board (CARB) requested delegation of authority for the implementation and enforcement of specified New Source Performance Standards

(NSPS) and National Emission Standards for Hazardous Air Pollutants (NESHAPS) to the following local agencies: Bay Area and South Coast Air Quality Management Districts (AQMDs). EPA's review of the State of California's laws, rules, and regulations showed them to be adequate for the implementation and enforcement of these federal standards, and EPA granted the delegations as requested.

California Air Resources Board

ARB is the agency responsible for coordination and oversight of state and local air pollution control programs in California and for implementing the California Clean Air Act (CCAA), which was adopted in 1988. The CCAA requires that all air districts in the state endeavor to achieve and maintain the CAAQS by the earliest practical date. The act specifies that districts should focus particular attention on reducing the emissions from transportation and area-wide emission sources, and provides districts with the authority to regulate indirect sources.

ARB is primarily responsible for developing and implementing air pollution control plans to achieve and maintain the NAAQS. The ARB is primarily responsibility for statewide pollution sources and produces a major part of the SIP. Local air districts are still relied upon to provide additional strategies for sources under their jurisdiction. The ARB combines this data and submits the completed SIP to EPA.

Other ARB duties include monitoring air quality (in conjunction with air monitoring networks maintained by air pollution control and air quality management districts), establishing CAAQS (which in many cases are more stringent than the NAAQS), determining and updating area designations and maps, and setting emissions standards for new mobile sources, consumer products, small utility engines, and off-road vehicles.

Transport of Pollutants

The California Clean Air Act, Section 39610 (a), directs the ARB to “identify each district in which transported air pollutants from upwind areas outside the district cause or contribute to a violation of the ozone standard and to identify the district of origin of transported pollutants.” The information regarding the transport of air pollutants from one basin to another was to be quantified to assist interrelated basins in the preparation of plans for the attainment of State ambient air quality standards. Numerous studies conducted by the ARB have identified air basins that are impacted by pollutants transported from other air basins (as of 1993). Among the air basins affected by air pollution transport from the SFBAAB are the North Central Coast Air Basin, the Mountain Counties Air Basin, the San Joaquin Valley Air Basin, and the Sacramento Valley Air Basin. The SFBAAB was also identified as an area impacted by the transport of air pollutants from the Sacramento region.

Local Air Quality Regulations

Bay Area Air Quality Management District

The BAAQMD attains and maintains air quality conditions in the SFBAAB through a comprehensive program of planning, regulation, enforcement, technical innovation, and promotion of the understanding of air quality issues. The clean air strategy of the BAAQMD includes the preparation of plans for the attainment of ambient air quality standards, adoption and enforcement of rules and regulations concerning sources of air pollution, and issuance of permits for stationary sources of air pollution. The BAAQMD also inspects stationary sources of air pollution and responds to citizen complaints, monitors ambient air quality and meteorological conditions, and implements programs and regulations required by the FCAA, FCAAA, and the CCAA.

In 2009, the BAAQMD released the update to its CEQA Guidelines. This is an advisory document that provides the Lead Agency, consultants, and project applicants with uniform procedures for

addressing air quality in environmental documents. The handbook contains the following applicable components:

1. Criteria and thresholds for determining whether a project may have a significant adverse air quality impact;
2. Specific procedures and modeling protocols for quantifying and analyzing air quality impacts;
3. Methods available to mitigate air quality impacts;
4. Information for use in air quality assessments and environmental documents that will be updated more frequently such as air quality data, regulatory setting, climate, topography.

Air Quality Plans

As stated above, the BAAQMD prepares plans to attain ambient air quality standards in the SFBAAB. The BAAQMD prepares ozone attainment plans (OAP) for the national ozone standard and clean air plans (CAP) for the California standard both in coordination with the Metropolitan Transportation Commission and the Association of Bay Area Governments (ABAG).

With respect to applicable air quality plans, the BAAQMD prepared the *2010 Clean Air Plan* to address nonattainment of the national 1-hour ozone standard in the SFBAAB. The purpose of the 2010 Clean Air Plan is to:

1. Update the Bay Area 2005 Ozone Strategy in accordance with the requirements of the California Clean Air Act to implement “all feasible measures” to reduce ozone;
2. Consider the impacts of ozone control measures on particulate matter (PM), air toxics, and greenhouse gases in a single, integrated plan;
3. Review progress in improving air quality in recent years;
4. Establish emission control measures to be adopted or implemented in the 2009-2012 timeframe.

Similarly, the BAAQMD prepared the 2010 Clean Air Plan to address nonattainment of the CAAQS.

C.1.6. Toxic Air Contaminants

TACs, or in federal parlance under the FCAA, HAPs, are pollutants that result in an increase in mortality, a serious illness, or pose a present or potential hazard to human health. Health effects of TACs may include cancer, birth defects, and immune system and neurological damage.

TACs can be separated into carcinogens and noncarcinogens based on the nature of the physiological degradation associated with exposure to the pollutant. For regulatory purposes, carcinogens are assumed to have no safe threshold below which heath impacts will not occur. Noncarcinogenic TACs differ in that there is a safe level in which it is generally assumed that no negative health impacts would occur. These levels are determined on a pollutant-by-pollutant basis.

It is important to understand that TACs are not considered criteria air pollutants and thus are not specifically addressed through the setting of ambient air quality standards. Instead, the EPA and ARB regulate HAPs and TACs, respectively, through statutes and regulations that generally require the use of the maximum or best available control technology (MACT and BACT) to limit emissions. These in conjunction with additional rules set forth by the BAAQMD establish the regulatory framework for TACs.

Federal Hazardous Air Pollutant Program

Title III of the FCAAA requires the EPA to promulgate national emissions standards for hazardous air pollutants (NESHAPs). The NESHAP may differ for major sources than for area sources of HAPs (major sources are defined as stationary sources with potential to emit more than 10 tons per year [TPY] of any HAP or more than 25 TPY of any combination of HAPs; all other sources are considered area sources). The emissions standards are to be promulgated in two phases. In the first phase (1992–2000), the EPA developed technology-based emission standards designed to produce the maximum emission reduction achievable. These standards are generally referred to as requiring MACT. These federal rules are also commonly referred to as MACT standards, because they reflect the Maximum Achievable Control Technology. For area sources, the standards may be different, based on generally available control technology. In the second phase (2001–2008), the EPA is required to promulgate health risk–based emissions standards where deemed necessary to address risks remaining after implementation of the technology-based NESHAP standards. The FCAAA required the EPA to promulgate vehicle or fuel standards containing reasonable requirements that control toxic emissions, at a minimum to benzene and formaldehyde. Performance criteria were established to limit mobile-source emissions of toxics, including benzene, formaldehyde, and 1,3-butadiene. In addition, §219 required the use of reformulated gasoline in selected U.S. cities (those with the most severe ozone nonattainment conditions) to further reduce mobile-source emissions.

State Toxic Air Contaminant Programs

California regulates TACs primarily through the Tanner Air Toxics Act (AB 1807) and the Air Toxics Hot Spots Information and Assessment Act of 1987 (AB 2588). The Tanner Act sets forth a formal procedure for ARB to designate substances as TACs. This includes research, public participation, and scientific peer review before ARB can designate a substance as a TAC. To date, ARB has identified over 21 TACs, and adopted the EPA's list of HAPs as TACs. Most recently, diesel exhaust particulate was added to the ARB list of TACs. Once a TAC is identified, ARB's then adopts an Airborne Toxics Control Measure for sources that emit that particular TAC. If there is a safe threshold for a substance at which there is no toxic effect, the control measure must reduce exposure below that threshold. If there is no safe threshold, the measure must incorporate TBACT to minimize emissions. None of the TACs identified by ARB have a safe threshold.

The Hot Spots Act requires that existing facilities that emit toxic substances above specified level:

1. Prepare a toxic emission inventory;
2. Prepare a risk assessment if emissions are significant;
3. Notify the public of significant risk levels;
4. Prepare and implement risk reduction measure.

ARB has adopted diesel exhaust control measures and more stringent emission standards for various on-road mobile sources of emissions, including transit buses, and off-road diesel equipment (e.g., tractors, generators). In February 2000, ARB adopted a new public transit bus fleet rule and emission standards for new urban buses. These new rules and standards provide for 1) more stringent emission standards for some new urban bus engines beginning with 2002 model year engines, 2) zero-emission bus demonstration and purchase requirements applicable to transit agencies, and 3) reporting requirements with which transit agencies must demonstrate compliance with the urban transit bus fleet rule. Upcoming milestones include the low sulfur diesel fuel requirement, and tighter emission standards for heavy-duty diesel trucks (2007) and off-road diesel equipment (2011) nationwide. Over time, the replacement of older vehicles will result in a vehicle fleet that produces substantially less TACs than under current conditions. Mobile-source emissions of TACs (e.g., benzene, 1-3-butadiene, diesel PM) have been reduced

significantly over the last decade, and will be reduced further in California through a progression of regulatory measures [e.g., Low Emission Vehicle/Clean Fuels and Phase II reformulated gasoline regulations) and control technologies. With implementation of ARB's Risk Reduction Plan, it is expected that diesel PM concentrations will be reduced by 75% in 2010 and 85% in 2020 from the estimated year 2000 level. Adopted regulations are also expected to continue to reduce formaldehyde emissions from cars and light-duty trucks. As emissions are reduced, it is expected that risks associated with exposure to the emissions will also be reduced.

Local Air Quality Regulations

Bay Area Air Quality Management District

The BAAQMD has regulated TACs since the 1980s. At the local level, air pollution control or management districts may adopt and enforce ARB's control measures. Under BAAQMD Regulation 2-1 (General Permit Requirements), Regulation 2-2 (New Source Review), and Regulation 2-5 (New Source Review), all nonexempt sources that possess the potential to emit TACs are required to obtain permits from BAAQMD. Permits may be granted to these operations if they are constructed and operated in accordance with applicable regulations, including new source review standards and air toxics control measures. The BAAQMD limits emissions and public exposure to TACs through a number of programs. The BAAQMD prioritizes TAC-emitting stationary sources based on the quantity and toxicity of the TAC emissions and the proximity of the facilities to sensitive receptors. In addition, the BAAQMD has adopted Regulation 11 Rules 2 and 14, which address asbestos demolition renovation, manufacturing, and standards for asbestos containing serpentine.

C.1.7. Greenhouse Gases and Global Climate Change

Federal Greenhouse Gas Regulations

Supreme Court Ruling

The U.S. Environmental Protection Agency (EPA) is the Federal agency responsible for implementing the Clean Air Act (CAA). The U.S. Supreme Court ruled in its decision in *Massachusetts et al. v. Environmental Protection Agency* et al. ([2007] 549 U.S. 05-1120), issued on April 2, 2007, that carbon dioxide (CO_2) is an air pollutant as defined under the CAA, and that EPA has the authority to regulate emissions of GHGs.

EPA Actions

In response to the mounting issue of climate change, EPA has taken actions to regulate, monitor, and potentially reduce GHG emissions.

Mandatory Greenhouse Gas Reporting Rule

On September 22, 2009, EPA issued a final rule for mandatory reporting of GHGs from large GHG emissions sources in the United States. In general, this national reporting requirement will provide EPA with accurate and timely GHG emissions data from facilities that emit 25,000 metric tons or more of CO2 per year. This publically available data will allow the reporters to track their own emissions, compare them to similar facilities, and aid in identifying cost effective opportunities to reduce emissions in the future. Reporting is at the facility level, except that certain suppliers of fossil fuels and industrial greenhouse gases along with vehicle and engine manufacturers will report at the corporate level. An estimated 85% of the total U.S. GHG emissions, from approximately 10,000 facilities, are covered by this final rule.

Proposed Endangerment and Cause or Contribute Findings for Greenhouse Gases under the Clean Air Act

On April 23, 2009, EPA published their Proposed Endangerment and Cause or Contribute Findings for Greenhouse Gases under the CCA (Endangerment Finding) in the Federal Register. The Endangerment Finding is based on Section 202(a) of the CAA, which states that the Administrator (of EPA) should regulate and develop standards for "emission[s] of air pollution from any class of classes of new motor vehicles or new motor vehicle engines, which in [its] judgment cause, or contribute to, air pollution which may reasonably be anticipated to endanger public health or welfare." The proposed rule addresses Section 202(a) in two distinct findings. The first addresses whether or not the concentrations of the six key GHGs (i.e., carbon dioxide [CO_2], methane [CH_4], nitrous oxide [N_2O], hydrofluorocarbons [HFCs], perflurorocarbons [PFCs], and sulfur hexafluoride [SF_6]) in the atmosphere threaten the public health and welfare of current and future generations. The second addresses whether or not the combined emissions of GHGs from new motor vehicles and motor vehicle engines contribute to atmospheric concentrations of GHGs and therefore the threat of climate change.

The Administrator proposed the finding that atmospheric concentrations of GHGs endanger the public health and welfare within the meaning of Section 202(a) of the CCA. The evidence supporting this finding consists of human activity resulting in "high atmospheric levels" of GHG emissions, which are very likely responsible for increases in average temperatures and other climatic changes. Furthermore, the observed and projected results of climate change (e.g., higher likelihood of heat waves, wild fires, droughts, sea level rise, higher intensity storms) are a threat to the public health and welfare. Therefore, GHGs were found to endanger the public health and welfare of current and future generations.

The Administrator also proposed the finding that GHG emissions from new motor vehicles and motor vehicle engines are contributing to air pollution, which is endangering public health and welfare. The proposed finding cites that in 2006, motor vehicles were the second largest contributor to domestic GHG emissions (24 percent of total) behind electricity generation. Furthermore, in 2005, the U.S. was responsible for 18 percent of global GHG emissions. Therefore, GHG emissions from motor vehicles and motor vehicle engines were found to contribute to air pollution that endangers public health and welfare.

State Greenhouse Gas Regulations

Assembly Bill 1493 (2002)

In 2002, then-Governor Gray Davis signed Assembly Bill (AB) 1493. AB 1493 requires that ARB develop and adopt, by January 1, 2005, regulations that achieve "the maximum feasible reduction of greenhouse gases emitted by passenger vehicles and light-duty trucks and other vehicles determined by ARB to be vehicles whose primary use is noncommercial personal transportation in the state."

To meet the requirements of AB 1493, in 2004 ARB approved amendments to the California Code of Regulations (CCR) adding GHG emissions standards to California's existing standards for motor vehicle emissions. Amendments to CCR Title 13, Sections 1900 and 1961 (13 CCR 1900, 1961), and adoption of Section 1961.1 (13 CCR 1961.1) require automobile manufacturers to meet fleet-average GHG emissions limits for all passenger cars, light-duty trucks within various weight criteria, and medium-duty passenger vehicle weight classes (i.e., any medium-duty vehicle with a gross vehicle weight rating less than 10,000 pounds that is designed primarily for the transportation of persons), beginning with the 2009 model year. For passenger cars and light-duty trucks with a loaded vehicle weight (LVW) of 3,750 pounds or less, the GHG emission limits for the 2016 model year are approximately 37percent lower than the limits for the first year of the regulations, the 2009 model year. For light-duty trucks with LVW of 3,751 pounds to gross vehicle

weight (GVW) of 8,500 pounds, as well as medium-duty passenger vehicles, GHG emissions would be reduced approximately 24 percent between 2009 and 2016.

In December 2004, a group of car dealerships, automobile manufacturers, and trade groups representing automobile manufacturers filed suit against ARB to prevent enforcement of 13 CCR Sections 1900 and 1961 as amended by AB 1493 and 13 CCR 1961.1 (*Central Valley Chrysler-Jeep et al. v. Catherine E. Witherspoon, in Her Official Capacity as Executive Director of the California Air Resources Board, et al.*). The auto-makers' suit in the U.S. District Court for the Eastern District of California, contended California's implementation of regulations that, in effect, regulate vehicle fuel economy violates various federal laws, regulations, and policies.

On December 12, 2007, the Court found that if California receives appropriate authorization from EPA (the last remaining factor in enforcing the standard), these regulations would be consistent with and have the force of federal law, thus, rejecting the automakers' claim. This authorization to implement more stringent standards in California was requested in the form of a CAA Section 209, subsection (b) waiver in 2005. Since that time, EPA failed to act on granting California authorization to implement the standards. Governor Schwarzenegger and Attorney General Edmund G. Brown filed suit against EPA for the delay. In December 2007, EPA Administrator Stephen Johnson denied California's request for the waiver to implement AB 1493. Johnson cited the need for a national approach to reducing GHG emissions, the lack of a "need to meet compelling and extraordinary conditions", and the emissions reductions that would be achieved through the Energy Independence and Security Act of 2007 as the reasoning for the denial.

The state of California filed suit against EPA for its decision to deny the CAA waiver. The recent change in presidential administration directed EPA to reexamine its position for denial of California's CAA waiver and for its past opposition to GHG emissions regulation. California received the waiver, notwithstanding the previous denial by EPA, on June 30, 2009.

Assembly Bill 32 (2006), California Global Warming Solutions Act

In September 2006, the governor of California signed AB 32 (Chapter 488, Statutes of 2006), the California Global Warming Solutions Act of 2006, which enacted Sections 38500–38599 of the California Health and Safety Code. AB 32 requires the reduction of statewide GHG emissions to 1990 levels by 2020. This equates to an approximate 15 percent reduction compared to existing statewide GHG emission levels or a 30 percent reduction from projected 2020 "business as usual" emission levels. The required reduction will be accomplished through an enforceable statewide cap on GHG emissions beginning in 2012.

To effectively implement the statewide cap on GHG emissions, AB 32 directs ARB to develop and implement regulations that reduce statewide GHG emissions generated by stationary sources. Specific actions required of ARB under AB 32 include adoption of a quantified cap on GHG emissions that represent 1990 emissions levels along with disclosing how the cap was quantified, institution of a schedule to meet the emissions cap, and development of tracking, reporting, and enforcement mechanisms to ensure that the state achieves the reductions in GHG emissions needed to meet the cap.

In addition, AB 32 states that if any regulations established under AB 1493 (2002) cannot be implemented then ARB is required to develop additional, new regulations to control GHG emissions from vehicles as part of AB 32.

AB 32 Climate Change Scoping Plan

In December 2008, ARB adopted its *Climate Change Scoping Plan*, which contains the main strategies California will implement to achieve reduction of approximately 169 million metric tons (MMT) of CO_2e, or approximately 30% from the state's projected 2020 emission level of 596 MMT of CO_2e under a business-as-usual scenario (this is a reduction of 42 MMT CO_2e, or almost 10%,

from 2002-2004 average emissions). The *Scoping Plan* also includes ARB-recommended GHG reductions for each emissions sector of the state's GHG inventory. The Scoping Plan calls for the largest reductions in GHG emissions to be achieved by implementing the following measures and standards:

- improved emissions standards for light-duty vehicles (estimated reductions of 31.7 MMT CO_2e);
- the Low-Carbon Fuel Standard (15.0 MMT CO_2e);
- energy efficiency measures in buildings and appliances and the widespread development of combined heat and power systems (26.3 MMT CO_2e); and
- a renewable portfolio standard for electricity production (21.3 MMT CO_2e).

ARB has not yet determined what amount of GHG reductions it recommends from local government operations; however, the *Scoping Plan* does state that land use planning and urban growth decisions will play an important role in the state's GHG reductions because local governments have primary authority to plan, zone, approve, and permit how land is developed to accommodate population growth and the changing needs of their jurisdictions(meanwhile, ARB is also developing an additional protocol for community emissions). ARB further acknowledges that decisions on how land is used will have large impacts on the GHG emissions that will result from the transportation, housing, industry, forestry, water, agriculture, electricity, and natural gas emission sectors. The *Scoping Plan* states that the ultimate GHG reduction assignment to local government operations is to be determined (ARB 2008). With regard to land use planning, the *Scoping Plan* expects approximately 5.0 MMT CO_2e will be achieved associated with implementation of SB 375, which is discussed further below.

Senate Bills 1078 and 107 and Executive Order S-14-08

SB 1078 (Chapter 516, Statutes of 2002) requires retail sellers of electricity, including investor-owned utilities and community choice aggregators, to provide at least 20 percent of their supply from renewable sources by 2017. SB 107 (Chapter 464, Statutes of 2006) changed the target date to 2010. In November 2008 Governor Schwarzenegger signed Executive Order S-14-08, which expands the state's Renewable Energy Standard to 33 percent renewable power by 2020. Governor Schwarzenegger plans to propose legislative language that will codify the new higher standard.

Senate Bill 1368 (2006)

SB 1368 is the companion bill of AB 32 and was signed by Governor Schwarzenegger in September 2006. SB 1368 requires the California Public Utilities Commission (PUC) to establish a greenhouse gas emission performance standard for baseload generation from investor owned utilities by February 1, 2007. The California Energy Commission (CEC) must establish a similar standard for local publicly owned utilities by June 30, 2007. These standards cannot exceed the greenhouse gas emission rate from a baseload combined-cycle natural gas fired plant. The legislation further requires that all electricity provided to California, including imported electricity, must be generated from plants that meet the standards set by the PUC and CEC.

Senate Bill 97 (2007)

SB 97, signed by governor of California in August 2007 (Chapter 185, Statutes of 2007; Public Resources Code, Sections 21083.05 and 21097), acknowledges climate change is a prominent environmental issue that requires analysis under CEQA. This bill directed the Governor's Office of Planning and Research (OPR) to prepare, develop, and transmit to the California Resources Agency by July 1, 2009 guidelines for mitigating GHG emissions or the effects of GHG emissions,

as required by CEQA. The California Resources Agency is required to certify and adopt these guidelines by January 1, 2010.

This bill also removes, both retroactively and prospectively, as legitimate causes of action in litigation any claim of inadequate CEQA analysis of effects of GHG emissions associated with environmental review for projects funded by the Highway Safety, Traffic Reduction, Air Quality and Port Security Bond Act of 2006 (Proposition 1B) or the Disaster Preparedness and Flood Protection Bond Act of 2006 (Proposition 1E). This provision will be repealed by provision of law on January 1, 2010 at that time such projects, if any remain unapproved, will no longer enjoy protection against litigation claims based on failure to adequately address issues related to GHG emissions.

Senate Bill 375 (2008)

SB 375, signed in September 2008, aligns regional transportation planning efforts, regional GHG reduction targets, and land use and housing allocation. As part of the alignment, SB 375 requires Metropolitan Planning Organizations (MPOs) to adopt a Sustainable Communities Strategy (SCS) or Alternative Planning Strategy (APS) which prescribes land use allocation in that MPO's Regional Transportation Plan (RTP). The ARB, in consultation with MPOs, is required to provide each affected region with reduction targets for GHGs emitted by passenger cars and light trucks in the region for the years 2020 and 2035. These reduction targets will be updated every 8 years but can be updated every 4 years if advancements in emissions technologies affect the reduction strategies to achieve the targets. The ARB is also charged with reviewing each MPO's SCS or APS for consistency with its assigned GHG emission reduction targets. If MPOs do not meet the GHG reduction targets, transportation projects located in the MPO boundaries would not be eligible for funding programmed after January 1, 2012.

This bill also extends the minimum time period for the Regional Housing Needs Allocation (RNHA) cycle from 5 years to 8 years for local governments located in an MPO that meets certain requirements. City or County land use policies (e.g., General Plans) are not required to be consistent with the RTP including associated SCSs or APSs. Qualified projects consistent with an approved SCS or APS and categorized as "transit priority projects" would receive incentives under new provisions of CEQA.

Executive Order S-3-05 (2005)

Governor Schwarzenegger signed Executive Order S-3-05 on June 1, 2005 which proclaimed California is vulnerable to the impacts of climate change. The executive order declared increased temperatures could reduce snowpack in the Sierra Nevada Mountains, further exacerbate California's air quality problems, and potentially cause a rise in sea levels. To combat those concerns, the executive order established targets for total GHG emissions which include reducing GHG emissions to the 2000 level by 2010, to the 1990 level by 2020, and to 80 percent below the 1990 level by 2050.

The executive order also directed the secretary of the California Environmental Protection Agency to coordinate a multiagency effort to reduce GHG emissions to the target levels. The secretary will submit biannual reports to the governor and legislature describing progress made toward reaching the emission targets; impacts of global warming on California's resources; and mitigation and adaptation plans to combat impacts of global warming.

To comply with the executive order, the Secretary of the California Environmental Protection Agency created the California Climate Action Team which is made up of members from various state agencies and commissions. The California Climate Action Team released its first report in March 2006 of which proposed achieving the GHG emissions targets by building on voluntary

actions of California businesses and actions by local governments and communities along with continued implementation of state incentive and regulatory programs.

Executive Order S-13-08

Governor Schwarzenegger signed Executive Order S-13-08 on November 14, 2008 which directs California to develop methods for adapting to climate change through preparation of a statewide plan. The executive order directs OPR, in cooperation with the California Resources Agency (CRA), to provide land use planning guidance related to sea level rise and other climate change impacts by May 30, 2009. The order also directs the CRA to develop a state Climate Adaptation Strategy by June 30, 2009 and to convene an independent panel to complete the first California Sea Level Rise Assessment Report. The assessment report is required to be completed by December 1, 2010 and required to include the following four items:

1. Project the relative sea level rise specific to California by taking into account issues such as coastal erosion rates, tidal impacts, El Niño and La Niña events, storm surge, and land subsidence rates;
2. Identify the range of uncertainty in selected sea level rise projections;
3. Synthesize existing information on projected sea level rise impacts to state infrastructure (e.g., roads, public facilities, beaches), natural areas, and coastal and marine ecosystems; and
4. Discuss future research needs relating to sea level rise in California.

Executive Order S-1-07

Governor Schwarzenegger signed Executive Order S-1-07 in 2007 which proclaimed the transportation sector as the main source of GHG emissions in California. The executive order proclaims the transportation sector accounts for over 40 percent of statewide GHG emissions. The executive order also establishes a goal to reduce the carbon intensity of transportation fuels sold in California by a minimum of 10 percent by 2020.

In particular, the executive order established a Low-Carbon Fuel Standard (LCFS) and directed the Secretary for Environmental Protection to coordinate the actions of the CEC, the ARB, the University of California, and other agencies to develop and propose protocols for measuring the "life-cycle carbon intensity" of transportation fuels. This analysis supporting development of the protocols was included in the State Implementation Plan for alternative fuels (*State Alternative Fuels Plan* adopted by CEC on December 24, 2007) and was submitted to ARB for consideration as an "early action" item under AB 32. The ARB adopted the LCFS on April 23, 2009.

Local Greenhouse Gas Regulations

Bay Area Air Quality Management District Climate Protection Program

The BAAQMD established a climate protection program to reduce pollutants that contribute to global climate change and affect air quality in the SFBAAB. The climate protection program includes measures that promote energy efficiency, reduce vehicle miles traveled, and develop alternative sources of energy all of which assist in reducing emissions of GHG and in reducing air pollutants that affect the health of residents. BAAQMD also seeks to support current climate protection programs in the region and to stimulate additional efforts through public education and outreach, technical assistance to local governments and other interested parties, and promotion of collaborative efforts among stakeholders.

D. THRESHOLDS OF SIGNIFICANCE JUSTIFICATION

BAY AREA AIR QUALITY MANAGEMENT DISTRICT

California Environmental Quality Act Guidelines Update

Thresholds of Significance

June 2, 2010

BAY AREA AIR QUALITY MANAGEMENT DISTRICT

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BAY AREA AIR QUALITY MANAGEMENT DISTRICT

Bay Area Air Quality Management District

Air Quality CEQA Thresholds of Significance

1. INTRODUCTION

Bay Area Air Quality Management District (BAAQMD or Air District) staff analyzed various options for California Environmental Quality Act (CEQA) air quality thresholds of significance for use within BAAQMD's jurisdiction. The analysis and evaluation undertaken by Air District staff is documented in the *Revised Draft Options and Justification Report – California Environmental Quality Act Thresholds of Significance* (Draft Options Report) (BAAQMD October 2009).

Air District staff hosted public workshops in February, April, September and October 2009, and April 2010 at several locations around the Bay Area. Air District staff also hosted additional workshops in each of the nine Bay Area counties specifically designed for, and to solicit input from, local agency staff. In addition, Air District staff met with regional stakeholder groups to discuss and receive input on the threshold options being evaluated. Throughout the course of the public workshops and stakeholder meetings Air District staff received many comments on the various options under consideration. Based on comments received and additional staff analysis, the threshold options and staff-recommended thresholds were further refined. The culmination of this nearly year and a half-long effort was presented in the Proposed Thresholds of Significance Report published on November 2, 2009 as the Air District staff's proposed air quality thresholds of significance.

The Air District Board of Directors (Board) held public hearings on November 18 and December 2, 2009 and January 6, 2010, to receive comments on staff's Proposed Thresholds of Significance (November 2, 2009; revised December 7, 2009). After public testimony and Board deliberations, the Board requested staff to present additional options for risk and hazard thresholds for Board consideration. This Report includes risks and hazards threshold options, as requested by the Board, in addition to staff's previously recommended thresholds of significance. The thresholds presented herein, adopted by the Air District Board of Directors, are intended to replace all of the Air District's currently recommended thresholds. The air quality thresholds of significance, and Board-requested risk and hazard threshold options, are provided in Table 1 at the end of this introduction.

1.1. BAAQMD/CEQA REGULATORY AUTHORITY

The BAAQMD has direct and indirect regulatory authority over sources of air pollution in the San Francisco Bay Area Air Basin (SFBAAB). CEQA requires that public agencies consider the potential adverse environmental impacts of any project that a public agency proposes to carry out, fund or approve. CEQA requires that a lead agency prepare an Environmental Impact Report (EIR) whenever it can be fairly argued (the "fair argument" standard), based on substantial evidence,[7] that a project may have a significant effect[8] on the environment, even if there is

[7] "Substantial evidence" includes facts, reasonable assumptions predicated upon facts, or expert opinions supported by facts, but does not include argument, speculation, unsubstantiated opinion or narrative, evidence that is clearly inaccurate

substantial evidence to the contrary (CEQA Guidelines §15064). CEQA requires that the lead agency review not only a project's direct effects on the environment, but also the cumulative impacts of a project and other projects causing related impacts. When the incremental effect of a project is cumulatively considerable, the lead agency must discuss the cumulative impacts in an EIR. (CEQA Guidelines §15064).

The "fair argument" standard refers to whether a fair argument can be made that a project may have a significant effect on the environment (*No Oil, Inc. v. City of Los Angeles* (1974) 13 Cal.3d 68, 84). The fair argument standard is generally considered a low threshold requirement for preparation of an EIR. The legal standards reflect a preference for requiring preparation of an EIR and for "resolving doubts in favor of environmental review." *Meija v. City of Los Angeles* (2005) 130 Cal. App. 4th 322, 332. "The determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the public agency involved, based to the extent possible on scientific and factual data." (CEQA Guidelines §15064(b).

In determining whether a project may have a significant effect on the environment, CEQA Guidelines Section 15064.7 provides that lead agencies may adopt and/or apply "thresholds of significance." A threshold of significance is "an identifiable quantitative, qualitative or performance level of a particular environmental effect, non-compliance with which means the effect will normally be determined to be significant by the agency and compliance with which means the effect normally will be determined to be less than significant" (CEQA Guidelines §15064.7).

While thresholds of significance give rise to a presumption of insignificance, thresholds are not conclusive, and do not excuse a public agency of the duty to consider evidence that a significant effect may occur under the fair argument standard. *Meija*, 130 Cal. App. 4th at 342. "A public agency cannot apply a threshold of significance or regulatory standard 'in a way that forecloses the consideration of any other substantial evidence showing there may be a significant effect.'" *Id.* This means that if a public agency is presented with factual information or other substantial evidence establishing a fair argument that a project may have a significant effect on the environment, the agency must prepare an EIR to study those impacts even if the project's impacts fall below the applicable threshold of significance.

Thresholds of significance must be supported by substantial evidence. This Report provides the substantial evidence in support of the thresholds of significance developed by the BAAQMD. If adopted by the BAAQMD Board of Directors, the Air District will recommend that lead agencies within the nine counties of the BAAQMD's jurisdiction use the thresholds of significance in this Report when considering the air quality impacts of projects under their consideration.

1.2. JUSTIFICATION FOR UPDATING CEQA THRESHOLDS

Any analysis of environmental impacts under CEQA includes an assessment of the nature and extent of each impact expected to result from the project to determine whether the impact will be treated as significant or less than significant. CEQA gives lead agencies discretion whether to classify a particular environmental impact as significant. Ultimately, formulation of a standard of significance requires the lead agency to make a policy judgment about where the line should be drawn distinguishing adverse impacts it considers significant from those that are not deemed significant. This judgment must, however, be based on scientific information and other factual data to the extent possible (CEQA Guidelines §15064(b)).

or erroneous, or evidence of social or economic impacts that do not contribute to, or are not caused by, physical impacts on the environment. Cal. Pub. Res. C. §21080(c); *see also* CEQA Guidelines §15384.

[8] A "significant effect" on the environment is defined as a "substantial, or potentially substantial, adverse change in the environment." Cal. Pub. Res. C. §21068; *see also* CEQA Guidelines §15382.

In the sense that advances in science provide new or refined factual data, combined with advances in technology and the gradual improvement or degradation of an environmental resource, the point where an environmental effect is considered significant is fluid over time. Other factors influencing this fluidity include new or revised regulations and standards, and emerging, new areas of concern.

In the ten years since BAAQMD last reviewed its recommended CEQA thresholds of significance for air quality, there have been tremendous changes that affect the quality and management of the air resources in the Bay Area. Traditional criteria air pollutant ambient air quality standards, at both the state and federal levels, have become increasingly more stringent. A new criteria air pollutant standard for fine particulate matter less than 2.5 microns in diameter ($PM_{2.5}$) has been added to federal and state ambient air quality standards. We have found, through technical advances in impact assessment, that toxic air contaminants are not only worse than previously thought from a health perspective, but that certain communities experience high levels of toxic air contaminants, giving rise to new regulations and programs to reduce the significantly elevated levels of ambient toxic air contaminant concentrations in the Bay Area.

In response to the elevated levels of toxic air contaminants in some Bay Area communities, the Air District created the Community Air Risk Evaluation (CARE) Program. Phase 1 of the BAAQMD's CARE program compiled and analyzed a regional emissions inventory of toxic air contaminants (TACs), including emissions from stationary sources, area sources, and on-road and off-road mobile sources. Phase 2 of the CARE Program conducted regional computer modeling of selected TAC species, species which collectively posed the greatest risk to Bay Area residents. In both Phases 1 and 2, demographic data were combined with estimates of TAC emissions or concentrations to identify communities that are disproportionally impacted from high concentrations of TACs. Bay Area Public Health Officers, in discussions with Air District staff and in comments to the Air District's Advisory Council (February 11, 2009, Advisory Council Meeting on Air Quality and Public Health), have recommended that $PM_{2.5}$, in addition to TACs, be considered in assessments of community-scale impacts of air pollution.

Another significant issue that affects the quality of life for Bay Area residents is the growing concern with global climate change. In just the past few years, estimates of the global atmospheric temperature and greenhouse gas concentration limits needed to stabilize climate change have been adjusted downward and the impacts of greenhouse gas emissions considered more dire. Previous scientific assessments assumed that limiting global temperature rise to 2-3°C above pre-industrial levels would stabilize greenhouse gas concentrations in the range of 450-550 parts per million (ppm) of carbon dioxide-equivalent (CO_2e). Now the science indicates that a temperature rise of 2°C would not prevent dangerous interference with the climate system. Recent scientific assessments suggest that global temperature rise should be kept below 2°C by stabilizing greenhouse gas concentrations below 350 ppm CO_2e, a significant reduction from the current level of 385 ppm CO_2e.

For the reasons stated above, and to further the goals of other District programs such as encouraging transit-oriented and infill development, BAAQMD has undertaken an effort to review all of its currently-recommended CEQA thresholds, revise them as appropriate, and develop new thresholds where appropriate. The overall goal of this effort is to develop CEQA significance criteria that ensure new development implements appropriate and feasible emission reduction measures to mitigate significant air quality impacts. The Air District's recommended CEQA significance thresholds have been vetted through a public review process and will be presented to the BAAQMD Board of Directors for adoption.

Table D-2 – Air Quality CEQA Thresholds of Significance			
Pollutant	**Construction-Related**	**Operational-Related**	
Project-Level			
Criteria Air Pollutants and Precursors (Regional)	**Average Daily Emissions (lb/day)**	**Average Daily Emissions (lb/day)**	**Maximum Annual Emissions (tpy)**
ROG	54	54	10
NO_X	54	54	10
PM_{10}	82 (exhaust only)	82	15
$PM_{2.5}$	54 (exhaust only)	54	10
$PM_{10}/PM_{2.5}$ (fugitive dust)	Best Management Practices	None	
Local CO	None	9.0 ppm (8-hour average), 20.0 ppm (1-hour average)	
GHGs **Projects other than Stationary Sources**	None	Compliance with Qualified Greenhouse Gas Reduction Strategy OR 1,100 MT of CO_2e/yr OR 4.6 MT CO_2e/SP/yr (residents + employees)	
GHGs **Stationary Sources**	None	10,000 MT/yr	
Risks and Hazards – New Source (All Areas) (Individual Project) **Staff Proposal**	Same as Operational Thresholds*	Compliance with Qualified Community Risk Reduction Plan OR Increased cancer risk of >10.0 in a million Increased non-cancer risk of > 1.0 Hazard Index (Chronic or Acute) Ambient $PM_{2.5}$ increase: > 0.3 µg/m^3 annual average Zone of Influence: 1,000-foot radius from fence line of source or receptor	

Table D-2 – Air Quality CEQA Thresholds of Significance		
Pollutant	**Construction-Related**	**Operational-Related**
Risks and Hazards – New Receptor (All Areas) (Individual Project) **Staff Proposal**	Same as Operational Thresholds*	Compliance with Qualified Community Risk Reduction Plan OR Increased cancer risk of >10.0 in a million Increased non-cancer risk of > 1.0 Hazard Index (Chronic or Acute) Ambient $PM_{2.5}$ increase: > 0.3 µg/m^3 annual average Zone of Influence: 1,000-foot radius from fence line of source or receptor
Risks and Hazards (Individual Project) **Tiered Thresholds Option**	Same as Operational Thresholds*	**Impacted Communities:** Siting a New Source Compliance with Qualified Community Risk Reduction Plan OR Increased cancer risk of >5.0 in a million Increased non-cancer risk of > 1.0 Hazard Index (Chronic or Acute) Ambient $PM_{2.5}$ increase: > 0.2 µg/m^3 annual average Zone of Influence: 1,000-foot radius from fence line of source or receptor
Risks and Hazards (Individual Project) **Tiered Thresholds Option** (Continued)	Same as Operational Thresholds*	**Impacted Communities:** Siting a New Receptor **All Other Areas:** Siting a New Source or Receptor Compliance with Qualified Community Risk Reduction Plan OR Increased cancer risk of >10.0 in a million Increased non-cancer risk of > 1.0 Hazard Index (Chronic or Acute) Ambient $PM_{2.5}$ increase: > 0.3 µg/m^3 annual average Zone of Influence: 1,000-foot radius from fence line of source or receptor

Table D-2 – Air Quality CEQA Thresholds of Significance		
Pollutant	**Construction-Related**	**Operational-Related**
Risks and Hazards – New Source (All Areas) (Cumulative Thresholds)	Same as Operational Thresholds*	Compliance with Qualified Community Risk Reduction Plan OR Cancer: > 100 in a million (from all local sources) Non-cancer: > 10.0 Hazard Index (from all local sources) (Chronic) $PM_{2.5}$: > 0.8 µg/m^3 annual average (from all local sources) Zone of Influence: 1,000-foot radius from fence line of source or receptor
Risks and Hazards – New Receptor (All Areas) (Cumulative Thresholds)	Same as Operational Thresholds*	Compliance with Qualified Community Risk Reduction Plan OR Cancer: > 100 in a million (from all local sources) Non-cancer: > 10.0 Hazard Index (from all local sources) (Chronic) $PM_{2.5}$: > 0.8 µg/m^3 annual average (from all local sources) Zone of Influence: 1,000-foot radius from fence line of source or receptor
Accidental Release of Acutely Hazardous Air Pollutants	None	Storage or use of acutely hazardous materials locating near receptors or receptors locating near stored or used acutely hazardous materials considered significant
Odors	None	Complaint History—Five confirmed complaints per year averaged over three years
Plan-Level		
Criteria Air Pollutants and Precursors	None	1. Consistency with Current Air Quality Plan control measures 2. Projected VMT or vehicle trip increase is less than or equal to projected population increase

Table D-2 – Air Quality CEQA Thresholds of Significance		
Pollutant	**Construction-Related**	**Operational-Related**
GHGs	None	Compliance with Qualified Greenhouse Gas Reduction Strategy (or similar criteria included in a General Plan) OR 6.6 MT CO2e/ SP/yr (residents + employees)
Risks and Hazards	None	1. Overlay zones around existing and planned sources of TACs (including adopted Risk Reduction Plan areas) 2. Overlay zones of at least 500 feet (or Air District-approved modeled distance) from all freeways and high volume roadways
Odors	None	Identify the location of existing and planned sources of odors
Accidental Release of Acutely Hazardous Air Pollutants	None	None
Regional Plans (Transportation and Air Quality Plans)		
GHGs, Criteria Air Pollutants and Precursors, and Toxic Air Contaminants	None	No net increase in emissions

Notes: CO = carbon monoxide; CO_2e = carbon dioxide equivalent; GHGs = greenhouse gases; lb/day = pounds per day; MT = metric tons; NO_X = oxides of nitrogen; $PM_{2.5}$= fine particulate matter with an aerodynamic resistance diameter of 2.5 micrometers or less; PM_{10} = respirable particulate matter with an aerodynamic resistance diameter of 10 micrometers or less; ppm = parts per million; ROG = reactive organic gases; SO_2 = sulfur dioxide; SP = service population; TACs = toxic air contaminants; TBP = toxic best practices; tons/day = tons per day; tpy = tons per year; yr= year.

* Note: The Air District recommends that for construction projects that are less than one year duration, Lead Agencies should annualize impacts over the scope of actual days that peak impacts are to occur, rather than the full year.

2. GREENHOUSE GAS THRESHOLDS

BAAQMD does not currently have an adopted threshold of significance for GHG emissions. BAAQMD currently recommends that lead agencies quantify GHG emissions resulting from new development and apply all feasible mitigation measures to lessen the potentially significant adverse impacts. One of the primary objectives in updating the current CEQA Guidelines is to identify a GHG significance threshold, analytical methodologies, and mitigation measures to ensure new land use development meets its fair share of the emission reductions needed to address the cumulative environmental impact from GHG emissions. GHG emissions contribute, on a cumulative basis, to the significant adverse environmental impacts of global climate change. As reviewed herein, climate change impacts include an increase in extreme heat days, higher ambient concentrations of air pollutants, sea level rise, impacts to water supply and water quality, public health impacts, impacts to ecosystems, impacts to agriculture, and other environmental

impacts. No single land use project could generate enough GHG emissions to noticeably change the global average temperature. The combination of GHG emissions from past, present, and future projects contribute substantially to the phenomenon of global climate change and its associated environmental impacts.

2.1. THRESHOLDS OF SIGNIFICANCE

Project Type	Thresholds
Projects other than Stationary Sources	Compliance with Qualified Greenhouse Gas Reduction Strategy OR 1,100 MT of CO_2e/yr OR 4.6 MT CO_2e/SP/yr (residents + employees)
Stationary Sources	10,000 MT of CO_2e/yr
Plans	Compliance with Qualified Greenhouse Gas Reduction Strategy (or similar criteria included in a General Plan) OR 6.6 MT CO_2e/SP/yr (residents + employees)
Regional Plans (Transportation and Air Quality Plans)	No net increase in GHG emissions

2.2. JUSTIFICATION AND SUBSTANTIAL EVIDENCE SUPPORTING THRESHOLDS

BAAQMD's approach to developing a threshold of significance for GHG emissions is to identify the emissions level for which a project would not be expected to substantially conflict with existing California legislation adopted to reduce statewide GHG emissions. If a project would generate GHG emissions above the threshold level, it would be considered to contribute substantially to a cumulative impact, and would be considered significant. If mitigation can be applied to lessen the emissions such that the project meets its share of emission reductions needed to address the cumulative impact, the project would normally be considered less than significant.

As explained in the District's *Revised Draft Options and Justifications Report* (BAAQMD 2009), there are several types of thresholds that may be supported by substantial evidence and be consistent with existing California legislation and policy to reduce statewide GHG emissions. In determining which thresholds to recommend, Staff studied numerous options, relying on reasonable, environmentally conservative assumptions on growth in the land use sector, predicted emissions reductions from statewide regulatory measures and resulting emissions inventories, and the efficacies of GHG mitigation measures. The thresholds recommended herein were chosen based on the substantial evidence that such thresholds represent quantitative and/or qualitative levels of GHG emissions, compliance with which means that the environmental impact of the GHG emissions will normally not be cumulatively considerable under CEQA. Compliance with such thresholds will be part of the solution to the cumulative GHG emissions problem, rather than hinder the state's ability to meet its goals of reduced statewide GHG emissions. Staff notes that it does not believe there is only one threshold for GHG emissions that can be supported by substantial evidence.

GHG CEQA significance thresholds recommended herein are intended to serve as interim levels during the implementation of the AB 32 Scoping Plan and SB 375, which will occur over time. Until AB 32 has been fully implemented in terms of adopted regulations, incentives, and programs and until SB 375 required plans have been fully adopted, or the California Air Resources Board (ARB) adopts a recommended threshold, the BAAQMD recommends that local agencies in the Bay Area apply the GHG thresholds recommended herein.

If left unchecked, GHG emissions from new land use development in California will result in a cumulatively considerable amount of GHG emissions and a substantial conflict with the State's ability to meet the goals within AB 32. Thus, BAAQMD proposes to adopt interim GHG thresholds for CEQA analysis, which can be used by lead agencies within the Bay Area. This would help lead agencies navigate this dynamic regulatory and technological environment where the field of analysis has remained wide open and inconsistent. BAAQMD's framework for developing a GHG threshold for land development projects that is based on policy and substantial evidence follows.

2.2.1. Scientific and Regulatory Justification

Climate Science Overview

Prominent GHGs contributing to the greenhouse effect are carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), hydrofluorocarbons, chlorofluorocarbons, and sulfur hexafluoride. Human-caused emissions of these GHGs in excess of natural ambient concentrations are responsible for intensifying the greenhouse effect and have led to a trend of unnatural warming of the earth's climate, known as global climate change or global warming. It is *extremely unlikely* that global climate change of the past 50 years can be explained without the contribution from human activities (IPCC 2007a).

According to Article 2 of the United Nations Framework Convention on Climate Change (UNFCCC), "Avoiding Dangerous Climate Change" means: *"stabilization of greenhouse gas concentrations in the atmosphere at a level that would prevent dangerous anthropogenic interference with the climate system."* Dangerous climate change defined in the UNFCCC is based on several key indicators including the potential for severe degradation of coral reef systems, disintegration of the West Antarctic Ice Sheet, and shut down of the large-scale, salinity- and thermally-driven circulation of the oceans. (UNFCCC 2009). The global atmospheric concentration of carbon dioxide has increased from a pre-industrial value of about 280 ppm to 379 ppm in 2005 (IPCC 2007a). "Avoiding dangerous climate change" is generally understood to be achieved by stabilizing global average temperatures between 2 and 2.4°C above pre-industrial levels. In order to limit temperature increases to this level, ambient global CO_2 concentrations must stabilize between 350 and 400 ppm (IPCC 2007b).

Executive Order S-3-05

Executive Order S-3-05, which was signed by Governor Schwarzenegger in 2005, proclaims that California is vulnerable to the impacts of climate change. It declares that increased temperatures could reduce the Sierra's snowpack, further exacerbate California's air quality problems, and potentially cause a rise in sea levels. To combat those concerns, the Executive Order established total GHG emission targets. Specifically, emissions are to be reduced to the 2000 level by 2010, the 1990 level by 2020, and to 80 percent below the 1990 level by 2050.

Assembly Bill 32, the California Global Warming Solutions Act of 2006

In September 2006, Governor Arnold Schwarzenegger signed Assembly Bill 32, the California Global Warming Solutions Act of 2006, which set the 2020 greenhouse gas emissions reduction goal into law. AB 32 finds and declares that "Global warming poses a serious threat to the economic well-being, public health, natural resources, and the environment of California." AB 32 requires that statewide GHG emissions be reduced to 1990 levels by 2020, and establishes

regulatory, reporting, voluntary, and market mechanisms to achieve quantifiable reductions in GHG emissions to meet the statewide goal.

In December of 2008, ARB adopted its *Climate Change Scoping Plan* (*Scoping Plan*), which is the State's plan to achieve GHG reductions in California, as required by AB 32 (ARB 2008). The Scoping Plan contains strategies California will implement to achieve a reduction of 169 MMT CO_2e emissions, or approximately 28 percent from the state's projected 2020 emission level of 596 MMT of CO_2e under a business-as-usual scenario (this is a reduction of 42 MMT of CO_2e, or almost 10 percent, from 2002-2004 average emissions), so that the state can return to 1990 emission levels, as required by AB 32.

While the Scoping Plan establishes the policy intent to control numerous GHG sources through regulatory, incentive, and market means, given the early phase of implementation and the level of control that local CEQA lead agencies have over numerous GHG sources, CEQA is an important and supporting tool in achieving GHG reductions overall in compliance with AB 32. In this spirit, BAAQMD is considering the adoption of thresholds of significance for GHG emissions for stationary source and land use development projects.

Senate Bill 375

Senate Bill (SB) 375, signed in September 2008, aligns regional transportation planning efforts, regional GHG reduction targets, and land use and housing allocation. SB 375 requires Metropolitan Planning Organizations (MPOs) to adopt a Sustainable Communities Strategy (SCS) or Alternative Planning Strategy (APS), which will prescribe land use allocation in that MPO's Regional Transportation Plan (RTP). ARB, in consultation with MPOs, will provide each affected region with reduction targets for GHGs emitted by passenger cars and light trucks in the region for the years 2020 and 2035. These reduction targets will be updated every eight years, but can be updated every four years if advancements in emission technologies affect the reduction strategies to achieve the targets. ARB is also charged with reviewing each MPO's SCS or APS for consistency with its assigned targets. If MPOs do not meet the GHG reduction targets, transportation projects would not be eligible for State funding programmed after January 1, 2012. New provisions of CEQA incentivize qualified projects that are consistent with an approved SCS or APS, categorized as "transit priority projects."

The revised District CEQA Guidelines includes methodology consistent with the recently updated State CEQA Guidelines, which provides that certain residential and mixed use projects, and transit priority projects consistent with an applicable SCS or APS need not analyze GHG impacts from cars and light duty trucks (CEQA Guidelines §15183.5(c)).

2.2.2. Project-Level GHG Thresholds

Staff recommends setting GHG significance thresholds based on AB 32 GHG emission reduction goals while taking into consideration emission reduction strategies outlined in ARB's Scoping Plan. Staff proposes two quantitative thresholds for land use projects: a bright line threshold based on a "gap" analysis and an efficiency threshold based on emission levels required to be met in order to achieve AB 32 goals.

Staff also proposes one qualitative threshold for land use projects: if a project complies with a Qualified Greenhouse Gas Reduction Strategy (as defined in Section 2.3.4 below) that addresses the project it would be considered less than significant. As explained in detail in Section 2.3.4 below, compliance with a Qualified Greenhouse Gas Reduction Strategy (or similar adopted policies, ordinances and programs), would provide the evidentiary basis for making CEQA findings that development consistent with the plan would result in feasible, measureable, and verifiable GHG reductions consistent with broad state goals such that projects approved under

qualified Greenhouse Gas Reduction Strategies or equivalent demonstrations would achieve their fair share of GHG emission reductions.

Land Use Projects "Gap-Based" Threshold

Staff took eight steps in developing this threshold approach, which are summarized here and detailed in the sections that follow. It should be noted that the "gap-based approach" used for threshold development is a conservative approach that focuses on a limited set of state mandates that appear to have the greatest potential to reduce land use development-related GHG emissions at the time of this writing. It is also important to note that over time, as the effectiveness of the State's implementation of AB 32 (and SB 375) progresses, BAAQMD will need to reconsider the extent of GHG reductions needed over and above those from the implementation thereof for the discretionary approval of land use development projects. Although there is an inherent amount of uncertainty in the estimated capture rates (i.e., frequency at which project-generated emissions would exceed a threshold and would be subject to mitigation under CEQA) and the aggregate emission reductions used in the gap analysis, they are based on BAAQMD's expertise, the best available data, and use conservative assumptions for the amount of emission reductions from legislation in derivation of the gap (e.g., only adopted legislation was relied upon). This approach is intended to attribute an appropriate share of GHG emission reductions necessary to reach AB 32 goals to new land use development projects in BAAQMD's jurisdiction that are evaluated pursuant to CEQA.

Step 1 Estimate from ARB's statewide GHG emissions inventory the growth in emissions between 1990 and 2020 attributable to "land use-driven" sectors of the emission inventory as defined by OPR's guidance document (*CEQA and Climate Change*). Land use-driven emission sectors include Transportation (On-Road Passenger Vehicles; On-Road Heavy Duty), Electric Power (Electricity; Cogeneration), Commercial and Residential (Residential Fuel Use; Commercial Fuel Use) and Recycling and Waste (Domestic Waste Water Treatment).

Result:1990 GHG emissions were 295.53 MMT CO_2e/yr and projected 2020 business-as-usual GHG emissions would be 400.22 MMT CO_2e/yr; thus a 26.2 percent reduction from statewide land use-driven GHG emissions would be necessary to meet the AB 32 goal of returning to 1990 emission levels by 2020. (See Table 2)

Step 2 Estimate the anticipated GHG emission reductions affecting the same land use-driven emissions inventory sectors associated with adopted statewide regulations identified in the AB 32 Scoping Plan.

Result: Estimated a 23.9 percent reduction can be expected in the land use-driven GHG emissions inventory from adopted Scoping Plan regulations, including AB 1493 (Pavley), LCFS, Heavy/Medium Duty Efficiency, Passenger Vehicle Efficiency, Energy-Efficiency Measures, Renewable Portfolio Standard, and Solar Roofs. (See Table 3)

Step 3 Determine any short fall or "gap" between the 2020 statewide emission inventory estimates and the anticipated emission reductions from adopted Scoping Plan regulations. This "gap" represents additional GHG emission reductions needed statewide from the land use-driven emissions inventory sectors, which represents new land use development's share of the emission reductions needed to meet statewide GHG emission reduction goals.

Result: With the 23.9 percent reductions from AB 32 Scoping Measures, there is a "gap" of 2.3 percent in necessary additional GHG emissions reductions to meet AB 32

goals of a 26.2 percent reduction from statewide land use-driven GHG emissions to return to 1990 levels in 2020. (See Table 2)

Step 4 Determine the percent reduction this "gap" represents in the "land use-driven" emissions inventory sectors from BAAQMD's 2020 GHG emissions inventory. Identify the mass of emission reductions needed in the SFBAAB from land use-driven emissions inventory sectors.

Result: Estimated that a 2.3 percent reduction in BAAQMD's projected 2020 emissions projections requires emissions reductions of 1.6 MMT CO_2e/yr from the land use-driven sectors. (See Table 4)

Step 5 Assess BAAQMD's historical CEQA database (2001-2008) to determine the frequency distribution trend of project sizes and types that have been subject to CEQA over the past several years.

Result: Determined historical patterns of residential, commercial and industrial development by ranges of average sizes of each development type. Results were used in Step 6 below to distribute anticipated Bay Area growth among different future project types and sizes.

Step 6 Forecast new land use development for the Bay Area using DOF/EDD population and employment projections and distribute the anticipated growth into appropriate land use types and sizes needed to accommodate the anticipated growth (based on the trend analysis in Step 5 above). Translate the land use development projections into land use categories consistent with those contained in the Urban Emissions Model (URBEMIS).

Result: Based on population and employment projections and the trend analysis from Step 5 above, forecasted approximately 4,000 new development projects, averaging about 400 projects per year through 2020 in the Bay Area.

Step 7 Estimate the amount of GHG emissions from each land use development project type and size using URBEMIS and post-model manual calculation methods (for emissions not included in URBEMIS). Determine the amount of GHG emissions that can reasonably and feasibly be reduced through currently available mitigation measures ("mitigation effectiveness") for future land use development projects subject to CEQA (based on land use development projections and frequency distribution from Step 6 above).

Result: Based on the information available and on sample URBEMIS calculations, found that mitigation effectiveness of between 25 and 30 percent is feasible.

Step 8 Conduct a sensitivity analysis of the numeric GHG mass emissions threshold needed to achieve the desired emissions reduction (i.e., "gap") determined in Step 4. This mass emission GHG threshold is that which would be needed to achieve the emission reductions necessary by 2020 to meet the Bay Area's share of the statewide "gap" needed from the land use-driven emissions inventory sectors.

Result: The results of the sensitivity analysis conducted in Step 8 found that reductions between about 125,000 MT/yr (an aggregate of 1.3 MMT in 2020) and over 200,000 MT/yr (an aggregate of over 2.0 MMT in 2020) were achievable and feasible. A mass emissions threshold of 1,100 MT of CO_2e/yr would result in approximately 59 percent of all projects being above the significance threshold (e.g., this is approximately the operational GHG emissions that would be associated with a 60 residential unit

subdivision) and must implement feasible mitigation measures to meet CEQA requirements. With an estimated 26 percent mitigation effectiveness, the 1,100 MT threshold would achieve 1.6 MMT CO_2e/yr in GHG emissions reductions.

Detailed Basis and Analysis

Derivation of Greenhouse Gas Reduction Goal

To meet the target emissions limit established in AB 32 (equivalent to levels in 1990), total GHG emissions would need to be reduced by approximately 28 percent from projected 2020 forecasts (ARB 2009a). The AB 32 Scoping Plan is ARB's plan for meeting this mandate (ARB 2008). While the Scoping Plan does not specifically identify GHG emission reductions from the CEQA process for meeting AB 32 derived emission limits, the scoping plan acknowledges that "other strategies to mitigate climate change . . . should also be explored." The Scoping Plan also acknowledges that "Some of the measures in the plan may deliver more emission reductions than we expect; others less . . . and new ideas and strategies will emerge." In addition, climate change is considered a significant environmental issue and, therefore, warrants consideration under CEQA. SB 97 represents the State Legislature's confirmation of this fact, and it directed the Governor's Office of Planning and Research (OPR) to develop CEQA Guidelines for evaluation of GHG emissions impacts and recommend mitigation strategies. In response, OPR released the *Technical Advisory: CEQA and Climate Change* (OPR 2008), and proposed revisions to the State CEQA guidelines (April 14, 2009) for consideration of GHG emissions. The California Natural Resources Agency adopted the proposed State CEQA Guidelines revisions on December 30, 2009 and the revisions were effective beginning March 18, 2010. It is known that new land use development must also do its fair share toward achieving AB 32 goals (or, at a minimum, should not hinder the State's progress toward the mandated emission reductions).

Foreseeable Scoping Plan Measures Emission Reductions and Remaining "Gap"

Step 1 of the Gap Analysis entailed estimating from ARB's statewide GHG inventory the growth in emissions between 1990 and 2020 attributable to land use driven sectors of the emissions inventory. As stated above, to meet the requirements set forth in AB 32 (i.e., achieve California's 1990-equivalent GHG emissions levels by 2020) California would need to achieve an approximate 28 percent reduction in emissions across all sectors of the GHG emissions inventory compared with 2020 projections. However, to meet the AB 32 reduction goals in the emissions sectors that are related to land use development (e.g., on-road passenger and heavy-duty motor vehicles, commercial and residential area sources [i.e., natural gas], electricity generation/consumption, wastewater treatment, and water distribution/consumption), staff determined that California would need to achieve an approximate 26 percent reduction in GHG emissions from these land use-driven sectors (ARB 2009a) by 2020 to return to 1990 land use emission levels.

Next, in Step 2 of the Gap Analysis, Staff determined the GHG emission reductions within the land use-driven sectors that are anticipated to occur from implementation of the Scoping Plan measures statewide, which are summarized in Table 2 and described below. Since the GHG emission reductions anticipated with the Scoping Plan were not accounted for in ARB's or BAAQMD's 2020 GHG emissions inventory forecasts (i.e., business as usual), an adjustment was made to include (i.e., give credit for) GHG emission reductions associated with key Scoping Plans measures, such as the Renewable Portfolio Standard, improvements in energy efficiency through periodic updates to Title 24, AB 1493 (Pavley) (which recently received a federal waiver to allow it to be enacted in law), the Low Carbon Fuel Standard (LCFS), and other measures. With reductions from these State regulations (Scoping Plan measures) taken into consideration and accounting for an estimated 23.9 percent reduction in GHG emissions, in Step 3 of the Gap Analysis Staff determined that the Bay Area would still need to achieve an additional 2.3 percent reduction from projected 2020 GHG emissions to meet the 1990 GHG emissions goal from the

land-use driven sectors. This necessary 2.3 percent reduction in projected GHG emissions from the land use sector is the "gap" the Bay Area needs to fill to do its share to meet the AB 32 goals. Refer to the following explanation and Tables 2 through 4 for data used in this analysis.

Because the transportation sector is the largest emissions sector of the state's GHG emissions inventory, it is aggressively targeted in early actions and other priority actions in the Scoping Plan including measures concerning gas mileage (Pavley), fuel carbon intensity (LCFS) and vehicle efficiency measures.

Table D-3 – California 1990, 2002-2004, and 2020 Land Use Sector GHG[1] (MMT CO_2e/yr)

Sector	1990 Emissions	2002-2004 Average	2020 BAU Emissions Projections	% of 2020 Total
Transportation	**137.98**	**168.66**	**209.06**	**52%**
On-Road Passenger Vehicles	108.95	133.95	160.78	40%
On-Road Heavy Duty	29.03	34.69	48.28	12%
Electric Power	**110.63**	**110.04**	**140.24**	**35%**
Electricity	95.39	88.97	107.40	27%
Cogeneration[2]	15.24	21.07	32.84	8%
Commercial and Residential	**44.09**	**40.96**	**46.79**	**12%**
Residential Fuel Use	29.66	28.52	32.10	8%
Commercial Fuel Use	14.43	12.45	14.63	4%
Recycling and Waste[1]	**2.83**	**3.39**	**4.19**	**1%**
Domestic Wastewater Treatment	2.83	3.39	4.19	1%
TOTAL GROSS EMISSIONS	**295.53**	**323.05**	**400.22**	
% Reduction Goal from Statewide land use driven sectors (from 2020 levels to reach 1990 levels in these emission inventory sectors)			26.2%	
% Reduction from AB32 Scoping Plan measures applied to land use sectors (see Table 3)			-23.9%	
% Reduction needed statewide beyond Scoping Plan measures (Gap)			2.3%	

Notes: MMT CO_2e /yr = million metric tons of carbon dioxide equivalent emissions per year.

[1] Landfills not included. See text.

[2] Cogeneration included due to many different applications for electricity, in some cases provides substantial power for grid use, and because electricity use served by cogeneration is often amenable to efficiency requirements of local land use authorities.

Sources: Data compiled by EDAW and ICF Jones & Stokes from ARB data.

Pavley Regulations. The AB 32 Scoping Plan assigns an approximate 20 percent reduction in emissions from passenger vehicles associated with the implementation of AB 1493. The AB 32 Scoping Plan also notes that "AB 32 specifically states that if the Pavley regulations do not remain in effect, ARB shall implement alternative regulations to control mobile sources to achieve

equivalent or greater reductions of greenhouse gas emissions (HSC §38590)." Thus, it is reasonable to assume full implementation of AB 1493 standards, or equivalent programs that would be implemented by ARB. Furthermore, on April 1, 2010, U.S. EPA and the Department of Transportation's National Highway Safety Administration (NHTSA) announced a joint final rule establishing a national program that will dramatically reduce greenhouse gas emissions and improve fuel economy for new cars and trucks sold in the United States after 2011. Under this national program, automobile manufacturers will be able to build a single light-duty national fleet that satisfies all requirements under both the national program and the standards of California and other states. Nonetheless, BAAQMD may need to revisit this methodology as the federal standards come on line to ensure that vehicle standards are as aggressive as contemplated in development of this threshold.

Table D-4 – 2020 Land Use Sector GHG Emission Reductions from State Regulations and AB 32 Measures

Affected Emissions Source	California Legislation	% Reduction from 2020 GHG inventory	End Use Sector (% of Bay Area LU Inventory)	Scaled % Emissions Reduction (credit)
Mobile	AB 1493 (Pavley)	19.7%	On road passenger/light truck transportation (45%)	8.9%
	LCFS	7.2%	On road passenger/light truck transportation (45%)	3.2%
	LCFS	7.2%	On road Heavy/Medium Duty Transportation (5%)	0.4%
	Heavy/Medium Duty Efficiency	2.9%	On road Heavy/Medium Duty Transportation (5%)	0.2%
	Passenger Vehicle Efficiency	2.8%	On road passenger/light truck transportation (45%)	1.3%
Area	Energy-Efficiency Measures	9.5%	Natural gas (Residential, 10%)	1.0%
			Natural gas (Non-residential, 13%)	1.2%
Indirect	Renewable Portfolio Standard	21.0%	Electricity (excluding cogen) (17%)	3.5%
	Energy-Efficiency Measures	15.7%	Electricity (26%)	4.0%
	Solar Roofs	1.5%	Electricity (excluding cogen) (17%)	0.2%
Total credits given to land use-driven emission inventory sectors from Scoping Plan measures				**23.9%**

Notes: AB = Assembly Bill; LCFS = Low Carbon Fuel Standard; SB = Senate Bill; RPS = Renewable Portfolio Standard
Please refer to Appendix D for detailed calculations. Sources: Data compiled by ICF Jones & Stokes.

LCFS. According to the adopted LCFS rule (CARB, April 2009), the LCFS is expected to result in approximately 10 percent reduction in the carbon intensity of transportation fuels. However, a

portion of the emission reductions required from the LCFS would be achieved over the life cycle of transportation fuel production rather than from mobile-source emission factors. Based on CARB's estimate of nearly 16 MMT reductions in on-road emissions from implementation of the LCFS and comparison to the statewide on-road emissions sector, the LCFS is assumed to result in a 7.2 percent reduction compared to 2020 BAU conditions (CARB 2009e).

Table D-5 – SFBAAB 1990, 2007, and 2020 Land Use Sector GHG Emissions Inventories and Projections (MMT CO_2e/yr)

Sector	1990 Emissions	2007 Emissions	2020 Emissions Projections	% of 2020 Total[2]
Transportation	**26.1**	**30.8**	**35.7**	**50%**
On-Road Passenger Vehicles	23.0	27.5	32.0	
On-Road Heavy Duty	3.1	3.3	3.7	
Electric Power	**25.1**	**15.2**	**18.2**	**26%**
Electricity	16.5	9.9	11.8	
Cogeneration	8.6	5.3	6.4	
Commercial and Residential	**8.9**	**15.0**	**16.8**	**24%**
Residential Fuel Use	5.8	7.0	7.5	
Commercial Fuel Use	3.1	8.0	9.3	
Recycling and Waste[1]	**0.2**	**0.4**	**0.4**	**1%**
Domestic Waste Water Treatment	0.2	0.4	0.4	
TOTAL GROSS EMISSIONS	**60.3**	**61.4**	**71.1**	
SFBAAB's "Fair Share" % Reduction (from 2020 levels to reach 1990 levels) with AB-32 Reductions (from Table 3)			2.3%	
SFBAAB's Equivalent Mass Emissions Land Use Reduction Target at 2020 (MMT CO2e/yr)			1.6	

Notes: MMT CO_2e /yr = million metric tons of carbon dioxide equivalent emissions per year; SFBAAB = San Francisco Bay Area Air Basin.
[1] Landfills not included.
[2] Percentages do not sum exactly to 100% in table due to rounding.
Please refer to Appendix D for detailed calculations.
Sources: Data compiled by EDAW 2009, ICF Jones & Stokes 2009, BAAQMD 2008.

Renewable Portfolio Standard, Energy Efficiency and Solar Roofs. Energy efficiency and renewable energy measures from the Scoping Plan were also included in the gap analysis. The Renewable Portfolio Standard (rules) will require the renewable energy portion of the retail electricity portfolio to be 33 percent in 2020. For PG&E, the dominant electricity provider in the Basin, approximately 12 percent of their current portfolio qualifies under the RPS rules and thus the gain by 2020 would be approximately 21 percent. The Scoping Plan also estimates that energy efficiency gains with periodic improvement in building and appliance energy standards and incentives will reach 10 to 15 percent for natural gas and electricity respectively. The final

state measure included in this gap analysis is the solar roof initiative, which is estimated to result in reduction of the overall electricity inventory of 1.5 percent.

Landfill emissions are excluded from this analysis. While land use development does generate waste related to both construction and operations, the California Integrated Waste Management Board (CIWMB) has mandatory diversion requirements that will, in all probability, increase over time to promote waste reductions, reuse, and recycle. The Bay Area has relatively high levels of waste diversion and extensive recycling efforts. Further, ARB has established and proposes to increase methane capture requirements for all major landfills. Thus, at this time, landfill emissions associated with land use development waste generation is not included in the land use sector inventory used to develop this threshold approach.

Industrial stationary sources thresholds were developed separately from the land use threshold development using a market capture approach as described below. However, mobile source and area source emissions, as well as indirect electricity emissions that derive from industrial use are included in the land use inventory above as these particular activities fall within the influence of local land use authorities in terms of the affect on trip generation and energy efficiency.

AB 32 mandates reduction to 1990-equivalent GHG levels by 2020, with foreseeable emission reductions from State regulations and key Scoping Plan measures taken into account, were applied to the land use-driven emission sectors within the SFBAAB (i.e., those that are included in the quantification of emissions from a land use project pursuant to a CEQA analysis [on-road passenger vehicles, commercial and residential natural gas, commercial and residential electricity consumption, and domestic waste water treatment], as directed by OPR in the Technical Advisory: *Climate Change and CEQA* [OPR 2008]). This translates to a 2.3 percent gap in necessary GHG emission reductions by 2020 from these sectors.

Land Use Projects Bright Line Threshold

In Steps 4 and 5 of the gap analysis, Staff determined that applying a 2.3 percent reduction to these land use emissions sectors in the SFBAAB's GHG emissions inventory would result in an equivalent fair share of 1.6 million metric tons per year (MMT/yr) reductions in GHG emissions from new land use development. As additional regulations and legislation aimed at reducing GHG emissions from land use-related sectors become available in the future, the 1.6 MMT GHG emissions reduction goal may be revisited and recalculated by BAAQMD.

In order to derive the 1.6 MMT "gap," a projected development inventory for the next ten years in the SFBAAB was calculated (see Table 4 and *Revised Draft Options and Justifications Report* (BAAQMD 2009)). CO_2e emissions were modeled for projected development in the SFBAAB and compiled to estimate the associated GHG emissions inventory. The GHG (i.e., CO_2e) CEQA threshold level was adjusted for projected land use development that would occur within BAAQMD's jurisdiction over the period from 2010 through 2020.

Projects with emissions greater than the threshold would be required to mitigate to the threshold level or reduce project emissions by a percentage (mitigation effectiveness) deemed feasible by the Lead Agency under CEQA compared to a base year condition. The base year condition is defined by an equivalent size and character of project with annual emissions using the defaults in URBEMIS and the California Climate Action Registry's General Reporting Protocol for 2008. By this method, land use project mitigation subject to CEQA would help close the "gap" remaining after application of the key regulations and measures noted above supporting overall AB 32 goals.

This threshold takes into account Steps 1-8 of the gap analysis described above to arrive at a numerical mass emissions threshold. Various mass emissions significance threshold levels (i.e.,

bright lines) could be chosen based on the mitigation effectiveness and performance anticipated to be achieved per project to meet the aggregate emission reductions of 1.6 MMT needed in the SFBAAB by 2020(see Table 5 and *Revised Draft Options and Justifications Report* (BAAQMD 2009)). Staff recommends a 1,100 MT CO_2e per year threshold. Choosing a 1,100 MT mass emissions significance threshold level (equivalent to approximately 60 single-family units), would result in about 59 percent of all projects being above the significance threshold and having to implement feasible mitigation measures to meet their CEQA obligations. These projects account for approximately 92 percent of all GHG emissions anticipated to occur between now and 2020 from new land use development in the SFBAAB.

Project applicants and lead agencies could use readily available computer models to estimate a project's GHG emissions, based on project specific attributes, to determine if they are above or below the bright line numeric threshold. With this threshold, projects that are above the threshold level, after consideration of emission-reducing characteristics of the project as proposed, would have to reduce their emissions to below the threshold to be considered less than significant.

Establishing a "bright line" to determine the significance of a project's GHG emissions impact provides a level of certainty to lead agencies in determining if a project needs to reduce its GHG emissions through mitigation measures and when an EIR is required.

Table D-6 – Operational GHG Threshold Sensitivity Analysis

Option	Mitigation Effectiveness Assumptions		Mass Emission Threshold Level (MT CO_2e/yr)	% of Projects Captured (>threshold)	% of Emissions Captured (> threshold)	Emissions Reduction per year (MT/yr)	Aggregate Emissions Reduction (MMT) at 2020	Threshold Project Size Equivalent (single family dwelling units)
	Performance Standards Applied to All Projects with Emissions < Threshold Level	Mitigation Effectiveness Applied to Emissions > Threshold Level						
1A	N/A	30%	975	60%	93%	201,664	2.0	53
1A	N/A	25%	110	96%	100%	200,108	2.0	66
1A	N/A	30%	1,225	21%	67%	159,276	1.6	67
1A	N/A	26%	1,100	59%	92%	159,877	1.6	60
1A	N/A	30%	2,000	14%	61%	143,418	1.4	109
1A	N/A	25%	1,200	58%	92%	136,907	1.4	66
1A	N/A	30%	3,000	10%	56%	127,427	1.3	164
1A	N/A	25%	1,500	20%	67%	127,303	1.3	82
1B	26%	N/A	N/A	100%	100%	208,594	2.1	N/A[1]
1C	5%	30%	1,900	15%	62%	160,073	1.6	104
1C	10%	25%	1,250	21%	67%	159,555	1.6	68
1C	5%	30%	3,000	10%	56%	145,261	1.5	164
1C	10%	25%	2,000	4%	61%	151,410	1.5	109
1C	10%	30%	10,000	2%	33%	125,271	1.3	547

MMT = million metric tons per year; MT CO_2e/yr = metric tons of carbon dioxide equivalent emissions per year; MT/yr = metric tons per year; N/A = not applicable.

[1] Any project subject to CEQA would trigger this threshold.

Please refer to Appendix E for detailed calculations.

Source: Data modeled by ICF Jones & Stokes.

Land Use Projects Efficiency-Based Threshold

GHG efficiency metrics can also be utilized as thresholds to assess the GHG efficiency of a project on a per capita basis (residential only projects) or on a "service population" basis (the sum of the number of jobs and the number of residents provided by a project) such that the project will allow for consistency with the goals of AB 32 (i.e., 1990 GHG emissions levels by 2020). GHG efficiency thresholds can be determined by dividing the GHG emissions inventory goal (allowable emissions), by the estimated 2020 population and employment. This method allows highly efficient projects with higher mass emissions to meet the overall reduction goals of AB 32. Staff believes it is more appropriate to base the land use efficiency threshold on the service population metric for the land use-driven emission inventory. This approach is appropriate because the threshold can be applied evenly to all project types (residential or commercial/retail only and mixed use) and uses only the land use emissions inventory that is comprised of all land use projects. Staff will provide the methodology to calculate a project's GHG emissions in the revised CEQA Guidelines, such as allowing infill projects up to a 50 percent or more reduction in daily vehicle trips if the reduction can be supported by close proximity to transit and support services, or a traffic study prepared for the project.

Table D-7 – California 2020 GHG Emissions, Population Projections and GHG Efficiency Thresholds - Land Use Inventory Sectors

Land Use Sectors Greenhouse Gas Emissions Target	295,530,000
Population	44,135,923
Employment	20,194,661
California Service Population (Population + Employment)	64,330,584
AB 32 Goal GHG emissions (metric tons CO_2e)/SP[1]	**4.6**

Notes: AB = Assembly Bill; CO_2e = carbon dioxide equivalent; GHG = greenhouse gas; SP = service population.
[1] Greenhouse gas efficiency levels were calculated using only the "land use-related" sectors of ARB's emissions inventory.
Please refer to Appendix D for detailed calculations.
Sources: Data compiled by EDAW 2009, ARB 2009a, DOF 2009, EDD 2009, ICF Jones & Stokes 2009.

Staff proposes a project-level efficiency threshold of 4.6 MT CO_2e/SP, the derivation of which is shown Table 6. This efficiency-based threshold reflects very GHG-efficient projects. As stated previously and below, staff anticipates that significance thresholds (rebuttable presumptions of significance at the project level) will function on an interim basis only until adequate programmatic approaches are in place at the city, county, and regional level that will allow the CEQA streamlining of individual projects. (See State CEQA Guidelines §15183.5 ["Tiering and Streamlining the Analysis of Greenhouse Gas Emissions"]).

2.2.3. Plan-Level GHG Thresholds

Staff proposes using a two step process for determining the significance of proposed plans and plan amendments for GHG. As a first step in assessing plan-level impacts, Staff is proposing that agencies that have adopted a qualified Greenhouse Gas Reduction Strategy (or have incorporated similar criteria in their general plan) and the general plan is consistent with the Greenhouse Gas Reduction Strategy, the general plan would be considered less than significant. In addition, as discussed above for project-level GHG impacts, Staff is proposing an efficiency threshold to assess plan-level impacts. Staff believes a programmatic approach to limiting GHG emissions is appropriate at the plan-level. Thus, as projects consistent with the Greenhouse Gas

Reduction Strategy are proposed, they may be able to tier off the plan and its environmental analysis.

GHG Efficiency Metrics for Plans

For local land use plans, a GHG-efficiency metric (e.g., GHG emissions per unit) would enable comparison of a proposed general plan to its alternatives and to determine if the proposed general plan meets AB 32 emission reduction goals.

AB 32 identifies local governments as essential partners in achieving California's goal to reduce GHG emissions. Local governments have primary authority to plan, zone, approve, and permit how and where land is developed to accommodate population growth and the changing needs of their jurisdiction. ARB has developed the Local Government Operations Protocol and is developing a protocol to estimate community-wide GHG emissions. ARB encourages local governments to use these protocols to track progress in reducing GHG emissions. ARB encourages local governments to institutionalize the community's strategy for reducing its carbon footprint in its general plan. SB 375 creates a process for regional integration of land development patterns and transportation infrastructure planning with the primary goal of reducing GHG emissions from the largest sector of the GHG emission inventory, light duty vehicles.

If the statewide AB 32 GHG emissions reduction context is established, GHG efficiency can be viewed independently from the jurisdiction in which the plan is located. Expressing projected 2020 mass of emissions from land use-related emissions sectors by comparison to a demographic unit (e.g., population and employment) provides evaluation of the GHG efficiency of a project in terms of what emissions are allowable while meeting AB 32 targets.

Two approaches were considered for efficiency metrics. The "service population" (SP) approach would consider efficiency in terms of the GHG emissions compared to the sum of the number of jobs and the number of residents at a point in time. The per capita option would consider efficiency in terms of GHG emissions per resident only. Staff recommends that the efficiency threshold for plans be based on all emission inventory sectors because, unlike land use projects, general plans comprise more than just land use related emissions (e.g. industrial). Further, Staff recommends that the plan threshold be based on the service population metric as general plans include a mix of residents and employees. The Service Population metric would allow decision makers to compare GHG efficiency of general plan alternatives that vary residential and non-residential development totals, encouraging GHG efficiency through improving jobs/housing balance. This approach would not give preference to communities that accommodate more residential (population-driven) land uses than non-residential (employment driven) land uses which could occur with the per capita approach.

A SP-based GHG efficiency metric (see Table 7) was derived from the emission rates at the State level that would accommodate projected population and employment growth under trend forecast conditions, and the emission rates needed to accommodate growth while allowing for consistency with the goals of AB 32 (i.e., 1990 GHG emissions levels by 2020).

Table D-8 – California 2020 GHG Emissions, Population Projections and GHG Efficiency Thresholds - All Inventory Sectors

All Inventory Sectors Greenhouse Gas Emissions Target	426,500,000
Population	44,135,923
Employment	20,194,661
California Service Population (Population + Employment)	64,330,584

AB 32 Goal GHG emissions (metric tons CO_2e)/SP[1]	**6.6**

Notes: AB = Assembly Bill; CO_2e = carbon dioxide equivalent; GHG = greenhouse gas; SP = service population.

[1] Greenhouse gas efficiency levels were calculated using only the "land use-related" sectors of ARB's emissions inventory.

Please refer to Appendix D for detailed calculations.

Sources: Data compiled by EDAW 2009, ARB 2009a, DOF 2009, EDD 2009, ICF Jones & Stokes 2009.

If a general plan demonstrates, through dividing the emissions inventory projections (MT CO_2e) by the amount of growth that would be accommodated in 2020, that it could meet the GHG efficiency metrics in this section (6.6 MT CO_2e/SP from all emission sectors, as noted in Table 7), then the amount of GHG emissions associated with the general plan would be considered less than significant, regardless of its size (and magnitude of GHG emissions). In other words, the general plan would accommodate growth in a manner that would not hinder the State's ability to achieve AB 32 goals, and thus, would be less than significant for GHG emissions and their contribution to climate change. The efficiency metric would not penalize well-planned communities that propose a large amount of development. Instead, the SP-based GHG efficiency metric acts to encourage the types of development that BAAQMD and OPR support (i.e., infill and transit-oriented development) because it tends to reduce GHG and other air pollutant emissions overall, rather than discourage large developments for being accompanied by a large mass of GHG emissions. Plans that are more GHG efficient would have no or limited mitigation requirements to help them complete the CEQA process more readily than plans that promote GHG inefficiencies, which will require detailed design of mitigation during the CEQA process and could subject a plan to potential challenge as to whether all feasible mitigation was identified and adopted. This type of threshold can shed light on a well-planned general plan that accommodates a large amount of growth in a GHG-efficient way.

When analyzing long-range plans, such as general plans, it is important to note that the planning horizon will often surpass the 2020 timeframe for implementation of AB 32. Executive Order S-3-05 establishes a more aggressive emissions reduction goal for the year 2050 of 80 percent below 1990 emissions levels. The year 2020 should be viewed as a milestone year, and the general plan should not preclude the community from a trajectory toward the 2050 goal. However, the 2020 timeframe is examined in this threshold evaluation because doing so for the 2050 timeframe (with respect to population, employment, and GHG emissions projections) would be too speculative. Advances in technology and policy decisions at the state level will be needed to meet the aggressive 2050 goals. It is beyond the scope of the analysis tools available at this time to examine reasonable emissions reductions that can be achieved through CEQA analysis in the year 2050. As the 2020 timeframe draws nearer, BAAQMD will need to reevaluate the threshold to better represent progress toward 2050 goals.

2.2.4. Greenhouse Gas Reduction Strategies

Finally, many local agencies have already undergone or plan to undergo efforts to create general or other plans that are consistent with AB 32 goals. The Air District encourages such planning efforts and recognizes that careful upfront planning by local agencies is invaluable to achieving the state's GHG reduction goals. If a project is consistent with an adopted Qualified Greenhouse Gas Reduction Strategy that addresses the project's GHG emissions, it can be presumed that the project will not have significant GHG emission impacts. This approach is consistent with CEQA Guidelines Sections 15064(h)(3) and 15183.5(b), which provides that a "lead agency may determine that a project's incremental contribution to a cumulative effect is not cumulatively considerable if the project will comply with the requirements in a previously approved plan or

mitigation program which provides specific requirements that will avoid or substantially lessen the cumulative problem."

A qualified Greenhouse Gas Reduction Strategy (or similar adopted policies, ordinances and programs) is one that is consistent with all of the AB 32 Scoping Plan measures and goals. The Greenhouse Gas Reduction Strategy should identify a land use design, transportation network, goals, policies and implementation measures that would achieve AB 32 goals. Strategies with horizon years beyond 2020 should consider continuing the downward reduction path set by AB 32 and move toward climate stabilization goals established in Executive Order S-3-05.

Qualified Greenhouse Gas Reduction Strategy
A qualified Greenhouse Gas Reduction Strategy adopted by a local jurisdiction should include the following elements as described in the State CEQA Guidelines Section 15183.5. The District's revised CEQA Guidelines provides the methodology to determine if a Greenhouse Gas Reduction Strategy meets these requirements.

(A) Quantify greenhouse gas emissions, both existing and projected over a specified time period, resulting from activities within a defined geographic area;

(B) Establish a level, based on substantial evidence, below which the contribution to greenhouse gas emissions from activities covered by the plan would not be cumulatively considerable;

(C) Identify and analyze the greenhouse gas emissions resulting from specific actions or categories of actions anticipated within the geographic area;

(D) Specify measures or a group of measures, including performance standards, that substantial evidence demonstrates, if implemented on a project-by-project basis, would collectively achieve the specified emissions level;

(E) Establish a mechanism to monitor the plan's progress toward achieving the level and to require amendment if the plan is not achieving specified levels;

(F) Be adopted in a public process following environmental review.

Local Climate Action Policies, Ordinances and Programs
Air District staff recognizes that many communities in the Bay Area have been proactive in planning for climate change but have not yet developed a stand-alone Greenhouse Gas Reduction Strategy that meets the above criteria. Many cities and counties have adopted climate action policies, ordinances and program that may in fact achieve the goals of AB 32 and a qualified Greenhouse Gas Reduction Strategy. Staff recommends that if a local jurisdiction can demonstrate that its collective set of climate action policies, ordinances and other programs is consistent with AB 32 and State CEQA Guidelines Section 15183.5, includes requirements or feasible measures to reduce GHG emissions and achieves one of the following GHG emission reduction goals,[9] the AB 32 consistency demonstration should be considered equivalent to a qualified Greenhouse Gas Reduction Strategy:

- 1990 GHG emission levels,
- 15 percent below 2008 emission levels, or

[9] Lead agencies using consistency with their jurisdiction's climate action policies, ordinances and programs as a measure of significance under CEQA Guidelines section 15064(h)(3) and 15183.5(b) should ensure that the policies, ordinances and programs satisfy all of the requirements of that subsection before relying on them in a CEQA analysis.

- Meet the plan efficiency threshold of 6.6 MT CO_2e/service population/year.

Qualified Greenhouse Gas Reduction Strategies that are tied to the AB 32 reduction goals would promote reductions on a plan level without impeding the implementation of GHG-efficient development, and would recognize the initiative of many Bay Area communities who have already developed or are in the process of developing a GHG reduction plan. The details required above for a qualified Greenhouse Gas Reduction Strategy (or similar adopted policies, ordinances and programs) would provide the evidentiary basis for making CEQA findings that development consistent with the plan would result in feasible, measureable, and verifiable GHG reductions consistent with broad state goals such that projects approved under qualified Greenhouse Gas Reduction Strategies or equivalent demonstrations would achieve their fair share of GHG emission reductions.

GHG Thresholds for Regional Plans

Regional plans include the Regional Transportation Plan prepared by the Metropolitan Transportation Commission (MTC) and air quality plans prepared by the Air District.

The Regional Transportation Plan (RTP), also called a Metropolitan Transportation Plan (MTP) or Long-Range Transportation Plan is the mechanism used in California by both Metropolitan Planning Organizations (MPOs) and Regional Transportation Planning Agencies (RTPAs) to conduct long-range (minimum of 20 years) planning in their regions. MTC functions as both the regional transportation planning agency, a state designation, and, for federal purposes, as the region's metropolitan planning organization (MPO). As such, it is responsible for regularly updating the Regional Transportation Plan, a comprehensive blueprint for the development of the Bay Area's transportation system that includes mass transit, highway, airport, seaport, railroad, bicycle and pedestrian facilities. The performance of this system affects such public policy concerns as air quality, environmental resource consumption, social equity, "smart growth," economic development, safety, and security. Transportation planning recognizes the critical links between transportation and other societal goals. The planning process requires developing strategies for operating, managing, maintaining, and financing the area's transportation system in such a way as to advance the area's long-term goals.

The Air District periodically prepares and updates plans to achieve the goal of healthy air. Typically, a plan will analyze emissions inventories (estimates of current and future emissions from industry, motor vehicles, and other sources) and combine that information with air monitoring data (used to assess progress in improving air quality) and computer modeling simulations to test future strategies to reduce emissions in order to achieve air quality standards. Air quality plans usually include measures to reduce air pollutant emissions from industrial facilities, commercial processes, motor vehicles, and other sources. Bay Area air quality plans are prepared with the cooperation of MTC, the Association of Bay Area Governments (ABAG) and the Bay Conservation and Development Commission (BCDC).

The threshold of significance for regional plans is no net increase in emissions including greenhouse gas emissions. This threshold serves to answer the State CEQA Guidelines Appendix G sample question: "Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?"

2.2.5. Stationary Source GHG Threshold

Staff's recommended threshold for stationary source GHG emissions is based on estimating the GHG emissions from combustion sources for all permit applications submitted to the Air District in 2005, 2006 and 2007. The analysis is based only on CO_2 emissions from stationary sources, as that would cover the vast majority of the GHG emissions due to stationary combustion sources in

the SFBAAB. The estimated CO_2 emissions were calculated for the maximum permitted amount, i.e. emissions that would be emitted if the sources applying for a permit application operate at maximum permitted load and for the total permitted hours. All fuel types are included in the estimates. For boilers burning natural gas, diesel fuel is excluded since it is backup fuel and is used only if natural gas is not available. Emission values are estimated before any offsets (i.e., Emission Reduction Credits) are applied. GHG emissions from mobile sources, electricity use and water delivery associated with the operation of the permitted sources are not included in the estimates.

It is projected that a threshold level of 10,000 metric tons of CO_2e per year would capture approximately 95 percent of all GHG emissions from new permit applications from stationary sources in the SFBAAB. That threshold level was calculated as an average of the combined CO_2 emissions from all stationary source permit applications submitted to the Air District during the three year analysis period.

Staff recommends this 10,000 MT of CO_2/yr as it would address a broad range of combustion sources and thus provide for a greater amount of GHG reductions to be captured and mitigated through the CEQA process. As documented in the Scoping Plan, in order to achieve statewide reduction targets, emissions reductions need to be obtained through a broad range of sources throughout the California economy and this threshold would achieve this purpose. While this threshold would capture 95 percent of the GHG emissions from new permit applications, the threshold would do so by capturing only the large, significant projects. Permit applications with emissions above the 10,000 MT of CO_2/yr threshold account for less than 10 percent of stationary source permit applications which represent 95 percent of GHG emissions from new permits analyzed during the three year analysis period.

This threshold would be considered an interim threshold and Air District staff will reevaluate the threshold as AB 32 Scoping Plan measures such as cap and trade are more fully developed and implemented at the state level.

2.2.6. Summary of Justification for GHG Thresholds

The bright-line numeric threshold of 1,100 MT CO_2e/yr is a numeric emissions level below which a project's contribution to global climate change would be less than "cumulatively considerable." This emissions rate is equivalent to a project size of approximately 60 single-family dwelling units, and approximately 59 percent of all future projects and 92 percent of all emissions from future projects would exceed this level. For projects that are above this bright-line cutoff level, emissions from these projects would still be less than cumulatively significant if the project as a whole would result in an efficiency of 4.6 MT CO_2e per service population or better for mixed-use projects. Projects with emissions above 1,100 MT CO_2e/yr would therefore still be less than significant if they achieved project efficiencies below these levels. If projects as proposed exceed these levels, they would be required to implement mitigation measures to bring them back below the 1,100 MT CO_2e/yr bright-line cutoff or within the 4.6 MT CO_2e Service Population efficiency threshold. If mitigation did not bring a project back within the threshold requirements, the project would be cumulatively significant and could be approved only with a Statement of Overriding Considerations and a showing that all feasible mitigation measures have been implemented. Projects' GHG emissions would also be less than significant if they comply with a Qualified Greenhouse Gas Reduction Strategy.

As explained in the preceding analyses of these thresholds, the greenhouse gas emissions from land use projects expected between now and 2020 built in compliance with these thresholds would be approximately 26 percent below BAU 2020 conditions and thus would be consistent with achieving an AB 32 equivalent reduction. The 26 percent reduction from BAU 2020 from new

projects built in conformance with these thresholds would achieve an aggregate reduction of approximately 1.6 MMT CO_2e/yr, which is the level of emission reductions from new Bay Area land use sources needed to meet the AB 32 goals, per ARB's Scoping Plan as discussed above.

Projects with greenhouse gas emissions in conformance with these thresholds would therefore not be considered significant for purposes of CEQA. Although the emissions from such projects would add an incremental amount to the overall greenhouse gas emissions that cause global climate change impacts, emissions from projects consistent with these thresholds would not be a "cumulatively considerable" contribution under CEQA. Such projects would not be "cumulatively considerable" because they would be helping to solve the cumulative problem as a part of the AB 32 process.

California's response to the problem of global climate change is to reduce greenhouse gas emissions to 1990 levels by 2020 under AB 32 as a near-term measure and ultimately to 80 percent below 1990 levels by 2050 as the long-term solution to stabilizing greenhouse gas concentrations in the atmosphere at a level that will not cause unacceptable climate change impacts. To implement this solution, the Air Resources Board has adopted a Scoping Plan and budgeted emissions reductions that will be needed from all sectors of society in order to reach the interim 2020 target.

The land-use sector in the Bay Area needs to achieve aggregate emission reductions of approximately 1.6 MMT CO_2e/yr from new projects between now and 2020 to achieve this goal, as noted above, and each individual new project will need to achieve its own respective portion of this amount in order for the Bay Area land use sector as a whole to achieve its allocated emissions target. Building all of the new projects expected in the Bay Area between now and 2020 in accordance with the thresholds that District staff are proposing will achieve the overall appropriate share for the land use sector, and building each individual project in accordance with the thresholds will achieve that individual project's respective portion of the emission reductions needed to implement the AB 32 solution. For these reasons, projects built in conformance with the thresholds will be part of the solution to the cumulative problem, and not part of the continuing problem. They will allow the Bay Area's land use sector to achieve the emission reductions necessary from that sector for California to implement its solution to the cumulative problem of global climate change. As such, even though such projects will add an incremental amount of greenhouse gas emissions, their incremental contribution will be less than "cumulatively considerable" because they are helping to achieve the cumulative solution, not hindering it. Such projects will therefore not be "significant" for purposes of CEQA (see CEQA Guidelines §15064(h)(1)).

The conclusion that land use projects that comply with these thresholds is also supported by CEQA Guidelines Section 15030(a)(3), which provides that a project's contribution to a cumulative problem can be less that cumulatively considerable "if the project is required to implement or fund its fair share of a mitigation measure or measures designed to alleviate the cumulative impact." In the case of greenhouse gas emissions associated with land use projects, achieving the amount of emission reductions below BAU that will be required to achieve the AB 32 goals is the project's "fair share" of the overall emission reductions needed under ARB's scoping plan to reach the overall statewide AB 32 emissions levels for 2020. If a project is designed to implement greenhouse gas mitigation measures that achieve a level of reductions consistent with what is required from all new land use projects to achieve the land use sector "budget" – *i.e.*, keeping overall project emissions below 1,100 MT CO_2e/yr or ensuring that project efficiency is better than 4.6 MT CO_2e/service population – then it will be implementing its share of the mitigation measures necessary to alleviate the cumulative impact, as shown in the analyses set forth above.

It is also worth noting that this "fair share" approach is flexible and will allow a project's significance to be determined by how well it is designed from a greenhouse gas efficiency standpoint, and not just by the project's size. For example, a large high-density infill project located in an urban core nearby to public transit and other alternative transportation options, and built using state-of-the-art energy efficiency methods and improvements such as solar panels, as well as all other feasible mitigation measures, would not become significant for greenhouse gas purposes (and thus require a Statement of Overriding Considerations in order to be approved) simply because it happened to be a large project. Projects such as this hypothetical development with low greenhouse gas emissions per service population are what California will need in the future in order to do its part in achieving a solution to the problem of global climate change. The determination of significance under CEQA should therefore take these factors into account, and the significance thresholds would achieve this important policy goal. In all, land use sector projects that comply with the GHG thresholds would not be "cumulatively considerable" because they would be helping to solve the cumulative problem as a part of the AB 32 process.

Likewise, new Air District permit applications for stationary sources that comply with the quantitative threshold of 10,000 MT CO_2e/yr would not be "cumulatively considerable" because they also would not hinder the state's ability to solve the cumulative greenhouse gas emissions problem pursuant to AB 32. Unlike the land use sector, the AB 32 Scoping Plan measures, including the cap-and-trade program, provide for necessary emissions reductions from the stationary source sector to achieve AB 32 2020 goals.

While stationary source projects will need to comply with the cap-and-trade program once it is enacted and reduce their emissions accordingly, the program will be phased in over time starting in 2012 and at first will only apply to the very largest sources of GHG emissions. In the mean time, certain stationary source projects, particularly those with large GHG emissions, still will have a cumulatively considerable impact on climate change. The 10,000 MT CO_2e/yr threshold will capture 95 percent of the stationary source sector GHG emissions in the Bay Area. The five percent of emissions that are from stationary source projects below the 10,000 MT CO_2e/yr threshold account for a small portion of the Bay Area's total GHG emissions from stationary sources and these emissions come from very small projects. Such small stationary source projects will not significantly add to the global problem of climate change, and they will not hinder the Bay Area's ability to reach the AB 32 goal in any significant way, even when considered cumulatively. In Air District's staff's judgment, the potential environmental benefits from requiring EIRs and mitigation for these projects would be insignificant. In all, based on staff's expertise, stationary source projects with emissions below 10,000 MT CO_2e/yr will not provide a cumulatively considerable contribution to the cumulative impact of climate change.

3. COMMUNITY RISK AND HAZARD THRESHOLDS

To address community risk from air toxics, the Air District initiated the Community Air Risk Evaluation (CARE) program in 2004 to identify locations with high levels of risk from ambient toxic air contaminants (TAC) co-located with sensitive populations and use the information to help focus mitigation measures. Through the CARE program, the Air District developed an inventory of TAC emissions for 2005 and compiled demographic and heath indicator data. According to the findings of the CARE Program, diesel PM—mostly from on and off-road mobile sources—accounts for over 80 percent of the inhalation cancer risk from TACs in the Bay Area (BAAQMD 2006).

The Air District applied a regional air quality model using the 2005 emission inventory data to estimate excess cancer risk from ambient concentrations of important TAC species, including diesel PM, 1,3-butadiene, benzene, formaldehyde and acetaldehyde. The highest cancer risk

levels from ambient TAC in the Bay Area tend to occur in the core urban areas, along major roadways and adjacent to freeways and port activity. Cancer risks in areas along these major freeways are estimated to range from 200 to over 500 excess cases in a million for a lifetime of exposure. Priority communities within the Bay Area – defined as having higher emitting sources, highest air concentrations, and nearby low income and sensitive populations – include the urban core areas of Concord, eastern San Francisco, western Alameda County, Redwood City/East Palo Alto, Richmond/San Pablo, and San Jose.

Fifty percent of BAAQMD's population was estimated to have an ambient background inhalation cancer risk of less than 500 cases in one million, based on emission levels in 2005. Table 8 presents a summary of percentages of the population exposed to varying levels of cancer risk from ambient TACs. Approximately two percent of the SFBAAB population is exposed to background risk levels of less than 200 excess cases in one million. This is in contrast to the upper percentile ranges where eight percent of the SFBAAB population is exposed to background risk levels of greater than 1,000 excess cases per one million. To identify and reduce risks from TAC, this chapter presents thresholds of significance for both cancer risk and non-cancer health hazards.

Table D-9 – Statistical Summary of Estimated Population-Weighted Ambient Cancer Risk in 2005

Percentage of Population (Percent below level of ambient risk)	Ambient Cancer Risk (inhalation cancer cases in one million)
92	1,000
90	900
83	800
77	700
63	600
50	500
32	400
13	300
2	200
<1	100

Source: Data compiled by EDAW 2009.

Many scientific studies have linked fine particulate matter and traffic-related air pollution to respiratory illness (Hiltermann et al. 1997, Schikowski et al 2005, Vineis et al. 2007) and premature mortality (Dockery 1993, Pope et al. 1995, Jerrett et al. 2005). Traffic-related air pollution is a complex mix of chemical compounds (Schauer et al. 2006), often spatially correlated with other stressors, such as noise and poverty (Wheeler and Ben-Shlomo 2005). While such correlations can be difficult to disentangle, strong evidence for adverse health effects of fine particulate matter ($PM_{2.5}$) has been developed for regulatory applications in a study by the U.S, EPA. This study found that a 10 percent increase in $PM_{2.5}$ concentrations increased the non-injury death rate by 10 percent (U.S. EPA 2006).

Public Health Officers for four counties in the San Francisco Bay Area in 2009 provided testimony to the Air District's Advisory Council (February 11, 2009, Advisory Council Meeting on Air Quality

and Public Health). Among the recommendations made, was that $PM_{2.5}$, in addition to TACs, be considered in assessments of community-scale impacts of air pollution. In consideration of the scientific studies and recommendations by the Bay Area Health Directors, it is apparent that, in addition to the significance thresholds for local-scale TAC, thresholds of significance are required for near-source, local-scale concentrations of $PM_{2.5}$.

3.1. THRESHOLDS OF SIGNIFICANCE

The thresholds of significance and Board-requested options are presented in this section:

- The **Staff Proposal** includes thresholds for cancer risk, non-cancer health hazards, and fine particulate matter.
- **Tiered Thresholds Option** includes tiered thresholds for new sources in impacted communities. Thresholds for receptors and cumulative impacts are the same as the Staff Proposal.

Proposal/Option	Construction-Related	Operational-Related
Project-Level – Individual Project		
Risks and Hazards – New Source (All Areas) (Individual Project) **Staff Proposal**	Same as Operational Thresholds*	Compliance with Qualified Community Risk Reduction Plan OR Increased cancer risk of >10.0 in a million Increased non-cancer risk of > 1.0 Hazard Index (Chronic or Acute) Ambient $PM_{2.5}$ increase: > 0.3 µg/m^3 annual average Zone of Influence: 1,000-foot radius from fence line of source or receptor
Risks and Hazards – New Receptor (All Areas) (Individual Project) **Staff Proposal**	Same as Operational Thresholds*	Compliance with Qualified Community Risk Reduction Plan OR Increased cancer risk of >10.0 in a million Increased non-cancer risk of > 1.0 Hazard Index (Chronic or Acute) Ambient $PM_{2.5}$ increase: > 0.3 µg/m^3 annual average Zone of Influence: 1,000-foot radius from fence line of source or receptor

Proposal/Option	Construction-Related	Operational-Related
Risks and Hazards (Individual Project) **Tiered Thresholds Option**	Same as Operational Thresholds*	**Impacted Communities:** Siting a New Source Compliance with Qualified Community Risk Reduction Plan OR Increased cancer risk of >5.0 in a million Increased non-cancer risk of > 1.0 Hazard Index (Chronic or Acute) Ambient $PM_{2.5}$ increase: > 0.2 µg/m^3 annual average Zone of Influence: 1,000-foot radius from fence line of source or receptor
	Same as Operational Thresholds*	**Impacted Communities:** Siting a New Receptor **All Other Areas:** Siting a New Source or Receptor Compliance with Qualified Community Risk Reduction Plan OR Increased cancer risk of >10.0 in a million Increased non-cancer risk of > 1.0 Hazard Index (Chronic or Acute) Ambient $PM_{2.5}$ increase: > 0.3 µg/m^3 annual average Zone of Influence: 1,000-foot radius from fence line of source or receptor
Accidental Release of Acutely Hazardous Air Pollutants	None	Storage or use of acutely hazardous materials locating near receptors or receptors locating near stored or used acutely hazardous materials considered significant
Project-Level – Cumulative		

Proposal/Option	Construction-Related	Operational-Related
Risks and Hazards – New Source (All Areas) (Cumulative Thresholds)	Same as Operational Thresholds*	Compliance with Qualified Community Risk Reduction Plan OR Cancer: > 100 in a million (from all local sources) Non-cancer: > 10.0 Hazard Index (from all local sources) (Chronic) $PM_{2.5}$: > 0.8 µg/m^3 annual average (from all local sources) Zone of Influence: 1,000-foot radius from fence line of source or receptor
Risks and Hazards – New Receptor (All Areas) (Cumulative Thresholds)	Same as Operational Thresholds*	Compliance with Qualified Community Risk Reduction Plan OR Cancer: > 100 in a million (from all local sources) Non-cancer: > 10.0 Hazard Index (from all local sources) (Chronic) $PM_{2.5}$: > 0.8 µg/m^3 annual average (from all local sources) Zone of Influence: 1,000-foot radius from fence line of source or receptor
Plan-Level		
Risks and Hazards	None	1. Overlay zones around existing and planned sources of TACs (including adopted Risk Reduction Plan areas). 2. Overlay zones of at least 500 feet (or Air District-approved modeled distance) from all freeways and high volume roadways.
Accidental Release of Acutely Hazardous Air Pollutants	None	None
Regional Plans (Transportation and Air Quality Plans)		
Risks and Hazards	None	No net increase in toxic air contaminants

* Note: The Air District recommends that for construction projects that are less than one year duration, Lead Agencies should annualize impacts over the scope of actual days that peak impacts are to occur, rather than the full year.

3.2. JUSTIFICATION AND SUBSTANTIAL EVIDENCE SUPPORTING THRESHOLDS

The goal of the thresholds is to ensure that no source creates, or receptor endures, a significant adverse impact from any individual project, and that the total of all nearby directly emitted risk and hazard emissions is also not significantly adverse. The thresholds for local risks and hazards from TAC and $PM_{2.5}$ are intended to apply to all sources of emissions, including both permitted stationary sources and on- and off-road mobile sources, such as sources related to construction, busy roadways, or freight movement.

Thresholds for an individual new source are designed to ensure that the source does not contribute to a cumulatively significant impact. Cumulative thresholds for sources recognize that some areas are already near or at levels of significant impact. If within such an area there are receptors, or it can reasonably be foreseen that there will be receptors, then a cumulative significance threshold sets a level beyond which any additional risk is significant.

For new receptors – sensitive populations or the general public – thresholds of significance are designed to identify levels of contributed risk or hazards from existing local sources that pose a significant risk to the receptors. Single-source thresholds for receptors are provided to recognize that within the area defined there can be variations in risk levels that may be significant. Single-source thresholds assist in the identification of significant risks, hazards, or concentrations in a subarea, within the area defined by the selected radius. Cumulative thresholds for receptors are designed to account for the effects of all sources within the defined area.

Cumulative thresholds, for both sources and receptors, must consider the size of the source area, defined by a radius from the proposed project. To determine cumulative impacts from a prescribed zone of influence requires the use of modeling. The larger the radius, the greater the number of sources considered that may contribute to the modeled risk and, until the radius approaches a regional length scale, the greater the expected modeled risk increment. If the area of impact considered were grown to the scale of a city, the modeled risk increment would approach the risk level present in the ambient air.

3.2.1. Scientific and Regulatory Justification

Regulatory Framework for TACs

Prior to 1990, the Clean Air Act required EPA to list air toxics it deemed hazardous and to establish control standards which would restrict concentrations of hazardous air pollutants (HAP) to a level that would prevent any adverse effects “with an ample margin of safety.” By 1990, EPA had regulated only seven such pollutants and it was widely acknowledged by that time that the original Clean Air Act had failed to address toxic air emissions in any meaningful way. As a result, Congress changed the focus of regulation in 1990 from a risk-based approach to technology-based standards. Title III, Section 112(b) of the 1990 Clean Air Act Amendment established this new regulatory approach. Under this framework, prescribed pollution control technologies based upon maximum achievable control technology (MACT) were installed without the a priori estimation of the health or environmental risk associated with each individual source. The law listed 188 HAPs that would be subject to the MACT standards. EPA issued 53 standards for 89 different types of major industrial sources of air toxics and eight categories of smaller sources such as dry cleaners. These requirements took effect between 1996 and 2002. Under the federal Title V Air Operating Permit Program, a facility with the potential to emit 10 tons of any toxic air pollutant, or 25 tons per year of any combination of toxic air pollutants, is defined as a major source HAPs. Title V permits include requirements for these facilities to limit toxic air pollutant emissions.

Several state and local agencies adopted programs to address gaps in EPA's program prior to the overhaul of the national program in 1990. California's program to reduce exposure to air toxics was established in 1983 by the Toxic Air Contaminant Identification and Control Act (AB 1807, Tanner 1983) and the Air Toxics "Hot Spots" Information and Assessment Act (AB 2588, Connelly 1987). Under AB 1807, ARB and the Office of Environmental Health Hazard Assessment (OEHHA) determines if a substance should be formally identified as a toxic air contaminant (TAC) in California. OEHHA also establishes associated risk factors and safe concentrations of exposure.

AB 1807 was amended in 1993 by AB 2728, which required ARB to identify the 189 federal hazardous air pollutants as TACs. AB 2588 (Connelly, 1987) supplements the AB 1807 program, by requiring a statewide air toxics inventory, notification of people exposed to a significant health risk, and facility plans to reduce these risks. In September 1992, the "Hot Spots" Act was amended by Senate Bill 1731 which required facilities that pose a significant health risk to the community to reduce their risk through a risk management plan.

Cancer Risk

Cancer risk from TACs is typically expressed in numbers of excess cancer cases per million persons exposed over a defined period of exposure, for example, over an assumed 70 year lifetime. The Air District is not aware of any agency that has established an acceptable level of cancer risk for TACs. However, a range of what constitutes a significant increment of cancer risk from any compound has been established by the U.S. EPA. EPA's guidance for conducting air toxics analyses and making risk management decisions at the facility- and community-scale level considers a range of acceptable cancer risks from one in a million to one in ten thousand (100 in a million). The guidance considers an acceptable range of cancer risk increments to be from one in a million to one in ten thousand. In protecting public health with an ample margin of safety, EPA strives to provide maximum feasible protection against risks to health from HAPs by limiting additional risk to a level no higher than the one in ten thousand estimated risk that a person living near a source would be exposed to at the maximum pollutant concentrations for 70 years. This goal is described in the preamble to the benzene National Emissions Standards for Hazardous Air Pollutants (NESHAP) rulemaking (54 Federal Register 38044, September 14, 1989) and is incorporated by Congress for EPA's residual risk program under Clean Air Act section 112(f).

Regulation 2, Rule 5 of the Air District specifies permit requirements for new and modified stationary sources of TAC. The Project Risk Requirement (2-5-302.1) states that the Air Pollution Control Officer shall deny an Authority to Construct or Permit to Operate for any new or modified source of TACs if the project cancer risk exceeds 10.0 in one million.

Hazard Index for Non-cancer Health Effects

Non-cancer health hazards for chronic and acute diseases are expressed in terms of a hazard index (HI), a ratio of TAC concentration to a reference exposure level (REL), below which no adverse health effects are expected, even for sensitive individuals. As such, OEHHA has defined acceptable concentration levels, and also significant concentration increments, for compounds that pose non-cancer health hazards. If the HI for a compound is less than one, non-cancer chronic and acute health impacts have been determined to be less than significant.

State and Federal Ambient Air Quality Standards for $PM_{2.5}$

The Children's Environmental Health Protection Act (Senate Bill 25), passed by the California state legislature in 1999, requires ARB, in consultation with OEHHA, to "review all existing health-based ambient air quality standards to determine whether, based on public health, scientific literature and exposure pattern data, these standards adequately protect the public, including infants and children, with an adequate margin of safety." As a result of the review requirement, in 2002 ARB adopted an annual average California Ambient Air Quality Standard (CAAQS) for

$PM_{2.5}$ of 12 ug/m^3 that is not to be exceeded (California Code of Regulations, Title 17 § 70200, Table of Standards). The National Ambient Air Quality Standard (NAAQS) established an annual standard for $PM_{2.5}$ (15 ug/m^3) that is less stringent that the CAAQS, but also set a 24-hour average standard (35 ug/m^3), which is not included in the CAAQS (Code of Federal Regulations, Title 40, Part 50.7).

Significant Impact Levels for $PM_{2.5}$

EPA recently proposed and documented alternative options for $PM_{2.5}$ Significant Impact Levels (SILs) (Federal Register 40 CFR Parts 51 and 52, September 21, 2007). The EPA is proposing to facilitate implementation of a $PM_{2.5}$ Prevention of Significant Deterioration (PSD) program in areas attaining the $PM_{2.5}$ NAAQS by developing $PM_{2.5}$ increments, or SILs. These "increments" are maximum increases in ambient $PM_{2.5}$ concentrations ($PM_{2.5}$ increments) allowed in an area above the baseline concentration.

The SIL is a threshold that would be applied to individual facilities that apply for a permit to emit a regulated pollutant in an area that meets the NAAQS. The State and EPA must determine if emissions from that facility will cause the air quality to worsen. If an individual facility projects an increase in emissions that result in ambient impacts greater than the established SIL, the permit applicant would be required to perform additional analyses to determine if those impacts will be more than the amount of the PSD increment. This analysis would combine the impact of the proposed facility when added to all other sources in the area.

The EPA is proposing such values for $PM_{2.5}$ that will be used as screening tools by a major source subject to PSD to determine the subsequent level of analysis and data gathering required for a PSD permit application for emissions of $PM_{2.5}$. The SIL is one element of the EPA program to prevent deterioration in regional air quality and is utilized in the new source review (NSR) process. New source review is required under Section 165 of the Clean Air Act, whereby a permit applicant must demonstrate that emissions from the proposed construction and operation of a facility "will not cause, or contribute to, air pollution in excess of any maximum allowable increase or maximum allowable concentration for any pollutant." The purpose of the SIL is to provide a screening level that triggers further analysis in the permit application process.

For the purpose of NSR, SILs are set for three types of areas: Class I areas where especially clean air is most desirable, including national parks and wilderness areas; Class II areas where there is not expected to be substantial industrial growth; and Class III areas where the highest relative level of industrial development is expected. In Class II and Class III areas, a $PM_{2.5}$ concentration of 0.3, 0.8, and 1 µg/m^3 has been proposed as a SIL. To arrive at the SIL $PM_{2.5}$ option of 0.8 µg/m^3 , EPA scaled an established PM_{10} SILs of 1.0 µg/m^3 by the ratio of emissions of $PM_{2.5}$ to PM_{10} using the EPA's 1999 National Emissions Inventory. To arrive at the SIL option of 0.3 µg/m^3, EPA scaled the PM_{10} SIL of 1.0 µg/m^3 by the ratio of the current Federal ambient air quality standards for $PM_{2.5}$ and PM_{10} (15/50). These options represent what EPA currently considers as a range of appropriate SIL values.

EPA interprets the SIL to be the level of $PM_{2.5}$ increment that represents a "significant contribution" to regional non-attainment. While SIL options were not designed to be thresholds for assessing community risk and hazards, they are being considered to protect public health at a regional level by helping an area maintain the NAAQS. Furthermore, since it is the goal of the Air District to achieve and maintain the NAAQS and CAAQS at both regional and local scales, the SILs may be reasonably be considered as thresholds of significance under CEQA for local-scale increments of $PM_{2.5}$.

Roadway Proximity Health Studies

Several medical research studies have linked near-road pollution exposure to a variety of adverse health outcomes impacting children and adults. Kleinman et al. (2007) studied the potential of roadway particles to aggravate allergic and immune responses in mice. Using mice that were not inherently susceptible, the researchers placed these mice at various distances downwind of State Road 60 and Interstate 5 freeways in Los Angeles to test the effect these roadway particles have on their immune system. They found that within five meters of the roadway, there was a significant allergic response and elevated production of specific antibodies. At 150 meters (492 feet) and 500 meters (1,640 feet) downwind of the roadway, these effects were not statistically significant.

Another significant study (Ven Hee et al. 2009) conducted a survey involving 3,827 participants that aimed to determine the effect of residential traffic exposure on two preclinical indicators of heart failure; left ventricular mass index (LVMI), measured by the cardiac magnetic resonance imaging (MRI), and ejection fraction. The studies classified participants based on the distance between their residence and the nearest interstate highway, state or local highway, or major arterial road. Four distance groups were defined: less than 50 meters (165 feet), 50-100 meters, 101-150 meters, and greater than 150 meters. After adjusting for demographics, behavioral, and clinical covariates, the study found that living within 50 meters of a major roadway was associated with a 1.4 g/m^2 higher LVMI than living more than 150 meters from one. This suggests an association between traffic-related air pollution and increased prevalence of a preclinical predictor of heart failure among people living near roadways.

To quantify the roadway concentrations of $PM_{2.5}$ that contributed to the health impacts reported by Kleinman et al (2007), the Air District modeled the emissions and associated particulate matter concentrations for the roadways studied. To perform the modeling, emissions were estimated for Los Angeles using the EMFAC model and annual average vehicle traffic data taken from Caltrans was used in the roadway model (CAL3QHCR) to estimate the downwind $PM_{2.5}$ concentrations at 50 meters and 150 meters. Additionally, emissions were assumed to occur from 10:00 a.m. to 2:00 p.m. corresponding to the time in which the mice were exposed during the study. The results of the modeling indicate that at 150 meters, where no significant health effects were found, the downwind concentration of $PM_{2.5}$ was 0.78 $\mu g/m^3$, consistent with the proposed EPA SIL option of 0.8 $\mu g/m^3$.

Concentration-Response Function for $PM_{2.5}$

The U.S. EPA reevaluated the relative risk of premature death associated with $PM_{2.5}$ exposure and developed a new relative risk factor (U.S. EPA 2006). This expert elicitation was prepared in support of the characterization of uncertainty in EPA's benefits analyses associated with reductions in exposure to particulate matter pollution. As recommended by the National Academy of Sciences, EPA used expert judgment to better describe the uncertainties inherent in their benefits analysis. Twelve experts participated in the study and provided not just a point estimate of the health effects of PM2.5, but a probability distribution representing the range where they expected the true effect would be. Among the experts who directly incorporated their views on the likelihood of a causal relationship into their distributions, the central (median) estimates of the percent change in all-cause mortality in the adult U.S. population that would result from a permanent 1 µg/m3 drop in annual average PM2.5 concentrations ranged from 0.7 to 1.6 percent. The median of their estimates was 1.0 (% increase per 1 µg/m3 increase in PM2.5), with a 90% confidence interval of 0.3 to 2.0 (medians of their 5th and 95th percentiles, respectively) (BAAQMD 2010).Subsequent to the EPA elicitation, Schwartz et al. (2008) examined the linearity of the concentration-response function of $PM_{2.5}$-mortality and showed that the response function was linear, with health effects clearly continuing below the current U.S. standard of 15 $\mu g/m^3$, and that the effects of changes in exposure on mortality were seen within two years.

San Francisco Ordinance on Roadway Proximity Health Effects

In 2008, the City and County of San Francisco adopted an ordinance (San Francisco Health Code, Article 38 - Air Quality Assessment and Ventilation Requirement for Urban Infill Residential Development, Ord. 281-08, File No. 080934, December 5, 2008) requiring that public agencies in San Francisco take regulatory action to prevent future air quality health impacts from new sensitive uses proposed near busy roadways (SFDPH 2008). The regulation requires that developers screen sensitive use projects for proximity to traffic and calculate the concentration of $PM_{2.5}$ from traffic sources where traffic volumes suggest a potential hazard. If modeled levels of traffic-attributable $PM_{2.5}$ at a project site exceed an action level (currently set at 0.2 $\mu g/m^3$) developers would be required to incorporate ventilation systems to remove 80 percent of $PM_{2.5}$ from outdoor air. The regulation does not place any requirements on proposed sensitive uses if modeled air pollutant levels fall below the action threshold. This ordinance only considers impacts from on-road motor vehicles, not impacts related to construction equipment or stationary sources.

A report with supporting documentation for the ordinance (SFPHD 2008) provided a threshold to trigger action or mitigation of 0.2 $\mu g/m^3$ of $PM_{2.5}$ annual average exposure from roadway vehicles within a 150 meter (492 feet) maximum radius of a sensitive receptor. The report applied the concentration-response function from Jerrett et al. (2005) that attributed 14 percent increase in mortality to a 10 $\mu g/m^3$ increase in $PM_{2.5}$ to estimate an increase in non-injury mortality in San Francisco of about 21 excess deaths per million population per year from a 0.2 $\mu g/m^3$ increment of annual average $PM_{2.5}$.

Distance for Significant Impact

The distance used for the radius around the project boundary should reflect the zone or area over which sources may have a significant influence. For cumulative thresholds, for both sources and receptors, this distance also determines the size of the source area, defined. To determine cumulative impacts from a prescribed zone of influence requires the use of modeling. The larger the radius, the greater the number of sources considered that may contribute to the risk and the greater the expected modeled risk increment. If the area of impact considered were grown to approach the scale of a city, the modeled risk increment would approach the risk level present in the ambient air.

A summary of research findings in ARB's Land Use Compatibility Handbook (ARB 2005) indicates that traffic-related pollutants were higher than regional levels within approximately 1,000 feet downwind and that differences in health-related effects (such as asthma, bronchitis, reduced lung function, and increased medical visits) could be attributed in part to the proximity to heavy vehicle and truck traffic within 300 to 1,000 feet of receptors. In the same summary report, ARB recommended avoiding siting sensitive land uses within 1,000 feet of a distribution center and major rail yard, which supports the use of a 1,000 feet evaluation distance in case such sources may be relevant to a particular project setting. A 1,000 foot zone of influence is also supported by Health & Safety Code §42301.6 (Notice for Possible Source Near School).

Some studies have shown that the concentrations of particulate matter tend to be reduced substantially or can even be indistinguishable from upwind background concentrations at a distance 1,000 feet downwind from sources such as freeways or large distribution centers. Zhu et al. (2002) conducted a systematic ultrafine particle study near Interstate 710, one of the busiest freeways in the Los Angeles Basin. Particle number concentration and size distribution were measured as a function of distances upwind and downwind of the I-710 freeway. Approximately 25 percent of the 12,180 vehicles per hour are heavy duty diesel trucks based on video counts conducted as part of the research. Measurements were taken at 13 feet, 23 feet, 55 feet, 252 feet, 449 feet, and 941 feet downwind and 613 feet upwind from the edge of the freeway. The particle number and supporting measurements of carbon monoxide and black carbon decreased

exponentially and all constituents simultaneously tracked with each other as one moves away from the freeway. Ultrafine particle size distribution changed markedly and its number concentrations dropped dramatically with increasing distance. The study found that ultrafine particle concentrations measured 941 feet downwind of I-710 were indistinguishable from the upwind background concentration.

Impacted Communities

Starting in 2006, the Air District's CARE program developed gridded TAC emissions inventories and compiled demographic information that were used to identify communities that were particularly impacted by toxic air pollution for the purposes of distributing grant and incentive funding. In 2009, the District completed regional modeling of TAC on a one kilometer by one kilometer grid system. This modeling was used to estimate cancer risk and TAC population exposures for the entire District. The information derived from the modeling was then used to update and refine the identification of impacted communities. One kilometer modeling yielded estimates of annual concentrations of five key compounds – diesel particulate matter, benzene, 1,3-butadiene, formaldehyde, and acetaldehyde – for year 2005. These concentrations were multiplied by their respective unit cancer risk factors, as established by OEHHA, to estimate the expected excess cancer risk per million people from these compounds.

Sensitive populations from the 2000 U.S. Census database were identified as youth (under 18) and seniors (over 64) and mapped to the same one kilometer grid used for the toxics modeling. Excess cancers from TAC exposure were determined by multiplying these sensitive populations by the model-estimated excess risk to establish a data set representing sensitive populations with high TAC exposures. TAC emissions (year 2005) were mapped to the one kilometer grid and also scaled by their unit cancer risk factor to provide a data set representing source regions for TAC emissions. Block-group level household income data from the U.S. Census database were used to identify block groups with family incomes where more than 40 percent of the population was below 185 percent of the federal poverty level (FPL). Poverty-level polygons that intersect high (top 50 percent) exposure cells and are within one grid cell of a high emissions cell (top 25 percent) were used to identify impacted areas. Boundaries were constructed along major roads or highways that encompass nearby high emission cells and low income areas. This method identified the following six areas as priority communities: (1) portions of the City of Concord; (2) Western Contra Costa County (including portions of the Cities of Richmond and San Pablo); (3) Western Alameda County along the Interstate-880 corridor (including portions of the Cities of Berkeley, Oakland, San Leandro, San Lorenzo, Hayward; (4) Portions of the City of San Jose. (5) Eastern San Mateo County (including portions of the Cities of Redwood City and East Palo Alto); and (6) Eastern portions of the City of San Francisco.

3.2.2. Construction, Land Use and Stationary Source Risk and Hazard Thresholds

The options for local risk and hazards thresholds of significance are based on U.S. EPA guidance for conducting air toxics analyses and making risk management decisions at the facility and community-scale level. The thresholds consider reviews of recent health effects studies that link increased concentrations of fine particulate matter to increased mortality. The thresholds would apply to both siting new sources and siting new receptors.

For new sources of TACs, thresholds of significance for a single source are designed to ensure that emissions do not raise the risk of cancer or non-cancer health impacts to cumulatively significant levels. For new sources of $PM_{2.5}$, thresholds are designed to ensure that $PM_{2.5}$ concentrations are maintained below state and federal standards in all areas where sensitive receptors or members of the general public live or may foreseeably live, even if at the local- or community-scale where sources of TACs and PM may be nearby.

Project Radius for Assessing Impacts

For a project proposing a new source or receptor it is recommended to assess impacts within 1,000 feet, taking into account both its individual and nearby cumulative sources (i.e. proposed project plus existing and foreseeable future projects). Cumulative sources are the combined total risk values of each individual source within the 1,000-foot evaluation zone. A lead agency should enlarge the 1,000-foot radius on a case-by-case basis if an unusually large source or sources of risk or hazard emissions that may affect a proposed project is beyond the recommended radius.

The 1,000 foot radius is consistent with findings in ARB's Land Use Compatibility Handbook (ARB 2005), the Health & Safety Code §42301.6 (Notice for Possible Source Near School), and studies such as that of Zhu et al (2002) which found that concentrations of particulate matter tend to be reduced substantially at a distance 1,000 feet downwind from sources such as freeways or large distribution centers.

Qualified Community Risk Reduction Plan

Within the framework of these thresholds, proposed projects would be considered to be less than significant if they are consistent with a qualified Community Risk Reduction Plan (CRRP) adopted by the local jurisdiction with enforceable measures to reduce the community risk.

Project proposed in areas where a CRRP has been adopted that are not consistent with the CRRP would be considered to have a significant impact.

Projects proposed in areas where a CRRP has not been adopted and that have the potential to expose sensitive receptors or the general public to emissions-related risk in excess of the thresholds below from any source would be considered to have a significant air quality impact.

The conclusion that land use projects that comply with qualified Community Risk Reduction Plans are less than significant is supported by CEQA Guidelines Sections 15030(a)(3) and 15064(h)(3), which provides that a project's contribution to a cumulative problem can be less that cumulatively considerable if the project is required to implement or fund its fair share of a mitigation measure or measures designed to alleviate the cumulative impact.

Increased Cancer Risk to Maximally Exposed Individual (MEI)

Emissions from a new source or emissions affecting a new receptor would be considered significant where ground-level concentrations of carcinogenic TACs from any source result in an increased cancer risk greater than 10.0 in one million, assuming a 70 year lifetime exposure. Under Board Option 1, within Impacted Communities as defined through the CARE program, the significance level for cancer would be reduced to 5.0 in one million for new sources.

The 10.0 in one million cancer risk threshold for a single source is supported by EPA's guidance for conducting air toxics analyses and making risk management decisions at the facility and community-scale level. It is also the level set by the Project Risk Requirement in the Air District's Regulation 2, Rule 5 new and modified stationary sources of TAC, which states that the Air Pollution Control Officer shall deny an Authority to Construct or Permit to Operate for any new or modified source of TACs if the project risk exceeds a cancer risk of 10.0 in one million.

This threshold for an individual new source is designed to ensure that the source does not contribute a cumulatively significant impact. The justification for the Tiered Thresholds Option threshold of 5.0 in one million for new sources in an impacted community is that in these areas the cancer risk burden is higher than in other parts of the Bay Area; the threshold at which an individual source becomes significant is lower for an area that is already at or near unhealthy levels. However, even without a tiered approach, the recommended thresholds already address the burden of impacted communities via the cumulative thresholds: specifically, if an area has

many existing TAC sources near receptors, then the cumulative threshold will be reached sooner than it would in another area with fewer TAC sources.

The single-source threshold for receptors is provided to address the possibility that within the area defined by the 1,000 foot radius there can be variations in risk levels that may be significant, below the corresponding cumulative threshold. Single-source thresholds assist in the identification of significant risks, hazards, or concentrations in a subarea, within the 1,000 foot radius.

Increased Non-Cancer Risk to MEI

Emissions from a new source or emissions affecting a new receptor would be considered significant where ground-level concentrations of non-carcinogenic TACs result in an increased chronic or acute Hazard Index (HI) from any source greater than 1.0. This threshold is unchanged under Tiered Thresholds Option.

A HI less than 1.0 represents a TAC concentration, as determined by OEHHA that is at a health protective level. While some TACs pose non-carcinogenic, chronic and acute health hazards, if the TAC concentrations result in a HI less than one, those concentrations have been determined to be less than significant.

Increased Ambient Concentration of $PM_{2.5}$

Emissions from a new source or emissions affecting a new receptor would be considered significant where ground-level concentrations of $PM_{2.5}$ from any source would result in an average annual increase greater than 0.3 $\mu g/m^3$. Under Tiered Thresholds Option, within Impacted Communities as defined through the CARE program, the significance level for a $PM_{2.5}$ increment is 0.2 $\mu g/m^3$.

If one applies the concentration-response of the median of the EPA consensus review (EPA 2005, BAAQMD 2010) and attributes a 1 percent increase in mortality to a 1 $\mu g/m^3$ increase in $PM_{2.5}$, one finds an increase in non-injury mortality in the Bay Area of about 20 excess deaths per million per year from a 0.3 $\mu g/m^3$ increment of $PM_{2.5}$. This is consistent with the impacts reported and considered significant by SFDPH (2008) using an earlier study (Jerrett et al. 2005) to estimate the increase in mortality from a 0.2 $\mu g/m^3$ $PM_{2.5}$ increment.

The SFDPH recommended a lower threshold of significance for multiple sources but only considered roadway emissions within a 492 foot radius. This recommendation applies to a single source but considers all types of emissions within 1,000 feet. On balance, the Air District estimates that the SFDPH threshold and this one, in combination with the cumulative threshold for $PM_{2.5}$, will afford similar levels of health protection.

The $PM_{2.5}$ threshold represents the lower range of an EPA proposed Significant Impact Level (SIL). EPA interprets the SIL to be the level of ambient impact that is considered to represent a "significant contribution" to regional non-attainment. While this threshold was not designed to be a threshold for assessing community risk and hazards, it was designed to protect public health at a regional level by helping an area maintain the NAAQS. Since achieving and maintaining state and federal AAQS is a reasonable goal at the local scale, the SIL provides a useful reference for comparison.

This threshold for an individual new source is designed to ensure that the source does not contribute a cumulatively significant impact. The justification for the Tiered Thresholds Option threshold of 0.2 $\mu g/m^3$ for new sources in an impacted community is that these areas have higher levels of diesel particulate matter than do other parts of the Bay Area; the threshold at which an individual source becomes significant is lower for an area that is already at or near unhealthy

levels. However, even without a tiered approach, the recommended thresholds already address the burden of impacted communities via the cumulative thresholds: specifically, if an area has many existing $PM_{2.5}$ sources near receptors, then the cumulative threshold will be reached sooner than it would in another area with fewer $PM_{2.5}$ sources.

The single-source threshold for receptors is provided to address the possibility that within the area defined by the 1,000 foot radius there can be variations in risk levels that may be significant, below the corresponding cumulative threshold. Single-source thresholds assist in the identification of significant risks, hazards, or concentrations in a subarea, within the 1,000 foot radius.

Accidental Release of Acutely Hazardous Air Emissions

The BAAQMD currently recommends, at a minimum, that the lead agency, in consultation with the administering agency of the Risk Management Prevention Program (RMPP), find that any project resulting in receptors being within the Emergency Response Planning Guidelines (ERPG) exposure level 2 for a facility has a significant air quality impact. ERPG exposure level 2 is defined as "the maximum airborne concentration below which it is believed that nearly all individuals could be exposed for up to one hour without experiencing or developing irreversible or other serious health effects or symptoms which could impair an individual's ability to take protective action."

Staff proposes continuing with the current threshold for the accidental release of hazardous air pollutants. Staff recommends that agencies consult with the California Emergency Management Agency for the most recent guidelines and regulations for the storage of hazardous materials. Staff proposes that projects using or storing acutely hazardous materials locating near existing receptors, and projects resulting in receptors locating near facilities using or storing acutely hazardous materials be considered significant.

The current Accidental Release/Hazardous Air Emissions threshold of significance could affect all projects, regardless of size, and require mitigation for Accidental Release/Hazardous Air Emissions impacts.

3.2.3. Cumulative Risk and Hazard Thresholds

Qualified Community Risk Reduction Plan

Proposed projects would be considered to be less than significant if they are consistent with a qualified Community Risk Reduction Plan (CRRP) adopted by the local jurisdiction with enforceable measures to reduce the community risk.

Project proposed in areas where a CRRP has been adopted that are not consistent with the CRRP would be considered to have a significant impact.

Projects proposed in areas where a CRRP has not been adopted and that have the potential to expose sensitive receptors or the general public to emissions-related risk in excess of the following thresholds from the aggregate of cumulative sources would be considered to have a significant air quality impact.

The conclusion that land use projects that comply with qualified Community Risk Reduction Plans are less than significant is supported by CEQA Guidelines Sections 15030(a)(3) and 15064(h)(3), which provides that a project's contribution to a cumulative problem can be less that cumulatively considerable if the project is required to implement or fund its fair share of a mitigation measure or measures designed to alleviate the cumulative impact.

Increased Cancer Risk to Maximally Exposed Individual (MEI)
Emissions from a new source or emissions affecting a new receptor would be considered significant where ground-level concentrations of carcinogenic TACs from any source result in an increased cancer risk greater than 100.0 in one million.

The significance threshold of 100 in a million increased excess cancer risk would be applied to the cumulative emissions. The 100 in a million threshold is based on EPA guidance for conducting air toxics analyses and making risk management decisions at the facility and community-scale level. In protecting public health with an ample margin of safety, EPA strives to provide maximum feasible protection against risks to health from hazardous air pollutants (HAPs) by limiting risk to a level no higher than the one in ten thousand (100 in a million) estimated risk that a person living near a source would be exposed to at the maximum pollutant concentrations for 70 years (NESHAP 54 Federal Register 38044, September 14, 1989; CAA section 112(f)). One hundred in a million excess cancer cases is also consistent with the ambient cancer risk in the most pristine portions of the Bay Area based on the District's recent regional modeling analysis.

Increased Non-Cancer Risk to MEI
Emissions from a new source or emissions affecting a new receptor would be considered significant where ground-level concentrations of non-carcinogenic TACs result in an increased chronic Hazard Index from any source greater than 10.0.

The Air District has developed an Air Toxics Hot Spots (ATHS) program that provides guidance for implementing the Air Toxics "Hot Spots" Information and Assessment Act (AB 2588, Connelly, 1987: chaptered in the California Health and Safety Code § 44300, et. al.). The ATHS provides that if the health risks resulting from the facility's emissions exceed significance levels established by the air district, the facility is required to conduct an airborne toxic risk reduction audit and develop a plan to implement measures that will reduce emissions from the facility to a level below the significance level. The Air District has established a non-cancer Hazard Index of ten (10.0) as ATHS mandatory risk reduction levels. The cumulative chronic non-cancer Hazard Index threshold is consistent with the Air District's ATHS program.

Increased Ambient Concentration of $PM_{2.5}$
Emissions from a new source or emissions affecting a new receptor would be considered significant where ground-level concentrations of $PM_{2.5}$ from any source would result in an average annual increase greater than 0.8 $\mu g/m^3$.

If one applies the concentration-response function from the U.S, EPA assessment (U.S. EPA 2006) and attributes a 10 percent increase in mortality to a 10 $\mu g/m^3$ increase in $PM_{2.5}$, one finds an increase in non-injury mortality in the Bay Area of about 50 excess deaths per year from a 0.8 $\mu g/m^3$ increment of $PM_{2.5}$. This is greater the impacts reported and considered significant by SFDPH (2008) using an earlier study (Jerrett et al. 2005) to estimate the increase in mortality from a 0.2 $\mu g/m^3$ $PM_{2.5}$ increment (SFDPH reported 21 excess deaths per year). However, SFDPH only considered roadway emissions within a 492 foot radius. This threshold applies to all types of emissions within 1,000 feet. In modeling applications for proposed projects, a larger radius results in a greater number of sources considered and higher modeled concentrations. On balance, the Air District estimates that the SFDPH threshold and this one, in combination with the individual source threshold for $PM_{2.5}$, will afford similar levels of health protection.

The cumulative $PM_{2.5}$ threshold represents the middle range of an EPA proposed Significant Impact Level (SIL). EPA interprets the SIL to be the level of ambient impact that is considered to represent a "significant contribution" to regional non-attainment. While this threshold was not designed to be a threshold for assessing community risk and hazards, it was designed to protect public health at a regional level by helping an area maintain the NAAQS. Since achieving and

maintaining state and federal AAQS is a reasonable goal at the local scale, the SIL provides a useful reference for comparison. Furthermore, the 0.8 µg/m^3 threshold is consistent with studies (Kleinman et al 2007) that examined the potential health impacts of roadway particles.

3.2.4. Plan-Level Risk and Hazard Thresholds

Staff proposes plan-level thresholds that will encourage a programmatic approach to addressing the overall adverse conditions resulting from risks and hazards that many Bay Area communities experience. By designating overlay zones in land use plans, local land use jurisdictions can take preemptive action before project-level review to reduce the potential for significant exposures to risk and hazard emissions. While this will require more up-front work at the general plan level, in the long-run this approach is a more feasible approach consistent with Air District and CARB guidance about siting sources and sensitive receptors that is more effective than project by project consideration of effects that often has more limited mitigation opportunities. This approach would also promote more robust cumulative consideration of effects of both existing and future development for the plan-level CEQA analysis as well as subsequent project-level analysis.

For local plans to have a less-than-significant impact with respect to potential risks and hazards, overlay zones would have to be established around existing and proposed land uses that would emit these air pollutants. Overlay zones to avoid risk impacts should be reflected in local plan policies, land use map(s), and implementing ordinances (e.g., zoning ordinance). The overlay zones around existing and future risk sources would be delineated using the quantitative approaches described above for project-level review and the resultant risk buffers would be included in the General Plan (or the EIR for the General Plan) to assist in site planning. BAAQMD will provide guidance as to the methods used to establish the TAC buffers and what standards to be applied for acceptable exposure level in the updated CEQA Guidelines document. Special overlay zones of at least 500 feet (or an appropriate distance determined by modeling and approved by the Air District) on each side of all freeways and high volume roadways would be included in this threshold.

The threshold of significance for plan impacts could affect all plan adoptions and amendments and require mitigation for a plan's air quality impacts. Where sensitive receptors would be exposed above the acceptable exposure level, the plan impacts would be considered significant and mitigation would be required to be imposed either at the plan level (through policy) or at the project level (through project level requirements).

3.2.5. Community Risk Reduction Plans

The goal of a Community Risk Reduction Plan would be to bring TAC and $PM_{2.5}$ concentrations for the entire community covered by the Plan down to acceptable levels as identified by the local jurisdiction and approved by the Air District. This approach provides local agencies a proactive alternative to addressing communities with high levels of risk on a project-by-project approach. This approach is supported by CEQA Guidelines Section 15030(a)(3), which provides that a project's contribution to a cumulative problem can be less than cumulatively considerable "if the project is required to implement or fund its fair share of a mitigation measure or measures designed to alleviate the cumulative impact." This approach is also further supported by CEQA Guidelines Section 15064(h)(3), which provides that a project's contribution to a cumulative effect is not considerable "if the project will comply with the requirements in a previously approved plan or mitigation program which provides specific requirements that will avoid or substantially lessen the cumulative problem."

Qualified Community Risk Reduction Plans

(A) A qualified Community Risk Reduction Plan adopted by a local jurisdiction should include, at a minimum, the following elements. The District's revised CEQA Guidelines provides the methodology to determine if a Community Risk Reduction Plan meets these requirements. Define a planning area;

(B) Include base year and future year emissions inventories of TACs and PM2.5;

(C) Include Air District–approved risk modeling of current and future risks;

(D) Establish risk and exposure reduction goals and targets for the community in consultation with Air District staff;

(E) Identify feasible, quantifiable, and verifiable measures to reduce emissions and exposures;

(F) Include procedures for monitoring and updating the inventory, modeling and reduction measures in coordination with Air District staff;

(G) Be adopted in a public process following environmental review.

4. CRITERIA POLLUTANT THRESHOLDS

4.1. THRESHOLDS OF SIGNIFICANCE

Project Construction	
Pollutant	**Average Daily (pounds/day)**
ROG (reactive organic gases)	54
NO_X (nitrogen oxides)	54
PM_{10} (exhaust) (particulate matter-10 microns)	82
$PM_{2.5}$ (exhaust) (particulate matter-2.5 microns)	54
$PM_{10}/PM_{2.5}$ (fugitive dust)	Best Management Practices
Local CO (carbon monoxide)	None

Project Operations		
Pollutant	**Average Daily (pounds/day)**	**Maximum Annual (tons/year)**
ROG	54	10
NO_X	54	10
PM_{10}	82	15
$PM_{2.5}$	54	10
Local CO	9.0 ppm (8-hour average), 20.0 ppm (1-hour average)	

Plans
1. Consistency with Current Air Quality Plan control measures 2. Projected VMT or vehicle trip increase is less than or equal to projected population increase

Regional Plans (Transportation and Air Quality Plans)
No net increase in emissions of criteria air pollutants and precursors

4.2. JUSTIFICATION AND SUBSTANTIAL EVIDENCE SUPPORTING THRESHOLDS

4.2.1. Project Construction Criteria Pollutant Thresholds

Staff proposes criteria pollutant construction thresholds that add significance criteria for exhaust emissions to the existing fugitive dust criteria employed by the Air District. While our current Guidelines considered construction exhaust emissions controlled by the overall air quality plan, the implementation of new and more stringent state and federal standards over the past ten years now warrants additional control of this source of emissions.

The average daily criteria air pollutant and precursor emission levels shown above are recommended as the thresholds of significance for construction activity for exhaust emissions. These thresholds represent the levels above which a project's individual emissions would result in a considerable contribution (i.e., significant) to the SFBAAB's existing non-attainment air quality

conditions and thus establish a nexus to regional air quality impacts that satisfies CEQA requirements for evidence-based determinations of significant impacts.

For fugitive dust emissions, staff recommends following the current best management practices approach which has been a pragmatic and effective approach to the control of fugitive dust emissions. Studies have demonstrated (Western Regional Air Partnership, U.S.EPA) that the application of best management practices at construction sites have significantly controlled fugitive dust emissions. Individual measures have been shown to reduce fugitive dust by anywhere from 30 percent to more than 90 percent. In the aggregate best management practices will substantially reduce fugitive dust emissions from construction sites. These studies support staff's recommendation that projects implementing construction best management practices will reduce fugitive dust emissions to a less than significant level.

4.2.2. Project Operation Criteria Pollutant Thresholds

The thresholds for project operations are the average daily and maximum annual criteria air pollutant and precursor levels shown above. These thresholds are based on the federal BAAQMD Offset Requirements to ozone precursors for which the SFBAAB is designated as a non-attainment area which is an appropriate approach to prevent further deterioration of ambient air quality and thus has nexus and proportionality to prevention of a regionally cumulative significant impact (e.g. worsened status of non-attainment). Despite non-attainment area for state PM_{10} and pending nonattainment for federal $PM_{2.5}$, the federal NSR Significant Emission Rate annual limits of 15 and 10 tons per year, respectively, are the thresholds as BAAQMD has not established an Offset Requirement limit for $PM_{2.5}$ and the existing limit of 100 tons per year is much less stringent and would not be appropriate in light of our pending nonattainment designation for the federal 24-hour $PM_{2.5}$ standard. These thresholds represent the emission levels above which a project's individual emissions would result in a cumulatively considerable contribution to the SFBAAB's existing air quality conditions. The thresholds would be an evaluation of the incremental contribution of a project to a significant cumulative impact. These threshold levels are well-established in terms of existing regulations as promoting review of emissions sources to prevent cumulative deterioration of air quality. Using existing environmental standards in this way to establish CEQA thresholds of significance under Guidelines section 15067.4 is an appropriate and effective means of promoting consistency in significance determinations and integrating CEQA environmental review activities with other areas of environmental regulation. (*See Communities for a Better Environment v. California Resources Agency* (2002) 103 Cal. App. 4th 98, 111.[10])

4.2.3. Local Carbon Monoxide Thresholds

The carbon monoxide thresholds are based solely on ambient concentration limits set by the California Clean Air Act for Carbon Monoxide and Appendix G of the State of California CEQA Guidelines.

Since the ambient air quality standards are health-based (i.e., protective of public health), there is substantial evidence (i.e., health studies that the standards are based on) in support of their use

[10] The Court of Appeal in the *Communities for a Better Environment* case held that existing regulatory standards could not be used as a definitive determination of whether a project would be significant under CEQA where there is substantial evidence to the contrary. Staff's thresholds would not do that. The thresholds are levels at which a project's emissions would normally be significant, but would not be binding on a lead agency if there is contrary evidence in the record.

as CEQA significance thresholds. The use of the ambient standard would relate directly to the CEQA checklist question. By not using a proxy standard, there would be a definitive bright line about what is or is not a significant impact and that line would be set using a health-based level.

The CAAQS of 20.0 ppm and 9 ppm for 1-hour and 8-hour CO, respectively, would be used as the thresholds of significance for localized concentrations of CO. Carbon monoxide is a directly emitted pollutant with primarily localized adverse effects when concentrations exceed the health based standards established by the California Air Resources Board (ARB).

In addition, Appendix G of the State of California CEQA Guidelines includes the checklist question: Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation? Answering yes to this question would indicate that the project would result in a significant impact under CEQA. The use of the ambient standard would relate directly to this checklist question.

4.2.4. Plan-Level Criteria Pollutant Thresholds

This threshold achieves the same goals as the Air District's current approach while alleviating the existing analytical difficulties and the inconsistency of comparing a plan update with AQP growth projections that may be up to several years old. Eliminating the analytical inconsistency provides better nexus and proportionality for evaluating air quality impacts for plans.

Over the years staff has received comments on the difficulties inherent in the current approach regarding the consistency tests for population and VMT growth. First, the population growth estimates used in the most recent AQP can be up to several years older than growth estimates used in a recent plan update, creating an inconsistency in this analysis. Staff recommends that this test of consistency be eliminated because the Air District and local jurisdictions all use regional population growth estimates that are disaggregated to local cities and counties. In addition, the impact to air quality is not necessarily growth but where that growth is located. The second test, rate of increase in vehicle use compared to growth rate, will determine if planned growth will impact air quality. Compact infill development inherently has less vehicle travel and more transit opportunities than suburban sprawl.

Second, the consistency test of comparing the rate of increase in VMT to the rate of increase in population has been problematic at times for practitioners because VMT is not always available with the project analysis. Staff recommends that either the rate of increase in VMT or vehicle trips be compared to the rate of increase in population. Staff also recommends that the growth estimates used in this analysis be for the years covered by the plan. Staff also recommends that the growth estimates be obtained from the Association of Bay Area Governments since the Air District uses ABAG growth estimates for air quality planning purposes.

4.2.5. Criteria Pollutant Thresholds for Regional Plans

Regional plans include the Regional Transportation Plan prepared by the Metropolitan Transportation Commission (MTC) and air quality plans prepared by the Air District.

The Regional Transportation Plan (RTP), also called a Metropolitan Transportation Plan (MTP) or Long-Range Transportation Plan is the mechanism used in California by both Metropolitan Planning Organizations (MPOs) and Regional Transportation Planning Agencies (RTPAs) to conduct long-range (minimum of 20 years) planning in their regions. MTC functions as both the regional transportation planning agency, a state designation, and, for federal purposes, as the region's metropolitan planning organization (MPO). As such, it is responsible for regularly updating the Regional Transportation Plan, a comprehensive blueprint for the development of

comprehensive transportation system that includes mass transit, highway, airport, seaport, railroad, bicycle and pedestrian facilities. The performance of this system affects such public policy concerns as air quality, environmental resource consumption, social equity, "smart growth," economic development, safety, and security. Transportation planning recognizes the critical links between transportation and other societal goals. The planning process requires developing strategies for operating, managing, maintaining, and financing the area's transportation system in such a way as to advance the area's long-term goals.

The Air District periodically prepares and updates plans to achieve the goal of healthy air. Typically, a plan will analyze emissions inventories (estimates of current and future emissions from industry, motor vehicles, and other sources) and combine that information with air monitoring data (used to assess progress in improving air quality) and computer modeling simulations to test future strategies to reduce emissions in order to achieve air quality standards. Air quality plans usually include measures to reduce air pollutant emissions from industrial facilities, commercial processes, motor vehicles, and other sources. Bay Area air quality plans are prepared with the cooperation of MTC and the Association of Bay Area Governments (ABAG).

The threshold of significance for regional plans is no net increase in emissions including criteria pollutant emissions. This threshold serves to answer the State CEQA Guidelines Appendix G sample question: "Would the project Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?"

5. ODOR THRESHOLDS

5.1. THRESHOLDS OF SIGNIFICANCE

Project Operations – Source or Receptor	Plans
Five confirmed complaints per year averaged over three years	Identify the location, and include policies to reduce the impacts, of existing or planned sources of odors

5.2. JUSTIFICATION AND SUBSTANTIAL EVIDENCE SUPPORTING THRESHOLDS

Staff proposes revising the current CEQA significance threshold for odors to be consistent with the Air District's regulation governing odor nuisances (Regulation 7—Odorous Substances). The current approach includes assessing the number of unconfirmed complaints which are not considered indicative of actual odor impacts. Basing the threshold on an average of five confirmed complaints per year over a three year period reflects the most stringent standards derived from the Air District rule and is therefore considered an appropriate approach to a CEQA evaluation of odor impacts.

Odors are generally considered a nuisance, but can result in a public health concern. Some land uses that are needed to provide services to the population of an area can result in offensive odors, such as filling portable propane tanks or recycling center operations. When a proposed project includes the siting of sensitive receptors in proximity to an existing odor source, or when siting a new source of potential odors, the following qualitative evaluation should be performed.

When determining whether potential for odor impacts exists, it is recommended that Lead Agencies consider the following factors and make a determination based on evidence in each qualitative analysis category:

Distance: Use the screening-level distances in Table 9.

Wind Direction: Consider whether sensitive receptors are located upwind or downwind from the source for the most of the year. If odor occurrences associated with the source are seasonal in nature, consider whether sensitive receptors are located downwind during the season in which odor emissions occur.

Complaint History: Consider whether there is a history of complaints associated with the source. If there is no complaint history associated with a particular source (perhaps because sensitive receptors do not already exist in proximity to the source), consider complaint-history associated with other similar sources in BAAQMD's jurisdiction with potential to emit the same or similar types of odorous chemicals or compounds, or that accommodate similar types of processes.

Character of Source: Consider the character of the odor source, for example, the type of odor events according to duration of exposure or averaging time (e.g., continuous release, frequent release events, or infrequent events).

Exposure: Consider whether the project would result in the exposure of a substantial number of people to odorous emissions.

Table D-10 – Screening Distances for Potential Odor Sources

Type of Operation Project Screening	Distance
Wastewater Treatment Plant	2 miles
Wastewater Pumping Facilities	1 mile
Sanitary Landfill	2 miles
Transfer Station	1 mile
Composting Facility	1 mile
Petroleum Refinery	2 miles
Asphalt Batch Plant	2 miles
Chemical Manufacturing	2 miles
Fiberglass Manufacturing	1 mile
Painting/Coating Operations	1 mile
Rendering Plant	2 miles
Food Processing Facility	1 mile
Confined Animal Facility/Feed Lot/Dairy	1 mile
Green Waste and Recycling Operations	1 mile
Coffee Roaster	1 mile

California Integrated Waste Management Board (CIWMB). Facilities that are regulated by the CIWMB (e.g. landfill, composting, etc.) are required to have Odor Impact Minimization Plans (OIMP) in place and have procedures that establish fence line odor detection thresholds. The Air District recognizes a Lead Agency's discretion under CEQA to use established odor detection thresholds as thresholds of significance for CEQA review for CIWMB regulated facilities with an adopted OIMP.

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BAY AREA AIR QUALITY MANAGEMENT DISTRICT

RESOLUTION No. 2010-06

A Resolution of the Board of Directors of the Bay Area Air Quality Management District Adopting Thresholds For Use In Determining the Significance of Projects' Environmental Effects Under the California Environmental Quality Act

WHEREAS, pursuant to Title 14, Chapter 3, Article 5, Section 15064.7 of the California Code of Regulations ("Section 15064.7"), the California Resources Agency encourages public agencies to adopt "Thresholds of Significance" under the California Environmental Quality Act ("CEQA");

WHEREAS, pursuant to Section 15064.7, CEQA Thresholds of Significance are identifiable quantitative, qualitative or performance levels of a particular environmental effect, non-compliance with which means the effect will normally be determined to be "significant" under CEQA, and compliance with which means the effect normally will be determined to be less than significant under CEQA;

WHEREAS, the Board of Directors ("Board") of the Bay Area Air Quality Management District ("District") finds it necessary and appropriate to adopt CEQA Thresholds of Significance as set forth in Attachment A hereto for use by District staff and by other appropriate agencies in determining whether projects may have significant effects on the environment for purposes of CEQA environmental analyses;

WHEREAS, the CEQA Thresholds of Significance as set forth in Attachment A hereto do not alter the existing procedural and substantive requirements of CEQA under California law, but simply clarify the level at which, in the District's considered opinion, an environmental effect should normally be considered "significant" for purposes of existing CEQA law;

WHEREAS, the CEQA Thresholds of Significance set forth in Attachment A hereto were developed through an extensive public review process, which included public workshops, Board meetings and meetings with local government agency and non-government organization staff, including the cities of Berkeley, Colma, Daly City, Dublin, Fremont, Livermore, Oakland, Pleasanton, Richmond, San Leandro, San Mateo, San Francisco and Santa Rosa; the counties of Alameda, Contra Costa, Napa, Santa Clara, and Sonoma; and the CARE Task Force, the Alameda County Planning for Healthy Communities Network and the Governor's Office of Planning and Research Local Government Roundtable;

WHEREAS, District staff held ten public workshops throughout the Bay Area on February 26, 2009, April 27, 29 and 30, 2009, September 8, 9, and 10, 2009, October 2, 2009, and April 15 and 26, 2010; solicited Thresholds of Significance options for consideration; and published for public review and comment the Threshold Options Report on April 24, 2009, the CEQA Thresholds Options and Justification Report on October 8, 2009, and the Proposed Thresholds of Significance Report on November 2, 2009, December 7, 2009 and May 3, 2010;

meetings were held on November 18, 2009, December 2, 2009, January 6, 2010, May 5, 2010 and June 2, 2010;

WHEREAS, at the November 18, 2009, December 2, 2009, January 6, 2010, May 5, 2010 and June 2, 2010 public meetings, the subject matter of the Thresholds of Significance was discussed with interested persons in accordance with all provisions of law;

WHEREAS, the November 18, 2009, December 2, 2009, January 6, 2010, May 5, 2010 and June 2, 2010 public meetings and the other public review opportunities that the District has provided regarding the Thresholds of Significance, constitute a public review process as required by Section 15064.7;

WHEREAS, District staff has prepared and presented to this Board the May 3, 2010, Proposed Thresholds of Significance report, which has been considered by this Board and is incorporated herein by reference;

WHEREAS, the documents and other materials that constitute the record of the public review process under Section 15064.7 on which this Resolution is based are located at the Bay Area Air Quality Management District, 939 Ellis Street, San Francisco, 94109, and the custodian for these documents is Ms. Lisa Harper, Clerk of the Boards;

WHEREAS, District staff recommends adoption of the CEQA Thresholds of Significance set forth in Attachment A hereto;

WHEREAS, the Board of Directors concurs with District staff's recommendations and desires to adopt the CEQA Thresholds of Significance set forth in Attachment A hereto;

NOW, THEREFORE, BE IT RESOLVED that that the Board of Directors of the Bay Area Air Quality Management District does hereby adopt the CEQA Thresholds of Significance, pursuant to the authority granted by law, as set forth in Attachment A hereto, and discussed in the Proposed Thresholds of Significance report dated May 3, 2010, with instructions to staff to correct any typographical or formatting errors before final publication of the CEQA Thresholds of Significance.

BE IT FURTHER RESOLVED that it is the policy of the Bay Area Air Quality Management District that projects that do not comply with the CEQA Thresholds of Significance will normally be determined to have a significant effect on the environment for purposes of CEQA, and projects that comply with the CEQA Thresholds of Significance normally will be determined to have a less-than-significant effect on the environment for purposes of CEQA.

BE IT FURTHER RESOLVED that it is the policy of the Bay Area Air Quality Management District that Lead Agencies in the Bay Area apply the CEQA Thresholds of Significance, except for the Risk and Hazard thresholds for Receptor Projects, for Notices of Preparation issued, and environmental analyses begun, on or after the date of adoption of this Resolution.

BE IT FURTHER RESOLVED that it is the policy of the Bay Area Air Quality Management District that Lead Agencies in the Bay Area apply the CEQA Thresholds of Significance for the

Risk and Hazard thresholds for Receptor Projects for Notices of Preparation issued, and environmental analyses begun, after January 1, 2011.

The foregoing Resolution was duly and regularly introduced, passed and adopted at a regular meeting of the Board of Directors of the Bay Area Air Quality Management District on the Motion of Director KALRA, seconded by Director UILKEMA, on the 2nd day of JUNE, 2010, by the following vote of the Board:

AYES: BATES, GARNER, GIOIA, GROOM, HOSTERMAN, HUDSON, KALRA, MAR, ROSS, SPERING, TORLIATT, UILKEMA, YEAGER, WAGENKNECHT

NOES: NONE

RECUSED: HAGGERTY

ABSENT: BROWN, DALY, DUNNIGAN, KLATT, KNISS, MILEY, ZANE

Brad Wagenknecht
Chairperson of the Board of Directors

ATTEST:

John Gioia
Secretary of the Board of Directors

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ATTACHMENT A

Proposed Air Quality CEQA Thresholds of Significance (May 3, 2010)

Pollutant	Construction-Related	Operational-Related	
Project-Level			
Criteria Air Pollutants and Precursors (Regional)	Average Daily Emissions (lb/day)	Average Daily Emissions (lb/day)	Maximum Annual Emissions (tpy)
ROG	54	54	10
NO_X	54	54	10
PM_{10} (exhaust)	82	82	15
$PM_{2.5}$ (exhaust)	54	54	10
$PM_{10}/PM_{2.5}$ (fugitive dust)	Best Management Practices	None	
Local CO	None	9.0 ppm (8-hour average), 20.0 ppm (1-hour average)	
GHGs **Projects other than Stationary Sources**	None	Compliance with Qualified Greenhouse Gas Reduction Strategy OR 1,100 MT of CO_2e/yr OR 4.6 MT CO_2e/SP/yr (residents + employees)	
GHGs **Stationary Sources**	None	10,000 MT/yr	
Risks and Hazards – New Source (Individual Project)	Same as Operational Thresholds*	Compliance with Qualified Community Risk Reduction Plan OR Increased cancer risk of >10.0 in a million Increased non-cancer risk of > 1.0 Hazard Index (Chronic or Acute) Ambient $PM_{2.5}$ increase: > 0.3 $\mu g/m^3$ annual average Zone of Influence: 1,000-foot radius from fence line of source or receptor	
Risks and Hazards – New Receptor (Individual Project)	Same as Operational Thresholds*	Compliance with Qualified Community Risk Reduction Plan OR Increased cancer risk of >10.0 in a million Increased non-cancer risk of > 1.0 Hazard Index (Chronic or Acute) Ambient $PM_{2.5}$ increase: > 0.3 $\mu g/m^3$ annual average Zone of Influence: 1,000-foot radius from fence line of source or receptor	
Risks and Hazards – New Source (Cumulative Thresholds)	Same as Operational Thresholds*	Compliance with Qualified Community Risk Reduction Plan OR Cancer: > 100 in a million (from all local sources) Non-cancer: > 10.0 Hazard Index (from all local sources) (Chronic) $PM_{2.5}$: > 0.8 $\mu g/m^3$ annual average (from all local sources) Zone of Influence: 1,000-foot radius from fence line of source or receptor	

Proposed Air Quality CEQA Thresholds of Significance (May 3, 2010)		
Pollutant	**Construction-Related**	**Operational-Related**
Risks and Hazards – New Receptor (Cumulative Thresholds)	Same as Operational Thresholds*	Compliance with Qualified Community Risk Reduction Plan OR Cancer: > 100 in a million (from all local sources) Non-cancer: > 10.0 Hazard Index (from all local sources) (Chronic) $PM_{2.5}$: > 0.8 $\mu g/m^3$ annual average (from all local sources) Zone of Influence: 1,000-foot radius from fence line of source or receptor
Accidental Release of Acutely Hazardous Air Pollutants	None	Storage or use of acutely hazardous materials locating near receptors or receptors locating near stored or used acutely hazardous materials considered significant
Odors	None	Complaint History—5 confirmed complaints per year averaged over three years
Plan-Level		
Criteria Air Pollutants and Precursors	None	1. Consistency with Current Air Quality Plan control measures 2. Projected VMT or vehicle trip increase is less than or equal to projected population increase
GHGs	None	Compliance with Qualified Greenhouse Gas Reduction Strategy (or similar criteria included in a General Plan) OR 6.6 MT CO2e/ SP/yr (residents + employees)
Risks and Hazards	None	1. Overlay zones around existing and planned sources of TACs (including adopted Risk Reduction Plan areas) 2. Overlay zones of at least 500 feet (or Air District-approved modeled distance) from all freeways and high volume roadways
Odors	None	Identify locations of odor sources in general plan
Accidental Release of Acutely Hazardous Air Pollutants	None	None
Regional Plans (Transportation and Air Quality Plans)		
GHGs, Criteria Air Pollutants and Precursors, and Toxic Air Contaminants	None	No net increase in emissions

Notes: CO = carbon monoxide; CO_2e = carbon dioxide equivalent; GHGs = greenhouse gases; lb/day = pounds per day; MT = metric tons; NO_X = oxides of nitrogen; $PM_{2.5}$= fine particulate matter with an aerodynamic resistance diameter of 2.5 micrometers or less; PM_{10} = respirable particulate matter with an aerodynamic resistance diameter of 10 micrometers or less; ppm = parts per million; ROG = reactive organic gases; SP = service population; tpy = tons per year; yr= year.

* Note: The Air District recommends that for construction projects that are less than one year duration, Lead Agencies should annualize impacts over the scope of actual days that peak impacts are to occur, rather than the full year.

E. GLOSSARY

Aerosol -- Particle of solid or liquid matter that can remain suspended in the air because of its small size (generally under one micrometer in diameter).

Air Quality Management District (AQMD) -- Local agency charged with controlling air pollution and attaining air quality standards. The Bay Area Air Quality Management District is the regional AQMD that includes Alameda, Contra Costa, Marin, Napa, San Francisco, San Mateo and Santa Clara Counties and the southern halves of Solano and Sonoma Counties.

Air Resources Board (ARB) -- The State of California agency responsible for air pollution control. Responsibilities include: establishing State ambient air quality standards, setting allowable emission levels for motor vehicles in California and oversight of local air quality management districts.

Area Sources -- Sources of air pollutants that individually emit relatively small quantities of air pollutants, but that may emit considerable quantities of emissions when aggregated over a large area. Examples include water heaters, lawn maintenance equipment, and consumer products.

Best Available Control Technology (BACT) -- The most stringent emissions control that has been achieved in practice, identified in a state implementation plan, or found by the District to be technologically feasible and cost-effective for a given class of sources.

California Clean Air Act (CCAA) -- Legislation enacted in 1988 mandating a planning process to attain state ambient air quality standards.

CALINE -- A model developed by the Air Resources Board that calculates carbon monoxide concentrations resulting from motor vehicle use.

Carbon Monoxide (CO) -- A colorless, odorless, toxic gas produced by the incomplete combustion of carbon-containing substances. It is emitted in large quantities by exhaust of gasoline-powered vehicles.

Carbon Dioxide (CO_2) -- A colorless, odorless gas that is an important contributor to Earth's greenhouse effect.

Carbon Dioxide Equivalent (CO_2E) -- A metric measure used to compare the emissions from various greenhouse gases based upon their global warming potential.

Chlorofluorocarbons (CFCs) -- A family of inert, nontoxic, and easily liquefied chemicals used in refrigeration, air conditioning, packaging, insulation, or as solvents and aerosol propellants. CFCs drift into the upper atmosphere where their chlorine components destroy stratospheric ozone.

Clean Air Act (CAA) -- Long-standing federal legislation, last amended in 1990, that is the legal basis for the national clean air programs.

Conformity -- A requirement in federal law and administrative practice that requires that projects will not be approved if they do not conform with the State Implementation Plan by: causing or contributing to an increase in air pollutant emissions, violating an air pollutant standard, or increasing the frequency of violations of an air pollutant standard.

Criteria Air Pollutants -- Air pollutants for which the federal or State government has established ambient air quality standards, or criteria, for outdoor concentration in order to protect public health. Criteria pollutants include: ozone, carbon monoxide, sulfur dioxide PM10 (previously total suspended particulate), nitrogen oxide, and lead.

EMFAC -- The computer model developed by the California Air Resources Board to estimate composite on-road motor vehicle emission factors by vehicle class.

Emission Factor -- The amount of a specific pollutant emitted from a specified polluting source per unit quantity of material handled, processed, or burned.

Emission Inventory -- A list of air pollutants emitted over a determined area by type of source. Typically expressed in mass per unit time.

Environmental Protection Agency (EPA) -- The federal agency responsible for control of air and water pollution, toxic substances, solid waste, and cleanup of contaminated sites.

Exceedance -- A monitored level of concentration of any air contaminant higher than national or state ambient air quality standards.

Global Warming Potential (GWP) -- The index used to translate the level of emissions of various gases into a common measure in order to compare the relative radiative forcing of different gases without directly calculating the changes in atmospheric concentrations. GWPs are calculated as the ratio of the radiative forcing that would result from the emissions of one kilogram of a greenhouse gas to that from emission of one kilogram of carbon dioxide over a period of time (usually 100 years).

Greenhouse Gas (GHG) -- Any gas that absorbs infrared radiation in the atmosphere. Greenhouse gases include water vapor, carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), halogenated fluorocarbons (HCFCs), ozone (O_3), perfluorocarbons (PFCs), sulfur hexafluoride (SF_6) and hydrofluorocarbons (HFCs).

Hazardous Air Pollutants – Federal terminology for air pollutants which are not covered by ambient air quality standards but may reasonably be expected to cause or contribute to serious illness or death (see NESHAPs).

Health Risk Assessment -- An analysis where human exposure to toxic substances is estimated, and considered together with information regarding the toxic potency of the substances, to provide quantitative estimates of health risk.

Hot Spot -- A location where emissions from specific sources may expose individuals and population groups to elevated risks of adverse health effects and contribute to the cumulative health risks of emissions from other sources in the area.

Hydrogen Sulfide (H_2S) -- A gas characterized by "rotten egg" smell, found in the vicinity of oil refineries, chemical plants and sewage treatment plants.

Impacted Communities – Also known as priority communities, the Air District defines impacted communities within the Bay Area as having higher emitting sources, highest air concentrations, and nearby low income and sensitive populations. The Air District identified the following impacted communities: the urban core areas of Concord, eastern San Francisco, western Alameda County, Redwood City/East Palo Alto, Richmond/San Pablo, and San Jose.

Indirect Sources – Land uses and facilities that attract or generate motor vehicle trips and thus result in air pollutant emissions, e.g., shopping centers, office buildings, and airports.

Inversion -- The phenomenon of a layer of warm air over cooler air below. This atmospheric condition resists the natural dispersion and dilution of air pollutants.

Level of Service (LOS) -- A transportation planning term for a method of measurement of traffic congestion. The LOS compares actual or projected traffic volume to the maximum capacity of the road under study. LOS ranges from A through F. LOS A describes free flow conditions, while LOS F describes the most congested conditions, up to or over the maximum capacity for which the road was designed.

Mobile Source -- Any motor vehicle that produces air pollution, e.g., cars, trucks, motorcycles (on-road mobile sources) or airplanes, trains and construction equipment (off-road mobile sources).

National Ambient Air Quality Standards (NAAQS) -- Health-based pollutant concentration limits established by EPA that apply to outdoor air (see Criteria Air Pollutants).

National Emissions Standards for Hazardous Air Pollutants (NESHAPs) – Emissions standards set by EPA for air pollutants not covered by NAAQS that may cause an increase in deaths or in serious, irreversible, or incapacitating illness.

Nitrogen Oxides (NO_X) -- Gases formed in great part from atmospheric nitrogen and oxygen when combustion takes place under conditions of high temperature and high pressure; NOX is a precursor to the criteria air pollutant ozone.

Nonattainment Area -- Defined geographic area that does not meet one or more of the

Ambient Air Quality Standards for the criteria pollutants designated in the federal Clean Air Act and/or California Clean Air Act.

Ozone (O_3) -- A pungent, colorless, toxic gas. A product of complex photochemical processes, usually in the presence of sunlight. Tropospheric (lower atmosphere) ozone is a criteria air pollutant.

Particulate -- A particle of solid or liquid matter; soot, dust, aerosols, fumes and mists.

Photochemical Process -- The chemical changes brought about by the radiant energy of the sun acting upon various polluting substances. The products are known as photochemical smog.

$PM_{2.5}$ -- Fine particulate matter (solid or liquid) with an aerodynamic diameter equal to or less than 2.5 micrometers. Individual particles of this size are small enough to be inhaled deeply into the lungs..

PM_{10} -- Fine particulate matter (solid or liquid) with an aerodynamic diameter equal to or less than 10 micrometers. Individual particles of this size are small enough to be inhaled into human lungs; they are not visible to the human eye.

Precursor -- Compounds that change chemically or physically after being emitted into the air and eventually produce air pollutants. For example, organic compounds are precursors to ozone.

Prevention of Significant Deterioration (PSD) -- EPA program in which State and/or federal permits are required that are intended to restrict emissions for new or modified sources in places where air quality is already better than required to meet primary and secondary ambient air quality standards.

Reactive Organic Gases (ROG) -- Classes of organic compounds, especially olefins, substituted aromatics and aldehydes, that react rapidly in the atmosphere to form photochemical smog or ozone.

Sensitive Receptors -- Facilities or land uses that include members of the population that are particularly sensitive to the effects of air pollutants, such as children, the elderly, and people with illnesses. Examples include schools, hospitals and residential areas.

State Implementation Plan (SIP) -- EPA-approved state plans for attaining and maintaining federal air quality standards.

Stationary Source -- A fixed, non-mobile source of air pollution, usually found at industrial or commercial facilities.

Sulfur Oxides (SO_X) -- Pungent, colorless gases formed primarily by the combustion of sulfur-containing fossil fuels, especially coal and oil. Considered a criteria air pollutant, sulfur oxides may damage the respiratory tract as well as vegetation.

Toxic Air Contaminants -- Air pollutants which cause illness or death in relatively small quantities. Non-criteria air contaminants that, upon exposure, ingestion, inhalation, or assimilation into organisms either directly from the environment or indirectly by ingestion through food chains, may cause death, disease, behavioral abnormalities, cancer, genetic mutations, physiological malfunctions, or physical deformations in such organisms or their offspring.

Transportation Control Measures (TCMs) -- Measures to reduce traffic congestion and decrease emissions from motor vehicles by reducing vehicle use.

URBEMIS -- A computer model developed by the California Air Resources Board to estimate air pollutant emissions from motor vehicle trips associated with land use development.

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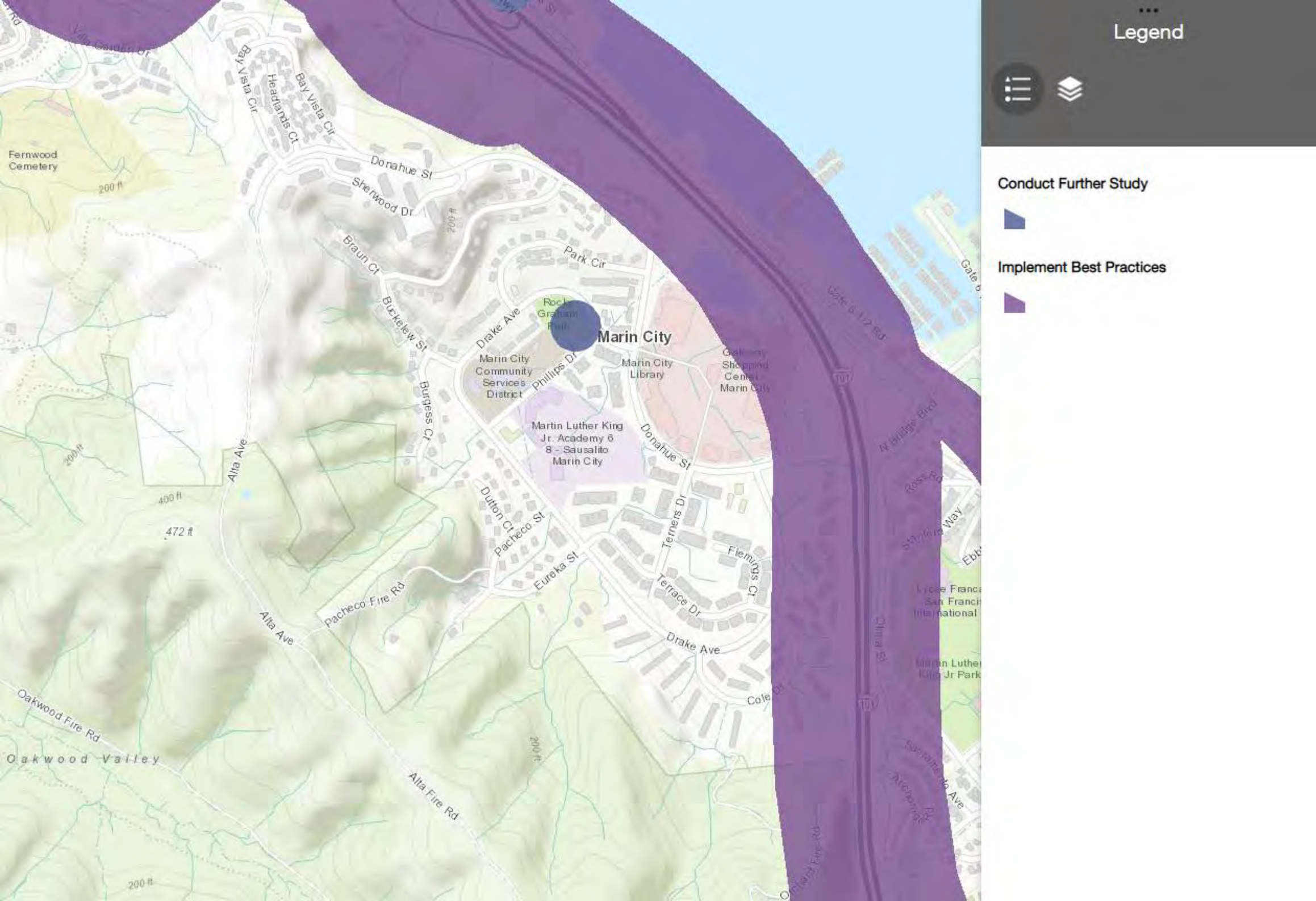
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Terrace Dr
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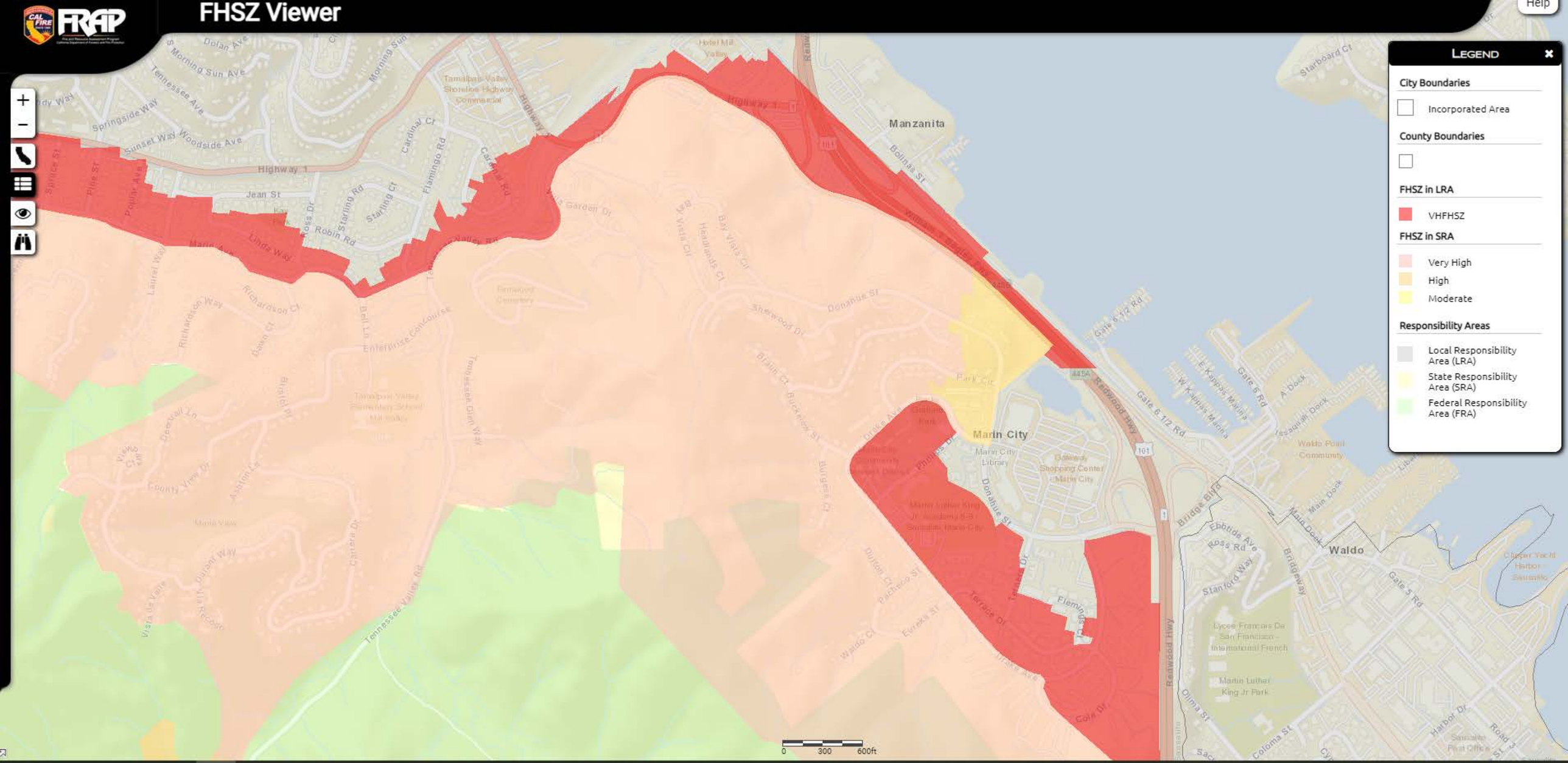
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Waldo
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Redwood Hwy
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Bridge Blvd
Main Dock
Bridgeway
Donahue St
Terrace Dr
Tennessee Valley Rd
Enterprise Concourse
Tamalpais Valley Shoreline Highway Commercial
Tamalpais Valley Elementary School Mill Valley
Marin City Library
Gateway Shopping Center Marin City
Waldo Point Community
Lycee Francais De San Francisco - International French
Martin Luther King Jr Park
Clipper Yacht Harbor Sausalito
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AIR QUALITY AND LAND USE HANDBOOK: A COMMUNITY HEALTH PERSPECTIVE

April 2005

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California Air Resources Board

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To My Local Government Colleagues....

I am pleased to introduce this informational guide to air quality and land use issues focused on community health. As a former county supervisor, I know from experience the complexity of local land use decisions. There are multiple factors to consider and balance. This document provides important public health information that we hope will be considered along with housing needs, economic development priorities, and other quality of life issues.

An important focus of this document is prevention. We hope the air quality information provided will help inform decision-makers about the benefits of avoiding certain siting situations. The overarching goal is to avoid placing people in harm's way. Recent studies have shown that public exposure to air pollution can be substantially elevated near freeways and certain other facilities. What is encouraging is that the health risk is greatly reduced with distance. For that reason, we have provided some general recommendations aimed at keeping appropriate distances between sources of air pollution and land uses such as residences.

Land use decisions are a local government responsibility. The Air Resources Board's role is advisory and these recommendations do not establish regulatory standards of any kind. However, we hope that the information in this document will be seriously considered by local elected officials and land use agencies. We also hope that this document will promote enhanced communication between land use agencies and local air pollution control agencies. We developed this document in close coordination with the California Air Pollution Control Officers Association with that goal in mind.

I hope you find this document both informative and useful.

Barbara Riordan

Mrs. Barbara Riordan
Interim Chairman
California Air Resources Board

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Acknowledgments

The ARB staff would like to acknowledge the exceptional contributions made to this document by members of the ARB Environmental Justice Stakeholders Group. Since 2001, ARB staff has consistently relied on this group to provide critical and constructive input on implementing the specifics of ARB's environmental justice policies and actions. The Stakeholders Group is convened by the ARB, and comprised of representatives from local land use and air agencies, community interest groups, environmental justice organizations, academia, and business. Their assistance and suggestions throughout the development of this Handbook have been invaluable.

Executive Summary

The Air Resources Board's (ARB) primary goal in developing this document is to provide information that will help keep California's children and other vulnerable populations out of harm's way with respect to nearby sources of air pollution. Recent air pollution studies have shown an association between respiratory and other non-cancer health effects and proximity to high traffic roadways. Other studies have shown that diesel exhaust and other cancer-causing chemicals emitted from cars and trucks are responsible for much of the overall cancer risk from airborne toxics in California. Also, ARB community health risk assessments and regulatory programs have produced important air quality information about certain types of facilities that should be considered when siting new residences, schools, day care centers, playgrounds, and medical facilities (i.e., sensitive land uses). Sensitive land uses deserve special attention because children, pregnant women, the elderly, and those with existing health problems are especially vulnerable to the non-cancer effects of air pollution. There is also substantial evidence that children are more sensitive to cancer-causing chemicals.

Focusing attention on these siting situations is an important preventative action. ARB and local air districts have comprehensive efforts underway to address new and existing air pollution sources under their respective jurisdictions. The issue of siting is a local government function. As more data on the connection between proximity and health risk from air pollution become available, it is essential that air agencies share what we know with land use agencies. We hope this document will serve that purpose.

The first section provides ARB recommendations regarding the siting of new sensitive land uses near freeways, distribution centers, rail yards, ports, refineries, chrome plating facilities, dry cleaners, and gasoline dispensing facilities. This list consists of the air pollution sources that we have evaluated from the standpoint of the proximity issue. It is based on available information and reflects ARB's primary areas of jurisdiction – mobile sources and toxic air contaminants. A key air pollutant common to many of these sources is particulate matter from diesel engines. Diesel particulate matter (diesel PM) is a carcinogen identified by ARB as a toxic air contaminant and contributes to particulate pollution statewide.

Reducing diesel particulate emissions is one of ARB's highest public health priorities and the focus of a comprehensive statewide control program that is reducing diesel PM emissions each year. ARB's long-term goal is to reduce diesel PM emissions 85% by 2020. However, cleaning up diesel engines will take time as new engine standards phase in and programs to accelerate fleet turnover or retrofit existing engines are implemented. Also, these efforts are reducing diesel particulate emissions on a statewide basis, but do not yet capture every site where diesel vehicles and engines may congregate. Because living or going to school too close to such air pollution sources may increase both cancer and non-cancer health risks, we are recommending that proximity be considered in the siting of new sensitive land uses.

There are also other key toxic air contaminants associated with specific types of facilities. Most of these are subject to stringent state and local air district regulations. However, what we know today indicates that keeping new homes and other sensitive land uses from siting too close to such facilities would provide additional health protection. Chrome platers are a prime example of facilities that should not be located near vulnerable communities because of the cancer health risks from exposure to the toxic material used during their operations.

In addition to source specific recommendations, we also encourage land use agencies to use their planning processes to ensure the appropriate separation of industrial facilities and sensitive land uses. While we provide some suggestions, how to best achieve that goal is a local issue. In the development of these guidelines, we received valuable input from local government about the spectrum of issues that must be considered in the land use planning process. This includes addressing housing and transportation needs, the benefits of urban infill, community economic development priorities, and other quality of life issues. All of these factors are important considerations. The recommendations in the Handbook need to be balanced with other State and local policies.

Our purpose with this document is to highlight the potential health impacts associated with proximity to air pollution sources so planners explicitly consider this issue in planning processes. We believe that with careful evaluation, infill development, mixed use, higher density, transit-oriented development, and other concepts that benefit regional air quality can be compatible with protecting the health of individuals at the neighborhood level. One suggestion for achieving this goal is more communication between air agencies and land use planners. Local air districts are an important resource that should be consulted regarding sources of air pollution in their jurisdictions. ARB staff will also continue to provide updated technical information as it becomes available.

Our recommendations are as specific as possible given the nature of the available data. In some cases, like refineries, we suggest that the siting of new sensitive land uses should be avoided immediately downwind. However, we leave definition of the size of this area to local agencies based on facility specific considerations. Also, project design that would reduce air pollution exposure may be part of the picture and we encourage consultation with air agencies on this subject.

In developing the recommendations, our first consideration was the adequacy of the data available for an air pollution source category. Using that data, we assessed whether we could reasonably characterize the relative exposure and health risk from a proximity standpoint. That screening provided the list of air pollution sources that we were able to address with specific recommendations. We also considered the practical implications of making hard and fast recommendations where the potential impact area is large, emissions will be reduced with time, and air agencies are in the process of looking at options for additional emission control. In the end, we tailored our recommendations to minimize the highest exposures for each source category independently. Due to the large variability in relative risk in the source categories, we chose not to apply

a uniform, quantified risk threshold as is typically done in air quality permitting programs. Instead, because these guidelines are not regulatory or binding on local agencies, we took a more qualitative approach in developing the distance-based recommendations.

Where possible, we recommend a minimum separation between a new sensitive land use and known air pollution risks. In other cases, we acknowledge that the existing health risk is too high in a relatively large area, that air agencies are working to reduce that risk, and that in the meantime, we recommend keeping new sensitive land uses out of the highest exposure areas. However, it is critical to note that our implied identification of the high exposure areas for these sources does not mean that the risk in the remaining impact area is insignificant. Rather, we hope this document will bring further attention to the potential health risk throughout the impact area and help garner support for our ongoing efforts to reduce health risk associated with air pollution sources. Areas downwind of major ports, rail yards, and other inter-modal transportation facilities are prime examples.

We developed these recommendations as a means to share important public health information. The underlying data are publicly available and referenced in this document. We also describe our rationale and the factors considered in developing each recommendation, including data limitations and uncertainties. These recommendations are advisory and should not be interpreted as defined "buffer zones." We recognize the opportunity for more detailed site-specific analyses always exists, and that there is no "one size fits all" solution to land use planning.

As California continues to grow, we collectively have the opportunity to use all the information at hand to avoid siting scenarios that may pose a health risk. As part of ARB's focus on communities and children's health, we encourage land use agencies to apply these recommendations and work more closely with air agencies. We also hope that this document will help educate a wider audience about the value of preventative action to reduce environmental exposures to air pollution.

1. ARB Recommendations on Siting New Sensitive Land Uses

Protecting California's communities and our children from the health effects of air pollution is one of the most fundamental goals of state and local air pollution control programs. Our focus on children reflects their special vulnerability to the health impacts of air pollution. Other vulnerable populations include the elderly, pregnant women, and those with serious health problems affected by air pollution. With this document, we hope to more effectively engage local land use agencies as partners in our efforts to reduce health risk from air pollution in all California communities.

Later sections emphasize the need to strengthen the connection between air quality and land use in both planning and permitting processes. Because the siting process for many, but not all air pollution sources involves permitting by local air districts, there is an opportunity for interagency coordination where the proposed location might pose a problem. To enhance the evaluation process from a land use perspective, section 4 includes recommended project related questions to help screen for potential proximity related issues.

Unlike industrial and other stationary sources of air pollution, the siting of new homes or day care centers does not require an air quality permit. Because these situations fall outside the air quality permitting process, it is especially important that land use agencies be aware of potential air pollution impacts.

The following recommendations address the issue of siting "sensitive land uses" near specific sources of air pollution; namely:

- High traffic freeways and roads
- Distribution centers
- Rail yards
- Ports
- Refineries
- Chrome plating facilities
- Dry cleaners
- Large gas dispensing facilities

The recommendations for each category include a summary of key information and guidance on what to avoid from a public health perspective.

Sensitive individuals refer to those segments of the population most susceptible to poor air quality (i.e., children, the elderly, and those with pre-existing serious health problems affected by air quality). Land uses where sensitive individuals are most likely to spend time include schools and schoolyards, parks and playgrounds, daycare centers, nursing homes, hospitals, and residential communities (sensitive sites or sensitive land uses).

We are characterizing sensitive land uses as simply as we can by using the example of residences, schools, day care centers, playgrounds, and medical facilities. However, a variety of facilities are encompassed. For example, residences can include houses, apartments, and senior living complexes. Medical facilities can include hospitals, convalescent homes, and health clinics. Playgrounds could be play areas associated with parks or community centers.

In developing these recommendations, ARB first considered the adequacy of the data available for each air pollution source category. We assessed whether we could generally characterize the relative exposure and health risk from a proximity standpoint. The documented non-cancer health risks include triggering of asthma attacks, heart attacks, and increases in daily mortality and hospitalization for heart and respiratory diseases. These health impacts are well documented in epidemiological studies, but less easy to quantify from a particular air pollution source. Therefore, the cancer health impacts are used in this document to provide a picture of relative risk. This screening process provided the list of source categories we were able to address with specific recommendations. In evaluating the available information, we also considered the practical implications of making hard and fast recommendations where the potential impact area is large, emissions will be reduced with time, and air agencies are in the process of looking at options for additional emission control. Due to the large variability in relative risk between the source categories, we chose not to apply a uniform, quantified risk threshold as is typically done in regulatory programs. Therefore, in the end, we tailored our recommendations to minimize the highest exposures for each source category independently. Additionally, because this guidance is not regulatory or binding on local agencies, we took a more qualitative approach to developing distance based recommendations.

Where possible, we recommend a minimum separation between new sensitive land uses and existing sources. However, this is not always possible, particularly where there is an elevated health risk over large geographical areas. Areas downwind of ports and rail yards are prime examples. In such cases, we recommend doing everything possible to avoid locating sensitive receptors within the highest risk zones. Concurrently, air agencies and others will be working to reduce the overall risk through controls and measures within their scope of authority.

The recommendations were developed from the standpoint of siting new sensitive land uses. Project-specific data for new and existing air pollution sources are available as part of the air quality permitting process. Where such information is available, it should be used. Our recommendations are designed to fill a gap where information about existing facilities may not be readily available. These recommendations are only guidelines and are not designed to substitute for more specific information if it exists.

A summary of our recommendations is shown in Table 1-1. The basis and references[1] supporting each of these recommendations, including health studies, air quality modeling and monitoring studies is discussed below beginning with freeways and summarized in Table 1-2. As new information becomes available, it will be included on ARB's community health web page.

[1]Detailed information on these references are available on ARB's website at: http://www.ARB.ca.gov/ch/landuse.htm.

Table 1-1

Recommendations on Siting New Sensitive Land Uses Such As Residences, Schools, Daycare Centers, Playgrounds, or Medical Facilities*

Source Category	Advisory Recommendations
Freeways and High-Traffic Roads	• Avoid siting new sensitive land uses within 500 feet of a freeway, urban roads with 100,000 vehicles/day, or rural roads with 50,000 vehicles/day.
Distribution Centers	• Avoid siting new sensitive land uses within 1,000 feet of a distribution center (that accommodates more than 100 trucks per day, more than 40 trucks with operating transport refrigeration units (TRUs) per day, or where TRU unit operations exceed 300 hours per week). • Take into account the configuration of existing distribution centers and avoid locating residences and other new sensitive land uses near entry and exit points.
Rail Yards	• Avoid siting new sensitive land uses within 1,000 feet of a major service and maintenance rail yard. • Within one mile of a rail yard, consider possible siting limitations and mitigation approaches.
Ports	• Avoid siting of new sensitive land uses immediately downwind of ports in the most heavily impacted zones. Consult local air districts or the ARB on the status of pending analyses of health risks.
Refineries	• Avoid siting new sensitive land uses immediately downwind of petroleum refineries. Consult with local air districts and other local agencies to determine an appropriate separation.
Chrome Platers	• Avoid siting new sensitive land uses within 1,000 feet of a chrome plater.
Dry Cleaners Using Perchloro-ethylene	• Avoid siting new sensitive land uses within 300 feet of any dry cleaning operation. For operations with two or more machines, provide 500 feet. For operations with 3 or more machines, consult with the local air district. • Do not site new sensitive land uses in the same building with perc dry cleaning operations.
Gasoline Dispensing Facilities	• Avoid siting new sensitive land uses within 300 feet of a large gas station (defined as a facility with a throughput of 3.6 million gallons per year or greater). A 50 foot separation is recommended for typical gas dispensing facilities.

*Notes:

- These recommendations are advisory. Land use agencies have to balance other considerations, including housing and transportation needs, economic development priorities, and other quality of life issues.

- Recommendations are based primarily on data showing that the air pollution exposures addressed here (i.e., localized) can be reduced as much as 80% with the recommended separation.
- The relative risk for these categories varies greatly (see Table 1-2). To determine the actual risk near a particular facility, a site-specific analysis would be required. Risk from diesel PM will decrease over time as cleaner technology phases in.
- These recommendations are designed to fill a gap where information about existing facilities may not be readily available and are not designed to substitute for more specific information if it exists. The recommended distances take into account other factors in addition to available health risk data (see individual category descriptions).
- Site-specific project design improvements may help reduce air pollution exposures and should also be considered when siting new sensitive land uses.
- This table does not imply that mixed residential and commercial development in general is incompatible. Rather it focuses on known problems like dry cleaners using perchloroethylene that can be addressed with reasonable preventative actions.
- A summary of the basis for the distance recommendations can be found in Table 1-2.

Table 1-2

Summary of Basis for Advisory Recommendations

Source Category	Range of Relative Cancer Risk[1,2]	Summary of Basis for Advisory Recommendations
Freeways and High-Traffic Roads	300 – 1,700	• In traffic-related studies, the additional non-cancer health risk attributable to proximity was seen within 1,000 feet and was strongest within 300 feet. California freeway studies show about a 70% drop off in particulate pollution levels at 500 feet.
Distribution Centers[3]	Up to 500	• Because ARB regulations will restrict truck idling at distribution centers, transport refrigeration unit (TRU) operations are the largest onsite diesel PM emission source followed by truck travel in and out of distribution centers. • Based on ARB and South Coast District emissions and modeling analyses, we estimate an 80 percent drop-off in pollutant concentrations at approximately 1,000 feet from a distribution center.
Rail Yards	Up to 500	• The air quality modeling conducted for the Roseville Rail Yard Study predicted the highest impact is within 1,000 feet of the Yard, and is associated with service and maintenance activities. The next highest impact is between a half to one mile of the Yard, depending on wind direction and intensity.
Ports	Studies underway	• ARB will evaluate the impacts of ports and develop a new comprehensive plan that will describe the steps needed to reduce public health impacts from port and rail activities in California. In the interim, a general advisory is appropriate based on the magnitude of diesel PM emissions associated with ports.
Refineries	Under 10	• Risk assessments conducted at California refineries show risks from air toxics to be under 10 chances of cancer per million.[4] • Distance recommendations were based on the amount and potentially hazardous nature of many of the pollutants released as part of the refinery process, particularly during non-routine emissions releases.
Chrome Platers	10-100	• ARB modeling and monitoring studies show localized risk of hexavalent chromium diminishing significantly at 300 feet. There are data limitations in both the modeling and monitoring studies. These include variability of plating activities and uncertainty of emissions such as fugitive dust. Hexavalent chromium is one of the most potent toxic air contaminants. Considering these factors, a distance of 1,000 feet was used as a precautionary measure.
Dry Cleaners Using Perchloro-ethylene (perc)	15-150	• Local air district studies indicate that individual cancer risk can be reduced by as much as 75 percent by establishing a 300 foot separation between a sensitive land use and a one-machine perc dry cleaning operation. For larger operations (2 machines or more), a separation of 500 feet can reduce risk by over 85 percent.

Source Category	Range of Relative Cancer Risk[1,2]	Summary of Basis for Advisory Recommendations
Gasoline Dispensing Facilities (GDF)[5]	Typical GDF: Less than 10 Large GDF: Between Less than 10 and 120	• Based on the CAPCOA Gasoline Service Station Industry-wide Risk Assessment Guidelines, most typical GDFs (less than 3.6 million gallons per year) have a risk of less than 10 at 50 feet under urban air dispersion conditions. Over the last few years, there has been a growing number of extremely large GDFs with sales over 3.6 and as high as 19 million gallons per year. Under rural air dispersion conditions, these large GDFs can pose a larger risk at a greater distance.

[1]For cancer health effects, risk is expressed as an estimate of the increased chances of getting cancer due to facility emissions over a 70-year lifetime. This increase in risk is expressed as chances in a million (e.g., 10 chances in a million).

[2]The estimated cancer risks are a function of the proximity to the specific category and were calculated independent of the regional health risk from air pollution. For example, the estimated regional cancer risk from air toxics in the Los Angeles region (South Coast Air Basin) is approximately 1,000 in a million.

[3]Analysis based on refrigerator trucks.

[4]Although risk assessments performed by refineries indicate they represent a low cancer risk, there is limited data on non-cancer effects of pollutants that are emitted from these facilities. Refineries are also a source of non-routine emissions and odors.

[5]A typical GDF in California dispenses under 3.6 million gallons of gasoline per year. The cancer risk for this size facility is likely to be less than 10 in a million at the fence line under urban air dispersion conditions.

A large GDF has fuel throughputs that can range from 3.6 to 19 million gallons of gasoline per year. The upper end of the risk range (i.e., 120 in a million) represents a hypothetical worst case scenario for an extremely large GDF under rural air dispersion conditions.

Freeways and High Traffic Roads

Air pollution studies indicate that living close to high traffic and the associated emissions may lead to adverse health effects beyond those associated with regional air pollution in urban areas. Many of these epidemiological studies have focused on children. A number of studies identify an association between adverse non-cancer health effects and living or attending school near heavily traveled roadways (see findings below). These studies have reported associations between residential proximity to high traffic roadways and a variety of respiratory symptoms, asthma exacerbations, and decreases in lung function in children.

One such study that found an association between traffic and respiratory symptoms in children was conducted in the San Francisco Bay Area. Measurements of traffic-related pollutants showed concentrations within 300 meters (approximately 1,000 feet) downwind of freeways were higher than regional values. Most other studies have assessed exposure based on proximity factors such as distance to freeways or traffic density.

These studies linking traffic emissions with health impacts build on a wealth of data on the adverse health effects of ambient air pollution. The data on the effects of proximity to traffic-related emissions provides additional information that can be used in land use siting and regulatory actions by air agencies. The key observation in these studies is that close proximity increases both exposure and the potential for adverse health effects. Other effects associated with traffic emissions include premature death in elderly individuals with heart disease.

Key Health Findings

- Reduced lung function in children was associated with traffic density, especially trucks, within 1,000 feet and the association was strongest within 300 feet. (Brunekreef, 1997)
- Increased asthma hospitalizations were associated with living within 650 feet of heavy traffic and heavy truck volume. (Lin, 2000)
- Asthma symptoms increased with proximity to roadways and the risk was greatest within 300 feet. (Venn, 2001)
- Asthma and bronchitis symptoms in children were associated with proximity to high traffic in a San Francisco Bay Area community with good overall regional air quality. (Kim, 2004)
- A San Diego study found increased medical visits in children living within 550 feet of heavy traffic. (English, 1999)

In these and other proximity studies, the distance from the roadway and truck traffic densities were key factors affecting the strength of the association with adverse health effects. In the above health studies, the association of traffic-related emissions with adverse health effects was seen within 1,000 feet and was

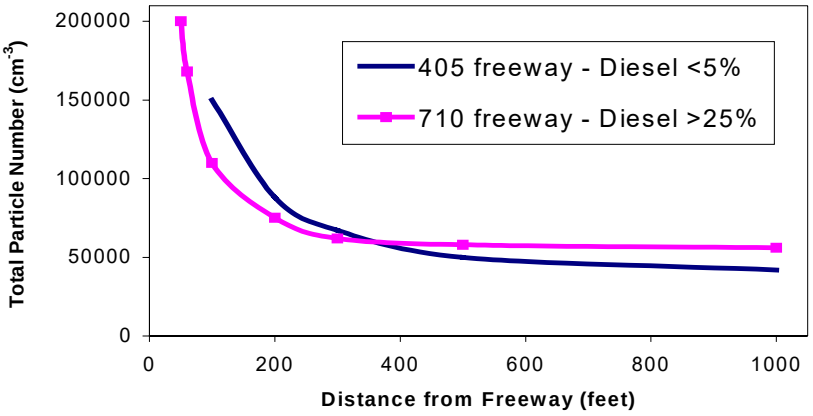
strongest within 300 feet. This demonstrates that the adverse effects diminished with distance.

In addition to the respiratory health effects in children, proximity to freeways increases potential cancer risk and contributes to total particulate matter exposure. There are three carcinogenic toxic air contaminants that constitute the majority of the known health risk from motor vehicle traffic – diesel particulate matter (diesel PM) from trucks, and benzene and 1,3-butadiene from passenger vehicles. On a typical urban freeway (truck traffic of 10,000-20,000/day), diesel PM represents about 70 percent of the potential cancer risk from the vehicle traffic. Diesel particulate emissions are also of special concern because health studies show an association between particulate matter and premature mortality in those with existing cardiovascular disease.

Distance Related Findings

A southern California study (Zhu, 2002) showed measured concentrations of vehicle-related pollutants, including ultra-fine particles, decreased dramatically within approximately 300 feet of the 710 and 405 freeways. Another study looked at the validity of using distance from a roadway as a measure of exposure

Figure 1-1
Decrease In Concentration of Freeway Diesel PM Emissions With Distance



to traffic related air pollution (Knape, 1999). This study showed that concentrations of traffic related pollutants declined with distance from the road, primarily in the first 500 feet.

These findings are consistent with air quality modeling and risk analyses done by ARB staff that show an estimated range of potential cancer risk that decreases with distance from freeways. The estimated risk varies with the local meteorology, including wind pattern. As an example, at 300 feet downwind from a freeway (Interstate 80) with truck traffic of 10,000 trucks per day, the potential cancer risk was as high as 100 in one million (ARB Roseville Rail Yard Study). The cancer health risk at 300 feet on the upwind side of the freeway was much

less. The risk at that distance for other freeways will vary based on local conditions – it may be higher or lower. However, in all these analyses the relative exposure and health risk dropped substantially within the first 300 feet. This phenomenon is illustrated in Figure 1-1.

State law restricts the siting of new schools within 500 feet of a freeway, urban roadways with 100,000 vehicles/day, or rural roadways with 50,000 vehicles with some exceptions.[2] However, no such requirements apply to the siting of residences, day care centers, playgrounds, or medical facilities. The available data show that exposure is greatly reduced at approximately 300 feet. In the traffic-related studies the additional health risk attributable to the proximity effect was strongest within 1,000 feet.

The combination of the children's health studies and the distance related findings suggests that it is important to avoid exposing children to elevated air pollution levels immediately downwind of freeways and high traffic roadways. These studies suggest a substantial benefit to a 500-foot separation.

The impact of traffic emissions is on a gradient that at some point becomes indistinguishable from the regional air pollution problem. As air agencies work to reduce the underlying regional health risk from diesel PM and other pollutants, the impact of proximity will also be reduced. In the meantime, as a preventative measure, we hope to avoid exposing more children and other vulnerable individuals to the highest concentrations of traffic-related emissions.

Recommendation

- Avoid siting new sensitive land uses within 500 feet of a freeway, urban roads with 100,000 vehicles/day, or rural roads with 50,000 vehicles/day.

References

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- Lin, S. et al. *"Childhood asthma hospitalization and residential exposure to state route traffic."* Environ Res. 2002;88:73-81
- Venn. et al. *"Living near a main road and the risk of wheezing illness in children."* American Journal of Respiratory and Critical Care Medicine. 2001; Vol.164, pp. 2177-2180
- Kim, J. et al. *"Traffic-related air pollution and respiratory health: East Bay Children's Respiratory Health Study."* American Journal of Respiratory and Critical Care Medicine 2004; Vol. 170. pp. 520-526

[2] Section 17213 of the California Education Code and section 21151.8 of the California Public Resources Code. See also Appendix E for a description of special processes that apply to school siting.

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- Knape, M. *"Traffic related air pollution in city districts near motorways."* The Science of the Total Environment. 1999; 235:339-341
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- English P., Neutra R., Scalf R. Sullivan M. Waller L. Zhu L. *"Examining Associations Between Childhood Asthma and Traffic Flow Using a Geographic Information System*." (1999) Environmental Health Perspectives 107(9): 761-767

Distribution Centers

Distribution centers or warehouses are facilities that serve as a distribution point for the transfer of goods. Such facilities include cold storage warehouses, goods transfer facilities, and inter-modal facilities such as ports. These operations involve trucks, trailers, shipping containers, and other equipment with diesel engines. A distribution center can be comprised of multiple centers or warehouses within an area. The size can range from several to hundreds of acres, involving a number of different transfer operations and long waiting periods. A distribution center can accommodate hundreds of diesel trucks a day that deliver, load, and/or unload goods up to seven days a week. To the extent that these trucks are transporting perishable goods, they are equipped with diesel-powered transport refrigeration units (TRUs) or TRU generator sets.

The activities associated with delivering, storing, and loading freight produces diesel PM emissions. Although TRUs have relatively small diesel-powered engines, in the normal course of business, their emissions can pose a significant health risk to those nearby. In addition to onsite emissions, truck travel in and out of distribution centers contributes to the local pollution impact.

ARB is working to reduce diesel PM emissions through regulations, financial incentives, and enforcement programs. In 2004, ARB adopted two airborne toxic control measures that will reduce diesel PM emissions associated with distribution centers. The first will limit nonessential (or unnecessary) idling of diesel-fueled commercial vehicles, including those entering from other states or countries. This statewide measure, effective in 2005, prohibits idling of a vehicle more than five minutes at any one location.[3] The elimination of unnecessary idling will reduce the localized impacts caused by diesel PM and other air toxics

[3] For further information on the Anti-Idling ATCM, please click on: http://www.arb.ca.gov/toxics/idling/outreach/factsheet.pdf

in diesel vehicle exhaust. This should be a very effective new strategy for reducing diesel PM emissions at distribution centers as well as other locations.

The second measure requires that TRUs operating in California become cleaner over time. The measure establishes in-use performance standards for existing TRU engines that operate in California, including out-of-state TRUs. The requirements are phased-in beginning in 2008, and extend to 2019.[4]

ARB also operates a smoke inspection program for heavy-duty diesel trucks that focuses on reducing truck emissions in California communities. Areas with large numbers of distribution centers are a high priority.

Key Health Findings

Diesel PM has been identified by ARB as a toxic air contaminant and represents 70 percent of the known potential cancer risk from air toxics in California. Diesel PM is an important contributor to particulate matter air pollution. Particulate matter exposure is associated with premature mortality and health effects such as asthma exacerbation and hospitalization due to aggravating heart and lung disease.

Distance Related Findings

Although distribution centers are located throughout the state, they are usually clustered near transportation corridors, and are often located in or near population centers. Diesel PM emissions from associated delivery truck traffic and TRUs at these facilities may result in elevated diesel PM concentrations in neighborhoods surrounding those sites. Because ARB regulations will restrict truck idling at distribution centers, the largest continuing onsite diesel PM emission source is the operation of TRUs. Truck travel in and out of distribution centers also contributes to localized exposures, but specific travel patterns and truck volumes would be needed to identify the exact locations of the highest concentrations.

As part of the development of ARB's regulation for TRUs, ARB staff performed air quality modeling to estimate exposure and the associated potential cancer risk of onsite TRUs for a typical distribution center. For an individual person, cancer risk estimates for air pollution are commonly expressed as a probability of developing cancer from a lifetime (i.e., 70 years) of exposure. These risks were calculated independent of regional risk. For example, the estimated regional cancer risk from air toxics in the Los Angeles region (South Coast Air Basin) is approximately 1,000 additional cancer cases per one million population.

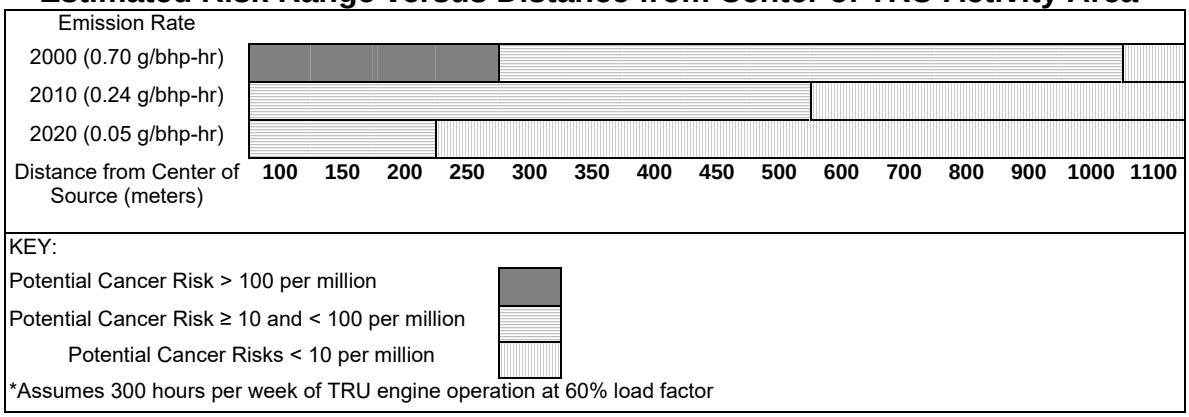
[4] For further information on the Transport Refrigeration Unit ATCM, please click on: http://www.arb.ca.gov/diesel/documents/trufaq.pdf

The diesel PM emissions from a facility are dependent on the size (horsepower), age, and number of engines, emission rates, the number of hours the truck engines and/or TRUs operate, distance, and meteorological conditions at the site. This assessment assumes a total on-site operating time for all TRUs of 300 hours per week. This would be the equivalent of 40 TRU-equipped trucks a day, each loading or unloading on-site for one hour, 12 hours a day and seven days a week.

As shown in Figure 1-2 below, at this estimated level of activity and assuming a current fleet diesel PM emission rate, the potential cancer risk would be over 100 in a million at 800 feet from the center of the TRU activity. The estimated potential cancer risk would be in the 10 to 100 per million range between 800 to 3,300 feet and fall off to less than 10 per million at approximately 3,600 feet. However with the implementation of ARB's regulation on TRUs, the risk will be significantly reduced.[5] We have not conducted a risk assessment for distribution centers based on truck traffic alone, but on an emissions basis, we would expect similar risks for a facility with truck volumes in the range of 100 per day.

Figure 1-2

Estimated Risk Range versus Distance from Center of TRU Activity Area*

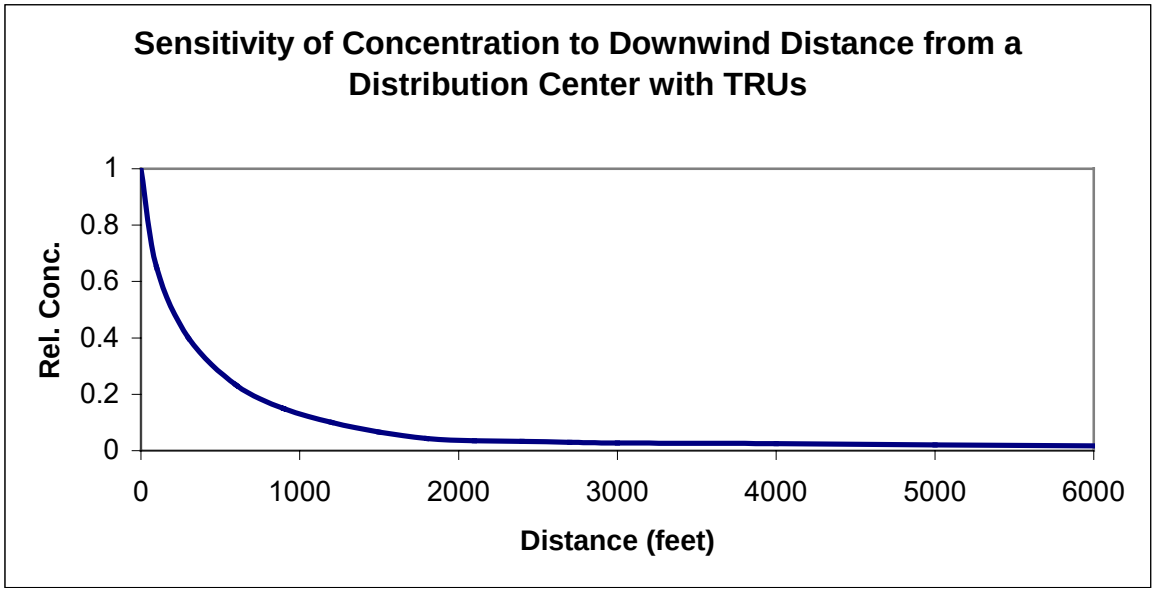


The estimated potential cancer risk level in Figure 1-2 is based on a number of assumptions that may not reflect actual conditions for a specific site. For example, increasing or decreasing the hours of diesel engine operations would change the potential risk levels. Meteorological and other facility specific parameters can also impact the results. Therefore, the results presented here are not directly applicable to any particular facility or operation. Rather, this information is intended to provide an indication as to the potential relative levels of risk that may be observed from operations at distribution centers. As shown in Figure 1-2, the estimated risk levels will decrease over time as lower-emitting diesel engines are used.

[5] These risk values assume an exposure duration of 70 years for a nearby resident and uses the methodology specified in the 2003 OEHHA health risk assessment guidelines.

Another air modeling analysis, performed by the South Coast Air Quality Management District (South Coast AQMD), evaluated the impact of diesel PM emissions from distribution center operations in the community of Mira Loma in southern California. Based on dispersion of diesel PM emissions from a large distribution center, Figure 1-3 shows the relative pollution concentrations at varying distances downwind. As Figure 1-3 shows, there is about an 80 percent drop off in concentration at approximately 1,000 feet.

Figure 1-3
Decrease In Relative Concentration of Risk With Distance



Both the ARB and the South Coast AQMD analyses indicate that providing a separation of 1,000 feet would substantially reduce diesel PM concentrations and public exposure downwind of a distribution center. While these analyses do not provide specific risk estimates for distribution centers, they provide an indication of the range of risk and the benefits of providing a separation. ARB recommends a separation of 1,000 feet based on the combination of risk analysis done for TRUs and the decrease in exposure predicted with the South Coast AQMD modeling. However, ARB staff plans to provide further information on distribution centers as we collect more data and implement the TRU control measure.

Taking into account the configuration of distribution centers can also reduce population exposure and risk. For example, locating new sensitive land uses away from the main entry and exit points helps to reduce cancer risk and other health impacts.

Recommendations

- Avoid siting new sensitive land uses within 1,000 feet of a distribution center (that accommodates more than 100 trucks per day, more than 40 trucks with operating TRUs per day, or where TRU unit operations exceed 300 hours per week).

- Take into account the configuration of existing distribution centers and avoid locating residences and other new sensitive land uses near entry and exit points.

References

- *Airborne Toxic Control Measure To Limit Diesel-Fueled Commercial Motor Vehicle Idling.* ARB (August 20, 2004). Rule effectiveness date awaiting submittal of regulation to the Office of Administration Law. http://www.arb.ca.gov/regact/idling/idling.htm

- *Revised Staff Report: Initial Statement of Reasons for Proposed Rulemaking. Airborne Toxic Control Measure for In-Use Diesel-Fueled Transport Refrigeration Units (TRU) and TRU Generator Sets, and Facilities Where TRUs Operate.* ARB (October 28, 2003). http://www.arb.ca.gov/regact/trude03/revisor.doc

- *Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis.* SCAQMD (August 2003) http://www.aqmd.gov/ceqa/handbook/diesel_analysis.doc

- *"Mira Loma Study: Analysis of the Impact of Diesel Particulate Emissions from Warehouse/Distribution Center Operations",* PowerPoint presentation. SCAQMD (July 31, 2002)

Rail Yards

Rail yards are a major source of diesel particulate air pollution. They are usually located near inter-modal facilities, which attract heavy truck traffic, and are often sited in mixed industrial and residential areas. ARB, working with the Placer County air district and Union Pacific Railroad, recently completed a study[6] of the Roseville Rail Yard (Yard) in northern California that focused on the health risk from diesel particulate. A comprehensive emissions analysis and air quality modeling were conducted to characterize the estimated potential cancer risk associated with the facility.

[6] To review the study, please click on: http://www.arb.ca.gov/diesel/documents/rrstudy.htm

The Yard encompasses about 950 acres on a one-quarter mile wide by four-mile long strip of land that parallels Interstate 80. It is surrounded by commercial, industrial, and residential properties. The Yard is one of the largest service and maintenance rail yards in the West with over 30,000 locomotives visiting annually.

Using data provided by Union Pacific Railroad, the ARB determined the number and type of locomotives visiting the Yard annually and what those locomotives were doing - moving, idling, or undergoing maintenance testing. Union Pacific provided the annual, monthly, daily, and hourly locomotive activity in the yard including locomotive movements; routes for arrival, departure, and through trains; and locomotive service and testing. This information was used to estimate the emissions of particulate matter from the locomotives, which was then used to model the potential impacts on the surrounding community.

The key findings of the study are:

- Diesel PM emissions in 2000 from locomotive operations at the Roseville Yard were estimated at about 25 tons per year.

- Of the total diesel PM in the Yard, moving locomotives accounted for about 50 percent, idling locomotives about 45 percent, and locomotive testing about five percent.

- Air quality modeling predicts potential cancer risks greater than 500 in a million (based on 70 years of exposure) in a 10-40 acre area immediately adjacent to the Yard's maintenance operations.

- The risk assessment also showed elevated cancer risk impacting a larger area covering about a 10 by 10 mile area around the Yard.

The elevated concentrations of diesel PM found in the study contribute to an increased risk of cancer and premature death due to cardiovascular disease, and non-cancer health effects such as asthma and other respiratory illnesses. The magnitude of the risk, the general location, and the size of the impacted area depended on the meteorological data used to characterize conditions at the Yard, the dispersion characteristics, and exposure assumptions. In addition to these variables, the nature of locomotive activity will influence a risk characterization at a particular rail yard. For these reasons, the quantified risk estimates in the Roseville Rail Yard Study cannot be directly applied to other rail yards. However, the study does indicate the health risk due to diesel PM from rail yards needs to be addressed. ARB, in conjunction with the U.S. Environmental Protection Agency (U.S. EPA), and local air districts, is working with the rail industry to identify and implement short term, mid-term and long-term mitigation strategies. ARB also intends to conduct a second rail study in southern California to increase its understanding of rail yard operations and the associated public health impacts.

Key Health Findings

Diesel PM has been identified by ARB as a toxic air contaminant and represents 70 percent of the known potential cancer risk from air toxics in California. Diesel PM is an important contributor to particulate matter air pollution. Particulate matter exposure is associated with premature mortality and health effects such as asthma exacerbation and hospitalization due to aggravating heart and lung disease.

Distance Related Findings

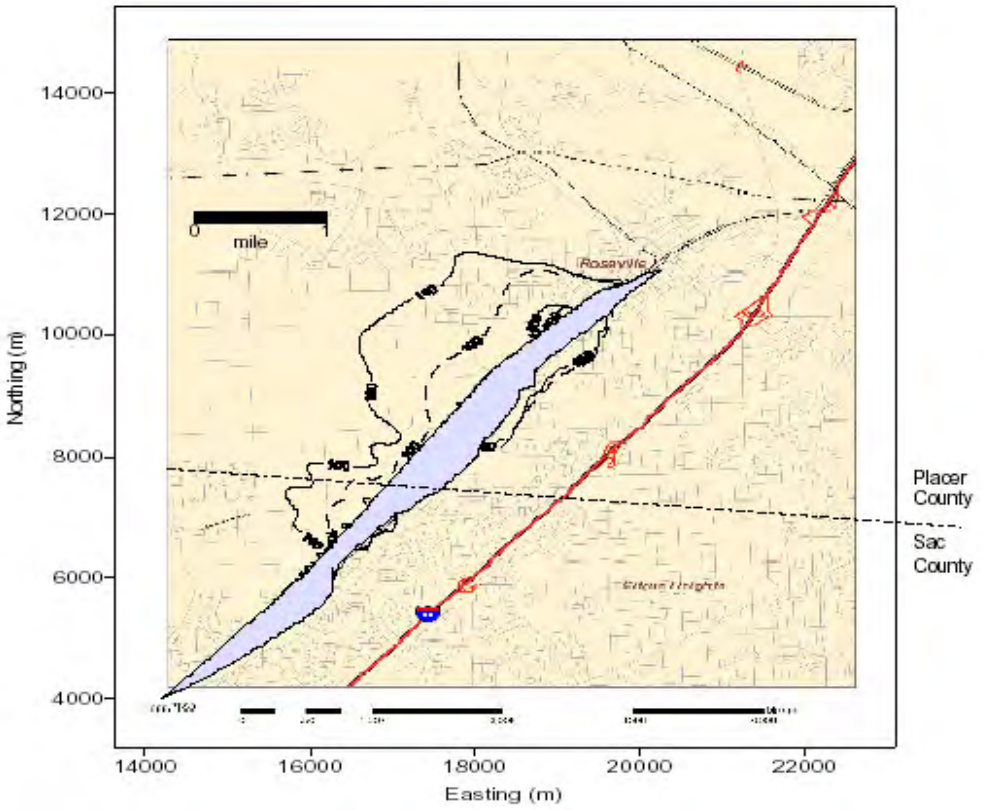
Two sets of meteorological data were used in the Roseville study because of technical limitations in the data. The size of the impact area was highly dependent on the meteorological data set used. The predicted highest impact area ranged from 10 - 40 acres with the two different meteorological data sets. This area, with risks estimated above 500 in a million, is adjacent to an area that includes a maintenance shop (see Figure 1-4). The high concentration of diesel PM emissions is due to the number of locomotives and nature of activities in this area, particularly idling locomotives.

The area of highest impact is within 1,000 feet of the Yard. The next highest impact zone as defined in the report had a predicted risk between 500 and 100 in one million and extends out between a half to one mile in some spots, depending on which meteorological conditions were assumed. The impact areas are irregular in shape making it difficult to generalize about the impact of distance at a particular location. However, the Roseville Rail Yard Study clearly indicates that the localized health risk is high, the impact area is large, and mitigation of the locomotive diesel PM emissions is needed.

For facilities like rail yards and ports, the potential impact area is so large that the real solution is to substantially reduce facility emissions. However, land use planners can avoid encroaching upon existing rail facilities and those scheduled for expansion. We also recommend that while air agencies tackle this problem, land use planners try not to add new sensitive individuals into the highest exposure areas. Finally, we recommend that land use agencies consider the potential health impacts of rail yards in their planning and permitting processes. Additional limitations and mitigation may be feasible to further reduce exposure on a site-specific basis.

Figure 1-4

Estimated Cancer Risk from the Yard
(100 and 500 in a million risk isopleths)



Notes: 100/Million Contours: Solid Line – Roseville Met Data; Dashed Line-McClellan Met Data, Urban Dispersion Coefficients, 80th Percentile Breathing Rate, All Locomotives' Activities (23 TPY), 70-Year Exposure

Recommendation

- Avoid siting new sensitive land uses within 1,000 feet of a major service and maintenance rail yard[7].

- Within one mile of a rail yard, consider possible siting limitations and mitigation approaches.

References

- *Roseville Rail Yard Study.* ARB (2004)

[7] The rail yard risk analysis was conducted for the Union Pacific rail yard in Roseville, California. This rail yard is one of the largest in the state. There are other rail yards in California with comparable levels of activity that should be considered "major" for purposes of this Handbook.

Ports

Air pollution from maritime port activities is a growing concern for regional air quality as well as air quality in nearby communities. The primary air pollutant associated with port operations is directly emitted diesel particulate. Port-related activities also result in emissions that form ozone and secondary particulate in the atmosphere. The emission sources associated with ports include diesel engine-powered ocean-going ships, harbor craft, cargo handling equipment, trucks, and locomotives. The size and concentration of these diesel engines makes ports one of the biggest sources of diesel PM in the state. For that reason, ARB has made it a top priority to reduce diesel PM emissions at the ports, in surrounding communities, and throughout California.

International, national, state, and local government collaboration is critical to reducing port emissions based on both legal and practical considerations. For example, the International Maritime Organization (IMO) and the U.S. EPA establish emission standards for ocean-going vessels and U.S.-flagged harbor craft, respectively. ARB is pursuing further federal actions to tighten these standards. In addition, ARB and local air districts are reducing emissions from ports through a variety of approaches. These include: incentive programs to fund cleaner engines, enhanced enforcement of smoke emissions from ships and trucks, use of dockside electricity instead of diesel engines, cleaner fuels for ships, harbor craft, locomotives, and reduced engine idling. The two ATCMs that limit truck idling and reduce emissions from TRUs (discussed under “Distribution Centers”) also apply to ports.

ARB is also developing several other regulations that will reduce port-related emissions. One rule would require ocean-going ships to use a cleaner marine diesel fuel to power auxiliary engines while in California coastal waters and at dock. Ships that frequently visit California ports would also be required to further reduce their emissions. ARB has adopted a rule that would require harbor craft to use the same cleaner diesel fuel used by on-road trucks in California. In 2005, ARB will consider a rule that would require additional controls for in-use harbor craft, such as the use of add-on emission controls and accelerated turnover of older engines.

Key Health Findings

Port activities are a major source of diesel PM. Diesel PM has been identified by ARB as a toxic air contaminant and represents 70 percent of the known potential cancer risk from air toxics in California. Diesel PM is an important contributor to particulate matter air pollution. Particulate matter exposure is associated with premature mortality and health effects such as asthma exacerbation and hospitalization due to aggravating heart and lung disease.

Distance Related Findings

The Ports of Los Angeles and Long Beach provide an example of the emissions impact of port operations. A comprehensive emissions inventory was completed in June 2004. These ports combined are one of the world's largest and busiest seaports. Located in San Pedro Bay, about 20 miles south of downtown Los Angeles, the port complex occupies approximately 16 square miles of land and water. Port activities include five source categories that produce diesel emissions. These are ocean-going vessels, harbor craft, cargo handling equipment, railroad locomotives, and heavy-duty trucks.

The baseline emission inventory provides emission estimates for all major air pollutants. This analysis focuses on diesel PM from in-port activity because these emissions have the most potential health impact on the areas adjacent to the port. Ocean vessels are the largest overall source of diesel PM related to the ports, but these emissions occur primarily outside of the port in coastal waters, making the impact more regional in nature.

The overall in-port emission inventory for diesel particulate for the ports of Los Angeles and Long Beach is estimated to be 550 tons per year. The emissions fall in the following major categories: ocean-going vessels (17%), harbor craft (25%), cargo handling (47%), railroad locomotive (3%), and heavy duty vehicles (8%). In addition to in-port emissions, ship, rail, and trucking activities also contribute to regional emissions and increase emissions in nearby neighborhoods. Off-port emissions associated with related ship, rail, and trucking activities contribute an additional 680 tons per year of diesel particulate at the Port of Los Angeles alone.

To put this in perspective, the diesel PM emissions estimated for the Roseville Yard in ARB's 2004 study are 25 tons per year. The potential cancer risk associated with these emissions is 100 in one million at a distance of one mile, or one half mile, depending on the data set used. This rail yard covers one and a half square miles. The Los Angeles and Long Beach ports have combined diesel PM emissions of 550 tons per year emitted from a facility that covers a much larger area - 16 miles. The ports have about twice the emission density of the rail yard - 34 tons per year per square mile compared to 16 tons per year per square mile. However, while this general comparison is illustrative of the overall size of the complex, a detailed air quality modeling analysis would be needed to assess the potential health impact on specific downwind areas near the ports.

ARB is in the process of evaluating the various port-related emission sources from the standpoint of existing emissions, growth forecasts, new control options, regional air quality impacts, and localized health risk. A number of public processes - both state and local - are underway to address various aspects of these issues. Until more of these analyses are complete, there is little basis for recommending a specific separation between new sensitive land uses and ports.

For example, the type of data we have showing the relationship between air pollutant concentrations and distance from freeways is not yet available.

Also, the complexity of the port facilities makes a site-specific analysis critical. Ports are a concentration of multiple emission sources with differing dispersion and other characteristics. In the case of the Roseville rail yard, we found a high, very localized impact associated with a particular activity, service and maintenance. By contrast, the location, size, and nature of impact areas can be expected to vary substantially for different port activities. For instance, ground level emissions from dockside activities would behave differently from ship stack level emissions.

Nonetheless, on an emissions basis alone, we expect locations downwind of ports to be substantially impacted. For that reason, we recommend that land use agencies track the current assessment efforts, and consider limitations on the siting of new sensitive land uses in areas immediately downwind of ports.

Recommendations

Avoid siting new sensitive land uses immediately downwind of ports in the most heavily impacted zones. Consult local air districts or the ARB on the status of pending analyses of health risks.

References

- *Roseville Rail Yard Study.* ARB (2004)
- Final Draft, "*Port-Wide Baseline Air Emissions Inventory."* Port of Los Angeles (June 2004)
- Final Draft, "*2002 Baseline Air Emissions Inventory."* Port of Long Beach (February 2004)

Petroleum Refineries

A petroleum refinery is a complex facility where crude oil is converted into petroleum products (primarily gasoline, diesel fuel, and jet fuel), which are then transported through a system of pipelines and storage tanks for final distribution by delivery truck to fueling facilities throughout the state. In California, most crude oil is delivered either by ship from Alaska or foreign sources, or is delivered via pipeline from oil production fields within the state. The crude oil then undergoes many complex chemical and physical reactions, which include distillation, catalytic cracking, reforming, and finishing. These refining processes have the potential to emit air contaminants, and are subject to extensive emission controls by district regulations.

As a result of these regulations covering the production, marketing, and use of gasoline and other oil by-products, California has seen significant regional air quality benefits both in terms of cleaner fuels and cleaner operating facilities. In

the 1990s, California refineries underwent significant modifications and modernization to produce cleaner fuels in response to changes in state law. Nevertheless, while residual emissions are small when compared to the total emissions controlled from these major sources, refineries are so large that even small amounts of fugitive, uncontrollable emissions and associated odors from the operations, can be significant. This is particularly the case for communities that may be directly downwind of the refinery. Odors can cause health symptoms such as nausea and headache. Also, because of the size, complexity, and vast numbers of refinery processes onsite, the occasional refinery upset or malfunction can potentially result in acute or short-term health effects to exposed individuals.

Key Health Findings

Petroleum refineries are large single sources of emissions. For volatile organic compounds (VOCs), eight of the ten largest stationary sources in California are petroleum refineries. For oxides of nitrogen (NOx), four of the ten largest stationary sources in California are petroleum refineries. Both of these compounds react in the presence of sunlight to form ozone. Ozone impacts lung function by irritating and damaging the respiratory system. Petroleum refineries are also large stationary sources of both particulate matter under 10 microns in size (PM_{10}) and particulate matter under 2.5 microns in size ($PM_{2.5}$). Exposure to particulate matter aggravates a number of respiratory illnesses, including asthma, and is associated with premature mortality in people with existing cardiac and respiratory disease. Both long-term and short-term exposure can have adverse health impacts. Finer particles pose an increased health risk because they can deposit deep in the lung and contain substances that are particularly harmful to human health. NOx are also significant contributors to the secondary formation of $PM_{2.5}$.

Petroleum refineries also emit a variety of toxic air pollutants. These air toxics vary by facility and process operation but may include: acetaldehyde, arsenic, antimony, benzene, beryllium, 1,3-butadiene, cadmium compounds, carbonyl sulfide, carbon disulfide, chlorine, dibenzofurans, diesel particulate matter, formaldehyde, hexane, hydrogen chloride, lead compounds, mercury compounds, nickel compounds, phenol, 2,3,7,8 tetrachlorodibenzo-p-dioxin, toluene, and xylenes (mixed) among others. The potential health effects associated with these air toxics can include cancer, respiratory irritation, and damage to the central nervous system, depending on exposure levels.

Distance Related Findings

Health risk assessments for petroleum refineries have shown risks from toxic air pollutants that have quantifiable health risk values to be around 10 potential cancer cases per million. Routine air monitoring and several air monitoring studies conducted in the San Francisco Bay Area (Crockett) and the South Coast Air Basin (Wilmington) have not identified significant health risks specifically

associated with refineries. However, these studies did not measure diesel PM as no accepted method currently exists, and there are many toxic air pollutants that do not have quantifiable health risk values.

In 2002, ARB published a report on the results of the state and local air district air monitoring done near oil refineries. The purpose of this evaluation was to try to determine how refinery-related emissions might impact nearby communities. This inventory of air monitoring activities included 10 ambient air monitoring stations located near refineries in Crockett and four stations near refineries in Wilmington. These monitoring results did not identify significant increased health risks associated with the petroleum refineries. In 2002-2003, ARB conducted additional monitoring studies in communities downwind of refineries in Crockett and Wilmington. These monitoring results also did not indicate significant increased health risks from the petroleum refineries.

Consequently, there are no air quality modeling or air monitoring data that provides a quantifiable basis for recommending a specific separation between refineries and new sensitive land uses. However, in view of the amount and potentially hazardous nature of many of the pollutants released as part of the refinery process, we believe the siting of new sensitive land uses immediately downwind should be avoided. Land use agencies should consult with the local air district when considering how to define an appropriate separation for refineries within their jurisdiction.

Recommendations

- Avoid siting new sensitive land uses immediately downwind of petroleum refineries. Consult with local air districts and other local agencies to determine an appropriate separation.

References

- *Review of Current Ambient Air Monitoring Activities Related to California Bay Area and South Coast Refineries. ARB (March 2002)* http://www.arb.ca.gov/aaqm/qmosqual/special/mldrefinery.pdf
- *Community Air Quality Monitoring: Special Studies – Crockett. ARB (September 2004)* http://www.arb.ca.gov/ch/communities/studies/crockett/crockett.htm
- *Wilmington Study - Air Monitoring Results. ARB (2003)* http://www.arb.ca.gov/ch/communities/studies/wilmington/wilmington.htm

Chrome Plating Operations

Chrome plating operations rely on the use of the toxic metal hexavalent chromium, and have been subject to ARB and local air district control programs for many years. Regulation of chrome plating operations has reduced statewide emissions substantially. However, due to the nature of chrome plating

operations and the highly toxic nature of hexavalent chromium, the remaining health risk to nearby residents is a continuing concern.

Chrome plating operations convert hexavalent chromium in solution to a chromium metal layer by electroplating, and are categorized based upon the thickness of the chromium metal layer applied. In “decorative plating”, a layer of nickel is first plated over a metal substrate. Following this step, a thin layer of chromium is deposited over the nickel layer to provide a decorative and protective finish, for example, on faucets and automotive wheels. “Hard chrome plating” is a process in which a thicker layer of chromium metal is deposited directly on metal substrates such as engine parts, industrial machinery, and tools to provide greater protection against corrosion and wear.

Hexavalent chromium is emitted into the air when an electric current is applied to the plating bath. Emissions are dependent upon the amount of electroplating done per year and the control requirements. A unit of production referred to as an ampere-hour represents the amount of electroplating produced. Small facilities have an annual production rate of 100,000 – 500,000 ampere-hours, while medium-size facilities may have a production rate of 500,000 to about 3 million ampere-hours. The remaining larger facilities have a range of production rates that can be as high as 80 million ampere-hours.

The control requirements, which reduce emissions from the plating tanks, vary according to the size and type of the operation. Facilities either install add-on pollution control equipment, such as filters and scrubbers, or in-tank controls, such as fume suppressants and polyballs. With this combination of controls, the overall hexavalent chromium emissions have been reduced by over 90 percent. Larger facilities typically have better controls that can achieve efficiencies greater than 99 percent. However, even with stringent controls, the lack of maintenance and good housekeeping practices can lead to problems. And, since the material itself is inherently dangerous, any lapse in compliance poses a significant risk to nearby residents.

A 2002 ARB study in the San Diego community of Barrio Logan measured unexpectedly high concentrations of hexavalent chromium near chrome platers. The facilities were located in a mixed-use area with residences nearby. The study found that fugitive dust laden with hexavalent chromium was an important source of emissions that likely contributed to the elevated cancer risk. Largely as a result of this study, ARB is in the process of updating the current requirements to further reduce the emissions from these facilities.

In December 2004, the ARB adopted an ATCM to reduce emissions of hexavalent chromium and nickel from thermal spraying operations through the installation of best available control technology. The ATCM requires all existing facilities to comply with its requirements by January 1, 2006. New and modified thermal spraying operations must comply upon initial startup. An existing thermal spraying facility may be exempt from the minimum control efficiency

requirements of the ATCM if it is located at least 1,640 feet from the nearest sensitive receptor and emits no more than 0.5 pound per year of hexavalent chromium.[8]

Key Health Findings

Hexavalent chromium is one of the most toxic air pollutants regulated by the State of California. Hexavalent chromium is a carcinogen and has been identified in worker health studies as causing lung cancer. Exposure to even very low levels of hexavalent chromium should be avoided.

The California Office of Environmental Health Hazard Assessment has found that: 1) many epidemiological studies show a strong association between hexavalent chromium exposure in the work place and respiratory cancer; and 2) all short-term assays reported show that hexavalent chromium compounds can cause damage to human DNA.

Hexavalent chromium when inhaled over a period of many years can cause a variety of non-cancer health effects. These health effects include damage to the nose, blood disorders, lung disease, and kidney damage. The non-cancer health impacts occur with exposures considerably higher than exposures causing significant cancer risks. It is less likely that the public would be exposed to hexavalent chromium at levels high enough to cause these non-cancer health effects. Non-cancer health effects, unlike cancer health effects, have a threshold or exposure level below which non-cancer health effects would not be expected.

Distance Related Findings

ARB's 2002 Barrio Logan Study measured concentrations of hexavalent chromium in the air near two chrome plating facilities. The study was conducted from December 2001 to May 2002. There were two chrome platers on the street - one decorative and one hard plater. The purpose of the study was to better understand the near source impact of hexavalent chromium emissions. Air monitors were placed at residences next to the platers and at varying distances down the street. The monitors were moved periodically to look at the spatial distribution of the impact. Source testing and facility inspections identified one of the facilities as the likely source.

The first two weeks of monitoring results showed unexpectedly high levels of hexavalent chromium at a number of the monitoring sites. The high concentrations were intermittent. The concentrations ranged from 1 to 22 ng/m3 compared to the statewide average of 0.1 ng/m3. If these levels were to continue for 70 years, the potential cancer risk would be 150 in one million. The highest value was found at an air monitor behind a house adjacent to one of the

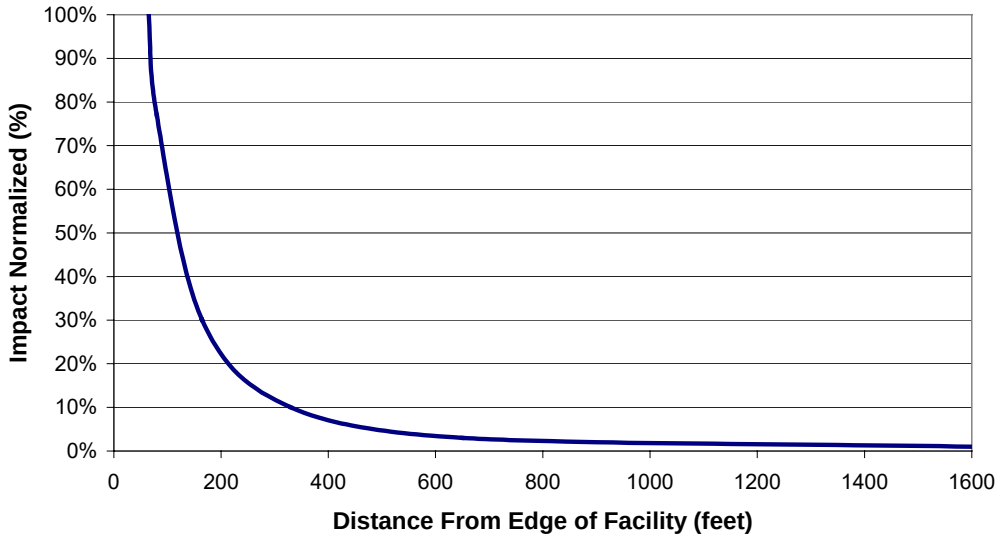
[8] For further information on the ATCM, please refer to: http://www.arb.ca.gov/regact/thermspr/thermalspr.htm

plating facilities–approximately 30 feet from the back entrance. Lower, but significant concentrations were found at an ambient air monitor 250 feet away.

The monitoring covered a period when the facility was not operating its plating tank. During this period, one of the highest concentrations was measured at an adjacent house. It appears that chromium-laden dust was responsible for high concentrations at this location since there was no plating activity at the time. Dust samples from the facility were tested and found to contain high levels of hexavalent chromium. On the day the highest concentration was measured at the house next door, a monitor 350 feet away from the plater's entrance showed very little impact. Similar proximity effects are shown in ARB modeling studies.

Figure 1-5 shows how the relative health risk varies as a function of distance from a chrome plater. This analysis is based on a medium-sized chrome plater with an annual production rate of 3 million ampere-hours. As shown in Figure 1- 5, the potential health risk drops off rapidly, with over 90 percent reduction in risk within 300 feet. This modeling was done in 2003 as part of a review of ARB's current air toxic control measure for chrome platers and is based on data from a recent ARB survey of chrome platers in California. The emission

Figure 1-5
Risk vs. Distance From Chrome Plater
(Based on plating tank emissions)



rates are only for plating operations. Because there are insufficient data available to directly quantify the impacts, the analysis does not include fugitive emissions, which the Barrio Logan analysis indicated could be significant.

Both the ARB Barrio Logan monitoring results and ARB's 2003 modeling analysis suggests that the localized emissions impact of a chrome plater diminishes significantly at 300 feet. However, in developing our recommendation, we also considered the following factors:

- some chrome platers will have higher volumes of plating activity,
- potential dust impacts were not modeled,
- we have only one monitoring study looking at the impact of distance, and,
- hexavalent chromium is one of the most potent toxic air contaminants ARB has identified.

Given these limitations in the analysis, we recommend a separation of 1,000 feet as a precautionary measure. For large chrome platers, site specific information should be obtained from the local air district.

Recommendation

- Avoid siting new sensitive land uses within 1,000 feet of a chrome plater.

References

- *Ambient Air Monitoring for Hexavalent Chromium and Metals in Barrio Logan: May 2001 through May 2002.* ARB, Monitoring and Laboratory Division (October 14, 2003)
- *Draft Barrio Logan Report.* ARB, Planning and Technical Support Division (November 2004)
- *Proposed Amendments to the Hexavalent Chromium Control Measure for Decorative and Hard Chrome Plating and Chromic Acid Anodizing Facilities.* ARB (April 1998)
- Murchison, Linda; Suer, Carolyn; Cook, Jeff. *"Neighborhood Scale Monitoring in Barrio Logan," (*AWMA Annual Conference Proceedings, June 2003)

Dry Cleaners Using Perchloroethylene (Perc Dry Cleaners)

Perchloroethylene (perc) is the solvent most commonly used by the dry cleaning industry to clean clothes or other materials. The ARB and other public health agencies have identified perc as a potential cancer-causing compound. Perc persists in the atmosphere long enough to contribute to both regional air pollution and localized exposures. Perc dry cleaners are the major source of perc emissions in California.

Since 1990, the statewide concentrations and health risk from exposure to perc has dropped over 70 percent. This is due to a number of regulatory requirements on perc dry cleaners and other sources, including degreasing operations, brake cleaners, and adhesives. ARB adopted an Airborne Toxic Control Measure (ATCM) for Perc Emissions from Dry Cleaning Operations in 1993. ARB has also prohibited the use of perc in aerosol adhesives and automotive brake cleaners.

Perc dry cleaners statewide are required to comply with ARB and local air district regulations to reduce emissions. However, even with these controls, some emissions continue to occur. Air quality studies indicate that there is still the potential for significant risks even near well-controlled dry cleaners. The South Coast AQMD has adopted a rule requiring that all new dry cleaners use alternatives to perc and that existing dry cleaners phase out the use of perc by December 2020. Over time, transition to non-toxic alternatives should occur. However, while perc continues to be used, a preventative approach should be taken to siting of new sensitive land uses.

Key Health Findings

Inhalation of perc may result in both cancer and non-cancer health effects. An assessment by California's Office of Environmental Health Hazard Assessment (OEHHA) concluded that perc is a potential human carcinogen and can cause non-cancer health effects. In addition to the potential cancer risk, the effects of long-term exposure include dizziness, impaired judgment and perception, and damage to the liver and kidneys. Workers have shown signs of liver toxicity following chronic exposure to perc, as well as kidney dysfunction and neurological effects. Non-cancer health effects occur with higher exposure levels than those associated with significant cancer risks. The public is more likely to be exposed to perchloroethylene at levels causing significant cancer risks than to levels causing non-cancer health effects. Non-cancer health effects, unlike cancer health effects, have a threshold or exposure level below which non-cancer health effects would not be expected. The ARB formally identified perc as a toxic air contaminant in October 1991.

One study has determined that inhalation of perc is the predominant route of exposure to infants living in apartments co-located in the same building with a business operating perc dry cleaning equipment. Results of air sampling within co-residential buildings indicate that dry cleaners can cause a wide range of exposures depending on the type and maintenance of the equipment. For example, a well-maintained state-of-the-art system may have risks in the range of 10 in one million, whereas a badly maintained machine with major leaks can have potential cancer risks of thousands in one million.

The California Air Pollution Control Officers Association (CAPCOA) is developing Industry-wide Risk Assessment Guidelines for Perchloroethylene Dry Cleaners which, when published, will provide detailed information on public health risk from exposure to emissions from this source.

Distance Related Findings

Risk created by perc dry cleaning is dependent on the amount of perc emissions, the type of dry cleaning equipment, proximity to the source, and how the emissions are released and dispersed (e.g., type of ventilation system, stack parameters, and local meteorology). Dry cleaners are often located near

residential areas, and near shopping centers, schools, day-care centers, and restaurants.

The vast majority of dry cleaners in California have one dry cleaning machine per facility. The South Coast AQMD estimates that an average well-controlled dry cleaner uses about 30 to 160 gallons of cleaning solvent per year, with an average of about 100 gallons. Based on these estimates, the South Coast AQMD estimates a potential cancer risk between 25 to 140 in one million at residential locations 75 feet or less from the dry cleaner, with an average of about 80 in one million. The estimate could be as high as 270 in one million for older machines.

CAPCOA's draft industry-wide risk assessment of perc dry cleaning operations indicates that the potential cancer risk for many dry cleaners may be in excess of potential cancer risk levels adopted by the local air districts. The draft document also indicates that, in general, the public's exposure can be reduced by at least 75 percent, by providing a separation distance of about 300 feet from the operation. This assessment is based on a single machine with perc use of about 100 gallons per year. At these distances, the potential cancer risk would be less than 10 potential cases per million for most scenarios.

The risk would be proportionately higher for large, industrial size, dry cleaners. These facilities typically have two or more machines and use 200 gallons or more per year of perc. Therefore, separation distances need to be greater for large dry cleaners. At a distance of 500 feet, the remaining risk for a large plant can be reduced by over 85 percent.

In California, a small number of dry cleaners that are co-located (sharing a common wall, floor, or ceiling) with a residence have the potential to expose the inhabitants of the residence to high levels of perc. However, while special requirements have been imposed on these existing facilities, the potential for exposure still exists. Avoiding these siting situations in the future is an important preventative measure.

Local air districts are a source of information regarding specific dry cleaning operations—particularly for large industrial operations with multiple machines. The 300 foot separation recommended below reflects the most common situation – a dry cleaner with only one machine. While we recommend 500 feet when there are two or more machines, site specific information should be obtained from the local air district for some very large industrial operations. Factors that can impact the risk include the number and type of machines, controls used, source configuration, building dimensions, terrain, and meteorological data.

Recommendation

- Avoid siting new sensitive land uses within 300 feet of any dry cleaning operation. For operations with two or more machines provide 500 feet. For operations with 3 or more machines, consult with the local air district.

- Do not site new sensitive land uses in the same building with perc dry cleaning operations.

References

- *Proposed Amended Rule 1421 – Control of Perchloroethylene Emissions from Dry Cleaning Systems,* Final Staff Report. South Coast AQMD. (October 2002)
- *Air Toxic Control Measure for Emissions of Perchloroethylene from Dry Cleaning Operations.* ARB (1994) (http://www.arb.ca.gov/toxics/atcm/percatcm.htm)
- *"An Assessment of Tetrachloroethylene in Human Breast Milk"*, Judith Schreiber, New York State Department of Health – Bureau of Toxic Substance Assessment, Journal of Exposure Analysis and Environmental Epidemiology, Vol.2, Suppl.2, pp. 15-26, 1992.
- Draft *Air Toxics "Hot Spots" Program Perchloroethylene Dry Cleaner Industry-wide Risk Assessment Guidelines.* (CAPCOA (November 2002)
- *Final Environmental Assessment for Proposed Amended Rule 1421 – Control of Perchloroethylene Emissions from Dry Cleaning Systems.* South Coast AQMD. (October 18, 2002)

Gasoline Dispensing Facilities

Refueling at gasoline dispensing facilities releases benzene into the air. Benzene is a potent carcinogen and is one of the highest risk air pollutants regulated by ARB. Motor vehicles and motor vehicle-related activity account for over 90 percent of benzene emissions in California. While gasoline-dispensing facilities account for a small part of total benzene emissions, near source exposures for large facilities can be significant.

Since 1990, benzene in the air has been reduced by over 75 percent statewide, primarily due to the implementation of emissions controls on motor vehicle vapor recovery equipment at gas stations, and a reduction in benzene levels in gasoline. However, benzene levels are still significant. In urban areas, average benzene exposure is equivalent to about 50 in one million.

Gasoline dispensing facilities tend to be located in areas close to residential and shopping areas. Benzene emissions from the largest gas stations may result in near source health risk beyond the regional background and district health risk thresholds. The emergence of very high gasoline throughput at large retail or

wholesale outlets makes this a concern as these types of outlets are projected to account for an increasing market share in the next few years.

Key Health Findings

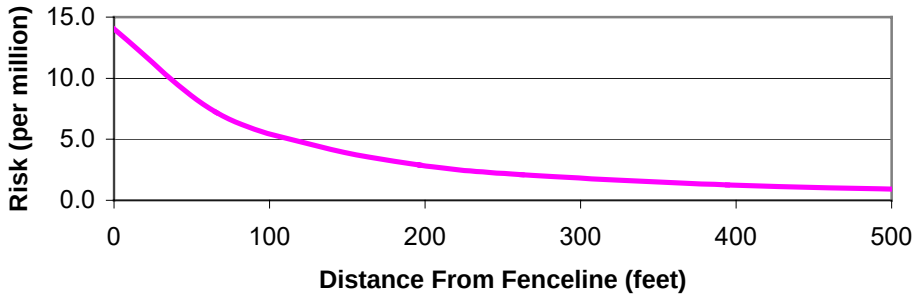
Benzene is a human carcinogen identified by ARB as a toxic air contaminant. Benzene also can cause non-cancer health effects above a certain level of exposure. Brief inhalation exposure to high concentrations can cause central nervous system depression. Acute effects include central nervous system symptoms of nausea, tremors, drowsiness, dizziness, headache, intoxication, and unconsciousness. It is unlikely that the public would be exposed to levels of benzene from gasoline dispensing facilities high enough to cause these non-cancer health effects.

Distance Related Findings

A well-maintained vapor recovery system can decrease emissions of benzene by more than 90% compared with an uncontrolled facility. Almost all facilities have emission control systems. Air quality modeling of the health risks from gasoline dispensing facilities indicate that the impact from the facilities decreases rapidly as the distance from the facility increases.

Statistics reported in the ARB's staff reports on Enhanced Vapor Recovery released in 2000 and 2002, indicated that almost 96 percent of the gasoline dispensing facilities had a throughput less than 2.4 million gallons per year. The remaining four percent, or approximately 450 facilities, had throughputs exceeding 2.4 million gallons per year. For these stations, the average gasoline throughput was 3.6 million gallons per year.

Figure 1-6
Gasoline Dispensing Facility Health Risk
for 3,600,000 gal/yr throughput



As shown in Figure 1-6, the risk levels for a gasoline dispensing facility with a throughput of 3.6 million gallons per year is about 10 in one million at a distance of 50 feet from the fenceline. However, as the throughput increases, the potential risk increases.

As mentioned above, air pollution levels in the immediate vicinity of large gasoline dispensing facilities may be higher than the surrounding area (although tailpipe emissions from motor vehicles dominates the health impacts). Very large gasoline dispensing facilities located at large wholesale and discount centers may dispense nine million gallons of gasoline per year or more. At nine million gallons, the potential risk could be around 25 in one million at 50 feet, dropping to about five in one million at 300 feet. Some facilities have throughputs as high as 19 million gallons.

Recommendation

- Avoid siting new sensitive land uses within 300 feet of a large gasoline dispensing facility (defined as a facility with a throughput of 3.6 million gallons per year or greater). A 50 foot separation is recommended for typical gas dispensing facilities.

References

- *Gasoline Service Station Industry-wide Risk Assessment Guidelines.* California Air Pollution Control Officers Association (December 1997 and revised November 1, 2001)
- *Staff Report on Enhanced Vapor Recovery.* ARB (February 4, 2000)
- *The California Almanac of Emissions and Air Quality.* ARB (2004)
- *Staff Report on Enhanced Vapor Recovery Technology Review.* ARB (October 2002)

Other Facility Types that Emit Air Pollutants of Concern

In addition to source specific recommendations, Table 1-3 includes a list of other industrial sources that could pose a significant health risk to nearby sensitive individuals depending on a number of factors. These factors include the amount of pollutant emitted and its toxicity, the distance to nearby individuals, and the type of emission controls in place. Since these types of facilities are subject to air permits from local air districts, facility specific information should be obtained where there are questions about siting a sensitive land use close to an industrial facility.

Potential Sources of Odor and Dust Complaints

Odors and dust from commercial activities are the most common sources of air pollution complaints and concerns from the public. Land use planning and permitting processes should consider the potential impacts of odor and dust on surrounding land uses, and provide for adequate separation between odor and dust sources. As with other types of air pollution, a number of factors need to be considered when determining an adequate distance or mitigation to avoid odor or

Table 1-3 – Examples of Other Facility Types That Emit[1] Air Pollutants of Concern

Categories	Facility Type	Air Pollutants of Concern
Commercial		
	Autobody Shops	Metals, Solvents
	Furniture Repair	Solvents[2], Methylene Chloride
	Film Processing Services	Solvents, Perchloroethylene
	Distribution Centers	Diesel Particulate Matter
	Printing Shops	Solvents
	Diesel Engines	Diesel Particulate Matter
Industrial		
	Construction	Particulate Matter, Asbestos
	Manufacturers	Solvents, Metals
	Metal Platers, Welders, Metal Spray (flame spray) Operations	Hexavalent Chromium, Nickel, Metals
	Chemical Producers	Solvents, Metals
	Furniture Manufacturers	Solvents
	Shipbuilding and Repair	Hexavalent chromium and other metals, Solvents
	Rock Quarries and Cement Manufacturers	Particulate Matter, Asbestos
	Hazardous Waste Incinerators	Dioxin, Solvents, Metals
	Power Plants	Benzene, Formaldehyde, Particulate Matter
	Research and Development Facilities	Solvents, Metals, etc.
Public		
	Landfills	Benzene, Vinyl Chloride, Diesel Particulate Matter
	Waste Water Treatment Plants	Hydrogen Sulfide
	Medical Waste Incinerators	Dioxin, Benzene, PAH, PCBs, 1,3-Butadiene
	Recycling, Garbage Transfer Stations	Diesel Particulate Matter
	Municipal Incinerators	Dioxin, Benzene, PAH, PCBs, 1,3-Butadiene
Transportation		
	Truck Stops	Diesel Particulate Matter
Agricultural Operations		
	Farming Operations	Diesel Particulate Matter, VOCs, NOx, PM10, CO, SOx, Pesticides
	Livestock and Dairy Operations	Ammonia, VOCs, PM10

[1]Not all facilities will emit pollutants of concern due to process changes or chemical substitution. Consult the local air district regarding specific facilities.
[2]Some solvents may emit toxic air pollutants, but not all solvents are toxic air contaminants.

dust complaints in a specific situation. Local air districts should be consulted for advice when these siting situations arise.

Table 1-4 lists some of the most common sources of odor complaints received by local air districts. Complaints about odors are the responsibility of local air districts and are covered under state law. The types of facilities that can cause odor complaints are varied and can range from small commercial facilities to large industrial facilities, and may include waste disposal and recycling operations. Odors can cause health symptoms such as nausea and headache. Facilities with odors may also be sources of toxic air pollutants (See Table 1-3). Some common sources of odors emitted by facilities are sulfur compounds, organic solvents, and the decomposition/digestion of biological materials. Because of the subjective nature of an individual's sensitivity to a particular type of odor, there is no specific rule for assigning appropriate separations from odor sources. Under the right meteorological conditions, some odors may still be offensive several miles from the source.

Table 1-4
Sources of Odor Complaints

- Sewage Treatment Plants
- Landfills
- Recycling Facilities
- Waste Transfer Stations
- Petroleum Refineries
- Biomass Operations
- Autobody Shops
- Coating Operations
- Fiberglass Manufacturing
- Foundries
- Rendering Plants
- Livestock Operations

Sources of dust are also common sources of air pollution-related complaints. Operations that can result in dust problems are rock crushing, gravel production, stone quarrying, and mining operations. A common source of complaints is the dust and noise associated with blasting that may be part of these operations. Besides the health impacts of dust as particulate matter, thick dust also impairs visibility, aesthetic values, and can soil homes and automobiles. Local air districts typically have rules for regulating dust sources in their jurisdictions, but dust sources can still be a concern. Therefore, separation of these facilities from residential and other new sensitive land uses should be considered.

In some areas of California, asbestos occurs naturally in stone deposits. Asbestos is a potent carcinogenic substance when inhaled. Asbestos-containing dust may be a public health concern in areas where asbestos-containing rock is mined, crushed, processed, or used. Situations where asbestos-containing gravel has been used in road paving materials are also a source of asbestos exposure to the general public. Planners are advised to consult with local air pollution agencies in areas where asbestos-containing gravel or stone products are produced or used.

2. Handbook Development

ARB and local air districts share responsibility for improving statewide air quality. As a result of California's air pollution control programs, air quality has improved and health risk has been reduced statewide. However, state and federal air quality standards are still exceeded in many areas of California and the statewide health risk posed by toxic air contaminants (air toxics) remains too high. Also, some communities experience higher pollution exposures than others - making localized impacts, as well regional or statewide impacts, an important consideration. It is for this reason that this Handbook has been produced - to promote better, more informed decision-making by local land use agencies that will improve air quality and public health in their communities.

Land use policies and practices, including planning, zoning, and siting activities, can play a critical role in air quality and public health at the local level. For instance, even with the best available control technology, some projects that are sited very close to homes, schools, and other public places can result in elevated air pollution exposures. The reverse is also true – siting a new school or home too close to an existing source of air pollution can pose a public health risk. The ARB recommendations in section 1 address this issue.

> *This Handbook is an informational document that we hope will strengthen the relationship between air quality and land use agencies. It highlights the need for land use agencies to address the potential for new projects to result in localized health risk or contribute to cumulative impacts where air pollution sources are concentrated.*

Avoiding these incompatible land uses is a key to reducing localized air pollution exposures that can result in adverse health impacts, especially to sensitive individuals.

Individual siting decisions that result in incompatible land uses are often the result of locating "sensitive" land uses next to polluting sources. These decisions can be of even greater concern when existing air pollution exposures in a community are considered. In general terms, this is often referred to as the issue of "cumulative impacts." ARB is working with local air districts to better define these situations and to make information about existing air pollution levels (e.g., from local businesses, motor vehicles, and other areawide sources) more readily available to land use agencies.

In December 2001, the ARB adopted "Policies and Actions for Environmental Justice" (Policies). These Policies were developed in coordination with a group of stakeholders, representing local government agencies, community interest

groups, environmental justice organizations, academia, and business (Environmental Justice Stakeholders Group).

The Policies included a commitment to work with land use planners, transportation agencies, and local air districts to develop ways to identify, consider, and reduce cumulative air pollution emissions, exposure, and health risks associated with land use planning and decision-making. Developed under the auspices of the ARB's Environmental Justice Stakeholders Group, this Handbook is a first step in meeting that commitment.

ARB has produced this Handbook to help achieve several objectives:

- Provide recommendations on situations to avoid when siting new residences, schools, day care centers, playgrounds, and medical-related facilities (sensitive sites or sensitive land uses);

- Identify approaches that land use agencies can use to prevent or reduce potential air pollution impacts associated with general plan policies, new land use development, siting, and permitting decisions;

- Improve and facilitate access to air quality data and evaluation tools for use in the land use decision-making process;

- Encourage stronger collaboration between land use agencies and local air districts to reduce community exposure to source-specific and cumulative air pollution impacts; and

- Emphasize community outreach approaches that promote active public involvement in the air quality/land use decision-making process.

This Handbook builds upon California's 2003 General Plan Guidelines. These Guidelines, developed by the Governor's Office of Planning and Research (OPR), explain the land use planning process and applicable legal requirements. This Handbook also builds upon a 1997 ARB report, "The Land Use-Air Quality Linkage" ("Linkage Report").[9] The Linkage Report was an outgrowth of the California Clean Air Act which, among other things, called upon local air districts to focus particular attention on reducing emissions from sources that indirectly cause air pollution by attracting vehicle trips. Such indirect sources include, but are not limited to, shopping centers, schools and universities, employment centers, warehousing, airport hubs, medical offices, and sports arenas. The Linkage Report summarizes data as of 1997 on the relationships between land use, transportation, and air quality, and highlights strategies that can help to reduce the use of single occupancy automobile use. Such strategies

[9] To access this report, please refer to ARB's website or click on: http://www.arb.ca.gov/ch/programs/link97.pdf

complement ARB regulatory programs that continue to reduce motor vehicle emissions.

In this Handbook, we identify types of air quality-related information that we recommend land use agencies consider in the land use decision-making processes such as the development of regional, general, and community plans; zoning ordinances; environmental reviews; project siting; and permit issuance. The Handbook provides recommendations on the siting of new sensitive land uses based on current analyses. It also contains information on approaches and methodologies for evaluating new projects from an air pollution perspective.

The Handbook looks at air quality issues associated with emissions from industrial, commercial, and mobile sources of air pollution. Mobile sources continue to be the largest overall contributors to the state's air pollution problems, representing the greatest air pollution health risk to most Californians. Based on current health risk information for air toxics, the most serious pollutants on a statewide basis are diesel PM, benzene, and 1,3-butadiene, all of which are primarily emitted by motor vehicles. From a state perspective, ARB continues to pursue new strategies to further reduce motor vehicle-related emissions in order to meet air quality standards and reduce air toxics risk.

While mobile sources are the largest overall contributors to the state's air pollution problems, industrial and commercial sources can also pose a health risk, particularly to people near the source. For this reason, the issue of incompatible land uses is an important focus of this document.

Handbook Audience

Even though the primary users of the Handbook will likely be agencies responsible for air quality and land use planning, we hope the ideas and technical issues presented in this Handbook will also be useful for:

- public and community organizations and community residents;
- federal, state and regional agencies that fund, review, regulate, oversee, or otherwise influence environmental policies and programs affected by land use policies; and
- private developers.

3. Key Community Focused Issues Land Use Agencies Should Consider

Two key air quality issues that land use agencies should consider in their planning, zoning, and permitting processes are:

1) **Incompatible Land Uses.** Localized air pollution impacts from incompatible land use can occur when polluting sources, such as a heavily trafficked roadway, warehousing facilities, or industrial or commercial facilities, are located near a land use where sensitive individuals are found such as a school, hospital, or homes.

2) **Cumulative Impacts.** Cumulative air pollution impacts can occur from a concentration of multiple sources that individually comply with air pollution control requirements or fall below risk thresholds, but in the aggregate may pose a public health risk to exposed individuals. These sources can be heavy or light-industrial operations, commercial facilities such as autobody shops, large gas dispensing facilities, dry cleaners, and chrome platers, and freeways or other nearby busy transportation corridors.

Incompatible Land Uses

Land use policies and practices can worsen air pollution exposure and adversely affect public health by mixing incompatible land uses. Examples include locating new sensitive land uses, such as housing or schools, next to small metal plating facilities that use a highly toxic form of chromium, or very near large industrial facilities or freeways. Based on recent monitoring and health-based studies, we now know that air quality impacts from incompatible land uses can contribute to increased risk of illness, missed work and school, a lower quality of life, and higher costs for public health and pollution control.[10]

Avoiding incompatible land uses can be a challenge in the context of mixed-use industrial and residential zoning. For a variety of reasons, government agencies and housing advocates have encouraged the proximity of affordable housing to employment centers, shopping areas, and transportation corridors, partially as a means to reduce vehicle trips and their associated emissions. Generally speaking, typical distances in mixed-use communities between businesses and industries and other land uses such as homes and schools, should be adequate to avoid health risks. However, generalizations do not always hold as we addressed in section 1 of this Handbook.

In terms of siting air pollution sources, the proposed location of a project is a major factor in determining whether it will result in localized air quality impacts. Often, the problem can be avoided by providing an adequate distance or setback

[10] For more information, the reader should refer to ARB's website on community health: http://www.arb.ca.gov/ch/ch.htm

between a source of emissions and nearby sensitive land uses. Sometimes, suggesting project design changes or mitigation measures in the project review phase can also reduce or avoid potential impacts. This underscores the importance of addressing potential incompatible land uses as early as possible in the project review process, ideally in the general plan itself.

Cumulative Air Pollution Impacts

The broad concept of cumulative air pollution impacts reflects the combination of regional air pollution levels and any localized impacts. Many factors contribute to air pollution levels experienced in any location. These include urban background air pollution, historic land use patterns, the prevalence of freeways and other transportation corridors, the concentration of industrial and commercial businesses, and local meteorology and terrain.

When considering the potential air quality impacts of polluting sources on individuals, project location and the concentration of emissions from air pollution sources need to be considered in the land use decision-making process. In section 4, the Handbook offers a series of questions that helps land use agencies determine if a project should undergo a more careful analysis. This holds true regardless of whether the project being sited is a polluting source or a sensitive land use project.

Large industrial areas are not the only land uses that may result in public health concerns in mixed-use communities. Cumulative air pollution impacts can also occur if land uses do not adequately provide setbacks or otherwise protect sensitive individuals from potential air pollution impacts associated with nearby light industrial sources. This can occur with activities such as truck idling and traffic congestion, or from indirect sources such as warehousing facilities that are located in a community or neighborhood.

In October 2004, Cal/EPA published its Environmental Justice Action Plan. In February 2005, the Cal/EPA Interagency Working Group approved a working definition of "cumulative impacts" for purposes of initially guiding the pilot projects that are being conducted pursuant to that plan. Cal/EPA is now in the process of developing a Cumulative Impacts Assessment Guidance document. Cal/EPA will revisit the working definition of "cumulative impacts" as the Agency develops that guidance. The following is the working definition:

> *"Cumulative impacts means exposures, public health or environmental effects from the combined emissions and discharges, in a geographic area, including environmental pollution from all sources, whether single or multi-media, routinely, accidentally, or otherwise released. Impacts will take into account sensitive populations and socio-economic factors, where applicable, and to the extent data are available."*

4. Mechanisms for Integrating Localized Air Quality Concerns Into Land Use Processes

Land use agencies should use each of their existing planning, zoning, and permitting authorities to address the potential health risk associated with new projects. Land use-specific mechanisms can go a long way toward addressing both localized and cumulative impacts from new air pollution sources that are not otherwise addressed by environmental regulations. Likewise, close collaboration and communication between land use agencies and local air districts in both the planning and project approval stages can further reduce these impacts. Local agency partnerships can also result in early identification of potential impacts from proposed activities that might otherwise escape environmental review. When this happens, pollution problems can be prevented or reduced before projects are approved, when it is less complex and expensive to mitigate.

The land use entitlement process requires a series of planning decisions. At the highest level, the General Plan sets the policies and direction for the jurisdiction, and includes a number of mandatory elements dealing with issues such as housing, circulation, and health hazards. Zoning is the primary tool for implementing land use policies. Specific or community plans created in conjunction with a specific project also perform many of the same functions as a zoning ordinance. Zoning can be modified by means of variances and conditional use permits. The latter are frequently used to insure compatibility between otherwise conflicting land uses. Finally, new development usually requires the approval of a parcel or tract map before grading and building permits can be issued. These parcel or tract maps must be consistent with the applicable General Plan, zoning and other standards.

Land use agencies can use their planning authority to separate industrial and residential land uses, or to require mitigation where separation is not feasible. By separating incompatible land uses, land use agencies can prevent or reduce both localized and cumulative air pollution impacts without denying what might otherwise be a desirable project.[11] For instance:

- a dry cleaner could open a storefront operation in a community with actual cleaning operations performed at a remote location away from residential areas;
- gas dispensing facilities with lower fuel throughput could be sited in mixed-use areas;
- enhanced building ventilation or filtering systems in schools or senior care centers can reduce ambient air from nearby busy arterials; or
- landscaping and regular watering can be used to reduce fugitive dust at a building construction site near a school yard.

[11] It should be noted that such actions should also be considered as part of the General Plan or Plan element process.

The following general and specific land use approaches can help to reduce potential adverse air pollution impacts that projects may have on public health.

General Plans

The primary purpose of planning, and the source of government authority to engage in planning, is to protect public health, safety, and welfare. In its most basic sense, a local government General Plan expresses the community's development goals and embodies public policy relative to the distribution of future land uses, forming the basis for most land use decisions. Therefore, the most effective mechanism for dealing with the central land use concept of compatibility and its relationship to cumulative air pollution impacts is the General Plan. Well before projects are proposed within a jurisdiction, the General Plan sets the stage for where projects can be sited, and their compatibility with comprehensive community goals, objectives, and policies.

In 2003, OPR revised its General Plan Guidelines, highlighting the importance of incorporating sustainable development and environmental justice policies in the planning process. The OPR General Plan Guidelines provides an effective and long-term approach to reduce cumulative air pollution impacts at the earliest planning stages. In light of these important additions to the Guidelines, land use agencies should consider updating their General Plans or Plan elements to address these revisions.

The General Plan and related Plan elements can be used to avoid incompatible land uses by incorporating air quality considerations into these documents. For instance, a General Plan safety element with an air quality component could be used to incorporate policies or objectives that are intended to protect the public from the potential for facility breakdowns that may result in a dangerous release of air toxics. Likewise, an air quality component to the transportation circulation element of the General Plan could include policies or standards to prevent or reduce local exposure to diesel exhaust from trucks and other vehicles. For instance, the transportation circulation element could encourage the construction of alternative routes away from residential areas for heavy-duty diesel trucks. By considering the relationship between air quality and transportation, the circulation element could also include air quality policies to prevent or reduce trips and travel, and thus vehicle emissions. Policies in the land use element of the General Plan could identify areas appropriate for future industrial, commercial, and residential uses. Such policies could also introduce design and distance parameters that reduce emissions, exposure, and risk from industrial and some commercial land uses (e.g., dry cleaners) that are in close proximity to residential areas or schools.

Land use agencies should also consider updating or creating an air quality element in the jurisdiction's General Plan. In the air quality element, local decision-makers could develop long-term, effective plans and policies to address

air quality issues, including cumulative impacts. The air quality element can also provide a general reference guide that informs local land use planners about regional and community level air quality, regulatory air pollution control requirements and guidelines, and references emissions and pollution source data bases and assessment and modeling tools. As is further described in Appendix C of the Handbook, new assessment tools that ARB is developing can be included into the air quality element by reference. For instance, ARB's statewide risk maps could be referenced in the air quality element as a resource that could be consulted by developers or land use agencies

Zoning

The purpose of "zoning" is to separate different land uses. Zoning ordinances establish development controls to ensure that private development takes place within a given area in a manner in which:

- All uses are compatible (e.g., an industrial plant is not permitted in a residential area);
- Common development standards are used (e.g., all homes in a given area are set back the same minimum distance from the street); and,
- Each development does not unreasonably impose a burden upon its neighbors (e.g., parking is required on site so as not to create neighborhood parking problems).

To do this, use districts called "zones" are established and standards are developed for these zones. The four basic zones are residential, commercial, industrial and institutional.

Land use agencies may wish to consider how zoning ordinances, particularly those for mixed-use areas, can be used to avoid exacerbating poor land use practices of the past or contributing to localized and cumulative air pollution impacts in the community.

Sometimes, especially in mixed-use zones, there is a potential for certain categories of existing businesses or industrial operations to result in cumulative air pollution impacts to new development projects. For example:

- An assisted living project is proposed for a mixed-use zone adjacent to an existing chrome plating facility, or several dry cleaners;
- Multiple industrial sources regulated by a local air district are located directly upwind of a new apartment complex;
- A new housing development is sited in a mixed-use zone that is downwind or adjacent to a distribution center that attracts diesel-fueled delivery trucks and TRUs; or
- A new housing development or sensitive land use is sited without adequate setbacks from an existing major transportation corridor or rail yard.

As part of the public process for making zoning changes, local land use agencies could work with community planning groups, local businesses, and community residents to determine how best to address existing incompatible land uses.

Land Use Permitting Processes

■ Questions to Consider When Reviewing New Projects

Very often, just knowing what questions to ask can yield critical information about the potential air pollution impacts of proposed projects – both from the perspective of a specific project as well as in the nature of existing air pollution sources in the same impact area. Available land use information can reveal the proximity of air pollution sources to sensitive individuals, the potential for incompatible land uses, and the location and nature of nearby air pollution sources. Air quality data, available from the ARB and local air districts, can provide information about the types and amounts of air pollution emitted in an area, regional air quality concentrations, and health risk estimates for specific sources.

General Plans and zoning maps are an excellent starting point in reviewing project proposals for their potential air pollution impacts. These documents contain information about existing or proposed land uses for a specific location as well as the surrounding area. Often, just looking at a map of the proposed location for a facility and its surrounding area will help to identify a potential adjacent incompatible land use.

The following pages are a “pull-out” list of questions to consider along with cross-references to pertinent information in the Handbook. These questions are intended to assist land use agencies in evaluating potential air quality-related concerns associated with new project proposals.

The first group of questions contains project-related queries designed to help identify the potential for localized project impacts, particularly associated with incompatible land uses. The second group of questions focuses on the issue of potential cumulative impacts by including questions about existing emissions and air quality in the community, and community feedback. Depending on the answers to these questions, a land use agency may decide a more detailed review of the proposal is warranted.

The California Department of Education has already developed a detailed process for school siting which is outlined in Appendix E. However, school districts may also find this section helpful when evaluating the most appropriate site for new schools in their area. At a minimum, using these questions may encourage school districts to engage throughout their siting process with land use agencies and local air districts. The combined expertise of these entities can be useful in devising relevant design standards and mitigation measures that can

reduce exposure to cumulative emissions, exposure, and health risk to students and school workers.

As indicated throughout the Handbook, we strongly encourage land use agencies to consult early and often with local air districts. Local air districts have the expertise, many of the analytical tools, and a working knowledge of the sources they regulate. It is also critical to fully involve the public and businesses that could be affected by the siting decision. The questions provided in the chart below do not imply any particular action should be taken by land use agencies. Rather the questions are intended to improve the assessment process and facilitate informed decision-making.

- **Project-Related Questions**

This section includes project-related questions that, in conjunction with the questions in the next section, can be used to tailor the project evaluation. These questions are designed to help identify the potential for incompatible land uses from localized project impacts.

Questions to Consider When Reviewing New Projects

Project-Related Questions	Cross-Reference to Relevant Handbook Sections
1. Is the proposed project: ▲ A business or commercial license renewal ▲ A new or modified commercial project ▲ A new or modified industrial project ▲ A new or modified public facility project ▲ A new or modified transportation project ▲ A housing or other development in which sensitive individuals may live or play	See Appendix A for typical land use classifications and associated project categories that could emit air pollutants.
2. Does the proposed project: ▲ Conform to the zoning designation? ▲ Require a variance to the zoning designation? ▲ Include plans to expand operations over the life of the business such that additional emissions may increase the pollution burden in the community (e.g., from additional truck operations, new industrial operations or process lines, increased hours of operation, build-out to the property line, etc.)?	See Appendix F for a general explanation of land use processes. In addition, Section 3 contains a discussion of how land use planning, zoning, and permitting practices can result in incompatible land uses or cumulative air pollution impacts.
3. Has the local air district provided comments or information to assist in the analysis?	See Section 5 and Appendix C for a description of air quality-related tools that the ARB and local air districts use to provide information on potential air pollution impacts.
4. Have public meetings been scheduled with the affected community to solicit their involvement in the decision-making process for the proposed project?	See Section 7 for a discussion of public participation, information and outreach tools.
5. If the proposed project will be subject to local air district regulations: ▲ Has the project received a permit from the local air district? ▲ Would it comply with applicable local air district requirements? ▲ Is the local air district contemplating new regulations that would reduce emissions from the source over time? ▲ Will potential emissions from the project	See Appendix C for a description of local air district programs.

Project-Related Questions	Cross-Reference to Relevant Handbook Sections
trigger the local air district's new source review for criteria pollutants or air toxics emissions? ▲ Is the local air district expected to ask the proposed project to perform a risk assessment? ▲ Is there sufficient new information or public concern to call for a more thorough environmental analysis of the proposed project? ▲ Are there plans to expand operations over time? ▲ Are there land-use based air quality significance thresholds or design standards that could be applied to this project in addition to applicable air district requirements?	
6. If the proposed project will release air pollution emissions, either directly or indirectly, but is not regulated by the local air district: ▲ Is the local air district informed of the project? ▲ Does the local air district believe that there could be potential air pollution impacts associated with this project category because of the proximity of the project to sensitive individuals? ▲ If the project is one in which individuals live or play (e.g., a home, playground, convalescent home, etc.), does the local air district believe that the project's proximity to nearby sources could pose potential air pollution impacts? ▲ Are there indirect emissions that could be associated with the project (e.g., truck traffic or idling, transport refrigeration unit operations, stationary diesel engine operations, etc.) that will be in close proximity to sensitive individuals? ▲ Will the proposed project increase or serve as a magnet for diesel traffic? ▲ Are there land-use based air quality significance thresholds or design standards that could be applied to this project in addition to applicable air district requirements? ▲ Is there sufficient new information or public concern to call for a more thorough environmental analysis of the proposed project? ▲ Should the site approval process include identification and mitigation of potential	See Section 1 for recommendations on situations to avoid when siting projects where sensitive individuals would be located (sensitive sites).

Project-Related Questions	Cross-Reference to Relevant Handbook Sections
direct or indirect emissions associated with the potential project?	
7. Does the local air district or land use agency have pertinent information on the source, such as: ▲ Available permit and enforcement data, including for the owner or operator of the proposed source that may have other sources in the State. ▲ Proximity of the proposed project to sensitive individuals. ▲ Number of potentially exposed individuals from the proposed project. ▲ Potential for the proposed project to expose sensitive individuals to odor or other air pollution nuisances. ▲ Meteorology or the prevailing wind patterns between the proposed project and the nearest receptor, or between the proposed sensitive receptor project and sources that could pose a localized or cumulative air pollution impact.	See Appendix C for a description of local air district programs. See Appendix B for a listing of useful information that land use agencies should have on hand or have accessible when reviewing proposed projects for potential air pollution impacts. Also, do not hesitate to contact your local air district regarding answers to any of these questions that might not be available at the land use agency. See Section 1 for recommendations on situations to avoid when siting projects where sensitive individuals would be located (sensitive sites).
8. Based upon the project application, its location, and the nature of the source, could the proposed project: ▲ Be a polluting source that is located in proximity to, or otherwise upwind, of a location where sensitive individuals live or play? ▲ Attract sensitive individuals and be located in proximity to or otherwise downwind, of a source or multiple sources of pollution, including polluting facilities or transportation-related sources that contribute emissions either directly or indirectly? ▲ Result in health risk to the surrounding community?	See Section 3 for a discussion of what is an incompatible land use and the potential cumulative air pollution impacts. See Section 1 for recommendations on situations to avoid when siting projects where sensitive individuals would be located (sensitive sites).
9. If a CEQA categorical exemption is proposed, were the following questions considered: ▲ Is the project site environmentally sensitive as defined by the project's location? (A project that is ordinarily insignificant in its impact on the environment may in a particularly sensitive environment be significant.) ▲ Would the project and successive future projects of the same type in the approximate location potentially result in cumulative impacts? ▲ Are there "unusual circumstances" creating the possibility of significant effects?	See CEQA Guidelines section 15300, and Public Resources Code, section 21084. See Section 1 for recommendations on situations to avoid when siting projects where sensitive individuals would be located (sensitive sites). See also Section 5 and Appendix C for a description of air quality-related tools that the ARB and local air districts use to provide information on potential air pollution impacts.

- **Questions Related to Cumulative Impact Assessment**

The following questions can be used to provide the decision-maker with a better understanding of the potential for cumulative air pollution impacts to an affected community. Answers to these questions will help to determine if new projects or activities warrant a more detailed review. It may also help to see potential environmental concerns from the perspective of the affected community. Additionally, responses can provide local decision-makers with information with which to assess the best policy options for addressing neighborhood-scale air pollution concerns.

The questions below can be used to identify whether existing tools and procedures are adequate to address land use-related air pollution issues. This process can also be used to pinpoint project characteristics that may have the greatest impact on community-level emissions, exposure, and risk. Such elements can include: the compliance record of existing sources including those owned or operated by the project proponent; the concentration of emissions from polluting sources within the approximate area of sensitive sites; transportation circulation in proximity to the proposed project; compatibility with the General Plan and General Plan elements; etc.

The local air district can provide useful assistance in the collection and evaluation of air quality-related information for some of the questions and should be consulted early in the process.

Questions Related to Cumulative Impact Assessment

Technical Questions	Cross-Reference to Relevant Handbook Sections
1. Is the community home to industrial facilities?	See Appendix A for typical land use classifications and associated project categories that could emit air pollutants.
2. Do one or more major freeways or high-traffic volume surface streets cut through the community?	See transportation circulation element of your general plan. See also Appendix B for useful information that land use agencies should have on hand or have accessible when reviewing proposed projects for potential air pollution impacts. See Section 1 for recommendations on situations to avoid when siting projects where sensitive individuals would be located (sensitive sites).
3. Is the area classified for mixed-use zoning?	See your general plan and zoning ordinances.
4. Is there an available list of air pollution sources in the community?	Contact your local air district.
5. Has a walk-through of the community been conducted to gather the following information:	See Appendix B for a listing of useful information that land use agencies

Technical Questions	Cross-Reference to Relevant Handbook Sections
▲ Corroborate available information on land use activities in the area (e.g., businesses, housing developments, sensitive individuals, etc.)? ▲ Determine the proximity of existing and anticipated future projects to residential areas or sensitive individuals? ▲ Determine the concentration of emission sources (including anticipated future projects) to residential areas or sensitive individuals?	should have on hand or have accessible when reviewing proposed projects for potential air pollution impacts. Also contact your local air district.
6. Has the local air district been contacted to obtain information on sources in the community?	See Section 7 for a discussion of public participation, information and outreach tools.
7. What categories of commercial establishments are currently located in the area and does the local air district have these sources on file as being regulated or permitted?	See Appendix A for typical land use classifications and associated project categories that could emit air pollutants. Also contact your local air district.
8. What categories of indirect sources such as distribution centers or warehouses are currently located in the area?	See Appendix A for typical land use classifications and associated project categories that emit air pollutants.
9. What air quality monitoring data are available?	Contact your local air district.
10. Have any risk assessments been performed on emission sources in the area?	Contact your local air district.
11. Does the land use agency have the capability of applying a GIS spatial mapping tool that can overlay zoning, sub-development information, and other neighborhood characteristics, with air pollution and transportation data?	See Appendix B for a listing of useful information that land use agencies should have on hand or have accessible when reviewing proposed projects for potential air pollution impacts. Also contact your local air district for tools that can be used to supplement available land use agency tools.
12. Based on available information, is it possible to determine if the affected community or neighborhood experiences elevated health risk due to a concentration of air pollution sources in close proximity, and if not, can the necessary information be obtained?	Contact your local air district. Also see Section 1 for recommendations on situations to avoid when siting projects where sensitive individuals would be located (sensitive sites).
13. Does the community have a history of chronic complaints about air quality?	See Section 7 for a discussion of public participation, information and outreach tools. Also contact your local air district.
14. Is the affected community included in the public participation process for the agency's decision?	See Section 7 for a discussion of public participation, information and outreach tools.
15. Have community leaders or groups been contacted about any pre-existing or chronic community air quality concerns?	See Section 7 for a discussion of public participation, information and outreach tools. Also contact your local air district.

- **Mitigation Approaches**

In addition to considering the suitability of the project location, opportunities for mitigation of air pollution impacts should be considered. Sometimes, a land use agency may find that selection of a different project location to avoid a health risk is not feasible. When that happens, land use agencies should consider design improvements or other strategies that would reduce the risk. Such strategies could include performance or design standards, consultation with local air districts and other agencies on appropriate actions that these agencies should, or plan to, undertake, and consultation and outreach in the affected community. Potential mitigation measures should be feasible, cost-effective solutions within the available resources and authority of implementing agencies to enforce.[12]

- **Conditional Use Permits and Performance Standards**

Some types of land uses are only allowed upon approval of a conditional use permit (also called a CUP or special use permit). A conditional use permit does not re-zone the land but specifies conditions under which a particular land use will be permitted. Such land uses could be those with potentially significant environmental impacts. Local zoning ordinances specify the uses for which a conditional use permit is required, the zones they may be allowed in, and public hearing procedures. The conditional use permit imposes special requirements to ensure that the use will not be detrimental to its surroundings.

In the context of land use planning, performance standards are requirements imposed on projects or project categories through conditional use permits to ensure compliance with general plan policies and local ordinances. These standards could apply to such project categories as distribution centers, very large gas dispensing facilities, autobody shops, dry cleaners, and metal platers. Land use agencies may wish to consider adding land use-based performance standards to zoning ordinances in existing mixed-use communities for certain air pollution project categories. Such standards would provide certainty and equitable treatment to all projects of a similar nature, and reserve the more resource intensive conditional or special use permits to projects that require a more detailed analysis. In developing project design or performance standards, land use agencies should consult with the local air district. Early and regular consultation can avoid duplication or inconsistency with local air district control requirements when considering the site-specific design and operation of a project.

[12] A land use agency has the authority to condition or deny a project based upon information collected and evaluated through the land use decision-making process. However, any denial would need to be based upon identifiable, generally applicable, articulated standards set forth in the local government's General Plan and zoning codes. One way of averting this is to conduct early and regular outreach to the community and the local air district so that community and environmental concerns can be addressed and accommodated into the project proposal.

Examples of land use-based air quality-specific performance standards include the following:

- Placing a process vent away from the direction of the local playground that is nearby or increasing the stack height so that emissions are dispersed to reduce the emissions impact on surrounding homes or schools.
- Setbacks between the project fence line and the population center.
- Limiting the hours of operation of a facility to avoid excess emissions exposure or foul odors to nearby individuals.
- An ordinance that requires fleet operators to use cleaner vehicles before project approval (if a new business), or when expanding the fleet (if an existing business); and
- Providing alternate routes for truck operations that discourage detours into residential neighborhoods.

Outreach to Other Agencies

When questions arise regarding the air quality impacts of projects, including potential cumulative impacts, land use agencies should consult the local air district. Land use agencies should also consider the following suggestions to avoid creating new incompatible land uses:

- Consult with the local air district to help determine if emissions from a particular project will adversely impact sensitive individuals in the area, if existing or future effective regulations or permit requirements will affect the proposed project or other sources in the vicinity of the proposed project, or if additional inspections should be required.
- Check with ARB for new information and modeling tools that can help evaluate projects seeking to site within your jurisdiction.
- Become familiar with ARB's Land Use-Air Quality Linkage Report to determine whether approaches and evaluation tools contained in the Report can be used to reduce transportation-related impacts on communities.
- Contact and collaborate with other state agencies that play a role in the land use decision-making process, e.g., the State Department of Education, the California Energy Commission, and Caltrans. These agencies have information on mitigation measures and mapping tools that could be useful in addressing local problems.

- **Information Clearinghouse**

  - Land use agencies can refer to the ARB statewide electronic information clearinghouse for information on what measures other jurisdictions are using to address comparable issues or sources.[13]

[13] This information can be accessed from ARB's website by going to: http://www.arb.ca.gov/ch/clearinghouse.htm

The next section addresses available air quality assessment tools that land use agencies can use to evaluate the potential for localized or cumulative impacts in their communities.

5. Available Tools to Evaluate Cumulative Air Pollution Emissions and Risk

Until recently, California has traditionally approached air pollution control from the perspective of assessing whether the pollution was regional, category-specific, or from new or existing sources. This methodology has been generally effective in reducing statewide and regional air pollution impacts and risk levels. However, such an incremental, category-by-category, source-by-source approach may not always address community health impacts from multiple sources - including mobile, industrial, and commercial facilities.

As a result of air toxics and children's health concerns over the past several years, ARB and local air districts have begun to develop new tools to evaluate and inform the public about cumulative air pollution impacts at the community level. One aspect of ARB's programs now underway is to consolidate and make accessible air toxics emissions and monitoring data by region, using modeling tools and other analytical techniques to take a preliminary look at emissions, exposure, and health risk in communities.

ARB has developed multiple tools to assist local air districts perform assessments of cumulative emissions, exposure, and risk on a neighborhood scale. These tools include:

- Regional risk maps that show trends in potential cancer risk from toxic air pollutants in southern and central California between 1990 and 2010. These maps are based on the U.S. EPA's ASPEN model. These maps provide an estimate of background levels of toxic air pollutant risk but are not detailed enough to assess individual neighborhoods or facilities.[14]

- The Community Health Air Pollution Information System (CHAPIS) is a user-friendly, Internet-based system for displaying information on emissions from sources of air pollution in an easy to use mapping format. CHAPIS contains information on air pollution emissions from selected large facilities and small businesses that emit criteria and toxic air pollutants. It also contains information on air pollution emissions from motor vehicles. When released in 2004, CHAPIS did not contain information on every source of air pollution or every air pollutant. However, ARB continues to work with local air districts to include all of the largest air pollution sources and those with the highest documented air pollution risk. Additional facilities will be added to CHAPIS as more data become available.[15]

[14] For further information on these maps, please visit ARB's website at: http://www.arb.ca.gov/toxics/cti/hlthrisk/hlthrisk.htm

[15] For further information on CHAPIS, please click on: http://www.arb.ca.gov/ch/chapis1/chapis1.htm

- The Hot Spots Analysis and Reporting Program (HARP) is a software database package that evaluates emissions from one or more facilities to determine the overall health risk posed by the facility(-ies) on the surrounding community. Proper use of HARP ensures that the risk assessment meets the latest risk assessment guidelines published by the State Office of Environmental Health Hazard Assessment (OEHHA). HARP is designed with air quality professionals in mind and is available from the ARB.

- The Urban Emissions Model (URBEMIS) is a computer program that can be used to estimate emissions associated with land development projects in California such as residential neighborhoods, shopping centers, office buildings, and construction projects. URBEMIS uses emission factors available from the ARB to estimate vehicle emissions associated with new land uses.

Local air districts, and others can use these tools to assess a new project, or plan revision. For example, these tools can be used to:

- Identify if there are multiple sources of air pollution in the community;
- Identify the major sources of air pollution in the area under consideration;
- Identify the background potential cancer risk from toxic air pollution in the area under consideration;
- Estimate the risk from a new facility and how it adds to the overall risk from other nearby facilities; and
- Provide information to decision-makers and key stakeholders on whether there may be significant issues related to cumulative emissions, exposure, and health risk due to a permitting or land use decision.

If an air agency wishes to perform a cumulative air pollution impact analysis using any of these tools, it should consult with the ARB and/or the local air district to obtain information or assistance on the data inputs and procedures necessary to operate the program. In addition, land use agencies could consult with local air districts to determine the availability of land use and air pollution data for entry into an electronic Geographical Information System (GIS) format. GIS is an easier mapping tool than the more sophisticated models described in Appendix C. GIS mapping makes it possible to superimpose land use with air pollution information so that the spatial relationship between air pollution sources, sensitive receptors, and air quality can be visually represented. Appendix C provides a general description of the impact assessment process and micro-scale, or community level modeling tools that are available to evaluate potential cumulative air pollution impacts. Modeling protocols will be accessible on ARB's website as they become available. The ARB will also provide land use agencies and local air districts with statewide regional modeling results and information regarding micro-scale modeling.

6. ARB Programs to Reduce Air Pollution in Communities

ARB's regulatory programs reduce air pollutant emissions through statewide strategies that improve public health in all California communities. ARB's overall program addresses motor vehicles, consumer products, air toxics, air-quality planning, research, education, enforcement, and air monitoring. Community health and environmental justice concerns are a consideration in all these programs. ARB's programs are statewide but recognize that extra efforts may be needed in some communities due to historical mixed land-use patterns, limited participation in public processes in the past, and a greater concentration of air pollution sources in some communities.

ARB's strategies are intended to result in better air quality and reduced health risk to residents throughout California. The ARB's priority is to prevent or reduce the public's exposure to air pollution, including from toxic air contaminants that pose the greatest risk, particularly to infants and children who are more vulnerable to air pollution.

In October 2003, ARB updated its statewide control strategy to reduce emissions from source categories within its regulatory authority. A primary focus of the strategy is to achieve federal and state air quality standards for ozone and particulate matter throughout California, and to reduce health risk from diesel PM. Along with local air districts, ARB will continue to address air toxics emissions from regulated sources (see Table 6-1 for a summary of ARB activities). As indicated earlier, ARB will also provide analytical tools and information to land use agencies and local air districts to help assess and mitigate cumulative air pollution impacts.

The ARB will continue to consider the adoption of or revisions to needed air toxics control measures as part of the state's ongoing air toxics assessment program.[16]

As part of its effort to reduce particulate matter and air toxics emissions from diesel PM, the ARB has developed a Diesel Risk Reduction Program[17] that lays out several strategies in a three-pronged approach to reduce emissions and their associated risk:

- Stringent emission standards for all new diesel-fueled engines;
- Aggressive reductions from in-use engines; and
- Low sulfur fuel that will reduce PM and still provide the quality of diesel fuel needed to control diesel PM.

[16] For continuing information and updates on state measures, the reader can refer to ARB's website at http://www.arb.ca.gov/toxics/toxics.htm.
[17] For a comprehensive description of the program, please refer to ARB's website at http://www.arbB.ca.gov/diesel/dieselrrp.htm.

Table 6-1
ARB ACTIONS TO ADDRESS
CUMULATIVE AIR POLLUTION IMPACTS IN COMMUNITIES

Information Collection

- Improve emission inventories, air monitoring data, and analysis tools that can help to identify areas with high cumulative air pollution impacts
- Conduct studies in coordination with OEHHA on the potential for cancer and non-cancer health effects from air pollutants emitted by specific source categories
- Establish web-based clearinghouse for local land use strategies

Emission Reduction Approaches (2004-2006)*

- Through a public process, consider development and/or amendment of regulations and related guidance to reduce emissions, exposure, and health risk at a statewide and local level for the following sources:
  - Diesel PM sources such as stationary diesel engines, transport refrigeration units, portable diesel engines, on-road public fleets, off-road public fleets, heavy-duty diesel truck idling, harbor craft vessels, waste haulers
  - Other air toxics sources, such as formaldehyde in composite wood products, hexavalent chromium for chrome plating and chromic acid anodizing, thermal spraying, and perchloroethylene dry cleaning
- Develop technical information for the following:*
  - Distribution centers
  - Modeling tools such as HARP and CHAPIS
- Adopt rules and pollution prevention initiatives within legal authority to reduce emissions from mobile sources and fuels, and consumer products
- Develop and maintain Air Quality Handbook as a tool for use by land use agencies and local air districts to address cumulative air pollution impacts

Other Approaches

- Establish guidelines for use of statewide incentive funding for high priority mobile source emission reduction projects

*Because ARB will continue to review the need to adopt or revise statewide measures, the information contained in this chart will be updated on an ongoing basis.

A number of ARB's diesel risk reduction strategies have been adopted. These include measures to reduce emissions from refuse haulers, urban buses, transport refrigeration units, stationary and portable diesel engines, and idling trucks and school buses. These sources are all important from a community perspective.[18]

[18] The reader can refer to ARB's website for information on its mobile source-related programs at: http://www.arb.ca.gov/msprog/msprog.htm, as well as regulations adopted and under consideration as part of the Diesel Risk Reduction Program at: http://www.arb.ca.gov/diesel/dieselrrp.htm

The ARB will continue to evaluate the health effects of air pollutants while implementing programs with local air districts to reduce air pollution in all California communities.

Local air districts also have ambitious programs to reduce criteria pollutants and air toxics from regulated sources in their region. Many of these programs also benefit air quality in local communities as well as in the broader region. For more information on what is being done in your area to reduce cumulative air pollution impacts through air pollution control programs, you should contact your local air district.[19]

[19] Local air district contacts can be found on the inside cover to this Handbook.

7. Ways to Enhance Meaningful Public Participation

Community involvement is an important part of the land use process. The public is entitled to the best possible information about the air they breathe and what is being done to prevent or reduce unhealthful air pollution in their communities. In particular, information on how land use decisions can affect air pollution and public health should be made accessible to all communities, including low-income and minority communities.

Effective community participation consistently relies on a two-way flow of information – from public agencies to community members about opportunities, constraints, and impacts, and from community members back to public officials about needs, priorities, and preferences. The outreach process needed to build understanding and local neighborhood involvement requires data, methodologies, and formats tailored to the needs of the specific community. More importantly, it requires the strong collaboration of local government agencies that review and approve projects and land uses to improve the physical and environmental surroundings of the local community.

Many land use agencies, especially those in major metropolitan areas, are familiar with, and have a long-established public review process. Nevertheless, public outreach can often be improved. Active public involvement requires engaging the public in ways that do not require their previous interest in or knowledge of the land use or air pollution control requirements, and a commitment to taking action where appropriate to address the concerns that are raised.

▪ Direct Community Outreach

In conjunction with local air districts, land use agencies should consider designing an outreach program for community groups, other stakeholders, and local government agency staffs that address the problem of cumulative air pollution impacts, and the public and government role in reducing them. Such a program could consider analytical tools that assist in the preparation and presentation of information in a way that supports sensible decision-making and public involvement. Table 7-1 contains some general outreach approaches that might be considered.

Table 7-1
Public Participation Approaches

- Staff and community leadership awareness training on environmental justice programs and community-based issues
- Surveys to identify the website information needs of interested community-based organizations and other stakeholders
- Information materials on local land use and air district authorities
- Community-based councils to facilitate and invite resident participation in the planning process
- Neighborhood CEQA scoping sessions that allows for community input prior to technical analysis
- Public information materials on siting issues are under review including materials written for the affected community, and in different media that widens accessibility
- Public meetings
- Identify other opportunities to include community-based organizations in the process

To improve outreach, local land use agencies should consider the following activities:

- Hold meetings in communities affected by agency programs, policies, and projects at times and in places that encourage public participation, such as evenings and weekends at centrally located community meeting rooms, libraries, and schools.
- Assess the need for and provide translation services at public meetings.
- Hold community meetings to update residents on the results of any special air monitoring programs conducted in their neighborhood.
- Hold community meetings to discuss and evaluate the various options to address cumulative impacts in their community.
- In coordination with local air districts, make staff available to attend meetings of community organizations and neighborhood groups to listen to and, where appropriate, act upon community concerns.
- Establish a specific contact person for environmental justice issues.
- Increase student and community awareness of local government land use activities and policies through outreach opportunities.
- Make air quality and land use information available to communities in an easily understood and useful format, including fact sheets, mailings, brochures, public service announcements, and web pages, in English and other languages.
- On the local government web-site, dedicate a page or section to what the land use program is doing regarding environmental justice and cumulative environmental impacts, and, as applicable, activities conducted with local air districts such as neighborhood air monitoring studies, pollution prevention, air pollution sources in neighborhoods, and risk reduction.

- Allow, encourage, and promote community access to land use activities, including public meetings, General Plan or Community Plan updates, zoning changes, special studies, CEQA reviews, variances, etc.
- Distribute information in multiple languages, as needed, on how to contact the land use agency or local air district to obtain information and assistance regarding environmental justice programs, including how to participate in public processes.
- Create and distribute a simple, easy-to-read, and understandable public participation handbook, which may be based on the "Public Participation Guidebook" developed by ARB.

- **Other Opportunities for Meaningful Public Outreach**

  - Community-Based Planning Committees

  Neighborhood-based or community planning advisory councils could be established to invite and facilitate direct resident participation into the planning process. With the right training and technical assistance, such councils can provide valuable input and a forum for the review of proposed amendments to plans, zone changes, land use permits, and suggestions as to how best to prevent or reduce cumulative air pollution impacts in their community.

  - Regional Partnerships

  Consider creating regional coalitions of key growth-related organizations from both the private and public sectors, with corporations, communities, other jurisdictions, and government agencies. Such partnerships could facilitate agreement on common goals and win-win solutions tailored specifically for the region. With this kind of dialogue, shared vision, and collaboration, barriers can be overcome and locally acceptable sustainable solutions implemented. Over the long term, such strategies will help to bring about clean air in communities as well as regionally.

LAND USE CLASSIFICATIONS AND ASSOCIATED FACILITY CATEGORIES THAT COULD EMIT AIR POLLUTANTS

(1) Land Use Classifications – by Activity[i]	(2) Facility or Project Examples	(3) Key Pollutants[ii,iii]	(4) Air Pollution Permits[iv]
COMMERCIAL/ LIGHT INDUSTRIAL: SHOPPING, BUSINESS, AND COMMERCIAL			
▲ Primarily retail shops and stores, office, commercial activities, and light industrial or small business	Dry cleaners; drive-through restaurants; gas dispensing facilities; auto body shops; metal plating shops; photographic processing shops; textiles; apparel and furniture upholstery; leather and leather products; appliance repair shops; mechanical assembly cleaning; printing shops	VOCs, air toxics, including diesel PM, NOx, CO, SOx	Limited; Rules for applicable equipment
▲ Goods storage or handling activities, characterized by loading and unloading goods at warehouses, large storage structures, movement of goods, shipping, and trucking.	Warehousing; freight-forwarding centers; drop-off and loading areas; distribution centers	VOCs, air toxics, including diesel PM, NOx, CO, SOx	No[v]
LIGHT INDUSTRIAL: RESEARCH AND DEVELOPMENT			
▲ Medical waste at research hospitals and labs	Incineration; surgical and medical instrument manufacturers, pharmaceutical manufacturing, biotech research facilities	Air toxics, NOx, CO, SOx	Yes
▲ Electronics, electrical apparatus, components, and accessories	Computer manufacturer; integrated circuit board manufacturer; semi-conductor production	Air toxics, VOCs	Yes
▲ College or university lab or research center	Medical waste incinerators; lab chemicals handling, storage and disposal	Air toxics, NOx, CO, SOx, PM10	Yes
▲ Research and development labs	Satellite manufacturer; fiber-optics manufacturer; defense contractors; space research and technology; new vehicle and fuel testing labs	Air toxics, VOCs	Yes
▲ Commercial testing labs	Consumer products; chemical handling, storage and disposal	Air toxics, VOCs	Yes

(1) Land Use Classifications – by Activity[i]	(2) Facility or Project Examples	(3) Key Pollutants[ii,iii]	(4) Air Pollution Permits[iv]
INDUSTRIAL: NON-ENERGY-RELATED			
▲ Assembly plants, manufacturing facilities, industrial machinery	Adhesives; chemical; textiles; apparel and furniture upholstery; clay, glass, and stone products production; asphalt materials; cement manufacturers, wood products; paperboard containers and boxes; metal plating; metal and canned food product fabrication; auto manufacturing; food processing; printing and publishing; drug, vitamins, and pharmaceuticals; dyes; paints; pesticides; photographic chemicals; polish and wax; consumer products; metal and mineral smelters and foundries; fiberboard; floor tile and cover; wood and metal furniture and fixtures; leather and leather products; general industrial and metalworking machinery; musical instruments; office supplies; rubber products and plastics production; saw mills; solvent recycling; shingle and siding; surface coatings	VOCs, air toxics, including diesel PM, NOx, PM, CO, SOx	Yes
INDUSTRIAL: ENERGY AND UTILITIES			
▲ Water and sewer operations	Pumping stations; air vents; treatment	VOCs, air toxics, NOx, CO, SOx, PM10	Yes
▲ Power generation and distribution	Power plant boilers and heaters; portable diesel engines; gas turbine engines	NOx, diesel PM, NOx, CO, SOx, PM10, VOCs	Yes
▲ Refinery operations	Refinery boilers and heaters; coke cracking units; valves and flanges; flares	VOCs, air toxics, including diesel PM, NOx, CO, SOx, PM10	Yes
▲ Oil and gas extraction	Oil recovery systems; uncovered wells	NOx, diesel PM, VOCs, CO, SOx, PM10	Yes
▲ Gasoline storage, transmission, and marketing	Above and below ground storage tanks; floating roof tanks; tank farms; pipelines	VOCs, air toxics, including diesel PM, NOx, CO, SOx, PM10	Yes
▲ Solid and hazardous waste treatment, storage, and disposal activities.	Landfills; methane digester systems; process recycling facility for concrete and asphalt materials	VOCs, air toxics, NOx, CO, SOx, PM10	Yes
CONSTRUCTION (NON-TRANSPORTATION)			
	Building construction; demolition sites	PM (re-entrained road dust), asbestos, diesel PM, NOx, CO, SOx, PM10, VOCs	Limited; state and federal off-road equipment standards

(1) Land Use Classifications – by Activity[i]	(2) Facility or Project Examples	(3) Key Pollutants[ii,iii]	(4) Air Pollution Permits[iv]
DEFENSE			
	Ordnance and explosives demolition; range and testing activities; chemical production; degreasing; surface coatings; vehicle refueling; vehicle and engine operations and maintenance	VOCs, air toxics, including diesel PM, NOx, CO, SOx, PM10	Limited; prescribed burning; equipment and solvent rules
TRANSPORTATION			
▲ Vehicular movement	Residential area circulation systems; parking and idling at parking structures; drive-through establishments; car washes; special events; schools; shopping malls, etc.	VOCs, NOx, PM (re-entrained road dust) air toxics e.g., benzene, diesel PM, formaldehyde, acetaldehyde, 1,3 butadiene, CO, SOx, PM10	No
▲ Road construction and surfacing	Street paving and repair; new highway construction and expansion	VOCs, air toxics, including diesel PM, NOx, CO, SOx, PM10	No
▲ Trains	Railroads; switch yards; maintenance yards	VOCs, NOx, CO, SOx, PM10, air toxics, including diesel PM	Limited; Applicable state and federal MV standards, and possible equipment rules
▲ Marine and port activities	Recreational sailing; commercial marine operations; hotelling operations; loading and un-loading; servicing; shipping operations; port or marina expansion; truck idling		
▲ Aircraft	Takeoff, landing, and taxiing; aircraft maintenance; ground support activities		
▲ Mass transit and school buses	Bus repair and maintenance		
NATURAL RESOURCES			
▲ Farming operations	Agricultural burning; diesel operated engines and heaters; small food processors; pesticide application; agricultural off-road equipment	Diesel PM, VOCs, NOx, PM10, CO, SOx, pesticides	Limited[vi]; Agricultural burning requirements, applicable state and federal mobile source standards; pesticide rules
▲ Livestock and dairy operations	Dairies and feed lots	Ammonia, VOCs, PM10	Yes[vii]
▲ Logging	Off-road equipment e.g., diesel fueled chippers, brush hackers, etc.	Diesel PM, NOx, CO, SOx, PM10, VOCs	Limited; Applicable state/federal mobile source standards
▲ Mining operations	Quarrying or stone cutting; mining; drilling or dredging	PM10, CO, SOx, VOCs, NOx, and asbestos in some geographical areas	Applicable equipment rules and dust controls

(1) Land Use Classifications – by Activity[i]	(2) Facility or Project Examples	(3) Key Pollutants[ii,iii]	(4) Air Pollution Permits[iv]
RESIDENTIAL			
Housing	Housing developments; retirement developments; affordable housing	Fireplace emissions (PM10, NOx, VOCs, CO, air toxics); Water heater combustion (NOx, VOCs, CO)	No[vii]
ACADEMIC AND INSTITUTIONAL			
▲ Schools, including school-related recreational activities	Schools; school yards; vocational training labs/classrooms such as auto repair/painting and aviation mechanics	Air toxics	Yes/No[viii]
▲ Medical waste	Incineration	Air toxics, NOx, CO, PM10	Yes
▲ Clinics, hospitals, convalescent homes		Air toxics	Yes

[i] These classifications were adapted from the American Planning Association's "Land Based Classification Standards." The Standards provide a consistent model for classifying land uses based on their characteristics. The model classifies land uses by refining traditional categories into multiple dimensions, such as activities, functions, building types, site development character, and ownership constraints. Each dimension has its own set of categories and subcategories. These multiple dimensions allow users to have precise control over land-use classifications. For more information, the reader should refer to the Association's website at http://www.planning.org/LBCS/GeneralInfo/.

[ii] This column includes key criteria pollutants and air toxic contaminants that are most typically associated with the identified source categories.

Additional information on specific air toxics that are attributed to facility categories can be found in ARB's Emission Inventory Criteria and Guidelines Report for the Air Toxics Hot Spots Program (May 15, 1997). This information can be viewed at ARB's web site at http://www.arb.ca.gov/ab2588/final96/guide96.pdf.

Criteria air pollutants are those air pollutants for which acceptable levels of exposure can be determined and for which an ambient air quality standard has been set. Criteria pollutants include ozone (formed by the reaction of volatile organic compounds and nitrogen oxides in the presence of sunlight), particulate matter, nitrogen dioxide, sulfur dioxide, carbon monoxide, and lead.

Volatile organic compounds (VOCs) combine with nitrogen oxides to form ozone, as well as particulate matter. VOC emissions result primarily from incomplete fuel combustion and the evaporation of chemical solvents and fuels. On-road mobile sources are the largest contributors to statewide VOC emissions. Stationary sources of VOC emissions include processes that use solvents (such as dry-cleaning, degreasing, and coating operations) and petroleum-related processes (such as petroleum refining, gasoline marketing and dispensing, and oil and gas extraction). Areawide VOC sources include consumer products, pesticides, aerosols and paints, asphalt paving and roofing, and other evaporative emissions.

Nitrogen oxides (NOx) are a group of gaseous compounds of nitrogen and oxygen, many of which contribute to the formation of ozone and particulate matter. Most NOx emissions are produced by the combustion of fuels. Mobile sources make up about 80 percent of the total statewide NOx emissions. Mobile sources include on-road vehicles and trucks, aircraft, trains, ships, recreational boats, industrial and construction equipment, farm

equipment, off-road recreational vehicles, and other equipment. Stationary sources of NOx include both internal and external combustion processes in industries such as manufacturing, food processing, electric utilities, and petroleum refining. Areawide source, which include residential fuel combustion, waste burning, and fires, contribute only a small portion of the total statewide NOx emissions, but depending on the community, may contribute to a cumulative air pollution impact.

Particulate matter (PM) refers to particles small enough to be breathed into the lungs (under 10 microns in size). It is not a single substance, but a mixture of a number of highly diverse types of particles and liquid droplets. It can be formed directly, primarily as dust from vehicle travel on paved and unpaved roads, agricultural operations, construction and demolition.

Carbon monoxide (CO) is a colorless and odorless gas that is directly emitted as a by-product of combustion. The highest concentrations are generally associated with cold stagnant weather conditions that occur during winter. CO problems tend to be localized.

An Air Toxic Contaminant (air toxic) is defined as an air pollutant that may cause or contribute to an increase in mortality or in serous illness, or which may pose a present or potential hazard to human health. Similar to criteria pollutants, air toxics are emitted from stationary, areawide, and mobile sources. They contribute to elevated regional and localized risks near industrial and commercial facilities and busy roadways. The ten compounds that pose the greatest statewide risk are: acetaldehyde; benzene; 1,3-butadiene; carbon tetrachloride; diesel particulate matter (diesel PM); formaldehyde; hexavalent chromium; methylene chloride; para-dichlorobenzene; and perchloroethylene. The risk from diesel PM is by far the largest, representing about 70 percent of the known statewide cancer risk from outdoor air toxics. The exhaust from diesel-fueled engines is a complex mixture of gases, vapors, and particles, many of which are known human carcinogens. Diesel PM is emitted from both mobile and stationary sources. In California, on-road diesel-fueled vehicles contribute about 26 percent of statewide diesel PM emissions, with an additional 72 percent attributed to other mobile sources such as construction and mining equipment, agricultural equipment, and other equipment. Stationary engines in shipyards, warehouses, heavy equipment repair yards, and oil and gas production operations contribute about two percent of statewide emissions. However, when this number is disaggregated to a sub-regional scale such as neighborhoods, the risk factor can be far greater.

[iii] The level of pollution emitted is a major determinant of the significance of the impact.

[iv] Indicates whether facility activities listed in column 4 are generally subject to local air district permits to operate. This does not include regulated products such as solvents and degreasers that may be used by sources that may not require an operating permit per se, e.g., a gas station or dry cleaner.

[v] Generally speaking, warehousing or distribution centers are not subject to local air district permits. However, depending on the district, motor vehicle fleet rules may apply to trucks or off-road vehicles operated and maintained by the facility operator. Additionally, emergency generators or internal combustion engines operated on the site may require an operating permit.

[vi] Authorized by recent legislation SB700.

[vii] Local air districts do not require permits for woodburning fireplaces inside private homes. However, some local air districts and land use agencies do have rules or ordinances that require new housing developments or home re-sales to install U.S. EPA –certified stoves. Some local air districts also ban residential woodburning during weather inversions that concentrate smoke in residential areas. Likewise, home water heaters are not subject to permits; however, new heaters could be subject to emission limits that are imposed by federal or local agency regulations.

[viii] Technical training schools that conduct activities normally permitted by a local air district could be subject to an air permit.

LAND USE-BASED REFERENCE TOOLS TO EVALUATE NEW PROJECTS FOR POTENTIAL AIR POLLUTION IMPACTS

Land use agencies generally have a variety of tools and approaches at hand, or accessible from local air districts that can be useful in performing an analysis of potential air pollution impacts associated with new projects. These tools and approaches include:

- Base map of the city or county planning area and terrain elevations.
- General Plan designations of land use (existing and proposed).
- Zoning maps.
- Land use maps that identify existing land uses, including the location of facilities that are permitted or otherwise regulated by the local air district. Land use agencies should consult with their local air district for information on regulated facilities.
- Demographic data, e.g., population location and density, distribution of population by income, distribution of population by ethnicity, and distribution of population by age. The use of population data is a normal part of the planning process. However, from an air quality perspective, socioeconomic data is useful to identify potential community health and environmental justice issues.
- Emissions, monitoring, and risk-based maps created by the ARB or local air districts that show air pollution-related health risk by community across the state.
- Location of public facilities that enhance community quality of life, including parks, community centers, and open space.
- Location of industrial and commercial facilities and other land uses that use hazardous materials, or emit air pollutants. These include chemical storage facilities, hazardous waste disposal sites, dry cleaners, large gas dispensing facilities, auto body shops, and metal plating and finishing shops.
- Location of sources or facility types that result in diesel on-road and off-road emissions, e.g., stationary diesel power generators, forklifts, cranes, construction equipment, on-road vehicle idling, and operation of transportation refrigeration units. Distribution centers, marine terminals and ports, rail yards, large industrial facilities, and facilities that handle bulk goods are all examples of complex facilities where these types of emission sources are frequently concentrated.[1] Very large facilities, such as ports, marine terminals, and airports, could be analyzed regardless of proximity to a receptor if they are within the modeling area.
- Location and zoning designations for existing and proposed schools, buildings, or outdoor areas where sensitive individuals may live or play.
- Location and density of existing and proposed residential development.
- Zoning requirements, property setbacks, traffic flow requirements, and idling restrictions for trucks, trains, yard hostlers[2], construction equipment, or school buses.
- Traffic counts (including diesel truck traffic counts), within a community to validate or augment existing regional motor vehicle trip and speed data.

[1] The ARB is currently evaluating the types of facilities that may act as complex point sources and developing methods to identify them.

[2] Yard hostler means a tractor less than 300 horsepower that is used to transfer semi-truck or tractor-trailer containers in and around storage, transfer, or distribution yards or areas and is often equipped with a hydraulic lifting fifth wheel for connection to trailer containers.

ARB AND LOCAL AIR DISTRICT INFORMATION AND TOOLS CONCERNING CUMULATIVE AIR POLLUTION IMPACTS

It is the ARB's policy to support research and data collection activities toward the goal of reducing cumulative air pollution impacts. These efforts include updating and improving the air toxics emissions inventory, performing special air monitoring studies in specific communities, and conducting a more complete assessment of non-cancer health effects associated with air toxics and criteria pollutants.[1] This information is important because it helps us better understand links between air pollution and the health of sensitive individuals -- children, the elderly, and those with pre-existing serious health problems affected by air quality.

ARB is working with CAPCOA and OEHHA to improve air pollutant data and evaluation tools to determine when and where cumulative air pollution impacts may be a problem. The following provides additional information on this effort.

How are emissions assessed?

Detailed information about the sources of air pollution in an area is collected and maintained by local air districts and the ARB in what is called an emission inventory. Emission inventories contain information about the nature of the business, the location, type and amount of air pollution emitted, the air pollution-producing processes, the type of air pollution control equipment, operating hours, and seasonal variations in activity. Local districts collect emission inventory data for most stationary source categories.

Local air districts collect air pollution emission information directly from facilities and businesses that are required to obtain an air pollution operating permit. Local air districts use this information to compile an emission inventory for areas within their jurisdiction. The ARB compiles a statewide emission inventory based on the information collected by the ARB and local air districts. Local air districts provide most of the stationary source emission data, and ARB provides mobile source emissions as well as some areawide emission sources such as consumer products and paints. ARB is also developing map-based tools that will display information on air pollution sources.

Criteria pollutant data have been collected since the early 1970's, and toxic pollutant inventories began to be developed in the mid-1980's.

[1] A criteria pollutant is any air pollutant for which EPA has established a National Ambient Air Quality Standard or for which California has established a State Ambient Air Quality Standard, including: carbon monoxide, lead, nitrogen oxides, ozone, particulates and sulfur oxides. Criteria pollutants are measured in each of California's air basins to determine whether the area meets or does not meet specific federal or state air quality standards. Air toxics or air toxic contaminants are listed pollutants recognized by California or EPA as posing a potential risk to health.

How is the toxic emission inventory developed?

Emissions data for toxic air pollutants is a high priority for communities because of concerns about potential health effects. Most of ARB's air toxics data is collected through the toxic "Hot Spots" program. Local air districts collect emissions data from industrial and commercial facilities. Facilities that exceed health-based thresholds are required to report their air toxics emissions as part of the toxic "Hot Spots" program and update their emissions data every four years. Facilities are required to report their air toxics emissions data if there is an increase that would trigger the reporting threshold of the hotspots program. Air toxics emissions from motor vehicles and consumer products are estimated by the ARB. These estimates are generally regional in nature, reflecting traffic and population.

The ARB also maintains chemical speciation profiles that can be used to estimate toxics emissions when no toxic emissions data is available.

What additional toxic emissions information is needed?

In order to assess cumulative air pollution impacts, updated information from individual facilities is needed. Even for sources where emissions data are available, additional information such as the location of emissions release points is often needed to better model cumulative impacts. In terms of motor vehicles, emissions data are currently based on traffic models that only contain major roads and freeways. Local traffic data are needed so that traffic emissions can be more accurately assigned to specific streets and roads. Local information is also needed for off-road emission sources, such as ships, trains, and construction equipment. In addition, hourly maximum emissions data are needed for assessing acute air pollution impacts.

What work is underway?

ARB is working with CAPCOA to improve toxic emissions data, developing a community health air pollution information system to improve access to emission information, conducting neighborhood assessment studies to better understand toxic emission sources, and conducting surveys of sources of toxic pollutants.

How is air pollution monitored?

While emissions data identify how much air pollution is going into the air, the state's air quality monitoring network measures air pollutant levels in outdoor air. The statewide air monitoring network is primarily designed to measure regional exposure to air pollutants, and consists of more than 250 air monitoring sites.

The air toxics monitoring network consists of approximately 20 permanent sites. These sites are supplemented by special monitoring studies conducted by ARB and local air districts. These sites measure approximately sixty toxic air pollutants. Diesel PM, which is the major driver of urban air toxic risk, is not monitored directly. Ten of the

60 toxic pollutants, not including diesel, account for most of the remaining potential cancer risk in California urban areas.

What additional monitoring has been done?

Recently, additional monitoring has been done to look at air quality at the community level. ARB's community monitoring was conducted in six communities located throughout the state. Most sites were in low-income, minority communities located near major sources of air pollution, such as refineries or freeways. The monitoring took place for a year or more in each community, and included measurements of both criteria and toxic pollutants.

What is being learned from community monitoring?

In some cases, the ARB or local air districts have performed air quality monitoring or modeling studies covering a particular region of the state. When available, these studies can give information about regional air pollution exposures.

The preliminary results of ARB's community monitoring are providing insights into air pollution at the community level. Urban background levels are a major contributor to the overall risk from air toxics in urban areas, and this urban background tends to mask the differences between communities. When localized elevated air pollutant levels were measured, they were usually associated with local ground-level sources of toxic pollutants. The most common source of this type was busy streets and freeways. The impact these ground-level sources had on local air quality decreased rapidly with distance from the source. Pollutant levels usually returned to urban background levels within a few hundred meters of the source.

These results indicate that tools to assess cumulative impacts must be able to account for both localized, near-source impacts, as well as regional background air pollution. The tools that ARB is developing for this purpose are air quality models.

How can air quality modeling be used?

While air monitoring can directly measure cumulative exposure to air pollution, it is limited because all locations cannot be monitored. To address this, air quality modeling provides the capability to estimate exposure when air monitoring is not feasible. Air quality modeling can be refined to assess local exposure, identify locations of potential hot spots, and identify the relative contribution of emission sources to exposure at specific locations. The ARB has used this type of information to develop regional cumulative risk maps that estimate the cumulative cancer air pollution risk for most of California. While these maps only show one air pollution-related health risk, it does provide a useful starting point.

What is needed for community modeling?

Air quality models have been developed to assess near-source impacts, but they have very exacting data requirements. These near-source models estimate the impact of local sources, but do not routinely include the contribution from regional air pollution background. To estimate cumulative air pollution exposure at a neighborhood scale, a modeling approach needs to combine features of both micro-scale and regional models.

In addition, improved methods are needed to assess near-source impacts under light and variable wind conditions, when high local concentrations are more likely to occur. A method for modeling long-term exposure to air pollutants near freeways and other high traffic areas is also needed.

What modeling work has ARB developed?

A key component of ARB's Community Health Program is the Neighborhood Assessment Program (NAP). As described later in this section, the NAP studies are being conducted to better understand pollution impacts at the community level. Through two such studies conducted in Barrio Logan (San Diego) and Wilmington (Los Angeles), ARB is refining community-level modeling methodologies. Regional air toxics modeling is also being performed to better understand regional air pollution background levels.

In a parallel effort, ARB is developing modeling protocols for estimating cumulative emissions, exposure, and risk from air pollution. The protocols will cover modeling approaches and uncertainties, procedures for running the models, the development of statewide risk maps, and methods for estimating health risks. The protocols are subject to an extensive peer review process prior to release.

How are air pollution impacts on community health assessed?

On a statewide basis, ARB's toxic air contaminant program identifies and reduces public exposure to air toxics. The focus of the program has been on reducing potential cancer risk, because monitoring results show potential urban cancer risk levels are too high. ARB has also looked for potential non-cancer risks based on health reference levels provided by OEHHA. On a regional basis, the pollutants measured in ARB's toxic monitoring network are generally below the OEHHA non-cancer reference exposure levels.

As part of its community health program, the ARB is looking at potential cancer and non-cancer risk. This could include chronic or acute health effects. If the assessment work shows elevated exposures on a localized basis, ARB will work with OEHHA to assess the health impacts.

What tools has ARB developed to assess cumulative air pollution impacts?

ARB has developed the following tools and reports to assist land use agencies and local air districts assess and reduce cumulative emissions, exposure, and risk on a neighborhood scale.

Statewide Risk Maps

ARB has produced regional risk maps that show the statewide trends for Southern and Central California in estimated potential cancer risk from air toxics between 1990 and 2010.[2] These maps will supplement U.S. EPA's ASPEN model and are available on the ARB's Internet site. These maps are best used to obtain an estimate of the regional background air pollution health risk and are not detailed enough to estimate the exact risk at a specific location.

ARB also has maps that focus in more detail on smaller areas that fall within the Southern and Central California regions for these same modeled years. The finest visual resolution available in the maps on this web site is two by two kilometers. These maps are not detailed enough to assess individual neighborhoods or facilities.

Community Health Air Pollution Information System (CHAPIS)

CHAPIS is an Internet-based procedure for displaying information on emissions from sources of air pollution in an easy to use mapping format. CHAPIS uses Geographical Information System (GIS) software to deliver interactive maps over the Internet. CHAPIS relies on emission estimates reported to the ARB's emission inventory database - California Emissions Inventory Development and Reporting System, or CEIDARS.

Through CHAPIS, air district staff can quickly and easily identify pollutant sources and emissions within a specified area. CHAPIS contains information on air pollution emissions from selected large facilities and small businesses that emit criteria and toxic air pollutants. It also contains information on air pollution emissions from motor vehicle and areawide emissions. CHAPIS does not contain information on every source of air pollution or every air pollutant. It is a major long-term objective of CHAPIS to include all of the largest air pollution sources and those with the highest documented air pollution risk. CHAPIS will be updated on a periodic basis and additional facilities will be added to CHAPIS as more data becomes available.

CHAPIS is being developed in stages to assure data quality. The initial release of CHAPIS will include facilities emitting 10 or more tons per year of nitrogen oxides, sulfur dioxide, carbon monoxide, PM10, or reactive organic gases; air toxics from refineries and power plants of 50 megawatts or more; and facilities that conducted health risk

[2]ARB maintains state trends and local potential cancer risk maps that show statewide trends in potential inhalable cancer risk from air toxics between 1990 and 2010. This information can be viewed at ARB's web site at http://www.arb.ca.gov/toxics/cti/hlthrisk/hlthrisk.htm)

assessments under the California Air Toxics "Hot Spots" Information and Assessment Program.[3]

CHAPIS can be used to identify the emission contributions from mobile, area, and point sources on that community.

"Hot Spots" Analysis and Reporting Program (HARP)

HARP[4] is a software package available from the ARB and is designed with air quality professionals in mind. It models emissions and release data from one or more facilities to estimate the potential health risk posed by the selected facilities on the neighboring community. HARP uses the latest risk assessment guidelines published by OEHHA.

With HARP, a user can perform the following tasks:

- Create and manage facility databases;
- Perform air dispersion modeling;
- Conduct health risk analyses;
- Output data reports; and
- Output results to GIS mapping software.

HARP can model downwind concentrations of air toxics based on the calculated emissions dispersion at a single facility. HARP also has the capability of assessing the risk from multiple facilities, and for multiple locations of concern near those facilities. While HARP has the capability to assess multiple source impacts, there had been limited application of the multiple facility assessment function in the field at the time of HARP's debut in 2003. HARP can also evaluate multi-pathway, non-inhalation health risk resulting from air pollution exposure, including skin and soil exposure, and ingestion of meat and vegetables contaminated with air toxics, and other toxics that have accumulated in a mother's breast milk.

Neighborhood Assessment Program (NAP)

The NAP[5] has been a key component of ARB's Community Health Program. It includes the development of tools that can be used to perform assessments of cumulative air pollution impacts on a neighborhood scale. The NAP studies have been done to better understand how air pollution affects individuals at the neighborhood level. Thus far, ARB has conducted neighborhood scale assessments in Barrio Logan and Wilmington.

As part of these studies, ARB is collecting data and developing a modeling protocol that can be used to conduct cumulative air pollution impact assessments. Initially these

[3] California Health & Safety Code section 44300, et seq.
[4] More detailed information can be found on ARB's website at: http://www.arb.ca.gov/toxics/harp/harp.htm
[5] For more information on the Program, please refer to: http://www.arb.ca.gov/ch/programs/nap/nap.htm

assessments will focus on cumulative inhalation cancer health risk and chronic non-cancer impacts. The major challenge is developing modeling methods that can combine both regional and localized air pollution impacts, and identifying the critical data necessary to support these models. The objective is to develop methods and tools from these studies that can ultimately be applied to other areas of the state. In addition, the ARB plans to use these methods to replace the ASPEN regional risk maps currently posted on the ARB Internet site.

Urban Emissions Model (URBEMIS)

URBEMIS[6] is a computer program that can be used to estimate emissions associated with land development projects in California such as residential neighborhoods, shopping centers, office buildings, and construction projects. URBEMIS uses emission factors available from the ARB to estimate vehicle emissions associated with new land uses. URBEMIS estimates sulfur dioxide emissions from motor vehicles in addition to reactive organic gases, nitrogen oxides, carbon monoxide, and PM10.

Land-Use Air Quality Linkage Report[7]

This report summarizes data currently available on the relationships between land use, transportation and air quality. It also highlights strategies that can help to reduce the use of the private automobile. It also briefly summarizes two ARB-funded research projects. The first project analyzes the travel patterns of residents living in five higher density, mixed use neighborhoods in California, and compares them to travel in more auto-oriented areas. The second study correlates the relationship between travel behavior and community characteristics, such as density, mixed land uses, transit service, and accessibility for pedestrians.

[6] For more information on this model, please refer to ARB's website at http://www.arb.ca.gov/html/soft.htm.

[7] To access this report, please refer to ARB's website or click on: http://www.arb.ca.gov/ch/programs/link97.pdf

LAND USE AND AIR QUALITY AGENCY ROLES IN THE LAND USE PROCESS

A wide variety of federal, state, and local government agencies are responsible for regulatory, planning, and siting decisions that can have an impact on air pollution. They include local land use agencies, regional councils of government, school districts, local air districts, ARB, the California Department of Transportation (Caltrans), and the Governor's Office of Planning and Research (OPR) to name a few. This Section will focus on the roles and responsibilities of local and state agencies. The role of school districts will be discussed in Appendix E.

Local Land Use Agencies

Under the State Constitution, land use agencies have the primary authority to plan and control land use.[1] Each of California's incorporated cities and counties are required to adopt a comprehensive, long-term General Plan.[2]

The General Plan's long-term goals are implemented through zoning ordinances. These are local laws adopted by counties and cities that describe for specific areas the kinds of development that will be allowed within their boundaries.

Land use agencies are also the lead for doing environmental assessments under CEQA for new projects that may pose a significant environmental impact, or for new or revised General Plans.

Local Agency Formation Commissions (LAFCOs)

Operating in each of California's 58 counties, LAFCOs are composed of local elected officials and public members who are responsible for coordinating changes in local governmental boundaries, conducting special studies that review ways to reorganize, simplify, and streamline governmental structures, and preparing a sphere of influence for each city and special district within each county. Each Commission's efforts are directed toward seeing that local government services are provided efficiently and economically while agricultural and open-space lands are protected. LAFCO decisions strive to balance the competing needs in California for efficient services, affordable housing, economic opportunity, and conservation of natural resources.

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[1] The legal basis for planning and land use regulation is the "police power" of the city or county to protect the public's health, safety and welfare. The California Constitution gives cities and counties the power to make and enforce all local police, sanitary and other ordinances and regulations not in conflict with general laws. State law reference: California Constitution, Article XI §7.

[2] OPR General Plan Guidelines, 2003: http://www.opr.ca.gov/planning/PDFs/General_Plan_Guidelines_2003.pdf

Councils of Government (COG)

COGs are organizations composed of local counties and cities that serve as a focus for the development of sound regional planning, including plans for transportation, growth management, hazardous waste management, and air quality. They can also function as the metropolitan planning organization for coordinating the region's transportation programs. COGs also prepare regional housing need allocations for updates of General Plan housing elements.

Local Air Districts

Under state law, air pollution control districts or air quality management districts (local air districts) are the local government agencies responsible for improving air quality and are generally the first point of contact for resolving local air pollution issues or complaints. There are 35 local air districts in California[3] that have authority and primary responsibility for regional clean air planning. Local air districts regulate stationary sources of air pollutants within their jurisdiction including but not limited to industrial and commercial facilities, power plants, construction activities, outdoor burning, and other non-mobile sources of air pollution. Some local air districts also regulate public and private motor vehicle fleet operators such as public bus systems, private shuttle and taxi services, and commercial truck depots.

- **Regional Clean Air Plans**

Local air districts are responsible for the development and adoption of clean air plans that protect the public from the harmful effects of air pollution. These plans incorporate strategies that are necessary to attain ambient air quality standards. Also included in these regional air plans are ARB and local district measures to reduce statewide emissions from mobile sources, consumer products, and industrial sources.

- **Facility-Specific Considerations**

Permitting. In addition to the planning function, local air districts adopt and enforce regulations, issue permits, and evaluate the potential environmental impacts of projects.

Pollution is regulated through permits and technology-based rules that limit emissions from operating units within a facility or set standards that vehicle fleet operators must meet. Permits to construct and permits to operate contain very specific requirements and conditions that tell each regulated source what it must do to limit its air pollution in compliance with local air district rules, regulations, and state law. Prior to receiving a permit, new facilities must go through a New Source Review (NSR) process that establishes air pollution control requirements for the facility. Permit conditions are typically contained in the permit to operate and specify requirements that businesses must follow; these may include limits on the amount of pollution that can be emitted, the

[3] Contact information for local air districts in California is listed in the front of this Handbook.

type of pollution control equipment that must be installed and maintained, and various record-keeping requirements.

Local air districts also notify the public about new permit applications for major new facilities, or major modifications to existing facilities that seek to locate within 1,000 feet of a school.

Local air districts can also regulate other types of sources to reduce emissions. These include regulations to reduce emissions from the following sources:

- hazardous materials in products used by industry such as paints, solvents, and de-greasers;
- agricultural and residential burning;
- leaking gasoline nozzles at service stations;
- public fleet vehicles such as sanitation trucks and school buses; and
- fugitive or uncontrolled dust at construction sites.

However, while emissions from industrial and commercial sources are typically subject to the permit authority of the local air district, sensitive sites such as a day care center, convalescent home, or playground are not ordinarily subject to an air permit. Local air district permits address the air pollutant emissions of a project but not its location.

Under the state's air toxics program, local air districts regulate air toxic emissions by adopting ARB air toxic control measures, or more stringent district-specific requirements, and by requiring individual facilities to perform a health risk assessment if emissions at the source exceed district-specific health risk thresholds[4], [5] (See the section on ARB programs for a more detailed summary of this program).

One approach by which local air districts regulate air toxics emissions is through the "Hot Spots" program.[6] The risk assessments submitted by the facilities under this

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[4] Cal/EPA's Office of Environmental Health Hazard Assessment has published "A Guide to Health Risk Assessment" for lay people involved in environmental health issues, including policymakers, businesspeople, members of community groups, and others with an interest in the potential health effects of toxic chemicals. To access this information, please refer to http://www.oehha.ca.gov/pdf/HRSguide2001.pdf

[5] Section 44306 of the California Health & Safety Code defines a health risk assessment as a detailed comprehensive analysis that a polluting facility uses to evaluate and predict the dispersion of hazardous substances in the environment and the potential for exposure of human populations, and to assess and quantify both the individual and population-wide health risks associated with those levels of exposure.

[6] AB-2588 (the Air Toxics "Hot Spots" Information and Assessment Act) requires local air districts to prioritize facilities by high, intermediate, and low priority categories to determine which must perform a health risk assessment. Each district is responsible for establishing the prioritization score threshold at which facilities are required to prepare a health risk assessment. In establishing priorities for each facility, local air districts must consider the potency, toxicity, quantity, and volume of hazardous materials released from the facility, the proximity of the facility to potential receptors, and any other factors that the district determines may indicate that the facility may pose a significant risk. All facilities within the highest category must prepare a health risk assessment. In addition, each district may require facilities in the intermediate and low priority categories to also submit a health risk assessment.

Table D-1
Local Sources of Air Pollution, Responsible Agencies, and Associated Regulatory Programs

Source	Examples	Primary Agency	Applicable Regulations
Large Stationary	Refineries, power plants, chemical facilities, certain manufacturing plants	Local air districts	Operating permit rules Air Toxics "Hot Spots" Law (AB 2588) Local district rules Air Toxic Control Measures (ATCMs)* New Source Review rules Title V permit rules
Small Stationary	Dry cleaners, auto body shops, welders, chrome plating facilities, service stations, certain manufacturing plants	Local air districts	Operating permit conditions, Air Toxics "Hot Spots" Law (AB 2588) Local district rules ATCMs* New Source Review rules
Mobile (non-fleet)	Cars, trucks, buses	ARB	Emission standards Cleaner-burning fuels (e.g., unleaded gasoline, low-sulfur diesel) Inspection and repair programs (e.g., Smog Check)
Mobile Equipment	Construction equipment	ARB, U.S. EPA	ARB rules U.S. EPA rules
Mobile (fleet)	Truck depots, school buses, taxi services	Local air districts, ARB	Local air district rules ARB urban bus fleet rule
Areawide	Paints and consumer products such as hair spray and spray paint	Local air district, ARB	ARB rules Local air district rules

*ARB adopts ATCMs, but local air districts have the responsibility to implement and enforce these measures or more stringent ones.

program are reviewed by OEHHA and approved by the local air district. Risk assessments are available by contacting the local air district.

Enforcement. Local air districts also take enforcement action to ensure compliance with air quality requirements. They enforce air toxic control measures, agricultural and residential burning programs, gasoline vapor control regulations, laws that prohibit air pollution nuisances, visible emission limits, and many other requirements designed to

clean the air. Local districts use a variety of enforcement tools to ensure compliance. These include notices of violation, monetary penalties, and abatement orders. Under some circumstances, a permit may be revoked.

- **Environmental Review**

As required by the California Environmental Quality Act (CEQA), local air districts also review and comment on proposed land use plans and development projects that can have a significant effect on the environment or public health.[7]

California Air Resources Board

The ARB is the air pollution control agency at the state level that is responsible for the preparation of air plans required by state and federal law. In this regard, it coordinates the activities of all local air districts to ensure all statutory requirements are met and to reduce air pollution emissions for sources under its jurisdiction.

Motor vehicles are the single largest emissions source category under ARB's jurisdiction as well as the largest overall emissions source statewide. ARB also regulates emissions from other mobile equipment and engines as well as emissions from consumer products such as hair sprays, perfumes, cleaners, and aerosol paints.

Air Toxics Program

Under state law, the ARB has a critical role to play in the identification, prioritization, and control of air toxic emissions. The ARB statewide comprehensive air toxics program was established in the early 1980's. The Toxic Air Contaminant Identification and Control Act of 1983 (AB 1807, Tanner 1983) created California's program to reduce exposure to air toxics.[8] The Air Toxics "Hot Spots" Information and Assessment Act (Hot Spots program) supplements the AB 1807 program, by requiring a statewide air toxics inventory, notification of people exposed to a significant health risk, and facility plans to reduce these risks.

Under AB 1807, the ARB is required to use certain criteria to prioritize the identification and control of air toxics. In selecting substances for review, the ARB must consider criteria relating to emissions, exposure, and health risk, as well as persistence in the atmosphere, and ambient concentrations in the community. AB 1807 also requires the ARB to use available information gathered from the Hot Spots program when prioritizing compounds.

The ARB identifies pollutants as toxic air contaminants and adopts statewide air toxic control measures (ATCMs). Once ARB adopts an ATCM, local air districts must

[7] Section 4 of this Handbook contains more information on the CEQA process.
[8] For a general background on California's air toxics program, the reader should refer to ARB's website at http://www.arb.ca.gov/toxics/tac/appendxb.htm.

implement the measure, or adopt and implement district-specific measures that are at least as stringent as the state standard. Taken in the aggregate, these ARB programs will continue to further reduce emissions, exposure, and health risk statewide.

With regard to the land use decision-making process, ARB, in conjunction with local air districts, plays an advisory role by providing technical information on land use-related air issues.

Other Agencies

Governor's Office of Planning and Research (OPR)

In addition to serving as the Governor's advisor on land use planning, research, and liaison with local government, OPR develops and implements the state's policy on land use planning and coordinates the state's environmental justice programs. OPR updated its General Plan Guidelines in 2003 to highlight the importance of sustainable development and environmental justice policies in the planning process. OPR also advises project proponents and government agencies on CEQA provisions and operates the State Clearinghouse for environmental and federal grant documents.

California Department of Housing and Community Development

The Department of Housing and Community Development (HCD) administers a variety of state laws, programs and policies to preserve and expand housing opportunities, including the development of affordable housing. All local jurisdictions must update their housing elements according to a staggered statutory schedule, and are subject to certification by HCD. In their housing elements, cities and counties are required to include a land inventory which identifies and zones sites for future residential development to accommodate a mix of housing types, and to remove barriers to the development of housing.

An objective of state housing element law is to increase the overall supply and affordability of housing. Other fundamental goals include conserving existing affordable housing, improving the condition of the existing housing stock, removing regulatory barriers to housing production, expanding equal housing opportunities, and addressing the special housing needs of the state's most vulnerable residents (frail elderly, disabled, large families with children, farmworkers, and the homeless).

Transportation Agencies

Transportation agencies can also influence mobile source-related emissions in the land use decision-making process. Local transportation agencies work with land use agencies to develop a transportation (circulation) element for the General Plan. These local government agencies then work with other transportation-related agencies, such as the Congestion Management Agency (CMA), Metropolitan Planning Organization

(MPO), Regional Transportation Planning Agency (RTPA), and Caltrans to develop long and short range transportation plans and projects.

Caltrans is the agency responsible for setting state transportation goals and for state transportation planning, design, construction, operations and maintenance activities. Caltrans is also responsible for delivering California's multibillion-dollar state Transportation Improvement Program, a list of transportation projects that are approved for funding by the California Transportation Commission in a 4-year cycle.

When safety hazards or traffic circulation problems are identified in the existing road system, or when land use changes are proposed such as a new residential subdivision, shopping mall or manufacturing center, Caltrans and/or the local transportation agency ensure the projects meet applicable state, regional, and local goals and objectives.

Caltrans also evaluates transportation-related projects for regional air quality impacts, from the perspective of travel-related emissions as well as road congestion and increases in road capacity (new lanes).

California Energy Commission (CEC)

The CEC is the state's CEQA lead agency for permitting large thermal power plants (50 megawatts or greater). The CEC works closely with local air districts and other federal, state and local agencies to ensure compliance with applicable laws, ordinances, regulations and standards in the permitting, construction, operation and closure of such plants. The CEC uses an open and public review process that provides communities with outreach and multiple opportunities to participate and be heard. In addition to its comprehensive environmental impact and engineering design assessment process, the CEC also conducts an environmental justice evaluation. This evaluation involves an initial demographic screening to determine if a qualifying minority or low-income population exists in the vicinity of the proposed project. If such a population is present, staff considers possible environmental justice impacts including from associated project emissions in its technical assessments.[9]

Department of Pesticides Regulation (DPR)

Pesticides are industrial chemicals produced specifically for their toxicity to a target pest. They must be released into the environment to do their job. Therefore, regulation of pesticides focuses on using toxicity and other information to ensure that when pesticides are used according to their label directions, potential for harm to people and the environment is minimized. DPR imposes strict controls on use, beginning before pesticide products can be sold in California, with an extensive scientific program to ensure they can be used safely. DPR and county enforcement staff tracks the use of pesticides to ensure that pesticides are used properly. DPR collects periodic

[9] See California Energy Commission, "Environmental Performance Report," July 2001 at http://www.energy.ca.gov/reports/2001-11-20_700-01-001.PDF

measurements of any remaining amounts of pesticides in water, air, and on fresh produce. If unsafe levels are found, DPR requires changes in how pesticides are used, to reduce the possibility of harm. If this cannot be done - that is, if a pesticide cannot be used safely - use of the pesticide will be banned in California.[10]

Federal Agencies

Federal agencies have permit authority over activities on federal lands and certain resources, which have been the subject of congressional legislation, such as air, water quality, wildlife, and navigable waters. The U.S. Environmental Protection Agency generally oversees implementation of the federal Clean Air Act, and has broad authority for regulating certain activities such as mobile sources, air toxics sources, the disposal of toxic wastes, and the use of pesticides. The responsibility for implementing some federal regulatory programs such as those for air and water quality and toxics is delegated by management to specific state and local agencies. Although federal agencies are not subject to CEQA they must follow their own environmental process established under the National Environmental Policy Act (NEPA).

[10] For more information, the reader is encouraged to visit the Department of Pesticide Regulation web site at www.cdpr.ca.gov/docs/empm/pubs/tacmenu.htm.

SPECIAL PROCESSES THAT APPLY TO SCHOOL SITING

The California Education Code and the California Public Resources Code place primary authority for siting public schools with the local school district, which is the 'lead agency' for purposes of CEQA. The California Education Code requires public school districts to notify the local planning agency about siting a new public school or expanding an existing school. The planning agency then reports back to the school district regarding a project's conformity with the adopted General Plan. However, school districts can overrule local zoning and land use designations for schools if they follow specified procedures. In addition, all school districts must evaluate new school sites using site selection standards established in Section 14010 of Title 5 of the California Code of Regulations. Districts seeking state funding for school site acquisition must also obtain site approval from the California Department of Education.

Before making a final decision on a school site acquisition, a school district must comply with CEQA and evaluate the proposed site acquisition/new school project for air emissions and health risks by preparing and certifying an environmental impact report or negative declaration. Both the California Education Code section 17213 and the California Public Resources Code section 21151.8 require school districts to consult with administering agencies and local air districts when preparing the environmental assessment. Such consultation is required to identify both permitted and non-permitted "facilities" that might significantly affect health at the new site. These facilities include, but are not limited to, freeways and other busy traffic corridors, large agricultural operations, and rail yards that are within one-quarter mile of the proposed school site, and that might emit hazardous air emissions, or handle hazardous or acutely hazardous materials, substances, or waste.

As part of the CEQA process and before approving a school site, the school district must make a finding that either it found none of the facilities or significant air pollution sources, or alternatively, if the school district finds that there are such facilities or sources, it must determine either that they pose no significant health risks, or that corrective actions by another governmental entity would be taken so that there would be no actual or potential endangerment to students or school workers.

In addition, if the proposed school site boundary is within 500 feet of the edge of the closest traffic lane of a freeway or traffic corridor that has specified minimum average daily traffic counts, the school district is required to determine through specified risk assessment and air dispersion modeling that neither short-term nor long term exposure poses significant heath risks to pupils.

State law changes effective January 1, 2004 (SB352, Escutia 2003, amending Education Code section 17213 and Public Resources Code section 21151.8) also provides for cases in which the school district cannot make either of those two findings and cannot find a suitable alternative site. When this occurs, the school district must adopt a statement of over-riding considerations, as part of an environmental impact

report, that the project should be approved based on the ultimate balancing of the merits.

Some school districts use a standardized assessment process to determine the environmental impacts of a proposed school site. In the assessment process, school districts can use maps and other available information to evaluate risk, including a local air district's database of permitted source emissions. School districts can also perform field surveys and record searches to identify and calculate emissions from non-permitted sources within one-quarter mile radius of a proposed site. Traffic count data and vehicular emissions data can also be obtained from Caltrans for major roadways and freeways in proximity to the proposed site to model potential emissions impacts to students and school employees. This information is available from the local COG, Caltrans, or local cities and counties for non-state maintained roads.

GENERAL PROCESSES USED BY LAND USE AGENCIES TO ADDRESS AIR POLLUTION IMPACTS

There are several separate but related processes for addressing the air pollution impacts of land use projects. One takes place as part of the planning and zoning function. This consists of preparing and implementing goals and policies contained in county or city General Plans, community or area plans, and specific plans governing land uses such as residential, educational, commercial, industrial, and recreational activities. It also includes recommending locations for thoroughfares, parks and other public improvements.

Land use agencies also have a permitting function that includes performing environmental reviews and mitigation when projects may pose a significant environmental impact. They conduct inspections for zoning permits issued, enforce the zoning regulations and issue violations as necessary, issue zoning certificates of compliance, and check compliance when approving certificates of occupancy.

Planning

- **General Plan**[1]

The General Plan is a local government "blueprint" of existing and future anticipated land uses for long-term future development. It is composed of the goals, policies, and general elements upon which land use decisions are based. Because the General Plan is the foundation for all local planning and development, it is an important tool for implementing policies and programs beneficial to air quality. Local governments may choose to adopt a separate air quality element into their General Plan or to integrate air quality-beneficial objectives, policies, and strategies in other elements of the Plan, such as the land use, circulation, conservation, and community design elements.

More information on General Plan elements is contained in Appendix D.

- **Community Plans**

Community or area plans are terms for plans that focus on a particular region or community within the overall general plan area. It refines the policies of the general plan as they apply to a smaller geographic area and is implemented by ordinances and other discretionary actions, such as zoning.

[1] In October 2003, OPR revised its General Plan Guidelines. An entire chapter is now devoted to a discussion of how sustainable development and environmental justice goals can be incorporated into the land use planning process. For further information, the reader is encouraged to obtain a copy of OPR's General Plan Guidelines, or refer to their website at: http://www.opr.ca.gov/planning/PDFs/General_Plan_Guidelines_2003.pdf

- **Specific Plan**

A specific plan is a hybrid that can combine policies with development regulations or zoning requirements. It is often used to address the development requirements for a single project such as urban infill or a planned community. As a result, its emphasis is on concrete standards and development criteria.

- **Zoning**

Zoning is the public regulation of the use of land. It involves the adoption of ordinances that divide a community into various districts or zones. For instance, zoning ordinances designate what projects and activities can be sited in particular locations. Each zone designates allowable uses of land within that zone, such as residential, commercial, or industrial. Zoning ordinances can address building development standards, e.g., minimum lot size, maximum building height, minimum building setback, parking, signage, density, and other allowable uses.

Land Use Permitting

In addition to the planning and zoning function, land use agencies issue building and business permits, and evaluate the potential environmental impacts of projects. To be approved, projects must be located in a designated zone and comply with applicable ordinances and zoning requirements.

Even if a project is sited properly in a designated zone, a land use agency may require a new source to mitigate potential localized environmental impacts to the surrounding community below what would be required by the local air district. In this case, the land use agency could condition the permit by limiting or prescribing allowable uses including operating hour restrictions, building standards and codes, property setbacks between the business property and the street or other structures, vehicle idling restrictions, or traffic diversion.

Land use agencies also evaluate the environmental impacts of proposed land use projects or activities. If a project or activity falls under CEQA, the land use agency requires an environmental review before issuing a permit to determine if there is the potential for a significant impact, and if so, to mitigate the impact or possibly deny the project.

- **Land Use Permitting Process**

In California, the authority to regulate land use is delegated to city and county governments. The local land use planning agency is the local government administrative body that typically provides information and coordinates the review of development project applications. Conditional Use Permits (CUP) typically fall within a land use agency's discretionary authority and therefore are subject to CEQA. CUPs are

intended to provide an opportunity to review the location, design, and manner of development of land uses prior to project approval. A traditional purpose of the CUP is to enable a municipality to control certain uses that could have detrimental environmental effects on the community.

The process for permitting new discretionary projects is quite elaborate, but can be broken down into five fundamental components:

- Project application
- Environmental assessment
- Consultation
- Public comment
- Public hearing and decision

Project Application

The permit process begins when the land use agency receives a project application, with a detailed project description, and support documentation. During this phase, the agency reviews the submitted application for completeness. When the agency deems the application to be complete, the permit process moves into the environmental review phase.

Environmental Assessment

If the project is discretionary and the application is accepted as complete, the project proposal or activity must undergo an environmental clearance process under CEQA and the CEQA Guidelines adopted by the California Resources Agency.[2] The purpose of the CEQA process is to inform decision-makers and the public of the potential significant environmental impacts of a project or activity, to identify measures to minimize or eliminate those impacts to the point they are no longer significant, and to discuss alternatives that will accomplish the project goals and objectives in a less environmentally harmful manner.

What is a "Lead Agency"?

A lead agency is the public agency that has the principal responsibility for carrying out or approving a project that is subject to CEQA. In general, the land use agency is the preferred public agency serving as lead agency because it has jurisdiction over general land uses. The lead agency is responsible for determining the appropriate environmental document, as well as its preparation.

What is a "Responsible Agency"?

A responsible agency is a public agency with discretionary approval authority over a portion of a CEQA project (e.g., projects requiring a permit). As a responsible agency, the agency is available to the lead agency and project proponent for early consultation on a project to apprise them of applicable rules and regulations, potential adverse impacts, alternatives, and mitigation measures, and provide guidance as needed on applicable methodologies or other related issues.

What is a "Commenting Agency"?

A commenting agency is any public agency that comments on a CEQA document, but is neither a lead agency nor a responsible agency. For example, a local air district, as the agency with the responsibility for comprehensive air pollution control, could review and comment on an air quality analysis in a CEQA document for a proposed distribution center, even though the project was not subject to a permit or other pollution control requirements.

[2] Projects and activities that may have a significant adverse impact on the environment are evaluated under CEQA Guidelines set forth in title 14 of the California Code of Regulations, sections 15000 et seq.

To assist the lead agency in determining whether the project or activity may have a significant effect that would require the preparation of an EIR, the land use agency may consider criteria, or thresholds of significance, to assess the potential impacts of the project, including its air quality impacts. The land use agency must consider any credible evidence in addition to the thresholds, however, in determining whether the project or activity may have a significant effect that would trigger the preparation of an EIR.

The screening criteria to determine significance is based on a variety of factors, including local, state, and federal regulations, administrative practices of other public agencies, and commonly accepted professional standards. However, the final determination of significance for individual projects is the responsibility of the lead agency. In the case of land use projects, the lead agency would be the City Council or County Board of Supervisors.

A new land use plan or project can also trigger an environmental assessment under CEQA if, among other things, it will expose sensitive sites such as schools, day care centers, hospitals, retirement homes, convalescence facilities, and residences to substantial pollutant concentrations.[3]

CEQA only applies to "discretionary projects." Discretionary means the public agency must exercise judgment and deliberation when deciding to approve or disapprove a particular project or activity, and may append specific conditions to its approval. Examples of discretionary projects include the issuance of a CUP, re-zoning a property, or widening of a public road. Projects that are not subject to the exercise of agency discretion, and can therefore be approved administratively through the application of set standards are referred to as ministerial projects. CEQA does not apply to ministerial projects.[4] Examples of typical ministerial projects include the issuance of most building permits or a business license.

Once a potential environmental impact associated with a project is identified through an environmental assessment, mitigation must be considered. A land use agency should incorporate mitigation measures that are suggested by the local air district as part of the project review process.

Consultation

Application materials are provided to various departments and agencies that may have an interest in the project (e.g., air pollution, building, police, fire, water agency, Fish and Game, etc.) for consultation and input.

[3] Readers interested in learning more about CEQA should contact OPR or visit their website at http://www.opr.ca.gov/.

[4] See California Public Resources Code section 21080(b)(1).

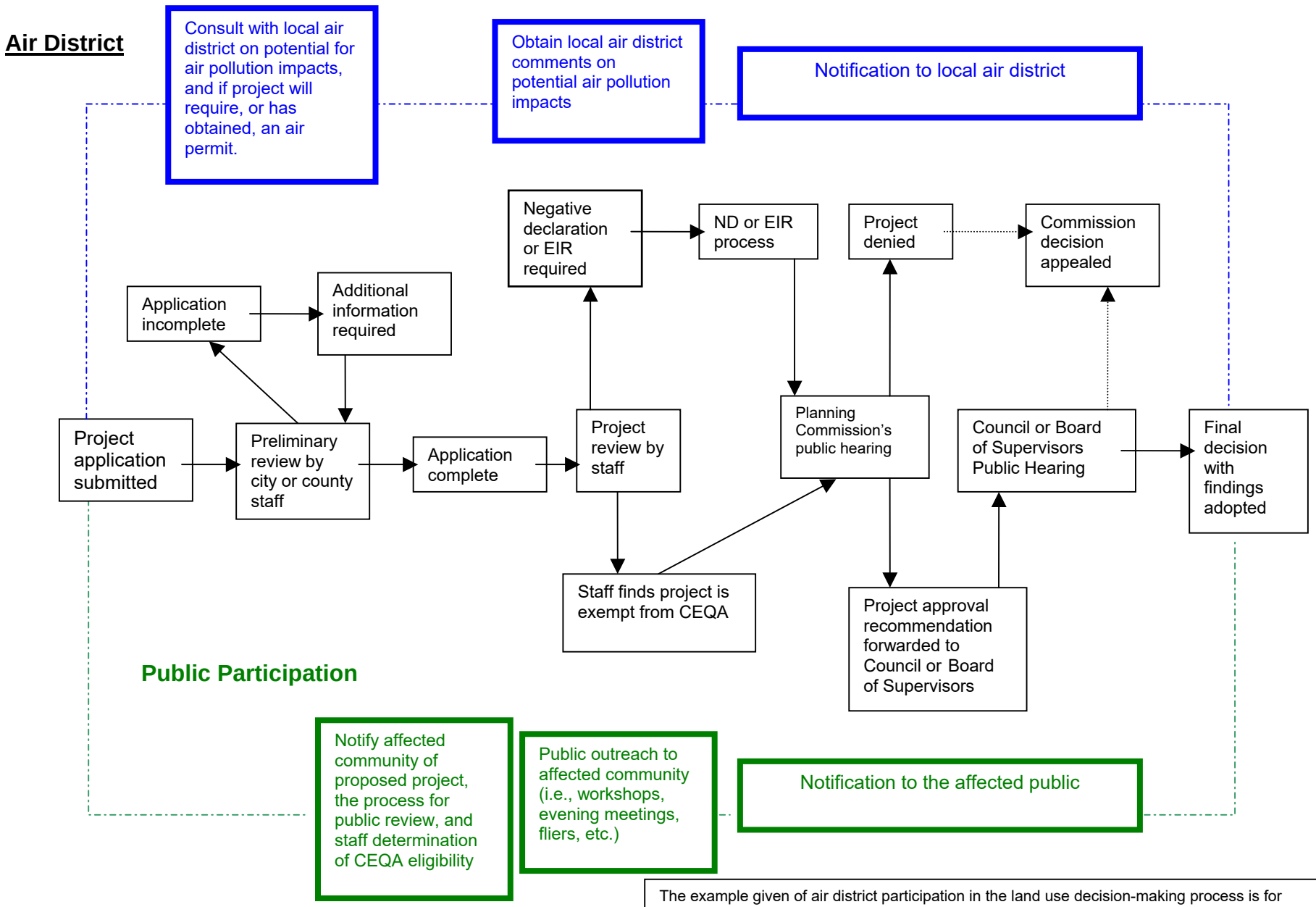
Public Comment

Following the environmental review process, the Planning Commission reviews application along with the staff's report on the project assessment and a public comment period is set and input is solicited.

Public Hearing and Decision

Permit rules vary depending on the particular permit authority in question, but the process generally involves comparing the proposed project with the land use agency standards or policies. The procedure usually leads to a public hearing, which is followed by a written decision by the agency or its designated officer. Typically, a project is approved, denied, or approved subject to specified conditions.

USE PERMIT (DISCRETIONARY ACTION) REVIEW PROCESS*



The example given of air district participation in the land use decision-making process is for illustrative purposes only. In reality, the land use siting process involves the ongoing participation of multiple affected agencies and stakeholders throughout the process.

GLOSSARY OF KEY AIR POLLUTION TERMS

Air Pollution Control Board or Air Quality Management Board: Serves as the governing board for local air districts. It consists of appointed or elected members from the public or private sector. It conducts public hearings to adopt local air pollution regulations.

Air Pollution Control Districts or Air Quality Management Districts (local air district): A county or regional agency with authority to regulate stationary and area sources of air pollution within a given county or region. Governed by a district air pollution control board.

Air Pollution Control Officer (APCO): Head of a local air pollution control or air quality management district.

Air Toxic Control Measures (ATCM): A control measure adopted by the ARB (Health and Safety Code section 39666 et seq.), which reduces emissions of toxic air contaminants.

Ambient Air Quality Standards: An air quality standard defines the maximum amount of a pollutant that can be present in the outdoor air during a specific time period without harming the public's health. Only U.S. EPA and the ARB may establish air quality standards. No other state has this authority. Air quality standards are a measure of clean air. More specifically, an air quality standard establishes the concentration at which a pollutant is known to cause adverse health effects to sensitive groups within the population, such as children and the elderly. Federal standards are referred to as National Ambient Air Quality Standards (NAAQS); state standards are referred to as California ambient air quality standards (CAAQS).

Area-wide Sources: Sources of air pollution that individually emit small amounts of pollution, but together add up to significant quantities of pollution. Examples include consumer products, fireplaces, road dust, and farming operations.

Attainment vs. Nonattainment Area: An attainment area is a geographic area that meets the National Ambient Air Quality Standards for the criteria pollutants and a non-attainment area is a geographic area that doesn't meet the NAAQS for criteria pollutants.

Attainment Plan: Attainment plans lay out measures and strategies to attain one or more air quality standards by a specified date.

California Clean Air Act (CCAA): A California law passed in 1988, which provides the basis for air quality planning and regulation independent of federal regulations. A major element of the Act is the requirement that local air districts in violation of the CAAQS

must prepare attainment plans which identify air quality problems, causes, trends, and actions to be taken to attain and maintain California's air quality standards by the earliest practicable date.

California Environmental Quality Act (CEQA): A California law that sets forth a process for public agencies to make informed decisions on discretionary project approvals. The process helps decision-makers determine whether any potential, significant, adverse environmental impacts are associated with a proposed project and to identify alternatives and mitigation measures that will eliminate or reduce such adverse impacts.[1]

California Health and Safety Code: A compilation of California laws, including state air pollution laws, enacted by the Legislature to protect the health and safety of people in California. Government agencies adopt regulations to implement specific provisions of the California Health and Safety Code.

Clean Air Act (CAA): The federal Clean Air Act was adopted by the United States Congress and sets forth standards, procedures, and requirements to be implemented by the U.S. Environmental Protection Agency (U.S. EPA) to protect air quality in the United States.

Councils of Government (COGs): There are 25 COGs in California made up of city and county elected officials. COGs are regional agencies concerned primarily with transportation planning and housing; they do not directly regulate land use.

Criteria Air Pollutant: An air pollutant for which acceptable levels of exposure can be determined and for which an ambient air quality standard has been set. Examples include ozone, carbon monoxide, nitrogen dioxide, sulfur dioxide, and PM10 and PM2.5. The term "criteria air pollutants" derives from the requirement that the U.S. EPA and ARB must describe the characteristics and potential health and welfare effects of these pollutants. The U.S. EPA and ARB periodically review new scientific data and may propose revisions to the standards as a result.

District Hearing Board: Hears local air district permit appeals and issues variances and abatement orders. The local air district board appoints the members of the hearing board.

Emission Inventory: An estimate of the amount of pollutants emitted into the atmosphere from mobile, stationary, area-wide, and natural source categories over a specific period of time such as a day or a year.

Environmental Impact Report (EIR): The public document used by a governmental agency to analyze the significant environmental effects of a proposed project, to identify

[1] To track the submittal of CEQA documents to the State Clearinghouse within the Office of Planning and Research, the reader can refer to CEQAnet at http://www.ceqanet.ca.gov.

alternatives, and to disclose possible ways to reduce or avoid the possible negative environmental impacts.

Environmental Justice: California law defines environmental justice as the fair treatment of people of people of all races, cultures, and incomes with respect to the development, adoption, implementation, and enforcement of environmental laws, regulations, and policies (California Government Code sec.65040.12(c)).

General Plans: A statement of policies developed by local governments, including text and diagrams setting forth objectives, principles, standards, and plan proposals for the future physical development of the city or county.

Hazardous Air Pollutants (HAPs): An air pollutant listed under section 112 (b) of the federal Clean Air Act as particularly hazardous to health. U.S. EPA identifies emission sources of hazardous air pollutants, and emission standards are set accordingly. In California, HAPs are referred to as toxic air contaminants.

Land Use Agency: Local government agency that performs functions associated with the review, approval, and enforcement of general plans and plan elements, zoning, and land use permitting. For purposes of this Handbook, a land use agency is typically a local planning department.

Mobile Source: Sources of air pollution such as automobiles, motorcycles, trucks, off-road vehicles, boats, and airplanes.

National Ambient Air Quality Standard (NAAQS): A limit on the level of an outdoor air pollutant established by the US EPA pursuant to the Clean Air Act. There are two types of NAAQS. Primary standards set limits to protect public health and secondary standards set limits to protect public welfare.

Negative Declaration (ND): When the lead agency (the agency responsible for preparing the EIR or ND) under CEQA, finds that there is no substantial evidence that a project may have a significant environmental effect, the agency will prepare a "negative declaration" instead of an EIR.

New Source Review (NSR): A federal Clean Air Act requirement that state implementation plans must include a permit review process, which applies to the construction and operation of new or modified stationary sources in nonattainment areas. Two major elements of NSR to reduce emissions are best available control technology requirements and emission offsets.

Office of Planning and Research (OPR): OPR is part of the Governor's office. OPR has a variety of functions related to local land-use planning and environmental programs. It provides General Plan Guidelines for city and county planners, and coordinates the state clearinghouse for Environmental Impact Reports.

Ordinance: A law adopted by a City Council or County Board of Supervisors. Ordinances usually amend, repeal or supplement the municipal code; provide zoning specifications; or appropriate money for specific purposes.

Overriding Considerations: A ruling made by the lead agency in the CEQA process when the lead agency finds the importance of the project to the community outweighs potential adverse environmental impacts.

Public Comment: An opportunity for the general public to comment on regulations and other proposals made by government agencies. You can submit written or oral comments at the public meeting or send your written comments to the agency.

Public Hearing: A public hearing is an opportunity to testify on a proposed action by a governing board at a public meeting. The public and the media are welcome to attend the hearing and listen to, or participate in, the proceedings.

Public Notice: A public notice identifies the person, business, or local government seeking approval of a specific course of action (such as a regulation). It describes the activity for which approval is being sought, and describes the location where the proposed activity or public meeting will take place.

Public Nuisance: A public nuisance, for the purposes of air pollution regulations, is defined as a discharge from any source whatsoever of such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health, or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property. (Health and Safety Code section 41700).

Property Setback: In zoning parlance, a setback is the minimum amount of space required between a lot line and a building line.

Risk: For cancer health effects, risk is expressed as an estimate of the increased chances of getting cancer due to facility emissions over a 70-year lifetime. This increase in risk is expressed as chances in a million (e.g.,10 chances in a million).

Sensitive Individuals: Refers to those segments of the population most susceptible to poor air quality (i.e., children, the elderly, and those with pre-existing serious health problems affected by air quality).

Sensitive Sites or Sensitive Land Uses: Land uses where sensitive individuals are most likely to spend time, including schools and schoolyards, parks and playgrounds, day care centers, nursing homes, hospitals, and residential communities.

Setback: An area of land separating one parcel of land from another that acts to soften or mitigate the effects of one land use on the other.

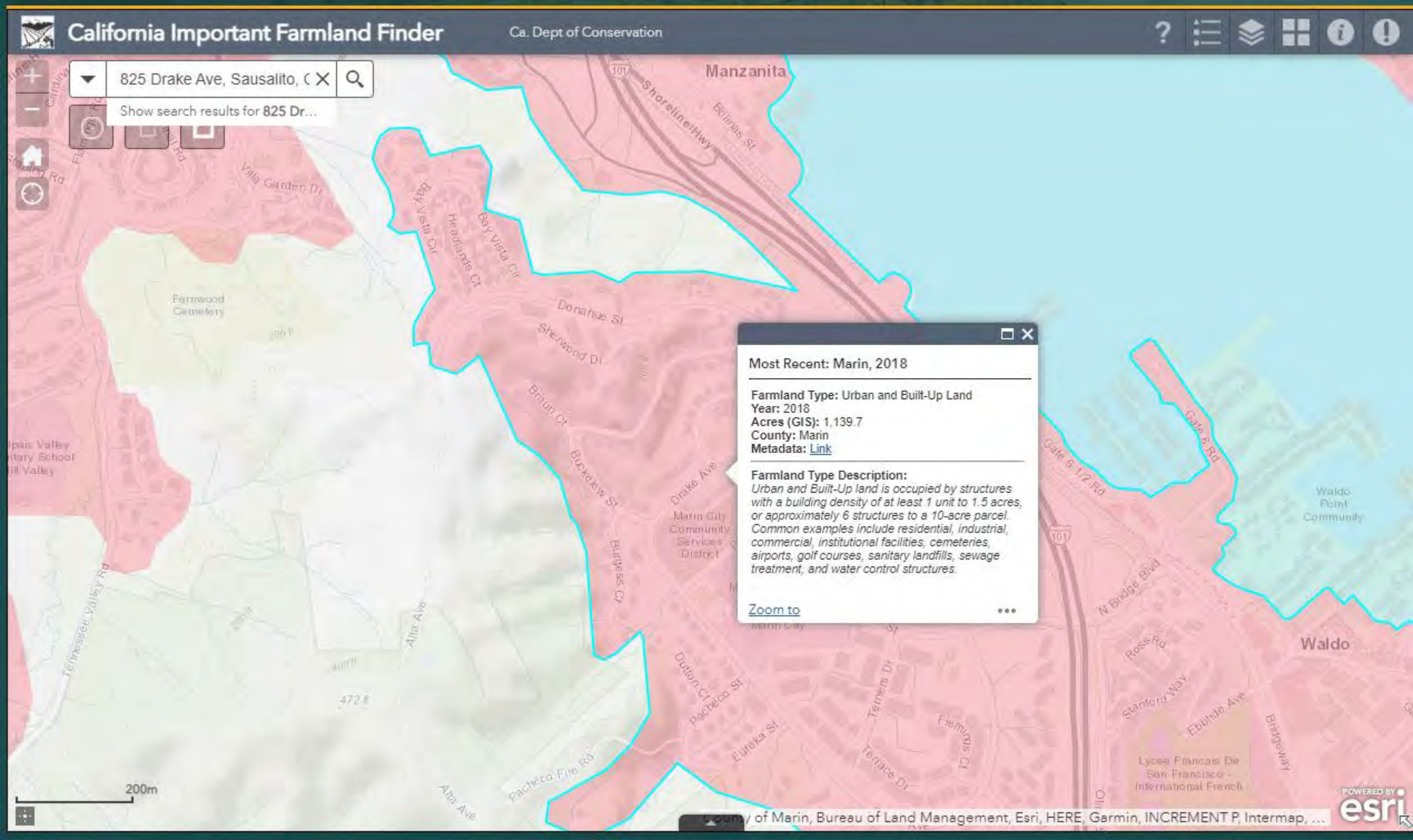
State Implementation Plan (SIP): A plan prepared by state and local agencies and submitted to U.S. EPA describing how each area will attain and maintain national ambient air quality standards. SIPs include the technical information about emission inventories, air quality monitoring, control measures and strategies, and enforcement mechanisms. A SIP is composed of local air quality management plans and state air quality regulations.

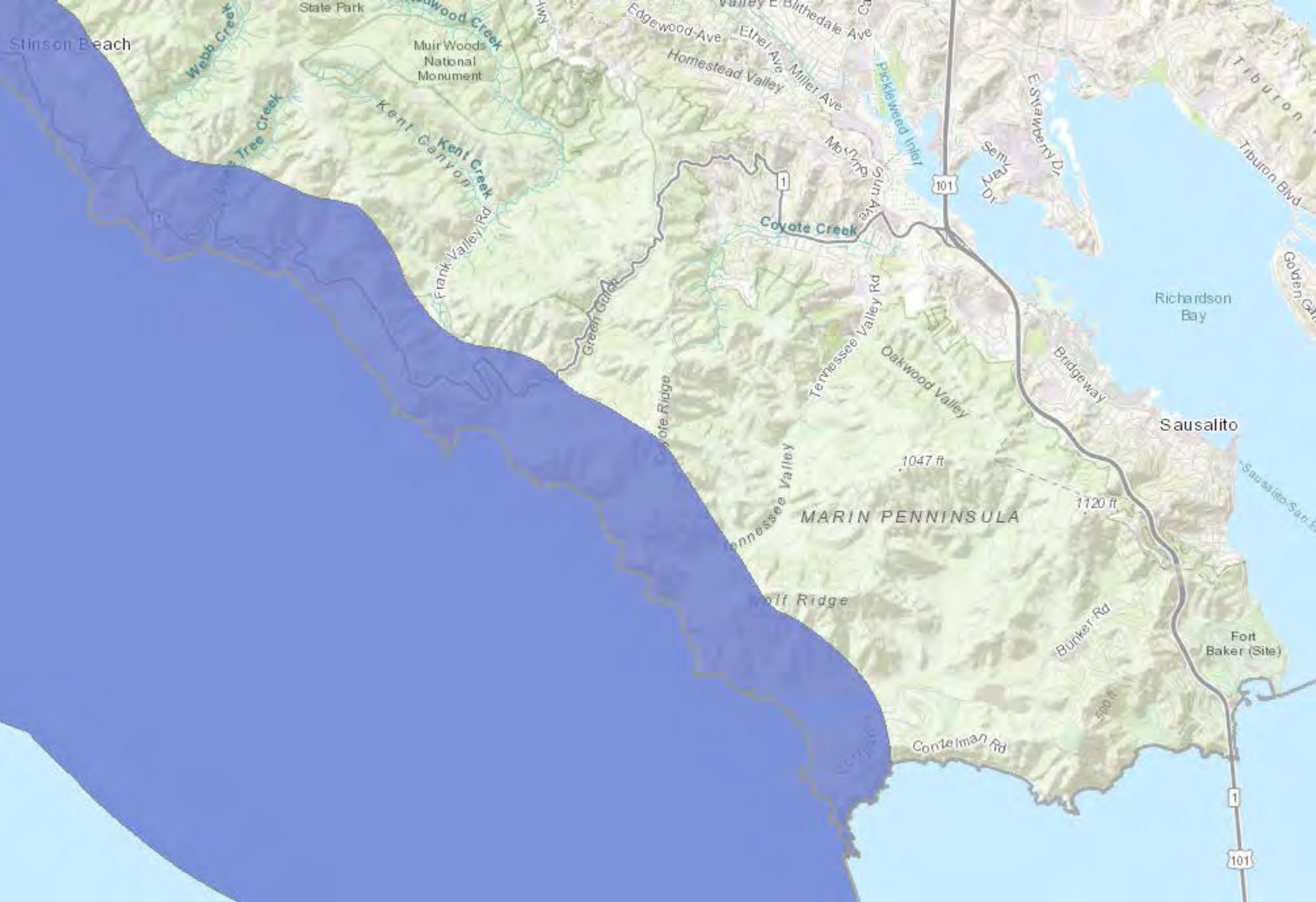
Stationary Sources: Non-mobile sources such as power plants, refineries, and manufacturing facilities.

Toxic Air Contaminant (TAC): An air pollutant, identified in regulation by the ARB, which may cause or contribute to an increase in deaths or in serious illness, or which may pose a present or potential hazard to human health. TACs are considered under a different regulatory process (California Health and Safety Code section 39650 et seq.) than pollutants subject to State Ambient Air Quality Standards. Health effects associated with TACs may occur at extremely low levels. It is often difficult to identify safe levels of exposure, which produce no adverse health effects.

Urban Background: The term is used in this Handbook to represent the ubiquitous, elevated, regional air pollution levels observed in large urban areas in California.

Zoning ordinances: City councils and county boards of supervisors adopts zoning ordinances that set forth land use classifications, divides the county or city into land use zones as delineated on the official zoning, maps, and set enforceable standards for future develop


California Important Farmland Finder
Ca. Dept of Conservation
825 Drake Ave, Sausalito, C
Show search results for 825 Dr...
Manzanita
Shoreline Hwy
Bay Vista Cir
Donahue St
Sherwood Dr
Braun Ct
Buckelew St
Burgess Ct
Drake Ave
Marin City Community Services District
Fernwood Cemetery
Villa Garden Dr
Tennessee Valley Rd
Alta Ave
Dutton Ct
Pacheco St
Eureka St
Pacheco Fire Rd
Gate 6 1/2 Rd
Gate 6 Rd
N Bridge Blvd
Ross Rd
Stanford Way
Ebbtide Ave
Bridgeway
Waldo Point Community
Waldo
Lycee Francais De San Francisco - International French
Most Recent: Marin, 2018
Farmland Type: Urban and Built-Up Land
Year: 2018
Acres (GIS): 1,139.7
County: Marin
Metadata: Link
Farmland Type Description:
Urban and Built-Up land is occupied by structures with a building density of at least 1 unit to 1.5 acres, or approximately 6 structures to a 10-acre parcel. Common examples include residential, industrial, commercial, institutional facilities, cemeteries, airports, golf courses, sanitary landfills, sewage treatment, and water control structures.
Zoom to
200m
County of Marin, Bureau of Land Management, Esri, HERE, Garmin, INCREMENT P, Intermap, ...
POWERED BY esri


Stinson Beach
State Park
Muir Woods National Monument
Webb Creek
Redwood Creek
Tree Creek
Kent Canyon
Kent Creek
Frank Valley Rd
Green Gulch
Coyote Ridge
Edgewood Ave
Ethel Ave
Miller Ave
Homestead Valley
Valley E Blithedale Ave
Pickleweed Inlet
Morning Sun Ave
Coyote Creek
1
101
E Strawberry Dr
Seny Neu Dr
Tiburon Blvd
Richardson Bay
Tennessee Valley Rd
Oakwood Valley
Bridgeway
Sausalito
1047 ft
1120 ft
MARIN PENNINSULA
Tennessee Valley
Wolf Ridge
Bunker Rd
Fort Baker (Site)
500 ft
Conzelman Rd
Sausalito-San F

SWIS Facility/Site Activity Details

Redwood Landfill (21-AA-0001)

Activity
Solid Waste Landfill

Classification
Solid Waste Facility

Category
Disposal

Operational Status
Active

Regulatory Status
Permitted

Ceased Operation Date
7/1/2024

Closure Type
Estimate

Inspection Frequency
Monthly

Max. Permitted Throughput
2,300

Volume Unit Type
Tons per day

Remaining Capacity

26,000,000

Remaining Capacity Date

12/18/2008

Max. Permit Capacity

19,100,000

Capacity Unit Type

Cubic Yards

Total Acreage

420.00

Disposal Acreage

222.50

Permitted Elevation

166

Elevation Type

MSL

Permitted Depth

--

Depth Type

--

WDR Landfill Class

III

Waste Types

Other designated
Wood waste

Ash
Tires
Asbestos
Construction/demolition
Agricultural
Sludge (BioSolids)
Mixed municipal

CalRecycle Contact: Kelsey Orr (916) 341-6801

Back

©1995, 2019 California Department of Resources Recycling and Recovery (CalRecycle)

04	101	MRN	L	0.000	MARIN/SF COUNTY LINE, ON GOLDEN GATE BRIDGE				10100	125000	117600
04	101	MRN		0.318	SAUSALITO ROAD	10100	125000	117600	9700	119000	112400
04	101	MRN		1.677	SAUSALITO, SPENCER AVENUE/ MONTE MAR	9700	119000	112400	9800	122000	114500
04	101	MRN		2.480	SAUSALITO, RODEO AVENUE	9800	122000	114500	9700	120000	113400
04	101	MRN		3.334	WALDO UC	9700	120000	113400	12000	148000	139700
04	101	MRN		4.134	JCT. RTE. 1 WEST	12000	148000	139700	11800	146000	137600
04	101	MRN		4.754	STRAWBERRY POINT/FRONTAGE ROAD	11800	146000	137600	11700	145000	136500
04	101	MRN		5.694	JCT. RTE. 131 EAST	11700	145000	136500	14600	180000	169100
04	101	MRN		7.365	CORTE MADERA, TAMALPAIS DRIVE	14400	179000	168000	14700	183000	172200

825 Drake Ave, Sausalitc

3 sites found

Aboveground Petroleum Storage

Did you mean: 825 Drake Ave, Sausalito, CA 94965

Caltrans-Manzanita
40 SHORELINE HWY
MILL VALLEY CA 94941

County of Marin/Marin City Fire
850 DRAKE AVENUE
MARIN CITY CA 94965

Clipper Yacht Company
310 HARBOR DRIVE
SAUSALITO CA 94965

County of Marin/Marin City Fire
850 DRAKE AVENUE
MARIN CITY CA 94965

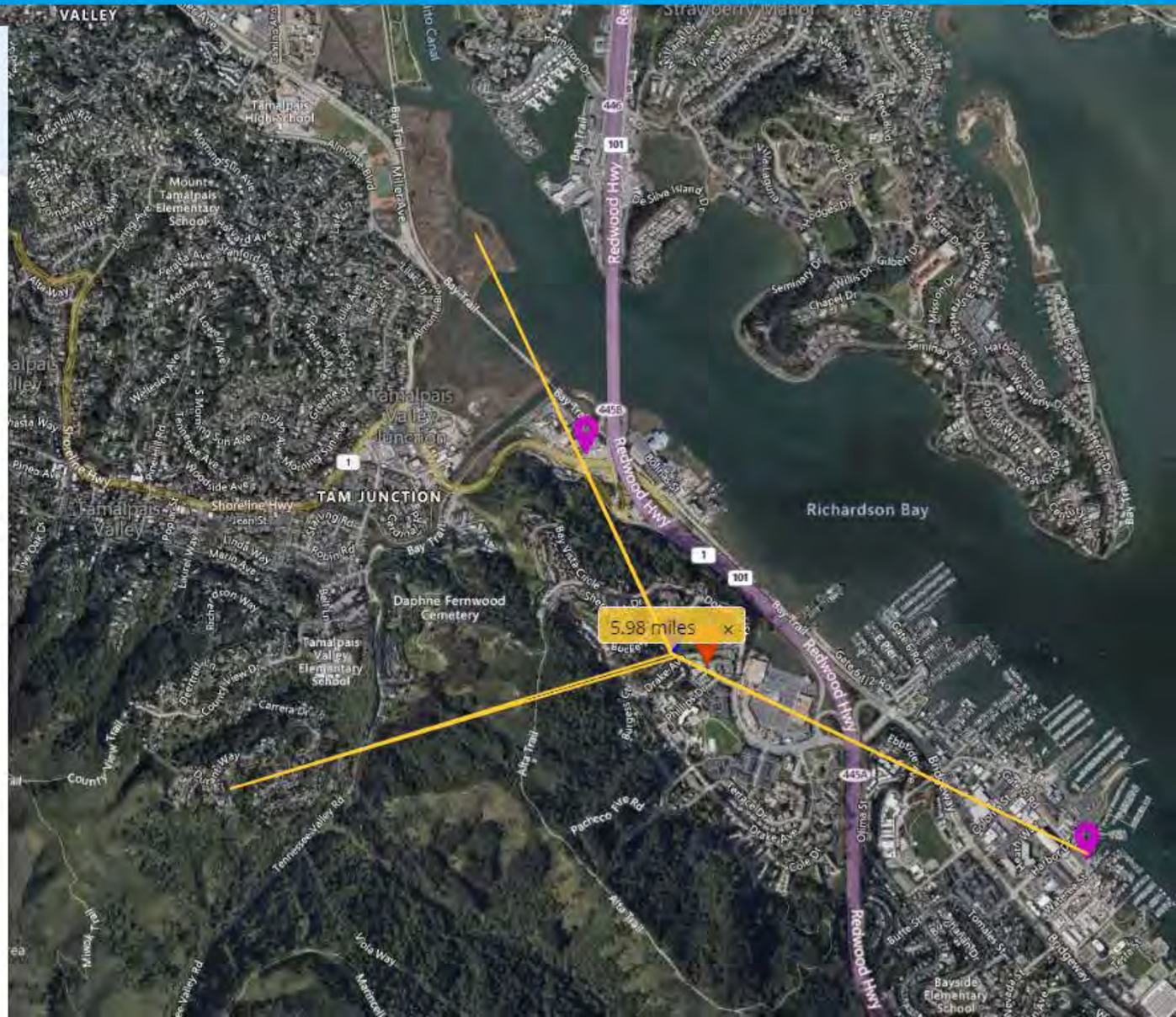
SHOW MORE INFORMATION >

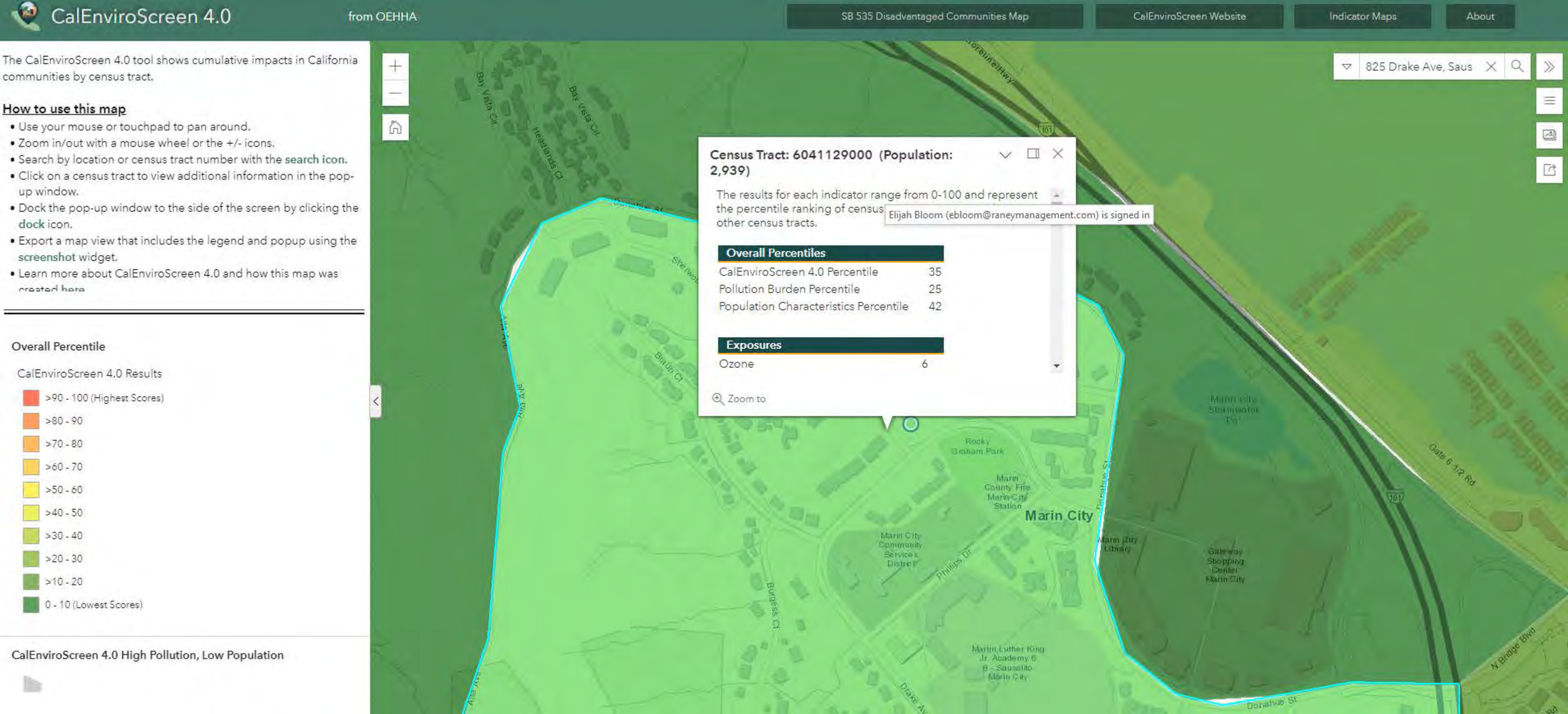
Regulatory Programs

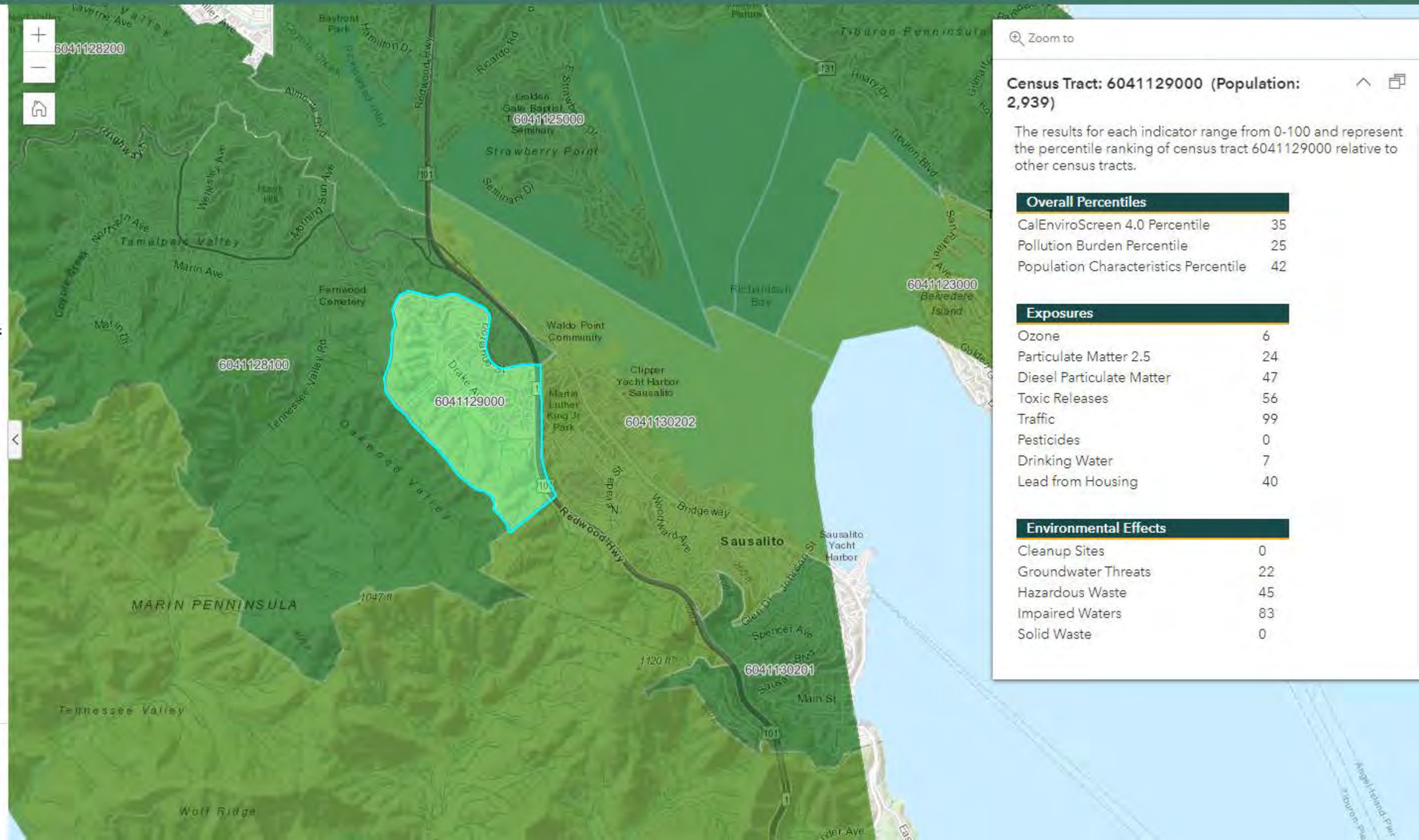
Aboveground Petroleum Storage
Chemical Storage Facilities

Evaluations

Total	5




CalEnviroScreen 4.0
from OEHHA
SB 535 Disadvantaged Communities Map
CalEnviroScreen Website
Indicator Maps
About
The CalEnviroScreen 4.0 tool shows cumulative impacts in California communities by census tract.
How to use this map
• Use your mouse or touchpad to pan around.
• Zoom in/out with a mouse wheel or the +/- icons.
• Search by location or census tract number with the search icon.
• Click on a census tract to view additional information in the pop-up window.
• Dock the pop-up window to the side of the screen by clicking the dock icon.
• Export a map view that includes the legend and popup using the screenshot widget.
• Learn more about CalEnviroScreen 4.0 and how this map was created here
Overall Percentile
CalEnviroScreen 4.0 Results
>90 - 100 (Highest Scores)
>80 - 90
>70 - 80
>60 - 70
>50 - 60
>40 - 50
>30 - 40
>20 - 30
>10 - 20
0 - 10 (Lowest Scores)
CalEnviroScreen 4.0 High Pollution, Low Population
825 Drake Ave, Saus
Census Tract: 6041129000 (Population: 2,939)
The results for each indicator range from 0-100 and represent the percentile ranking of census
Elijah Bloom (ebloom@raneymanagement.com) is signed in
other census tracts.
Overall Percentiles
CalEnviroScreen 4.0 Percentile 35
Pollution Burden Percentile 25
Population Characteristics Percentile 42
Exposures
Ozone 6
Zoom to
Marin City
Rocky Graham Park
Marin City Community Services District
Marin County Fire Marin City Station
Marin City Library
Gateway Shopping Center Marin City
Marin Luther King Jr. Academy 6 - Sausalito Marin City
Marin City Stormwater Pol
Gate 6 1/2 Rd
Donahue St
N Bridge Blvd
Bay Vista Cir
Highlands Ct
Phillips Dr
Burgess Ct
Drake Ave



How to use this map

- Use your mouse or touchpad to pan around.
- Zoom in/out with a mouse wheel or the +/- icons.
- Search by location or census tract number with the **search icon**.
- Click on a census tract to view additional information in the pop-up window.
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- Export a map view that includes the legend and popup using the **screenshot** widget.
- Learn more about CalEnviroScreen 4.0 and how this map was created **here**.
- Click the links in the header to view additional maps related to CalEnviroScreen 4.0.

Overall Percentile

CalEnviroScreen 4.0 Results

- >90 - 100 (Highest Scores)
- >80 - 90
- >70 - 80
- >60 - 70
- >50 - 60
- >40 - 50
- >30 - 40
- >20 - 30
- >10 - 20
- 0 - 10 (Lowest Scores)

CalEnviroScreen 4.0 High Pollution, Low Population

Zoom to

Census Tract: 6041129000 (Population: 2,939)

The results for each indicator range from 0-100 and represent the percentile ranking of census tract 6041129000 relative to other census tracts.

Overall Percentiles	
CalEnviroScreen 4.0 Percentile	35
Pollution Burden Percentile	25
Population Characteristics Percentile	42

Exposures	
Ozone	6
Particulate Matter 2.5	24
Diesel Particulate Matter	47
Toxic Releases	56
Traffic	99
Pesticides	0
Drinking Water	7
Lead from Housing	40

Environmental Effects	
Cleanup Sites	0
Groundwater Threats	22
Hazardous Waste	45
Impaired Waters	83
Solid Waste	0

CALGreen Construction Waste Management Requirements

Waste Diversion

CALGreen requires covered projects to recycle and/or salvage for reuse a minimum 65% of the nonhazardous construction and demolition waste or meet a local construction and demolition waste management ordinance, whichever is more stringent.

The code applies to various occupancies and types. Please see this table for general requirements for each type. For specifics on the code's scope, see Section 101.3. Also see Section 101.11 for a list of steps that can be used to determine which sections apply to each type of occupancy.

Methods of Compliance

- Enforcing agencies can require contractors to develop and maintain a waste management plan and document diversion and disposal. OR
- Utilize a waste management company that can provide verifiable documentation that it meets 65% waste diversion. OR
- Use a waste stream reduction alternative:
  - Non-residential new construction and residential high rise (4 stories or more) projects with a total disposal weight of ≤ 2 lbs/ft2 meets the 65% waste diversion requirement.
  - Residential low rise (3 stories or less) with new construction disposal of ≤ 3.4 lbs/ft2 meets the 65% waste diversion requirement.

Recycling by Occupants (Space for Recycling)

Newly constructed non-residential buildings, certain non-residential additions and multi-family housing with ≥ 5 units should provide readily accessible areas that serve the entire building and are identified for the depositing, storage and collection of non-hazardous materials for recycling, including (at minimum) paper, corrugated cardboard, glass, plastics, organic waste and metals.

For more information on CALGreen's waste diversion requirements, refer to the FAQ page.

Know Your Waste Stream

For more information contact: Local Assistance & Market Development, LAMD@calrecycle.ca.gov

PIN
- Approximate location based on user input and does not represent an authoritative property location

MAP PANELS
- Selected FloodMap Boundary
- Digital Data Available
- No Digital Data Available
- Unmapped

OTHER AREAS
- NO SCREEN — Area of Minimal Flood Hazard *Zone X*
- Effective LOMRs
- Area of Undetermined Flood Hazard *Zone D*
- Otherwise Protected Area
- Coastal Barrier Resource System Area

SPECIAL FLOOD HAZARD AREAS
- Without Base Flood Elevation (BFE) *Zone A, V, A99*
- With BFE or Depth
- Regulatory Floodway *Zone AE, AO, AH, VE, AR*

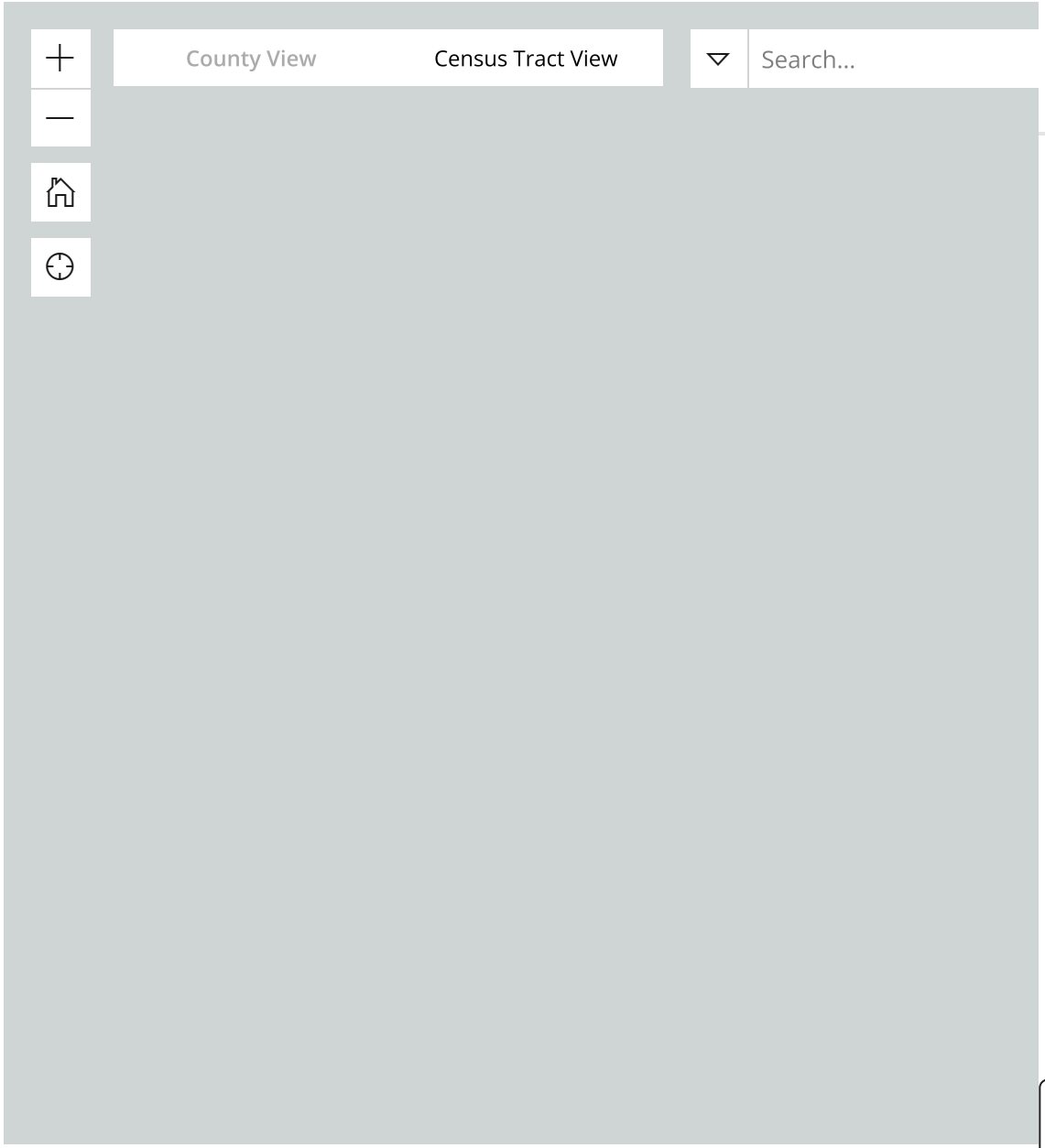
OTHER AREAS OF FLOOD HAZARD
- 0.2% Annual Chance Flood Hazard, Areas of 1% annual chance flood with average depth less than one foot or with drainage areas of less than one square mile *Zone X*
- Future Conditions 1% Annual Chance Flood Hazard *Zone X*
- Area with Reduced Flood Risk due to Levee. See Notes. *Zone X*
- Area with Flood Risk due to Levee *Zone D*

OTHER FEATURES
- 20.2 / 17.5 — Cross Sections with 1% Annual Chance Water Surface Elevation
- Coastal Transect
- Base Flood Elevation Line (BFE)
- Limit of Study
- Jurisdiction Boundary
- Coastal Transect Baseline
- Profile Baseline
- Hydrographic Feature

GENERAL STRUCTURES
- Channel, Culvert, or Storm Sewer
- Levee, Dike, or Floodwall

Risk Index | Expected Annual Loss | Help

County View | Census Tract View | Search...



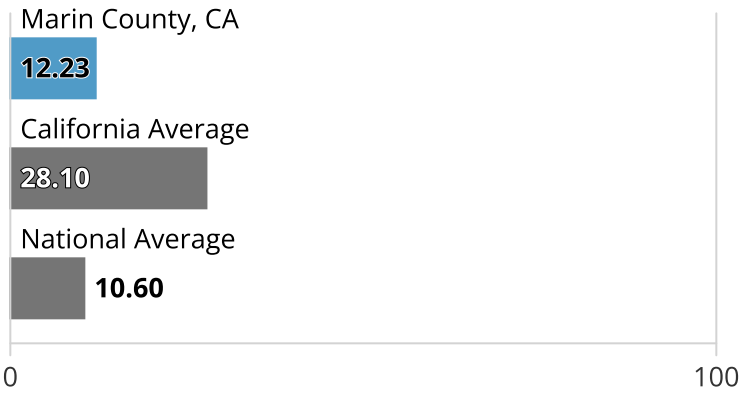
Marin County

California

Risk Index

Risk Index is Relatively Low

Score **12.23**



The Risk Index rating is **Relatively Low** for **Marin County, CA** when compared to the rest of the U.S.

73.8% of U.S. counties have a lower Risk Index

10.3% of counties in California have a lower

Create Report

TECHNICAL ADVISORY

ON EVALUATING TRANSPORTATION IMPACTS IN CEQA

April 2018

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A. Introduction

This technical advisory is one in a series of advisories provided by the Governor's Office of Planning and Research (OPR) as a service to professional planners, land use officials, and CEQA practitioners. OPR issues technical assistance on issues that broadly affect the practice of land use planning and the California Environmental Quality Act (CEQA) (Pub. Resources Code, § 21000 et seq.). (Gov. Code, § 65040, subds. (g), (l), (m).) The purpose of this document is to provide advice and recommendations, which agencies and other entities may use at their discretion. This document does not alter lead agency discretion in preparing environmental documents subject to CEQA. This document should not be construed as legal advice.

Senate Bill 743 (Steinberg, 2013), which was codified in Public Resources Code section 21099, required changes to the guidelines implementing CEQA (CEQA Guidelines) (Cal. Code Regs., Title 14, Div. 6, Ch. 3, § 15000 et seq.) regarding the analysis of transportation impacts. As one appellate court recently explained: "During the last 10 years, the Legislature has charted a course of long-term sustainability based on denser infill development, reduced reliance on individual vehicles and improved mass transit, all with the goal of reducing greenhouse gas emissions. Section 21099 is part of that strategy . . . ." (*Covina Residents for Responsible Development v. City of Covina* (Feb. 28, 2018, B279590) __Cal.App.5th__, ordered pub. Mar. 22, 2018.) Pursuant to Section 21099, the criteria for determining the significance of transportation impacts must "promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses." (*Id.*, subd. (b)(1).) To that end, OPR has proposed changes to the CEQA Guidelines that identify vehicle miles traveled (VMT) as the most appropriate metric to evaluate a project's transportation impacts. Once the California Natural Resources Agency adopts these changes to the CEQA Guidelines, automobile delay, as measured by "level of service" and other similar metrics, generally will no longer constitute a significant environmental effect under CEQA.

This advisory contains technical recommendations regarding assessment of VMT, thresholds of significance, and mitigation measures. Again, OPR provides this Technical Advisory as a resource for the public to use at their discretion. OPR is not enforcing or attempting to enforce any part of the recommendations contained herein. (Gov. Code, § 65035 ["It is not the intent of the Legislature to vest in the Office of Planning and Research any direct operating or regulatory powers over land use, public works, or other state, regional, or local projects or programs."].)

This April 2018 technical advisory is an update to the advisory it published in November 2017. OPR will continue to monitor implementation of these new provisions and may update or supplement this advisory in response to new information and advancements in modeling and methods.

B. Background

VMT and Greenhouse Gas Emissions Reduction. Senate Bill 32 (Pavley, 2016) requires California to reduce greenhouse gas emissions 40 percent below 1990 levels by 2030, and Executive Order B-16-12

provides a target of 80 percent below 1990 emissions levels for the transportation sector by 2050. The transportation sector has three major means of reducing greenhouse gas emissions: increasing vehicle efficiency, reducing fuel carbon content, and reducing the amount of vehicle travel. The California Air Resources Board (CARB) has provided a path forward for achieving these emissions reductions from the transportation sector in its 2016 Mobile Source Strategy. CARB determined that it will not be possible to achieve the State's 2030 and post-2030 emissions goals without reducing VMT growth.

VMT and Other Impacts to Health and Environment. Beyond greenhouse gas emissions, increases in VMT also impact human health and the natural environment. Human health is impacted as increases in vehicle travel leads to more vehicle crashes, poorer air quality, increases in chronic diseases associated with reduced physical activity, and worse mental health. Increases in vehicle travel also negatively affects other road users, including pedestrians, cyclists, other motorists, and many transit users. The natural environment is impacted as higher VMT leads to more collisions with wildlife and fragments habitat. Additionally, development which leads to more vehicle travel also tends to consume more energy, water, and open space (including farmland and sensitive habitat). This increase in impermeable surfaces raises the flood risk and pollutant transport into waterways. (Fang et al., 2017.)

VMT and Economic Growth. While it was previously believed that VMT growth was a necessary component of economic growth, data from the past two decades shows that economic growth is possible without a concomitant increase in VMT. (Figure 1.) Recent research shows that requiring development projects to mitigate LOS may actually reduce accessibility to destinations and impede economic growth.[1,2]

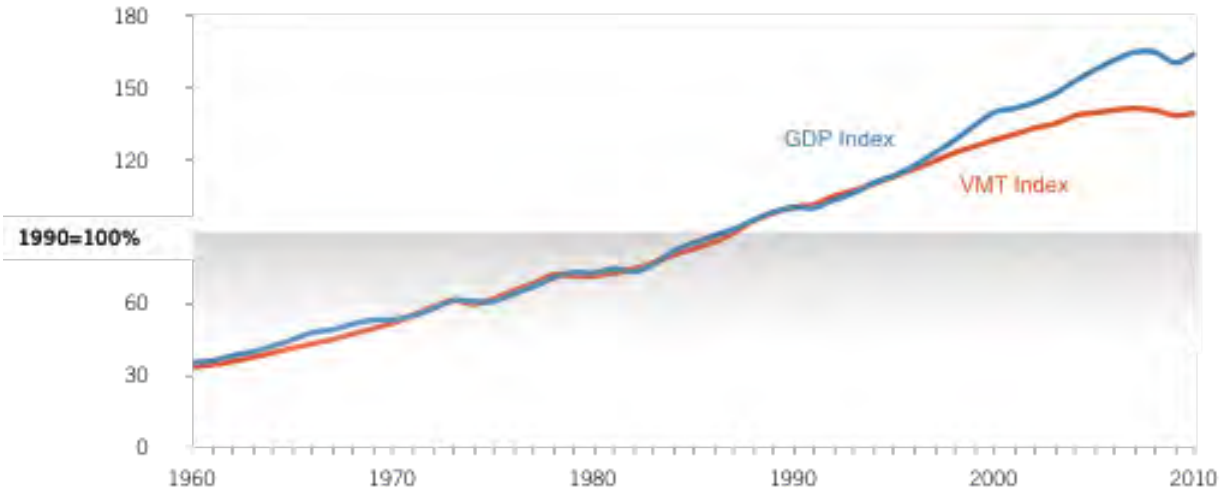

Figure 1. VMT and Gross Domestic Product (GDP), 1960-2010 (Kooshian and Winkelman, 2011)

[1] Haynes et al., *Congested Development: A Study of Traffic Delays, Access, and Economic Activity in Metropolitan Los Angeles*, Sept. 2015.

[2] Osman et al., *Not So Fast: A Study of Traffic Delays, Access, and Economic Activity in the San Francisco Bay Area*, March 2016.

C. Technical Considerations in Assessing Vehicle Miles Traveled

Many practitioners are familiar with accounting for VMT in connection with long-range planning, or as part of the CEQA analysis of a project's greenhouse gas emissions or energy impacts. This document provides technical information on how to assess VMT as part of a transportation impacts analysis under CEQA. Appendix 1 provides a description of which VMT to count and options on how to count it. Appendix 2 provides information on induced travel resulting from roadway capacity projects, including the mechanisms giving rise to induced travel, the research quantifying it, and information on additional approaches for assessing it.

1. Recommendations Regarding Methodology

Proposed Section 15064.3 explains that a "lead agency may use models to estimate a project's vehicle miles traveled . . . ." CEQA generally defers to lead agencies on the choice of methodology to analyze impacts. (*Santa Monica Baykeeper v. City of Malibu* (2011) 193 Cal.App.4th 1538, 1546; see *Laurel Heights Improvement Assn. v. Regents of University of California* (1988) 47 Cal.3d 376, 409 ["the issue is not whether the studies are irrefutable or whether they could have been better" … rather, the "relevant issue is only whether the studies are sufficiently credible to be considered" as part of the lead agency's overall evaluation].) This section provides suggestions to lead agencies regarding methodologies to analyze VMT associated with a project.

Vehicle Types. Proposed Section 15064.3, subdivision (a), states, "For the purposes of this section, 'vehicle miles traveled' refers to the amount and distance of automobile travel attributable to a project." Here, the term "automobile" refers to on-road passenger vehicles, specifically cars and light trucks. Heavy-duty truck VMT could be included for modeling convenience and ease of calculation (for example, where models or data provide combined auto and heavy truck VMT). For an apples-to-apples comparison, vehicle types considered should be consistent across project assessment, significance thresholds, and mitigation.

Residential and Office Projects. Tour- and trip-based approaches[3] offer the best methods for assessing VMT from residential/office projects and for comparing those assessments to VMT thresholds. These approaches also offer the most straightforward methods for assessing VMT reductions from mitigation measures for residential/office projects. When available, tour-based assessment is ideal because it captures travel behavior more comprehensively. But where tour-based tools or data are not available for all components of an analysis, a trip-based assessment of VMT serves as a reasonable proxy.

Models and methodologies used to calculate thresholds, estimate project VMT, and estimate VMT reduction due to mitigation should be comparable. For example:

[3] See Appendix 1, *Considerations About Which VMT to Count,* for a description of these approaches.

- A tour-based assessment of project VMT should be compared to a tour-based threshold, or a trip-based assessment to a trip-based VMT threshold.
- Where a travel demand model is used to determine thresholds, the same model should also be used to provide trip lengths as part of assessing project VMT.
- Where only trip-based estimates of VMT reduction from mitigation are available, a trip-based threshold should be used, and project VMT should be assessed in a trip-based manner.

When a trip-based method is used to analyze a residential project, the focus can be on home-based trips. Similarly, when a trip-based method is used to analyze an office project, the focus can be on home-based work trips.

When tour-based models are used to analyze an office project, either employee work tour VMT or VMT from all employee tours may be attributed to the project. This is because workplace location influences overall travel. For consistency, the significance threshold should be based on the same metric: either employee work tour VMT or VMT from all employee tours.

For office projects that feature a customer component, such as a government office that serves the public, a lead agency can analyze the customer VMT component of the project using the methodology for retail development (see below).

Retail Projects. Generally, lead agencies should analyze the effects of a retail project by assessing the change in total VMT[4] because retail projects typically re-route travel from other retail destinations. A retail project might lead to increases or decreases in VMT, depending on previously existing retail travel patterns.

Considerations for All Projects. Lead agencies should not truncate any VMT analysis because of jurisdictional or other boundaries. CEQA requires environmental analyses to reflect a "good faith effort at full disclosure." (CEQA Guidelines, § 15151.) Thus, where methodologies exist that can estimate the full extent of vehicle travel from a project, the lead agency should apply them to do so. Analyses should also consider a project's both short- and long-term effects on VMT.

Any project that includes in its geographic bounds a portion of an existing or planned Transit Priority Area (i.e., the project is within a ½ mile of an existing or planned major transit stop or an existing stop along a high quality transit corridor) may employ VMT as its primary metric of transportation impact for the entire project. (See Pub. Resources Code, § 21099, subds. (a)(7), (b)(1).)

[4] See Appendix 1, *Considerations About Which VMT to Count, "*Assessing Change in Total VMT" section, for a description of this approach.

D. General Principles to Guide Consideration of VMT

SB 743 directs OPR to establish specific "criteria for determining the significance of transportation impacts of projects[.]" (Pub. Resources Code, § 21099, subd. (b)(1).) In establishing this criterion, OPR was guided by the general principles contained within CEQA, the CEQA Guidelines, and applicable case law.

To assist in the determination of significance, many lead agencies rely on "thresholds of significance." The CEQA Guidelines define a "threshold of significance" to mean "an identifiable **quantitative, qualitative[5] or performance level** of a particular environmental effect, non-compliance with which means the effect will ***normally*** be determined to be significant by the agency and compliance with which means the effect ***normally*** will be determined to be less than significant." (CEQA Guidelines, § 15064.7, subd. (a) (emphasis added).) Lead agencies have discretion to develop and adopt their own, or rely on thresholds recommended by other agencies, "provided the decision of the lead agency to adopt such thresholds is supported by substantial evidence." (*Id*. at subd. (c); *Save Cuyama Valley v. County of Santa Barbara* (2013) 213 Cal.App.4th 1059, 1068.) Substantial evidence means "enough relevant information and reasonable inferences from this information that a fair argument can be made to support a conclusion, even though other conclusions might also be reached." (*Id*. at § 15384 (emphasis added); *Protect the Historic Amador Waterways v. Amador Water Agency* (2004) 116 Cal.App.4th 1099, 1108-1109.)

Additionally, the analysis leading to the determination of significance need not be perfect. The CEQA Guidelines describe the standard for adequacy of environmental analyses:

> An EIR should be prepared with a sufficient degree of analysis to provide decision makers with information which enables them to **make a decision which intelligently takes account of environmental consequences**. An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is **reasonably feasible**. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts. The **courts have looked not for perfection** but for **adequacy**, **completeness**, and a **good faith effort** at full disclosure.

(CEQA Guidelines, § 15151 (emphasis added).)

These general principles guide OPR's recommendations regarding thresholds of significance for VMT set forth below.

[5] Because the amount of a project's VMT is needed (and is currently being used in practice) to assess the environmental impacts on a variety of resources (such as air quality, greenhouse gases, energy, and noise), qualitative analysis should only be applied when models or methods do not exist for undertaking a quantitative analysis.

E. Recommendations Regarding Significance Thresholds

As noted above, lead agencies have the discretion to set or apply their own thresholds of significance. (*Center for Biological Diversity v. California Dept. of Fish & Wildlife* (2015) 62 Cal.4th 204, 218-223 [lead agency had discretion to use compliance with AB 32's emissions goals as a significance threshold]; ***Save Cuyama Valley v. County of Santa Barbara*** (2013) 213 Cal.App.4th at p. 1068.) However, Section 21099 of the Public Resources Code states that the criteria for determining the significance of transportation impacts must promote: (1) reduction of greenhouse gas emissions; (2) development of multimodal transportation networks; and (3) a diversity of land uses. It further directed OPR to prepare and develop criteria for determining significance. (Pub. Resources Code, § 21099, subd. (b)(1).) This section provides OPR's suggested thresholds, as well as considerations for lead agencies that choose to adopt their own thresholds.

Various legislative mandates and state policies establish quantitative greenhouse gas emissions reduction targets. For example:

- Assembly Bill 32 (2006) requires statewide greenhouse gas reductions to 1990 levels by 2020 and continued reductions beyond 2020.

- Senate Bill 32 (2016) requires at least a 40 percent reduction in greenhouse gas emissions by 2030.

- Pursuant to Senate Bill 375 (2008), the California Air Resources Board establishes greenhouse gas reduction targets for metropolitan planning organizations (MPOs) to achieve based on land use patterns and transportation systems specified in Regional Transportation Plans and Sustainable Community Strategies. Current targets for the largest metropolitan planning organizations range from 13% to 16% reductions by 2035.

- Executive Order B-30-15 (2015) sets a GHG emissions reduction target of 40 percent below 1990 levels by 2030.

- Executive Order S-3-05 (2005) sets a GHG emissions reduction target of 80 percent below 1990 levels by 2050.

- Executive Order B-16-12 (2012) specifies a GHG emissions reduction target of 80 percent below 1990 levels by 2050 specifically for transportation.

- Senate Bill 391 requires the California Transportation Plan to support 80 percent reduction in GHGs below 1990 levels by 2050.

- The *California Air Resources Board Mobile Source Strategy* (2016) describes California's strategy for containing air pollutant emissions from vehicles, and quantifies VMT growth compatible with achieving state targets.
- The California Air Resources Board's *2017 Climate Change Scoping Plan Update: The Strategy for Achieving California's 2030 Greenhouse Gas Target* describes California's strategy for containing

> greenhouse gas emissions from vehicles, and quantifies VMT growth compatible with achieving state targets.

Considering these various targets, the California Supreme Court observed:

> Meeting our statewide reduction goals does not preclude all new development. Rather, the Scoping Plan … assumes continued growth and depends on increased efficiency and conservation in land use and transportation from all Californians.

(*Center for Biological Diversity v. California Dept. of Fish & Wildlife*, *supra*, 62 Cal.4th at p. 220.) Indeed, the Court noted that when a lead agency uses consistency with climate goals as a way to determine significance, particularly for long-term projects, the lead agency must consider the project's effect on meeting long-term reduction goals. (*Ibid*.) And more recently, the Supreme Court stated that "CEQA requires public agencies . . . to ensure that such analysis stay in step with evolving scientific knowledge and state regulatory schemes." (*Cleveland National Forest Foundation v. San Diego Assn. of Governments* (2017) 3 Cal.5th 497, 504.)

Meeting the targets described above will require substantial reductions in existing VMT per capita to curb greenhouse gases and other pollutants. But those targets do not translate directly into VMT thresholds for individual projects for many reasons, including:

- Some, but not all, of the emissions reductions needed to achieve those targets could be accomplished by other measures, including increased vehicle efficiency and decreased fuel carbon content. The CARB's *First Update to the Climate Change Scoping Plan* explains: "Achieving California's long-term criteria pollutant and GHG emissions goals will require four strategies to be employed: (1) improve vehicle efficiency and develop zero emission technologies, (2) reduce the carbon content of fuels and provide market support to get these lower-carbon fuels into the marketplace, (3) **plan and build communities to reduce vehicular GHG emissions and provide more transportation options, and (4) improve the efficiency and throughput of existing transportation systems.**" (CARB, *First Update to the Climate Change Scoping Plan*, May 2014, p. 46 (emphasis added).) In other words, vehicle efficiency and better fuels are necessary, but insufficient, to address the greenhouse gas emissions from the transportation system. Land use patterns and transportation options also will need to change to support reductions in vehicle travel/VMT.

- New land use projects alone will not sufficiently reduce per-capita VMT to achieve those targets, nor are they expected to be the sole source of VMT reduction.

- Interactions between land use projects, and also between land use and transportation projects, existing and future, together affect VMT.

- Because location within the region is the most important determinant of VMT, in some cases, streamlining CEQA review of projects in travel efficient locations may be the most effective means of reducing VMT.

- When assessing climate impacts of land use projects, use of an efficiency metric (e.g., per capita, per employee) may provide a better measure of impact than an absolute numeric threshold. (*Center for Biological Diversity*, *supra*.)

Public Resources Code section 21099 directs OPR to propose criteria for determining the significance of transportation impacts. In this Technical Advisory, OPR provides its recommendations to assist lead agencies in selecting a significance threshold that may be appropriate for their particular projects. While OPR's Technical Advisory is not binding on public agencies, CEQA allows lead agencies to "consider thresholds of significance . . . recommended by other public agencies, provided the decision to adopt those thresholds is supported by substantial evidence." (CEQA Guidelines, § 15064.7, subd. (c).) Based on OPR's extensive review of the applicable research and literature on this topic, **OPR finds that in most instances a per capita or per employee VMT that is fifteen percent below that of existing development may be a reasonable threshold**.

First, as described above, Section 21099 states that the criteria for determining significance must "promote the reduction in greenhouse gas emissions." SB 743 also states the Legislature's intent that the analysis of transportation in CEQA better promotes the State's goals of reducing greenhouse gas emissions. It cites in particular the reduction goals in the Global Warming Solutions Act (AB 32) and the Sustainable Communities and Climate Protection Act (SB 375), both of which call for substantial reductions. As indicated above, CARB established long-term reduction targets for the largest regions in the state that ranged from 13 to 16 percent.

Second, Caltrans has developed a statewide VMT reduction target in its Strategic Management Plan. Specifically, it calls for a 15 percent reduction in per capita VMT, compared to 2010 levels, by 2020.

Third, fifteen percent reductions in VMT are achievable at the project level in a variety of place types. (Quantifying Greenhouse Gas Measures, p. 55 CAPCOA, 2010).

Fourth, in CARB's most recent update to the Climate Change Scoping Plan, a 15 percent reduction in light-duty VMT beyond what existing plan and policies achieve is recommended to achieve the State's 2030 and 2050 targets. (CARB, *The 2017 Climate Change Scoping Plan: The Strategy for Achieving California's 2030 Greenhouse Gas Target*, October 2017, pp. 116, 150; see generally, CARB, *Climate Change Scoping Plan: A Framework for Change*, December 2008, p. 27; CARB, *First Update to the Climate Change Scoping Plan*, May 2014, p. 113; CARB, *The 2017 Climate Change Scoping Plan: The Strategy for Achieving California's 2030 Greenhouse Gas Target*, October 2017, p. 149.)

The Final 2017 Scoping Plan Update states,

> VMT reductions are necessary to achieve the 2030 target and must be part of any strategy evaluated in this Plan. Stronger SB 375 GHG reduction targets will enable the State to make significant progress toward this goal, but alone will not provide all of the VMT growth reductions that will be needed. There is a gap between what SB 375 can provide and what is needed to meet the State's 2030 and 2050 goals." (CARB, California's 2017 Climate Change Scoping Plan, November 2017, p. 75.)

Furthermore,

> At the State level, a number of important policies are being developed. Governor Brown signed Senate Bill 743 (Steinberg, 2013), which called for an update to the metric of transportation impact in CEQA. That update to the CEQA Guidelines is currently underway. Employing VMT as the metric of transportation impact statewide will help to ensure GHG reductions planned under SB 375 will be achieved through on-the-ground development, and will also play an important role in creating the additional GHG reductions needed beyond SB 375 across the State. (*Id.* at p. 76.)
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> . . . .
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> Employing VMT as the metric of transportation impact statewide will help to ensure GHG reductions planned under SB 375 will be achieved through on-the-ground development, and will also play an important role in creating the additional GHG reductions needed beyond SB 375 across the State. Implementation of this change will rely, in part, on local land use decisions to reduce GHG emissions associated with the transportation sector, both at the project level, and in long-term plans (including general plans, climate action plans, specific plans, and transportation plans) and supporting sustainable community strategies developed under SB 375. The State can provide guidance and tools to assist local governments in achieving those objectives. (*Id.* at p. 76.)
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> . . . .
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> California's future climate strategy will require increased focus on integrated land use planning to support livable, transit-connected communities, and conservation of agricultural and other lands. Accommodating population and economic growth through travel- and energy-efficient land use provides GHG-efficient growth, reducing GHGs from both transportation and building energy use. GHGs can be further reduced at the project level through implementing energy-efficient construction and travel demand management approaches. Further, the State's understanding of transportation impacts continues to evolve. The CEQA Guidelines are being updated to focus the analysis of transportation impacts on VMT. OPR's Technical Advisory includes methods of analysis of transportation impacts, approaches to setting significance thresholds, and includes examples of VMT mitigation under CEQA. (*Id.* at p. 102.)

Also, the Scoping Plan includes the following item as a "Recommended Action": "forthcoming statewide implementation of SB 743[.]" (*Id*. at p. 103.)

Achieving 15 percent lower per capita (residential) or per employee (office) VMT than existing development is both generally achievable and is supported by evidence that connects this level of reduction to the State's emissions goals. The following pages describe a series of screening thresholds below which a detailed analysis may not be required. Next, this advisory describes numeric thresholds recommended for various project types. Finally, this advisory describes the analysis for certain unique circumstances.

1. Screening Thresholds for Land Use Projects

Many agencies use "screening thresholds" to quickly identify when a project should be expected to cause a less-than-significant impact without conducting a detailed study. (See e.g., CEQA Guidelines, §§ 15063(c)(3)(C), 15128, and Appendix G.) As explained below, this technical advisory suggests that lead agencies may screen out VMT impacts using project size, maps, and transit availability.

Screening Threshold for Small Projects

Many local agencies have developed screening thresholds to indicate when detailed analysis is needed. Absent substantial evidence indicating that a project would generate a potentially significant level of VMT, or inconsistency with a Sustainable Communities Strategy (SCS) or general plan, projects that generate or attract fewer than 110 trips per day[6] generally may be assumed to cause a less-than-significant transportation impact.

Map-Based Screening for Residential and Office Projects

Residential and office projects that locate in areas with low VMT, and that incorporate similar features (i.e., density, mix of uses, transit accessibility), will tend to exhibit similarly low VMT. Maps created with data from a travel survey or travel demand model can illustrate areas that are currently below threshold VMT (see recommendations below). Because new development in such locations would likely result in a similar level of VMT, such maps can be used to screen out residential and office projects from needing to prepare a detailed VMT analysis.

[6] CEQA provides a categorical exemption for existing facilities, including additions to existing structures of up to 10,000 square feet, so long as the project is in an area where public infrastructure is available to allow for maximum planned development and the project is not in an environmentally sensitive area. (CEQA Guidelines, § 15301, subd. (e)(2).) Typical project types for which trip generation increases relatively linearly with building footprint (i.e., general office building, single tenant office building, office park, and business park) generate or attract an additional 110-124 trips per 10,000 square feet. Therefore, absent substantial evidence otherwise, it is reasonable to conclude that the addition of 110 or fewer trips could be considered not to lead to a significant impact.

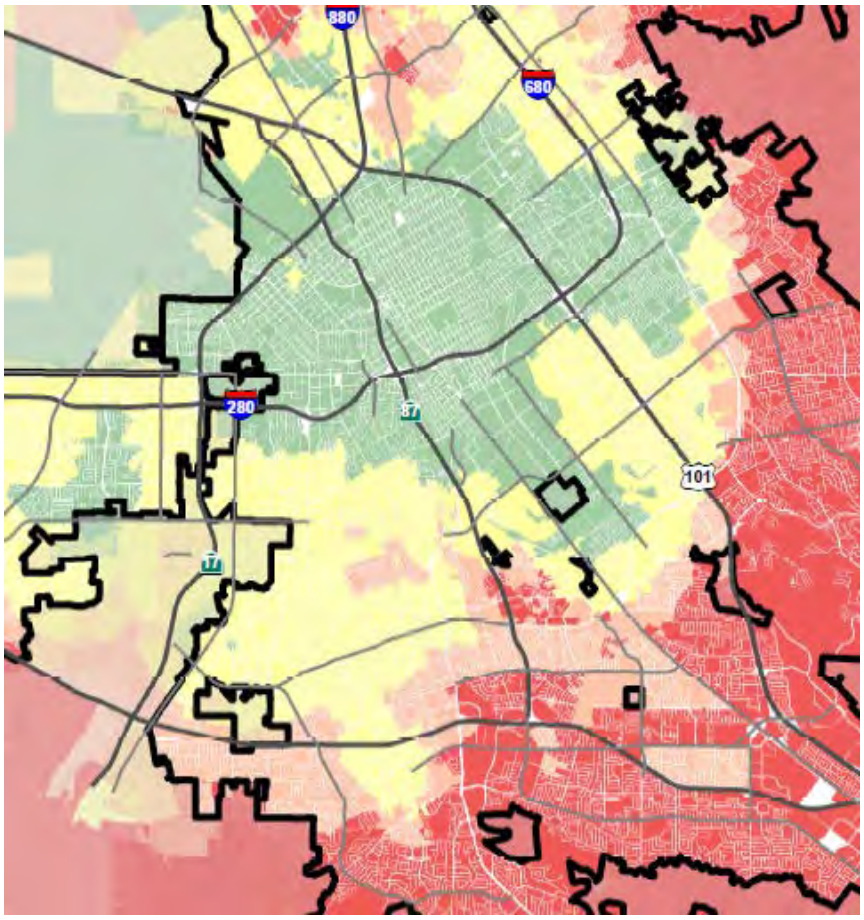


Figure 2. Example map of household VMT that could be used to delineate areas eligible to receive streamlining for VMT analysis. (Source: City of San José, Department of Transportation, draft output of City Transportation Model.)

Presumption of Less Than Significant Impact Near Transit Stations

Proposed CEQA Guideline Section 15064.3, subdivision (b)(1), states that lead agencies generally should presume that certain projects (including residential, retail, and office projects, as well as projects that are a mix of these uses) proposed within ½ mile of an existing major transit stop[7] or an existing stop along a high quality transit corridor[8] will have a less-than-significant impact on VMT. This presumption would not apply, however, if project-specific or location-specific information indicates that the project

[7] Pub. Resources Code, § 21064.3 ("'Major transit stop' means a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.").

[8] Pub. Resources Code, § 21155 ("For purposes of this section, a high-quality transit corridor means a corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours.").

will still generate significant levels of VMT. For example, the presumption might not be appropriate if the project:

- Has a Floor Area Ratio (FAR) of less than 0.75
- Includes more parking for use by residents, customers, or employees of the project than required by the jurisdiction (if the jurisdiction requires the project to supply parking)
- Is inconsistent with the applicable Sustainable Communities Strategy (as determined by the lead agency, with input from the Metropolitan Planning Organization)

If any of these exceptions to the presumption might apply, the lead agency should conduct a detailed VMT analysis to determine whether the project would exceed VMT thresholds (see below).

2. Recommended Numeric Thresholds for Residential, Office, and Retail Projects

Recommended threshold for residential projects: A proposed project exceeding a level of 15 percent below existing VMT per capita may indicate a significant transportation impact. Existing VMT per capita may be measured as regional VMT per capita or as city VMT per capita. Proposed development referencing city VMT per capita should not cumulatively exceed the number of units specified in the SCS for that city, and should be consistent with the SCS.

Residential development that would generate vehicle travel that is 15 or more percent below the existing residential VMT per capita, measured against the region or city, may indicate a less-than-significant transportation impact. In MPO areas, development measured against city VMT per capita (rather than regional VMT per capita) should not cumulatively exceed the population or number of units specified in the SCS for that city because greater-than-planned amounts of development in areas above the region-based threshold would undermine the VMT containment needed to achieve regional targets under SB 375.

For residential projects in unincorporated county areas, the local agency can compare a residential project's VMT to (1) the region's VMT per capita, or (2) the aggregate population-weighted VMT per capita of all cities in the region. In MPO areas, development in unincorporated areas measured against aggregate city VMT per capita (rather than regional VMT per capita) should not cumulatively exceed the population or number of units specified in the SCS for that city because greater-than-planned amounts of development in areas above the regional threshold would undermine achievement of regional targets under SB 375.

These thresholds can be applied to either household (i.e., tour-based) VMT or home-based (i.e., trip-based) VMT assessments.[9] It is critical, however, that the agency be consistent in its VMT measurement

[9] See Appendix 1 for a description of these approaches.

approach throughout the analysis to maintain an "apples-to-apples" comparison. For example, if the agency uses a home-based VMT for the threshold, it should also be use home-based VMT for calculating project VMT and VMT reduction due to mitigation measures.

Recommended threshold for office projects: A proposed project exceeding a level of 15 percent below existing regional VMT per employee may indicate a significant transportation impact.

Office projects that would generate vehicle travel exceeding 15 percent below existing VMT per employee for the region may indicate a significant transportation impact. In cases where the region is substantially larger than the geography over which most workers would be expected to live, it might be appropriate to refer to a smaller geography, such as the county, that includes the area over which nearly all workers would be expected to live.

Office VMT screening maps can be developed using tour-based data, considering either total employee VMT or employee work tour VMT. Similarly, tour-based analysis of office project VMT could consider either total employee VMT or employee work tour VMT. Where tour-based information is unavailable for threshold determination, project assessment, or assessment of mitigation, home-based work trip VMT should be used throughout all steps of the analysis to maintain an "apples-to-apples" comparison.

Recommended threshold for retail projects: A net increase in total VMT may indicate a significant transportation impact.

Because new retail development typically redistributes shopping trips rather than creating new trips,[10] estimating the total change in VMT (i.e., the difference in total VMT in the area affected with and without the project) is the best way to analyze a retail project's transportation impacts.

By adding retail opportunities into the urban fabric and thereby improving retail destination proximity, local-serving retail development tends to shorten trips and reduce VMT. Thus, lead agencies generally may presume such development creates a less-than-significant transportation impact. Regional-serving retail development, on the other hand, which can lead to substitution of longer trips for shorter ones, may tend to have a significant impact. Where such development decreases VMT, lead agencies should consider the impact to be less-than-significant.

Many cities and counties define local-serving and regional-serving retail in their zoning codes. Lead agencies may refer to those local definitions when available, but should also consider any project-specific information, such as market studies or economic impacts analyses that might bear on customers' travel behavior. Because lead agencies will best understand their own communities and the likely travel behaviors of future project users, they are likely in the best position to decide when a

[10] Lovejoy, et al., *Measuring the impacts of local land-use policies on vehicle miles of travel: The case of the first big-box store in Davis, California, The Journal of Transport and Land Use*, 2013.

project will likely be local-serving. Generally, however, retail development including stores larger than 50,000 square feet might be considered regional-serving, and so lead agencies should undertake an analysis to determine whether the project might increase or decrease VMT.

Mixed-Use Projects

Lead agencies can evaluate each component of a mixed-use project independently and apply the significance threshold for each project type included (e.g., residential and retail). Alternatively, a lead agency may consider only the project's dominant use. In the analysis of each use, a project should take credit for internal capture. Combining different land uses and applying one threshold to those land uses may result in an inaccurate impact assessment.

Other Project Types

Of land use projects, residential, office, and retail projects tend to have the greatest influence on VMT. For that reason, OPR recommends the quantified thresholds described above for purposes of analysis and mitigation. Lead agencies, using more location-specific information, may develop their own more specific thresholds, which may include other land use types. In developing thresholds for other project types, or thresholds different from those recommended here, lead agencies should consider the purposes described in section 21099 of the Public Resources Code and regulations in the CEQA Guidelines on the development of thresholds of significance (e.g., CEQA Guidelines, § 15064.7).

Strategies and projects that decrease local VMT but increase total VMT should be avoided. Agencies should consider whether their actions encourage development in a less travel-efficient location by limiting development in travel-efficient locations.

Redevelopment Projects

Where a project replaces existing VMT-generating land uses, if the replacement leads to a net overall decrease in VMT, the project would lead to a less-than-significant transportation impact. If the project leads to a net overall increase in VMT, then the thresholds described above should apply.

If a residential or office project leads to a net increase in VMT, then the project's VMT per capita (residential) or per employee (office) should be compared to thresholds recommended above. Per capita and per employee VMT are efficiency metrics, and, as such, apply only to the existing project without regard to the VMT generated by the previously existing land use.

If the project leads to a net increase in provision of locally-serving retail, transportation impacts from the retail portion of the development should be presumed to be less than significant. If the project consists of regionally-serving retail, and increases overall VMT compared to with existing uses, then the project would lead to a significant transportation impact.

RTP-SCS Consistency (All Land Use Projects)

Section 15125, subdivision (d), of the CEQA Guidelines provides that lead agencies should analyze impacts resulting from inconsistencies with regional plans, including regional transportation plans. For this reason, if a project is inconsistent with the Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS), the lead agency should evaluate whether that inconsistency indicates a significant impact on transportation.

3. Recommendations Regarding Land Use Plans

As with projects, agencies should analyze VMT outcomes of land use plans over the full area over which the plan may substantively affect travel patterns, including beyond the boundary of the plan or jurisdiction's geography. Analysis of specific plans may employ the same thresholds described above for projects. A general plan, area plan, or community plan may have a significant impact on transportation if it is not consistent with the relevant RTP-SCS.

Thresholds for plans in non-MPO areas may be determined on a case-by-case basis.

4. Other Considerations

Rural Projects Outside of MPOs

In rural areas of non-MPO counties (i.e., areas not near established or incorporated cities or towns), fewer options may be available for reducing VMT, and significance thresholds may be best determined on a case-by-case basis. Note, however, that clustered small towns and small town main streets may have substantial VMT benefits compared to isolated rural development, similar to the transit oriented development described above.

Impacts to Transit

Because criteria for determining the significance of transportation impacts must promote "the development of multimodal transportation networks" pursuant to Public Resources Code section 21099, subd. (b)(1), lead agencies should consider project impacts to transit systems and bicycle and pedestrian networks. For example, a project that blocks access to a transit stop or blocks a transit route itself may interfere with transit functions. Lead agencies should consult with transit agencies as early as possible in the development process, particularly for projects that are located within one half mile of transit stops.

When evaluating impacts to multimodal transportation networks, lead agencies generally should not treat the addition of new transit users as an adverse impact. An infill development may add riders to transit systems and the additional boarding and alighting may slow transit vehicles, but it also adds

destinations, improving proximity and accessibility. Such development also improves regional vehicle flow by adding less vehicle travel onto the regional network.

Increased demand throughout a region may, however, cause a cumulative impact by requiring new or additional transit infrastructure. Such impacts may be adequately addressed through a fee program that fairly allocates the cost of improvements not just to projects that happen to locate near transit, but rather across a region to all projects that impose burdens on the entire transportation system, since transit can broadly improve the function of the transportation system.

F. Considering the Effects of Transportation Projects on Vehicle Travel

Many transportation projects change travel patterns. A transportation project which leads to additional vehicle travel on the roadway network, commonly referred to as "induced vehicle travel," would need to quantify the amount of additional vehicle travel in order to assess air quality impacts, greenhouse gas emissions impacts, energy impacts, and noise impacts. Transportation projects also are required to examine induced growth impacts under CEQA. (See generally, Pub. Resources Code, §§ 21065 [defining "project" under CEQA as an activity as causing either a direct or reasonably foreseeable indirect physical change], 21065.3 [defining "project-specific effect" to mean all direct or indirect environmental effects], 21100, subd. (b) [required contents of an EIR].) For any project that increases vehicle travel, explicit assessment and quantitative reporting of the amount of additional vehicle travel should not be omitted from the document; such information may be useful and necessary for a full understanding of a project's environmental impacts. (See Pub. Resources Code, §§ 21000, 21001, 21001.1, 21002, 21002.1 [discussing the policies of CEQA].) A lead agency that uses the VMT metric to assess the transportation impacts of a transportation project may simply report that change in VMT as the impact. When the lead agency uses another metric to analyze the transportation impacts of a roadway project, changes in amount of vehicle travel added to the roadway network should still be analyzed and reported. (See, e.g., California Department of Transportation, Guidance for Preparers of Growth-related, Indirect Impact Analyses (2006).)

While CEQA does not require perfection, it is important to make a reasonably accurate estimate of transportation projects' effects on vehicle travel in order to make reasonably accurate estimates of GHG emissions, air quality emissions, energy impacts, and noise impacts. (See, e.g., *California Clean Energy Com. v. City of Woodland* (2014) 225 Cal.App.4th 173, 210 [EIR failed to consider project's transportation energy impacts]; *Ukiah Citizens for Safety First v. City of Ukiah* (2016) 248 Cal.App.4th 256, 266.) Appendix 2 describes in detail the causes of induced vehicle travel, the robust empirical evidence of induced vehicle travel, and how models and research can be used in conjunction to quantitatively assess induced vehicle travel with reasonable accuracy.

If a project would likely lead to a measurable and substantial increase in vehicle travel, the lead agency should conduct an analysis assessing the amount of vehicle travel the project will induce. Project types that would likely lead to a measurable and substantial increase in vehicle travel generally include:

- Addition of through lanes on existing or new highways, including general purpose lanes, HOV lanes, peak period lanes, auxiliary lanes, or lanes through grade-separated interchanges

Projects that would not likely lead to a substantial or measurable increase in vehicle travel, and therefore generally should not require an induced travel analysis, include:

- Rehabilitation, maintenance, replacement and repair projects designed to improve the condition of existing transportation assets (e.g., highways, roadways, bridges, culverts, tunnels, transit systems, and assets that serve bicycle and pedestrian facilities) and that do not add additional motor vehicle capacity
- Roadway shoulder enhancements to provide "breakdown space," dedicated space for use only by transit vehicles, to provide bicycle access, or to otherwise improve safety, but which will not be used as automobile vehicle travel lanes
- Addition of an auxiliary lane of less than one mile in length designed to improve roadway safety
- Installation, removal, or reconfiguration of traffic lanes that are not for through traffic, such as left, right, and U-turn pockets, or emergency breakdown lanes that are not utilized as through lanes
- Addition of roadway capacity on local or collector streets provided the project also substantially improves conditions for pedestrians, cyclists, and, if applicable, transit
- Conversion of existing general purpose lanes (including ramps) to managed lanes or transit lanes, or changing lane management in a manner that would not substantially increase vehicle travel
- Addition of a new lane that is permanently restricted to use only by transit vehicles
- Reduction in number of through lanes
- Grade separation to separate vehicles from rail, transit, pedestrians or bicycles, or to replace a lane in order to separate preferential vehicles (e.g., HOV, HOT, or trucks) from general vehicles
- Installation, removal, or reconfiguration of traffic control devices, including Transit Signal Priority (TSP) features
- Traffic metering systems
- Timing of signals to optimize vehicle, bicycle, or pedestrian flow
- Installation of roundabouts or traffic circles
- Installation or reconfiguration of traffic calming devices
- Adoption of or increase in tolls
- Addition of tolled lanes, where tolls are sufficient to mitigate VMT increase
- Initiation of new transit service
- Conversion of streets from one-way to two-way operation with no net increase in number of traffic lanes
- Removal or relocation of off-street or on-street parking spaces
- Adoption or modification of on-street parking or loading restrictions (including meters, time limits, accessible spaces, and preferential/reserved parking permit programs)
- Addition of traffic wayfinding signage

- Rehabilitation and maintenance projects that do not add motor vehicle capacity
- Addition of new or enhanced bike or pedestrian facilities on existing streets/highways or within existing public rights-of-way
- Addition of Class I bike paths, trails, multi-use paths, or other off-road facilities that serve non-motorized travel
- Installation of publicly available alternative fuel/charging infrastructure
- Addition of passing lanes in rural areas that do not increase overall vehicle capacity along the corridor

1. Recommended Significance Threshold for Transportation Projects

As noted in Section 15064.3 of the CEQA Guidelines, lead agencies for roadway capacity projects have discretion, consistent with CEQA and planning requirements, to choose which metric to use to evaluate transportation impacts. This section recommends considerations for evaluating impacts using vehicle miles traveled. Lead agencies have discretion to choose a threshold of significance for transportation projects as they do for other types of projects. As explained above, Public Resources Code section 21099, subdivision (b)(1), provides that criteria for determining the significance of transportation impacts must promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses.

Whether adopting a threshold of significance, or evaluating transportation impacts on a case-by-case basis, a lead agency should ensure that the analysis addresses:

- Direct, indirect and cumulative effects of the transportation project (CEQA Guidelines, § 15064, subds. (d), (h))
- Near-term and long-term effects of the transportation project (CEQA Guidelines, §§ 15063, subd. (a)(1), 15126.2, subd. (a))
- The transportation project's consistency with state greenhouse gas reduction goals (Pub. Resources Code, § 21099)[11]
- The impact of the transportation project on the development of multimodal transportation networks (Pub. Resources Code, § 21099)

[11] The Air Resources Board has ascertained, in *The 2017 Climate Change Scoping Plan: The Strategy for Achieving California's 2030 Greenhouse Gas Target* (p. 116) and *Mobile Source Strategy* (p. 37), the limits of VMT growth compatible with California containing greenhouse gas emissions to levels research shows would allow for climate stabilization. The Staff Report on Proposed Update to the SB 375 Greenhouse Gas Emission Reduction Targets (Figure 1, p. 10, and Figure 2, p. 23), illustrates that Regional Transportation Plans and Sustainable Communities Strategies will fall short of achieving GHG reductions research says is needed to achieve climate stabilization, so OPR recommends not basing transportation project thresholds on those documents.

- The impact of the transportation project on the development of a diversity of land uses (Pub. Resources Code, § 21099)

The recommendations in this technical advisory may be updated over time.

2. Estimating VMT Impacts from Transportation Projects

CEQA requires analysis of a project's potential growth-inducing impacts. (Pub. Resources Code, § 21100, subd. (b)(5); CEQA Guidelines, § 15126.2, subd. (d).) Many agencies are familiar with the analysis of growth inducing impacts associated with water, sewer, and other infrastructure. This technical advisory addresses growth that may be expected from roadway expansion projects.

Because a roadway expansion project can induce substantial VMT, incorporating quantitative estimates of induced VMT is critical to calculating both transportation and other impacts of these projects. Induced travel also has the potential to reduce or eliminate congestion relief benefits. An accurate estimate of induced travel is needed to accurately weigh costs and benefits of a highway capacity expansion project.

The effect of a transportation project on vehicle travel should be estimated using the "change in total VMT" method described in *Appendix 1*. This means that an assessment of total VMT without the project and an assessment with the project should be made; the difference between the two is the amount of VMT attributable to the project. The assessment should cover the full area in which driving patterns are expected to change. As with other types of projects, the VMT estimation should not be truncated at a modeling or jurisdictional boundary for convenience of analysis when travel behavior is substantially affected beyond that boundary.

Transit and Active Transportation Projects

Transit and active transportation projects generally reduce VMT and therefore are presumed to cause a less-than-significant impact on transportation. This presumption may apply to all passenger rail projects, bus and bus rapid transit projects, and bicycle and pedestrian infrastructure projects. Streamlining transit and active transportation projects aligns with each of the three statutory goals contained in SB 743 by reducing GHG emissions, increasing multimodal transportation networks, and facilitating mixed use development.

Roadway Projects

Reducing roadway capacity (for example, by removing or repurposing motor vehicle travel lanes) will generally reduce VMT and therefore is presumed to cause a less-than-significant impact on transportation. Generally, no transportation analysis is needed for such projects.

Building new roadways, adding roadway capacity in congested areas, or adding roadway capacity to areas where congestion is expected in the future, typically induces additional vehicle travel. For the types of projects previously indicated as likely to lead to additional vehicle travel, an estimate should be made of the change in vehicle travel resulting from the project.

For projects that increase roadway capacity, lead agencies can evaluate induced travel quantitatively by applying the results of existing studies that examine the magnitude of the increase of VMT resulting from a given increase in lane miles. These studies estimate the percent change in VMT for every percent change in miles to the roadway system (i.e., "elasticity"). (See U.C. Davis, Institute for Transportation Studies, *Increasing Highway Capacity Unlikely to Relieve Traffic Congestion*, (October 2015); Boarnet and Handy, *Impact of Highway Capacity and Induced Travel on Passenger Vehicle Use and Greenhouse Gas Emissions*, California Air Resources Board Policy Brief, September 30, 2014.) Given that lead agencies have discretion in choosing their methodology, and the studies on induced travel reveal a range of elasticities, lead agencies may appropriately apply professional judgment in studying the transportation effects of a particular project. The most recent major study (Duranton and Turner, 2011), estimates an elasticity of 1.0, meaning that every percent change in lane miles results in a one percent increase in VMT.

To estimate VMT impacts from roadway expansion projects:

1. Determine the total lane-miles over an area that fully captures travel behavior changes resulting from the project (generally the region, but for projects affecting interregional travel look at all affected regions).
2. Determine the percent change in total lane miles that will result from the project.
3. Determine the total existing VMT over that same area.
4. Multiply the percent increase in lane miles by the existing VMT, and then multiply that by the elasticity from the induced travel literature:

[% increase in lane miles] x [existing VMT] x [elasticity] = [VMT resulting from the project]

This method would not be suitable for rural (non-MPO) locations in the state which are neither congested nor projected to become congested. It also may not be suitable for a new road that provides new connectivity across a barrier (e.g., a bridge across a river) if it would be expected to substantially shorten existing trips. If it is likely to be substantial, the trips-shortening effect should be examined explicitly.

The effects of roadway capacity on vehicle travel can also be applied at a programmatic level. For example, in a regional planning process the lead agency can use that program-level analysis to streamline later project-level analysis. (See CEQA Guidelines, § 15168.) A program-level analysis of VMT should include effects of the program on land use patterns, and the VMT that results from those land use effects. In order for a program-level document to adequately analyze potential induced demand

from a project or program of roadway capacity expansion, lead agencies cannot assume a fixed land use pattern (i.e., a land use pattern that does not vary in response to the provision of roadway capacity). A proper analysis should account for land use investment and development pattern changes that react in a reasonable manner to changes in accessibility created by transportation infrastructure investments (whether at the project or program level).

Mitigation and Alternatives

Induced VMT has the potential to reduce or eliminate congestion relief benefits, increase VMT, and increase other environmental impacts that result from vehicle travel.[12] If those effects are significant, the lead agency will need to consider mitigation or alternatives. In the context of increased travel that is induced by capacity increases, appropriate mitigation and alternatives that a lead agency might consider include the following:

- Tolling new lanes to encourage carpools and fund transit improvements
- Converting existing general purpose lanes to HOV or HOT lanes
- Implementing or funding off-site travel demand management
- Implementing Intelligent Transportation Systems (ITS) strategies to improve passenger throughput on existing lanes

Tolling and other management strategies can have the additional benefit of preventing congestion and maintaining free-flow conditions, conferring substantial benefits to road users as discussed above.

G. Analyzing Other Impacts Related to Transportation

While requiring a change in the methodology of assessing transportation impacts, Public Resources Code section 21099 notes that this change "does not relieve a public agency of the requirement to analyze a project's potentially significant transportation impacts related to air quality, noise, safety, or any other impact associated with transportation." OPR expects that lead agencies will continue to address mobile source emissions in the air quality and noise sections of an environmental document and the corresponding studies that support the analysis in those sections. Lead agencies should continue to address environmental impacts of a proposed project pursuant to CEQA's requirements, using a format that is appropriate for their particular project.

Because safety concerns result from many different factors, they are best addressed at a programmatic level (i.e., in a general plan or regional transportation plan) in cooperation with local governments,

[12] See *Increasing Highway Capacity Unlikely to Relieve Traffic Congestion*, National Center for Sustainable Transportation, October 2015, available at http://www.dot.ca.gov/newtech/researchreports/reports/2015/10-12-2015-NCST_Brief_InducedTravel_CS6_v3.pdf; see Duranton and Turner, *The Fundamental Law of Road Congestion: Evidence from US cities,* 2011, available at http://www.nber.org/papers/w15376.

metropolitan planning organizations, and, where the state highway system is involved, the California Department of Transportation. In most cases, such an analysis would not be appropriate on a project-by-project basis. Increases in traffic volumes at a particular location resulting from a project typically cannot be estimated with sufficient accuracy or precision to provide useful information for an analysis of safety concerns. Moreover, an array of factors affect travel demand (e.g., strength of the local economy, price of gasoline), causing substantial additional uncertainty. Appendix B of the General Plan Guidelines summarizes research which could be used to guide a programmatic analysis under CEQA. Lead agencies should note that automobile congestion or delay does not constitute a significant environmental impact (Pub. Resources Code, §21099(b)(2)), and safety should not be used as a proxy for road capacity.

H. VMT Mitigation and Alternatives

When a lead agency identifies a significant impact, it must identify feasible mitigation measures that could avoid or substantially reduce that impact. (Pub. Resources Code, § 21002.1, subd. (a).) Additionally, CEQA requires that an environmental impact report identify feasible alternatives that could avoid or substantially reduce a project's significant environmental impacts.

Indeed, the California Court of Appeal recently held that a long-term regional transportation plan was deficient for failing to discuss an alternative which could significantly reduce total vehicle miles traveled. In *Cleveland National Forest Foundation v. San Diego Association of Governments, et al.* (2017) 17 Cal.App.5th 413, the court found that omission "inexplicable" given the lead agency's "acknowledgment in its Climate Action Strategy that the state's efforts to reduce greenhouse gas emissions from on-road transportation will not succeed if the amount of driving, or vehicle miles traveled, is not significantly reduced." (*Cleveland National Forest Foundation*, *supra*, 17 Cal.App.5th at p. 436.) Additionally, the court noted that the project alternatives focused primarily on congestion relief even though "the [regional] transportation plan is a long-term and congestion relief is not necessarily an effective long-term strategy." (*Id.* at p. 437.) The court concluded its discussion of the alternatives analysis by stating: "Given the acknowledged long-term drawbacks of congestion relief alternatives, there is not substantial evidence to support the EIR's exclusion of an alternative focused primarily on significantly reducing vehicle trips." (*Ibid*.)

Several examples of potential mitigation measures and alternatives to reduce vehicle miles traveled are described below. However, the selection of particular mitigation measures and alternatives are left to the discretion of the lead agency, and mitigation measures may vary, depending on the proposed project and significant impacts, if any. Further, OPR expects that agencies will continue to innovate and find new ways to reduce vehicular travel.

Potential measures to reduce vehicle miles traveled include, but are not limited to:

- Improve or increase access to transit.
- Increase access to common goods and services, such as groceries, schools, and daycare.

- Incorporate affordable housing into the project.
- Incorporate neighborhood electric vehicle network.
- Orient the project toward transit, bicycle and pedestrian facilities.
- Improve pedestrian or bicycle networks, or transit service.
- Provide traffic calming.
- Provide bicycle parking.
- Limit or eliminate parking supply.
- Unbundle parking costs.
- Provide parking or roadway pricing or cash-out programs.
- Implement or provide access to a commute reduction program.
- Provide car-sharing, bike sharing, and ride-sharing programs.
- Provide transit passes.
- Shifting single occupancy vehicle trips to carpooling or vanpooling, for example providing ride-matching services.
- Providing telework options.
- Providing incentives or subsidies that increase the use of modes other than single-occupancy vehicle.
- Providing on-site amenities at places of work, such as priority parking for carpools and vanpools, secure bike parking, and showers and locker rooms.
- Providing employee transportation coordinators at employment sites.
- Providing a guaranteed ride home service to users of non-auto modes.

Notably, because VMT is largely a regional impact, regional VMT-reduction programs may be an appropriate form of mitigation. In lieu fees have been found to be valid mitigation where there is both a commitment to pay fees and evidence that mitigation will actually occur. (*Save Our Peninsula Committee v. Monterey County Bd. of Supervisors* (2001) 87 Cal.App.4th 99, 140-141; *Gentry v. City of Murrieta* (1995) 36 Cal.App.4th 1359; *Kings County Farm Bureau v. City of Hanford* (1990) 221 Cal.App.3d 692, 727–728.) Fee programs are particularly useful to address cumulative impacts. (CEQA Guidelines, § 15130, subd. (a)(3) [a "project's incremental contribution is less than cumulatively considerable if the project is required to implement or fund its fair share of a mitigation measure or measures designed to alleviate the cumulative impact"].) The mitigation program must undergo CEQA evaluation, either on the program as a whole, or the in-lieu fees or other mitigation must be evaluated on a project-specific basis. (*California Native Plant Society v. County of El Dorado* (2009) 170 Cal.App.4th 1026.) That CEQA evaluation could be part of a larger program, such as a regional transportation plan, analyzed in a Program EIR. (CEQA Guidelines, § 15168.)

Examples of project alternatives that may reduce vehicle miles traveled include, but are not limited to:

- Locate the project in an area of the region that already exhibits low VMT.
- Locate the project near transit.
- Increase project density.
- Increase the mix of uses within the project or within the project's surroundings.

- Increase connectivity and/or intersection density on the project site.
- Deploy management strategies (e.g., pricing, vehicle occupancy requirements) on roadways or roadway lanes.

Appendix 1. Considerations About Which VMT to Count

Consistent with the obligation to make a good faith effort to disclose the environmental consequences of a project, lead agencies have discretion to choose the most appropriate methodology to evaluate project impacts.[13] A lead agency can evaluate a project's effect on VMT in numerous ways. The purpose of this document is to provide technical considerations in determining which methodology may be most useful for various project types.

Background on Estimating Vehicle Miles Traveled

Before discussing specific methodological recommendations, this section provides a brief overview of modeling and counting VMT, including some key terminology.

Here is an illustrative example of some methods of estimating vehicle miles traveled. Consider the following hypothetical travel day (all by automobile):

1. Residence to Coffee Shop
2. Coffee Shop to Work
3. Work to Sandwich Shop
4. Sandwich Shop to Work
5. Work to Residence
6. Residence to Store
7. Store to Residence

Trip-based assessment of a project's effect on travel behavior counts VMT from individual trips to and from the project. It is the most basic, and traditionally the most common, method of counting VMT. A trip-based VMT assessment of the residence in the above example would consider segments 1, 5, 6 and 7. For residential projects, the sum of home-based trips is called *home-based* VMT.

A *tour-based* assessment counts the entire home-back-to-home tour that includes the project. A tour-based VMT assessment of the residence in the above example would consider segments 1, 2, 3, 4, and 5 in one tour, and 6 and 7 in a second tour. A tour-based assessment of the workplace would include segments 1, 2, 3, 4, and 5. Together, all tours comprise *household* VMT.

[13] The California Supreme Court has explained that when an agency has prepared an environmental impact report:

> [T]he issue is not whether the [lead agency's] studies are irrefutable or whether they could have been better. The relevant issue is only whether the studies are sufficiently credible to be considered as part of the total evidence that supports the [lead agency's] finding[.]

(*Laurel Heights Improvement Assn. v. Regents of the University of California* (1988) 47 Cal.3d 376, 409; see also *Eureka Citizens for Responsible Gov't v. City of Eureka* (2007) 147 Cal.App.4th 357, 372.)

Both trip- and tour-based assessments can be used as measures of transportation efficiency, using denominators such as per capita, per employee, or per person-trip.

Trip- and Tour-based Assessment of VMT

As illustrated above, a tour-based assessment of VMT is a more complete characterization of a project's effect on VMT. In many cases, a project affects travel behavior beyond the first destination. The location and characteristics of the home and workplace will often be the main drivers of VMT. For example, a residential or office development located near high quality transit will likely lead to some commute trips utilizing transit, affecting mode choice on the rest of the tour.

Characteristics of an office project can also affect an employee's VMT beyond the work tour. For example, a workplace located at the urban periphery, far from transit, can require an employee to own a car, which in turn affects the entirety of an employee's travel behavior and VMT. For this reason, when estimating the effect of an office development on VMT, it may be appropriate to consider total employee VMT if data and tools, such as tour-based models, are available. This is consistent with CEQA's requirement to evaluate both direct and *indirect* effects of a project. (See CEQA Guidelines, § 15064, subd. (d)(2).)

Assessing Change in Total VMT

A third method, estimating the *change in total VMT* with and without the project, can evaluate whether a project is likely to divert existing trips, and what the effect of those diversions will be on total VMT. This method answers the question, "What is the net effect of the project on area VMT?" As an illustration, assessing the total change in VMT for a grocery store built in a food desert that diverts trips from more distant stores could reveal a net VMT reduction. The analysis should address the full area over which the project affects travel behavior, even if the effect on travel behavior crosses political boundaries.

Using Models to Estimate VMT

Travel demand models, sketch models, spreadsheet models, research, and data can all be used to calculate and estimate VMT (see Appendix F of the preliminary discussion draft). To the extent possible, lead agencies should choose models that have sensitivity to features of the project that affect VMT. Those tools and resources can also assist in establishing thresholds of significance and estimating VMT reduction attributable to mitigation measures and project alternatives. When using models and tools for those various purposes, agencies should use comparable data and methods, in order to set up an "apples-to-apples" comparison between thresholds, VMT estimates, and VMT mitigation estimates.

Models can work together. For example, agencies can use travel demand models or survey data to estimate existing trip lengths and input those into sketch models such as CalEEMod to achieve more

accurate results. Whenever possible, agencies should input localized trip lengths into a sketch model to tailor the analysis to the project location. However, in doing so, agencies should be careful to avoid double counting if the sketch model includes other inputs or toggles that are proxies for trip length (e.g., distance to city center). Generally, if an agency changes any sketch model defaults, it should record and report those changes for transparency of analysis. Again, trip length data should come from the same source as data used to calculate thresholds to be sure of an "apples-to-apples" comparison.

Additional background information regarding travel demand models is available in the California Transportation Commission's "2010 Regional Transportation Plan Guidelines," beginning at page 35.

Appendix 2. Induced Travel: Mechanisms, Research, and Additional Assessment Approaches

Induced travel occurs where roadway capacity is expanded in an area of present or projected future congestion. The effect typically manifests over several years. Lower travel times make the modified facility more attractive to travelers, resulting in the following trip-making changes:

- **Longer trips.** The ability to travel a long distance in a shorter time increases the attractiveness of destinations that are farther away, increasing trip length and vehicle travel.
- **Changes in mode choice.** When transportation investments are devoted to reducing automobile travel time, travelers tend to shift toward automobile use from other modes, which increases vehicle travel.
- **Route changes.** Faster travel times on a route attract more drivers to that route from other routes, which can increase or decrease vehicle travel depending on whether it shortens or lengthens trips.
- **Newly generated trips.** Increasing travel speeds can induce additional trips, which increases vehicle travel. For example, an individual who previously telecommuted or purchased goods on the internet might choose to accomplish those tasks via automobile trips as a result of increased speeds.
- **Land Use Changes.** Faster travel times along a corridor lead to land development farther along that corridor; that new development generates and attracts longer trips, which increases vehicle travel. Over several years, this induced growth component of induced vehicle travel can be substantial, making it critical to include in analyses.

Each of these effects has implications for the total amount of vehicle travel. These effects operate over different time scales. For example, changes in mode choice might occur immediately, while land use changes typically take a few years or longer. CEQA requires lead agencies to analyze both short-term and long-term effects.

Evidence of Induced Vehicle Travel. A large number of peer reviewed studies[14] have demonstrated a causal link between highway capacity increases and VMT increases. Many provide quantitative estimates of the magnitude of the induced VMT phenomenon. Collectively, they provide high quality evidence of the existence and magnitude of the induced travel effect.

Most of these studies express the amount of induced vehicle travel as an "elasticity," which is a multiplier that describes the additional vehicle travel resulting from an additional lane mile of roadway capacity added. For example, an elasticity of 0.6 would signify an 0.6 percent increase in vehicle travel for every 1.0 percent increase in lane miles. Many of these studies distinguish "short run elasticity" (increase in vehicle travel in the first few years) from "long run elasticity" (increase in vehicle travel

[14] See, for example, *Impact of Highway Capacity and Induced Travel on Passenger Vehicle Use and Greenhouse Gas Emissions: Policy Brief* (CARB, Sept. 30, 2014) and *Increasing Highway Capacity Unlikely to Relieve Traffic Congestion* (National Center for Sustainable Transportation, Oct. 2015).

beyond the first few years). Long run elasticity is larger than short run elasticity, because as time passes, more of the components of induced vehicle travel materialize. Generally, short run elasticity can be thought of as excluding the effects of land use change, while long run elasticity includes them. Most studies find a long run elasticity between 0.6 and just over 1.0 (See *Impact of Highway Capacity and Induced Travel on Passenger Vehicle Use and Greenhouse Gas Emissions: Policy Brief*, p. 2.), meaning that every increase in lanes miles of one percent leads to an increase in vehicle travel of 0.6 to 1.0 percent. The most recent major study (Duranton and Turner, *The Fundamental Law of Road Congestion: Evidence from US Cities*, 2011) finds the elasticity of vehicle travel by lanes miles added to be 1.03; in other words, each percent increase in lane miles results in a 1.03 percent increase in vehicle travel. (An elasticity greater than 1.0 can occur because new lanes induce vehicle travel that spills beyond the project location.) In CEQA analysis, the long-run elasticity should be used, as it captures the full effect of the project rather than just the early-stage effect.

Quantifying Induced Vehicle Travel Using Models. Lead agencies can generally achieve the most accurate assessment of induced vehicle travel resulting from roadway capacity increasing projects by applying elasticities from the academic literature, because those estimates include vehicle travel resulting from induced land use. If a lead agency chooses to use a travel demand model, additional analysis would be needed to account for induced land use. This section describes some approaches to undertaking that additional analysis.

Proper use of a travel demand model can capture the following components of induced VMT:

- Trip length (generally increases VMT)
- Mode shift (generally shifts from other modes toward automobile use, increasing VMT)
- Route changes (can act to increase or decrease VMT)
- Newly generated trips (generally increases VMT)
    - Note that not all travel demand models have sensitivity to this factor, so an off-model estimate may be necessary if this effect could be substantial.

However, estimating long-run induced VMT also requires an estimate of the project's effects on land use. This component of the analysis is important because it has the potential to be a large component of the overall induced travel effect. Options for estimating and incorporating the VMT effects that are caused by the subsequent land use changes include:

1. *Employ an expert panel.* An expert panel could assess changes to land use development that would likely result from the project. This assessment could then be analyzed by the travel demand model to assess effects on vehicle travel. Induced vehicle travel assessed via this approach should be verified using elasticities found in the academic literature.
2. *Adjust model results to align with the empirical research.* If the travel demand model analysis is performed without incorporating projected land use changes resulting from the project, the

assessed vehicle travel should be adjusted upward to account for those land use changes. The assessed VMT after adjustment should fall within the range found in the academic literature.

3. *Employ a land use model, running it iteratively with a travel demand model.* A land use model can be used to estimate the land use effects of a roadway capacity increase, and the traffic patterns that result from the land use change can then be fed back into the travel demand model. The land use model and travel demand model can be iterated to produce an accurate result.

A project which provides new connectivity across a barrier, such as a new bridge across a river, may provide a shortened path between existing origins and destinations, thereby shortening existing trips. In some cases, this trip-shortening effect might be substantial enough to reduce the amount of vehicle travel resulting from the project below the range found in the elasticities in the academic literature, or even lead a net reduction in vehicle travel overall. In such cases, the trip-shortening effect could be examined explicitly.

Whenever employing a travel demand model to assess induced vehicle travel, any limitation or known lack of sensitivity in the analysis that might cause substantial errors in the VMT estimate (for example, model insensitivity to one of the components of induced VMT described above) should be disclosed and characterized, and a description should be provided on how it could influence the analysis results. A discussion of the potential error or bias should be carried into analyses that rely on the VMT analysis, such as greenhouse gas emissions, air quality, energy, and noise.

MARIN COUNTY BOARD OF SUPERVISORS

ORDINANCE NO. 3776

AN ORDINANCE ADOPTING AMENDMENTS TO PORTIONS OF MARIN COUNTY CODE TITLE 19 (BUILDING CODE)

* *

The BOARD OF SUPERVISORS OF THE COUNTY OF MARIN hereby ordains as follows:

SECTION I. FINDINGS

WHEREAS, the Marin County Community Development Agency initiated proposed amendments to Marin County Code Title 19 (Building Code). The Building Code includes building and energy efficiency regulations that apply to the unincorporated areas of Marin County. The project includes proposed amendments including, but not limited to modifying green building requirements for new single family and duplex structures, new multi-family projects, new non-residential buildings or additions, remodeling and additions to residential structures, remodeling of multi-family projects and remodeling to non-residential structures; and

WHEREAS, the ordinance was introduced at a regular meeting of the Board of Supervisors on the 18th day of October 2022, and adopted by the Board of Supervisors of the County of Marin, State of California, on the 15th day of November 2022; and

WHEREAS, the proposed Marin County Code Title 19 changes implement the Marin Countywide Plan (CWP) programs AIR-4.a (reduce greenhouse gas emissions resulting from energy use in buildings), AIR-4.e. (reduce County government contributions to greenhouse gas emissions), EN-1.b (adopt energy efficiency standards for new and remodeled buildings), EN-1.c (implement the single-family dwelling energy efficiency ordinance), EN-1.d (explore energy efficiency standards for existing buildings), EN-1.f (explore regional collaboration, financing, and other incentives for programs that promote sustainable energy practices), EN-1.j (reduce energy use in County facilities), EN-2.d (facilitate renewable energy technologies and design), EN-3.a (require green building practices for residential development), EN-3.b (require green building practices for non-residential development), EN-3.f (facilitate green building practices), and WR-3.a. (support water conservation efforts); and

WHEREAS, an inventory of 2020 greenhouse gas emissions for the unincorporated county found that the use of energy in residential and non-residential buildings within the unincorporated County generates 28% of the County's total annual greenhouse gas emissions, 87% of which comes from the combustion of natural gas in buildings; and

WHEREAS, the Marin County Climate Action Plan 2030 identifies reducing building energy use, and specifically natural gas use, as one of the most effective means of meeting the

adopted goal of reducing the emissions of greenhouse gases to 40% below 1990 levels by the year 2030 for the unincorporated areas; and

WHEREAS, the Marin County Board of Supervisors adopted a resolution on June 15, 2021, declaring a climate emergency and reaffirming the County's commitment to reducing greenhouse gas emissions; and

WHEREAS, the California Global Warming Solutions Act of 2006, known as AB 32, established a statewide goal of reducing greenhouse gas emissions to 1990 levels by 2020 and to a level 80% below 1990 levels by 2050, and Senate Bill 32, passed in 2016, set a target to reduce statewide emissions to 40% below 1990 levels by 2030; and

WHEREAS, the State of California Air Resource Board Draft 2022 Scoping Plan states that greenhouse gas reductions from local efforts are important to support state-level measures and highlights building decarbonization as a priority strategy for greenhouse gas reduction; and

WHEREAS, through Senate Bill 100 the State of California has adopted a goal that renewable energy and zero-carbon resources supply 100 percent of electric retail sales to end-use customers by 2045; and

WHEREAS, Marin properties can currently access 100% renewable energy via MCE's Deep Green and PG&E's Solar Choice programs, and MCE expects to achieve 95% GHG-free by 2023 for their Light Green service; and

WHEREAS, Marin County is already experiencing and at risk of more frequently experiencing the devastating effects of extreme heat and weather events and flooding caused by climate change, including increased frequency and magnitude of wildfires and associated air pollution, health impacts, utility and transportation service interruptions, economic disruption, property loss, dislocation, housing shortages, food insecurity, school closures, impacts on agricultural production; and increased demand on public sector resources and emergency response capacity; and

WHEREAS, California Health and Safety Code Section 17958.7 provides that before making any local changes or modifications to the California Building Standards Code (CBSC) pursuant to Section 17958.7, the governing body must make an express finding that such modifications or changes are reasonably necessary because of local climatic, geological or topographical conditions, that such findings must be available as a public record, that a copy of the findings together with the modifications or changes expressly marked and identified to which each finding refers, must be filed with the State Building Standards Commission, and that no modification or change shall become effective or operative for any purpose until the findings and the modifications or changes have been filed with the Commission, and that the Commission may reject a modification or change if no finding was submitted; and

WHEREAS, Marin County Board of Supervisors hereby finds that the all-electric construction and green building local modifications to California Green Building Standards Code Chapters 3, 4 and 5, as set forth in this ordinance, are reasonably necessary to address local

climatic, geologic, environmental and/or topographic conditions that affect the health, safety, and welfare of residents as listed below:

- Flooding/Sea Level Rise: Marin's local topographical and environmental conditions insofar as the County of Marin is bordered by sea water on three sides, presenting a direct adverse local impact to potential sea level rise as the result of construction related contributions to climate change. Additionally, many unincorporated communities in Marin contain Federal Emergency Management Agency (FEMA) Special Flood Hazard Areas (SFHA), meaning they have at least a 1% chance of flooding in a given year. Extreme weather conditions resulting from climate change may result in sudden, prolonged rainfall leading to further flooding events.

  The use of electricity rather than natural gas in newly constructed and new construction buildings will reduce greenhouse gas emissions contributing to the effects of global warming, including extreme weather conditions that can lead to flooding and sea level rise. Increased flooding and sea level rise in both severity and frequency has been scientifically linked to global warming. Accordingly, local amendments to the municipal code establishing electrification requirements for newly constructed and new construction buildings pursuant to this ordinance are reasonably necessary to achieve greenhouse gas emission reductions that avoids heightened risks of climate shocks existing in the county such as sea level rise and flooding caused by global warming.

- Wildfire Risk: Approximately 60,000 acres or 18 percent of the County's land area falls within the Wildland Urban Interface (WUI), which is an area where urban development meets undeveloped lands at risk of wildfires and where residences and other structures are adjacent to or intermixed with open space and wildland vegetation. Fire hazard severity zones (FHSZ) are CAL FIRE-designated areas of significant fire hazard that influence how people construct buildings and protect property to reduce risk associated with wildland fires. A CAL FIRE countywide assessment of wildland fire threat revealed that approximately 82 percent of the total land area of the County is ranked as having moderate to very high fire hazard severity zone ratings. Historical records show that many large wildfires (greater than 500 acres) have occurred in Marin since 1850. CAL FIRE incident information identifies eight wildfires in the County since 2008.

- Local amendments to the municipal code establishing electrification requirements for newly constructed and new construction buildings pursuant to this ordinance are reasonably necessary to achieve greenhouse gas emission reductions that reduces the risks of climate shocks existing in the county such as wildfires and drought, which will then reduce risks of physical damage to critical infrastructure, property loss, and loss of life in FHSZ designated by CAL FIRE. The use of electricity rather than natural gas in newly constructed and new construction buildings will reduce greenhouse gas emissions contributing to the effects of global warming. Increased wildfire risk in both severity and frequency has been scientifically linked to global warming.

- Seismic Risk: The San Andreas Fault was the source of the magnitude of 7.8 earthquake in 1906. Marin was sparsely inhabited at that time and experienced relatively moderate property loss and two deaths. In 1989, the 7.1-magnitude Loma Prieta earthquake occurred on the San

Andreas Fault and was the largest earthquake to occur in the San Francisco Bay Area since 1906. If the fault rupture location were closer, a strong shaking such as this could have caused severe damage within Marin County.

The elimination of natural gas appliances in newly constructed and new construction buildings would reduce the hazards associated with gas leaks during seismic events and establish criteria for rebuilding of damaged properties following a local seismic emergency. Accordingly, local amendments to the municipal code establishing electrification requirements for newly constructed and new construction buildings pursuant to this ordinance are reasonably necessary to achieve greenhouse gas emission reductions that avoids risks existing in the county such as from gas leaks and fires caused by vibration and ground failure risks from seismic conditions.

WHEREAS, the Marin County Board of Supervisors now desires to adopt further local amendments to the 2022 CBSC, including green building standards, that are reasonably necessary because of local climatic, topographic, and geologic conditions in accordance with findings included in this ordinance in accordance with the requirements of Health & Safety Code Section 17958.7, which findings are a public record; and

WHEREAS, the Marin County Community Development Agency is the designated enforcement authority for this Title, and with the Ordinance proposed herein is expressly initiating local amendments, additions, or deletions to the California Building Standards Code; and

WHEREAS, the Public Resources Code Section 25402.1(h)(2) states that a local enforcement agency may adopt more restrictive energy standards when they are cost-effective and approved by the California Energy Commission; and

WHEREAS, the Board of Supervisors hereby determines that the revised energy standards contained herein are cost effective, based upon the findings of studies conducted by Frontier Energy, Inc., Misti Bruceri & Associates LLC, and TRC Energy Services.

WHEREAS, nothing in this ordinance is intended to amend or conflict with any provisions of the National Appliance Energy Conservation Act of 1975 or to impose requirements to use or install any particular appliance or appliance system; and

WHEREAS, green building benefits are spread throughout the systems and features of the building. Green buildings can include, among other things, the use of certified sustainable wood products, extensive use of high-recycled-content products; orientation and design of a building to reduce the demand on the heating, ventilating, and air conditioning systems; the use of heating, ventilating, and air conditioning systems that provide energy efficiency and improved air quality; enhancement of indoor air quality by selection and use of construction materials that do not emit chemicals that are toxic or irritating to building occupants; the use of water conserving methods and equipment; and installation of alternative energy methods for supplemental energy production; and

WHEREAS, the cement industry has improved its technology and will soon distribute Portland Lime Cement, a binding material that is estimated to reduce GHG emissions 10% compared to the industry standard, Portland Cement (ASTM C150); and

NOW, THEREFORE, BE IT RESOLVED, that the Board of Supervisors of the County of Marin ordains as follows: Subchapter 2 of Marin County Code Chapter 19.04 (Green Building Requirements) is repealed and replaced, and Chapter 19.07 is amended to read as follows:

SECTION II: SUBCHAPTER 2 OF MARIN COUNTY CODE CHAPTER 19.04 REPEALED AND REPLACED

Subchapter 2 – All-electric and Green Building Requirements

19.04.110 Purpose.

The purpose of this chapter is to meet or exceed all applicable mandatory measures of the 2022 California Green Building Standards Code (Title 24, Part 11) and 2022 California Energy Code (Title 24, Part 6) of the California Code of Regulations. Pursuant to Health and Safety Code Sections 17958.7 and 18941.5, the Marin County Board of Supervisors hereby finds the following all-electric construction and green building modifications to California Green Building Standards Code Chapters 3, 4 and 5, as set forth in this subchapter, are reasonably necessary to address local climatic, geologic, environmental and/or topographic conditions that affect the health, safety, and welfare of residents, including flooding/sea level rise, wildfire risk, and seismic risk.

The green building provisions referenced in this chapter are designed to achieve the following objectives in Marin County:

(1) Increase energy efficiency in buildings;

(2) Reduce consumption of fossil fuels;

(3) Encourage water and resource conservation;

(4) Reduce waste generated by construction projects;

(5) Reduce long-term building operating and maintenance costs;

(6) Improve indoor air quality and occupant health;

(7) Contribute to meeting state and local commitments to reduce greenhouse gas emissions;

(8) Satisfy all applicable mandatory measures of the 2022 California Green Building Standards Code (Title 24, Part 11) of the California Code of Regulations. 19.04.115 Applicability.

The provisions of this chapter shall apply to all construction or development projects defined below as a "covered project."

19.04.120 Definitions.

For the purposes of interpreting this chapter and the associated standards for compliance, the following terms are defined as follows. When the definitions below differ from those contained elsewhere in this title, the provisions of this chapter shall apply. These definitions are

additional to those outlined in Chapter 2 of the California Green Building Standards Code, Title 24, Part 11.

(1) "2022 California Energy Code" refers to the requirements outlined in the 2022 edition of the California Energy Code known as California Code of Regulations, Part 6 of Title 24.

(2) "All-electric Building" or “All-electric Design” means a building or plans for a building that uses a permanent supply of electricity as the source of energy for all space heating (including but not limited to fireplaces), water heating (including but not limited to pools and spas), cooking appliances (including but not limited to barbeques), and clothes drying appliances, and has no natural gas or propane plumbing installed in the building or within the property lines. An all-electric building may also include solar thermal collectors.

(3) “Accessory Dwelling Unit (ADU)” means a residential unit that meets the definition of an accessory dwelling unit as outlined in §22.130.030 in the County of Marin Article VIII - Development Code Definition. This states that “a residential dwelling unit, which is accessory to a primary dwelling unit, that provides complete independent living facilities for one or more persons and is located on a lot with a proposed or existing primary dwelling. It shall provide permanent provisions for living, sleeping, eating, cooking, sanitation, and independent exterior access, on the same lot as the single-family or multi-family dwelling is or will be situated. An Accessory Dwelling Unit also includes the following: (1) an efficiency unit as defined in section 17958.1 of the California Health and Safety Code and (2) a manufactured home as defined in section 18007 of the California Health and Safety Code.” For purposes of this subchapter, ADU also covers Junior ADUs and detached or attached ADUs.

(4) “Automatic Load Management System (ALMS)” means a control system designed to manage load across one or more electric vehicle supply equipment (EVSE), circuits, panels, and to share electrical capacity and/or automatically manage power at each connection point. ALMS systems shall be designed to deliver no less than 3.3 kVa (208/240 volt, 16-ampere) to each EV Capable, EV Ready or EVCS space served by the ALMS, and meet the requirements of California Electrical Code Article 625. The connected amperage to the building site for the EV charging infrastructure shall not be lower than the required connected amperage per California Green Building Standards Code, Title 24 Part 11.

(5) "CALGreen" refers to the California Green Building Standards Code, as included in Title 24, Part 11 of the California Code of Regulations.

(6) "CALGreen mandatory" means those measures that are required under Title 24, Part 11. Residential mandatory measures are contained in CALGreen Chapter 4. Nonresidential mandatory measures are contained in CALGreen Chapter 5.

(7) "CALGreen Tier 1" refers to required pre-requisite and elective measures in addition to the CALGreen mandatory measures, as outlined in CALGreen Appendix A4.601.4 for residential projects and CALGreen Appendix A5.601.2 for nonresidential projects.

(8) “Commercial Kitchen” means non-retail food facility devoted to the commercial preparation, production, and cooking of food and beverages for on-site or off-site consumption.

(9) “Cooking Equipment” means equipment intended for commercial use, including ovens, ranges, and cooking appliances for use in a commercial kitchen and restaurant where food is dispensed.

(10) "Covered Project(s)" means a development project provided below as set forth by the standards for compliance outlined in §19.04.140, Table 1, 2, or 3 for which one or more building permits are required:

(i) All residential and nonresidential newly constructed and new construction buildings as defined below in §19.04.120(27) and (28), respectively; and/or

(ii) Additions or alterations to an existing Single-Family residential building, except for any projects less than 750 square feet.

(11) “Direct Current Fast Charging (DCFC)” means a parking space provided with electrical infrastructure that meets the following conditions:

(i) A minimum of 48 kVa (480 volt, 100-ampere) capacity wiring.

(ii) Electric vehicle supply equipment (EVSE) located within three (3) feet of the parking space providing a minimum capacity of 80-ampere.

(12) "Electric Vehicle (EV) Capable Space" means a vehicle space with electrical panel space and load capacity to support a branch circuit and necessary raceways, both underground and/or surface mounted, to support EV charging.

(13) "Electric Vehicle (EV) Ready Space" means a vehicle space which is provided with a branch circuit; any necessary raceways, both underground and/or surface mounted, to support EV charging, terminating in a receptacle or a charger.

(14) “Electric Vehicle Charging Space (EV Space)” means a space intended for future installation of EV charging equipment and charging of electric vehicles.

(15) “Electric Vehicle Charging Station (EVCS)” means a parking space that includes installation of electric vehicle supply equipment (EVSE) at an EV Ready space. An EVCS space may be used to satisfy EV Ready space requirements. EVSE shall be installed in accordance with the California Electrical Code, Article 625.

(16) “Level 1 (L1) EV Ready” means a parking space that is served by a complete electric circuit with the following requirements:

(i) A minimum of 2.2 kVa (110/120 volt, 20-ampere) capacity wiring.

(ii) A receptacle labeled “Electric Vehicle Outlet” or electric vehicle supply equipment located within three (3) feet of the parking space. If EVSE is provided the minimum capacity of the EVSE shall be 16-ampere.

(iii) Conduit oversized to accommodate future Level 2 EV Ready (208/240 volt, 40-ampere) at each parking space.

(17) “Level 2 (L2) EV Ready” means a parking space that is served by a complete electric circuit with the following requirements:

(i) A minimum of 8.3 kVa (208/240 volt, 40-ampere) capacity wiring.

(ii) A receptacle labeled “Electric Vehicle Outlet” or electric vehicle supply equipment located within three (3) feet of the parking space. If EVSE is provided the minimum capacity of the EVSE shall be 30-ampere.

(18) “Electric Vehicle Supply Equipment (EVSE)” means the conductors, including the undergrounded, grounded and equipment grounding conductors and the electric vehicle connectors, attachment plugs, and all other fittings, devices, power outlets or apparatus installed for the purpose of transferring energy between the premises wiring and the electric vehicle.

(19) “Essential Services Building” means a facility as defined by the California Health and Safety Code section 16007, as amended from time to time. For purposes of this chapter, essential services buildings are publicly owned and/or publicly operated buildings whose purpose is to safeguard the public health and safety. Essential services buildings generally exclude privately owned residences and/or commercial buildings; except that, privately owned commercial buildings may qualify as essential services buildings to the extent they are publicly operated to safeguard the public health and safety.

(20) “Food Service Establishment” means any newly constructed or new construction building with construction plans for a commercial kitchen or cooking equipment.

(21) “Industrial process heat” shall be defined as a process or manufacturing equipment for which sustained temperatures typically in excess of three hundred fifty degrees Fahrenheit are required and demonstrably not achievable with commercial electric equipment.

(22) “Low Power Level 2 Electric Vehicle Charging Receptacle” means a parking space that is served by a complete electric circuit with the following requirements:

(i) A minimum of 4.1 kVA (208/240 Volt, 20-ampere) capacity wiring.

(ii) A receptacle labeled “Electric Vehicle Outlet” or electric vehicle supply equipment located within three (3) feet of the parking space. If EVSE is provided the minimum capacity of the EVSE shall be 16-ampere.

(iii) Conduit oversized to accommodate future Level 2 EV Ready (208/240 volt, 40-ampere) at each parking space.

(23) “Mixed-fuel” means a building or unit in a building that is plumbed for the use of natural gas or propane as fuel for space heating, water heating, cooking or clothes drying appliances or has gas plumbing within a building or within the property lines of the premises connected to a gas meter or propane tank.

(24) "Modified parking lot" shall be those for which paving material and curbing is removed.

(25) “Natural gas” is the same meaning as "Fuel Gas" as defined in the California Plumbing Code and Mechanical Code.

(26) “Natural gas infrastructure” means fuel gas piping, other than service pipe, in or in connection with a building, structure or within the property lines of premises, extending from the point of delivery at the meter, service meter assembly, outlet of the service regulator, service shutoff valve, or final pressure regulator, whichever is applicable, as specified in the California Mechanical Code and Plumbing Code.

(27) “New Construction” means a building that meets the definition of a demolition as outlined in §22.130.030 in the County of Marin Article VIII - Development Code Definition. This states that "for buildings, removal or substantial modification of more than seventy-five percent of the linear sum of a building's exterior walls for each

story shall be considered demolition of the building." Any existing building that is demolished to this level will be required to comply with the requirements for all-electric construction in newly constructed and new construction buildings outlined in §19.04.125.

(28) “Newly Constructed” means a building that has never before been used or occupied for any purpose.

(29) "Qualified green building rater" means an individual who has been trained and certified as a CALGreen inspector, LEED AP w/a specialty, GreenPoint rater, PHIUS consultant, or has similar qualifications and certifications if acceptable to the chief building official.

(30) “Single-Family” means a building designed for and/or occupied exclusively by one family. It is used herein to describe one and two-family dwellings and townhouses with attached private garages. It also includes factory-built, modular housing units, constructed in compliance with the California Building Code (CBC), and mobile homes/manufactured housing on permanent foundations and agricultural worker housing.

19.04.125 Requirements for all-electric construction in newly constructed and new construction buildings

(a) Newly Constructed Buildings and buildings defined as New Construction in §22.130.030 of the County of Marin Article VIII - Development Code must satisfy the definition of an all-electric building and/or design, except as otherwise described below:

(i) Emergency electrical generation back-up power equipment for essential services and multifamily buildings;

(ii) The use of portable propane appliances outside of the building envelope, such as for outdoor cooking, refrigeration, and outdoor heating appliances;

(iii) The use of natural gas infrastructure for equipment requiring industrial process heat;

(iv) Development projects that have obtained vested rights prior to the effective date of this chapter pursuant to:

(a) A preliminary affordable housing project application in accordance with Government Code Section 65589.5(o),

(b) A development agreement in accordance with Government Code Section 65866,

(c) A vesting tentative map in accordance with Government Code 66998.1, or

(d) The ruling in Avco Community Developers Inc. v. South Coast Regional Communication (1976) 17 Cal. 3d 785, or pursuant to other applicable statutory or case law.

(v) Food service establishments as defined in §19.04.120(20) and described in §19.04.180.

(vi) New ADUs and JADUs that are attached or wholly within an existing mixed-fuel residential building may utilize existing natural gas facilities.

(b) Requirements are outlined by project type and size in §19.04.140, Table 1

(c) This subchapter shall in no way amend the 2022 California Energy Code, Title 24 part 6, nor require the use or installation of any specific appliance or system.

(d) Applicants are ineligible to apply for and the building official may not grant permits that would convert an all-electric building to a mixed-fuel building where the application was submitted on or after the effective date of this chapter.

(e) To the extent that natural gas infrastructure is permitted, it shall only be permitted to extend to a system, device, or appliance within a building for which an equivalent all-electric design as defined in §19.04.120(2), Marin County Code, is not available.

(f) Newly constructed and New Construction buildings shall nonetheless be required at a minimum to have sufficient electric capacity, wiring, and conduit to facilitate future full building electrification.

(g) The requirements of this subchapter shall be deemed objective planning standards under Cal. Gov't Code section 65913.4 and objective development standards under Cal. Gov't Code section 65589.5

19.04.130 Requirements for additions and alterations - Local amendments to 2022 California Energy Code.

Pursuant to §19.04.010(6), the county has adopted the 2022 edition of the California Energy Code known as California Code of Regulations, Part 6 of Title 24 with additions, and deletions as provided in this subchapter.

The provisions of this subchapter shall constitute local amendments to the cross-referenced provisions of the 2022 California Energy Code and shall be deemed to replace the cross-referenced sections of said Code with the respective provisions set forth in this subchapter.

The California Energy Code, Title 24, Part 6, is hereby amended as underlined and struck through:

Section 100.0 of Subchapter 1 of the 2022 California Energy Code is modified to add new section (i) as follows:

(i) Single-Family Building Remodel Energy Reach Code - Purpose and Intent. In addition to all requirements of the California Energy Code applicable to Existing Single-Family Building additions and alterations, the energy efficiency and renewable energy measures specified in Section 150.0(w) shall be required for Covered Projects of mixed-fuel buildings.

Section 100.1(b) is modified by adding the following definitions:

"All-electric Building" or "All-electric Design" as defined in §19.04.120(2), Marin County Code.

"Covered Project(s)" as defined in §19.04.120(10), Marin County Code.

"Mixed-fuel" building as defined in §19.04.120(23), Marin County Code.

Section 150.0 SINGLE-FAMILY RESIDENTIAL BUILDINGS – MANDATORY FEATURES AND DEVICES, first two paragraphs, are modified to read as follows:

Existing Single-Family residential buildings shall comply with the applicable requirements of Sections 150(a) through 150.0(v), and Covered Existing Single-Family Projects, other than

projects identified as all-electric construction for newly constructed or new construction buildings in §19.04.125, Marin County Code, shall comply with the applicable requirements of Section 150.0(w).

NOTE: The requirements of Sections 150.0(a) through 150.0(v) apply to newly constructed buildings. Sections 150.2(a) and 150.2(b) specify which requirements of Sections 150.0(a) through 150.0(v) also apply to additions or alterations, with the exception that Covered Existing Single-Family Projects, other than projects identified as all-electric construction for newly constructed or new construction buildings in §19.04.125, Marin County Code, shall also be required to comply with Section 150.0(w).

A new Section, (w), is added to Section 150.0 as follows:

(w) Requirements for a Covered Project are outlined by project type in §19.04.140, Table 1, Marin County Code. A Covered Existing Single-Family Project, as defined in §19.04.120(10)(ii), Marin County Code, that includes an electrical panel upgrade, a kitchen remodel or a laundry room remodel shall comply with the requirements for Measure ER2 in §19.04.140, Table 2, Marin County Code, In addition, a Covered Existing Single-Family Project in a building originally permitted for construction on or before December 31, 2010 shall install a set of measures from the Measure Menu in §19.04.140, Table 2, Marin County Code, to achieve a total Measure Point Score that is equal to or greater than the Target Score in said table and shall conform to the List of Measure Specifications in §19.04.140, Table 3, Marin County Code, except as otherwise described below:

(i) Projects identified as all-electric construction for newly constructed or new construction buildings in §19.04.125, Marin County Code.

(ii) Projects less than 750 square feet.

(iii) Projects that are limited solely to a newly created attached Accessory Dwelling Units (ADUs) or Junior Accessory Dwelling Unit (JADU) as defined in §19.04.120(3), Marin County Code. A newly created ADU and JADU shall include either additions or conversions of existing space. This exception DOES NOT apply to a Covered Existing Single-Family Project of an existing ADU or JADU.

(iv) Mobile Homes, Manufactured Housing, or Factory-built Housing as defined in Division 13 of the California Health and Safety 12 Code (commencing with section 17000 of the Health and Safety Code).

(v) If due to conditions specific to the project, it is technically or economically infeasible to achieve compliance, the chief building official may reduce the Target Score and/or waive some or all of the mandatory requirements.

(vi) If the applicant demonstrates that the Energy Budget of the proposed building, as calculated under Section 150.1(b), would be less than or equal to the Energy Budget of the building if it otherwise complied with this Section, 150.0(w).

(vii) A resident owner or occupant demonstrates that they qualify for the California Alternative Rates for Energy (CARE), or Family Electric Rate Assistance (FERA) program may comply by installing, to the specifications in §19.04.140 Table 3, Marin County Code, the following:

(a) E1: Lighting Measures; and

(b) E2: Water Heating Package

In addition, all mandatory measures listed in §19.04.140, Table 2, Marin County Code, shall be installed.

Measure verification shall be explicitly included as an addendum to the Certificate of Compliance to be filed pursuant to 2022 Title 24 Section 10-103.

19.04.135 Requirements for Electric Vehicle Infrastructure - Local amendments to 2022 CALGreen California Green Building Standards Code.

Pursuant to §19.04.010(9), the county has adopted the 2022 edition of the California Green Building Standards Code known as California Code of Regulations, Part 11 of Title 24 (herein referred to as CALGreen Code), including Division A4.6 for Tier 1 with additions, and deletions as provided in this subchapter. Requirements are outlined by project type in Table 1 of Chapter 19.04.140, Marin County Code.

The provisions of this subchapter shall constitute local amendments to the cross-referenced provisions of the 2022 CALGreen Code and shall be deemed to replace the cross-referenced sections of said Code with the respective provisions set forth in this subchapter.

Section 202 of Chapter 2 of the 2022 CALGreen Code is hereby amended as underlined and struck through:

Automatic Load Management System (ALMS). A control system designed to manage load across one or more electric vehicle supply equipment (EVSE), circuits, panels and to share electrical capacity and/or automatically manage power at each connection point. ALMS systems shall be designed to deliver no less than 3.3 kVa (208/240 volt, 16-ampere) to each EV Capable, EV Ready or EVCS space served by the ALMS, and meet the requirements of California Electrical Code Article 625. The connected amperage to the building site for the EV charging infrastructure shall not be lower than the required connected amperage per California Green Building Standards Code, Title 24 Part 11.

Direct Current Fast Charging (DCFC). A parking space provided with electrical infrastructure that meets the following conditions:

i. A minimum of 48 kVa (480 volt, 100-ampere) capacity wiring.

ii. Electric vehicle supply equipment (EVSE) located within three (3) feet of the parking space providing a minimum capacity of 80-ampere.

Electric Vehicle Charging Station (EVCS). ~~One or more electric vehicle charging spaces served by electric vehicle charger(s) or other charging equipment allowing charging of electric vehicles. Electric vehicle charging stations are not considered parking spaces~~. A parking space that includes installation of electric vehicle supply equipment (EVSE) at an EV Ready space. An EVCS space may be used to satisfy EV Ready space requirements. EVSE shall be installed in accordance with the California Electrical Code, Article 625.

Electric Vehicle (EV) Ready Space. [HCD] A vehicle space which is provided with a branch circuit; any necessary raceways, both underground and/or surface mounted; to accommodate EV charging, terminating in a receptacle or a charger.

Electric Vehicle (EV) Capable Space. A vehicle space with electrical panel space and load capacity to support a branch circuit and necessary raceways, both underground and/or surface mounted, to support EV charging.

Level 2 (L2) EV Capable. A parking space provided with electrical infrastructure that meets the following requirements:

i. Conduit that links a listed electrical panel with sufficient capacity to a junction box or receptacle located within three (3) feet of the parking space.
ii. The conduit shall be designed to accommodate at least 8.3 kVa (208/240 volt, 40-ampere) per parking space. Conduit shall have a minimum nominal trade size of 1 inch inside diameter and may be sized for multiple circuits as allowed by the California Electrical Code. Conduit shall be installed at a minimum in spaces that will be inaccessible after construction, either trenched underground or where penetrations to walls, floors, or other partitions would otherwise be required for future installation of branch circuits, and such additional elements deemed necessary by the Building Official. Construction documents shall indicate future completion of conduit from the panel to the parking space, via the installed inaccessible conduit.
iii. The electrical panel shall reserve a space for a 40-ampere overcurrent protective device space(s) for EV charging, labeled in the panel directory as “EV CAPABLE.”
iv. Electrical load calculations shall demonstrate that the electrical panel service capacity and electrical system, including any on-site distribution transformer(s), have sufficient capacity to simultaneously charge all EVs at all required EV spaces at a minimum of 40 amperes.
v. The parking space shall contain signage with at least a 12” font adjacent to the parking space indicating the space is EV Capable.

Level 1 (L1) EV Ready. A parking space that is served by a complete electric circuit with the following requirements:

i. A minimum of 2.2 kVa (110/120 volt, 20-ampere) capacity wiring.
ii. A receptacle labeled “Electric Vehicle Outlet” or electric vehicle supply equipment located within three (3) feet of the parking space. If EVSE is provided the minimum capacity of the EVSE shall be 16-ampere.
iii. Conduit oversized to accommodate future Level 2 EV Ready (208/240 volt, 40-ampere) at each parking space.

Level 2 (L2) EV Ready. A parking space that is served by a complete electric circuit with the following requirements:

i. A minimum of 8.3 kVa (208/240 volt, 40-ampere) capacity wiring.
ii. A receptacle labeled “Electric Vehicle Outlet”, or electric vehicle supply equipment located within three (3) feet of the parking space. If EVSE is provided the minimum capacity of the EVSE shall be 30-ampere.

Low Power Level 2 (L2) EV Ready. A parking space that is served by a complete electric circuit with the following requirements:

i. A minimum of 4.1 kVA (208/240 Volt, 20-ampere) capacity wiring.

ii. A receptacle labeled “Electric Vehicle Outlet”, or electric vehicle supply equipment located within three (3) feet of the parking space. If EVSE is provided the minimum capacity of the EVSE shall be 16-ampere.

iii. Conduit oversized to accommodate future Level 2 EV Ready (208/240 volt, 40-ampere) at each parking space.

~~*Low Power Level 2 Electric Vehicle (EV) Charging Receptacle*. [HCD] A 208/240 Volt 20-ampere minimum branch circuit and a receptacle for use by an EV driver to charge their electric vehicle or hybrid electric vehicle.~~

Off-Street Loading Spaces. [BSC-CG, DSA-SS] An area, other than a public street, public way, or other property (and exclusive of off-street parking spaces), permanently reserved or set aside for the loading or unloading of motor vehicles, including ways of ingress and egress and maneuvering areas. Whenever the term "loading space" is used, it shall, unless the context clearly requires otherwise, be construed as meaning off-street loading space. This excludes designated passenger loading/unloading.

Section 301.1 of Chapter 3 of the 2022 CALGreen Code is hereby amended as underlined and struck through:

301.1 Scope. Buildings shall be designed to comply with applicable requirements of Marin County Green Building Requirements beginning at Chapter 19.04.110, Marin County Code, and shall also include the green building measures specified as mandatory in the application checklists contained in this code. ~~Voluntary green building measures are also included in the application checklists and may be included in the design and construction of structures covered by this code, but are not required unless adopted by a city, county, or city and county as specified in Section 101.7.~~

Section 301.1.1 of Chapter 3 of the 2022 CALGreen Code is hereby amended as underlined and struck through:

301.1.1 Additions and alterations. [HCD] The mandatory provisions of Chapter 4 shall be applied to additions and alterations of existing residential buildings ~~where the addition or alteration increases the building’s conditioned area, volume, or size.~~, in accordance with applicable requirements of Marin County Green Building Requirements beginning at Chapter 19.04.110, Marin County Code. The requirements shall apply only to and/or within the specific area of the addition or alteration.

The mandatory provisions of section 4.106.4.1.1~~2~~ may apply to additions or alterations of existing parking facilities or the addition of new parking facilities or the addition of new parking facilities serving existing multifamily buildings. See Section 4.106.4.1.2~~3~~ for application.

NOTE: Repairs including, but not limited to, resurfacing, restriping, and repairing or maintaining existing lighting fixtures are not considered alterations for the purpose of this section.

Section 301.3 of Chapter 3 of the 2022 CALGreen Code is hereby amended as underlined and struck through:

301.3 Nonresidential additions and alterations. [BSC-CG] The provisions of individual sections of Chapter 5 apply to newly constructed buildings and building additions and alterations ~~of 1,000 square feet or greater, and/or building alterations with a permit valuation of $200,000 or above~~ (for occupancies within the authority of California Building

standards Commission). Code sections relative to additions and alterations shall only apply to the portions of the building being added or altered within the scope of the permitted work.

Section 4.106.4 of Chapter 4 of the 2022 CALGreen Code is hereby amended as underlined and struck through:

4.106.4 Electric vehicle (EV) charging ~~for new construction~~. ~~New~~ Residential construction shall comply with Section 4.106.4.1 or 4.106.4.2 to facilitate future installation and use of EV chargers. Electric vehicle supply equipment (EVSE) shall be installed in accordance with the *California Electrical Code*, Article 625. For EVCS signs, refer to Caltrans Traffic Operations Policy Directive 13-01 (Zero Emission Vehicle Signs and Pavement Markings) or its successor(s). Calculation for spaces shall be rounded up to the nearest whole number.

Exceptions:

1. On a case-by-case basis, where the local enforcing agency has determined EV charging and infrastructure are not feasible based upon one or more of the following conditions:
   1.1. Where there is no local utility power supply, or the local utility is unable to supply adequate power.
   1.2. Where there is evidence suitable to the local enforcing agency substantiating that additional local utility infrastructure design requirements, directly related to the implementation of Section 4.106.4, may adversely impact the construction cost of the project.
2. Accessory Dwelling Units (ADU) and Junior Accessory Dwelling Units (JADU) without additional parking facilities and without electrical panel upgrade or new panel installation. Detached ADUs, attached ADUs, and JADUs without additional parking but with electrical panel upgrades or new panels must have reserved breakers and electrical capacity according to the requirements of A4.106.8.1.
3. Multifamily building projects that have approved entitlements before the code effective date.
4. Parking spaces accessible only by automated mechanical car parking systems are not required to comply with this code section.

~~**4.106.4.1 New one- and two-family dwellings and townhouses with private garages**. For each dwelling unit, install a listed raceway to accommodate a dedicated 208-240-volt branch circuit. The raceway shall not be less than trade size 1 (nominal 1-inch inside diameter). The raceway shall originate at the main service or subpanel and shall terminate into a listed cabinet, box, or other enclosure in close proximity to the proposed location of an EV charger. Raceways are required to be continuous at enclosed, inaccessible, or concealed areas and spaces. The service panel and/or subpanel shall provide capacity to install a 40-ampere 208/240-volt minimum dedicated branch circuit and space(s) reserved to permit installation of a branch circuit overcurrent protective device.~~

~~**Exception**: A raceway is not required if a minimum 40-ampere 208/240-volt dedicated EV branch circuit is installed in close proximity to the proposed location of~~

~~an EV charger at the time of original construction in accordance with the *California Electrical Code*.~~

~~**4.106.4.1.1 Identification**. The service panel or subpanel circuit directory shall identify the overcurrent protective device space(s) reserved for future EV charging as "EV CAPABLE". The raceway termination location shall be permanently and visibly marked as "EV CAPABLE".~~

4.106.4.1~~2 New m~~ultifamily dwellings~~, hotels, and motels and~~ with ~~new~~ parking facilities. Requirements apply to parking spaces that are assigned or leased to individual dwelling units, as well as unassigned residential parking. Visitor or common area parking is not included.

4.106.4.1.1 New Construction. Fifteen percent (15%) of dwelling units with parking spaces shall be EVCS with Level 2 EV Ready. ALMS shall be permitted to reduce load when multiple vehicles are charging. Eighty-five percent (85%) of dwelling units with parking spaces shall be provided with a Low Power Level 2 EV Ready space. EV ready spaces and EVCS in multifamily developments shall comply with California Building Code, Chapter 11A, Section 1109A. EVCS shall comply with the accessibility provisions for EV chargers in the California Building Code, Chapter 11B.

NOTE: The total number of EV spaces should be one hundred percent (100%) of dwelling units or one hundred percent (100%) of parking spaces, whichever is less.

4.106.4.1.2 Additions and alterations of existing buildings.

1. When parking facilities upgrade the service panel or parking lot surface is modified, including the removal of paving material and curbing, comply with the number of spaces designated for the project type as outlined in Table 1 of Chapter 19.04.110, Marin County Code. Upgrades shall be required at currently designated vehicle parking spaces. Upgrades shall be required for remaining parking spaces after meeting the accessibility requirements of California Building Code Chapters 11A and 11B.

2. When new parking facilities are added and ALMS is installed, the ALMS system must be designed to deliver no less than 2.2 kVa (110/120 volt, 20-ampere).

4.106.4.2 Hotel and Motel Occupancies – Shared Parking Facilities.

4.106.4.2.1 New Construction. Ten percent (10%) of parking spaces provided shall be EVCS with Level 2 EV Ready. ALMS shall be permitted to reduce load when multiple vehicles are charging. Thirty-five percent (35%) of parking spaces provided shall be Low Power Level 2 EV Ready space. Ten percent (10%) of parking spaces provided shall be Level 2 EV Capable.

4.106.4.2.2 Additions and Alterations of Existing Buildings.

1. When parking facilities upgrade the service panel or parking lot surface is modified, including the removal of paving material and curbing, comply with the number of spaces designated for the project type as outlined in Table 1 of Chapter 19.04.110, Marin County Code. Upgrades shall be required at currently designated vehicle parking spaces. Upgrades shall be required for remaining parking spaces after meeting the accessibility requirements of California Building Code Chapters 11A and 11B.

2. When new parking facilities are added and ALMS is installed, the ALMS system must be designed to deliver no less than 2.2 kVa (110/120 volt, 20-ampere).

~~When parking is provided, parking spaces for new multifamily dwellings, hotels and motels shall meet the requirements of Sections 4.106.4.2.1 and 4.106.4.2.2. Calculations for spaces shall be rounded up to the nearest whole number. A parking space served by electric vehicle supply equipment or designed as a future EV charging space shall count as at least one standard automobile parking space only for the purpose of complying with any applicable minimum parking space requirements established by a local jurisdiction. See Vehicle Code Section 22511.2 for further details.~~

~~4.106.4.2.1 Multifamily development projects with less than 20 dwelling units; and hotels and motels with less than 20 sleeping units or guest rooms.~~

~~The number of dwelling units, sleeping units or guest rooms shall be based on all buildings on a project site subject to this section.~~

~~1. **EV Capable.** Ten (10) percent of the total number of parking spaces on a building site, provided for all types of parking facilities, shall be electric vehicle charging spaces (EV spaces) capable of supporting future Level 2 EVSE. Electrical load calculations shall demonstrate that the electrical panel service capacity and electrical system, including any on-site distribution transformer(s), have sufficient capacity to simultaneously charge all EVs at all required EV spaces at a minimum of 40 amperes.~~

~~The service panel or subpanel circuit directory shall identify the overcurrent protective device space(s) reserved for future EV charging purposes as "EV CAPABLE" in accordance with the *California Electrical Code*.~~

~~**Exceptions:**~~

~~1. When EV chargers (Level 2 EVSE) are installed in a number equal to or greater than the required number of EV capable spaces.~~

~~2. When EV chargers (Level 2 EVSE) are installed in a number less than the required number of EV capable spaces, the number of EV capable spaces required may be reduced by a number equal to the number of EV chargers installed.~~

Notes:

a. Construction documents are intended to demonstrate the project's capability and capacity for facilitating future EV charging.

b. There is no requirement for EV spaces to be constructed or available until receptacles for EV charging or EV chargers are installed for use.

2. **EV Ready.** Twenty-five (25) percent of the total number of parking spaces shall be equipped with low power Level 2 EV charging receptacles. For multifamily parking facilities, no more than one receptacle is required per dwelling unit when more than one parking space is provided for use by a single dwelling unit.

Exception: Areas of parking facilities served by parking lifts.

4.106.4.2.2 Multifamily development projects with 20 or more dwelling units, hotels, and motels with 20 or more sleeping units or guest rooms.

The number of dwelling units, sleeping units or guest rooms shall be based on all buildings on a project site subject to this section.

a. **EV Capable**. Ten (10) percent of the total number of parking spaces on a building site, provided for all types of parking facilities, shall be electric vehicle charging spaces (EV spaces) capable of supporting future Level 2 EVSE. Electrical load calculations shall demonstrate that the electrical panel service capacity and electrical system, including any on-site distribution transformer(s), have sufficient capacity to simultaneously charge all EVs at all required EV spaces at a minimum of 40 amperes.

The service panel or subpanel circuit directory shall identify the overcurrent protective device space(s) reserved for future EV charging purposes as "EV CAPABLE" in accordance with the *California Electrical Code*.

Exception: When EV chargers (Level 2 EVSE) are installed in a number greater than five (5) percent of parking spaces required by Section 4.106.4.2.2, Item 3, the number of EV capable spaces required may be reduced by a number equal to the number of EV chargers installed over the five (5) percent required.

Notes:

a. Construction documents are intended to demonstrate the project's capability and capacity for facilitating future EV charging.

b. There is no requirement for EV spaces to be constructed or available until receptacles for EV charging or EV chargers are installed for use.

b. **EV Ready.** Twenty-five (25) percent of the total number of parking spaces shall be equipped with low power Level 2 EV charging receptacles. For multifamily parking facilities, no more than one receptacle is required per dwelling unit when more than one parking space is provided for use by a single dwelling unit.

Exception: Areas of parking facilities served by parking lifts.

~~c. **EV Chargers.** Five (5) percent of the total number of parking spaces shall be equipped with Level 2 EVSE. Where common use parking is provided, at least one EV charger shall be located in the common use parking area and shall be available for use by all residents or guests.~~

~~When low power Level 2 EV charging receptacles or Level 2 EVSE are installed beyond the minimum required, an automatic load management system (ALMS) may be used to reduce the maximum required electrical capacity to each space served by the ALMS. The electrical system and any on-site distribution transformers shall have sufficient capacity to deliver at least 3.3 kW simultaneously to each EV charging station (EVCS) served by the ALMS. The branch circuit shall have a minimum capacity of 40 amperes and installed EVSE shall have a capacity of not less than 30 amperes. ALMS shall not be used to reduce the minimum required electrical capacity to the required EV capable spaces.~~

4.106.4.3~~2.2.1~~ Electric vehicle charging stations (EVCS).

Electric vehicle charging stations required by Section 4.106.4.1~~2.2, Item 3~~ and 4.106.4.2, shall comply with Section 4.106.4.3~~2.2.1~~.

Exception: Electric vehicle charging stations serving public accommodations, public housing, motels, and hotels shall not be required to comply with this section. See *California Building Code*, Chapter 11B, for applicable requirements.

4.106.4.3.1~~2.2.1.1~~ Location.

EVCS shall comply with at least one of the following options:

1. The charging space shall be located adjacent to an accessible parking space meeting the requirements of the *California Building Code*, Chapter 11A, to allow use of the EV charger from the accessible parking space.
2. The charging space shall be located on an accessible route, as defined in the *California Building Code*, Chapter 2, to the building.

    Exception: Electric vehicle charging stations designed and constructed in compliance with the *California Building Code*, Chapter 11B, are not required to comply with Section 4.106.4.3.1~~2.2.1.1~~ and Section 4.106.4.3.2~~2.2.1.2~~, Item 3.

4.106.4.3.2~~2.2.1.2 Electric vehicle charging stations (EVCS) d~~ Dimensions.

The charging spaces shall be designed to comply with the following:

1. The minimum length of each EV space shall be 18 feet (5486 mm).
2. The minimum width of each EV space shall be 9 feet (2743 mm).
3. One in every 25 charging spaces, but not less than one, shall also have an 8- foot (2438 mm) wide minimum aisle. A 5-foot (1524 mm) wide minimum aisle shall be permitted provided the minimum width of the EV space is 12 feet (3658 mm).
    a. Surface slope for this EV space and the aisle shall not exceed 1 unit vertical in 48 units horizontal (2.083 percent slope) in any direction.

Exception: Where the County of Marin Municipal or Zoning Code permits parking space dimensions that are less than the minimum requirements stated in this section 4.106.4.3.2, and the compliance with which would be infeasible due to particular circumstances of a project, an exception may be granted while remaining in compliance with California Building Code Section Table 11B-228.3.2.1 and 11B-812, as applicable.

~~**4.106.4.2.2.1.3 Accessible EV spaces**. In addition to the requirements in Sections 4.106.4.2.2.1.1 and 4.106.4.2.2.1.2, all EVSE, when installed, shall comply with the accessibility provisions for EV chargers in the *California Building Code*, Chapter 11B. EV ready spaces and EVCS in multifamily developments shall comply with *California Building Code*, Chapter 11A, Section 1109A.~~

4.106.4.4 Direct current fast charging stations (DCFC). One DCFC may be substituted for up to five (5) EVCS to meet the requirements of 4.106.4.1 and 4.106.4.2. Where ALMS serve DCFC stations, the power demand from the DCFC shall be prioritized above Level 1 and Level 2 spaces.

~~**4.106.4.2.3 EV space requirements**.~~

~~1. Single EV space required. Install a listed raceway capable of accommodating a 208/240-volt dedicated branch circuit. The raceway shall not be less than trade size 1 (nominal 1-inch inside diameter). The raceway shall originate at the main service or subpanel and shall terminate into a listed cabinet, box, or enclosure in close proximity to the location or the proposed location of the EV space. Construction documents shall identify the raceway termination point, receptacle, or charger location, as applicable. The service panel and/or subpanel shall have a 40-ampere minimum dedicated branch circuit, including branch circuit overcurrent protective device installed, or space(s) reserved to permit installation of a branch circuit overcurrent protective device.~~

~~**Exception**: A raceway is not required if a minimum 40-ampere 208/240-volt dedicated EV branch circuit is installed in close proximity to the location or the proposed location of the EV space, at the time of original construction in accordance with the *California Electrical Code*.~~

~~2. Multiple EV spaces required. Construction documents shall indicate the raceway termination point and the location of installed or future EV spaces, receptacles, or EV chargers. Construction documents shall also provide information on amperage of installed or future receptacles or EVSE, raceway method(s), wiring schematics and electrical load calculations. Plan design shall be based upon a 40-ampere minimum branch circuit. Required raceways and related components that are planned to be installed underground, enclosed, inaccessible or in concealed areas and spaces shall be installed at the time of original construction.~~

~~**Exception**: A raceway is not required if a minimum 40-ampere 208/240-volt dedicated EV branch circuit is installed in close proximity to the location or the proposed location of the EV space at the time of original construction in accordance with the *California Electrical Code*.~~

~~**4.106.4.2.4 Identification.**~~

~~The service panel or subpanel circuit directory shall identify the overcurrent protective device space(s) reserved for future EV charging purposes as "EV CAPABLE" in accordance with the *California Electrical Code*.~~

~~4.106.4.2.5 Electric Vehicle Ready Space Signage.~~

~~Electric vehicle ready spaces shall be identified by signage or pavement markings, in compliance with Caltrans Traffic Operations Policy Directive 13-01 (Zero Emission Vehicle Signs and Pavement Markings) or its successor(s).~~

~~4.106.4.3 Electric vehicle charging for additions and alterations of parking facilities serving existing multifamily buildings~~.

~~When new parking facilities are added, or electrical systems or lighting of existing parking facilities are added or altered and the work requires a building permit, ten (10) percent of the total number of parking spaces added or altered, shall be electric vehicle charging spaces (EV spaces) capable of supporting future Level 2 EVSE.~~

~~Notes~~:

1. ~~Construction documents are intended to demonstrate the project's capability and capacity for facilitating future EV charging.~~
2. ~~There is no requirement for EV spaces to be constructed or available until EV chargers are installed for use.~~

Section A4.106.8 of the 2022 CALGreen Code is hereby amended as underlined and struck through:

New construction shall comply with Sections A4.106.8.1, ~~A4.106.8.2 or A4.106.8.3,~~ to facilitate future installation and use of electric vehicle chargers. Electric vehicle supply equipment (EVSE) shall be installed in accordance with the *California Electrical Code*, Article 625.

Section 5.106.5.3 of the 2022 CALGreen Code is hereby amended as underlined and struck through:

5.106.5.3 Electric vehicle (EV) charging.

~~[N]~~ Construction to provide electric vehicle infrastructure and facilitate electric vehicle charging shall comply with Section 5.106.5.3.1 and shall be provided in accordance with regulations in the *California Building Code* and the *California Electrical Code*. Accessible EVCS shall be provided in accordance with the *California Building Code Chapter 11B Section 11B-228.3.* For EVCS signs, refer to Caltrans Traffic Operations Policy Directive 13-01 (Zero Emission Vehicle Signs and Pavement Markings) or its successor(s). Calculation for spaces shall be rounded up to the nearest whole number.

Exceptions:

1. On a case-by-case basis, where the local enforcing agency has determined EV charging and infrastructure are not feasible based upon one or more of the following conditions:
   a. Where there is no local utility power supply
   b. Where the local utility is unable to supply adequate power.

c. Where there is evidence suitable to the local enforcement agency substantiating that additional local utility infrastructure design requirements, directly related to the implementation of Section 5.106.5.3, may adversely impact the construction cost of the project.

2. Parking spaces accessible only by automated mechanical car parking systems are not required to comply with this code section.

Section A5.106.5 of Appendix A5 of the 2022 CALGreen Code is hereby amended as struck through:

~~**A5.106.5.1 Designated parking for clean air vehicles.**~~

~~In new projects or additions or alterations that add 10 or more vehicular parking spaces, provide designated parking for any combination of zero-emitting, fuel-efficient and carpool/van pool vehicles as listed in code Sections A5.106.5.1.1 or A5.106.5.1.2.~~

~~**A5.106.1.1.1 Tier 1.**~~

~~Provide 35 percent designated parking spaces of the total number of parking spaces, for any combination of zero-emitting, fuel-efficient and carpool/van pool vehicles. Calculation for spaces shall be rounded up to the whole number.~~

~~**Note**: Designated parking for clean air vehicles shall count toward the total parking spaces required by the local enforcing agencies.~~

~~**A5.106.1.1.2 Tier 2.**~~

~~Provide 50 percent designated parking spaces of the total number of parking spaces, for any combination of zero-emitting, fuel-efficient and carpool/van pool vehicles. Calculation for spaces shall be rounded up to the whole number.~~

~~**Note**: Designated parking for clean air vehicles shall count toward the total parking spaces required by the local enforcing agencies.~~

~~**A5.06.5.1.3 Parking stall marking**.~~

~~Paint, in the paint for stall striping, the following characters such that the lower edge of the last word aligns with the end of the stall striping and is visible beneath a parked vehicle:~~

~~CLEAN AIR/~~

~~VANPOOL/EV~~

~~**Note**: Vehicles bearing Clean Air Vehicle stickers from expired HOV lane programs may be considered eligible for designated parking spaces.~~

~~**A5.106.5.1.1 Vehicle designations**.~~

~~Building managers may consult with local Transit Management Associations (TMAs) for methods of designating qualifying vehicles, such as issuing parking stickers.~~

~~**Notes:**~~

~~1. Information on qualifying vehicles, car labeling regulations and DMV CAV decals may be obtained from the following sources:~~

~~a. California DriveClean.~~

~~b. California Air Resources Board.~~

~~c. US EPA fuel economy regulations and standards.~~

~~d. DMV Registration Operations.~~

~~2. Purchasing policy and refueling sites for zero-emitting vehicles for state employees use can be found at the Department of General Services.~~

A5.106.5~~.3~~ Electric Vehicle (EV) charging. **~~[N]~~**

Construction shall comply with Section A5.106.5.3.1 or A5.106.5.3.2, and in accordance with regulations in the *California Building Code* and the *California Electrical Code*. Accessible EVCS shall be provided in accordance with the *California Building Code Chapter 11B Section 11B-228.3.* For EVCS signs, refer to Caltrans Traffic Operations Policy Directive 13-01 (Zero Emission Vehicle Signs and Pavement Markings) or its successor(s). Calculation for spaces shall be rounded up to the nearest whole number.

Exceptions:

1. On a case-by-case basis where the local enforcing agency has determined compliance with this section is not feasible based upon one of the following conditions:

   a. Where there is no local utility power supply.

   b. Where the local utility is unable to supply adequate power.

   c. Where there is evidence suitable to the local enforcement agency substantiating that additional local utility infrastructure design requirements, directly related to the implementation of Section A5.106.5, may adversely impact the construction cost of the project.

2. Parking spaces accessible only by automated mechanical car parking systems are not required to comply with this code section.

A5.106.5.3 Nonresidential Occupancies – Shared Parking Facilities.

A5.106.5.3.1 New Construction - Tier 1.

Table A5.106.5.3.1 shall be used to determine the number of EV capable spaces required. Refer to section 5.106.5.3 for design space requirements.

When EV capable spaces are provided with EVSE to create EVCS per Table A5.106.5.3.1.

TABLE A5.106.5.3.1

TOTAL NUMBER OF ACTUAL PARKING SPACES	TIER 1 NUMBER OF REQUIRED EV CAPABLE SPACES	TIER 1 NUMBER OF EVCS (EV CAPABLE SPACES PROVIDED WITH EVSE) [2]
0-9	2	0
10-25	5	0
26-50	11	2
51-75	19	3
76-100	26	4
101-150	38	6
151-200	53	9
201 and over	30 percent of total[1]	25 percent of EV capable spaces [1]

1. Calculation for spaces shall be rounded up to the nearest whole number.

2. The number of required EVCS (EV capable spaces provided with EVSE) in column 3 count toward the total number of required EV capable spaces shown in column 2.

A5.106.5.3.2 Additions and alterations of existing buildings ~~Tier 2~~.

1. When parking facilities upgrade the service panel or parking lot surface is modified, including the removal of paving material and curbing, comply with the number of spaces designated for the project type as outlined in Table 1 of Chapter 19.04.110, Marin County Code**.** Upgrades shall be required at currently designated vehicle parking spaces. Upgrades shall be required for remaining parking spaces after meeting the accessibility requirements of California Building Code Chapters 11A and 11B.
2. When new parking facilities are added and ALMS is installed, the ALMS system must be designed to deliver no less than 2.2 kVa (110/120 volt, 20-ampere).

A5.106.5.4 Direct current fast charging stations. One DCFC may be substituted for up to five (5) EVCS to meet the requirements of 5.106.5.3. Where ALMS serve DCFC stations, the power demand from the DCFC shall be prioritized above Level 1 and Level 2 spaces.

~~Table A5.106.5.3.2 shall be used to determine the number of EV capable spaces required. Refer to section 5.106.5.3 for design space requirements.~~

~~When EV capable spaces are provided with EVSE to create EVCS per Table A5.106.5.3.1, refer to Section 5.106.5.3.2 for the allowed use of Level 2 or Direct~~

~~Current Fast Charger (DCFC) and Section 5.106.5.3.3 for the allowed use of Automatic Load Management Systems (ALMS).~~

~~TABLE A5.106.5.3.2~~

~~TOTAL NUMBER OF ACTUAL PARKING SPACES~~	**~~TIER 2 NUMBER OF REQUIRED EV CAPABLE SPACES~~**	**~~TIER 2 NUMBER OF EVCS (EV CAPABLE SPACES PROVIDED WITH EVSE)~~** [2]
~~0-9~~	~~3~~	~~0~~
~~10-25~~	~~8~~	~~3~~
~~26-50~~	~~17~~	~~6~~
~~51-75~~	~~28~~	~~9~~
~~76-100~~	~~40~~	~~13~~
~~101-150~~	~~57~~	~~19~~
~~151-200~~	~~79~~	~~26~~
~~201 and over~~	~~45 percent of total~~[1]	~~33 percent of EV capable spaces~~ [1]

~~1. Calculation for spaces shall be rounded up to the nearest whole number.~~

~~2. The number of required EVCS (EV capable spaces provided with EVSE) in column 3 count toward the total number of required EV capable spaces shown in column 2.~~

Section 5.106.5.4 of the 2022 CALGreen Code is hereby amended as struck through:

5.106.5.4 Electric vehicle (~~EV~~) charging readiness: medium-duty and heavy-duty. [N]

Construction shall comply with Section 5.106.5.4.1 to facilitate future installation of electric vehicle supply equipment (EVSE). Construction for warehouses, grocery stores and retail stores with planned off-street loading spaces shall also comply with Section 5.106.5.4.1 for future installation of medium- and heavy-duty EVSE. Accessible EVCS shall be provided in accordance with the *California Building Code Chapter 11B Section 11B-228.3.* For EVCS signs, refer to Caltrans Traffic Operations Policy Directive 13-01 (Zero Emission Vehicle Signs and Pavement Markings) or its successor(s).

Exceptions:

1. On a case-by-case basis where the local enforcing agency has determined compliance with this section is not feasible based upon one of the following conditions:

   a. Where there is no local utility power supply.

b. Where the local utility is unable to supply adequate power.

c. Where there is evidence suitable to the local enforcing agency substantiating that additional local utility infrastructure design requirements, directly related to the implementation of Section 5.106.5.3, may adversely impact the construction cost of the project.

~~When EVCS(s) are installed, it shall be in accordance with the *California Building Code*, the *California Electrical Code* as follows:~~

5.106.5.4.1 ~~Electric vehicle charging readiness requirements for w~~arehouses, grocery stores and retail stores with planned off-street loading spaces.

[N] In order to avoid future demolition when adding EV supply and distribution equipment, spare raceway(s) or busway(s) and adequate capacity for transformer(s), service panel(s) or subpanel(s) shall be installed at the time of construction in accordance with the *California Electrical Code*. Construction plans and specifications shall include, but are not limited to, the following:

1. The transformer, main service equipment and subpanels shall meet the minimum power requirement in Table 5.106.5.4.1 to accommodate the dedicated branch circuits for the future installation of EVSE.
2. The construction documents shall indicate one or more location(s) convenient to the planned off-street loading space(s) reserved for medium- and heavy-duty ~~Z~~EV charging cabinets and charging dispensers, and a pathway reserved for routing of conduit from the termination of the raceway(s) or busway(s) to the charging cabinet(s) and dispenser(s), as shown in Table 5.106.5.4.1.
3. Raceway(s) or busway(s) originating at a main service panel or a subpanel(s) serving the area where potential future medium- and heavy-duty EVSE will be located and shall terminate in close proximity to the potential future location of the charging equipment for medium- and heavy-duty vehicles.
4. The raceway(s) or busway(s) shall be of sufficient size to carry the minimum additional system load to the future location of the charging for medium- and heavy-duty EVs as shown in Table 5.106.5.4.1.

TABLE 5.106.5.4.1, Raceway Conduit and Panel power Requirements for Medium-and-Heavy-Duty EVSE [N]

Building type	Building Size (sq. ft.)	Number of Off-street loading spaces	Additional capacity Required (kVa) for Raceway & Busway and Transformer & Panel
Grocery	10,000 to 90,000	1 or 2	200

Building type	Building Size (sq. ft.)	Number of Off-street loading spaces	Additional capacity Required (kVa) for Raceway & Busway and Transformer & Panel
		3 or Greater	400
	Greater than 90,000	1 or Greater	400
Retail	10,000 to 135,000	1 or 2	200
		3 or Greater	400
	Greater than 135,000	1 or Greater	400
Warehouse	20,000 to 256,000	1 or 2	200
		3 or Greater	400
	Greater than 256,000	1 or Greater	400

19.04.140 Standards for compliance.

The Marin County Green Building Requirements define compliance thresholds for different projects that are covered by this ordinance. These standards are summarized below in Table 1. The energy efficiency and electrification measures menu and specifications are detailed in Tables 2 and 3.

Table 1: Requirements by Project Type and Size			
Project Type and Size	**Green Building Requirements**	**Energy Efficiency Requirements**	**Electric Vehicle Requirements**
Single and Two-Family Newly Constructed or New Construction	All-electric design AND CALGreen Tier 1	Meet the standards outlined for the project in the 2022 California Energy Code	Comply with CALGreen Measure A4.106.8.1, Tier 1
Multifamily Residential Newly Constructed or New Construction			Of the total parking spaces, (i) 15% Level 2 (L2) EVCS (ii) 85% Low-Power Level 2 (LPL2) EV Ready
Hotels and Motels Newly Constructed or New Construction			Of the total parking spaces, (i) 10% Level 2 (L2) EVCS (ii) 35% Low-Power Level 2 (LPL2) EV Ready (iii) 10% Level 2 (L2) EV Capable
Nonresidential Newly Constructed or New Construction			For Nonresidential: comply with CALGreen Measure A5.106.5.3.1, Tier 1; AND For Nonresidential Grocery, Retail, or Warehouses planning off-street medium-heavy-duty loading spaces: comply with CALGreen Measure 5.106.5.4
Single and Two-Family Additions and Alterations less than 750 square feet	CALGreen Mandatory	Meet the standards outlined for the project in the 2022 California Energy Code	If the project is upgrading the main electrical service panel, comply with CALGreen Measure A4.106.8.1, Tier 1

Table 1: Requirements by Project Type and Size			
Project Type and Size	**Green Building Requirements**	**Energy Efficiency Requirements**	**Electric Vehicle Requirements**
Single and Two-Family Additions and Alterations 750 square feet or greater	CALGreen Tier 1	Using the Measure Menu in Table 2, achieve a total score that is equal to or greater than the Target Score for the applicable climate zone and install the electric readiness measures (ER2) as applicable in Table 3	If the project is upgrading the main electrical service panel, comply with CALGreen Measure A4.106.8.1, Tier 1
Multifamily Residential Additions and Alterations less than 750 square feet	CALGreen Mandatory	Meet the standards outlined for the project in the 2022 California Energy Code	If the service panel is modified, add designated electrical capacity for 20% of onsite parking spaces to be Level 2 EV Ready. If parking lot surface is modified (paving material and curbing removed): (i) add raceway to a minimum of 50% of exposed parking spaces, OR (ii) add raceway to a minimum of 20% of exposed parking spaces and install at minimum 5% EVCS to parking spaces requiring any combination of Level 2 and Direct Current Fast Charging EVSE, except at least one Level 2 EVSE shall be provided. Where existing electrical service will not be upgraded in the existing project scope, designate capacity for parking spaces to the
Multifamily Residential Additions and Alterations 750 square feet or greater	CALGreen Tier 1		
Hotels and Motels Additions and Alterations			
Nonresidential Additions and Alterations			

Table 1: Requirements by Project Type and Size			
Project Type and Size	**Green Building Requirements**	**Energy Efficiency Requirements**	**Electric Vehicle Requirements**
			maximum extent that does not require an upgrade to existing electrical service.

The following conditions also apply to Table 1:

(a) Cumulative new construction or remodels during the preceding 36-month period from the acceptance of this application shall be considered as a single covered project, and subject to the highest compliance threshold based on the cumulative project size or valuation.

(b) Mixed use (residential and commercial) projects must comply either with the applicable covered project requirements for the respective residential and commercial portions of the project or may propose to utilize a mixed-use rating system, subject to approval by the chief building official.

Table 2: Energy and Electrification Menu of Measures by Climate Zone				
Measure		**Climate Zone**		**Steps**
		2	**3**	1) Choose your Climate Zone using CEC toolfinder[1]
Specification	**Spec. ID (Refer to *Table 3*)**	**Target Score**		2) Minimum Target Score needed to comply (*1 point = 1MMBTU savings per yr.*)
		8	**6**	
Lighting	E1	Mandatory		3) Choose a measure or a combination of measures that adds up to the minimum target score above based on CZ. Measures listed as "Mandatory" MUST be installed. 4) Use the Specification Number (Spec. ID) column as a key and conform to the specifications in Table 3 below. Table 3 describes, specifies, and details compliance with each corresponding measure.
Water Heating Package	E2	1	1	
Air Sealing	E3	1	1	
R-49 Attic Insulation	E4	1	1	
Duct Sealing	E5	1	--	
New Ducts + Duct Sealing	E6	2	2	
PV + Electric Ready Pre-Wire	ER1	12	12	
Electric Readiness Measures	ER2	Mandatory (if remodeling kitchen, laundry, or upgrading panel)		
HPWH	FS1	12	12	
High Eff HPWH	FS2	13	13	
HVAC Heat Pump	FS3	13	10	
High Eff HVAC Heat Pump	FS4	14	11	
Heat Pump Clothes Dryer	FS5	1	1	
Induction Cooktop	FS6	1	1	
[1]California Energy Commission climate zone tool finder at https://www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/climate-zone-tool-maps-and.				

The following conditions also apply to Table 2:

(a) Unless otherwise specified, the requirements shall apply to the entire dwelling unit, not just the additional or altered portion.

(b) Measures from the Measure Menu in Table 2 and specified in Table 3, that already exist in the home, may be counted towards compliance with these requirements, unless otherwise specified in Table 3.

(c) Measures from the Measure Menu in Table 2 that are to be installed to satisfy requirements under the State Energy Code, Title 24, Part 6, may also be counted towards compliance with these requirements. Where these requirements conflict with other Energy Code requirements, the stricter requirements shall prevail.

Table 3. List of Measure Specifications	
ID	**Measure Specification**
Energy Measures	
E1	Lighting Measures – Replace all interior and exterior screw-in incandescent, halogen, and compact fluorescent lamps with LED lamps. Install photocell controls on all exterior lighting luminaires.
E2	Water Heating Package: Add exterior insulation meeting a minimum of R-6 to existing storage water heaters. Insulate all accessible hot water pipes with pipe insulation a minimum of ¾ inch thick. This includes insulating the supply pipe leaving the water heater, piping to faucets underneath sinks, and accessible pipes in attic spaces or crawlspaces. Upgrade fittings in sinks and showers to meet current California Green Building Standards Code (Title 24, Part 11) Section 4.303 water efficiency requirements. Exception 1: Water heater blanket is not required on water heaters less than 20 gallons. Exception 2: Water heater blanket not required if application of a water heater blanket voids the warranty on the water heater. Exception 3: Upgraded fixtures are not required if existing fixtures have rated or measured flow rates of no more than ten percent greater than 2022 California Green Building Standards Code (Title 24, Part 11) Section 4.303 water efficiency requirements. Exception 4: Water heaters with factory installed insulation of R-24 or greater

E3	Air Sealing: Seal all accessible cracks, holes, and gaps in the building envelope at walls, floors, and ceilings. Pay special attention to penetrations including plumbing, electrical, and mechanical vents, recessed can light luminaires, and windows. Weather-strip doors if not already present. Verification shall be conducted following a prescriptive checklist that outlines which building aspects need to be addressed by the permit applicant and verified by an inspector. Compliance can also be demonstrated with blower door testing conducted by a certified HERS Rater no more than three years prior to the permit application date that either: a) shows at least a 30 percent reduction from pre-retrofit conditions; or b) shows that the number of air changes per hour at 50 Pascals pressure difference (ACH50) does not exceed ten. If combustion appliances are located within the pressure boundary of the building, conduct a combustion safety test by a professional certified by the Building Performance Institute in accordance with the ANSI/BPI-1200-S-2017 Standard Practice for Basic Analysis of Buildings[1], the Whole House Combustion Appliance Safety Test Procedure for the Comfortable Home Rebates Program 2020 or the California Community Services and Development Combustion Appliance Safety Testing Protocol.
E4	R-49 Attic Insulation: Attic insulation shall be installed to achieve a weighted assembly U-factor of 0.020 or insulation installed at the ceiling level shall have a thermal resistance of R-49 or greater for the insulation alone. Recessed downlight luminaires in the ceiling shall be covered with insulation to the same depth as the rest of the ceiling. Luminaires not rated for insulation contact must be replaced or fitted with a fire-proof cover that allows for insulation to be installed directly over the cover. Exception: In buildings where existing R-30 is present and existing recessed downlight luminaires are not rated for insulation contact, insulation is not required to be installed over the luminaires.
E5	Duct Sealing: Air seal all space conditioning ductwork to meet the requirements of the 2022 Title 24 Section 150.2(b)1E. The duct system must be tested by a HERS Rater no more than three years prior to the Covered Single Family Project permit application date to verify the duct sealing and confirm that the requirements have been met. This measure may not be combined with the New Ducts and Duct Sealing measure in this Table.
E6	New Ducts + Duct Sealing: Replace existing space conditioning ductwork with new R-8 ducts that meet the requirements of 2022 Title 24 Section 150.0(m)11. This measure may not be combined with the Duct Sealing measure in this Table. To qualify, a preexisting measure must have been installed no more than three years before the Covered Single Family Project permit application date.
E7	Windows: Replace all existing windows with high performance windows with an area-weighted average U-factor no greater than 0.32.
E8	R-13 Wall Insulation: Install wall insulation in all exterior walls to achieve a weighted U-factor of 0.102 or install wall insulation in all exterior wall cavities that shall result in an installed thermal resistance of R-13 or greater for the insulation alone.
Fuel Substitution Measures	

FS1	Heat Pump Water Heater (HPWH): Replace all existing electric resistance and natural gas storage water heaters with heat pump water heaters.
FS2	High Efficiency Heat Pump Water Heater (HPWH): Replace all existing electric resistance and natural gas storage water heaters with heat pump water heaters with a Northwest Energy Efficiency Alliance (NEEA) Tier 3 or higher rating.
FS3	HVAC Heat Pump: Replace all existing gas space heating system and existing electric resistance heating systems with electric heat pump systems.
FS4	High Efficiency HVAC Heat Pump: Replace all existing gas space heating system and existing electric resistance heating systems with electric heat pump systems with a SEER rating of 21 or greater and an HSPF rating of 11 or greater.
FS5	Heat Pump Clothes Dryer: Replace all existing electric resistance clothes dryers with heat pump dryers with no resistance element and cap the gas lines.
FS6	Induction Cooktop: Replace all existing gas and electric resistance stove tops with inductive stove tops and cap the gas lines.
Solar PV and Electric-Readiness Measures	
ER1	PV+ Electric Ready Pre-Wire: For New PV Systems: Install a new solar PV system that meets the requirements of 2022 Title 24 Section 150.1(c)14 and upgrade the service panel to meet the requirements of ER2. G. and install any two of the other measures from ER2.A – ER2. F. For Existing PV Systems: If the home already has an existing PV system, to claim credit for this measure, ER1, upgrade the service panel to meet the requirements of ER2. G. and install any two of the other measures from ER2.A – ER2. F.
ER2	Electric Readiness Measures: To claim credit for Item ER1, in addition to the solar PV system installed, upgrade the panelboard to meet the requirements of Item ER2.G and install any two of the other measures ER2.A – ER2.F, below to allow for installation of electric appliances at a future date. For any Covered Project, if the service panel is being upgraded, install any two of the other measures below. If the laundry room is being remodeled, comply with Item ER2.D, and upgrade the panelboard to meet the requirements of Item ER2. G. If the kitchen is being remodeled, comply with Item ER2.C, and upgrade the service panel to meet the requirements of Item ER2. G. A. Heat Pump Water Heater Ready, as specified in Section 150.0(n)1. B. Heat Pump Space Heater Ready, as specified in Section 150.0(t). C. Electric Cooktop Ready, as specified in Section 150.0(u). D. Electric Clothes Dryer Ready, as specified in Section 150.0(v). E. Energy Storage Systems (ESS) Ready, as specified in Section 150.0(s).

	F. EV Charger Ready. Install a listed raceway for an EV charger, that meets the requirements of the California Green Building Standards Code (Title 24, Part 11) Section A4.106.8.1, Tier 1 and 2, which otherwise applies to new construction. G. Upgrade the panelboard serving the individual dwelling to either: (i) a minimum 200-amp panel with a minimum 225-amp busbar rating to accommodate future connection of electric appliances, including heat pump water heaters, heat pump space heaters, electric cooktops, electric clothes dryers as specified in California Energy Code Section 150.0 (n), (t), (u) and (v) and Level 2 electric vehicle supply equipment; or, (ii) provide electrical load calculations and appliance specifications for serving all of these end-uses with a minimum 100-amp panel. Exception: If an electrical permit is not otherwise required for the project other than compliance with this Item, ER2.

19.04.150 Incentives for compliance.

In addition to the required standards for compliance, the Board of Supervisors may establish by resolution, financial or application processing incentives and/or award or recognition programs to encourage higher levels of green building compliance for a project.

19.04.160 Administrative procedures.

The procedures for compliance with the provisions of this chapter shall include, but not be limited to the following:

(a) *Project design.* Applicants for a covered project are strongly encouraged to involve a qualified green building rater in the initial design phases of the project in advance of submittal of an application to determine applicable green building compliance thresholds and the most cost effective and appropriate means of achieving compliance.

(b) *Planning applications.* If a discretionary planning application is required for a covered project, applicants should be prepared to identify expected green building measures to be included in the project to achieve the compliance thresholds. Applicants should identify any anticipated difficulties in achieving compliance and any exemptions from the requirements of this chapter that may be requested.

(c) *Building plan check review.* Upon submittal of an application for a building permit, building plans for any covered project shall include a green building program description and completed checklist. The checklist shall be incorporated onto a separate full-sized plan sheet included with the building plans. Evidence that the project, as indicated by the project plans and green building program description, will achieve the standards for compliance outlined in Section 19.04.140, shall be provided prior to issuance of a building permit.

(d) *Changes during construction.* During the construction process, alternate green building measures may be substituted, provided that documentation of the proposed

change and the project's continued ability to achieve the standards for compliance to the chief building official shall be provided.

(e) *Final building inspection.* Prior to final building inspection and occupancy for any covered project, evidence that project construction has achieved the required compliance set forth in the standards for compliance outlined in Section 19.04.140 shall be provided. The chief building official shall review the documentation submitted by the applicant and determine whether the project has achieved the compliance threshold as set forth in the standards for compliance outlined in Section 19.04.140. If the chief building official determines that the applicant has met these requirements, the final building inspection may proceed.

(f) *Conflict with other laws.* The provisions of this chapter are intended to be in addition to and not in conflict with other laws, regulations and ordinances relating to building construction and site development. If any provision of this chapter conflicts with any duly adopted and valid statutes or regulations of the federal government or the state of California, the federal or state statutes or regulations shall take precedence.

19.04.170 Exemptions.

(a) The provisions of this chapter shall not apply to:

(1) Buildings which are temporary (such as construction trailers).

(2) Building area which is not or is not intended to be conditioned space.

(3) Any requirements of this chapter which would impair the historic integrity of any building listed on a local, state, or federal register of historic structures, as determined by the chief building official and as regulated by the California Historic Building Code (Title 24, Part 8). In making such a determination, the chief building official may require the submittal of an evaluation by an architectural historian or similar expert.

(b) As outlined in the 2022 CALGreen code, section 4.106.4 and A5.106.5, applicants may be exempted from the electric vehicle changing requirements on a case-by-case basis where the local enforcing agency has determined EV charging and infrastructure are not feasible based upon one or more of the following conditions:

(1) Where there is no commercial power supply, or the local utility is unable to supply adequate power.

(2) Where there is evidence suitable to the local enforcing agency substantiating that additional local utility infrastructure design requirements, directly related to the implementation of section 4.106.4 and A5.106.5 may adversely impact the construction cost of the project.

(3) ADUs and JADUs without additional parking facilities.

(4) Parking spaces accessible only by automated mechanical car parking systems are not required to comply with CALGreen Code section 4.106.4 and A5.106.5

(c) Hardship or infeasibility exemption. If an applicant for a covered project believes that circumstances exist that make it a hardship or infeasible to meet the requirements of this chapter, the applicant may request an exemption as set forth below. In applying for an exemption, the burden is on the applicant to show hardship or infeasibility.

(1) *Application.* Based on the following, the applicant shall identify in writing the specific requirements of the standards for compliance that the project is unable to achieve and the circumstances that make it a hardship or infeasible for the project to comply with this chapter. The applicant may not petition for relief from any requirement of the 2022 California Energy Code (Title 24, Part 6) and referenced standards, or the 2022 California Green Building Standards (Title 24, Part 11) of the California Building Standards Code. Circumstances that constitute hardship or infeasibility shall include one of the following:

a. That the cost of achieving compliance is disproportionate to the overall cost of the project;

b. That strict compliance with these standards would create or maintain a hazardous condition(s) and present a life safety risk to the occupants.

(2) *Granting of exemption.* If the chief building official determines that it is a hardship or infeasible for the applicant to fully meet the requirements of this chapter and that granting the requested exemption will not cause the building to fail to comply with the 2022 California Energy Code (Title 24, Part 6) and referenced standards, or the 2022 California Green Building Standards (Title 24, Part 11) of the California Building Standards Code, the chief building official shall determine the maximum feasible threshold of compliance reasonably achievable for the project. In making this determination, the chief building official shall consider whether alternate, practical means of achieving the objectives of this chapter can be satisfied, such as reducing comparable energy use at an off-site location within the county. If an exemption is granted, the applicant shall be required to comply with this chapter in all other respects and shall be required to achieve the threshold of compliance determined to be achievable by the chief building official.

(3) *Denial of exception.* If the chief building official determines that it is reasonably possible for the applicant to fully meet the requirements of this chapter, the request shall be denied, and the applicant shall be notified of the decision in writing. The project and compliance documentation shall be modified to comply with the standards for compliance.

(4) *Appeal.* Any aggrieved applicant or person may appeal the determination of the chief building official regarding the granting or denial of an exemption or compliance with any other provision of this chapter. An appeal of a determination of the chief building official shall be filed in writing and processed in accordance with the provisions of Section 19.04.028 of this code.

19.04.180 Revocable building and infrastructure exemptions.

Notwithstanding the requirements of this chapter and the greenhouse gas emissions and other public health and safety hazards associated with natural gas infrastructure, minimally necessary and specifically tailored natural gas infrastructure shall be allowed in a newly constructed or new construction building on a revocable basis limited to the duration of time during which the conditions set forth below are satisfied and the building continues occupancy as the original design specified in the construction drawings permitted by the county as a newly constructed or new construction building.

If the conditions are no longer satisfied, the natural gas infrastructure shall either be capped, otherwise terminated, or removed in a manner pursuant to all applicable Codes in this subchapter. The following uses are subject to this exemption:

(a) A newly constructed or new construction building meeting the definition of "food service establishment" in §19.04.120(20). The scope of the exemption extends to the preparation of food only, not HVAC, or water heating appliances.

SECTION III: SECTION 19.07.05 OF SUBCHAPTER 2 OF MARIN COUNTY CODE CHAPTER 19.07 IS AMENDED

19.07.050 – Compliance

Compliance with the requirements of this chapter shall be demonstrated through any of the compliance options in Sections 19.07.050.2 through 19.07.050.5.

Table 19.07.050 Cement and Embodied Carbon Limit Pathways

	Cement limits for use with any compliance method 19.07.050.2 through 19.07.050.5	**Embodied Carbon limits** for use with any compliance method 19.07.050.2 through 19.07.050.5
Minimum specified compressive strength f'_c, psi (1)	Maximum ordinary Portland cement content, lbs./yd^3 (2)	Maximum embodied carbon kg CO_2e/m^3, per EPD
up to 2500	362	260
3000	410	289
4000	456	313
5000	503	338
6000	531	356
7000	594	394
7001 and higher	657	433
up to 3000 light weight	512	578
4000 light weight	571	626
5000 light weight	629	675

Notes
1. For concrete strengths between the stated values, use linear interpolation to determine cement and/or embodied carbon limits.
2. Portland cement of any type per ASTM C150 or ASTM C595

SECTION IV: EFFECTIVE DATE AND PUBLICATION

Pursuant to Government Code §25123, this Ordinance shall become effective on January 1, 2023, provided that the additional energy efficiency requirements of this Ordinance cannot be

enforced by the County until it has further been approved by the California Energy Commission (Cal. Pub. Res. Code §25402.1(h)(2)).

In accordance with Government Code §25124(b)(1), a summary of this Ordinance shall also be published before the expiration date of fifteen (15) days after its passage, with the names of the Supervisors voting for and against the same in the Marin Independent Journal, a newspaper of general circulation published in the County of Marin. A certified copy of the full text of this Ordinance along with the names of those Board of Supervisors members voting for and against the ordinance shall also be posted in the office of the Marin County Board of Supervisors. This ordinance is enacted pursuant to and in compliance with Cal. Health and Safety Code §17958 §17958.5, §17958.7 and §18941.5; and Cal. Public Resources Code Section 25402.1(h)(2).

Prior to the effective date, a copy of this Ordinance shall be filed with the California Building Standards Commission complete with local findings for each local amendment to the California Building Standards Code, as required by Cal. Health and Safety § 17959.

SECTION V: SEVERABILITY

Every section, paragraph, clause, and phrase of this Ordinance is hereby declared to be severable. If for any reason, any section, paragraph, clause, or phrase is held to be invalid or unconstitutional, such invalidity or unconstitutionality shall not affect the validity or constitutionality of the remaining sections, paragraphs, clauses or phrases, and the remaining portions or this ordinance shall continue in full force and effect unless amended or modified by the County.

SECTION VI: CALIFORNIA ENVIRONMENTAL QUALITY ACT

This Ordinance was assessed in accordance with the authority and criteria contained in the California Environmental Quality Act (CEQA), the State CEQA Guidelines, and the environmental regulations of the County. The Board of Supervisors hereby finds that pursuant to CEQA Guidelines section 15378(b)(5), action on this item is not a project subject to CEQA because it is an administrative governmental activity which will not cause a direct or indirect physical change in the environment. The Board of Supervisors also finds that under section 15061(b)(3) of the State CEQA Guidelines, this Ordinance is exempt from the requirements of CEQA because it can be seen with certainty that the provisions contained herein would not have the potential for causing a significant effect on the environment. Further, it also finds the Ordinance is exempt from the requirements of CEQA pursuant to CEQA Guidelines sections 15307 and 15308 as an action by a regulatory agency taken to protect the environment and natural resources.

SECTION VII: VOTE

Notice of this Ordinance was published pursuant to Government Code §50022.3, §6066, and §25124(b)(1), and a certified copy of the full text of this Ordinance was posted in the office of the Clerk of the Marin County Board of Supervisors at least five (5) days prior to the Board of Supervisors meeting at which it was adopted.

PASSED AND ADOPTED at a regular meeting of the Board of Supervisors of the County of Marin held on this 15th day of November 2022 by the following vote:

AYES:	SUPERVISORS	Dennis Rodoni, Judy Arnold, Stephanie Moulton-Peters, Katie Rice
NOES:	NONE	
ABSENT:	Damon Connolly	

PRESIDENT, BOARD OF SUPERVISORS

ATTEST:

CLERK

Public Assistance

CalFresh Benefit Replacement for Food Loss

Are you a CalFresh recipient experienced food loss due to a fire, flood, power outage lasting more than 4 hours?

You can request a partial replacement of your CalFresh benefits if your food was lost due to a fire, flood or power outage lasting more than 4 hours.

For food loss resulting from the storms on January 7, 2023 through January 12, 2023, you have until February 7, 2023 to report the food loss and request CalFresh benefits replacement.

For food loss resulting from fire, flood, power outage lasting more than 4 hours but **not** due to the storms that began on January 7, 2023 through January 12, 2023, you have 10 days from the date of the event to report the food loss and request CalFresh benefits replacement.

Call our our Eligibility Worker or Call Center at (877) 410-8817 or come into one of our offices locations (Please note Modified service announcement above).

How do I request replacement of my CalFresh Food benefits?

You need to complete, sign, and submit a form called “CF 303” to your local Public Assistance office. Include your contact information and a short description of how your food was lost. Include the date and time of the event that caused the food loss.

- English CF 303 form

- English CF 303 form
- Spanish CF 303 form
- Vietnamese CF 303 form

Reemplazo de Beneficios de CalFresh por Perdida de Alimentos

¿Es usted un beneficiario de CalFresh que experimentó pérdida de alimentos debido a un incendio, una inundación o un corte de energía que duró más de 4 horas?

Si su perdida de alimentos fue debido a las tormentas que comenzaron el 7 de enero de 2023 a el 12 de enero de 2023, tiene hasta el 7 de febrero de 2023 para informar las perdida de alimentos y solicitar el reemplazo parcial de los beneficios de CalFresh.

Puede solicitar un reemplazo parcial de sus beneficios de CalFresh si sus alimentos se perdieron debido a un incendio, una inundación o un corte de energía que duró más de 4 horas. **Tiene 10 días para informar la pérdida de alimentos y solicitar el reemplazo de los beneficios de CalFresh.**

Llame a su oficina local de Asistencia Pública al (877) 410-8817

Servicio presencial disponible en las oficinas de Asistencia Pública (favor de notar anuncio de servicios limitados).

¿Cómo solicito el reemplazo de mis beneficios de CalFresh Food?

Debe llenar, firmar y enviar un formulario "CF 303" en español a su oficina de Asistencia Pública local. Incluya su información de contacto y una breve descripción de cómo se perdió su comida. Incluya la fecha y hora del evento que causó la pérdida de alimentos.

BenefitsCal is here!

BenefitsCal.com is a new simple way for customers to apply for, view, and renew benefits for health coverage, food and cash assistance.

BenefitsCal is the first statewide automated site built by and for the people of California. Together, we benefit.

BenefitsCal will make it easier than ever to:

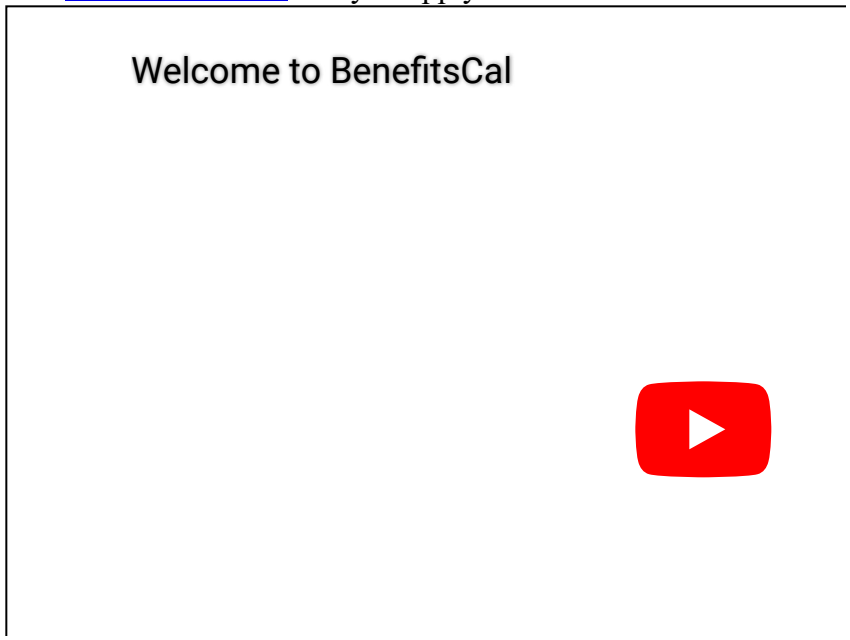
- Apply online
- Renew your benefits
- Upload documents
- Report changes
- Connect with a caseworker

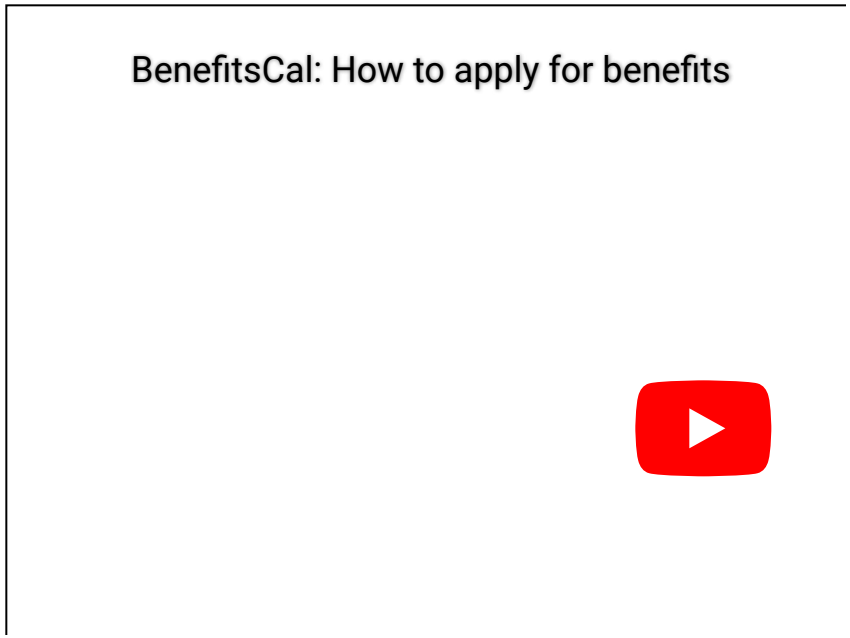
BenefitsCal supports applications for

- CalFresh

- Medi-Cal/County Medical Services Program (CMSP)
- CalWORKS
- General Aid/General Relief (GA/GR)
- Disaster CalFresh
- Cash Assistance Program for Immigrants (CAPI)

Visit BenefitsCal.com today to apply.





The Public Assistance Branch of the Division of Social Services is responsible for the administration the major public assistance programs in Marin County. Division staff provide eligibility determinations and related services for the following programs:
CalWorks, ***Medi-Cal***, ***CMSP***, ***CalFresh - SNAP***

Verifications Required:

When applying for public assistance programs, certain items are required to determine if an individual or family is eligible. The verifications needed may vary depending on the program you are applying for.

Please provide the following items for each family member applying for aid, if applicable:

- Picture identification card
- Social Security card
- Medicare card or other health insurance card
- Proof of citizenship or immigration status (birth certificate, passport, immigration card or VISA)
- Proof of address (lease, rent receipt, utility bill)
- Proof of income (paystubs, Federal income tax return with all attachments for self-employed, unemployment or disability payments, cash gifts or loans received)
- Verification of property/assets (checking, savings, IRA or retirement account statements, car registration(s), land owned, etc.)
- Additional verification may be requested

Welfare Fraud:

The Special Investigations Unit (SIU) is responsible for maintaining the integrity of public assistance programs. Welfare fraud investigators are charged with deterring, detecting and prosecuting fraud. This ensures that our programs are available for those in need of assistance. Referrals are received from the community, automated detection systems, eligibility staff and other agencies, hotlines, etc. All referrals are investigated, and the caller may remain anonymous. We have a bilingual speaking investigator available for Spanish referrals and assisting in translations.

SIU also contains the Collections Unit, which is responsible for billing and collecting overpayments due to administrative errors, client caused errors, and intentional program violations. Marin participates in the Tax Intercept Program which enables our Department to collect money from clients that are not paying by intercepting their tax returns.

To report suspected fraud for CalWORKs, CalFresh, General Assistance or In-Home Support Services (IHSS) please call (415) 473-7071 or fax (415) 473-7166.

To report Medi-Cal suspected fraud for Medi-Cal, please call (800) 822-6222, emailstopmedicalfraud@dhcs.ca.gov, or submit a complaint form online at ***https://apps.dhcs.ca.gov/AutoForm2/default.aspx?af=1828***.

Online Eligibility Screener: find out if you might qualify for helpful benefits.

CalFresh - SNAP
CalWORKS
Medi-Cal

- **120 North Redwood Dr, San Rafael**

- **1 6th St., Point Reyes Station (West Marin)**

- **3240 Kerner Blvd., San Rafael**

1-877-410-8817

Public Assistance:

[120 North Redwood Dr, San Rafael](#) ,
[1 6th St., Point Reyes Station (West Marin)](#) ,
[3240 Kerner Blvd., San Rafael](#)

1-877-410-8817

Accessibility Information

If you are a person with a disability and require an accommodation to participate in a County program, service, or activity, requests may be made by calling (415) 473-4381 (Voice), Dial 711 for CA Relay, or by email at least five business days in advance of the event. We will do our best to fulfill requests received with less than five business days' notice. Copies of documents are available in alternative formats upon request.

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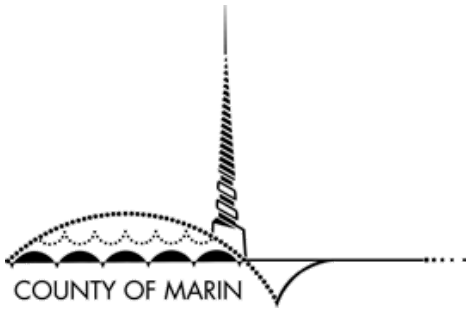

MARIN COUNTY PLANNING DIVISION
MINISTERIAL DECISION
Village Baptist Affordable Housing Zoning Compliance Review

Decision:	Approve with Conditions
Date:	November 30, 2020

Project ID No:	P2813	Applicant(s):	Alex Gevorgian
Application No(s):	N/A		
		Owner(s):	Affordable Housing Land Consultants, LLC
		Assessor's Parcel No(s):	052-112-03
		Property Address:	825 Drake Avenue, Marin City
		Project Planner:	Immanuel Bereket (415) 473-2755 ibereket@marincounty.org
		Signature:	

Countywide Plan Designation:	MF- 4.5 (Multi-Family Residential, 11-40 units/acre)
Community Plan Area:	Marin City Community Plan
Zoning District:	RMP- 34 (Residential, Multiple-family Planned District)
Environmental Determination:	Exempt per Government Code Section 65913.4 (a); Public Resources Code §21080(b)(l).

PROJECT SUMMARY

The applicant requests Zoning Compliance Review approval to demolish an existing 9,750 square foot church and construct a new 73,793 square foot multi-family apartment building on a lot in Marin City. The project would entail the construction of a five-story, 56 feet eight inches tall, residential building with 74 units restricted to lower-income households, as defined in Health and Safety Code Section 50079.5,[1] a manager's office, residential amenities, and 24 on-site parking spaces. Exterior walls would be set back 13 feet four inches from the southern front property line; 28 feet two inches from the eastern side property line; six feet nine inches from the western side property line; and 42 feet one inch from the northern rear property line. The 74 units are comprised of 24 one-bedroom units, 42 two-bedroom units, and eight three-bedroom units.

[1] "Lower income households" includes very low income households, as defined in Section 50105, and extremely low income households, as defined in Section 50106.

The removal of one tree, classified as "heritage" per the Marin County Development Code section 22.62.020 is proposed. Proposed landscaping includes various perennial shrubs, ground covers, grass, stormwater management plantings, and trees including three Coastal Live Oak (Quercus agrifolia), five Monterey Cypress (Hesperocyparis macrocarpa), seven Desert Museum Pal Verde (Parkinsonia), Western Redbud (Cercis occidentalis).

Various site improvements would also be entailed in the proposed development, including a new retaining wall that would be 13 feet five inches high, new driveways, secure storage for 30 bicycles, and general site improvements to accommodate the proposed project.

Under Government Code Section 65913.4 ("SB 35"), a Zoning Compliance Review is required because the application meets the eligibility criteria outlined in Government Code Section 65913.4.

BASIS OF APPROVAL

The proposed project is consistent with Government Code Section 65915 (Density Bonus Law) and Government Code Section 65913.4 (SB 35) for the following reasons:

A. Section 65915 – 65918 (State Density Bonus Law)

The State Density Bonus Law is one of the main ways to encourage affordable housing development. Government Code section 65915 (Density Bonus Law) allows applicants that provide sufficient affordable housing in their residential projects to receive, an increase over the otherwise maximum allowable residential density (a "density bonus"), as well as other benefits. The Density Bonus Law enables eligible applicants to receive (1) a density bonus, (2) incentives and concessions, (3) waivers and reductions of development standards, and (4) reduced parking requirements. To determine how many bonus units are awarded, the Density Bonus Law uses a sliding scale based on the percentage of affordable units provided and their level of affordability.

Under the Government Code Section 65915(d)(1), the applicant has requested an 80 percent density increase over the otherwise maximum allowable gross residential density. In addition, the applicant has requested the following concessions:

1. **Height**: Relief from the requirement in Marin Development Code Section 22.10.040 for a building height increase from 30 feet to 56 feet eight inches;
2. **Windows**: Relief from the requirement of the Multi-Family Design Guidelines Policy DG-20, for reduction of windows and fenestration from 25 percent to 21 percent; and
3. **Tree Canopies**: Relief from the requirement of the Multi-Family Design Guidelines Policy DG-80, for a reduction in tree canopies from 25 percent to zero percent.

In addition, the applicant requested the following waivers to development under Government Code Section 65915 (e)(1):

1. **Open space**: Relief from the Multi-Family Design Guidelines Policy DG-29 to reduce the required open space from 7,400 square feet to 1,665 square feet; and
2. **Bicycle Parking**: Relief from the Multi-Family Design Guidelines Policy DG-84, for reduction of bicycle storage from 37 to 30 spaces.

The Countywide (CWP) is the governing general plan for the unincorporated areas of the County and establishes goals, policies, and programs that govern existing and future land uses and developments. The Countywide Plan also includes adopted community area plans as they pertain to specific unincorporated communities.

The project site is in Marin City and within the City-Centered Corridor, which is primarily designated for urban development in conjunction with environmental resources protection. Medium to high-density residential land use categories are established within the City-Centered Corridor in communities where multi-family development can be accommodated with easy access to a full range of urban services at locations near major arterials, public transit, and community and regional shopping facilities.

The project site is subject to the CWP's MF 4.5 (Multi-Family Residential, 11-40 units per acre) land use designation, and the City-Centered Corridor policies. This land use designation translates to a potential residential density range of 11.11 to 40.4 units for the subject property, given its size of 1.01 acres. The subject property is governed by the RMP – 34 (Residential, Multiple-family Planned District) zoning designation, which permits a maximum density of 34 dwelling units per acre. In instances where density allowed under the zoning ordinance is inconsistent with the density allowed under the Countywide Plan's land use element, the general plan density prevails under Government Code Section 65915(o)(2). Therefore, the project's base density is 41 units, as stipulated in the CWP.[2]

Since the proposed project is exclusively an affordable housing project for lower-income households, as defined in Health and Safety Code § 50079.5, and is located less than one-half mile from a major transit stop, as defined in subdivision (b) of Section 21155 of the Public Resources Code, the project qualifies for a density bonus increase of 80 percent, or 33 units, above the otherwise maximum allowable density under the Countywide Plan under the State Density Bonus law. As illustrated in Table 1 below, the project density would increase from 41 units to 74 units.

Table 1 – Density Bonus Calculations

BASE PROEJCT	BASE UNIT	% VLI UNITS	# VLI UNITS	DENSITY EARNED	DB UNITS	DB UNITS	PROJECT TOTAL
Project without Density Bonus	Base Units (rounded up)	VLI = Very Low Income <50 AMI	% VLI x Base # Units	Per State Law	%Bonus x Base # Units	%Bonus x Base # Units (rounded up)	%Bonus x Base # Units (rounded up)
40.4	41.00	100%	41.00	80.0%	32.80	33.00	74.00

Note: Each component of any density calculation, including base density and bonus units, resulting in fractional units, shall be separately rounded up to the next whole number.

[2] The Community Development and Planning Areas chapters of the CWP together form the Land Use Element of the CWP. The Community Development chapter includes policies that restrict density to the lowest end of the range while the Planning Areas chapter does not have provisions that restrict density. The CWP Implementing Program CD-6.a (pg. 3.4-26) provides that annexation of lands proposed for development in urban service areas should be encouraged "by calculating density at the lowest end of the Countywide Plan designation range . . . (unless limited to housing affordable to very-low or low-income residents. . .). This policy is inapplicable in this case because the project is a multi-family housing development that contains 74 residential units that will be reserved for “Lower income households”, as defined in Health and Safety Code § 50079.5.

The applicant is allowed up to a maximum of an 80 percent density increase and four concessions under the Density Bonus Laws, due to the amount of affordable housing proposed in the application and due to the site's location 0.1 mile away from a Marin County Transit District bus stop.

Government Code Section 65915 states that the County shall approve a density bonus and requested incentive(s) unless it finds that:

1. *The incentives do not result in identifiable and actual cost reductions to provide for affordable housing costs as defined in California Health and Safety Code Section 50052.5 or Section 50053 for rents for the affordable units.*

   As detailed in the application material, the requested concessions are necessary to allow the construction of the density bonus units on the site, and would result in in an actual, identifiable cost reduction. If the project complied with the County's development standards, and the requested concessions were denied, the bonus units would be eliminated, translating to an increase in land and soft costs per unit.

   The record does not contain substantial evidence that would allow the County to make a finding that the requested incentives do not result in identifiable and actual cost reductions to provide for affordable housing costs per State Law. The California Health & Safety Code Sections 50052.5 and 50053 define formulas for calculating affordable housing costs for very-low, low-, and moderate-income households. Section 50052.5 addresses owner-occupied housing, and Section 50053 addresses rental households. Affordable housing costs are a calculation of residential rent or ownership pricing not to exceed 25 percent gross income based on area median income thresholds dependent on affordability levels.

   The requested incentives would result in building design or construction efficiencies that provide for affordable housing costs. The requested incentives allow the developer to expand the building height so the additional units can be constructed, and the overall space dedicated to residential uses is increased. The incentives support the project's goal to construct an income-restricted housing development for Lower Income households for a period no less than 55 years.

2. *The incentives will have a specific adverse impact upon public health and safety or the physical environment, or on any real property that is listed in the California Register of Historical Resources and for which there are no feasible methods to satisfactorily mitigate or avoid the specific adverse impact without rendering the development unaffordable to Very Low, Low and Moderate Income households. Inconsistency with the zoning ordinance or the general plan land use designation shall not constitute a specific, adverse impact upon the public health or safety (Government Code Section 65915(d)(1)(B) and 65589.5(d)).*

   The project has been reviewed the Department of Public Works, the Marin County Fire Department, the Sausalito-Marin City Sanity District, and the Marin Municipal Water District. There is no substantial evidence in the record to support a finding that the proposed incentives will result in a specific adverse impact. A "specific adverse impact," as defined in paragraph (2) of subdivision (d) of Section 65589.5, means "a significant, quantifiable, direct and unavoidable impact, based on objective, identified written public

health or safety standards, policies, or conditions as they existed on the date the application was deemed complete." As discussed above, the project meets the eligibility criterion that is required for density bonus projects. The project also does not involve a designated historical landmark. Therefore, there is no substantial evidence that the proposed incentives will have a specific adverse impact on public health and safety.

3. *The incentives are contrary to state or federal law.*

   There is no evidence in the record that the proposed incentives are contrary to Federal and State laws because the building will be constructed in compliance with the California Building Code.

Following is a discussion of the findings related to the Waiver of Development Standard, pursuant to Government Code Section 65915.

1. *The waiver will have specific adverse impact upon public health and safety or the physical environment, or on any real property that is listed in the California Register of Historical Resources and for which there is no feasible method to satisfactorily mitigate or avoid the specific adverse Impact without rendering the development unaffordable to Very Low, Low and Moderate Income households. Inconsistency with the zoning ordinance or the general plan land use designation shall not constitute a specific, adverse impact upon the public health or safety.*

   There is no substantial evidence in the record that the proposed waiver of open space and bicycle parking requirements will have a specific adverse impact. A "specific adverse impact," as defined in paragraph (2) of subdivision (d) of Section 65589.5, means "a significant, quantifiable, direct and unavoidable impact, based on objective, identified written public health or safety standards, policies, or conditions as they existed on the date the application was deemed complete". The project does not involve the demolition of a historic structure that was placed on a national, state, or local historic register prior to the submission of the application. Therefore, there is no substantial evidence that the proposed waivers of development standards will have a specific adverse impact on public health and safety.

2. *The waiver or reduction of development standard is contrary to state or federal law.*

   There is no evidence in the record that the proposed waivers are contrary to Federal or State laws.

These determinations, including the density bonus, the three concessions, and two waivers listed above, are collectively referred to as the "Project", and are reflected in the plan set in Attachment "A."

B. Government Code Section 65913.4 (SB 35)

Government Code Section 65913.4 sets forth a streamlined, ministerial approval process for certain housing developments in jurisdictions that have not made sufficient progress toward meeting their affordable housing goals as mandated by the State. On February 1, 2018, the California Department of Housing and Community Development ("HCD") determined that Marin County has not issued enough building permits to satisfy its RHNA obligation for all low-income, very-low income, and moderate-income categories. Therefore, HCD determined that the County

is subject to the streamlined, ministerial review and approval provisions in Government Code Section 65913.4 for very-low, low-income, and moderate-income housing projects.

The applicant submitted the Application to the County on May 19, 2020, under Government Code Section 65913.4. Upon preliminary review of the application, the County requested clarifying information, which was subsequently submitted by the applicant on August 7, 2020, August 28, 2020, and September 2, 2020. Within the prescribed 60-day time frame of resubmittal, the County determined that the application met the eligibility criteria outlined in Government Code Section 65913.4. On October 1, 2020, the County issued a letter informing the applicant that the application qualifies for the streamlined, ministerial review process.

In addition to the project plans received August 13, 2020, below is a list of the application's supporting information that the County reviewed in making this determination. All this information is located on the County's website.

1. Project Description
2. SB 35 Eligibility & Exhibits
3. Request for Development Incentives and Waivers
4. Affordable Housing Plan
5. Preliminary Title Report, prepared by First American Title Company, dated November 25, 2019
6. Phase I Environmental Site Assessment, prepared by Environmental Geology Services, dated September 23, 2015
7. Geotechnical Report, prepared by Herzog Geotechnical Consulting Engineers, dated September 25, 2015
8. Arborist Survey Report, prepared by WRA Environmental Consultants, dated March 2020
9. Biological Site Assessment, prepared by WRA Environmental Consultants, dated
10. Archaeological Report, prepared by Archaeological Resources Service, dated January 30, 2020

Under Government Code Section 65913.4(a), a development proponent may apply for a development that is subject to the streamlined, ministerial approval process provided by subdivision (b). The local agency cannot require a conditional use permit if the development satisfies all of the following objective planning standards:

1. *The development is a multifamily housing development that contains two or more residential units.*

   County analysis: The project is a multi-family housing development that contains 74 residential units and is 100% affordable, excluding the manager's unit.

2. *The development is located on a site that satisfies all of the following:*

   a. *A site that is a legal parcel or parcels located in a City if, and only if, the City boundaries include some portion of either an urbanized area or urban cluster, as designated by the United States Census Bureau, or, for unincorporated areas, a legal parcel or parcels wholly within the boundaries of an urbanized area or urban cluster, as designated by the United States Census Bureau.*

   County analysis: The project is located in the unincorporated area of the County within the boundaries of an urbanized area, as designated by the United States 2010 Census

Bureau, urbanized area boundary for San Francisco—Oakland, CA. (index. UA-78904-San Francisco-Oakland)

b. A site in which at least 75 percent of the perimeter of the site adjoins parcels that are developed with urban uses. For the purposes of this section, parcels that are only separated by a street or highway shall be considered to be adjoined.

County analysis: The site is surrounded entirely by urban uses. "Urban uses", as defined in SB 35, means "any current or former residential, commercial, public institutional, transit or transportation passenger facility, or retail use, or any combination of those uses." SB35 further clarifies that "parcels that are only separated by a street or highway shall be considered to be adjoined." Based on these standards, the entirety of the project site's perimeter is developed with urban uses.

c. A site that is zoned for residential use or residential mixed-use development, or has a general plan designation that allows residential use or a mix of residential and nonresidential uses, with at least two-thirds of the square footage of the development designated for residential use.

County analysis: The Countywide (CWP) is the governing general plan for the unincorporated areas. The CWP designated the project site as Multi-Family Residential, with a density range of 11 to 40 units per acre (MF 4.5). This land use designation translates to a potential residential density range of 11.11 to 40.4 units for the subject property given its size of 1.01 acres. The proposed project is a residential project with two or more units. Residential use is allowed by the property's RMP-34 (Residential, Multiple-family Planned) zoning district.

3. If the development contains units that are subsidized, the development proponent already has recorded, or is required by law to record, a land use restriction for the following applicable minimum durations:

a. Fifty-five years for units that are rented.

County analysis: The SB 35 Guidelines defines "subsidized" as "units that are price or rent restricted such that the units are permanently affordable to households meeting the definitions of very low and lower income, as defined in Sections 50079.5 and 50105 of the Health and Safety Code"

The project contains 74 units – 73 below market rate and 1 manager's unit. Pursuant to Marin County Code Section 22.22.080, the applicant is required per the Conditions of Approval to record a covenant to the satisfaction of the County to reserve all affordable housing units within the project to lower income households in perpetuity, unless the County reduces the term of the affordability requirement to reflect the maximum term that is permitted by Federal or State financing sources.

b. Forty-five years for units that are owned.

County analysis: If the units are subdivided for sale, they will be subject to income qualifications and resale restrictions. However, the project as proposed, is an income-restricted development available for rent only. The applicant will be required to record a deed restriction, making the development available for rent in perpetuity, unless the County reduces the term of the affordability requirement to reflect the maximum term that is permitted by Federal or State financing sources.

4. *The development satisfies both of the following:*

    a. *Is located in a locality that the department has determined is subject to this subparagraph on the basis that the number of units that have been issued building permits is less than the locality's share of the regional housing needs, by income category, for that reporting period. A locality shall remain eligible under this subparagraph until the department's determination for the next reporting period. A locality shall be subject to this subparagraph if it has not submitted an annual housing element report to the department pursuant to paragraph (2) of subdivision (a) of Section 65400 for at least two consecutive years before the development submitted an application for approval under this section.*

    b. *The development is subject to a requirement mandating a minimum percentage of below market rate housing based on one of the following:*

        i. *The locality did not submit its latest production report to the department by the time period required by Section 65400, or that production report reflects that there were fewer units of above moderate-income housing approved than were required for the regional housing needs assessment cycle for that reporting period. In addition, if the project contains more than 10 units of housing, the project seeking approval dedicates a minimum of 10 percent of the total number of units to housing affordable to households making below 80 percent of the area median income. If the locality has adopted a local ordinance that requires that greater than 10 percent of the units be dedicated to housing affordable to households making below 80 percent of the area median income, that zoning ordinance applies.*

        ii. *The locality did not submit its latest production report to the department by the time period required by Section 65400, or that production report reflects that there were fewer units of housing affordable to households making below 80 percent of the area median income that were issued building permits than were required for the regional housing needs assessment cycle for that reporting period, and the project seeking approval dedicates 50 percent of the total number of units to housing affordable to households making below 80 percent of the area median income, unless the locality has adopted a local ordinance that requires that greater than 50 percent of the units be dedicated to housing affordable to households making below 80 percent of the area median income, in which case that ordinance applies.*

        iii. *The locality did not submit its latest production report to the department by the time period required by Section 65400, or if the production report reflects that there were fewer units of housing affordable to any income level described in clause (i) or (ii) that were issued building permits than were required for the regional housing needs assessment cycle for that reporting period, the project seeking approval may choose between utilizing clause (i) or (ii).*

County analysis: On February 1, 2018, the California Department of Housing and Community Development ("HCD") released maps showing which cities and counties in

California are subject to streamlined housing development under SB 35. The information shows the County has not made sufficient progress in meeting the RHNA for the lower income categories. Therefore, the County is subject to SB 35.

Section 402(c) of the SB 35 Guidelines dated November 29, 2018 clarifies that "the percentage of units affordable to households making at or below 80 percent of the area median income… is calculated based on the total number of units in the development exclusive of additional units provided by a density bonus". Therefore, projects are required to provide 50 percent of the total (base density) for lower-income households to qualify under SB 35.

The applicant is required per the Conditions of Approval to record a covenant to the satisfaction of the County to make all the units in the development, except the manager's unit, affordable to households making at or below 80 percent area median income, which is equivalent to lower-income households per Health and Safety Code Section 50079.5. Therefore, the project meets the affordability requirements of SB 35.

5. *The development, excluding any additional density or any other concessions, incentives, or waivers of development standards granted pursuant to the Density Bonus Law in Section 65915, is consistent with objective zoning standards and objective design review standards in effect at the time that the development is submitted to the local government pursuant to this section. For purposes of this paragraph, "objective zoning standards" and "objective design review standards" mean standards that involve no personal or subjective judgment by a public official and are uniformly verifiable by reference to an external and uniform benchmark or criterion available and knowable by both the development applicant or proponent and the public official prior to submittal. These standards may be embodied in alternative objective land use specifications adopted by a County or county, and may include, but are not limited to, housing overlay zones, specific plans, inclusionary zoning ordinances, and density bonus ordinances, subject to the following:*

    a. *A development shall be deemed consistent with the objective zoning standards related to housing density, as applicable, if the density proposed is compliant with the maximum density allowed within that land use designation, notwithstanding any specified maximum unit allocation that may result in fewer units of housing being permitted.*

    b. *In the event that objective zoning, general plan, or design review standards are mutually inconsistent, a development shall be deemed consistent with the objective zoning standards pursuant to this subdivision if the development is consistent with the standards set forth in the general plan.*

County analysis: The project site is subject to the CWP's MF 4.5 (Multi-Family Residential, 11-40 units per acre) land use designation, and the City-Centered Corridor policies. This land use designation translates to a potential residential density range of 11.11 to 40.4 units for the subject property, given its size of 1.01 acres. The subject property is governed by the RMP – 34 (Residential, Multiple-family Planned District) zoning designation, which permits a maximum density of 34 dwelling units per acre. In instances where density allowed under the zoning ordinance is inconsistent with the density allowed under the Countywide Plan's land use element, the general plan density prevails under Government Code Section 65915(o)(2). Therefore, the project's base density is 41 units, as stipulated in the CWP.

The project is consistent with all relevant objective standards outlined in the Countywide Plan, zoning ordinance and the Multi-Family Design Guidelines. The project is also subject to the State Density Bonus law, an objective standard which uses a formula to calculate the maximum density increase for a site based on the number of low-income units provided by the project. The project is consistent with this objective standard as well. The applicant has requested three concessions and two waivers, as listed below:

Concessions

- Height: Relief from the requirement in Marin Development Code Section 22.10.040 for a building height increase from 30 feet to 56 feet eight inches;
- Windows: Relief from the requirement of the Multi-Family Design Guidelines Policy DG-20, for reduction of windows and fenestration from 25 percent to 21 percent; and
- Tree Canopies: Relief from the requirement of the Multi-Family Design Guidelines Policy DG-80, for a reduction in tree canopies from 25 percent to zero percent.

Waivers:

- Open space: Relief from the Multi-Family Design Guidelines Policy DG-29 to reduce the required open space from 7,400 square feet to 1,665 square feet; and
- Bicycle Parking: Relief from the Multi-Family Design Guidelines Policy DG-84, for reduction of bicycle storage from 37 to 30 spaces.

No other concessions, incentives or waivers of development standards are required or granted as part of the subject determination. The development, excluding any additional density or any other concessions, incentives, or waivers of development standards granted pursuant to the State Density Bonus Law is consistent with objective zoning and design review standards in effect at the time that the development was submitted to the County.

6. *The development is not located on a site that is any of the following:*
    a. *A coastal zone, as defined in Division 20 (commencing with Section 30000) of the Public Resources Code.*

County analysis: In this area, the coastal zone is west of the Marin City; the site is not within a coastal zone.

b. Either prime farmland or farmland of statewide importance, as defined pursuant to United States Department of Agriculture land inventory and monitoring criteria, as modified for California, and designated on the maps prepared by the Farmland Mapping and Monitoring Program of the Department of Conservation, or land zoned or designated for agricultural protection or preservation by a local ballot measure that was approved by the voters of that jurisdiction.

County analysis: The project site is not designated as prime farmland or farmland of statewide importance.

c. *Wetlands, as defined in the United States Fish and Wildlife Service Manual, Part 660 FW 2 (June 21, 1993).*

County analysis: There are no wetlands, as defined in the United States Fish and Wildlife Service Manual Part 660 FW 2, located within the Project site.

d. *Within a very high fire hazard severity zone, as determined by the Department of Forestry and Fire Protection pursuant to Section 51178, or within a high or very high fire hazard severity zone as indicated on maps adopted by the Department of Forestry and Fire Protection pursuant to Section 4202 of the Public Resources Code. This subparagraph does not apply to sites excluded from the specified hazard zones by a local agency, pursuant to subdivision (b) of Section 51179, or sites that have adopted fire hazard mitigation measures pursuant to existing building standards or state fire mitigation measures applicable to the development.*

County analysis: The site is within a very high fire hazard severity zone, as determined by the Department of Forestry and Fire Protection pursuant to Section 51178. However, the County has adopted fire hazard mitigation measures pursuant to existing building standards which will be imposed on the project. In addition, the project will feature fire mitigation measures, such as fire sprinklers throughout the development as well as fire rated exterior walls all round.

e. *A hazardous waste site that is listed pursuant to Section 65962.5 or a hazardous waste site designated by the Department of Toxic Substances Control pursuant to Section 25356 of the Health and Safety Code, unless the Department of Toxic Substances Control has cleared the site for residential use or residential mixed uses.*

County analysis: The Project site is not listed as a hazardous materials release site pursuant to Government Code Section 65962.5, or a hazardous waste site designated by the Department of Toxic Substances Control pursuant to Section 25356 of the Health and Safety Code.

f. *Within a delineated earthquake fault zone as determined by the State Geologist in any official maps published by the State Geologist, unless the development complies with applicable seismic protection building code standards adopted by the California Building Standards Commission under the California Building Standards Law (Part 2.5 (commencing with Section 18901) of Division 13 of the Health and Safety Code), and by any local building department under Chapter 12.2 (commencing with Section 8875) of Division 1 of Title 2.*

County analysis: While the Project site is not within a delineated earthquake fault zone as determined by the State Geologist, most of the Bay Area is near an earthquake fault zone. However, the project will comply with mandatory seismic protection standards contained in the adopted the California Building Code.

g. *Within a flood plain as determined by maps promulgated by the Federal Emergency Management Agency, unless the development has been issued a flood plain development permit pursuant to Part 59 (commencing with Section 59.1) and Part 60 (commencing with Section 60.1) of Subchapter B of Chapter I*

of Title 44 of the Code of Federal Regulations.

County analysis: The Project site is not within a mapped flood plain (it is within Zone X, the lowest flood risk zone) as determined by maps promulgated by the Federal Emergency Management Agency.

h. Within a floodway as determined by maps promulgated by the Federal Emergency Management Agency, unless the development has received a no-rise certification in accordance with Section 60.3(d)(3) of Title 44 of the Code of Federal Regulations.

County analysis: The Project site is within an area of minimal flood hazard (Zone X), which is not a floodway, as determined by maps promulgated by the Federal Emergency Management Agency.

i. Lands identified for conservation in an adopted natural community conservation plan pursuant to the Natural Community Conservation Planning Act (Chapter 10 (commencing with Section 2800) of Division 3 of the Fish and Game Code), habitat conservation plan pursuant to the federal Endangered Species Act of 1973 (16 U.S.C. Sec. 1531 et seq.), or other adopted natural resource protection plan.

County analysis: The Project site is not located within the boundaries of an adopted conservation plan.

j. Habitat for protected species identified as candidate, sensitive, or species of special status by state or federal agencies, fully protected species, or species protected by the federal Endangered Species Act of 1973 (16 U.S.C. Sec. 1531 et seq.), the California Endangered Species Act (Chapter 1.5 (commencing with Section 2050) of Division 3 of the Fish and Game Code), or the Native Plant Protection Act (Chapter 10 (commencing with Section 1900) of Division 2 of the Fish and Game Code).

County analysis: The Project site does not contain habitat for protected species identified as candidate, sensitive, or species of special status.

k. Lands under conservation easement.

County analysis: The Project site is not located within a conservation easement.

7. The development is not located on a site where any of the following apply:

a. The development would require the demolition of the following types of housing:

i. Housing that is subject to a recorded covenant, ordinance, or law that restricts rents to levels affordable to persons and families of moderate, low, or very low income.

ii. Housing that is subject to any form of rent or price control through a public entity's valid exercise of its police power.

iii. Housing that has been occupied by tenants within the past 10 years.

b. *The site was previously used for housing that was occupied by tenants that was demolished within 10 years before the development proponent submits an application under this section.*
c. *The development would require the demolition of a historic structure that was placed on a national, state, or local historic register.*
d. *The property contains housing units that are occupied by tenants, and units at the property are, or were, subsequently offered for sale to the general public by the subdivider or subsequent owner of the property.*

County analysis: The project site has not been identified as a historic resource by local, state or federal agencies. The project does not involve the demolition of a historic structure that was placed on a national, state or local historic register prior to the submission of the application. Furthermore, the site has been operated as a church lot for more than 10 years. Available records indicate that there were no residential units built on the site within the last 10 years.

8. *The development proponent has done both of the following, as applicable:*
    a. *Certified to the locality that either of the following is true, as applicable:*
        i. *The entirety of the development is a public work for purposes of Chapter 1 (commencing with Section 1720) of Part 7 of Division 2 of the Labor Code.*

        ii. *If the development is not in its entirety a public work, that all construction workers employed in the execution of the development will be paid at least the general prevailing rate of per diem wages for the type of work and geographic area, as determined by the Director of Industrial Relations pursuant to Sections 1773 and 1773.9 of the Labor Code, except that apprentices registered in programs approved by the Chief of the Division of Apprenticeship Standards may be paid at least the applicable apprentice prevailing rate. If the development is subject to this subparagraph, then for those portions of the development that are not a public work all of the following shall apply:*
            1. *The development proponent shall ensure that the prevailing wage requirement is included in all contracts for the performance of the work.*
            2. *All contractors and subcontractors shall pay to all construction workers employed in the execution of the work at least the general prevailing rate of per diem wages, except that apprentices registered in programs approved by the Chief of the Division of Apprenticeship Standards may be paid at least the applicable apprentice prevailing rate.*
            3. *Except as provided in subclause (V), all contractors and subcontractors shall maintain and verify payroll records pursuant to Section 1776 of the Labor Code and make those records available for inspection and copying as provided in therein.*
            4. *Except as provided in subclause (V), the obligation of the contractors and subcontractors to pay prevailing wages may be enforced by the Labor Commissioner through the issuance of a civil wage and penalty assessment pursuant to Section 1741 of the Labor Code, which may be reviewed pursuant to Section 1742 of the Labor Code, within 18 months after the completion of the development, by an underpaid worker through an administrative complaint or civil action, or by a joint labor-management committee though a civil action under Section 1771.2 of the Labor Code. If*

a civil wage and penalty assessment is issued, the contractor, subcontractor, and surety on a bond or bonds issued to secure the payment of wages covered by the assessment shall be liable for liquidated damages pursuant to Section 1742.1 of the Labor Code.

5. *Subclauses (III) and (IV) shall not apply if all contractors and subcontractors performing work on the development are subject to a project labor agreement that requires the payment of prevailing wages to all construction workers employed in the execution of the development and provides for enforcement of that obligation through an arbitration procedure. For purposes of this clause, "project labor agreement" has the same meaning as set forth in paragraph (1) of subdivision (b) of Section 2500 of the Public Contract Code.*
6. *Notwithstanding subdivision (c) of Section 1773.1 of the Labor Code, the requirement that employer payments not reduce the obligation to pay the hourly straight time or overtime wages found to be prevailing shall not apply if otherwise provided in a bona fide collective bargaining agreement covering the worker. The requirement to pay at least the general prevailing rate of per diem wages does not preclude use of an alternative workweek schedule adopted pursuant to Section 511 or 514 of the Labor Code.*

b. (i) *For developments for which any of the following conditions apply, certified that a skilled and trained workforce shall be used to complete the development if the application is approved:*

1. *On and after January 1, 2018, until December 31, 2021, the development consists of 75 or more units that are not 100 percent subsidized affordable housing and will be located within a jurisdiction located in a coastal or bay county with a population of 225,000 or more.*
2. *On and after January 1, 2022, until December 31, 2025, the development consists of 50 or more units that are not 100 percent subsidized affordable housing and will be located within a jurisdiction located in a coastal or bay county with a population of 225,000 or more.*
3. *On and after January 1, 2018, until December 31, 2019, the development consists of 75 or more units that are not 100 percent subsidized affordable housing and will be located within a jurisdiction with a population of fewer than 550,000 and that is not located in a coastal or bay county.*
4. *On and after January 1, 2020, until December 31, 2021, the development consists of more than 50 units and will be located within a jurisdiction with a population of fewer than 550,000 and that is not located in a coastal or bay county.*
5. On and after January 1, 2022, until December 31, 2025, the development consists of more than 25 units and will be located within a jurisdiction with a population of fewer than 550,000 and that is not located in a coastal bay county.
6. For purposes of this section, "skilled and trained workforce" has the same meaning as provided in Chapter 2.9 (commencing with Section 2600) of Part 1 of Division 2 of the Public Contract Code.
7. If the development proponent has certified that a skilled and trained workforce will be used to complete the development and the application is approved, the following shall apply:
8. The applicant shall require in all contracts for the performance of work that every contractor and subcontractor at every tier will individually use a

skilled and trained workforce to complete the development.

9. Every contractor and subcontractor shall use a skilled and trained *workforce to complete the development.*
10. *Except as provided in subclause (IV), the applicant shall provide to the locality, on a monthly basis while the development or contract is being performed, a report demonstrating compliance with Chapter 2.9 (commencing with Section 2600) of Part 1 of Division 2 of the Public Contract Code. A monthly report provided to the locality pursuant to this subclause shall be a public record under the California Public Records Act (Chapter 3.5 (commencing with Section 6250) of Division 7 of Title 1) and shall be open to public inspection. An applicant that fails to provide a monthly report demonstrating compliance with Chapter 2.9 (commencing with Section 2600) of Part 1 of Division 2 of the Public Contract Code shall be subject to a civil penalty of ten thousand dollars ($10,000) per month for each month for which the report has not been provided. Any contractor or subcontractor that fails to use a skilled and trained workforce shall be subject to a civil penalty of two hundred dollars ($200) per day for each worker employed in contravention of the skilled and trained workforce requirement. Penalties may be assessed by the Labor Commissioner within 18 months of completion of the development using the same procedures for issuance of civil wage and penalty assessments pursuant to Section 1741 of the Labor Code, and may be reviewed pursuant to the same procedures in Section 1742 of the Labor Code. Penalties shall be paid to the State Public Works Enforcement Fund.*
11. *Subclause (III) shall not apply if all contractors and subcontractors performing work on the development are subject to a project labor agreement that requires compliance with the skilled and trained workforce requirement and provides for enforcement of that obligation through an arbitration procedure. For purposes of this subparagraph, "project labor agreement" has the same meaning as set forth in paragraph (1) of subdivision (b) of Section 2500 of the Public Contract Code.*
12. *Notwithstanding subparagraphs (A) and (B), a development that is subject to approval pursuant to this section is exempt from any requirement to pay prevailing wages or use a skilled and trained workforce if it meets both of the following:*
    i. *The project includes 10 or fewer units.*
    ii. *The project is not a public work for purposes of Chapter 1 (commencing with Section 1720) of Part 7 of Division 2 of the Labor Code.*

County analysis: The applicant has submitted a letter committing to providing prevailing wages as required for a project that is not a public work. Conditions of approval require the applicant provide documentation prior to issuance of a building permit, to demonstrate compliance with this requirement.

9. *The development did not or does not involve a subdivision of a parcel that is, or, notwithstanding this section, would otherwise be, subject to the Subdivision Map Act (Division 2 (commencing with Section 66410)) or any other applicable law authorizing the subdivision of land, unless either of the following apply:*

a. *The development has received or will receive financing or funding by means of a low-income housing tax credit and is subject to the requirement that prevailing wages be paid pursuant to subparagraph (A) of paragraph (8).*
b. *The development is subject to the requirement that prevailing wages be paid, and a skilled and trained workforce used, pursuant to paragraph (8).*

County analysis: The development will not involve a subdivision of a parcel. However, the development has received or will receive financing or funding by means of a low-income housing tax credit. Therefore, the development is subject to the requirement that prevailing wages be paid, and a skilled and trained workforce used, pursuant to paragraph (8). A condition of approval requires the applicant provide documentation prior to issuance of a building permit, to demonstrate compliance with this requirement.

10. *The development shall not be upon an existing parcel of land or site that is governed under the Mobilehome Residency Law (Chapter 2.5 (commencing with Section 798) of Title 2 of Part 2 of Division 2 of the Civil Code), the Recreational Vehicle Park Occupancy Law (Chapter 2.6 (commencing with Section 799.20) of Title 2 of Part 2 of Division 2 of the Civil Code), the Mobilehome Parks Act (Part 2.1 (commencing with Section 18200) of Division 13 of the Health and Safety Code), or the Special Occupancy Parks Act (Part 2.3 (commencing with Section 18860) of Division 13 of the Health and Safety Code).*

County analysis: The project is not on a site governed by these laws.

Additionally, Government Code Section 65913.4(d) states that "[n]otwithstanding any other law, a local government, whether or not it has adopted an ordinance governing parking requirements in multifamily developments, shall not impose parking standards for a streamlined development that was approved pursuant to this section in any of the following instances:

a. *The development is located within one-half mile of public transit.*
b. *The development is located within an architecturally and historically significant historic district.*
c. *When on-street parking permits are required but not offered to the occupants of the development.*
d. *When there is a car share vehicle located within one block of the development.*

County analysis: The project site is located less than half a mile from a public bus stop. As such, the County cannot impose parking standards for the proposed SB-35 project as it would be contrary to the law.

CONCLUSION:

The preponderance of the evidence in the record demonstrates that the project complies with the requirements of Government Code Section 65913.4 and that there are no objective inclusionary or exclusionary standards that would disqualify the project from a streamlined, ministerial review process. The proposed development consists of "a multi-family housing development that contains two or more residential units" in an urban area that will not displace existing rent-controlled and income-restricted housing. (§ 65913.4, subds. (a)(1)—(2), (a)(7).) None of the exclusionary criteria apply to the proposed development in that it is not located in or on a coastal zone, flood plain,

earthquake fault zone, hazardous-waste site, wetland, or prime farmland. (§ 6591 3.4, subd. (a)(6).) While the property is located in a high fire severity zone, the development will comply with fire hazard mitigation allowable under SB35. Therefore, as provided above, the development satisfies all of the objective planning standards of Government Code Section 65913.4(a), and is therefore subject to the streamlined, ministerial approval process provided in Government Code Sections 65913.4(b) and (c).

In issuing this Approval, Government Code Section 65913.4 prohibits the County from conducting public hearings or discretionary architectural or design review.

ACTION

The project described in condition of approval 1 below is authorized by the Marin County Planning Division and is subject to the conditions of project approval.

This decision certifies the proposed project's conformance with the requirements of the Marin County Development Code and in no way affects the requirements of any other County, State, Federal, or local agency that regulates development. In addition to a Building Permit, additional permits and/or approvals may be required from the Department of Public Works, the appropriate Fire Protection Agency, the Environmental Health Services Division, water and sewer providers, Federal and State agencies.

CONDITIONS OF PROJECT APPROVAL

CDA-Planning Division

1. This Zoning Compliance Review approval authorizes the demolition of an existing 9,750 square foot church and construction of a new 73,793 square foot multi-family apartment building on a lot in Marin City. The project would entail the construction of a five-story, 56 feet eight inches tall, residential building with 74 units restricted to lower-income households, as defined in Health and Safety Code § 50079.5, a manager's office, residential amenities, and 24 on-site parking spaces. Exterior walls would be set back 13 feet four inches from the south front property line; 28 feet two inches from the east side property line; six feet nine inches from the west side property line; and 42 feet one inch from the north rear property line. The 74 units are comprised of 24 one-bedroom units, 42 two-bedroom units, and eight three-bedroom units.

   The removal of one tree, classified as "heritage" per the Marin County Development Code section 22.62.020 is proposed. Proposed landscaping includes various perennial shrubs, ground covers, grass, stormwater management plantings, and trees including three Coastal Live Oak (Quercus agrifolia), five Monterey Cypress (Hesperocyparis macrocarpa), seven Desert Museum Pal Verde (Parkinsonia), Western Redbud (Cercis occidentalis).

   Various site improvements would also be entailed in the proposed development, including a new retaining wall that would be 13 feet five inches high, new driveways, secure storage for 30 bicycles, and general site improvements to accommodate the proposed project.

2. Plans submitted for a Building Permit shall substantially conform to plans identified as Exhibit A, entitled "825 Drake Avenue," consisting of 24 sheets prepared by Kodama Diseno Architecture, received in final form on August 12, 2020, and on file with the Marin County Community Development Agency, except as modified by the conditions listed herein.

3. Except as specified herein, the site plan, floor plans, building elevations and/or any additional information or representations, indicating the proposed structure or manner of operation submitted with an application or during the approval process are deemed conditions of approval.

4. BEFORE ISSUANCE OF A BUILDING PERMIT, the applicant shall modify the project to conform to the following requirements:

    a. The conditions of this Permit shall be printed on the second sheet of each plan set submitted for a building permit pursuant to this Zoning Compliance Review, under the title 'Zoning Compliance Review Conditions.' Additional sheets may also be used if the second sheet is not of sufficient size to list all of the conditions. The sheet(s) containing the conditions shall be of the same size as those sheets containing the construction drawings; 8-1/2" by 11" sheets are not acceptable.

5. The project shall reserve all the units in the development, with the exception of the manager's unit, for lower income households, as defined in Health and Safety Code §50079.5. A deed restriction shall be recorded prior to issuance of a Certificate of Occupancy.

6. BEFORE ISSUANCE OF A BUILDING PERMIT, the applicant shall enter into a Regulatory Agreement with an Affirmative Marketing Plan, as prepared by the County and paid for by the applicant. The agreement shall comply with applicable requirements in Chapter 22.22 of the Marin County Code. The Agreement shall acknowledge that the project would consist of rental units that are income-restricted in perpetuity, unless the applicant can demonstrate that a shorter period is required by State or Federal financing sources. If the rental housing units are limited to a term of less than perpetuity, the applicant shall provide inclusionary units as required by the Marin County Code at the termination of the period of affordability. The units shall be offered at an affordable rent not exceeding 30 percent of the gross income of households earning at most 50 percent of Area Median Income, adjusted for household sizes. The rental prices shall be established by the County or its designee and shall be based on the number of bedrooms. See Marin County Development Code Article VIII for definitions of Affordable Rent and Area Median Income.

    The agreement shall specify provisions for income certification and screening of potential renters of units, and specify resale control mechanisms, including the financing of ongoing administrative and monitoring costs, and comply with the requirements of Marin County Code Section 22.22.120.C. In addition, the following provisions shall apply:

    a. Maximum rent shall be adjusted for the family size appropriate for the unit pursuant to California Health & Safety Code Section 50052.5 (h);

    b. Rent shall include a reasonable allowance for utilities, as published and updated by the Housing Authority, including garbage collection, sewer, water, electricity, gas, and other heating, cooking and refrigeration fuels. Such allowance shall take into account the cost of an adequate level of service. Utilities do not include telephone service. Rent also includes any separately charged fees or service charges assessed by the lessor which are required of all tenants, other than security deposits; and

    c. The income restrictions shall run with the land.

7. BEFORE ISSUANCE OF A BUILDING PERMIT, the applicant shall present the Community Development Director with a recorded document evidencing that American Baptist Church of the West has released or terminated its right of reverter with respect to the subject property.

8. In accordance with Gov. Section 65913.4(a)(8), the applicant shall certify to the County and shall provide the following documentation prior to issuance of a building permit:

    a. A signed Preconstruction Checklist Agreement between the Applicant and the contractor and subcontractors, (maintained in the case file), prior to clearing any Building Permit, which covers the following:

        i. All construction workers employed in the execution of the development will be paid at least the general prevailing rate of per diem wages for the type of work and geographic area, as determined by the Director of Industrial Relations pursuant to Sections 1773 and 1773.9 of the California Labor Code, except that apprentices registered in programs approved by the Chief of the Division of Apprenticeship Standards shall be paid at least the applicable apprentice prevailing rate.

        ii. The development proponent shall ensure that the prevailing wage requirement is included in all contracts for the performance of the work.

        iii. All contractors and subcontractors shall pay to all construction workers employed in the execution of the work at least the general prevailing rate of per diem wages, except that apprentices registered in programs approved by the Chief of the Division of Apprenticeship Standards shall be paid at least the applicable apprentice prevailing rate.

        iv. Except as provided in subclause (vi), all contractors and subcontractors shall maintain and verify payroll records pursuant to Section 1776 of the Labor Code and make those records available for inspection and copying as provided in Sections 1776 and 1812 of the Labor Code.

        v. Except as provided in subclause (vi), the obligation of the contractors and subcontractors to pay prevailing wages may be enforced by the Labor Commissioner through the issuance of a civil wage and penalty assessment pursuant to Section 1741 of the Labor Code, which may be reviewed pursuant to Section 1742 of the Labor Code, within 18 months after the completion of the development, by an underpaid worker through an administrative complaint or civil action, or by a joint labor management committee though a civil action under Section 1771.2 of the Labor Code. If a civil wage and penalty assessment is issued, the contractor, subcontractor, and surety on a bond or bonds issued to secure the payment of wages covered by the assessment shall be liable for liquidated damages pursuant to Section 1742.1 of the Labor Code.

        vi. Subclauses (iv) and (v) shall not apply if all contractors and subcontractors performing work on the development are subject to a project labor agreement that requires the payment of prevailing wages to all construction workers employed in the execution of the development and provides for enforcement

of that obligation through an arbitration procedure. For purposes of this clause, “project labor agreement” has the same meaning as set forth in paragraph (1) of subdivision (b) of Section 2500 of the Public Contract Code.
vii. Notwithstanding subdivision (c) of Section 1773.1 of the Labor Code, the requirement that employer payments not reduce the obligation to pay the hourly straight time or overtime wages found to be prevailing shall not apply if otherwise provided in a bona fide collective bargaining agreement covering the worker. The requirement to pay at least the general prevailing rate of per diem wages does not preclude use of an alternative workweek schedule adopted pursuant to Section 511 or 514 of the Labor Code.

vii. Bond. A Bond may be required to ensure compliance.

9. The project shall conform to the Planning Division’s “Uniformly Applied Conditions 2020” with respect to all of the standard conditions of approval. The applicant/owner shall recognize that “County of Marin,” as referenced in the 2020 Standard Condition #2, includes the County of Marin as Successor Agency to the Marin County Redevelopment Agency.

VESTING

Unless conditions of approval establish a different time limit or an extension to vest has been granted, any permit or entitlement not vested within three years of the date of the approval shall expire and become void. The permit shall not be deemed vested until the permit holder has actually obtained any required Building Permit or other construction permit and has substantially completed improvements in accordance with the approved permits, or has actually commenced the allowed use on the subject property, in compliance with the conditions of approval.

cc: *{Via email to County departments}*
CDA – Planning Manager and Assistant Director
DPW – Land Development (Attn: Berenice Davidson)
DPW – Land Development (Attn: Alicia Stamps)

Attachments:

1. Marin County Uniformly Applied Standards 2020
2. Sausalito-Marin City Sanity District, June 3, 2020
3. Marin County Fire Department, dated August 31, 2020
4. Marin Municipal Water District, dated June 11, 2020

Back (https://publicworks.marincounty.org/compliance-and-standards/)
Labor Compliance (https://publicworks.marincounty.org/labor-compliance/)
Uniform construction standards (https://publicworks.marincounty.org/uniform-construction-standards/)

Marin County Uniform Construction Standards

Developed by the Marin Public Works Association, an organization of engineers representing the County of Marin and the towns/cities across the County, the Uniform Construction Standards (UCS) of all cities/towns and the County of Marin ensures consistency for construction and other improvements in the roadway. The UCS are updated from time to time and contractors should make sure they are using the most current standards.

2018 Marin County UCS
(https://publicworks.marincounty.org/documents/2018-marin-county-uniform-construction-standards/)

Caltrans Engineering Services (ES)

Caltrans Division of Design (https://dot.ca.gov/programs/design) provides policies, procedures, guidance, technical assistance, training and equipment needed to develop and maintain a safe, sustainable, integrated and efficient transportation system. Caltrans Assist in the application of design standards and practices to facilitate the resolution of project development issues.

2018 coded checklist items
(https://dot.ca.gov/programs/design/ccs-coded-items)

2018 standard plans and standard specifications
(https://dot.ca.gov/programs/design/ccs-standard-plans-and-standard-specifications)

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Accessibility (https://www.marincounty.org/main/accessibility)

If you are a person with a disability and require an accommodation to participate in a County program, service, or activity, requests may be made by calling (415) 473-4381 (Voice), Dial 711 for CA Relay, or by email (/disability-access-contact-form/) at least five business days in advance of the event. We will do our best to fulfill requests received with less than five business days' notice. Copies of documents are available in alternative formats upon request.

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MARIN COUNTY SHERIFF'S OFFICE

(/)

ABOUT US

The Marin County Sheriff's Office is divided into three major bureaus; Administrative and Support Services (http://www.marinsheriff.org/about-us/administrative-support), Detention Services (http://www.marinsheriff.org/about-us/detention-bureau), and Field Services (http://www.marinsheriff.org/about-us/field-service-bureau) in addition to operating the countywide Major Crime Task Force (http://www.marinsheriff.org/about-us/major-crimes-task-force). The responsibilities of the Sheriff's Office Bureaus include maintaining the county jail, providing security to the Superior Court, operating a countywide communications division, operating a documentary services division consisting of records, warrants, civil units, and more.

Marin County, which is located immediately North of the Golden Gate bridge in the San Francisco Bay Area is the gateway to the North Bay. Much of Marin's 521 square miles is unincorporated and therefore the crime prevention and law enforcement responsibility of the Marin County Sheriff.

MCSO ORG CHART (/ASSETS/DOWNLOADS/MCSO_ORG_CHART.PDF)

MARIN COUNTY SHERIFF'S OFFICE

(/)

The Marin County Sheriff's Office is committed to partnering with our communities to provide leadership and excellence in public safety

SWORN DEPUTIES

OTHER LAW ENFORCEMENT PROFESSIONALS

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BUDGET

The services we provide and how we provide them is critical to the success of our mission. It is important that we work closely with the community and other service organizations in identifying and solving the problems facing us. We can say confidently that the Marin County Sheriff's Office is committed to quality service through our Community Policing Programs.

It is important, as we charge into the twenty-first century, that we are careful to measure community needs and help create and support successful [illegible]tions with the smallest degree of intrusiveness necessary. It is, however, [illegible]ur belief that we can work together in order to deter crimes in our community, especially the troublesome ones, such as domestic violence and hate crimes. It is through the consistent practice of honest communication and interaction with the community that our partnership will be effective.

Sheriff Robert T. Doyle
Marin County Sheriff's Office

Have what it takes? Join Us

(/join-us)

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In Memoriam (http://www.marinsheriff.org/about-us/in-memoriam)

SERVICES (HTTP://WWW.MARINSHERIFF.ORG/SERVICES)

MARIN COUNTY SHERIFF'S OFFICE

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//www.marinsheriff.org/services/emergency-services)

Civil (http://www.marinsheriff.org/services/civil)

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Records (http://www.marinsheriff.org/services/records)

Warrants (http://www.marinsheriff.org/services/warrants)

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1600 Los Gamos Dr. #200 San Rafael, CA 94903

P (Phone Number) (415) 473-7250

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Proposed June 2023 Service Changes

17 Downtown San Rafael – Sausalito

via Strawberry, Mill Valley

Service Alerts

see service alerts for all routes

17 Route 17 Southbound Cancelation

Effective Tue, Feb 14, 2023

17 Route 17 Northbound Cancelations

Effective Tue, Feb 14, 2023

Schedules

PRINTABLE PDF

SERVICE DIRECTION

NORTHBOUND
SAUSALITO → SAN RAFAEL

SOUTHBOUND
SAN RAFAEL → SAUSALITO

DAYS OF WEEK

MON-FRI | SAT | SUN/HOLIDAY

Northbound, Monday - Friday

Sausalito → San Rafael

Bay St & Bridgeway	Marin City Hub	Drake Av & Cole Dr	Tam Junction-Shoreline Hwy & Almonte Blvd	Miller Ave & Camino Alto	Mill Valley Depot-Sunnyside Ave & Miller Ave	E Blithedale Ave & Kipling Dr	Reed Blvd & Belvedere Dr	Hwy 101 @ Tiburon Wye Bus Pad	Hwy 101 @ Paradise Dr Bus Pad	Hwy 101 @ Lucky Dr Bus Pad	E Sir Francis Drake Blvd & Larkspur Landing	San Rafael Transit Center
6:40am	6:50am	--	6:56am	7:00am	7:05am	7:12am	--	--	7:16am	7:18am	--	7:25am
7:05am	7:15am	--	7:21am	7:26am	7:32am	7:40am	--	--	7:45am	7:47am	--	7:55am
7:30am	7:40am	--	7:46am	7:51am	7:57am	8:07am	--	--	8:12am	8:14am	--	8:25am
7:54am	8:02am	8:05am	8:14am	8:21am	8:27am	8:39am	--	--	8:43am	8:45am	--	8:55am
8:59am	9:09am	--	9:15am	9:19am	9:24am	9:36am	--	--	9:41am	9:43am	--	9:55am
9:29am	9:39am	--	9:45am	9:49am	9:54am	10:06am	--	--	10:11am	10:13am	--	10:25am
10:29am	10:39am	--	10:45am	10:49am	10:54am	11:06am	--	--	11:11am	11:13am	--	11:25am
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Bay St & Bridgeway	Marin City Hub	Drake Av & Cole Dr	Tam Junction-Shoreline Hwy & Almonte Blvd	Miller Ave & Camino Alto	Mill Valley Depot-Sunnyside Ave & Miller Ave	E Blithedale Ave & Kipling Dr	Reed Blvd & Belvedere Dr	Hwy 101 @ Tiburon Wye Bus Pad	Hwy 101 @ Paradise Dr Bus Pad	Hwy 101 @ Lucky Dr Bus Pad	E Sir Francis Drake Blvd & Larkspur Landing	San Rafael Transit Center
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-- = No service at this stop

See Marin Transit Holiday Schedule

PM times are indicated in **bold type**

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Stops

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Housing Element Update 6th Cycle 2023-2031

Marin Countywide Plan

Adopted January 24, 2023

COUNTY OF MARIN

MIG

VT+A
VERONICA TAM AND ASSOCIATES

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CHAPTER 1: INTRODUCTION

Housing Element Overview and Purpose

Overview

Marin County offers varied and attractive residential environments due to its unique combination of natural beauty and proximity to San Francisco. However, many low and moderate income households struggle to afford housing and are impacted by low vacancy rates, escalating housing prices and rents and limited availability of affordable housing options. Lack of affordable housing is consistently ranked as a major issue for residents.

State housing and planning laws require all California cities and counties include in their General Plan a housing element that establishes objectives, policies, and programs in response to community housing conditions and needs. The Housing Element is required to be updated periodically according to the statutory deadline set forth in the Government Code (Section 65580). This Housing Element update for the County of Marin represents the 6th update cycle, covering an eight-year planning period from January 31, 2023 through January 31, 2031. This Housing Element has been prepared to satisfy this mandate and local needs by evaluating and addressing housing needs in the unincorporated area of Marin County during the planning period.

The 2007 Marin Countywide Plan (the County's general plan), into which this Housing Element will be incorporated, is based on the principal of sustainability, which is defined as aligning our built environment and socioeconomic activities with the natural systems that support life. The Countywide Plan focuses on the principles of a sustainable community: Environment, Economy, and Equity. Consistent with this focus, the primary objective of the Marin County Housing Element is to plan equitably and environmentally sustainable communities by supplying housing affordable to the full range of our diverse community and workforce. The approach of this Housing Element is to focus on the following areas:

Goal 1: Use Land Efficiently

Use Marin's land efficiently to meet housing needs and implement smart and sustainable development principles.

Goal 2: Meet Housing Needs through a Variety of Housing Choices

Respond to the broad range of housing needs in Marin County by supporting a mix of housing types, densities, designs and affordability levels.

Goal 3: Ensure Leadership and Institutional Capacity

Build and maintain local government institutional capacity and monitor accomplishments to respond to housing needs effectively over time.

Goal 4: Combat Housing Discrimination, Eliminate Racial Bias, Undo Historic Patterns of Segregation

Lift barriers that restrict access in order to foster inclusive communities and achieve racial equity, fair housing choice, and opportunity for all local workers and current and future residents of Marin.

Purpose

The purpose of the Housing Element is to offer an adequate supply of decent, safe, and affordable housing for the unincorporated County residents, special needs populations, and workforce. The Housing Element assesses housing needs for all income groups and lays out a plan of actions to meeting these needs. Housing affordability in Marin County and in the Bay Area as a whole has become increasingly important as climate change issues are addressed. The built environment and commute patterns are major contributors to greenhouse gas emissions. The overall goal of the Housing Element is to present goals, objectives, policies, and actions to facilitate housing for existing and future needs.

The Housing Element is divided into five chapters:

Chapter 1: Introduction contains introductory material and an overview of State law requirements for housing elements

Chapter 2: Housing Needs Analysis contains an analysis of housing needs

Chapter 3: Housing Constraints contains a detailed analysis of governmental and non-governmental constraints to housing development

Chapter 4: Housing Resources summarizes the County resources in addressing housing needs, especially capacity for residential development

Chapter 5: Housing Plan contains housing goals and objectives, policies, and implementation programs.

In addition, several appendices provide technical details that supplement the information contained in the Housing Element:

Appendix A: Community Outreach provides a summary of the extensive community outreach efforts conducted

Appendix B: Review of the 2015 Housing Element

Appendix C: Sites Inventory

Appendix D: Affirmatively Furthering Fair Housing

Housing Element Law

Overview

Enacted in 1969, State housing element law mandates that local governments adequately plan to meet the existing and projected housing needs of all economic segments of the community. The law acknowledges that in order for the private market to adequately address housing needs and demand, local governments must adopt land use plans and regulatory systems that provide opportunities for, and do not unduly constrain, housing development.

Unlike the other State-mandated general plan elements, the housing element is subject to detailed statutory requirements regarding its content, and is subject to mandatory review by the California Department of Housing and Community Development (HCD). The housing element must also be updated every eight years, unlike other general plan elements. According to State law, the statutory due date to update the housing element for the 2023-2031 planning period is January 31, 2023.

State law requires that the housing element contain the following information:

- An analysis of population and employment trends and documentation of projections and a quantification of the existing and projected housing needs for all income levels, including extremely low income households.
- An analysis and documentation of household characteristics, including level of payment compared to ability to pay, housing characteristics, including overcrowding, and housing stock condition.
- An inventory of land suitable and available for residential development, including vacant sites and sites having realistic and demonstrated potential for redevelopment during the planning period.
- The identification of a zone or zones where emergency shelters are allowed as a permitted use without a conditional use or other discretionary permit.
- An analysis of potential and actual governmental and non-governmental constraints upon the maintenance, improvement, or development of housing for all income levels.
- An analysis of any special housing needs, such as those of the elderly; persons with disabilities, including a developmental disability; large families; farmworkers; families with female heads of households; and families and experiencing homelessness.
- An analysis of opportunities for energy conservation.
- An analysis of existing assisted housing developments that are eligible to change

from low-income housing uses during the next 10 years.

- A statement of the community's goals, quantified objectives, and policies relative to affirmatively furthering fair housing and to the maintenance, preservation, improvement, and development of housing.

The housing element establishes an action plan that details the actions, or programs, that will implement the goals and policies. For each program, the action plan must identify the agency responsible and the timeframe for implementation. The County's housing objectives and primary areas of housing need are outlined in the four main goals of this Housing Element.

Preparation of the Housing Element Update

The housing element must identify community involvement and decision-making processes and techniques that constitute affirmative steps for obtaining input from all socioeconomic segments of the community, especially low income persons, as well as those historically excluded from decision making and households with special needs. A summary of the community outreach process and outcomes is provided in Appendix A of this Housing Element. Key findings include:

Housing Supply

- Increased need for affordable units and housing types beside single unit homes.
- Difficulties in finding and retaining housing, particularly for members of populations protected under fair housing laws[1].
- Prospect of leaving the County, for both renters and homeowners, to find housing that is affordable and meets household needs.

Infrastructure

- Limited infrastructure capacity to support more housing development.
- Insufficient clean water and septic infrastructure.
- Insufficient evacuation capacity and ingress/egress for emergency vehicles.
- Insufficient infrastructure for pedestrians and bicyclists.

In response to these comments, this Housing Element introduces programs to expand and preserve the County's affordable housing inventory, to create a diverse range of housing choices, and to mitigate infrastructure constraints.

[1] California fair housing laws prohibit discrimination *because of* race, color, national origin, religion, sex, familial status, disability/medical conditions, source of income, sexual orientation, marital status, age, immigration status, arbitrary characteristics and gender identity and expression.

Relationship of the Housing Element to Other Countywide Plan Elements

The Countywide Plan serves as the constitution for land use in the unincorporated portions of Marin County. This long-range planning document describes goals, policies, and programs to guide land use decision-making. State law requires a community's general plan to be internally consistent. This means that the housing element, although subject to special requirements and a different schedule of updates, must function as an integral part of the overall general plan, with consistency between it and the other general plan elements. Once the general plan is adopted, all development-related decisions in unincorporated areas must be consistent with the plan. If a development proposal is not consistent with the plan, the proposal must be revised or the plan itself must be amended. To maintain internal consistency, any proposed amendments to other elements of the general plan and to the development code are reviewed for consistency with the housing element in advance of adoption by the Board of Supervisors. If a proposed amendment is not consistent with the Housing Element, then the proposed amendment is revised or expanded as needed to maintain consistency.

The updated Countywide Plan is structured around the goal of building sustainable communities. Each of the three other elements in the Plan addresses sustainability: the Natural Systems and Agriculture Element, the Built Environment Element, and the Socioeconomic Element. The Marin Countywide Plan Update Guiding Principles related to housing are excerpted below.

- Supply housing affordable to the full range of our workforce and diverse community. We will provide and maintain well designed, energy efficient, diverse housing close to job centers, shopping, and transportation links. We will pursue innovative opportunities to finance senior, workforce, and special needs housing, promote infill development, and reuse and redevelop underutilized sites.
- Provide efficient and effective transportation. We will expand our public transportation systems to better connect jobs, housing, schools, shopping, and recreational facilities. We will provide affordable and convenient transportation alternatives that reduce our dependence on single occupancy vehicles, conserve resources, improve air quality, and reduce traffic congestion.
- Foster businesses that create economic, environmental, and social benefits. We will retain, expand, and attract a diversity of businesses that meet the needs of our residents and strengthen our economic base. We will partner with local employers to address transportation and housing needs.

There are over 20 community areas in the unincorporated area, all of which have adopted community or special area plans. These plans further detail the policies of the Countywide Plan as they pertain to specific areas. Policies contained in the community and special area plans, including those related to housing, must be consistent with those

in the Countywide Plan, and, by extension, its Housing Element. The following is a list of community and special area plans and the date of their last adopted/amended plan.

- Black Point (2016)
- Bolinas (1978)
- Bolinas Gridded Mesa (1984)
- Dillon Beach (1989)
- East Shore (Tomales Bay) (1997)
- Green Point (2016)
- Indian Valley (2003)
- Inverness Ridge (1983)
- Kentfield/Greenbrae (1987)
- Kent Woodlands (1995)
- Marin City (1992)
- Muir Beach (1972)
- Paradise Drive (1999)
- Paradise Ranch Estates Restoration Plan (1981)
- Point Reyes Station (2001)
- Point San Quentin Village (1985)
- Richardson Bay (1984)
- San Geronimo Valley (1997)
- Santa Venetia (2017)
- Strawberry (1973) (1982)
- Stinson Beach (1985)
- Tamalpais (1992)
- Tomales (1997)

Many of these existing plans contains goals, policies, and programs that are not consistent with the Countywide Plan (CWP). When inconsistencies exist, the CWP prevails. Concurrent with the Housing Element update, the CWP Land Use and Safety Elements are also being amended to designate additional areas for residential development and to address new State law requirements. In the future, as other elements of the CWP are being updated, the County will review the Housing Element for internal consistency.

Public Participation

The County implemented a comprehensive public participation program to obtain input from all socioeconomic segments of the unincorporated County, with a focus on including people of color and special needs populations. A detailed summary of the public participation program and outcomes is provided in Appendix A. In direct response to public input received during the development of the Draft Housing Element, these new programs have been included in the 2023-2031 Housing Element (see

Section 5: Housing Plan):

- Program 5: SB 9 Mapping Tool
- Program 7: Religious and Institutional Facility Housing Overlay
- Program 17: Housing for Seniors
- Program 18: Short-Term Rentals
- Program 31: Tenant Protection Strategies
- Program 33: Community Engagement

The Draft Housing Element was available for public review on June 2, 2022. On June 14, 2022, a joint session was conducted with the Board of Supervisors and Planning Commission to review the Draft Housing Element and to receive public input.

During the 30-day public review of the Draft Housing Element, the County received comments from residents, property owners, and the following agencies and organizations with an interest in housing:

- Age Forward
- Canal Alliance
- Community Action Marin
- Community Land Trust of West Marin (CLAM)
- Early Care and Education
- Fair Housing Advocates of Northern California
- Habitat for Humanity Greater San Francisco
- Housing Crisis Action
- Legal Aid of Marin
- Marin Conservation League
- Marin Organizing Committee
- North Marin Community Services

A detailed summary of public comments received during the 30-day review of the Draft Housing Element is available on the County's website. Below is a brief summary of comments received and the County's responses.

The Draft Housing Element was submitted to HCD on July 19, 2022, and the County received HCD's comments on October 17, 2022. This Draft Housing Element was revised to address HCD comments.

Table H-1.1: Summary of Comments and Responses

Comment Theme	Responses
Concerns relating to the Regional Housing Needs Assessment (RHNA).	RHNA is a State mandate and the County must comply with State law by planning for the full RHNA. Program 33: Community Engagement has been expanded to include a component to educate the public about the need for and benefits of additional housing.
Concerns relating to environmental and infrastructure constraints such as fire hazards, traffic, schools, recreation, and septic and water use.	Development of the sites inventory for RHNA took into consideration potential environmental and infrastructure constraints. As part of the EIR being prepared for the Housing and Safety Elements, the County has addressed these issues and identified mitigation measures as appropriate. The Housing Element also includes programs to address water and sewer capacity (see Program 11: Water Availability and Program 12: Septic for Multi-Unit Housing).
Additional housing opportunities, especially affordable housing at locations along transit corridors. Stronger emphasis should be placed on extremely low income households, and housing appropriate for families with children.	Development of the sites inventory took into consideration declining retail uses and access to transit. The Housing Element also proposes a number of programs to enhance housing affordability: ▪ Program 15: Housing for Farmworkers and Hospitality Workers ▪ Program 16: Project Homekey ▪ Program 17: Housing for Seniors ▪ Program 24: Inclusionary Housing ▪ Program 25: Incentives for Affordable Housing ▪ Program 26: Below Market Rate (BMR) Homeownership Program ▪ Program 27: Community Land Trust ▪ Program 28: Affordable Housing Funding Sources Most programs that benefit lower income households include extremely low income households. Program 25: Incentives for Affordable Housing has been revised to encourage housing with child care facilities. Several programs also aim to assist seniors to age in place or age in community. These included: ▪ Program 13: Reasonable Accommodation ▪ Program 14: Universal Design and Visitability ▪ Program 17: Housing for Seniors

Table H-1.1: Summary of Comments and Responses

Comment Theme	Responses
	▪ Program 21: Rehabilitation Assistance
Facilitate the development of housing for the education workforce.	Program 7: Religious and Institutional Facility Housing Overlay address housing on school and hospital properties.
Specific property owners and members of the public commented on the intention to continue the existing uses.	The County adjusted the sites inventory to reflect comments on specific sites and to provide supplemental information requested, as feasible.
Strengthen the efforts to enhance affordability by reducing risk and costs of development; using land efficiently; upzoning additional properties; expanding scope of by-right approval; and removing discriminatory language in zoning and land use policies, etc.	All these efforts are included in the Draft Housing Element. Specific programs include: ▪ Program 1: Adequate Sites for RHNA and Monitoring of No Net Loss ▪ Program 2: By Right Approval ▪ Program 4: Accessory Dwelling Units ▪ Program 5: SB 9 Mapping Tool ▪ Program 6: Efficient Use of Multi-Unit Land ▪ Program 7: Religious and Institutional Facility Housing Overlay ▪ Program 32: Comprehensive Review of Zoning and Planning Policies Program 6: Efficient Use of Multi-Unit Land was revised to specify the rounding up to the whole number in calculating density.
Accessory Dwelling Units represent an important source for affordable housing. Pre-approved plans can save pre-development costs for homeowners. In affluent communities, ADUs are often not occupied as housing units.	Program 4: Accessory Dwelling Units was revised to include an action to develop pre-approved plans. Program 4: Accessory Dwelling Units and Program 19: Vacant Home Tax were revised to include actions related to encouraging the use of ADUs as housing units.
Affordable homeownership offers unique intergenerational and community benefits and helps bridge the growing racial wealth gap. The County should set a meaningful target for affordable homeownership opportunities.	Program 25: Incentives for Affordable Housing, which works hand-in-hand with Program 28: Affordable Housing Funding Sources, was revised to a goal of 300 affordable units to lower income households. Program 26: Below Market Rate (BMR) Homeownership was revised to include a component to pursue additional funding to assist with homeownership.

Table H-1.1: Summary of Comments and Responses

Comment Theme	Responses
Tenant protection policies should be strengthened, and fair housing related actions should be moved up in timeline.	Program 31: Tenant Protection Strategies has been expanded to include specific actions to the extent feasible. Timeline for Program 32: Comprehensive Review of Zoning and Planning Policies has been moved up. Program 33: Community Engagement has been expanded to include a regional collaboration component.
Expand SB 9 to the coastal zone.	Program 5: SB 9 Mapping Tool has been expanded to assess the feasibility of applying SB 9 within the coastal zone. The timing for the program has also been moved up.

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CHAPTER 2: HOUSING NEEDS ANALYSIS

Overview of Marin County

Marin County is located immediately north of San Francisco, across the Golden Gate Bridge. The County encompasses 606 square miles and is home to 257,774 residents1. Most of the population lives along the County's urban east side, primarily in the County's 11 incorporated cities and towns. The City of San Rafael is the County seat.

Marin County's population is primarily affluent, educated, and relatively racially homogenous. Data for 2019 (represented 2015-2019 ACS estimates) shows that White residents make up more than three-fourths of the unincorporated County population. The balance of the population is as follows: Hispanics comprise 10%, Asian and Pacific Islanders account for 5.5%, African Americans make up 3% and residents that are another race or two or more races total 5%. The 2021 median household income is $149,600, 1.7 times the median household income for California as a whole.[2] Marin County has one of the highest median household incomes among California's 58 counties.[3] While Marin is a wealthy county overall, it is also home to populations impacted by the high cost of living. According to the Insight Center, the cost of basic expenses rose by 16% between 2018 and 2021.[4,5] The Insight Center also reported that 37% of households in the County did not get paid enough compared to the cost of living, despite recent increases to minimum wage. The high cost of living in Marin County, in conjunction with the continued rising costs of other basic necessities, has resulted in the inability of many working families to meet their basic housing, food, and childcare needs.

Overview of Unincorporated Marin County

This section of the Housing Element evaluates and addresses housing needs in the unincorporated areas of Marin County for the 2023-2031 planning period. Given the large geographic areas covered by the unincorporated County, data is presented for the entire unincorporated County area as well as for 11 communities within the

[1] California Department of Finance, E-5 series, 2021.
[2] California Department of Housing and Community Development (HCD). Median household income in California is $90,100 (HCD 2021: https://www.hcd.ca.gov/grants-funding/income-limits/state-and-federal-income-limits/docs/income-limits-2021.pdf)
[3] California Department of Housing and Community Development (HCD).
[4] Insight Center; The Cost of Being California in 2021- Bay Area Key Findings: Marin County. https://insightcced.org/the-cost-of-being-californian-marin-county-fact-sheet/ According to the Insight Center's Family Needs Calculator, "Basic Needs" include the cost of housing, food, childcare, health care, transportation, and taxes—without accounting for public or private assistance.
[5] For Marin County households with two adults, one school-age child, and a preschooler.

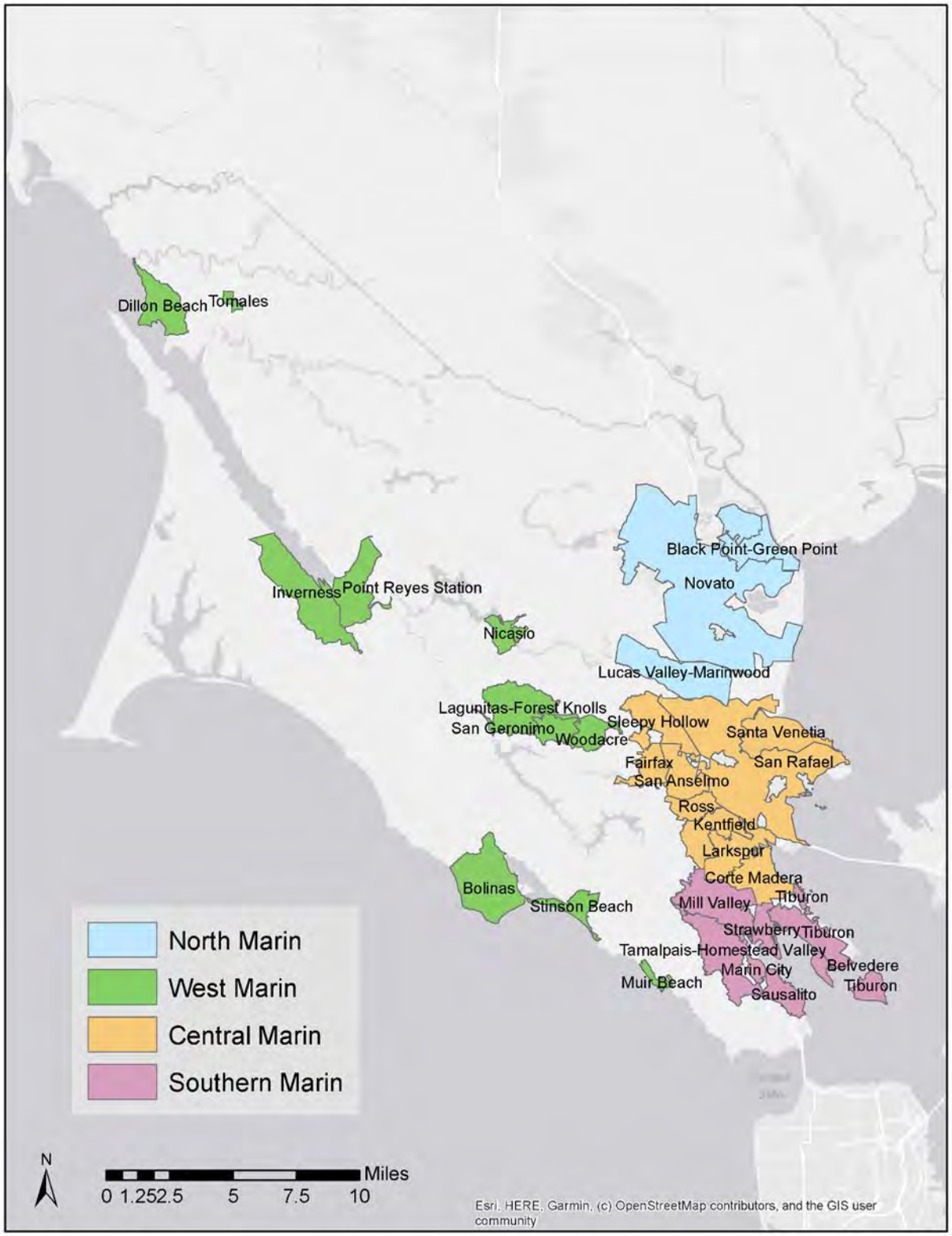
unincorporated areas. Each community is made up of the following Census Designated Places (CDP):

Table H-2.1: Marin Unincorporated County Communities

Community Name	CDPs included
Black Point-Green Point	Black Point – Green Point
Northern Costal West Marin	Dillon Beach, Tomales
Central Coastal West Marin	Point Reyes, Inverness
The San Geronimo Valley	Nicasio, San Geronimo Valley, Woodacre, Lagunitas-Forest Knolls
Southern Coastal West Marin	Stinson Beach, Bolinas, Muir Beach
Marinwood/Lucas Valley	Lucas Valley, Marinwood
Santa Venetia/Los Ranchitos	Santa Venetia
Kentfield/Greenbrae	Kentfield
Strawberry	Strawberry
Tam Valley	Tamalpais-Homestead Valley
Marin City	Marin City

Figure II-1 shows the locations of the unincorporated County's 11 communities. The communities are divided into north, west, central and southern geographical areas.

Figure H-2.1: Marin Communities



Sources of Information

The County used a variety of data sources for the assessment of fair housing at the regional and local level. These include:

- Housing Needs Data Packets prepared by the Association of Bay Area Governments (ABAG), which rely on 2015-2019 American Community Survey (ACS) data by the U.S. Census Bureau for most characteristics
    - Note: The ABAG Data Packets also referenced the U.S. Department of Housing and Urban Development (HUD) Comprehensive Housing Affordability Strategy (CHAS) reports (based on the 2013-2017 ACS)
- U.S. Census Bureau's Decennial Census (referred to as "Census") and American Community Survey (ACS)
- Marin County Analysis of Impediments to Fair Housing Choice in January 2020 (2020 AI)
- Marin County 2020-2024 Consolidated Plan
- California Department of Finance, E-5 Series Population and Housing Estimates.

Some of these sources provide data on the same topic, but because of different methodologies, the resulting data differ. For example, the decennial census and ACS report slightly different estimates for the total population, number of households, number of housing units, and household size. This is in part because ACS provides estimates based on a small survey of the population taken over the course of the whole year. Because of the survey size and seasonal population shifts, some information provided by the ACS is less reliable. For this reason, the readers should keep in mind the potential for data errors when drawing conclusions based on the ACS data used in this chapter. The information is included because it provides an indication of possible trends. The analysis makes comparisons between data from the same source during the same time periods, using the ABAG Data Package as the first source since ABAG has provided data at different geographical levels for the required comparisons. As such, even though more recent ACS data may be available, 2014-2019 ACS reports are cited more frequently, and 2013-2017 CHAS estimates were used.

The County also used findings and data from a variety of locally gathered and available information, such as a surveys, local history and community outreach responses. This information was included as local context throughout this chapter.

Regional Housing Need Allocation

The Regional Housing Needs Allocation (RHNA) is a critical part of State housing element law (Government Code Section 65580). The process for determining the RHNA is briefly described below[6]:

- The State Department of Housing and Community Development uses a California Department of Finance growth projection and other factors to determine the number of housing units that are needed statewide over an eight-year planning period (for Marin County and other Bay Area jurisdictions, this time period is years 2023-2031).
- This statewide housing unit number (called the Regional Housing Needs Determination, or RHND), is divided into regions. Marin County is located within the Association of Bay Area Governments (ABAG) region.
- ABAG is responsible for creating a methodology to distribute the RHND among all of its cities and counties. Each jurisdiction's housing unit number is called the Regional Housing Needs Allocation (RHNA).
- The RHNA is the number of units that a jurisdiction must plan for in the Housing Element update. The units are divided into four different categories based on median income: very low (earn <50% of the area median income), low (earn between 51% and 80% of the area median income), moderate (earn between 81% and 120% of the area median income) and above moderate (earn 121% or more of the area median income). These categories are explained and examined in greater detail later in this section.

Almost all jurisdictions in the Bay Area received a larger RHNA this cycle compared to the last housing element cycle, primarily due to changes in state law that led to a considerably higher RHND compared to previous cycles.

Table H-2.2 illustrates the unincorporated area of Marin County's RHNA by income category for the 2023-2031 planning period. Per State law, local jurisdictions are also required to provide an estimate for their projected extremely low income households (those earning 30% or less of the area median income). Jurisdictions can use half of their very low income RHNA allocation to make this projection. Therefore, unincorporated Marin County is dividing the very low income allocation of 1,100 units in half to meet this state requirement.

[6] ABAG/MTC Staff and Baird + Driskell Community Planning; Housing Needs Data Report: Unincorporated Marin.; April 2, 2021.

Table H-2.2: Housing Need by Income Category, Unincorporated Marin County

Extremely Low (0-30% AMI)	Very Low (30-50% AMI)	Low (51-80% AMI)	Moderate (81-120% AMI)	Above Moderate (121%+ AMI)	Total RHNA
550	550	634	512	1,323	3,569

Source: Association of Bay Area Governments; Final Regional Housing Needs Allocation (RHNA) Methodology and Draft Allocations: https://abag.ca.gov/sites/default/files/documents/2021-05/ABAG_2023-2031_Draft_RHNA_Plan.pdf

Population Trends

In 2021, Marin County's total population was 257,774, 66,888 of whom lived within unincorporated areas.[7] The total population of unincorporated Marin County decreased by 539 between 2010 and 2021 (Table H-2.3). While population in both the unincorporated County and the County grew in the first half of the 2010s, since 2017 the population has decreased in both areas, with the most significant drop occurring in the most recent year (Table H-2.4). Between 2020 and 2021, the population in the unincorporated County decreased by 2.6%, over twice as much as in the County as whole (1.2%). The Association Bay Area of Governments (ABAG) projects that the population in the unincorporated County will grow by only 2% in the next two decades. Tam Valley, Kentfield/Greenbrae, and the Marinwood/Lucas Valley communities are the most populous areas within the unincorporated County (Table H-2.5).

Despite these population projections, according to ABAG, housing production has not kept up with demand for several decades in the Bay Area, including Marin, as the total number of units built and available has not yet come close to meeting the population and job growth experienced throughout the region. In unincorporated Marin County, the largest proportion of the housing stock was built from 1960 to 1979, with 10,258 units constructed during this period (see Table H-2.18Table H-2.18:). Since 2010, 1.2% of the current housing stock was built, which equates to 360 units. In addition, as described later in this chapter, finding housing in the unincorporated County is impacted by: (1) the number of housing units used as vacation homes or short-term rentals, (2) high housing costs and lack of diverse housing typologies. A majority of housing units in Marin County are detached houses. As mentioned above, almost all jurisdictions in the Bay Area received a larger RHNA this cycle compared to the last housing element cycle,

[7] California Department of Finance, E-5 series, 2021.

primarily due to changes in state law that led to a considerably higher RHND compared to previous cycles.

Table H-2.3: Population Growth Trends, Unincorporated County

Year	Population	Number	% Change Projected
2010	67,427	N/A	N/A
2021	66,888	-539	-0.8%
2030*	66,870	-18	0.0%
2040*	68,265	1,395	2.1%

*Source: California Department of Finance, E-5 series, 2010 and 2021. *Association of Bay Area Governments (ABAG) Plan Bay Area Projections 2040, November 2018.*

Table H-2.4: Population Growth Trends - Unincorporated Marin County and Marin County

Year	Unincorporated Marin	% Change	Marin County	% Change from previous year
2010	67,427	---	252,409	---
2011	68,172	1.1%	254,428	0.8%
2012	68,202	0.0%	256,662	0.9%
2013	68,069	-0.2%	258,133	0.6%
2014	68,831	1.1%	261,001	1.1%
2015	69,275	0.6%	262,743	0.7%
2016	69,152	-0.2%	263,327	0.2%
2017	69,098	-0.1%	263,018	-0.1%
2018	68,942	-0.2%	262,652	-0.1%
2019	68,902	-0.1%	262,240	-0.2%
2020	68,659	-0.4%	260,831	-0.5%
2021	66,888	-2.6%	257,774	-1.2%

Source: California Department of Finance, E-5 series, 2010-2021.

Table H-2.5: Population by Unincorporated County Community

Community	Population	% of Unincorporated County
Black Point-Green Point	1,622	2.4%
Northern Costal West Marin	445	0.6%
Central Coastal West Marin	1,385	2.0%
The San Geronimo Valley	3,412	5.0%
Southern Coastal West Marin	2,010	2.9%
Marinwood/Lucas Valley	6,686	9.7%
Santa Venetia/Los Ranchitos	4,474	6.5%
Kentfield/Greenbrae	7,020	10.2%
Strawberry	5,527	8.0%
Tam Valley	11,689	17.0%
Marin City	3,126	4.5%
Unincorporated County	68,902	100.0%

Source: American Community Survey (ACS), 2015-2019 5 Year Estimates. California Department of Finance, E-5 series.

Note: ACS 2019 data is the most recent data available by Census Designated Place (CDP), which is needed to calculate the population by community.

Age

The distribution of age groups in a community shapes what types of housing the community may need in the near future. An increase in the older population may signal a developing need for more senior housing options, while higher numbers of children and young families can point to the need for more family housing options and related services. Ageing in place or downsizing to stay within a community has become a growing trend, which can illustrate the need for more multi-family and accessible units. In unincorporated Marin County, the median age in 2000 was 41.1; by 2019, this figure had increased to 47 years.

The proportion of population by age group in unincorporated Marin County is similar to the County as a whole, but with a slightly higher percentage of people 45 years old and over (54% in unincorporated Marin County area, 53% in the overall County). According to 2019 American Community Survey (ACS) data, 22% of the unincorporated County's

population is age 65 or older. The data also illustrates disparities in geography by age group. For example, more than a third of the population in Central Coastal West Marin, The San Geronimo Valley, Southern Coastal West Marin is over 65 years old. Additionally, Central Coastal West Marin and Southern Coastal West Marin have the lowest proportion of people under the age of 24, 9% and 11% , respectively. By contrast, in Marinwood/Lucas Valley, Kentfield Greenbrae, Tam Valley, and Marin City, about a third of the population is younger than 24.

Table H-2.6: Population by Age

Community	Under 18	18-24	25-44	45-65	65+	Total	Median Age
Black Point- Green Point	8.0%	12.5%	11.3%	38.3%	29.8%	1,622	56.1
Northern Costal West Marin	19.6%	3.4%	28.3%	26.3%	22.5%	445	50.6
Central Coastal West Marin	5.9%	3.2%	10.7%	32.4%	47.7%	1,385	64.8
The San Geronimo Valley	19.0%	1.1%	20.9%	28.5%	30.6%	3,412	49.0
Southern Coastal West Marin	9.8%	1.3%	19.7%	27.0%	42.3%	2,010	58.3
Marinwood/Lucas Valley	24.2%	4.9%	17.1%	31.1%	22.7%	6,686	47.8
Santa Venetia/ Los Ranchitos	16.0%	9.0%	18.9%	31.5%	24.6%	4,474	49.6
Kentfield/ Greenbrae	25.5%	7.0%	16.7%	30.1%	20.7%	7,020	45.4
Strawberry	20.1%	10.8%	18.2%	31.6%	19.3%	5,527	45.5
Tam Valley	23.7%	5.0%	17.5%	34.5%	19.3%	11,689	47.1
Marin City	27.7%	4.0%	28.3%	30.1%	9.8%	3,126	36.0
Unincorporated County	19.8%	6.7%	19.5%	31.8%	22.2%	68,252	47.0
Marin County	20.2%	6.5%	20.6%	31.0%	21.6%	259,943	46.8

Median age is calculated as the average of median ages among CDPs that form a community.

Source: American Community Survey (ACS), 2015-2019 5 Year Estimates. Table B01001; Association of Bay Area Governments (ABAG) Housing Needs Data Packet: Marin County, 2021.

Note: Please refer to Table II-1 and Figure II-1 for the census designated places included in the unincorporated communities.

Race/Ethnicity

Understanding the racial makeup of a community and region is important for designing and implementing effective housing policies and programs that respond to specific needs and barriers. Disparities in wealth and housing are shaped by both market factors and historic government actions such as exclusionary zoning, discriminatory lending practices, and displacement of more vulnerable communities, such as communities of color, that continues today. Since 2000, the percentage of residents in unincorporated Marin County identifying as White has decreased and the percentage of residents of all other races and ethnicities has increased—by 5.3 percentage points. In absolute terms, the Other Race, Non-Hispanic population increased the most, while the White, Non-Hispanic population decreased the most.

Table H-2.7: Population by Race, Unincorporated Marin County, 2000-2019

Race	2000	2010	2019
American Indian or Alaska Native	0.4%	0.3%	0.3%
Asian / API	4.2%	5.0%	5.5%
Black or African American	6.3%	5.3%	3.0%
White, Non-Hispanic	81.3%	76.7%	76.0%
Other Race	0.4%	3.3%	5.0%
Hispanic or Latinx	7.5%	9.4%	10.3%
Total Population	67,192	67,427	68,252

Note:

- Data for 2019 represents 2015-2019 ACS estimates.

-The Census Bureau defines Hispanic/Latinx ethnicity separate from racial categories. For the purposes of this table, the "Hispanic or Latinx" racial/ethnic group represents those who identify as having Hispanic/Latinx ethnicity and may also be members of any racial group. All other racial categories on this graph represent those who identify with that racial category and do not identify with Hispanic/Latinx ethnicity.

"Other race" refers to persons that identified as, some other race or two or more races but not Hispanic/Latinx

Source: U.S. Census Bureau, Census 2000, Table P004; U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B03002

In the unincorporated area, Marin City has the largest proportion of Hispanic residents, 25%, significantly greater than all the unincorporated County areas (10%) and Marin County as a whole (16%). The communities of Northern Coastal West Marin, the San Geronimo Valley, and Marinwood/Lucas Valley have a Hispanic population representing 10 to 13% of the total population while the percentage of Hispanic residents in all other communities is less than 10% of the total population.

Marin City, a historic African American enclave, is also home to the County's largest Black/African American population, at 22%, and is considerably higher than any other community in Marin County. The community has experienced significant gentrification pressures and displacement of Black/African American residents. Since 2010, Marin City's Black/African American decreased by half, from roughly 40% to 22% (2010 Census, ACS 5-year data). With COVID-19, these trends have been accelerated, and illustrate the communities that are at increasingly at risk- Hispanic/Latinx populations represent about 16% of the County population, but 34% of Rental Assistance requests, while and Black/African American residents represent about 2% of the County population, but 8.5% of Rental Assistance requests. Please refer to the Affirmatively Furthering Fair Housing (AFFH) appendix of this document for additional information.

Table H-2.8: Population by Race, Unincorporated Marin County Communities

Community	American Indian or Alaska Native	Asian / API	Black or African American	White, Non-Hispanic	Other Race	Hispanic or Latinx	Total
Black Point- Green Point	0.0%	9.3%	0.0%	80.3%	3.2%	7.2%	1,622
Northern Costal West Marin	0.0%	4.9%	0.0%	84.9%	0.0%	10.1%	445
Central Coastal West Marin	0.0%	0.0%	0.0%	91.3%	0.9%	7.9%	1,385
The San Geronimo Valley	0.6%	0.8%	0.1%	85.9%	1.7%	10.9%	3,412
Southern Coastal West Marin	0.0%	0.8%	0.0%	89.2%	5.1%	4.9%	2,010
Marinwood/Lucas Valley	0.0%	6.0%	0.1%	73.6%	7.1%	13.3%	6,686
Santa Venetia/ Los Ranchitos	0.0%	10.1%	3.7%	71.2%	9.3%	5.7%	4,474
Kentfield/ Greenbrae	0.0%	4.0%	0.0%	86.7%	3.4%	5.9%	7,020
Strawberry	0.0%	13.2%	1.2%	73.3%	4.7%	7.7%	5,527
Tam Valley	0.0%	5.8%	1.3%	82.3%	5.0%	5.6%	11,689
Marin City	0.0%	6.9%	21.7%	32.9%	13.8%	24.8%	3,126

Table H-2.8: Population by Race, Unincorporated Marin County Communities

Community	American Indian or Alaska Native	Asian / API	Black or African American	White, Non-Hispanic	Other Race	Hispanic or Latinx	Total
Unincorporated Marin	0.3%	5.5%	3.0%	76.0%	5.0%	10.3%	68,252
Marin County	0.2%	5.9%	2.1%	71.2%	4.7%	16.0%	259,943

Note: For the purposes of this table, the "Hispanic or Latinx" racial/ethnic group represents those who identify as having Hispanic/Latinx ethnicity and may also be members of any racial group. All other racial categories on this graph represent those who identify with that racial category and do not identify with Hispanic/Latinx ethnicity.

"Other race" refers to persons that identified as some other race or two or more races but not Hispanic/Latinx

Source: American Community Survey 5-Year Data (2015-2019), Table B03002

Note: Please refer to Table II-1 and Figure II-1 for the census designated places included in the unincorporated communities

Employment Trends

The Marin County resident workforce is predominantly composed of professional workers. Over 93% of the County's residents age 25 or older have at least a high school diploma, compared with about 83% statewide; 60% in this same age group have a bachelor's degree or higher in the County (33% in the State).[8] These higher than average educational levels directly correlate with a low poverty rate of 7.2 % in the County compared with 13% statewide.[9] The County's largest employers include County government, Kaiser Permanente, BioMarin Pharmaceutical, San Quentin prison, and Marin General Hospital.[10] Over 30% of the unincorporated County's working population is employed in Health and Educational Services industries, and the most common occupations of unincorporated Marin residents are in the Management, Business, Science, and Arts professions (Table H-2.9 and Table H-2.10).

[8] ACS, 2015-2019 5-year estimates. Table S1501.
[9] ACS, 2015-2019 5-year estimates. Table S1701.
[10] County of Marin 2020 Comprehensive Annual Financial Report

Table H-2.9: Resident Employment by Industry

Geography	Agriculture & Natural Resources	Construction	Financial & Professional Services	Health & Educational Services	Information	Manufacturing, Wholesale & Transportation	Retail	Other
Unincorporated Marin	1.2%	5.6%	30.7%	31.6%	3.5%	10.8%	7.2%	9.4%
Marin County	0.7%	5.8%	30.9%	30.2%	3.7%	10.3%	9.1%	9.2%
Bay Area	0.7%	5.6%	25.8%	29.7%	4.0%	16.7%	9.3%	8.2%

Notes:

-The data displayed shows the industries in which jurisdiction residents work, regardless of the location where those residents are employed (whether within the jurisdiction or not).

-Categories are derived from the following source tables: Agriculture & Natural Resources: C24030_003E, C24030_030E; Construction: C24030_006E, C24030_033E; Manufacturing, Wholesale & Transportation: C24030_007E, C24030_034E, C24030_008E, C24030_035E, C24030_010E, C24030_037E; Retail: C24030_009E, C24030_036E; Information: C24030_013E, C24030_040E; Financial & Professional Services: C24030_014E, C24030_041E, C24030_017E, C24030_044E; Health & Educational Services: C24030_021E, C24030_024E, C24030_048E, C24030_051E; Other: C24030_027E, C24030_054E, C24030_028E, C24030_055E

Source:

U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table C24030

Table H-2.10: Resident Employment by Occupation

Geography	Management, Business, Science, And Arts Occupations	Natural Resources, Construction, And Maintenance Occupations	Production, Transportation, And Material Moving Occupations	Sales And Office Occupations	Service Occupations
Unincorporated Marin	58.6%	5.1%	4.0%	18.6%	13.6%
Marin County	55.3%	5.3%	5.0%	19.6%	14.8%
Bay Area	49.5%	6.5%	8.7%	18.9%	16.3%

Notes:

-The data displayed shows the occupations of jurisdiction residents, regardless of the location where those residents are employed (whether within the jurisdiction or not).

-Categories are derived from the following source tables: management, business, science, and arts occupations: C24010_003E, C24010_039E; service occupations: C24010_019E, C24010_055E; sales and office occupations: C24010_027E, C24010_063E; natural resources, construction, and maintenance occupations: C24010_030E, C24010_066E; production, transportation, and material moving occupations: C24010_034E, C24010_070E

Source: U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table C24010

Balance of Jobs to Workers

As indicated in the notes for Table II-9 and Table II-10, the data shows the occupations of unincorporated County residents regardless of the location of the job. Between 2010 and 2018, the number of jobs in unincorporated Marin County increased by 16.7% from 15,938 to 18,601 jobs.[11]

The ABAG Housing Needs Report noted that unincorporated Marin County is considered a net exporter of workers due to a jobs-to-resident workers ratio of 0.71 (22,519 jobs and 31,805 employed residents[12]). This signifies the unincorporated County has a surplus of workers and "exports" workers to other parts of the region.

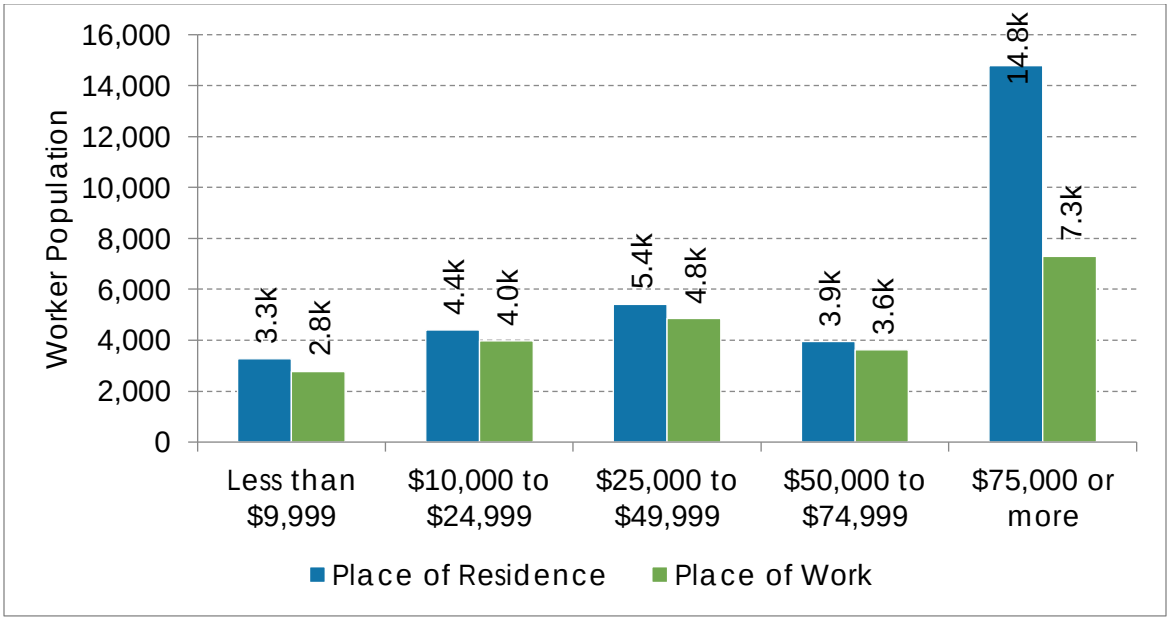
Comparing jobs to workers, broken down by different wage groups, can offer additional insight into local dynamics. Figure H-2.2 shows that unincorporated Marin County has

[11] The data is tabulated by place of work, regardless of where a worker lives. Source: ABAG Housing Data Needs Report 2021; U.S. Census Bureau, Longitudinal Employer-Household Dynamics, Workplace Area Characteristics (WAC) files, 2010-2018.

[12] Employed residents in a jurisdiction is counted by place of residence (they may work elsewhere) while jobs in a jurisdiction are counted by place of work (they may live elsewhere). These data differ from the 18,601 jobs cited in the previous paragraph due to different data sources. Source: U.S. Census Bureau, American Community Survey 5-Year Data 2015-2019, B08119, B08519.

more residents in all wage groups than jobs, with a particularly greater imbalance at the highest wage category; the unincorporated County has more high-wage residents than high-wage jobs (where high-wage refers to jobs paying more than $75,000). Surpluses of workers in a wage group relative to jobs means the community will export those workers to other jurisdictions. Such flows are not inherently bad, although over time, sub-regional imbalances may appear.

Figure H-2.2:Workers by Earnings, Unincorporated County as Place of Work and Place of Residence



According to ABAG, this measure of the relationship between jobs and workers "may directly influence the housing demand in a community. New jobs may draw new residents, and when there is high demand for housing relative to supply, many workers may be unable to afford to live where they work, particularly where job growth has been in relatively lower wage jobs. This dynamic not only means many workers will need to prepare for long commutes and time spent on the road, but in the aggregate, it contributes to traffic congestion and time lost for all road users." If there are more jobs than employed residents, it means a city or county is relatively jobs-rich, typically also with a high jobs-to-household ratio. Unincorporated Marin County is a jobs-poor area (more residents than jobs) and has a relatively low jobs-to-household ratio (0.7 in 2018) compared to 1.06 in Marin County.[13] However, the jobs-to-household ratio in the unincorporated County has increased similarly as Marin County between 2010 and 2018 (by 0.10).

[13] This jobs-household ratio serves to compare the number of jobs in a jurisdiction to the number of housing units that are actually occupied. Source: ABAG Housing Needs Report, 2021. U.S. Census Bureau, Longitudinal Employer-Household Dynamics, Workplace Area Characteristics (WAC) files (Jobs), 2002-2018; California Department of Finance, E-5 (Households)

A balance between jobs and employed residents can help reduce greenhouse gas emissions, freeway congestion, and fuel consumption, and can result in improved air quality. A jobs-housing balance can also provide savings in travel time for businesses and individuals. However, a one-to-one ratio between jobs and employed residents does not guarantee a reduction in commute trips. Marin County nearly has a 1:1 ratio, but the disparity between the types of jobs and the cost of housing contributes to this imbalance.

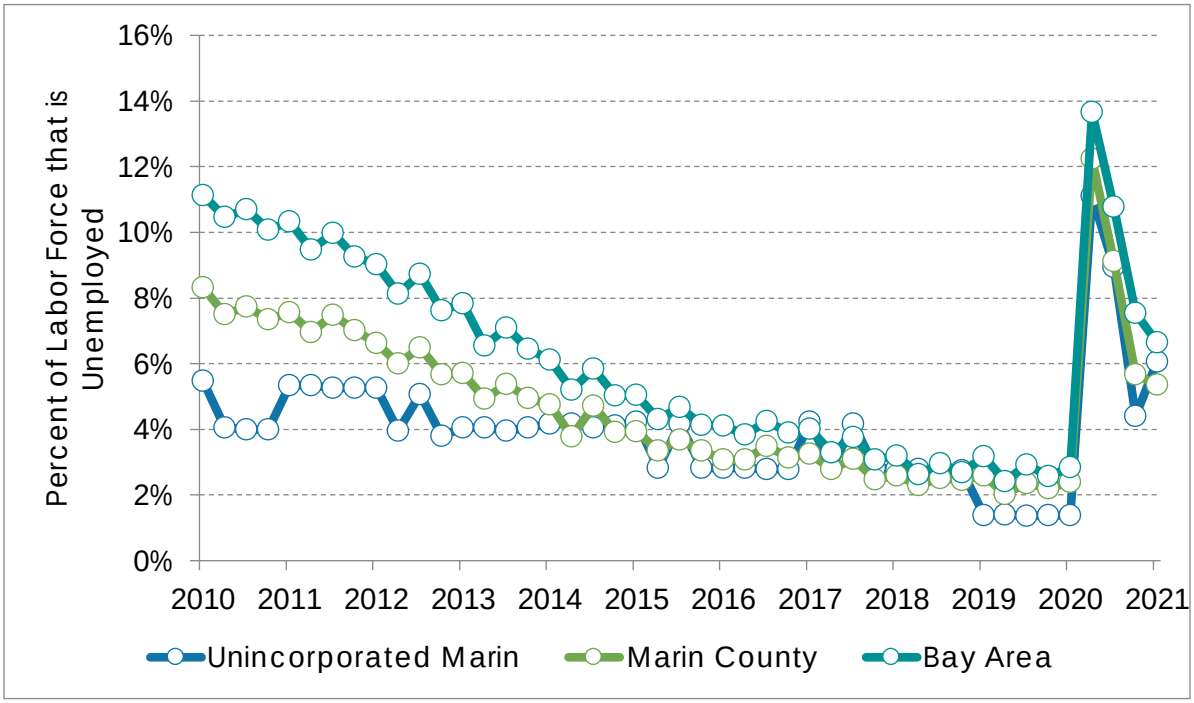
According to the U.S. Bureau of Labor Statistics, the average wage earned at a Marin County-based job as of the first quarter of 2021 was $90,168 a year, which is considered below the low income threshold for a household of one.[14,15] Additionally, according to the ACS, the median income of a single person household in Marin of $62,606.[16] The median home sale price of a single-family detached home of $1.91 million or of a condominium of $740,08817 is out-of-reach for a significant portion of the population. Even with a 1:1 ratio of jobs to housing, Marin County will continue to import workers from neighboring counties where more affordable housing is located. Therefore, a focus of this Housing Element is to address the issue of matching housing costs and types to the needs and incomes of the community's workforce.

Unemployment

In unincorporated Marin County, the unemployment rate increased 0.6 percentage points between January 2010 and January 2021, from 5.5% to 6.1%. Jurisdictions throughout the region experienced a sharp rise in unemployment in 2020 due to impacts related to the COVID-19 pandemic, although a general improvement and recovery occurred in the later months of 2020 (Figure H-2.3).

[14] From the Average Weekly pay for all industries ($1,734). Quarterly Census of Employment and Wages, U.S. Department of Labor, September 2021.
[15] California Department of Housing and Community Development (HCD. (HCD 2021: https://www.hcd.ca.gov/grants-funding/income-limits/state-and-federal-income-limits/docs/income-limits-2021.pdf
[16] Nonfamily household. American Community Survey 2015-2019, Five-Year Estimates. Table S1903.
[17] County of Marin Assessor Real Estate Sales Data, August 2021.

Figure H-2.3: Unemployment Rate



Notes:

-Unemployment rates for the jurisdiction level is derived from larger-geography estimates. This method assumes that the rates of change in employment and unemployment are exactly the same in each sub-county area as at the county level. If this assumption is not true for a specific sub-county area, then the estimates for that area may not be representative of the current economic conditions. Since this assumption is untested, caution should be employed when using these data.

-Only not seasonally-adjusted labor force (unemployment rates) data are developed for cities and CDPs.

Source: California Employment Development Department, Local Area Unemployment Statistics (LAUS), Sub-county areas monthly updates, 2010-2021.

Household Characteristics

Household Tenure

The U.S. Census Bureau defines a household as all persons who occupy a housing unit, including families, single people, or unrelated persons. Persons living in licensed facilities or dormitories are not considered households. As of 2019, there were 25,850 households in unincorporated Marin County, a decrease of 343 from the 2010 level of 26,193. Of these 25,850 households, 72% own the home they live in and 28% rent (Table H-2.11). This ownership percentage has increased by 3% since 2010 while renter households decreased by 11% during this same time period. Among the communities in

the unincorporated County, Black Point-Green Point, Marinwood/Lucas Valley, Santa Venetia/Los Ranchitos, and Kentfield/Greenbrae have the highest proportion of owner-households (over 80%,Table H-2.11). By contrast, Marin City and Strawberry have the highest proportion of renter-households (73% and 53%, respectively).

Table H-2.11: Households by Tenure

	Owner occupied	Renter occupied	Total
Black Point-Green Point	80.7%	19.3%	617
Northern Costal West Marin	75.5%	24.5%	212
Central Coastal West Marin	62.1%	37.9%	853
The San Geronimo Valley	74.2%	25.8%	1,500
Southern Coastal West Marin	64.5%	35.5%	1,026
Marinwood/Lucas Valley	88.6%	11.4%	2,412
Santa Venetia/Los Ranchitos	82.6%	17.4%	1,717
Kentfield/Greenbrae	80.9%	19.1%	2,567
Strawberry	46.8%	53.2%	2,391
Tam Valley	76.4%	23.6%	4,617
Marin City	26.7%	73.3%	1,377
Unincorporated Marin	72.0%	28.0%	25,850
Marin County	63.7%	36.3%	105,432

Source: U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B25003

Note: Please refer to Table II-1 and Figure II-1 for the census designated places included in the unincorporated communities

Homeownership rates often vary across race and ethnicity. These disparities not only reflect differences in income and wealth but also stem from federal, state, and local policies that limited access to homeownership for communities of color while facilitating homebuying for white residents. While many of these policies, such as redlining, have been formally disbanded, the impacts of race-based policy are still evident across Bay Area communities.[18] According to ACS, in 2019 19.5% of Black households owned

[18] ABAG/MTC Staff and Baird + Driskell Community Planning; Housing Needs Data Report: Unincorporated Marin (page 26).; April 2, 2021.

their homes, while homeownership rates were 66.6% for Asian households, 55.5% for Latinx households, and 75.0% for White households in unincorporated Marin County.[19]

Household Types

About 54% of unincorporated Marin County's households consist of married-couple families with or without children (Table H-2.12).

The unincorporated County has a higher share of married-couple family households than the County and the Bay Area (about 51%). Approximately 27% of households are occupied by people living alone in the unincorporated County. This percentage was slightly lower than the Marin County figure of 29.9% but higher than the Bay Area figure of 24. %. Among the communities within the unincorporated County, all but four (Black Point-Green Point, Marin/Lucas Valley, Kentfield/Greenbrae, and Tam Valley) have higher shares of single-person households than the unincorporated County, Marin County, and Bay Area. The remaining households in unincorporated Marin County include: male householder with no spouse present (about 4%), female householder with no spouse present (7.6%) and other non-family households (7%).

Table H-2.12: Household Types

	Married-Couple Family	Male Householder, No Spouse Present	Female Householder, No Spouse Present	Single-Person Households	Other Non-Family Households	Total
Black Point-Green Point	65.2%	2.8%	0.0%	21.2%	10.9%	617
Northern Costal West Marin	47.2%	9.9%	3.8%	33.0%	6.1%	212
Central Coastal West Marin	42.3%	0.7%	1.6%	50.4%	4.9%	853
The San Geronimo Valley	40.5%	7.6%	3.1%	35.0%	13.7%	1,500
Southern Coastal West Marin	34.8%	5.6%	3.6%	40.6%	15.4%	1,026
Marinwood/Lucas Valley	60.4%	3.5%	9.2%	20.9%	6.0%	2,412
Santa Venetia/Los Ranchitos	51.6%	0.0%	9.6%	33.4%	5.4%	1,717
Kentfield/Greenbrae	63.9%	2.7%	6.4%	21.8%	5.2%	2,567

[19] See footnote 19.

Table H-2.12: Household Types

	Married-Couple Family	Male Householder, No Spouse Present	Female Householder, No Spouse Present	Single-Person Households	Other Non-Family Households	Total
Strawberry	42.1%	2.8%	11.5%	39.4%	4.2%	2,391
Tam Valley	55.9%	5.7%	7.8%	24.1%	6.5%	4,617
Marin City	28.0%	5.6%	17.1%	37.8%	11.5%	1,377
Unincorporated Marin	54.3%	4.1%	7.6%	27.0%	7.0%	25,850
Marin County	51.4%	3.6%	7.7%	29.9%	7.4%	105,432
Bay Area	51.2%	4.8%	10.4%	24.7%	8.9%	2,731,434

Source: For Marin County and Unincorporated Marin California Department of Finance, E-5 series, 2019. For Unincorporated Communities, American Community Survey Five Year Estimates, 2015-2019, Table B11001.

Note: Please refer to Table H-2.1 and Figure H22.2 for the census designated places included in the unincorporated communities

As shown in Table H-2.12, more than a quarter of the unincorporated County's population are single-person households. The County needs more housing units to serve this population, as the primary stock of housing in the unincorporated County is single-family homes, almost exclusively affordable to above-moderate income households (see Housing Units by Type and Production). There is a shortage of rental housing, including multi-family, single-family, accessory dwelling units, and Single Room Occupancy (SRO) units. In addition, opportunities for smaller, more moderately priced homeownership units are needed to serve singles, senior citizens, and lower income families.

The housing type best suited to serve the workforce of Marin, those with an income of approximately $90,168 a year,[20] is often multi-family rental housing and smaller units located close to transportation and services. Examples of this type of housing include the Fireside and San Clemente developments, which provide rental housing at a range of affordability levels.[21] These housing developments are close to transit and services and help to reduce commute costs to the low income residents. Mixed-use

[20] From the Average Weekly pay for all industries ($1,734). Quarterly Census of Employment and Wages, U.S. Department of Labor, September 2021.

[21] Fireside Apartments includes 50 units; 18 of which are Supportive Housing (10 for families and 8 for formerly homeless seniors). Source: Eden Housing.

developments, like Strawberry Village, are other examples of housing types that may address the needs of Marin's workforce.

Household Size

According to the 2019 ACS 2019, the average household size in Marin County is 2.40 persons, an increase from 2.34 in 2010 (Table H-2.13).[22] While owner-household size has remained almost the same since 2010 (2.42 versus 2.43), the size of renter-households in Marin County has increased in the past decade from 2.20 to 2.33 persons per household. It is possible that high housing prices are forcing people to share living accommodations, thereby increasing household size. Throughout the unincorporated County, and especially in West Marin, people are afraid to speak out about housing conditions due to a fear of retaliation.

Table H-2.13: Household Size by Tenure, Marin County 2010 and 2019

	2010	2019
Average Household Size	2.34	2.40
Renter-Occupied	2.20	2.33
Owner-Occupied	2.42	2.43

Source: 2010 U.S. Census Bureau, 2015-2019 American Community Survey, 5-Year Estimates.

Housing Stock Characteristics

Housing Units by Type and Production

Based on 2021 data from the California Department of Finance (DOF), the unincorporated area of Marin has 24,778 single-family homes constituting 83% of the total housing stock, 4,452 multi-family homes comprising 15% of all housing, and 588 mobile homes, for a total of 29,818 homes (Table H-2.14). Single-family homes are slightly less dominant countywide and make up just over 71 % of the County's total housing stock. Table H-2.14 and Table H-2.15 show the distribution of housing by type for the unincorporated County and the County as a whole. These proportions have not changed significantly in the past Housing Element planning period from 2013 to 2021.

According to ABAG, most housing produced in the region and across the State in recent years consisted of single-family homes and larger multi-unit buildings. However, some households are showing a need for "missing middle housing," including duplexes, triplexes, townhomes, cottage clusters, and accessory dwelling units (ADUs). These

[22] Average household size for unincorporated area is not available.

housing types may open up more options across incomes and tenure, from young households seeking homeownership options to seniors looking to downsize and age-in-place. In unincorporated Marin County, the housing type that experienced the most growth between 2013 and 2021 was single-family housing with an increase of 163 units. Two- to four-unit housing increased by 53 units. Single-family homes also experienced the highest absolute growth in the overall County followed by multi-family housing with five or more units (Table H-2.15).

Table H-2.14: Housing Units by Type, Unincorporated County

Unit Type	2013		2021		Change	
	Number	Percent	Number	Percent	Number	Percent
Single-family (detached & attached)	24,615	83.2%	24,778	83.1%	163	0.7%
2-4 units	1,406	4.8%	1,459	4.9%	53	3.8%
5+ units	2,993	10.1%	2,993	10.0%	0	0.0%
Mobile homes	567	1.9%	588	2.0%	21	3.7%
Total	29,581	100.0%	29,818	100.0%	237	0.8%

Source: Department of Finance E-5 County/State Population and Housing Estimates

Table H-2.15: Housing Units by Type, Countywide

Unit Type	2013		2021		Change	
	Number	Percent	Number	Percent	Number	Percent
Single-family (detached & attached)	79,639	71.4%	80,146	71.1%	507	0.6%
2-4 units	8,222	7.4%	8,503	7.5%	281	3.4%
5+ units	21,704	19.5%	22,046	19.6%	342	1.6%
Mobile homes	1,974	1.8%	1,995	1.8%	21	1.1%
Total	111,539	100.0%	112,690	100.0%	1,151	1.0%

Source: Department of Finance E-5 County/State Population and Housing Estimates

Single-unit housing (attached and detached) makes up close to or over 90% of housing stock in all unincorporated communities except Marin City, where only a third of its stock is single-unit, as shown in Table H-2.16. ABAG's 2021 Housing Needs report

concluded that production has not kept up with housing demand for several decades in the Bay Area, as the total number of units built and available has not yet come close to meeting the population and job growth experienced throughout the region.

Table H-2.16: Housing Units by Type, Unincorporated Communities

Community	Single-Family (Detached & Attached)	2-4 Units	5+ Units	Mobile Homes	Total
Black Point-Green Point	100.0%	0.0%	0.0%	0.0%	617
Northern Costal West Marin	95.8%	0.0%	0.0%	4.2%	212
Central Coastal West Marin	95.3%	0.0%	4.7%	0.0%	853
The San Geronimo Valley	92.9%	4.1%	0.7%	2.3%	1,500
Southern Coastal West Marin	94.2%	4.6%	1.2%	0.0%	1,026
Marinwood/Lucas Valley	97.7%	2.3%	0.0%	0.0%	2,412
Santa Venetia/Los Ranchitos	88.4%	7.4%	4.3%	0.0%	1,717
Kentfield/Greenbrae	89.1%	3.4%	7.6%	0.0%	2,567
Strawberry	49.4%	8.1%	42.0%	0.0%	2,391
Tam Valley	90.8%	4.0%	4.5%	0.7%	4,617
Marin City	28.6%	10.0%	61.4%	0.0%	1,377

Source: American Community Survey, 2015-2019. Table B 25124

Note: Please refer to Table H-2.1: and Figure H-2.1 for the census designated places included in the unincorporated communities

The median home sales prices of single-family homes across the unincorporated County increased from $966,000 to $1.91 million between 2013 and 2021.[23] This represents almost a 100 % increase in prices, while median household income increased by 45%,[24] meaning home values increased significantly more than area incomes. While condominiums and townhomes are more affordable with a median home sales price of $740,088[25], they are still unaffordable for low and moderate income households.

[23] County of Marin Assessor, Real Estate Sales Data. Annual 2013, August 2021.
[24] Based on 2013 and 2021 HCD State Income Limits. Area Median Incomes for four-person households.
[25] County of Marin Assessor, Real Estate Sales Data. August 2021.

Affordable and Assisted Housing

Marin County is served by one housing authority, the Marin Housing Authority (MHA). MHA is a public corporation authorized to provide decent, safe, and sanitary housing for low income people. The Marin Housing Authority operates and administers 496 property units in six locations and receives funding for housing programs from the Department of Housing and Urban Development (HUD).[26]

Approximately 6,125 existing affordable housing units have received some combination of local, federal, or State assistance, representing approximately 5% of the County's total housing units. However, this represents only 14% of the 42,462 low income households in the County. These units typically target renter-households earning 60% of area median income or below and serve populations including low and very low income families, households with disabilities, formerly homeless adults, and older adults. Affordable homeownership units typically serve moderate income households. Affordable housing developers and developers with nonprofit arms manage approximately 4,100 of these units. Nearly 3,000 of these units are assisted through the Marin Housing Authority's Section 8 and public housing programs. Of the public housing units, 296 units serve families, and 200 units serve senior and disabled households. Table H-2.17 shows the types of affordable housing units by type, the 6,125 units consist of the following types:

Table H-2.17: Affordable Housing Units, 2020

Public Housing	496
Seniors	1,126
Family Housing	2,791
Disabled	207
Home Ownership	832
Permanent Supportive Housing	337
Transitional & Shelter	336
Total	6,125

Source: Marin County 2020-2024 Consolidated Plan

As of October 2021, 793 active applicants were on the Housing Choice Voucher/Section 8 waitlist. MHA has housed 124 applicants from the waiting list between 2019 and 2021; in late 2021, 31 applicants were searching for housing with an issued voucher. Most are

[26] County of Marin Analysis of Impediments to Fair Housing Choice, January 2020.

struggling to find rental units with rents that fall within the payment standard and landlords willing to accept Section 8 vouchers, despite both State and local Source of Income Protection laws that prohibit discrimination against Section 8 voucher holders. MHA's Housing Choice Voucher/Section 8 waitlist opened in September 2008, and 11,200 applications were received. More than 6,000 of the applicants were removed from the waiting list due to lack of current mailing address and/or non-eligibility. Additionally, MHA has 734 applicants on the Public Housing waiting list that last opened in early 2013. The need for additional Section 8 housing was identified as an issue, particularly in West Marin, by Housing Element focus group participants.

Age and Condition of Housing Stock

Most of the housing stock in Marin County is more than 30 years old. Approximately 86% of the existing homes throughout the County were built prior to 1990, as demonstrated by Table H-2.18. The housing stock in the unincorporated County is similarly aged, with 88% of housing units built before 1990. Among the unincorporated County communities, the San Geronimo Valley and Tam Valley have the oldest housing stock (over 93% over 30 years old); Black Point-Green Point has the newest housing stock (only 78% of units are older than 30 years) (Table H-2.19).

Table H-2.18: Year Structure Built, Unincorporated County and Marin County

Year Built	Unincorporated	Marin County
2010 or later	1.2%	1.4%
Built 2000 to 2010	3.9%	5.1%
Built 1990 to 1999	6.9%	7.4%
Built 1980 to 1989	10.3%	10.1%
Built 1970 to 1979	16.6%	18.1%
Built 1960 to 1969	18.8%	20.2%
Built 1950 to 1959	23.5%	18.8%
Built 1940 to 1949	7.1%	6.3%
Built 1939 or earlier	11.6%	12.6%
Total	28,973	113,084

Source: American Community Survey, 2015-2019 Five-Year Survey. Table B25034

Table H-2.19: Year Structure Built, Unincorporated County Community Areas

	2010 or Later	2000 to 2010	1990 to 1999	1980 to 1989	1970 to 1979	1960 to 1969	1950 to 1959	1940 to 1949	1939 or Earlier	Total
Black Point-Green Point	0.0%	16.9%	4.9%	16.6%	20.6%	6.4%	15.5%	6.9%	12.3%	627
Northern Costal West Marin	3.6%	0.0%	12.8%	19.9%	25.4%	12.1%	3.6%	0.0%	22.8%	619
Central Coastal West Marin	1.5%	3.0%	14.8%	12.1%	9.6%	17.3%	8.0%	7.4%	26.3%	1,491
The San Geronimo Valley	0.0%	5.2%	2.2%	5.5%	13.8%	14.3%	9.5%	7.4%	42.1%	1,624
Southern Coastal West Marin	4.4%	3.5%	4.3%	12.9%	14.4%	17.9%	11.8%	11.7%	19.1%	1,807
Marinwood/Lucas Valley	0.0%	2.2%	4.0%	5.0%	10.4%	38.1%	39.2%	1.0%	0.0%	2,412
Santa Venetia/Los Ranchitos	1.8%	0.8%	7.8%	6.9%	11.5%	10.9%	47.5%	7.2%	5.6%	1,717
Kentfield/Greenbrae	2.6%	5.2%	2.7%	4.8%	6.2%	18.7%	32.2%	12.0%	15.6%	2,698
Strawberry	1.0%	2.7%	10.2%	9.0%	28.7%	18.2%	22.2%	6.3%	1.6%	2,528
Tam Valley	0.6%	3.4%	5.3%	7.1%	21.8%	19.4%	23.7%	8.1%	10.5%	4,760
Marin City	0.0%	4.1%	14.4%	28.7%	11.5%	21.4%	7.4%	6.4%	6.1%	1,417

Source: American Community Survey, 2015-2019 Five-Year Survey. Table B25034.

Note: Please refer to Table H-2.1: and Figure H-2.1 for the census designated places included in the unincorporated communities

Some ACS data may be less reliable due to small survey sizes. For this reason, readers should keep I mind that the potential for data error and may not be reflective of complete development figures.

The 2019 ACS provides data about the condition of the existing housing stock countywide and in the unincorporated County (Table H-2.20). In general, the condition of the housing stock in Marin County is good, with only 2.6% of occupied housing units having substandard conditions (one or more lacking amenities). In the unincorporated County, 2.3% of the housing stock has one or more potential housing problem, which is slightly lower than the countywide percentage of 2.6%. The most common substandard condition is a lack of telephone service for both owners and renters. However, in today's

digital world, this measure may be outdated as many households have eliminated landline services and opted to rely primarily on mobile devices.

Both countywide and in the unincorporated County, a higher renter-occupied units have substandard conditions than owner-occupied units. As shown in the table below, approximately 5% of renter units have substandard conditions versus approximately 1% of owner units.

Table H-2.20: Substandard Housing Conditions

	Unincorporated County			Marin County		
Amenity	Owner	Renter	All	Owner	Renter	All
Lacking complete kitchen facilities	0.2%	1.4%	0.5%	0.2%	2.4%	1.0%
Lacking plumbing facilities	0.3%	0.8%	0.4%	0.3%	0.6%	0.4%
No telephone service available	0.8%	2.7%	1.4%	0.8%	2.2%	1.3%
All Units with Problem	1.3%	4.9%	2.3%	1.2%	5.1%	2.6%
Total Units	18,611	7,239	25,850	67,115	38,317	105,432

Note:
Survey asked whether telephone service was available in the house, apartment, or mobile home. A telephone must be in working order and service available in the house, apartment, or mobile home that allows the respondent to both make and receive calls.
Source: American Community Survey, 2015-2019. Tables B25053, B25043, and B25049.
Note: Please refer to Table H-2.1: and Figure H-2.1 for the census designated places included in the unincorporated communities

The Marin County Housing Authority (MHA) conducts housing quality inspections (HQS inspections) on their properties. Below is the annual percentage of units that MHA found to be substandard:

- 2021 31%
- 2020 40%
- 2019 32%
- 2018 28%
- 2017 28%

The County's Code Enforcement division is complaint driven and most complaints related to substandard housing are neighbors complaining about an animal or insect infestation close by. Most of these complaints are not able to be substantiated. In recent informal windshield surveys conducted by code enforcement staff, 1-3% of residences have looked substandard. However, this does not account for properties that are

setback from the street, behind a locked gate, or contain accessory buildings, etc. The Environmental Health Services (EHS) Division inspects all multi-family complexes with three or more units every other year on a biennial schedule. While common areas can be inspected, units are only inspected if authorization is given by the tenant. Normally, about 25-30% of all units are inspected. Of those inspected, EHS has reported that very few units are substandard. Under an enhanced inspection program authorized by the Board of Supervisors in 2018, EHS would inspect all units if the owner fails to correct minor or major environmental health code violations within a timely manner, if authorization is given by the tenant. This is particularly the case in West Marin. According to the Marin Housing Authority's Housing Quality Standards (HQS) inspection program, which is undertake for units using Section 8 vouchers, public housing units, and HUD Mental Health Agency (MHA) units, over the past five years, 26% of units inspected did not meet the definition for decent, safe, and sanitary housing. Examples include missing or inoperable smoke detectors, appliances not working, or windows and doors not operating as designed. The Housing Plan includes Program 22 for the County to consider expanding the inspection services to cover the entire housing stock.

Housing Construction Prices and Trends

Throughout Marin County, new housing construction is increasing the size and already high proportion of single-family units relative to other unit types. In Fiscal Year 2020, 38% the new residential construction permits issued were for single-family homes and none for multi-family developments.[27] The average size of these homes was 3,056 square feet, which reflects the predominant development pattern in unincorporated Marin County of large, custom-built, single-family homes. Smaller units, which are usually more affordable, have a higher price per square foot than do larger homes because of land prices.[28] This may act as a disincentive to construct smaller, more modest homes, unless developed a higher density.

The existing construction trends contribute to the increasing imbalance between the wages earned in Marin County and the housing costs of new and existing homes. Due to the high cost of land and limited available stock, these trends were not significantly impacted by the economic downturn associated with the COVID-19 pandemic. Housing costs continue to rise in Marin County, making it increasingly difficult for those at lower and moderate income levels to find affordable housing options.

[27] From the 2020 Annual Progress Report. Table A2 Building Activity (Entitled, Permitted, and Completed Units). 38 % single-family, 58 % accessory dwelling units, and four % mobile homes.
[28] Inclusionary Zoning In-Lieu Fee Analysis, March 2008 by Vernazza Wolf Associates

Vacancy Rate Trends

Data from the 2019 ACS illustrates Marin's homeowner vacancy rate at 0.6% and rental vacancy rate at 2.7%, which are among the lowest in the entire Bay Area region. Table H-2.21 below shows the different types of vacancies with the most common type being For Seasonal, Recreational, Or Occasional Use (vacancy rate of 57.1%). According to ABAG's Housing Needs Report, the Census Bureau classifies a unit as vacant if no one is occupying it when census interviewers are conducting the ACS or Decennial Census. Vacant units classified as "for recreational or occasional use" are those that are held for short-term periods of use throughout the year. Accordingly, vacation rentals and short-term rentals like AirBnBs or VRBO are likely to fall in this category. Based on the Marin County Department of Finance data, 509 units in the unincorporated County were listed as short-term rental properties in January 2022, which is likely an undercount since a number of short-term rentals do not register with the County. For several unincorporated communities, the number of short-term rentals is a significant percentage of the community's overall residential units. This is the case for Muir Beach (35%), Dillon Beach and Marshall (25%) and Stinson Beach (21%[29] The focus groups held for this Housing Element update emphasized that short-term rentals impact the housing market, particularly in West Marin.

The County will explore options in this housing element cycle to limit short-term rentals in order to preserve housing for permanent residential units. Another program will look at possibly establishing a vacant home tax in the unincorporated County. Details of the programs are included in Section 5 of this element. The Census Bureau classifies units as "other vacant" if they are vacant due to foreclosure, personal/family reasons, legal proceedings, repairs/renovations, abandonment, preparation for being rented or sold, or vacant for an extended absence for reasons such as a work assignment, military duty, or incarceration.[30] In a region with a thriving economy and housing market like the Bay Area, units being renovated/repaired and prepared for rental or sale are likely to represent a large portion of the "other vacant" category. Additionally, the need for seismic retrofitting in older housing stock could also influence the proportion of "other vacant" units in some jurisdictions. Table H-2.21 shows that vacant long-term rental properties in unincorporated Marin County. Table H-2.21 also shows that differences in the type of vacant units between the unincorporated County than Marin County. While the unincorporated County has higher overall vacancy rates than Marin County, it has a lower for-rent vacancy rate (6.3%) than the County (14.2%).

[29] Marin County Housing and Federal Grants. Measure W Working Group Data Package.
[30] For more information, see pages 3 through 6 of this list of definitions prepared by the Census Bureau: https://www.census.gov/housing/hvs/definitions.pdf.

Table H-2.21: Vacant Units by Type

Geography	Unincorporated Marin	Marin County
For Rent	6.3%	14.2%
For Sale	2.1%	4.6%
For Seasonal, Recreational, Or Occasional Use	57.1%	33.1%
Other Vacant	30.7%	40.6%
Rented, Not Occupied	2.5%	4.2%
Sold, Not Occupied	1.4%	3.3%
Total Vacant out of Total Housing Units	10.8%	6.8%

Source: American Community Survey, 2015-2019. Tables B25002 and B25004.

In general, a higher vacancy rate is considered necessary by housing experts to assure adequate choice in the marketplace and to temper the rise in home prices. A minimum five % rental vacancy rate is considered crucial to permit ordinary rental mobility. In a housing market with a lower vacancy rate, strong market pressure will inflate rents, and tenants will have difficulty locating appropriate units. The 2000s saw a significant tightening in the local housing market due to the recession, a phenomenon that was also experienced in many Bay Area communities. Nationwide, there was a sharp drop in multi-family housing construction during the since the 1990s but especially in the past 20 years, which has also contributed to low vacancy rates and rising rents.

According to Fair Housing Advocates of Northern California (FHANC)[31], Marin County's low vacancy rate also increases the tendency for landlords to discriminate against potential renters. Between 2020 and 2021, 68 complaints were from unincorporated communities. Overall, Marin City had the highest incidence of reported discrimination complaints, making up about 45.6% of all the complaints in the unincorporated County (please refer to AFFH appendix for additional information). The focus groups for this Housing Element update expressed that discrimination is experienced by people of color and families and that many people do not speak out about housing conditions because of retaliation concerns. FHANC's staff attorney advocates for tenants and negotiates with landlords to find reasonable accommodations for thousands of persons with disabilities, to enable them to live in accessible housing. They also educate landowners on fair housing laws, provides seminars and brochures in English, Spanish,

[31] The Fair Housing Advocates of Northern California (FHANC) is a civil rights organization that investigates housing discrimination, including discrimination based on race, national origin, disability, gender, and children.

and Vietnamese on how to prepare for a housing search and recognize discrimination, and sponsors school programs aimed at encouraging tolerance.

Housing Costs, Household Income, and Ability to Pay for Housing

Household Income

Income is defined as wages, salaries, pensions, social security benefits, and other forms of cash received by a household. Non-cash items, such as Medicare and other medical insurance benefits, are not included as income. For housing to be considered affordable, housing costs should not exceed 30% of income. Housing costs include rent and utilities for renters, and principal, interest, property taxes, and insurance for homeowners. It is therefore critical to understand the relationship between household incomes and housing costs to determine how affordable or unaffordable housing really is.

An estimated 38% of unincorporated Marin County households fall in the extremely low, very low, and low income categories, earning less than 80% of median income (Table H-2.22). In comparison, approximately 41% of all Marin County households and 39% of Bay Area households earn less than 80% of median income. There is an even greater proportion of extremely low, very low, and low income households among renters. Estimates from 2017 report that 57% of all renters in unincorporated Marin County were in the extremely low, very low, and low income categories.[32]

[32] Association of Bay Area Governments Metropolitan Transportation Commission, Housing Needs Data Report: Unincorporated Marin, April 2, 2021.

Table H-2.22: Households by Income Level- Unincorporated County and Marin County

	Uincorporated Marin		Marin County	
	Number	Percent	Number	Percent
Extremely Low (0%-30% of AMI)	3,623	14.0%	15613	14.9%
Very Low (31%-50% of AMI)	2,773	10.7%	11749	11.2%
Low (51%-80% of AMI)	3,537	13.6%	15100	14.4%
Median (81%-100% of AMI)	2,185	8.4%	9385	9.0%
Moderate and Above (Greater than 100% of AMI)	13,826	53.3%	53004	50.6%
Total Households	25,944	100.0%	104,851	100.0%

Source: U.S. Department of Housing and Urban Development (HUD), Comprehensive Housing Affordability Strategy (CHAS) ACS tabulation, 2013-2017 release in ABAG Housing Needs Data Packet.

Note: Please refer to Table H-2.1: and Figure H-2.1 for the census designated places included in the unincorporated communities

For the unincorporated communities, Table H-2.23 illustrates that five communities have a majority (more than 50 %) of above moderate income households. The Kentfield/Greenbrae community has the highest percentage (68.7) of above moderate income households. A significant percentage of lower income households are found in Northern-Coastal West Marin, Central-Coastal West Marin, the San Geronimo Valley, Santa Venetia/Los Ranchitos, Strawberry, and Marin City. The communities of Central-Coastal West Marin and Marin City have the highest percentages of extremely low income households (29% and 39.7%, respectively).

Table H-2.23: Households by Household Income Level, Unincorporated Communities

Community	0%-30% of AMI	31%-50% of AMI	51%-80% of AMI	81%-100% of AMI	Greater than 100% of AMI	Total
Black Point-Green Point	8.5%	8.5%	14.5%	6.8%	61.5%	585
Northern Costal West Marin	23.3%	14.0%	4.7%	7.0%	51.2%	215
Central Coastal West Marin	29.0%	14.0%	18.8%	7.5%	30.6%	930
The San Geronimo Valley	15.1%	11.9%	16.4%	14.0%	42.6%	1,641
Southern Coastal West Marin	18.3%	10.3%	17.3%	7.5%	46.7%	975
Marinwood/Lucas Valley	8.4%	11.1%	12.1%	15.0%	53.5%	2,440
Santa Venetia/Los Ranchitos	14.6%	14.3%	17.1%	13.7%	40.3%	1,750
Kentfield/Greenbrae	10.0%	7.5%	8.8%	5.0%	68.7%	2,605
Strawberry	18.8%	9.0%	15.1%	9.4%	47.8%	2,450
Tam Valley	9.6%	6.0%	9.0%	7.3%	68.0%	4,365
Marin City	39.7%	23.0%	8.3%	5.2%	23.8%	1,260

Source: U.S. Department of Housing and Urban Development (HUD), Comprehensive Housing Affordability Strategy (CHAS) ACS tabulation, 2013-2017 release.

Note: Please refer to Table H-2.1: and Figure H-2.1 for the census designated places included in the unincorporated communities

In Marin County, the median income as of 2021 for a family of four is $149,600, which is a 45% increase from the median income in 2013. A household of four with an income less than $54,800 is considered extremely low income.[33] As of 2017, more than 15,600 households countywide, or 15% of total households, were extremely low income. In the unincorporated County, an estimated 3,623 households were classified as extremely low income, representing 14% of households.[34]

Information on household income by household size is maintained by the U.S. Department of Housing and Urban Development (HUD) for each county and is updated annually. The California Department of Housing and Community Development (HCD) adjusts each county's median income to at least equal the state non-metropolitan county

[33] California Department of Housing and Community Development, effective April 26, 2021
[34] See footnote 24

median income. The State Income Limits for 2021 were published in April 2021 and are shown below.

Table H-2. 24: FY 2021 Marin County Income Limits (HCD)

Household Size	Extremely Low (<30% AMI)	Very Low (30%-50% AMI)	Low (50%-80% AMI)	Median	Moderate (80$-120% AMI)
1	38,400	63,950	102,450	104,700	125,650
2	43,850	73,100	117,100	119,700	143,600
3	49,350	82,250	131,750	134,650	161,550
4	54,800	91,350	146,350	149,600	179,500
5	59,200	98,700	158,100	161,550	193,850
6	63,600	106,000	169,800	173,550	208,200
7	68,000	113,300	181,500	185,500	222,600
8	72,350	120,600	193,200	197,450	236,950

Source: California Department of Housing and Community Development, State Income Limits for 2021, April 26, 2021.

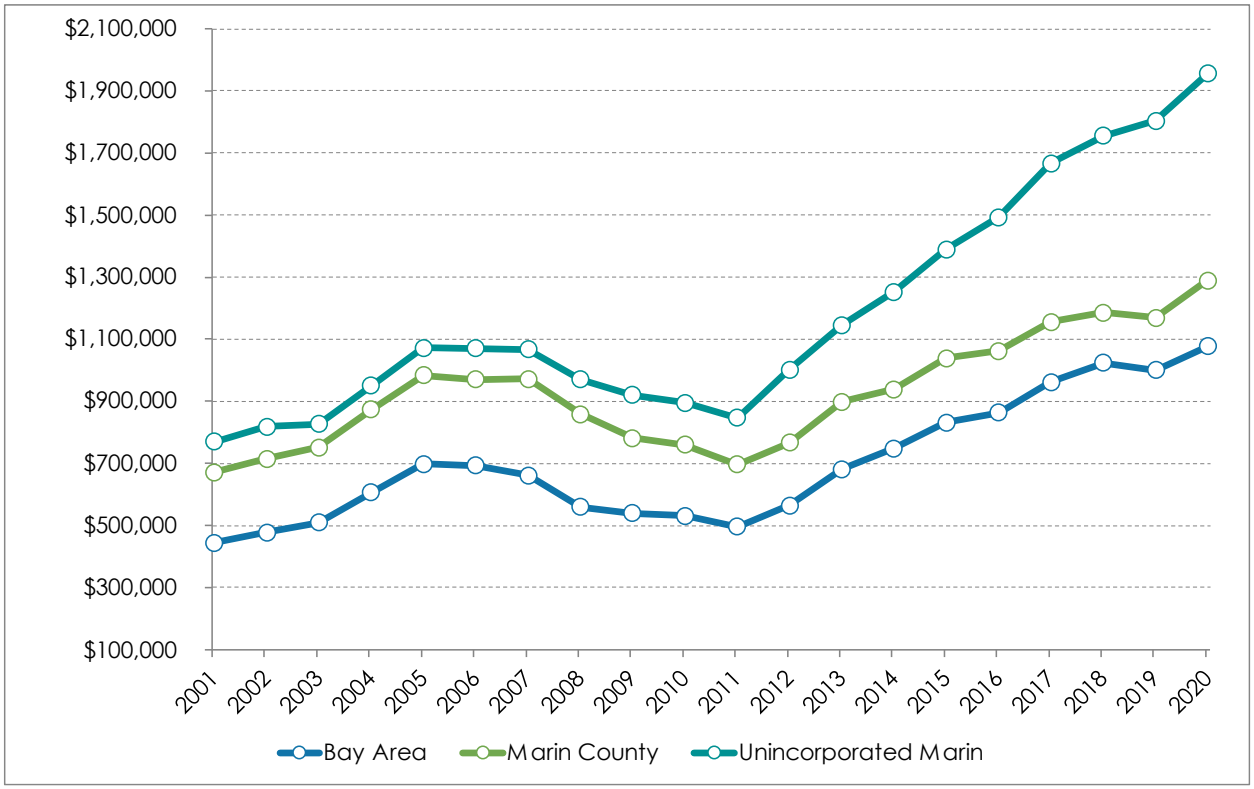
Note: AMI = Area Median Income

The "Median Income" schedule shown above is based on the FY2021 median family income for Marin County, CA of $149,600 for a four-person household. HCD adjusts each county's area median income to at least equal the state non-metropolitan county median income, as published by HUD.

Home Sales Prices

In December 2020, the typical home value in unincorporated Marin County was estimated at $1,955,764 per data from Zillow[35]. The largest proportion of homes were valued between $1 million to $1.5 million. By comparison, the typical home value is $1,288,807 in Marin County and $1,077,233 the Bay Area, with the largest share of units valued $750,000 to $1 million (county) and $500,000 to $750,000 (region).[36] After securing a 20% down payment, a household would need to be able to afford a monthly house payment of about $6,620 (plus utilities) to afford a home at the median value. This amount is above affordability for all low and moderate income households in unincorporated Marin.

Figure H-2.4: Home Values in Marin County and the Bay Area



Zillow data is also available by ZIP code, and recent trends are shown for the unincorporated communities in Table H-2.25: . In 2020, the range of home values was between $916,518 to $3,416,244, and all communities experienced significant increases in home values since 2013 (minimum of 29 % increase in value).

[35] Typical home value – Zillow describes the Zillow Home Value Index (ZHVI) as a smoothed, seasonally adjusted measure of the typical home value and market changes across a given region and housing type. The ZHVI reflects the typical value for homes in the 35th to 65th percentile range and includes all owner-occupied housing units, including both single-family homes and condominiums.

[36] Housing Needs Data Report: Unincorporated Marin. AGAG/MTC Staff and Baird+Driskell Community Planning, April 2, 2021.

Table H-2.25: Home Values, Unincorporated Communities

Community Name	Zip Code	Home Value - Dec. 2013	Home Value - Dec. 2020	% Change in Value
Black Point-Green Point	94945	$670,899	$927,428	38.2%
Northern Costal West Marin	94929	$757,012	$1,049,628	38.7%
	94971	$662,154	$961,486	45.2%
Central Coastal West Marin	94956	$827,089	$1,290,055	56.0%
	94937	$807,195	$1,271,424	57.5%
The San Geronimo Valley	94946	$1,322,537	$1,706,118	29.0%
	94963	$860,519	$1,234,562	43.5%
	94973	$677,232	$971,882	43.5%
	94938	$705,037	$1,025,663	45.5%
	94933	$645,740	$916,518	41.9%
Southern Coastal West Marin	94970	$1,744,475	$3,416,244	95.8%
	94924	$1,066,412	$1,656,332	55.3%
	94965	$1,036,162	$1,418,479	36.9%
Marinwood/Lucas Valley	94946	$1,322,537	$1,706,118	29.0%
	94903	$773,354	$1,144,075	47.9%
Santa Venetia/Los Ranchitos	94903	$773,354	$1,144,075	47.9%
Kentfield/Greenbrae	94904	$1,450,420	$2,001,013	38.0%
Strawberry	94941	$1,221,218	$1,744,308	42.8%
Tam Valley	94941	$1,221,218	$1,744,308	42.8%
Marin City	94965	$1,036,162	$1,418,479	36.9%

Source: Zillow, Zillow Home Value Index (ZHVI).
Notes: Zillow describes the ZHVI as a smoothed, seasonally adjusted measure of the typical home value and market changes across a given region and housing type. The ZHVI reflects the typical value for homes in the 35th to 65th percentile range. The ZHVI includes all owner-occupied housing units, including both single-family homes and condominiums. More information on the ZHVI is available from Zillow.
Note: Please refer to Table H-2.1: and Figure H-2.1 for the census designated places included in the unincorporated communities

Rental Prices

Similar to home values, rents have also increased dramatically across the Bay Area in recent years. The U.S. Census provides information on median contract rents. The following table shows these rents for the unincorporated communities and the unincorporated County in 2010 and 2019. The contract median rents in the unincorporated area increased from $1,536 a month in 2010 to $1,774 in 2010, representing a 15% increase. While information was not available for all of the unincorporated communities, the Black Point-Green Point area saw the largest rent increases, from $679 to $1,965 in a nine-year period.

Table H-2. 26: Median Contract Rents, Unincorporated Communities

Community/Area	2010	2019
Black Point-Green Point	$679	$1,965
Northern Coastal West Marin (Dillon Beach area)	n/a	$2,605
Central Coastal West Marin	$967-$1536	$1610 - $1858
The San Geronimo Valley (Woodacre and Lagunitas-Forest Knolls areas)	$1433-$2000	$1349-$2198
Southern Coastal West Marin	$1110-$2000	$1574-$1841
Marinwood/Lucas Valley	$2,000	$2,194
Santa Venetia/Los Ranchitos	$1,488	n/a
Kentfield/Greenbrae	$1,324	$2,091
Strawberry	$1,512	$2,089
Tam Valley	$2,000	$2,699
Marin City	$1,211	$1,622
Unincorporated Marin County	$1,536	$1,774

Sources: ABAG Housing Needs Data Packet ; 2015-2019 ACS, 2010 ACS Table B25058 (renter occupied housing units paying cash rent).

Note: Please refer to Table H-2.1: and Figure H-2.1 for the census designated places included in the unincorporated communities

Because the ACS data may not fully reflect current rent trends, an online rent survey was conducted in February 2022. The rents for apartments are shown Table H-2.27. The median rent for a one-bedroom apartment was $2,450 while the median rent for two-bedrooms was $3,151.

Table H-2.27: Apartment Rent Survey, Unincorporated County

# of Bedrooms	# Units Advertised	Rental Range	Median Rent
Apartments/Condos/Duplex			
1 Bedroom	9	$1,750-$3,800	$2,450
2 Bedrooms	8	$2,600-$7,000	$3,151

Sources: Rentcafe.com, Craigslist.com, Apartments.com; accessed 2/9/22

Only a few houses were listed for rent in February 2022. The prices were as follows:

- One-bedroom home listed at $2,650/month
- One-bedroom home listed at $2,800/month
- Two-bedroom home listed at $4,950/month
- Three-bedroom home listed at $7,995/month
- Four-bedroom home listed at $4,890/month

Housing Affordability by Household Income

Housing affordability is dependent upon income and housing costs. Using set income guidelines, current housing affordability can be estimated. According to the HCD income guidelines for 2021, the Area Median Income (AMI) in Marin County was $149,600 (adjusted for household size). Assuming that the potential homebuyer has sufficient credit and down payment (10%) and spends no greater than 30% of their income on housing expenses (i.e., mortgage, taxes and insurance), the maximum affordable home price and rental price can be determined. The maximum affordable home and rental prices for residents Marin County are shown in Table H-2.28 below.

Table H-2.28: Housing Affordability Matrix Marin County (2021)

Annual Income		Affordable Housing Cost		Utilities, Taxes and Insurance			Affordable Price	
		Rent	Own	Rent	Own	Taxes/ Insurance /HOA	Rent	Purchase
Extremely Low Income (30% of AMI)								
One Person	$38,400	$960	$960	$280	$306	$336	$680	$83,824
Small Family	$49,350	$1,234	$1,234	$329	$371	$432	$905	$113,659
Large Family	$59,200	$1,480	$1,480	$408	$476	$518	$1,072	$128,117
Very Low Income (50% of AMI)								
One Person	$63,950	$1,599	$1,599	$280	$306	$560	$1,318	$193,245
Small Family	$82,250	$2,056	$2,056	$329	$371	$720	$1,727	$254,556
Large Family	$98,700	$2,468	$2,468	$408	$476	$864	$2,060	$297,280
Low Income (80% of AMI)								
One Person	$102,450	$2,561	$2,561	$280	$306	$896	$2,281	$358,124
Small Family	$131,750	$3,294	$3,294	$329	$371	$1,153	$2,965	$466,544
Large Family	$158,100	$3,953	$3,953	$408	$476	$1,383	$3,545	$551,665
Moderate Income (120% of AM)								
One Person	$125,650	$3,141	$3,141	$280	$306	$1,099	$2,861	$457,480
Small Family	$161,550	$4,039	$4,039	$329	$371	$1,414	$3,710	$594,165
Large Family	$193,850	$4,846	$4,846	$408	$476	$1,696	$4,438	$704,768

1. Small family =3-person household.
2. Large family= 5-person household.
Source: California Department of Housing and Community Development, 2021 Income limits; and Veronica Tam and Associates.
Assumptions: 2021 HCD income limits; 30% gross household income as affordable housing cost; 35% of monthly affordable cost for taxes and insurance; 10.0% down payment; and 3.0% interest rate for a 30-year fixed-rate mortgage loan. Utilities based on the Marin Housing Authority Utility Allowance, 2021. Utility allowances based on the combined average assuming all electric and all natural gas appliances.

Comparing the information from Table H-2.28 with the rental and purchase prices described earlier in this section, the following assumptions can be made about affordability in Marin County:

- Home Purchases: Based on the home value range between $916,518 to $3,416,244 listed in Table II-25, purchasing a home is beyond the reach of all low and moderate income households. The affordability limit for a large moderate income family is $704,768.
- Home Rentals: The limited home rental information that was found included a range of $2,650 for a one-bedroom to $7,995.00 for a three-bedroom home. These rents are not affordable for lower income households. While a one-person moderate household can afford a one-bedroom home rental, larger households are not able to afford larger units.
- Apartment Rentals: The rental survey described above showed a median rent of $2,450 for a one-bedroom apartment and $3,151 for a two-bedroom unit. These rental prices are affordable for moderate income households.

The Housing Plan (Section 5) includes programs for the County to continue to try and facilitate affordable home ownership and rental housing. This includes the Below Market Rate Homeownership program and the Community Land Trust rental program.

Ability to Pay for Housing/Cost Burden

According to HUD, affordable housing costs should equal 30% or less of a household's income. Because household incomes and sizes vary, the affordable price for each household also varies. For example, a double income household with no children could afford a different level of housing cost than a large family with one lower income wage earner.

The cost of housing, particularly for homeownership, was a consistent theme in the public outreach for this Housing Element. The following is a summary of information from the community survey:

- 59% of respondents selected "Increase the amount of housing that is affordable to moderate, low, and very low income residents" as a top housing priority.
- 47% of respondents selected "Increase homeownership opportunities for moderate, low and very low income residents" as a top housing priority.
- 55% of survey respondents felt there was limited availability of affordable units
- Regarding insufficient housing in their community:
    - 59% selected insufficient housing for low income households
    - 35% selected insufficient housing for families with children
    - 34% selected insufficient housing for older adults.

Per federal criteria, households are considered to be overpaying, or cost burdened, when they pay more than 30% of their income for housing. Severe cost burden is when households spend 50% or more on housing. In 2019, approximately 20% of households in unincorporated Marin, Marin County and the Bay Area all experienced overpayment (Table H-2.29). Severe cost burden impacted 17% unincorporated Marin households, 18 % of Marin County households, and 16% in the Bay Area.

Table H-2.29: Cost Burden Severity

	0%-30% of Income Used for Housing		30%-50% of Income Used for Housing		50%+ of Income Used for Housing	
	Units	Percent	Units	Percent	Units	Percent
Unincorporated Marin	15,349	61.5%	5,195	20.8%	4,404	17.7%
Marin County	61,813	60.1%	21,630	21.0%	19,441	18.9%
Bay Area	1,684,831	63.1%	539,135	20.2%	447,802	16.8%

Source: ABAG Housing Needs Data Report, 2021.

Data is from the US Census Bureau, ACS 2015-2019, Tables B25070, B25091

Table H-2.30 examines cost burden in the unincorporated communities and illustrates that many communities experience both cost burden and severe cost burden at a greater rate than unincorporated Marin overall. Marin City holds the highest percentages, with approximately 25% of households cost burdened, and 25% severely cost burdened.

Table H-2.30: Cost Burden Severity, Unincorporated Communities

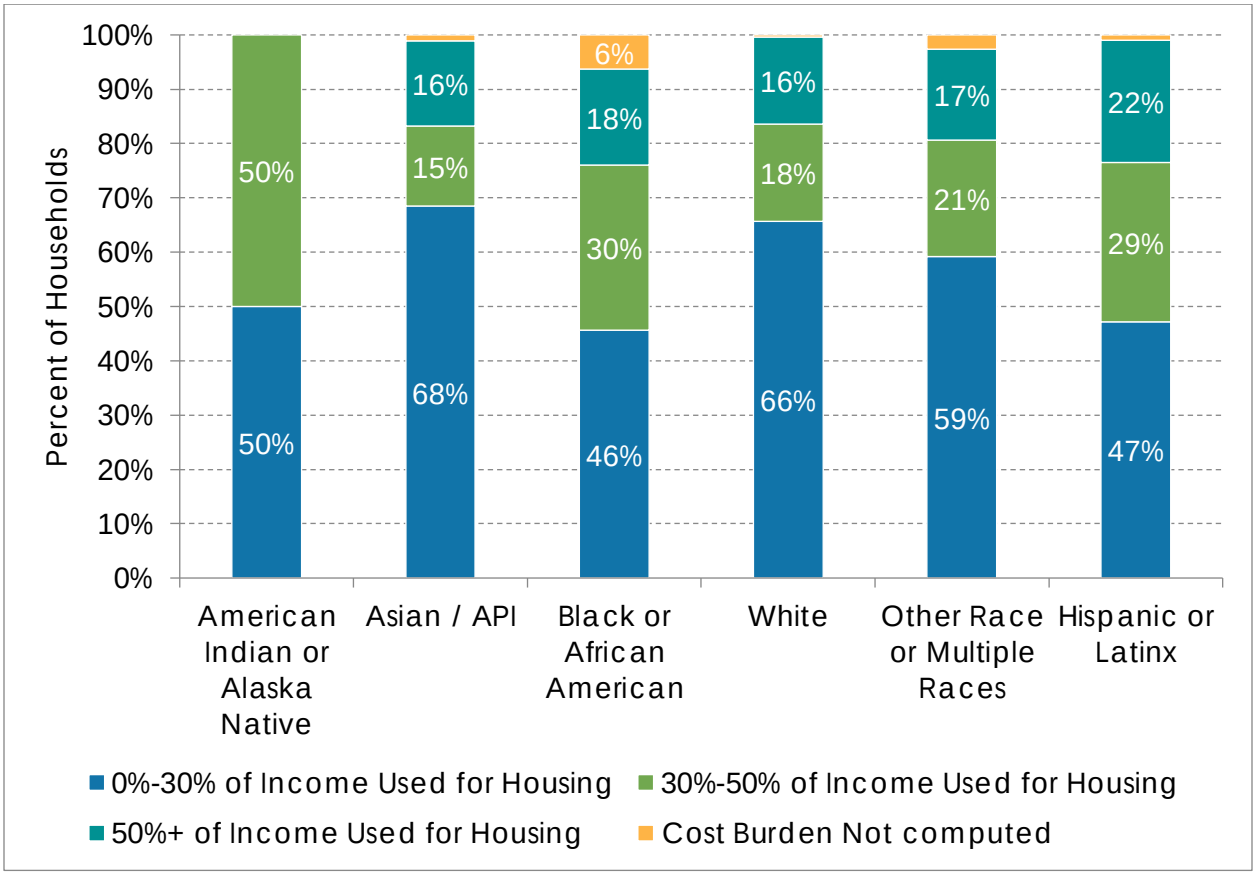
Community	0%-30% Income Used for Housing	Cost Burden 30-50%	Cost Burden 50%+
Black Point-Green Point	68.5%	15.2%	16.3%
Northern Costal West Marin	55.8%	25.6%	18.6%
Central Coastal West Marin	56.2%	19.2%	24.6%
The San Geronimo Valley	66.2%	17.1%	16.8%
Southern Coastal West Marin	55.5%	22.3%	22.1%
Marinwood/Lucas Valley	62.4%	23.3%	14.4%
Santa Venetia/Los Ranchitos	69.0%	18.8%	12.2%
Kentfield/Greenbrae	72.1%	11.6%	16.2%
Strawberry	61.1%	19.0%	19.9%
Tam Valley	71.9%	15.0%	13.1%
Marin City	49.8%	24.9%	25.3%

Source: U.S. Department of Housing and Urban Development (HUD), Comprehensive Housing Affordability Strategy (CHAS) ACS tabulation, 2013-2017 release
Note: Please refer to Table H-2.1: for the census designated places included in the unincorporated communities

The ABAG Housing Needs Data Repot shows that people of color often pay a greater percentage of their income on housing, and in turn, are at a greater risk of housing insecurity. Many factors contribute to this including federal and local housing policies that have historically excluded them from the same opportunities extended to white residents.[37] As shown in Figure H-2.5, American Indian or Alaska Native, Non-Hispanic residents are the most cost burdened with half of these residents spending 30% to 50% of their income on housing, and Hispanic or Latin residents are the most severely cost burdened with 22.5% spending more than 50% of their income on housing.

[37] Housing Needs Data Report: Unincorporated Marin. AGAG/MTC Staff and Baird+Driskell Community Planning, April 2, 2021.

Figure H-2.5: Cost Burden by Race/Ethnicity



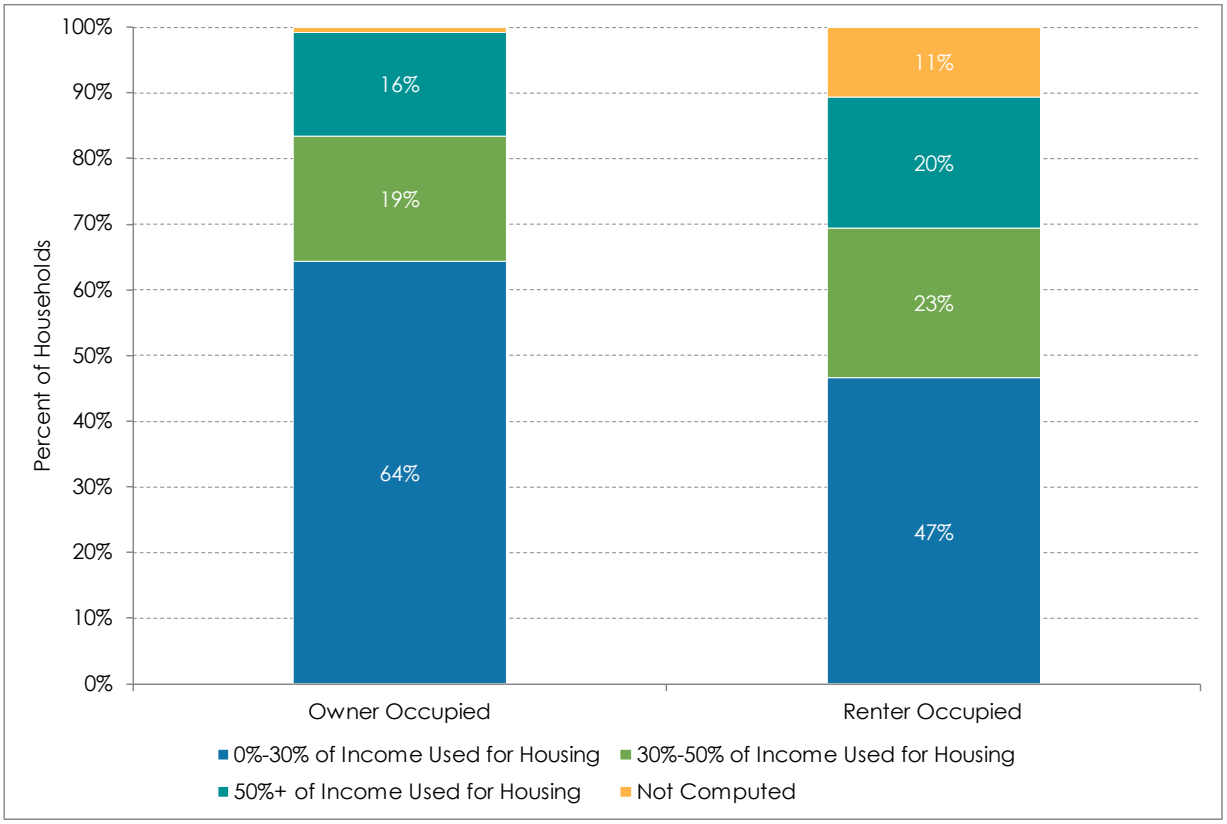
In addition to looking at overall cost burden, it is important to examine disparities between renter- and owner-households. Figure H-2.6 shows that 43% of unincorporated renter- households face cost burden issues compared to 35% of owner-households. Additionally, owner households are given tax breaks for mortgage interest payments, which renter households do not receive. The largest and often least recognized federal housing subsidy include mortgage and property tax deductions. However, recent changes to the federal tax law limit total State tax deductions to $10,000, which is significantly below the costs associated with mortgage interests and property taxes given the high costs of housing in California.

The AFFH appendix in this Housing Element found that trends of disproportionate housing problems and cost burdens for Black and Hispanic residents persist in the unincorporated County. About two-thirds of all Black and Hispanic households experience housing problems and a similar share also experience housing problems. Like in the County, owner households experience housing problems and cost burdens at lower rates than renter households. Also, owner housing problems and cost burden rates are similar for White, Black, and Asian owners, but higher for Hispanic households.

This means that Hispanic households experience housing problems and cost burdens at the highest rates regardless of tenure.

The income level of households also greatly impacts the ability to pay for housing. Table H-2.31 illustrates that due to high housing costs in the area, lower income households experience much greater levels of cost burden. As previously demonstrated, housing costs continue to outpace household incomes. The incidence of overpayment for very low, low, and moderate income households is likely to increase in the future.

Figure H-2.6: Cost Burden for Homeowners and Renters in Unincorporated Marin County



Source: ABAG Housing Needs Data Packet, 2021.

Data is from the US Census Bureau, ACS 2015-2019, Tables B25070, B25091

Table H-2.31: Income by Cost Burden, Unincorporated County

	Cost Burden > 30%	Percent	Cost Burden > 50%	Percent
Owners				
Household Income <= 30% AMI	4,675	21.5%	3,770	38.4%
Household Income >30% to <=50% AMI	3,695	17.1%	2,265	23.1%
Household Income >50% to <=80% AMI	4,280	19.7%	1,965	20.0%
Household Income >80% to <=100% AMI	2,780	12.8%	895	9.1%
Household Income >100% AMI	6,215	28.7%	910	9.3%
Total	21,645	100%	9,805	100%
Renters				
Household Income <= 30% AMI	7,290	40.6%	6,085	63.2%
Household Income >30% to <=50% AMI	4,605	25.6%	2,500	25.9%
Household Income >50% to <=80% AMI	4,245	23.6%	890	9.2%
Household Income >80% to <=100% AMI	985	5.5%	95	0.9%
Household Income >100% AMI	795	4.4%	55	0.6%
Total	17,920	100%	9,625	100%

Source: U.S. Department of Housing and Urban Development (HUD), Comprehensive Housing Affordability Strategy (CHAS) ACS tabulation, 2013-2017 release.

Note: Cost burden is the ratio of housing costs to household income. For renters, housing cost is gross rent (contract rent plus utilities). For owners, housing cost is "select monthly owner costs", which includes mortgage payment, utilities, association fees, insurance, and real estate taxes.

Table H-2. 32 below translates occupation incomes into affordable rents, by calculating the rents that households would pay if they were to spend 30 % of their income on housing (33% for owner-occupied housing). These numbers demonstrate that market prices for single-family homes are out of reach for many people who work in Marin County.

Table H-2. 32: Income by Occupation, Unincorporated County

Occupation	Average Hourly Wage	Average Annual Income**	Affordable Rent and Utilities
Very Low Income: <$73,100			
Dishwashers	$16.70	$34,734	$868.35
Landscaping and Groundskeeping Workers	$20.15	$41,913	$1,047.82
Retail Salesperson	$20.75	$43,163	$1,079.07
Construction Laborers	$26.56	$55,256	$1,381.40
Child, Family and School Social Workers	$26.61	$55,354	$1,383.85
Medical Assistant	$27.19	$56,562	$1,414.05
Passenger Vehicle Drivers, Except Bus Drivers	$27.78	$57,781	$1,444.52
Low Income: $73,100-$117,100			
Carpenters	$37.45	$77,910	$1,947.75
Paralegals and Legal Assistants	$39.36	$81,878	$2,046.95
Plumbers, Pipefitters, and Steamfitters	$40.25	$83,722	$2,093.05
Elementary School Teachers, Except Special Education		$92,217	$2,305.42
Firefighters	$49.24	$102,418	$2,560.45
Moderate Income: $117,100-$143,600			
Radiologic Technologists and Technicians	$56.31	$117,131	$2,928.27
Construction Supervisor	$56.45	$117,423	$2,935.57
Dental Hygienists	$66.55	$138,428	$3,460.70
Physician Assistant	$66.60	$138,533	$3,463.32

Source: California Employment Development Department 2021 (Q1) Occupation Profiles, San Rafael Metropolitan District.

**Income categories based on State 2021 Income Limits for 2-person household with one wage earner*

***Based on full-time employment*

The impact of housing cost burden on low income households can be significant regardless of tenure, as illustrated in Table H-2.31. In particular seniors, many large families, and single-parent or female-headed households are struggling with housing costs. The costs of health care, food, and transportation compound the difficulty of finding and maintaining affordable tenancy or homeownership.

As described in the Affirmatively Furthering Fair Housing (AFFH) appendix, The communities of Central Coastal West Marin and Marin City have the highest percentages of low and moderate income households (62 and 71%, respectively. In addition, both Central Coast West Marin and Marin City the highest percent of extremely low income households (29% and 40%, respectively). This makes the likelihood of housing cost burden much greater in these areas.

In addition to the income-restricted affordable housing units in the County, there are a number of resources and programs available to assist households with cost burdens, housing counseling or other housing problems. Many of these organizations were contacted for feedback and input in the outreach process for this Housing Element update (please refer to Appendix A , Public Outreach).

Overcrowding

Overcrowded housing is defined by the U.S. Census as units with more than one inhabitant per room, excluding kitchens and bathrooms. Units with more than 1.5 persons per room are considered severely overcrowded. In 2019, as shown in Table H-2.33, the incidence of overcrowding in unincorporated Marin County was 0.9% for owner-occupied units and 13.4% for rental units. Severe overcrowding impacted 0.4% of owner-occupied units and 5% of rental units. However, it is likely that these Census counts of overcrowding underestimated the actual occurrence, as households living in overcrowded situations were unlikely to provide accurate data on household members who might be living in the unit illegally or in violation of a rental agreement.

Table H-2.33: Overcrowding by Tenure, Unincorporated County

	Number of Occupied Units	Percentage of Units
Owner-Occupied:		
0.50 or less occupants per room	53,239	81.5%
0.51 to 1.00 occupants per room	11,454	17.5%
1.01 to 1.50 occupants per room	348	0.5%
1.51 to 2.00 occupants per room	129	0.2%
2.01 or more occupants per room	155	0.2%
Total	65,325	
Renter-Occupied:		
0.50 or less occupants per room	20,483	51.2%
0.51 to 1.00 occupants per room	14,096	35.3%
1.01 to 1.50 occupants per room	3,374	8.4%
1.51 to 2.00 occupants per room	1,647	4.1%
2.01 or more occupants per room	373	0.9%
Total	39,973	

Source: US Census Bureau, ACS 2015-19 Table B25014

Table H-2.34 shows overcrowding levels in the unincorporated Marin communities. For owner-occupied units, the highest levels of overcrowding are in Southern-Coastal West Marin (five %) and Santa Venetia/Los Ranchitos (4%). Both renter overcrowding and severe overcrowding is seen in the community of Marin City (11 % and nine %, respectively).

Table H-2.34: Overcrowded Households, Unincorporated Communities

Owner-Households	0.50 or less occupants per room	0.51 to 1.00 occupants per room	1.01 to 1.50 occupants per room	1.51 to 2.00 occupants per room	2.01 or more occupants per room
Black Point-Green Point	69.9%	28.3%	0.0%	1.8%	0.0%
Northern Costal West Marin	94.4%	5.6%	0.0%	0.0%	0.0%
Central Coastal West Marin	87.5%	12.5%	0.0%	0.0%	0.0%
The San Geronimo Valley	71.1%	27.9%	1.1%	0.0%	0.0%
Southern Coastal West Marin	78.9%	16.2%	5.0%	0.0%	0.0%
Marinwood/Lucas Valley	72.8%	25.4%	0.0%	1.8%	0.0%
Santa Venetia/Los Ranchitos	78.2%	17.5%	3.5%	0.9%	0.0%
Kentfield/Greenbrae	76.7%	22.1%	1.2%	0.0%	0.0%
Strawberry	82.7%	17.3%	0.0%	0.0%	0.0%
Tam Valley	78.9%	20.9%	0.2%	0.0%	0.0%
Marin City	70.8%	29.2%	0.0%	0.0%	0.0%
Unincorporated County	81.5%	17.5%	0.5%	0.2%	0.2%
Renter-Households	**0.50 or less occupants per room**	**0.51 to 1.00 occupants per room**	**1.01 to 1.50 occupants per room**	**1.51 to 2.00 occupants per room**	**2.01 or more occupants per room**
Black Point-Green Point	100.0%	0.0%	0.0%	0.0%	0.0%
Northern Costal West Marin	42.3%	36.5%	0.0%	0.0%	21.2 %
Central Coastal West Marin	50.5%	49.5%	0.0%	0.0%	0.0%
The San Geronimo Valley	65.9%	25.1%	0.0%	9.0%	0.0%

Table H-2.34: Overcrowded Households, Unincorporated Communities

Southern Coastal West Marin	68.1%	30.5%	1.4%	0.0%	0.0%
Marinwood/Lucas Valley	50.2%	49.8%	0.0%	0.0%	0.0%
Santa Venetia/Los Ranchitos	73.8%	26.2%	0.0%	0.0%	0.0%
Kentfield/Greenbrae	58.5%	39.7%	0.0%	1.8%	0.0%
Strawberry	60.3%	36.4%	2.0%	1.3%	0.0%
Tam Valley	57.7%	41.4%	0.9%	0.0%	0.0%
Marin City	53.9%	34.2%	11.1%	0.9%	0.0%
Unincorporated County	51.2%	35.3%	8.4%	4.1%	0.9%

Source: U.S. Census American Community Survey, 2015-2019, Table B25014.

Studies[38] show that overcrowding results in negative public health indicators, including increased transmission of tuberculosis and hepatitis and, most recently, COVID-19. In addition, studies show increases in domestic violence, sexual assault, mental health problems, and substance abuse related to overcrowded living conditions. Overcrowded conditions are common among large-family, single-parent, and female-headed households that subsist on low incomes. In addition, overcrowded conditions can sometimes occur on ranches that employ agricultural workers, especially during peak harvest times when seasonal or migrant workers are utilized.

Managers of income-restricted affordable units, whether private or through the Marin Housing Authority, must ensure that the unit is an appropriate size for the intended household size. For households participating in the Section 8 program, the Marin Housing Authority provides search assistance for the difficult to house and special needs populations, such as large households or households with a person with disabilities. The rehabilitation and replacement of agricultural units, undertaken by the Marin Workforce Housing Trust and California Human Development and funded by the Marin Community Foundation, USDA, State, and County sources, seek to improve health and safety conditions for agricultural workers. To qualify for the program, participating ranches must ensure quality maintenance and not allow overcrowding.

[38] Bashir, Samiya A. 2009. Home Is Where the Harm Is: Inadequate Housing as a Public Health Crisis

Special Needs Housing

Overview

In addition to overall housing needs, the County plans for housing for special needs groups, which includes seniors, people living with disabilities, people with HIV/AIDS and other illnesses, people in need of mental health care, single-parent families, singles with no children, large households, agricultural workers and their families, people experiencing homelessness, and the local workforce. To meet the community's special needs housing, Marin County must look to new ways of increasing the supply, diversity, and affordability of specialized housing stock.

A continuum of housing types addresses special needs, including independent living (owning or renting), supportive housing, assisted living, group home and skilled nursing facilities, transitional housing, residential treatment (licensed facilities), detoxification programs, Safe Haven, and emergency shelters. One of the most effective housing options for special needs housing is supportive housing where services are offered to tenants, often on site, to help achieve and maintain housing security. However, there is an inadequate supply of supportive housing units and affordable units in general to meet the needs of the community. This was a priority issue in the focus groups and community survey for the Housing Element update.

Seniors

The need for senior housing can be determined by age distribution, housing characteristics and demographic projections. On a countywide level, these determinants indicate that Marin County (ACS 5-Year Estimates):

- Has one of the oldest populations in the State, with 22% of the population over 65 years old and a median age of 46.8, compared to 14% of the population over 65 and a median age of 36.5 statewide
- Over one-third of County households have at least one senior present, 26% of households are senior homeowners, and eight % of households are senior renters (Table H-2.35)
- The majority of the existing housing stock are single-family homes (Table H-2.14 and Table H-2.15)

The proportion of seniors out of the total population and out of households in unincorporated Marin are similar to those countywide, with 22% of of the unincorporated population over 65 years old and 37% of households with at least one person over 65 years old present (Table H-2.35). Within the unincorporated County, the Central Coastal West Marin, Valley, and Southern Coastal West Marin communities have

the oldest populations; over one-third of their populations are over 65 years old and about 50% of their households have at least one senior present.

Table H-2.35: Senior Population or Households by Tenure

Community	Population	All HHs	Owner HHs	Owner Living Alone	Renter HHs	Renter Living Alone
Black Point- Green Point	29.8%	41.5%	35.7%	11.8%	5.8%	4.4%
Northern Costal West Marin	22.5%	32.5%	22.2%	18.4%	10.4%	10.4%
Central Coastal West Marin	47.7%	55.3%	41.5%	19.9%	13.8%	13.1%
The San Geronimo Valley	30.6%	46.4%	39.1%	15.2%	7.3%	5.3%
Southern Coastal West Marin	42.3%	54.2%	44.8%	16.2%	9.4%	5.5%
Marinwood/Lucas Valley	22.7%	38.7%	35.1%	10.7%	3.6%	3.6%
Santa Venetia/ Los Ranchitos	24.6%	37.6%	31.8%	19.6%	5.8%	4.8%
Kentfield/ Greenbrae	20.7%	34.5%	28.9%	6.7%	5.6%	5.2%
Strawberry	19.3%	34.4%	17.1%	7.5%	17.2%	16.6%
Tam Valley	19.3%	30.7%	28.2%	8.3%	2.5%	1.1%
Marin City	9.8%	16.8%	8.6%	5.0%	8.3%	4.4%
Unincorporated County	22.2%	36.7%	30.3%	10.1%	6.4%	4.8%
Marin County	21.6%	34.6%	26.3%	10.2%	8.3%	5.9%

HHs = Households

Source: American Community Survey, 2015-2019. Tables B25011 and Table B01001; Association of Bay Area Governments (ABAG) Housing Needs Data Packet : Marin County, 2021

Note: Please refer to Table H-2.1: and Figure H-2.1 for the census designated places included in the unincorporated communities.

However, the figures above alone do not account for the types of accommodations necessary to provide for the older population. Given that senior income drops precipitously with age and Marin County is one of the most expensive places for seniors to live, particular needs include smaller and more efficient housing, barrier-free and accessible housing, and a wide variety of housing with health care and/or personal

services provided.[39] In addition, a continuum of care is needed as older adult households develop health care needs.

According to the 2013-2017 CHAS data, there were 104,840 households in Marin County, of which 39,980 (38%) had had a householder aged 65 or older. Of these households, 41% had lower incomes (less than 80% AMI). In the unincorporated County, of the 10,398 senior households in the unincorporated County, 4,840 (47%) had lower incomes. The percentage of senior households with lower incomes (47%) is also higher than the unincorporated County's overall share of lower income households (38%).

Understanding how seniors might be cost burdened is of particular importance due to their special housing needs, particularly for low income seniors. According to ABAG's Housing Needs Report for Marin County, 55% of seniors making less than 30% of AMI are spending more than 30% of their income on housing (Table H-2.36). For seniors making more than 100% of AMI, only four percent are cost burdened, spending more than 30% of their income on housing.

Table H-2.36: Cost-Burdened Senior Households by Income Level

Income Group	0%-30% of Income Used for Housing	30%-50% of Income Used for Housing	50%+ of Income Used for Housing	Total Senior Households
0%-30% of AMI	7.1%	15.3%	49.7%	16.4%
31%-50% of AMI	10.3%	20.3%	21.3%	14.2%
51%-80% of AMI	14.2%	19.8%	17.8%	15.9%
81%-100% of AMI	8.3%	17.7%	6.9%	9.9%
Greater than 100% of AMI	60.1%	26.9%	4.3%	43.6%
Totals	6,504	2,008	1,886	10,398

Notes:
-For the purposes of this graph, senior households are those with a householder who is aged 62 or older.
-Cost burden is the ratio of housing costs to household income. For renters, housing cost is gross rent (contract rent plus utilities). For owners, housing cost is "select monthly owner costs", which includes mortgage payment, utilities, association fees, insurance, and real estate taxes. HUD defines cost-burdened households as those whose monthly housing costs exceed 30% of monthly income, while severely cost-burdened households are those whose monthly housing costs exceed 50% of monthly income.

[39] Elder Economic Security Standard by County 2007, Center for Community and Economic Development.

-Income groups are based on HUD calculations for Area Median Income (AMI). HUD calculates the AMI for different metropolitan areas, and the nine county Bay Area includes the following metropolitan areas: Napa Metro Area (Napa County), Oakland-Fremont Metro Area (Alameda and Contra Costa Counties), San Francisco Metro Area (Marin, San Francisco, and San Mateo Counties), San Jose-Sunnyvale-Santa Clara Metro Area (Santa Clara County), Santa Rosa Metro Area (Sonoma County), and Vallejo-Fairfield Metro Area (Solano County). The AMI levels in this chart are based on the HUD metro area where this jurisdiction is located.
Source: U.S. Department of Housing and Urban Development (HUD), Comprehensive Housing Affordability Strategy (CHAS) ACS tabulation, 2013-2017 release in the Association of Bay Area Governments (ABAG) Housing Needs Data Packet: Marin County, 2021

In many cases, seniors are living in large, oversized houses. Housing types to meet the needs of seniors include smaller attached or detached housing for independent living (both market rate and below market rate), Accessory Dwelling Units, age-restricted subsidized rental developments, shared housing, congregate care facilities, licensed facilities, Alzheimer's and other specialty facilities, and skilled nursing homes. There is also a need for senior housing where an in-home caregiver can reside.

In addition, the nexus between living arrangements for seniors and senior-oriented services must reinforce the ability for seniors to achieve a high quality of life, with access to local amenities, transportation, choices in housing, health care, and activities, and full integration into the community. A well-balanced community is one in which these elements are implicit and guaranteed for all members of the community, with particular recognition of the needs of specific demographic groups such as seniors. As such, the Older Americans Act provides funding for services that:

- Enable older individuals to secure and maintain independence and dignity in their homes
- Remove barriers to personal and economic independence
- Provide a continuum of care for vulnerable older persons
- Secure the opportunity for older individuals to receive managed in-home care and community- based long-term care services

The County's Division of Aging and Adult Services supports a variety of services that are provided to a network of local nonprofit organizations and governmental agencies throughout Marin County. Table H-2.37 below summarizes available senior services.

Table H-2.37: Countywide Services Offered for Seniors: 2021

Service	Description
Aging and Disability Resource Connection/ One Door	Streamlines access to services though a person-centered interactive network of agencies with coordinated points of entry.
Assisted transportation	Provides assistance and transportation to persons who have difficulties (physical or cognitive) using regular vehicular transportation.
Caregiver registry	Maintains a list of qualified workers to refer to clients and follow-up to assure service was received.
Congregate meals	Serves healthy meals in a group setting, helping to maintain and improve physical, psychological, and social well-being. Can also be served as grab-and-go.
Elder abuse prevention	Educates the public and professionals to develop, strengthen and carry out programs that prevent and detect elder abuse.
Employment Services	Assists clients in maintaining or obtaining full-time employment through job development and skill training.
Family Caregiver Support	Provides emotional support, education, training, and respite care for family caregivers.
Health Insurance Counseling and Advocacy Program	Provides formation and counseling on Medicare, Medi-Cal, managed care and long- term care.
Health promotion and disease prevention	Evidence-based health promotion programs that can prevent and mitigate chronic disease.
Home-Delivered Meals	Delivers nutritious meals to home-bound clients while providing personal contact.
Information and Assistance	Links older adults and their family members to appropriate services through information and referrals.
Legal Assistance	Provides seniors with legal services and education on older persons' rights, entitlements, and benefits.
Long-Term Care Ombudsman	Ensures the rights and protection of older persons at risk for abuse, neglect or exploitation while living in long-term care facilities.

Table H-2.37: Countywide Services Offered for Seniors: 2021

Service	Description
Nutrition Education	Promotes better health by providing accurate and culturally sensitive nutrition information and educational materials.
Rural Case Management	Assesses client needs and assists in development of care plans and coordination of services among providers.
Rural visiting	Provides contact and safety checks through visiting and support.
Senior Center Activities	Provides education and activities, including trips that enhance both health and well-being.

Source: Marin County Aging and Adult Services

The County's Human and Health Services website also has an online Community Resource Guide residents can browse for information, services, and resources. A direct link to the guide is here: https://www.marinhhs.org/community-resource-guide

Many seniors in Marin County are over-housed, which means living in a home far larger than they need. This phenomenon will become more pronounced in the coming years, as the unincorporated County's population will continue to age. According to the ACS 5-year estimates, approximately 32% of the current population is between the ages of 45 and 65 years old. These residents will become part of the senior population over the next twenty years. During the public outreach for this Housing Element, insufficient housing options for seniors was one of the top concerns. Some may be willing to vacate their home for a smaller unit, thus increasing housing options for families. A program has been included in this Housing Element for the County to pursue a variety of housing options for seniors. The goal is to allow seniors to trade down their current homes for other housing that requires less maintenance, is designed to accommodate the mobility needs of seniors, and is more affordable.

The Age-Friendly County of Marin Action Plan from January 2020 looked at how the County can interact and work together for a community that is experiencing a rapid growth rate among its older generations. Through the public outreach for this plan, which included surveys, interviews and focus groups, the following challenges emerged regarding older adults:

- Lack of affordable housing impacts older adults and their families as well as the local workforce.

- Limited accessible housing stock means older adults must invest more into home modifications and take greater risks in order to age in place.
- Older renters have a greater challenge in homes and units that need age-friendly modifications.

Low and very low income seniors often cannot afford the cost of licensed facilities in Marin County. According to the Marin County Health and Human Services, long-term care in a licensed Residential Care Facility for the Elderly costs anywhere from $4,500 - $9,500 a month and higher.[40] The lower range would be a shared room in a small facility with fewer amenities and the higher range would be for a private apartment with higher levels of care in a facility with a lot of amenities.

Through a 2003 County ordinance, the development of licensed senior facilities, such as assisted living facilities, is subject to the jobs/housing linkage fee, whereby funds are contributed to the County's Affordable Housing Trust Fund based on the number of low and moderate income jobs anticipated for the new development.

Marin County's Aging and Adult Services office acts as the Area Agency on Aging for Marin County, and publishes an Area Plan every four years. The Area Plan involves qualitative and quantitative research on the demographics, experiences and perspectives of older adults in their service area of Marin County.

People Living with Disabilities

People living with disabilities represent a wide range of housing needs, depending on the type and severity of their disability. Special consideration should be given to income and affordability, as many people with disabilities are living on fixed incomes. Some of the considerations and accommodations that are important in serving individuals and families with disabilities are: (1) the design of barrier-free housing, (2) accessibility modifications, (3) proximity to services and transit, (4) on-site services, and (5) mixed income diversity and group living opportunities.

Some people with disabilities can live most successfully in housing that provides a semi-independent living state, such as clustered group housing or other group-living quarters; others are capable of living independently if long-term services and support are available. available. Different types of housing that can serve these populations include: (1) single-room occupancy (SRO) units, (2) single-family and group homes specifically dedicated to each population and their required supportive services, (3) set-asides in larger, more traditional affordable housing developments, and (4) transitional housing or crisis shelters.

[40] Information from the County Health and Human Services, Supervisor of the Long-Term Care Ombudsman Program. Example: Villa Martin ($165/day or $5,115 per month for Assisted Living or Skilled Nursing. $330/day or $10,230/month if medical exclusion/preexisting condition).

Federal sources of financing could include Multi-family Housing/Supportive Housing, Mental Health Services Act, Transitional Age Youth, and Section 8 project-based vouchers, which can be leveraged with local funds.

As the population ages, the need for accessible housing will increase. Consideration can be given to accessible dwelling conversion (or adaptability) and appropriate site design. Incorporating barrier-free design in all new multi-family housing is especially important to provide the widest range of choice and is often required by State and federal fair housing laws. Barriers to applying for building and planning approvals for reasonable accommodation modifications to units could be removed by providing over-the-counter approvals and streamlining the application process.

The unincorporated County's population with a disability is similar to that of the County and Bay Area. According to 2019 ACS data, approximately 9.2% of the unincorporated County's population has a disability of some kind[41], compared to 9.1% and 9.6% of Marin County and the Bay Area's population. Table H-2.38 shows the rates at which different disabilities are present among residents of unincorporated Marin County and its community areas. Among the unincorporated County communities, the San Geronimo Valley, Marinwood/Lucas Valley, Santa Venetia/Los Ranchitos, and Marin City have a higher proportion of persons with a disability than the unincorporated County. However, across all communities, ambulatory difficulties were the most prominent.

[41] These disabilities are counted separately and are not mutually exclusive, as an individual may report more than one disability. These counts should not be summed.

Table H-2.38: Persons with Disabilities by Disability Type

Community	With Disability	With a Hearing Difficulty	With a Vision Difficulty	With a Cognitive Difficulty	With an Ambulatory Difficulty	With a Self-Care Difficulty	With an Independent Living Difficulty
Black Point-Green Point	9.4%	4.6%	0.6%	2.2%	4.3%	2.0%	4.0%
N. Costal West Marin	5.8%	3.8%	2.0%	3.8%	5.8%	3.8%	3.8%
Central Coastal West Marin	10.3%	3.4%	2.2%	1.6%	4.3%	0.9%	1.6%
The San Geronimo Valley	11.2%	4.7%	2.8%	4.2%	7.2%	2.2%	2.6%
Southern Coastal West Marin	6.9%	3.1%	0.6%	2.1%	2.4%	0.0%	0.2%
Marinwood/Lucas Valley	12.0%	3.3%	1.4%	3.2%	6.8%	1.9%	6.7%
Santa Venetia/Los Ranchitos	16.0%	3.0%	4.7%	7.4%	8.1%	4.5%	9.5%
Kentfield/Greenbrae	7.1%	2.1%	0.5%	2.5%	2.9%	2.3%	3.6%
Strawberry	7.6%	2.2%	0.6%	2.0%	3.6%	2.1%	1.6%
Tam Valley	8.6%	3.0%	1.8%	2.5%	3.1%	1.8%	2.3%
Marin City	12.6%	0.4%	2.7%	6.1%	4.8%	1.9%	6.2%
Unincorporated	9.2%	2.6%	1.4%	2.8%	4.0%	1.7%	3.0%

Source: American Community Survey 5-Year Estimates, 2015-2019:

Note: Please refer to Table H-2.1 for the census designated places included in the unincorporated communities

Senate Bill 812, which took effect January 2011, requires housing elements to include an analysis of the special housing needs of the developmentally disabled in accordance with Government Code Section 65583(e). Developmental disabilities are defined as severe, chronic, and attributed to a mental or physical impairment that begins before a person turns 18 years old. This can include Down's Syndrome, autism, epilepsy, cerebral palsy, and mild to severely impaired intellectual and adaptive functioning. Some people with developmental disabilities are unable to work, rely on Supplemental Security Income, and/or live with family members. In addition to their specific housing needs, they are at increased risk of housing insecurity after an aging parent or family member is no longer able to care for them.

The California Department of Developmental Services is responsible for overseeing the coordination and delivery of services to more than 330,000 Californians with developmental disabilities. While there are no estimates of the population with developmental disabilities, according to the ABAG Housing Needs report, as of 2020 the

California Department of Developmental Services served 384 individuals with a developmental disability in the unincorporated County. Of these individuals with a developmental disability, children under the age of 18 made up 29%, while adults accounted for 71%. The Department of Developmental Services estimated that a majority (57%) of individuals with developmental disabilities resided with a parent/guardian, while 21% live in independent/ supportive living facilities and 17% in community care facilities (Table H-2.39Table H-2.39:).

Table H-2.39: Population with Developmental Disabilities by Residence

Residence Type	% of Persons Served
Home of Parent /Family /Guardian	56.7%
Independent /Supported Living	21.2%
Community Care Facility	17.1%
Intermediate Care Facility	2.5%
Other	2.2%
Foster /Family Home	0.3%
Totals	363

Notes:
-The California Department of Developmental Services provides ZIP code level counts. To get jurisdiction-level estimates, ZIP code counts were cross walked to jurisdictions using census block population counts from Census 2010 SF1 to determine the share of a ZIP code to assign to a given jurisdiction.
- Totals differed at source (i.e. total Population with Developmental Disabilities by age as presented in ABAG's Housing Needs Report was 384).
Source: California Department of Developmental Services, Consumer Count by California ZIP Code and Residence Type (2020)

The total number of persons served in unincorporated County communities cannot be estimated because the Department of Developmental Services does not give exact number of consumers when fewer than 11 persons are served (Table H-2.40Table H-2.40). However, based on the September 2020 Quarterly Consumer Reports, the communities of Marinwood/Lucas Valley, Santa Venetia/Los Ranchitos, and Black –Point - Green Point have the greater population of persons with developmental disabilities, as evidenced by the higher number of consumers from their ZIP codes.

Table H-2.40: Consumer Count by California ZIP Code and Age Group

Community	CPD	Zip Code	0-17 yrs	18+ yrs	Total
Black Point-Green Point	Black Point – Green Point	94945	39	91	130
Northern Costal West Marin	Dillon Beach	94929	0	<11	>0
	Tomales	94971	0	0	0
Central Coastal West Marin	Point Reyes Station	94956	<11	<11	>0
	Inverness	94937	0	<11	>0
The San Geronimo Valley	Nicasio	94946	<11	<11	>0
	San Geronimo Valley	94963	0	<11	>0
	Woodacre	94973	<11	<11	>0
	Lagunitas	94938	0	0	0
	Forest Knolls	94933	<11	<11	>0
Southern Coastal West Marin	Stinson Beach	94970	0	0	0
	Bolinas	94924	<11	<11	>0
	Muir Beach	94965	12	25	37
Marinwood/Lucas Valley	Lucas Valley	N/A	N/A	N/A	N/A
	Marinwood	94903	62	223	285
Santa Venetia/ Los Ranchitos	Santa Venetia	94903	62	223	285
Kentfield/Greenbrae	Kentfield	94904	17	16	33
Strawberry	Strawberry	95375	0	0	0
Tam Valley	Tamalpais-Homestead Valley	94941	32	67	99
Marin City	Marin City	94965	12	25	37

Source: California Department of Developmental Services, Consumer Count by California ZIP Code and Residence Type (2020)

Note: Please refer to Table H-2.1 and Figure H-2.1 for the census designated places included in the unincorporated communities

The needs of individuals with developmental disabilities are similar to those with other disabilities, and they face similar challenges in finding affordable housing. Many individuals with developmentally disabilities are on fixed incomes and cannot afford market rate rents. In addition, supportive services are often beneficial to maintain housing stability.

Large Families

Large-family households are defined by the U.S. Census Bureau as households containing five or more persons. The 2019 ACS data reflect that 7% of Marin's households meet the definition of a large family (five or more people) and that over half (55%) of large-family households in the County live in owner-occupied homes (Table H-2.41Table H-2.41). In the unincorporated area of the County, there are about 2,071 large-family households, which make up 8% of all households in the unincorporated County. Of these households, 69% are owner-occupied households and 31% are renters.

Among the community areas, Black Point-Green Point, Marinwood/Lucas Valley, and Kentfield/ Greenbrae have the highest percentages of large family households. In these communities, over 10% of households have five or more persons.

Table H-2.41: Large-Family Households (5 or more persons) by Tenure

Community	Owner-Occupied Households		Renter-Occupied Households		Total Large Family Households		Total Households
	Number	Percent	Number	Percent	Number	Percent	Number
Black pPoint-Green Point	54	80.6%	13	19.4%	67	10.9%	617
Northern Costal West Marin	9	100.0%	0	0.0%	9	4.2%	212
Central Coastal West Marin	0	0.0%	0	0.0%	0	0.0%	853
The San Geronimo Valley	67	56.3%	52	43.7%	119	7.9%	1,500
Southern Coastal West Marin	11	100.0%	0	0.0%	11	1.1%	1,026
Marinwood/ Lucas Valley	227	74.7%	77	25.3%	304	12.6%	2,412
Santa Venetia/ Los Ranchitos	128	88.3%	17	11.7%	145	8.4%	1,717
Kentfield/ Greenbrae	258	87.5%	37	12.5%	295	11.5%	2,567
Strawberry	110	75.9%	35	24.1%	145	6.1%	2,391
Tam Valley	270	71.2%	109	28.8%	379	8.2%	4,617

Table H-2.41: Large-Family Households (5 or more persons) by Tenure

Community	Owner-Occupied Households		Renter-Occupied Households		Total Large Family Households		Total Households
	Number	Percent	Number	Percent	Number	Percent	Number
Marin City	10	20.8%	38	79.2%	48	3.5%	1,377
Unincorporated Marin	1,434	69.2%	637	30.8%	2,071	8.0%	25,850
Marin County all	4,150	54.9%	3,411	45.1%	7,561	7.2%	105,432

Source: American Community Survey 5-Year Estimates, 2015-2019, Table B25009.

Note: Please refer to Table H-2.1: and Figure H-2.1 for the census designated places included in the unincorporated communities

Housing Units Available for Large Families

The unit sizes available in a community affect the household sizes that can access that community. Large families are generally served by housing units with three or more bedrooms, of which there are an estimated 17,363 units in unincorporated Marin County, accounting for 67% of housing stock. Among these large units with three or more bedrooms, 85% are owner-occupied and 15% are renter-occupied (Table H-2.42). The unincorporated County has a higher percentage of housing units with three or more bedrooms than the County as a whole (67% and 58%, respectively). The communities of Central Coast West Marin, The San Geronimo Valley, Southern Coastal West Marin, Strawberry, and Marin City have a significantly lower share of housing units with three or more bedrooms than other communities and the unincorporated County. Table H-2.42 also illustrates the shortage of large units is primarily in the rental category, as the share of the housing stock with three or more bedrooms is less than 21% for all areas but Marin City.

Table H-2.42: Units with Three or More Bedrooms by Tenure

Community	Owner Units		Renter Units		Total Units with 3+ Bedrooms	
	Number	Percent	Number	Percent	Number	Percent
Black Point-Green Point	410	91.1%	40	8.9%	450	72.9%
Northern Costal West Marin	137	81.5%	31	18.5%	168	79.2%
Central Coastal West Marin	211	79.0%	56	21.0%	267	31.3%
The San Geronimo Valley	694	92.7%	55	7.3%	749	49.9%
Southern Coastal West Marin	324	81.8%	72	18.2%	396	38.6%
Marinwood/Lucas Valley	1,956	91.6%	179	8.4%	2,135	88.5%
Santa Venetia/ Los Ranchitos	1,165	90.6%	121	9.4%	1,286	74.9%
Kentfield/ Greenbrae	1,871	92.4%	154	7.6%	2,025	78.9%
Strawberry	913	83.8%	177	16.2%	1,090	45.6%
Tam Valley	2,777	84.2%	520	15.8%	3,297	71.4%
Marin City	175	41.2%	250	58.8%	425	30.9%
Unincorporated Marin	14,833	85.4%	2,530	14.6%	17,363	67.2%
Marin County	52,576	85.4%	9,012	14.6%	61,588	58.4%

Source: Source: American Community Survey 5-Year Estimates, 2015-2019, Table B25009, Table B25042.

Note: Please refer to Table H-2.1: and Figure H-2.1 for the census designated places included in the unincorporated communities

Although enough units appear to be available to meet the demand for large households (i.e., there are 2,071 large family households and 17,363 units with three or more bedrooms), available large units may be unaffordable to large families (see income section/refer to income section), or as is the case in many jurisdictions, large units are not always occupied by large-family households. Due to the limited supply of adequately sized rental units and affordable homeownership opportunities to accommodate large-family households, large families face additional difficulty in locating housing that is adequately sized and affordably priced. As mentioned in the Seniors section above, many older residents are aging in place and are “overhoused”, which may further limit the availability of units for larger households. In Marin County, adequate market-rate homeownership opportunities exist, but these homes are out of reach economically for moderate and low income families.

The AFFH Appendix of this Housing Element found that large renter households experience a greater rate of housing problems with physical defects (lacking complete kitchen or bathroom or are living in overcrowded conditions) compared to other renter households.

Female-Headed and Single-Parent Households

Households headed by one person are often at greater risk of housing insecurity, particularly female-headed households, who may be supporting children or a family with only one income. Female-headed households fall into one of three primary groups in Marin County: single professional women, single parents, and seniors. The last two groups in particular may have a need for affordable housing. The housing needs of senior residents are discussed above in the section on Seniors. The needs of female-headed households with children are particularly acute. As stated in the ABAG Housing Needs Data Packet, female-headed households with children may face particular housing challenges, with pervasive gender inequality resulting in lower wages for women. Moreover, the added need for childcare can make finding a home that is affordable more challenging. The need for additional housing options for families with children was a priority identified by community members during the Housing Element public outreach process.

As shown in Table H-2.43, there are a total of 25,850 households in the unincorporated area of the County, of which 6,745 (26%) are female-headed households. Moreover, approximately 800 (3%) of the total households are female-headed households with children under the age of 18. The percent of family households living in poverty that are female headed in the unincorporated County is less than 1% (approximately 150 households), which is lower than the 3% (approximately 480) of all family households overall that are living in poverty. Compared to the County, unincorporated County has a lower percentage of female headed households, female-headed households with children, and lower rates of poverty for all families and for female-headed households.

Table H-2.43: Female-Headed County and Marin County

	Unincorporated	Marin County
Total households	25,850	105,432
Total Female-Headed Households	26.1%	28.2%
With children	3.1%	3.3%
Total Families	17,061	66,052
Total families under the poverty level	2.8%	3.8%
Female-Headed Households under the poverty level	0.9%	1.5%
With children	0.6%	1.1%

Source: American Community Survey, 5-Year Estimates 2015-2019, Tables DP02 and B17012.

Within the unincorporated County, Marin City has the highest percentage of female-headed households (42% of all households are female-headed households) and female-headed households with children (11%). Marin City also has the highest poverty rates compared to all community areas and the unincorporated County; about 16% of all family households are living below the federal poverty line. Female-headed households also have higher rates of poverty (11%) in Marin City compared to other community areas. About 6% of all households in the Marin City are female-headed family household with children living below the poverty line. As discussed earlier in this chapter, Marin City also has one of the highest percentage of non-white residents.

Table H-2.44: Female-Headed Households (FHH) - Unincorporated County Communities

Community	Total households (HH)	Total FHH	FHH w/ children	Total Families	Total families under the poverty level	FHH under the poverty level	FHH w/ child
Black Point-Green Point	617	12.0%	0.0%	419	1.9%	0.0%	0.0%
Northern Costal West Marin	212	36.8%	0.0%	129	0.0%	0.0%	0.0%
Central Coastal West Marin	853	39.4%	0.0%	381	4.2%	1.6%	0.0%
The San Geronimo Valley	1,500	28.9%	2.4%	769	6.2%	0.0%	0.0%
Southern Coastal West Marin	1,026	32.0%	1.2%	451	4.7%	1.8%	0.0%
Marinwood/Lucas Valley	2,412	25.9%	2.0%	1,762	3.2%	1.0%	1.0%
Santa Venetia/Los Ranchitos	1,717	34.7%	1.2%	1,051	0.0%	0.0%	0.0%
Kentfield/Greenbrae	2,567	20.6%	3.7%	1,874	2.2%	0.6%	0.6%
Strawberry	2,391	36.2%	7.2%	1,348	2.7%	0.9%	0.9%
Tam Valley	4,617	24.6%	3.9%	3,202	1.9%	0.0%	0.0%
Marin City	1,377	42.0%	10.5%	698	16.3%	10.5%	6.3%

FHH = Female-Headed Households

Source: American Community Survey, 5-Year Estimates 2015-2019, Tables DP02 and B17012.

Note: Please refer to Table H-2.1: and Figure H-2.1 for the census designated places included in the unincorporated communities

Agricultural Workers

Marin's agricultural history remains a strong value and source of pride, particularly in the Coastal and Inland Rural Corridors of the County. According to the United States Department of Agriculture (USDA), Marin County farms and ranches encompass approximately 140,075 acres, or about 41% of the County's total land area; land in farms decreased by 18% from 2012 to 2017.[42] Rural West Marin has an economic base of cattle ranches, dairies, organic vegetable farms, poultry, mariculture, and tourism. Of the

[42] 2017 Census of Agriculture Marin County Profile,

343 agricultural operations in Marin County, the majority are third- to fifth-generation family-owned farms and are not large by California standards, with an average size of 408 acres.

Agricultural workers are significantly impacted by the high cost of living in Marin County, especially housing costs that are influenced by vacation rentals and high-end tourism. To promote a vibrant and economically sound agriculture base as part of Marin County's future, quality affordable housing for agricultural workers is needed. In almost all cases agricultural housing is tied to employment. If a worker is fired or leaves a job, becomes injured or an agricultural facility stops production, that housing is no longer available. This was identified as a concern during the public outreach for the Housing Element.

Almost all agriculturally zoned land in Marin County is located within unincorporated County areas, so presumably the data available on the agricultural worker population in the County is representative of the unincorporated County. The 2017 USDA Census reported that in Marin County, 1,274 persons were hired farmworkers, which accounts for less than 1% of the Marin County workforce. [43]

Distinct from other agricultural regions of the State, much of the County's agricultural production primarily requires a year-round, permanent workforce. As a result, the County does not experience a significant influx of seasonal workers during peak harvest times. Agricultural worker housing needs are dictated by the presence of parallel factors:

- The majority of agricultural worker housing units, both for permanent and seasonal workers, are provided on site by the employer-ranchers.
- As a largely permanent workforce, agricultural workers live in multi-person households, often with spouses and children.[44] Agricultural workers' spouses are often employed in non- agricultural jobs, such as visitor-serving businesses in West Marin.

These factors indicate that the housing needs of agricultural workers are best met through the provision of permanent single- and multi-family affordable housing. Given the existing housing on ranches, two important issues arise:

- Ensuring that the workforce and their families are being housed in safe and healthy conditions is a major priority
- Allowing agricultural worker households to determine the type and location of housing that is most suitable through enhancing housing choices and options
- Additional tenant rights to support agricultural workers

[43] Civilian employed population 16 years and over. American Community Survey Five-Year Estimates, 2015-2019. Table S2403.

[44] Evaluation of the Need for Ranch Worker Housing in Marin County, California, California Human Development Corporation, July 2008

Limited space, septic capacity, and high building costs often make it difficult to house migrant workers, presenting disincentives for employer-ranchers to provide more than basic shelter with minimal amenities. Common challenges faced by agricultural worker households include:

- Limited Income: With a mean annual salary of $41,321,[45] most agricultural workers fall within very low income groups (the 2021 HCD income limits are $38,400 and $63,950 for a one-person household for extremely low and very low income households).

- Cost Burden/Lack of Affordability: As described above, HUD considers payment of more than 30% of a household's income for direct housing expenses as overpayment or an undue hardship. According to the California Housing Partnership 2021 Affordable Housing Needs Report,[46] a Marin County household would have to earn a minimum of $48.46 an hour in full-time employment to afford the average asking rent[47] in Marin County. Opportunities for affordable rental housing or opportunities for homeownership are considerably constrained for the agricultural worker population.

- Overcrowding: Due to low incomes and lack of inventory, agricultural workers have limited housing choices and are often forced to double up to afford rents. Many such units are not monitored for code enforcement on past development and building approvals unless complaints are lodged.

- Substandard Housing Conditions: Many agricultural workers occupy substandard housing, such as informal shacks, illegal garages, barns or storage units, trailers, and other structures generally unsuitable for occupancy. The County's Code Enforcement staff investigates complaints against property owners for code violations but does not actively monitor agricultural worker housing units for code compliance. Few HUD Section 8 vouchers are utilized in West Marin due to the scarcity of affordable units and the inability of these units to pass the required HUD Housing Quality Standards inspection. During the Housing Element public outreach, it was identified that in many cases, existing septic systems cannot accommodate new units on sites in West Marin, including those that house agricultural employees and their families.

[45] Based on the mean annual wages for Farming, Fishing, and Forestry Occupations in the Marin County (San Rafael MD) as reported in the 2021 First Quarter Occupational Employment and Wage Statistics (OEWS) Survey.
[46] https://1p08d91kd0c03rlxhmhtydpr-wpengine.netdna-ssl.com/wp-content/uploads/2021/05/Marin_Housing_Report.pdf
[47] Average asking rent assumed was $2,520.

The need for the County to facilitate additional housing for agricultural workers was identified as a key priority during preparation of the Housing Element by focus groups, particularly in West Marin.

Currently, the County's provisions for agricultural worker housing is not consistent with State Employee Housing Act. Furthermore, the Development Code does not contain provisions for employee housing. Pursuant to the Employee Housing Act, any housing for six or fewer employees (in any industry) should be permitted as a single-family residential use. The Housing Plan section of the Housing Element contains programs to address these inconsistencies with state law and to help to facilitate more agricultural worker housing in the unincorporated County.

Individuals and Families Experiencing Homelessness

Individuals and families experiencing homelessness have immediate housing needs. Also, many residents lack stable housing but are not considered unhoused, according to the HUD definition[48]. They live doubled up in overcrowded dwellings, often sleeping in shifts or renting closet space or "couch surfing" with family or friends. Although not living on the street, this population often has no means of stable accommodation and may experience periods of being unsheltered. In addition, their living situation affects their ability to access services designated for people experiencing homelessness.

The Marin County 2019 Point in Time Count of people experiencing homelessness was conducted on January 28, 2019 and surveyed 360 unsheltered and sheltered individuals experiencing homelessness to profile their experience and characteristics. This is an on-the-ground survey that is undertaken by a team of County employees and volunteers to determine that number of persons experiencing homeless at a specific point in time (January 28, 2019). According to this survey, in January 2019, 1,034 persons in the County met the Marin County Health and Human Services definition of homeless, of which 172 (17%) resided in the unincorporated County (Table H-2.45). This represented a 7% decrease from the 2017 countywide population, but a 26% increase in the unincorporated County homeless count. All homeless persons surveyed in the unincorporated County in 2019 were considered unsheltered, while countywide, about 68% are unsheltered. Regionally, North Marin and Central Marin had the highest population of people experiencing homelessness, while in the unincorporated County, West Marin had the highest population of people experiencing homelessness.

In 2019, the number of those experiencing unsheltered homelessness continued to decrease in all regions of the County except for West Marin and South Marin. West Marin saw a population increase of 41 people since 2017, which may be in part due to increased outreach efforts and specialized teams familiar with the communities

[48] (1) Individual or family who lacks a fixed, regular, and adequate nighttime residence, (2) Individual or family who will imminently lose their primary nighttime residence within 14 days.

conducting the count in this region. With the planned closure of a rotating shelter in 2017, the sheltered number decreased by 20% from 2017 to 326 persons in 2019. Although the sheltered number decreased, the unsheltered number did not increase. Information about the 2021 count of persons experiencing homelessness is included later in this section, in Effects of Covid-19.

Table H-2.45: Total Homeless Count Population, By Jurisdiction and Shelter Status

Jurisdiction	Unsheltered	Sheltered	Total
North Marin	147	163	310
Novato	147	163	310
Central Marin	277	94	371
San Anselmo	20	0	20
San Rafael	161	94	255
Corte Madera	39	0	39
Fairfax	5	0	5
Larkspur	28	0	28
Mill Valley	8	0	8
Unincorporated Central Marin	16	0	16
South Marin	144	0	144
Sausalito	25	0	25
Richardson Bay Anchor Outs	103	0	103
Belvedere	0	0	0
Unincorporated South Marin	16	0	16
West Marin	140	0	140
Unincorporated West Marin	140	0	140
Other	0	69	69
Domestic Violence Shelter	0	69	69
Rotating Shelter	0	0	0
Unincorporated Total	*172*	*0*	*172*
County Total*	708	326	1,034

Table H-2.45: Total Homeless Count Population, By Jurisdiction and Shelter Status

Jurisdiction	Unsheltered	Sheltered	Total

Source: 2019 Marin County Homeless County and Survey Comprehensive Report

*Note: Please refer to Table H-2.1: and Figure H-2.1 for the census designated places included in the unincorporated communities. * Total is the sum of North Marin, Central Marin, South Marin and West Marin and "Other."*

Characteristics of the Population Experiencing Homelessness

The Needs Assessment in the County's 2020-2024 Consolidated Plan estimated that 543 persons were becoming homeless each year (System Performance Measure 5.2), while 199 persons exited homelessness each year (System Performance Measure 7b.1). In addition, the Consolidated Plan estimated that people experience homelessness for over two years (764 days; System Performance Measure 1.2).

During the 2019 Point in Time Count, 54 households with children aged 18 or under were counted, including 61 adults and 81 kids (147 individuals). This is lower than the 75 households with children counted in 2017. Most families reported the following reasons for homelessness: lack of affordable housing, no income/loss of job, alcohol/drug issues, or end of a relationship. About 90% of Marin County families experiencing homelessness reside in shelters or transitional housing programs (66 households).

The 2019 Point in Time count report showed 38% (360) of all homeless adults counted having at least one type of disabling condition, such as a physical or developmental disability, chronic illness, or a substance use disorder. About 62% of these individuals with disabling conditions are unsheltered, while 38% live in emergency or transitional housing. Health issues and mental health issues are not atypical to the population experiencing homelessness. Homelessness is a traumatic event which can cause both physical and psychological difficulties.

Overall, the 2019 Marin County Homeless Count and Survey revealed a diverse homeless population with many different trends and needs. The data presents valuable insights into the population experiencing homelessness in Marin County for both the general population and subpopulations:

- About 31% of those experiencing homelessness were over the age of 50, and 19% were under age 25.

- Those who are Black or African American were overrepresented in the population: 2% of the general population but 17% of the homeless population identified as Black or African American.
- First-time homelessness decreased from 35% in 2017 to 30% in 2019.
- 70% of survey respondents had experienced homelessness for one year or more.
- Economic issues were the most frequently cited cause of homelessness (49%).
- 73% cited a need for rental assistance to get into permanent housing.
- Veterans: More veterans were being sheltered in 2019, 19% were sheltered up from 13% in 2017 and veterans were more likely to report a physical disability (45% of veteran respondents compared 22% of non-veteran respondents).
- Families with Children: The number of families experiencing homelessness decreased 28% from 2017. This may have changed since the Covid-19 pandemic.
- Unaccompanied Children and Transition-Age Youth: There were eight unaccompanied children and 99 unaccompanied transition-age youth (age 18-24) enumerated, accounting for 10% of the population experiencing homelessness in Marin County. Youth respondents were less likely to receive free meals (17%) than those over age 25.
- Older Adults: Older adults comprised 31% of the population experiencing homelessness and over two thirds were unsheltered.

Effects of COVID-19

Due to the COVID-19 pandemic, the County delayed the 2021 on-the-ground count until 2022. The decision was made with a heavy consideration for public safety, for both the unhoused in Marin County and the teams that count them. However, in the continuing effort to monitor homelessness and progress towards its elimination, the Marin County Continuum of Care decided that it would be safe to conduct a vehicle count versus the in person, on the ground count typically done, to partially help understand the current state of homelessness locally. On February 25, 2021, a special team of 41 people comprising local law enforcement, homeless outreach staff, and persons with lived vehicle experience canvassed Marin County to help determine the current prevalence of people living in vehicles. The count found 486 people living in 381 vehicles, a 91% increase over 2019.[49] Between 2019 and 2021, the number of people living in vehicles decreased in West Marin, while increasing in North, Central and Sothern Marin.

Because people experiencing homelessness are not evenly distributed between living situations and living in a vehicle is often the first place people go when they become homeless, the 91% increase in people living in vehicles does not equal a 91% increase

[49] Marin Health and Human Services, 2021 Marin Homelessness Vehicle Count, February 25, 2021.

in homelessness overall. However, it does indicate some level of new homelessness in Marin.

Unmet Needs

According to the data collected during the 2019 Point in Time count and the needs assessment conducted to inform the Marin County 2020-2024 Consolidated Plan, the populations most in need of housing include individuals with mental and physical disabilities, families, individuals in the work force, and older adults in the very low and low income range. Those currently housed but at imminent risk of homelessness include those with disabilities, households with children below the federal poverty level, older adults, and farmworkers.

The needs of the homeless population and an outline of ways to address them are contained in the report A Response to Homelessness in Marin County: Assessing the Need & Taking Action (2019). Ultimately, the report identified the following priorities and goals through a series of stakeholder discussions:

- End Chronic and Veteran Homelessness in Marin County by 2022
- Create Additional Permanent Housing Opportunities to Address Needs of the Most Vulnerable
- Maintain and Enhance Fidelity to the Principles of Housing First
  Improve and Expand Data Sharing Capacity to Provide Comprehensive, Coordinated Care to Persons Experiencing Homelessness

To estimate the unmet need for shelter beds and to document the existing resources for homeless families and individuals, the County used information from the 2021 Homeless Housing, Assistance, and Prevention (HHAP) Grant Program funding application submitted to the State of California's Business, Consumer Services, and Housing Agency. Table H-2.46 identifies which areas of the local homelessness response system (e.g., shelter, rental subsidies, supportive housing) have gaps in resources based on the needs of people experiencing homelessness in the County. During the public outreach for the Housing Element, establishing a coordinated entry system for individuals experiencing homeless, particularly in West Marin, was identified as a need. Focus group participants stated that people in West Marin are living in camper vans and isolated from services.

Table H-2.46: Service Gap Analysis

	Total # of Clients Currently Needing This Service	Total # of Clients Currently Receiving This Service	Remaining Needs
Interim Housing/Shelter Beds	1,034	326	708
Rental Assistance	756	235	521
Supportive Housing (Permanent)	1,076	525	551
Outreach	708	300	408
Prevention/Diversion	2,690	520	2,170

Source: Marin County CoC Homeless Housing, Assistance and Prevention (HHAP) Grant Program Application submitted to Business, Consumer Services, and Housing Agency (BCSH).

Table H-2.47 below provides a summary of the emergency shelter beds and transitional and supportive housing units for homeless people that are located throughout Marin County. The Fireside Affordable Apartments, which provide 18 units of supportive housing (10 for families and 8 for formerly homeless seniors), are located within unincorporated Marin County. Additional transitional or supportive units provided at scattered sites and located within the unincorporated County are unknown at this time.

Table H-2.47: Facilities and Housing Targeted to Homeless Households

	Emergency Shelter Beds		Transitional Housing Beds	Permanent Supportive Housing Beds		
	Year-Round Beds (Current & New)	Voucher / Seasonal / Overflow Beds	Current & New	Current & New	Under Development	Total
Households with Adult(s) and Child(ren)	55	3	159	155	0	372
Households with Only Adults	149	60	38	492	10	749
Chronically Homeless Households	0	0	0	492	28	520
Veterans	0	0	0	16	0	16
Unaccompanied Youth	0	0	0	0	0	0
Total	204	63	197	1,155	38	1,657

Source: Marin County 2020-2024 Consolidated Plan

Assessment of Unmet Year-Round Need for Emergency Shelter

Marin County estimates that 708 year-round interim housing/emergency shelter beds are needed to meet the needs of the 1,034 unsheltered homeless people in the County. Given the increase in homelessness assumed from the 2021 vehicle county surveys, it is likely that this need is higher due to the COVID-19 pandemic.

Assessment of Unmet Need for Supportive Housing

In Marin County's 2021 HHAP Grant Program Application, the County's Continuum of Care estimates that the County has an unmet need for 551 beds across jurisdictions in permanent housing. There is no breakdown of this unmet need estimate by jurisdiction. However, Marin County has estimated the needed beds based on the percentage of the total number of unsheltered homeless people living in the community. Given that 24% of the total unsheltered homeless people in the County are estimated to reside in unincorporated areas of Marin, the estimated unmet need for supportive housing beds is

133. The program chapter of the Housing Element contains a program to pursue funding for providing permanent supportive housing for the homeless (Project Homekey).

Extremely Low Income Households

Extremely low-income households earn up to 30% of the Area Median Income. This group is considered a special needs groups because of the limited housing options available to them. Extremely low-income households also tend to include a higher proportion of seniors or disabled persons. In unincorporated Marin County, 3,623 households were considered extremely low-income according to the 2013-2017 Comprehensive Housing Affordability Strategy (CHAS) data by HUD, which represents about 14% of the overall households (Table H-2.22). This is similar to the share of ELI households in Marin County overall (14.9%). Approximately 61% of the extremely low income households were renters. Furthermore, 73% of the extremely low-income households were experiencing at least one housing problem (overcrowding, cost burden, or inadequate housing) (Table H-2.48). Specifically, 68% of the extremely low-income renters and 81% of the extremely low-income owners were experiencing at least one housing problem. Cost burdens are also high for extremely low income households. About 70% of all ELI households are cost burdened. About 62% of ELI renters experience cost burdens compared 81% of ELI owner households.

Among the unincorporated county communities, West Marin communities have the highest concentration of ELI households (Table H-2.23). Marin City has the highest proportion of ELI households 40%), followed by Central Coastal West Marin (30%), Northern Coastal West Marin (23%), and Southern Coastal West Marin (18 percent).

Table H-2.48: Housing Problems and Cost Burden for ELI HH by Tenure- Unincorporated County

	Owners		Renters		All Unincorp. HH	
	#	%	#	%	#	%
ELI	1,128	--	1,768	--	2,896	--
with at least one H problem	918	81.4%	1,203	68.0%	2,121	73.2%
with cost burden	912	80.9%	1,104	62.4%	2,017	69.6%

Source: 2013-2017 HUD CHAS
Data is the sum of the CDPs in Table H-2.1.

The City supports the housing needs of ELI households and lower income households with HUD Community Planning and Development Grants and SB2 Permanent Local Housing Allocation (PLHA). The CDBG can fund a variety of activities such as acquisition and/or disposition of real estate or property, public services, relocation, rehabilitation of housing, and homeownership assistance. HOME funds can be used for activities that provide affordable housing opportunities for low to moderate income households, such as development of new affordable units, owner-occupied housing rehabilitation, homebuyer assistance, and tenant-based rental assistance. The County uses HOME funds to gap-finance affordable housing projects throughout the County. The County anticipates receiving between $750,000 to $1,500,000 in PLHA annually that can be used to increase the supply of housing for households at or below 60% of AMI (which includes ELI households) and facilitate housing affordability, particularly for lower and moderate income households.

In addition, the City's Housing Plan includes a program to explore strategies that strengthen tenant protections such as rent stabilization, just cause for eviction, and local relocation assistance (Program 31- Tenant Protection Strategies). Tenant protection strategies benefit the most vulnerable segments of the community such as ELI households. There is also a variety of programs to increase affordable housing supply throughout the County, prioritizing funding to projects that include ELI households.

Units at Risk of Conversion

As of 2022, 24 affordable housing projects totaling 1,148 units (including 877 affordable units) are in unincorporated Marin (Table H-2.49**).** Government Code Section 65583 requires each city and county to conduct an analysis and identify programs for preserving assisted housing developments. The analysis is required to identify any low income units that are at risk of losing deed-restricted subsidies in the next 10 years. Two projects (Ponderosa Estates and Parnow House) with 128 affordable units are deemed at risk of conversion during the 2023-2033 at-risk analysis period.

Table H-2.49: Publicly Assisted Multi-Family Affordable Rental Housing

Name	Address	# of Units	# of Afford Units	Utility Type	Non Profit	Expiration Date
Ponderosa Estates	1001 Drake Ave.	56	56		John Stewart	2023
Parnow Friendship House	164 N. San Pedro Rd.	72	72		EAH Housing	2024
The Redwoods II		60	60		Community Church of Mill Valley	2036
Mill Creek Apartments		9	9	Persons with disabilities	North Bay Rehab Services	2039
Village Oduduwa Complex	2 Park Circle	25	25	Seniors	Oakland Community Housing Manageme nt	2040
Hilarita	100 Neds Way	91	91		EAH	2045
Dorothea Mitchell Apartments	52 Terrace Dr.	30	30		Bridge	2051
Rotary Valley Senior Village	10 Jeannette Prandi Way #2601	80	80	Seniors	Bridge	2051
Bo Gas	6 Wharf Rd.	8	8		BCLT	2059
Gibson House	20 Wharf Road	7	7		BCLT	2059
Point Reyes Family Homes	12 Giacomini Rd.	27	27		EAH	2060
Mesa Apartments		4	4		CLAM	2061

Table H-2.49: Publicly Assisted Multi-Family Affordable Rental Housing

Name	Address	# of Units	# of Afford Units	Utility Type	Non Profit	Expiration Date
Ridgeway Apartments	141 Donohue St.	225	72		St. Anton Multifamily	2064
Fireside Apartments	115 Shoreline Hwy.	50	50	Families and Seniors	Eden	2065
Toussin Apartments	10 Toussin Avenue	13	13	Seniors	PEP	2065
Anise Turina Apartments	10 La Brea Way	287	287		EAH	2067
Forest Knolls Trailer Court	6690 Sir Francis Drake Blvd.	20	20	Mobile Homes	SGVAHA	2070
21 Calle Del Embarcadero (Ocean Terrace Apartments)	21 Calle del Embarcadero	8	8		CLAM	2071
Walnut Place West Marin	600 A. St.	25	25	Seniors/Disabled	EAH	2073
Sage Lane Senior		6	6		SGVAHA	Forever
Homestead Terrace	100 Linden Lane	28	28	Seniors/Disabled	MHA	
Kruger Pines	47 North Knoll Rd.	56	56	Seniors/Disabled	MHA	
Mt. Burdell		10	10		Habitat for Humanity	
Venetia Oaks	263 North San Pedro Road	36	36	Seniors/Disabled	MHA	
Total		1,148	877			

According to the 2020-2024 Consolidated Plan, Marin Housing Authority manages 340 Below Market Rate (BMR) homeownership units throughout Marin County that are preserved by deed-restriction, of which 90 units are in the unincorporated County. The Marin Housing Authority processes all sales of new units, resales of existing units, refinances, capital improvement evaluations, down payment assistance, and monitoring of the portfolio for compliance with BMR Program requirements. MHA also works with developers at the initial stage to formulate Developer Agreements determining the affordability range and construction requirements for these BMR units. There are an additional 408 BMR units in the City of Novato that are managed by Hello Housing in a similar manner. As of 2020, MHA does not have any anticipated Section 8 contract expirations.

Conversion Risk

The units considered at-risk of conversion in the unincorporated County are all at risk based on the expiration of restrictions for low income use through various financing sources. However, while the units described in Table H-2.49 may meet the definition of at risk of conversion as described in Government Code Section 65583, the risk of conversion is low because they are all owned by non-profits with a mission of providing long term affordable housing. The existing owners all intend to maintain the affordability of the units. There are limited costs associated with rehabilitation as based on regular monitoring and inspections, all of the complexes are in good condition.

Preservation Resources

In order to retain affordable housing, the County must be able to draw upon two basic types of preservation resources: organizational and financial. Qualified, non-profit entities will be notified of any future possibilities of units becoming at risk. A list of qualified entitles to acquire and manage at-risk units is available through HCD's website and will be relied upon to provide notification of units at risk. However, the majority of these properties are already owned by nonprofit organizations and therefore preservation by transferring ownership to other nonprofits is not necessarily an efficient strategy.

Funding is available to facilitate preservation through the County's Affordable Housing Trust Fund, Permanent Local Housing Allocation (PLHA), HOME and CDBG funds. Preservation is one of the County's priorities for use of these funds.

Costs of Replacement versus Preservation for Units At-Risk During the Planning Period

According to the California Housing Partnership Corporation website, one development is deemed at risk of conversion during the planning period, 56-unit Ponderosa Estates in

Marin City which has 56 units funded through HUD's Section 8 program. However, additional research found that Ponderosa Estates renewed their agreement with HUD in 2004 for an additional 40 years and the current restrictions do not expire until 2044. The property is part of HUD's Property Disposition Program which provides financial assistance for HUD owned housing projects to maintain their affordability. Assistance is provided to existing projects in need of repair as well as projects already in decent, safe, and sanitary conditions. By providing funding for these projects, HUD helps preserve decent, safe, housing affordable for low income families and minimizes displacement.

A second project – 72-unit Parnow Friendship House – is also identified with a potential conversion date of 2024. However, this project is owned and operated by EAH Housing, a nonprofit organization committed to providing permanent affordable housing to low income households. The expiration of deed restriction does not present a risk of conversion.

The high cost of land and construction make affordable housing development in Marin difficult without substantial subsidy. Projects tend to be small in scale due to local zoning which favors lower density development and community opposition to larger housing projects. Small projects are not competitive for many State funding sources and are not able to benefit from economies of scale. This results in higher development costs per unit, and it also results in higher ongoing management costs per rental unit. An example of high development costs is a project currently developing 54 one-bedroom units of affordable housing in Marin with a per unit cost of over $650,000.[50] Therefore, the cost to construct 128 new units is estimated at $83.2 million.

Based on the limited supply of developable land, high cost of construction and lengthy approval process, rehabilitation of existing units instead of new construction is the most economical way of providing housing. The cost of preservation is significantly less. For example, in 2015 the eight-unit Calle del Embarcadero Apartments in Stinson Beach was going to be sold and existing residents, including two tenants using Section 8 housing assistance vouchers, were likely to be displaced because the new owner was expected to raise rents to market rates. A collaboration between the County of Marin, Marin Community Foundation, Community Land Trust Association of West Marin (CLAM) and the Stinson Beach Affordable Housing Committee was formed to enable the creation of the first permanently affordable housing units in Stinson Beach. According to the Marin Community Foundation, mix of grants and loans totaling $2.85 million was supplied to cover the cost of purchasing the Calle del Embarcadero Apartments by CLAM.[51] Based on the information supplied by the Marin Community Foundation, the per unit cost for the acquisition of the apartments was $356,250 per

[50] 2020-2024 Consolidated Plan.
[51] https://www.marincf.org/buck-family-fund-grants/mcf-loan-fund/case-studies-stinson-beach-affordable-housing

unit, about half of the costs for new construction. Therefore, the cost of preserve 128 units of high and very high risk units can be estimated at about $45.6 million.

Disadvantaged Communities

SB 244, codified in Government Code Section 56375, requires cities and counties to identify the infrastructure and service needs of unincorporated legacy communities in their general plans at the time of the next Housing Element update. SB 244 defines an unincorporated legacy community as a place that meets the following criteria:

- Contains 10 or more dwelling units in close proximity to one another;
- Is either within a city Sphere of Influence (SOI), is an island within a city; boundary, or is geographically isolated and has existed for more than 50 years; and
- Has a median household income that is 80% or less than the statewide median household income.

Per this definition, no disadvantaged communities are located within the unincorporated area of the County. The Marin Local Agency Formation Commission's Municipal Services Review (MSR) from October 2019 identified one disadvantaged community in several census tracts covering the Canal neighborhood of San Rafael Region that met the disadvantaged community criteria.[52] However, given this neighborhood is entirely within the San Rafael city limits, it does not qualify as a disadvantaged community in the unincorporated County. The October 2020 reports for the Twin Cities Region, Novato Region, Upper Ross Valley, and Tiburon Peninsula did not identify any disadvantaged communities.

While the community of Marin City does not fall under the definition of SB 244, it still faces many of the same challenges. As discussed in the AFFH appendix, Marin City is defined as a "sensitive community" by the UC Berkeley Urban Displacement project. This means that the share of renters is above 40%, share of people of color is more than 50% as well as a higher share of low income households and severely rent burdened households and proximity to displacement pressures. Displacement pressures were defined based on median rent increases and rent gaps. The Housing Element focus group members were concerned about displacement for residents who cannot find affordable housing.

[52] https://www.marinlafco.org/files/8fd4604a2/San+Rafael+Reg+MSR_Final+Post+Adoption+Oct.2019%5B2%5D.pdf

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CHAPTER 3: HOUSING CONSTRAINTS

Nongovernmental Constraints

Many factors contribute to the cost of housing, including land and construction costs, financing, community resistance to new development, and available infrastructure capacity. These factors impact the availability of housing, especially affordable housing, in Marin County.

Land and Construction Costs

Nearly 84% of Marin County consists of lands used for open space, watersheds, tidelands, parks, and agriculture. Only 11% of the land area has been developed, and most of the remaining available land is in incorporated cities and towns.[1] The limited amount of land available for development, combined with the County's location in the Bay Area, makes land costs high. Land appraisals indicate how land costs impact overall development costs in Marin County. Land value varies significantly depending on location and development potential. Two key examples are as follows.

1. In November 2020, a 1.23-acre site in San Geronimo was determined to have a market value of $1,920,000. The land area value was $352 per square foot, and the unit valuation was $210,000 per unit.
2. In September 2021, a site in Tomales was valued at $800,000. The land area valuation was $32 per square foot and the unit valuation was $55,000 per unit (13 total units assumed on the property).

Construction costs include materials and labor. In general, land costs per unit can be lowered by increasing the number of units built. According to the Association of Bay Area Governments (ABAG), wood frame construction at 20 to 30 units per acre is generally the most cost-efficient method of residential development. However, local circumstances affecting land costs and market demand will impact the economic feasibility of construction types. The North Bay Fires and the COVID-19 pandemic also disrupted the supply chain and impacted the costs of construction materials.

One indicator of construction costs is Building Valuation Data, compiled by the International Code Council (ICC). The unit costs compiled by the ICC include structural, electrical, plumbing, and mechanical work, in addition to interior finish and normal site preparation. The data are national and do not account for regional differences nor

[1] Marin Countywide Plan. Prepared by the Marin County Community Development Agency. Adopted November 6, 2007.

include the price of the land upon which the building is built. The most recent Building Valuation Data, dated February 2021, reports the national average for development costs per square foot for apartments and single-family homes as follows:[2]

- Type I or II, R-2 Residential Multi-family: $157.74 to $179.04 per square foot
- Type V Wood Frame, R-2 Residential Multi-family: $120.47 to $125.18 per square foot
- Type V Wood Frame, R-3 Residential One- and Two-Family Dwelling: $130.58 to $138.79 per square foot
- R-4 Residential Care/Assisted Living Facilities generally range between $152.25 to $211.58 per square foot

Additionally, labor costs are influenced by the availability of workers and prevailing wages. State law requires payment of prevailing wages for many private projects constructed under an agreement with a public agency that provides assistance. As a result, the prevailing wage requirement substantially increases the cost of affordable housing construction. In addition, a statewide shortage of construction workers can impact the availability and cost of labor to complete housing projects. This shortage may be further exacerbated by limitations and restrictions due to the COVID-19 pandemic. In Marin County, many contractors who cannot afford to live here are not based in the county and travel from outside the area, potentially adding to labor shortages. Although construction costs are a significant factor in the overall cost of development, County of Marin staff has no direct influence over materials and labor costs.

A report in 2020 by the Terner Center for Housing Innovation at UC Berkeley found that materials and labor (also referred to as hard construction costs) accounted for approximately 63% of total development costs for multi-family projects in California between 2010 and 2019.3 The report also found that controlling for project characteristics, compared to the rest of the state, average materials and labor costs were $81 more expensive per square foot in the Bay Area. The Bay Area has comparatively higher construction wages than elsewhere in California.[4]

In April 2022, the County's Affordable Housing Financial Assessment Study was published. This study looked at the costs of affordable housing production in Marin County, including funding gaps. As part of the analysis, several projects in Marin, Sonoma and Napa Counties were examined for development costs[5]. The following is a summary of the seven projects:

[2] https://cdn-web.iccsafe.org/wp-content/uploads/BVD-BSJ-FEB21.pdf

3 The Hard Costs of Construction: Recent Trends in Labor and Materials Costs for Apartment Buildings in California, Terner Center for Housing Innovation. March 2020.

4 Same as footnote 3.

[5] Economic & Planning Systems, Inc. Affordable Housing Financial Assessment Study: Marin County Housing Element Technical Support Document. April 5, 2022.

- Average number of units in the project: 85
- Average dwelling units per acre: 63.27
- Average land costs: $3,174,814; $37/square foot
- Average construction costs: $28,383,713; $345/square foot
- Average project costs: $47,179,443; $564/square foot

Identified Densities and Delays in Requesting Building Permits

Requests to develop housing at densities below those anticipated in the Housing Element may be a non-governmental constraint to housing development, when the private sector prefers to develop at lower densities than shown in the housing element. None of the current sites in the 2015-2022 Housing Element have developed. As noted in the June 2021 Memo from Strategic Economics and Vernazza Wolfe Associates to update the County's Inclusionary policies, residential developers participating in this study cited many factors contributing to the complexity of housing development in Marin, including long and unpredictable approval processes, opposition from some community members, lack of available sites, especially those that are zoned for multi-family housing, high land and construction costs, and inadequate or expensive infrastructure. These barriers are addressed in the current Housing Element in a variety of ways, such as Program 1: Adequate Sites for RHNA and Monitoring of No Net Loss and Program 6: Efficient Use of Multi-Unit Land.

As noted above, CWP policies identified as barriers are being deleted and or amended. Specifically, the County, concurrently with adoption of the Housing Element, will:

- Revise the Housing Overlay District as a form-based code to streamline multi-family housing development.
- Provide for ministerial review of projects that meet the requirements of the form-based code and include 20% lower income units.
- Provide for by-right zoning on sites identified in past Housing Elements that are designated for lower income housing.
- Amend the Countywide Plan and Zoning Code to increase densities on opportunity sites identified in the Housing Element and for low income sites have a minimum of 20 units per acre.

In addition, sites are being rezoned to increase densities to 20 to 30 units per acre, and objective design standards will be adopted to facilitate review. The EIR prepared for the housing element evaluated a possible increase in the designated site capacity by 35% to accommodate future density bonuses and ease project environmental review. Together, these changes will address the barriers identified above.

Financing Availability

The availability of financing affects a person's ability to purchase or improve a home. Under the federal Home Mortgage Disclosure Act (HMDA), lending institutions are required to disclose information on the disposition of loan applications. Through analysis of HMDA data, an assessment can be made of the availability of residential financing within Marin County.

Table H-3.1 illustrates the home purchase and improvement loan activity in Marin County in 2020. Data for just the unincorporated areas are not readily available. Of the 23,703 total applications processed in 2020, a majority (80%) were for refinance loans. Overall, the approval rating for all types of loans was 69%, while the denial rate was 10%; 21% were either withdrawn by the applicant or closed for incompleteness. The highest approval ratings were for home purchase loans at 78% for conventional loans and 76% for government-backed loans. Refinance loan approvals were next with a 68% approval rating, while home improvement loans had the lowest approval rating at 56%.

Table H-3.1: Disposition of Home Purchase and Improvement Loan Applications in Marin County (2020)

Loan Type	Total Applications	Approved	Denied	Other
Government-Backed Purchase	93	76.3%	3.2%	20.4%
Conventional Purchase	3,465	78.4%	5.6%	16.0%
Refinance	19,072	68.1%	9.4%	22.5%
Home Improvement	1,073	56.4%	29.6%	14.0%
Total	23,703	69.1%	9.8%	21.1%

Source: 2020 Home Mortgage Disclosure Data. https://ffiec.cfpb.gov/data-publication/aggregate-reports

Note: "Approved" loans include loans originated and applications approved but not accepted. "Other" includes loans withdrawn by the applicant or closed for incompleteness.

Community Resistance to New Development

A significant constraint to housing production in Marin County is community resistance to new housing developments at all income levels. Marin County's infrastructure has been strained, and this creates a number of concerns voiced by County residents, such as: 1) new developments may cause increased traffic; 2) long-term sustainability of the local water supply limits new housing production; 3) potential impacts on schools and other local infrastructure; and 4) open space could be lost. Additionally, issues related to

how affordable housing may impact property values, or how affordable housing should be distributed more evenly throughout the County are raised. Additionally, "community character" is often raised, such as how density may adversely affect the visual cohesiveness of the neighborhood or whether multifamily would fit in with existing uses. This is an unquantifiable term that is often found in County findings to approve or deny a Design Review, Master Plan or other development applications. Subjective terms like "neighborhood character" or "community character" can deny critical housing projects with no measurable reasoning. At times, there is tension between fair housing laws and a desire to provide preferential access to affordable housing for local community members and workers. In many cases, it is not possible to target housing to select groups. These concerns are often expressed during project review processes and can present significant political barriers to development.

The County of Marin seeks to address community opposition in a number of ways, including:

- Housing staff will continue to provide presentations and fact sheets about affordable housing. Concerns to be addressed include studies on property values and affordable housing, information on who lives in affordable housing, and traffic data on affordable developments, such as fewer vehicles owned, and fewer vehicle miles traveled by lower income households.
- This Housing Element includes programs for housing staff to continue to coordinate with local nonprofit developers on how to effectively work with community groups, County staff, and elected officials.
- This Housing Element includes programs intended to encourage and facilitate preliminary community planning of major developments to identify and address opposition at an early stage.

Infrastructure

Public infrastructure is generally sufficient to meet projected growth demands. Electric, gas, and telephone services have capacity to meet additional projected need. Transportation, water, and sewer infrastructure are discussed in greater detail below.

Transportation

The County has two main thoroughfares. Highway 101 transverses the County south to north, extending from the Golden Gate Bridge through the City-Centered Corridor to the Sonoma County border at the north end of Novato. Sir Francis Drake Boulevard is the primary east-to-west thoroughfare, extending from Interstate 580 in the east, crossing under Highway 101 and connecting to Highway 1 in the community of Olema. Highway

1 also connects south Marin to the coastal communities. As is the case throughout the Bay Area, the County is impacted by severe traffic conditions.

Marin County is served by a network of bus service, including Golden Gate Transit, which provides inter-county regional bus service, and Marin Transit Authority (MTA), which operates local service and shuttles. Marin County is also linked to San Francisco via ferry service from Larkspur, Sausalito, and Tiburon. As described in Appendix D of this element, there is a need to connect West Marin to the transportation hubs in North, Central, and South Marin. For this reason, MTA operates the West Marin Stagecoach which consists of two regularly operating bus routes between central and West Marin. Route 61 goes to Marin City, Mill Valley, and Stinson Beach. Route 68 goes to San Rafael, San Anselmo, Point Reyes and Inverness. The Stagecoach also connects with Marin Transit and Golden Gate Transit bus routes. However, the Northern Coastal West Marin area does not have any public transit connection to the south. Bus transit only connects as far north as Inverness. This lack of transit connection affects the minority populations and the persons with disabilities concentrated in the west part of the County. Residents in some communities, such as Santa Venetia and Kentfield, have noted that bus service is not adequate.

In addition to its fixed routes, MTA offers several other transportation options, some of which are available for specific populations:

- Novato Dial-A-Ride - designed to fill gaps in Novato's local transit service and connects service with Marin Transit and Golden Gate Transit bus routes
- West Marin Stage – provides public bus service from West Marin to Highway 101 corridor, which connects with Marin Transit and Golden Gate Transit bus routes
- ADA Paratransit Service – provides transportation for people unable to ride regular bus and trains due to a disability. It serves and operates in the same areas, same days, and same hours as public transit.
- Discount Taxi Program – called Marin-Catch-A-Ride, it offers discount rides by taxi and other licensed vehicles for people at least 80 years old, are 60 and unable to drive, or are eligible for ADA paratransit service.[6]

The Sonoma Marin Area Rail Transit (SMART) system started passenger service in August 2017. The current 45-mile corridor runs parallel to Highway 101. In Marin County, stations are located in Novato, San Rafael, and Larkspur. While no stations are located in unincorporated County areas, the commuter train system is expected to affect the County's interwoven urban corridor areas. Other transit connections, including bus service, are located adjacent to SMART stations.

[6] County of Marin Analysis of Impediments to Fair Housing Choice. Prepared by the Marin County Community Development Agency. January 2020.

The Marin County Community Development Agency (CDA) works closely with the Transportation Authority of Marin (TAM) and the ABAG to produce informative local data. Representatives from those agencies attend regular area planning directors' meetings.

The Countywide Plan and Inventory of Sites aims to address these conditions by facilitating development of higher density housing in areas which promote the minimization of vehicle miles traveled. These areas are typically in more urbanized locations with wider streets, close to city arterials and greater access to public transit systems. In addition to minimizing vehicle miles traveled, accommodating higher density housing in the more urban areas helps keep development in areas where emergency access and evacuation routes have greater capacity and Wildland Urban Interface (WUI) requirements for egress are more easily achieved. Lower density housing is promoted in the hillside and remote communities where emergency access is more limited and constrained.

Water

Marin County's water supplies include surface water, groundwater, recycled water, and imported water. Surface water is the main source of urban areas in the eastern portion of the County while groundwater and surface water are the primary sources for rural areas. There are approximately six water districts supplying water to Marin residents. The Marin Municipal Water District (MMWD) and the North Marin Water District (NMWD) are the principal entities managing and delivering water to residential and commercial consumers. The Marin Municipal Water District serves the largest customer base in Marin, providing water to the eastern corridor of Marin County from the Golden Gate Bridge northward up to, but not including, Novato, and encompasses an area covering 147 square miles. The NMWD serves the City of Novato and the Point Reyes and Olema areas of West Marin. Imported water is from the Sonoma County Water Agency (SCWA) which serves over 600,000 residents in Sonoma and Marin counties.

Water delivery in West Marin encompasses a range of scales, from the large water districts to small community water districts and smaller, individual systems. The small community water districts include Bolinas Community Public Utility District (BCPUD), Stinson Beach County Water District (SBCWD), Inverness Public Utility District (IPUD), and Muir Beach Community Services District (MBCSD). The community of Dillon Beach is served by two small independent water companies: the California Water Service Company (CWSC, Cal Water) and the Estero Mutual Water System (EMWS). SBCWD, MBCSD, and the Dillon Beach area primarily use groundwater for their water supplies, while IPUD and BCPUD rely mainly on surface water.

Marin County, along with the rest of the state has continued to face drought conditions over recent years; the water year that ended September 30, 2021 was the second driest

on record, due to extreme heat and lack of rain and snow. As of the end of 2021, all 58 counties in California were under a drought emergency proclamation. Marin water agencies monitor local water storage levels, encourage conservation practices and apply various drought restrictions, water use limits and associated penalties as needed.

Analysis:

The Marin Countywide Plan, adopted in 2007 and most recently updated in 2022, supports a land use pattern intended to keep the majority of future dwelling units from environmentally sensitive lands, which are often on septic and/or use well water, to locations within the City-Centered Corridor and rural communities where public water and sewer systems are provided.

Accordingly, the Sites Inventory consists of properties mostly located in the City-Centered Corridor, where services are available, and it is most feasible to meet the County's current default density of 20 units per acre for sites suitable for lower income housing. This is likely to result in less water use per unit but some increase in overall water usage in the MMWD service area (see below). Housing may be developed in West Marin at lower densities as appropriate and may need to utilize wells and septic systems.

Table H-3.2: Water Capacity for New Development

Water Service Area	Communities Served	Existing Units	Sites Inventory Units	Development Potential	Countywide Plan Buildout	Supply Deficits for Inventory	Notes / Description of Limitation	Inventory Sites
MMWD	All cities and towns along the City-Centered Corridor from the Golden Gate Bridge to the southern border of Novato	20,422	2,712	2,859	23,281 28,564	No	MMWD is allowing new connections for development. However, MMWD water supplies have been affected by recent drought. A moratorium on new landscaping installations for new service lines had been in effect due to a Water Shortage Emergency declared in 2021, but was rescinded in May 2022.	1 St. Vincent's Dr. 251 N San Pedro Rd 935 Sir Francis Drake 018-152-12 (E Sir Francis Drake) 155 Marinwood Ave 190 A Donahue St 2 Jeannette Prandi Way 7 Mt Lassen Dr 139 Kent Ave 200 N San Pedro Rd 1565 Vendola Dr 1500 Butterfield Rd

Table H-3.2: Water Capacity for New Development

Water Service Area	Communities Served	Existing Units	Sites Inventory Units	Development Potential	Countywide Plan Buildout	Supply Deficits for Inventory	Notes / Description of Limitation	Inventory Sites
								329 Auburn St 200 Phillips Dr 300 Storer Dr 825 Drake Ave Forest Knolls Site Saint Cecelia Church Woodacre Fire Station MLK Academy School And others
NMWD Novato	Novato	2,854	507	262	3,116	No, with condition.	In non-drought years with Sonoma County Water Agency (SCWA) able to provide NMWD's annual entitlement of water, NMWD would have sufficient supply.	800 Atherton 8901 Redwood Blvd 275 Olive Ave 300 Olive Ave

Table H-3.2: Water Capacity for New Development

Water Service Area	Communities Served	Existing Units	Sites Inventory Units	Development Potential	Countywide Plan Buildout	Supply Deficits for Inventory	Notes / Description of Limitation	Inventory Sites
							However, due to the current drought, SCWA has limited availability of water. Additionally, NMWD has a suspension of new connections in the Novato Service area. (Emergency Ordinance 41).	
NMWD West Marin	Point Reyes Station, Olema, Bear Valley, Inverness Park, Paradise Ranch Estates	790	220	472	1,262	No, with condition	Due to the current drought, NMWD has a suspension of new connections in the West Marin Service area. (Emergency Ordinance 39)	54 B St 11445 State Route 1 100 Commodore Webster 9 Giacomini 60 Fifth St 510 Mesa

Table H-3.2: Water Capacity for New Development

Water Service Area	Communities Served	Existing Units	Sites Inventory Units	Development Potential	Countywide Plan Buildout	Supply Deficits for Inventory	Notes / Description of Limitation	Inventory Sites
BCPUD	Bolinas	722	13	75	797	Yes	Currently at capacity. Due to current moratorium, future water demand anticipated to remain at or near current levels.	31 Wharf Rd 430 Aspen Rd 534 Overlook Dr
SBCWD	Stinson Beach	825	13	60	885	No, with condition.	No restrictions on new connections are identified, however, SBCWD approved a water rationing ordinance in August 2021 in response to drought conditions.	10 Willow Ave 122 Calle del Mar 195-193-35

Table H-3.2: Water Capacity for New Development

Water Service Area	Communities Served	Existing Units	Sites Inventory Units	Development Potential	Countywide Plan Buildout	Supply Deficits for Inventory	Notes / Description of Limitation	Inventory Sites
MBCSD	Muir Beach	143	0	10	153	N/A	Sufficient water capacity assumed for existing units. In recent drought conservation mandates have been enacted.	None
CSWS (Cal Water)	Dillon Beach	273	0	3	276	N/A	Unknown	None
EMWS	Dillon Beach	133	0	40	173	N/A	Unknown. .	None
Unserved Areas	Fallon, Inverness Park, Marshall, Nicasio, Tomales, Valley Ford	356	138	853	1,209	N/A	Water capacity dependent on availability of alternative sources, such as on individual groundwater wells, surface water, or small spring-based systems.	4449 & 5600 Nicasio Valley Rd 26825 State Route 1 102-080-19 & 20 200 Valley Ave 29 John St 27235 & 27275 State Route 1

Table H-3.2: Water Capacity for New Development

Water Service Area	Communities Served	Existing Units	Sites Inventory Units	Development Potential	Countywide Plan Buildout	Supply Deficits for Inventory	Notes / Description of Limitation	Inventory Sites
								102-062-01 102-075-02, 06 & 07 290 Dillon Beach Rd
Total	Unincorporated Marin	27,141*	3,630**	4,658++	31,799+	N/A	N/A	N/A

*Existing Units from Figure III-1 in Section III: Constraints and Opportunities for Housing Development of Marin County Housing Element 2015-2023. According to Chapter 2: Housing Needs Analysis of this 2023-2031 Housing Element, "Population Trends" section, the total population of unincorporated Marin County decreased by 539 between 2010 and 2021". Therefore, it is assumed the number of existing units in Unincorporated Marin indicated for each water district remains unchanged from the previous Housing Element update.

**Chapter 4: Resources of this 2023-2031 Housing Element, Table H-4.6 "Sites Inventory by Community"

+ Countywide Plan Buildout Units from Figure III-1 in Section III: Constraints and Opportunities for Housing Development of Marin County Housing Element 2015-2023. It is assumed the number of Countywide Plan Buildout units indicated for each water district remains unchanged from the previous Housing Element update.

++ Difference between Countywide Plan Buildout column and Existing Units column.

Despite a limited water supply, water districts have historically indicated sufficient projected supply to meet demand, with the exception of Bolinas Community Public Utility District (BCPUD), where there is a moratorium on new water meters that has been in effect since 1971 and Inverness Public Utility District (IPUD), where the system is dependent upon day-to-day flows, has no storage system and is over design capacity. Availability of IPUD water declined below customer demand during the drought year of 2021 and a Water Shortage Emergency was declared. Sites designated for housing development in BCPUD and IPUD are limited to redevelopment projects which can match or decrease demands to below existing usage within parcels that already have a metered water supply.

Other parts of the unincorporated County are served by North Marin Water District (NMWD), the majority of whose supplies are dependent upon water purchased from Sonoma County Water Agency and piped into the County. In NMWD's West Marin service area, the majority of water supplies are dependent upon water drawn from wells. In addition, parts of the unincorporated County are served by Marin Municipal Water District (MMWD), the majority of whose supplies are dependent upon water stored in Marin County reservoirs. When NMWD, in their Novato service area, and MMWD, have access to full annual water entitlements and full reservoir capacity, they are able to accommodate population growth as indicated in their "2020 Urban Water Management Plan for North Marin Water District" and "MMWD Water Resources Plan 2040."

However, due to drought impacts in Sonoma County, NMWD is not able to receive its full annual entitlement from Sonoma County Water Agency and has adopted an ordinance imposing moratoriums on new connections in order to work within its restricted supply. In the West Marin service area, NMWD has enacted emergency water conservation ordinances which include no new water service connections. Additionally, until recently MMWD had imposed restrictions on connections for irrigation for new development due to water shortages in its reservoirs as a result of multiple years of less than average rainfall. MMWD's restriction on irrigation connections was lifted in 2022 because large storm events in the winter of 2021-2022 filled the reservoirs.

Because there is uncertainty in the future about the amount of water that would be available for the Districts to supply to customers during the current, ongoing drought, and the Districts are in the early stages of seeking alternate water sources, possible multiple new connections for sites designated for housing development could result in demands in excess of available supply during dry and multiple dry years.

The Housing Element's Program 11 describes several strategies to mitigate water supply constraints, including implementing a new State requirement for county jurisdictions to take over very small water connections and wells (less than 20

connections); promoting sustainability strategies; and conducting a strategic water supply assessment to increase supply.

The environmental review conducted for the Marin Countywide Plan in 2007, and in 2022 for the Marin County Housing Element Update, determined that development to the point of buildout would have significant and unavoidable impacts with respect to water supply. While the County's RHNA allocation of 3,569 units for this planning cycle and projected development into the future do not approach the 4,476 additional housing units calculated as future buildout for unincorporated Marin, NMWD recently revised their 2020 Urban Water Management Plan to include updates to anticipated future demands, and determined that the provision of water will be dependent upon return to pre-drought supply levels or finding alternate water sources. Additionally, the environmental review in 2022 determined that while four of Marin's water districts, including those that serve the largest customer bases, face capacity concerns given current supplies, alternative measures are being investigated as part of the districts' long-term plans. Alternative measures being investigated include, but are not limited to, expanding recycled water use, winter water from Sonoma County Water Agency, the construction of infrastructure to import water purchased from third parties and water from potential future permanent local or regional desalination facilities. At present, however, the housing sites included in the Bolinas and Inverness Districts have water meters and are able to obtain water for housing development when the water demand for the development is equal to or less than existing demand. The other districts have adequate capacity to serve the County's assigned regional housing needs.

In addition, the Housing Element EIR determined that development to the point of buildout would have less than significant environmental impacts as a result of the construction of water supply infrastructure. It was noted the cost related to the expansion of infrastructure could be prohibitive for the size of developments proposed.

Wells

Locales beyond the current municipal and community water service areas rely on individual groundwater wells, surface water, or small spring-based systems. These areas are subject to larger minimum lot requirements, partially in need to accommodate various setback requirements which exist to protect and operate water wells and septic systems. While the lots are larger, finding adequate locations to site wells and septic systems in addition to the associated setback requirements limits the potential for construction of multi-family units. Sources for water must be perennial. Finding little to no groundwater or poor quality water in a parcel can further result in limited residential capacity. Accordingly, the Sites Inventory consists of properties mostly located in the City-Centered Corridor, where services are available.

Small water systems can be constructed where groups of parcels maintain common infrastructure for supply and draw water from one substantial source or contribute water from multiple sources to common storage. While a small water system will be reviewed in part by the local jurisdiction, approval of the small system ultimately rests with the State Water Resources Control Board. Technical reports must be provided including, but not limited to, analyzing the ability to connect to other public systems within 3 miles, in addition to quality of and the ability of the proposed water system to meet 20-year water demands under a variety of hydrologic conditions (Association of California Water Agencies (ACWA) New Water System Approval Fact Sheet). ACWA cautions that while lower up-front costs for small water systems seem attractive, the long-term maintenance and operating costs can affect housing affordability through potential future assessments. Addressing the stability of the water system in advance is critical.

The permitting process and associated costs for well construction, shown in Table H-3.3, do not constitute a constraint to development, as the costs are relatively minimal in relation to overall development costs.

Table H-3.3: Permit Application Costs for Wells

Permit Application / Task	Cost
Water Well Drilling - initial	$1,279.00
Water Well Drilling – each additional	$362.00
Water Well Repairs and Upgrades	$1,205.00
Domestic Water Supply Permit (up to 5.75 hr)	$1,256.00
State Small Water Permit (up to 6.5 hr)	$1,651.00
State Small Water Permit – Annual Fee	$894.00
Common Water System Permit (up to 6.25 hr)	$1,309.00
Amended Domestic Water Supply Permit (up to 4 hr)	$852.00

Source: Wells & Water Systems Permits & Fees effective 7/1/2019, Marin County Environmental Health Services

Sewer

There are thirteen sanitary sewer districts and service areas, and six sewage treatment plants in the City-Centered Corridor. Two sewage treatment plants intercept wastewater from more than one sanitary district or service area. There are two districts in West Marin, each with sewer lines and a treatment facility. One of these districts, the Bolinas Community Public Utility District, has a moratorium on new sewer connections that has been in effect since 1985 (see Table H-3.4, below).

Table H-3.4: Sanitary Districts / Service Areas and Corresponding Sewage Treatment Plants

Sanitary District / Sanitary Service Area	Sewage Treatment Plant
City Centered Corridor	
Novato Sanitary District	Novato Sanitary District
Las Gallinas Valley Sanitary District	Las Gallinas Valley Sanitary District
San Rafael Sanitation District	Central Marin Sanitation Agency
Ross Valley Sanitary District	Central Marin Sanitation Agency
Sanitary District No. 2	Central Marin Sanitation Agency
City of Larkspur	Central Marin Sanitation Agency
Alto Sanitary District	Sewerage Agency of Southern Marin
Almonte Sanitary District	Sewerage Agency of Southern Marin
City of Mill Valley	Sewerage Agency of Southern Marin
Homestead Valley Sanitary District	Sewerage Agency of Southern Marin
Tamalpais Community Services District	Sewerage Agency of Southern Marin
Richardson Bay Sanitary District	Sewerage Agency of Southern Marin
Tiburon Sanitary District No. 5	Tiburon Sanitary District No. 5
Sausalito-Marin City Sanitary District	Sausalito-Marin City Sanitary District
West Marin	
Bolinas Community Public Utility District	Bolinas Community Public Utility District
Tomales Village Community Services District	Tomales Village Community Services District

Generally, the sewage treatment plants have adequate capacity to treat wastewater from their service areas. However, during, and for a period of time after rain events, the underground pipe systems collect surface water and groundwater, particularly where the infrastructure is older. In the wastewater industry this is known as inflow and infiltration (I & I). There is typically I & I throughout the year, but when I & I increases during a storm event and is combined with normal wastewater flows, the total amount of effluent in the pipe systems has the potential to overwhelm the capacity of the treatment plants. Various sewage treatment plants in Marin have already or are in the process of completing improvement projects to address potential growth, wet weather capacity issues and more stringent state and federal regulations. For example, the Sausalito-Marin City Sanitary District completed upgrades to their treatment plant in Fall of 2021 and Novato Sanitary District finished construction and put a new treatment plant into service in 2011.

The sewage pipe systems throughout Marin County vary in whether they are under, or are of sufficient capacity. Where pipe systems are under capacity, reasons may include material age, material condition, I & I, and being undersized for the amount of development which ultimately occurred in a general area. Sanitary districts typically develop and periodically update plans for the maintenance and upgrade of their system infrastructure. Part of these plans address mitigating I & I which helps to address capacity issues in the pipeline systems and at the sewage treatment plants in addition to preparing to protect sewer infrastructure from potential below- and above-ground impacts from sea level rise. As properties are developed or redeveloped, analyses may be required to determine whether increases in housing unit density, above the density used for master planning of the districts' systems in that location, would necessitate infrastructure upgrade downstream of the site.

Large areas of the County are served by on-site wastewater (septic) systems. As described in greater detail below, the County Environmental Health Services office regulates septic systems.

Analysis:

As shown in below, Marin wastewater facilities are able to accommodate additional housing development above and beyond the RHNA allocation for this planning cycle. This excludes the Bolinas Community Public Utility District, which, as previously discussed has had a long-term moratorium on new sewer connections. Bolinas has a sewer system (BPUD) which will provide connection to the Mesa and 31 Wharf projects; the others have on-site septic systems. All areas within the Housing Overlay Designation and New Religious and Institutional Facility Housing Overlay and Affordable Housing Combining District (AH) are within a sanitary district or a service district that is responsible for ensuring wastewater effluent is treated.

Table H-3.5: Existing Wastewater Treatment Capacity and Projected Wastewater Flows at Buildout

Wastewater Treatment Agency	Communities Served	Treatment Capacity (MGD, dry-weather flow)	2022 Remaining Capacity (MGD, dry-weather flow)	Additional Flow at Buildout (MGD)	Remaining Capacity after Buildout (MGD)	Inventory Sites
Sausalito-Marin City Sanitary District	Sausalito, Marin City, Tamalpais Valley, Marin Headlands, Muir Woods and surrounding areas	6[a]	4.2[a]	0.13	4.1	160 Shoreline 190 A Donahue 626 & 639 Drake 260 Redwood Hwy Frontage Alta Ave 205 Tennessee Valley Rd 101 Donahue 200 Phillips
Sewerage Agency of Southern Marin	Mill Valley, Richardson Bay, Tamalpais Valley, Almonte, Alto, Homestead Valley and surrounding areas	3.6	1.38[b]	0.04	1.34	690, 800 Redwood Hwy Frontage 217, 375 Shoreline Hwy 70 N Knoll Rd Eagle Rock Rd 23 Reed Blvd 204 Flamingo 052-041-27 Shoreline Hwy 049-231-09 (Marin Dr)

Table H-3.5: Existing Wastewater Treatment Capacity and Projected Wastewater Flows at Buildout

Wastewater Treatment Agency	Communities Served	Treatment Capacity (MGD, dry-weather flow)	2022 Remaining Capacity (MGD, dry-weather flow)	Additional Flow at Buildout (MGD)	Remaining Capacity after Buildout (MGD)	Inventory Sites
Sanitary District No. 5	Tiburon, Belvedere and surrounding areas	unknown	unknown	0.03	unknown	N/A
Central Marin Sanitation Agency	San Rafael, Ross Valley, Larkspur, Corte Madera, Kentfield, Greenbrae, Ross, San Anselmo, Fairfax, Sleepy Hollow, Murray Park, San Quentin and surrounding areas	10.0c	unknown	0.18	unknown	329 Auburn St 25 Bayview 700, 935, 2400, 2410 Sir Francis Drake 071-132-11 (Sir Francis Drake) 139 Kent Ave 177-011-13 (Fawn Dr) 215 Bon Air 1111, 1125, 1129 Sir Francis Drake 022-071-05 (Tamalpais Rd) 4, 60 & 100 Sacramento Ave 177-220-41 (San Francisco Blvd) 404 San Francisco Blvd
Las Gallinas Valley Sanitary District	San Rafael, Marinwood, Terra Linda, Santa Venetia, Smith Ranch Road, Lucas Valley and surrounding areas	2.9d	unknown	0.18	unknown	Los Ranchitos 2 Jeannette Prandi 155 Marinwood 1565 Vendola North San Pedro Road parcels 1 St. Vincents Dr

Table H-3.5: Existing Wastewater Treatment Capacity and Projected Wastewater Flows at Buildout

Wastewater Treatment Agency	Communities Served	Treatment Capacity (MGD, dry-weather flow)	2022 Remaining Capacity (MGD, dry-weather flow)	Additional Flow at Buildout (MGD)	Remaining Capacity after Buildout (MGD)	Inventory Sites
						530 Blackstone Dr 1501 Lucas Valley Rd 7 Mt Lassen Dr 180-261-10 Oxford Dr San Pablo Ave parcels Edgehill Way
Novato Sanitary District	Novato and surrounding areas	7.05f	3.77g	0.46	3.31	350, 618, 654 & 800 Atherton 2754 Novato Blvd 8901 Redwood Blvd 275 & 300 Olive Ave 5, 11, 50 & 55 Harbor Dr 50 H Lane
Bolinas Community Public Utility District	0.065h	0.01h	0.02	-0.01	0.065h	1 Olema Bolinas Rd 32 Wharf Rd 193-020-38
Tomales Village Community Services District	0.038i	0.016i	0.040	-0.024	0.038i	102-080-10, 13, 19, 20 & 21 (State Route 1) 26825, 27235, 27275 State Route 1 200 Valley Ave 29 John St

Table H-3.5: Existing Wastewater Treatment Capacity and Projected Wastewater Flows at Buildout

Wastewater Treatment Agency	Communities Served	Treatment Capacity (MGD, dry-weather flow)	2022 Remaining Capacity (MGD, dry-weather flow)	Additional Flow at Buildout (MGD)	Remaining Capacity after Buildout (MGD)	Inventory Sites
						102-062-01 (Dillon Beach Rd) 102-075-02, 06 & 07 (Shoreline Hwy) 290 Dillon Beach Rd
N/A: On-site wastewater treatment	Point Reyes Station, Nicasio, San Geronimo Valley, Stinson Beach	N/A	N/A	0.3	N/A	9840, 10189, 10905, 10979, 11445, 11598 State Route 1 172-350-22 5800, 6001, 6760, 6900, 7120, 7282, 12781, 12784, 12785, 12786, 12852 13270, 13271 Sir Francis Drake 2 Toby St 54 B St Balmoral Way parcels 4299, 4449 & 5600 Nicasio Valley Rd 100 Commodore Webster 9 Giacomini 60 Fifth St 510 Mesa Rd & Mesa Rd parcels 10 Willow Ave 28 & 108 Arenal Ave 122 Calle del Mar

Table H-3.5: Existing Wastewater Treatment Capacity and Projected Wastewater Flows at Buildout

Wastewater Treatment Agency	Communities Served	Treatment Capacity (MGD, dry-weather flow)	2022 Remaining Capacity (MGD, dry-weather flow)	Additional Flow at Buildout (MGD)	Remaining Capacity after Buildout (MGD)	Inventory Sites
						23 Reed Blvd B St Shoreline Hwy parcels 428 W Cintura 33 Castle Rock

a. Sausalito-Marin City Sanitary District Sewer System Management Plan. SMCSD services population of 18,000. (18,000 x 100 (gal/capita)/day = 1.8 MGD) Remaining Capacity = 6 mgd – 1.8 mgd = 4.2 mgd

b. Sewerage Agency of Southern Marin Wastewater Treatment Plant Master Plan: WWTP capacity 3.6mgd average dry weather flow (ADWF). Observed ADWF in 2014 was 2.22 mgd. Remaining Capacity = 3.6 mgd – 2.22 mgd = 1.38 mgd. Anticipated that ADWF will increase to 2.34mgd by 2035 due to population projections used for their Master Plan.

c. CMSA 2017 Facilities Master Plan Final Report – October 2018

d. Las Gallinas Valley Sanitary District website "Our Service Area": http://www.lgvsd.org/about-us/our-service-area/

e. Las Gallinas Valley Sanitary District Sewer System Management Plan Capacity Assessment Sept 2008: Wastewater flow projections for 2020

f. Novato Sanitary District Sewer System Management Plan rev. July 2020

g. Novato Sanitary District Wastewater Collection System Master Plan October 2019. NSD projection for 20 years is that base flow will increase to 4.14 mgd

h. BCPUD Sewer System Management Plan. Difference between Maximum Treatment Capacity and average peak dry weather flow on peak generation day.

i. The Tomales Village Community Services District Sewer System Management Plan Final 2012

j. Design flows vary by district. For this analysis [315gpd/unit = (3.5 persons/residence)(90gpd/person) = 315gpd] from Novato Sanitary District Standard Specifications was applied to estimate flows generated in each district.

Housing development in areas not served by sanitary sewers generally require more land per dwelling unit to accommodate construction of septic systems within the parcel. Finding adequate locations to install septic systems, combined with septic system setback requirements can limit the potential for construction of multi-family units in the Inland Rural and Coastal Corridors. Properties near streams, baylands, and in the lowlands of the Inland Rural Corridor are heavily constrained by high groundwater, which can result in limited residential capacity. To increase residential density within a property, site specific septic investigation in coordination with planning for improvements, sometimes including wells, would be needed to determine how many units the land could feasibly accommodate. Alternatively, if the property is in proximity to a sewer district service area, and connection to the district's pipeline system is feasible, annexation into the sewer district's service area could be explored.

Septic

Septic systems are utilized on properties throughout the County (see Countywide Plan Map 2-8 for parcels with buildings and septic systems). Septic use is typical in the rural areas of West Marin and low-density residential areas such as the northern side of the Tiburon Peninsula and parts of unincorporated Novato. The County utilizes a permitting procedure for the design of new septic systems that requires review of engineering plans. There are two types of septic systems – standard and alternative – available to address a range of site-specific factors. Both types of septic systems are subject to the County's permitting process for wastewater treatment and disposal. Standard septic system design is based on accepted design principles that are assumed to ensure proper functioning of the system for extended periods. Because standard systems are expected to operate properly with property owner maintenance, there is no County inspection process after the initial inspection. Older septic systems within the County are standard septic systems. Alternative septic systems may be necessary when site conditions do not lend themselves to installation of a standard type of system. However, because these are based on newer technologies, ongoing inspections are required to ensure proper operation. County Environmental Health Services strives to respond to requests for septic system permits within 30 days of submission of the septic system design. The permitting process and associated costs, shown in Table H-3.6, do not constitute a constraint to development, as the costs are relatively minimal in relation to overall development costs and are necessary to protect the health and safety of the community and environment. However, a discretionary permit (Coastal Development Permit, CDP) through the Coastal Commission, is required to install septic systems in Coastal zones. CDP permits can take up to 120 days. The numbers in Table H-3.6 only reflect fees associated with septic system installation and do not account for design and construction costs.

Table H-3.6: Permit Application Costs for Septic Systems

Permit Application Task	Standard Septic System Cost	Alternative Septic System Cost
Site Evaluation (soil profiles) (up to 5.5 hr)	$1,138.00	$1,138.00
Percolation Test (pre-soak and test) (up to 7 hr)	$1,460.00	$1,460.00
Pre-Application Fee (Septic Permit)	$1,009.00	$1,009.00
New System. Upgrade	$3,326.00	$4,826.00
Repair (Standard up to 10 hr) (Alternative up to 20 hr)	$2,084.00	$4,361.00
Operating Permit (Residential w/Consultant Inspection) (Annual Biennial Monitoring Fee)	$505.00	$505.00
Field Review	$490.00	$490.00

Source: Septic Systems Permits & Fees effective 7/1/2019, Marin County Environmental Health Services

Development setbacks and the preservation of riparian vegetation can minimize the adverse effects of wastewater discharge. The County maintains information on its website for community members about septic systems and maintains a database to help improve the management of septic systems throughout the County.

Many of the sites in the Housing Element inventory are located in areas with existing services. However, the Housing Plan in this Element includes a program to help explore options for multi-family development that is constrained by septic systems. Actions include developing standards for multi-family development in septic areas and updating the County's methodology for calculating septic capacity. These actions will help resolve potential constraints that may occur with sites being proposed in areas with septic systems.

Environmental Constraints

Remaining vacant lands in the unincorporated County zoned for residential uses tend to have significant environmental constraints which either substantially increase construction costs or preclude development altogether, including sites with steep slopes or wetland habitats. Some of these constraints are described below.

Flood Control and Management

Stream Conservation Areas

The Marin Countywide Plan has established a Stream Conservation Area (SCA) ordinance to protect streams and their adjacent habitats from the impacts of development. The SCA policies are applied to projects that require discretionary entitlements (Planning Permits). The SCA ordinance helps to preserve habitat areas for plants and animals as well as provide areas to absorb and slow waters discharged from development. The SCA ordinance also provides and helps to preserve floodplain and overflow areas to "distribute flood waters and help prevent damage to structures, property, and natural habitat during substantial flood events" (Land Owner Resource Guide for Properties near Streams, County of Marin, May 2016).

In City-Centered corridors, the SCA setback distance varies by the size of the lot (see Table III-7).

Table H-3.7: SCA Distances in City-Centered Corridors

Lot Size	SCA Distance
Greater than 2 acres	100 feet
½ acre to 2 acres	50 feet
Less than ½ acre	20 feet

Source: Land Owner Resource Guide for Properties near Streams 5/2016, County of Marin

In the Baylands, Inland-Rural Corridors and Coastal Zone, the SCA is delineated as described in Table H-3.8. With the exception of certain limited instances, development is prohibited in the SCA. Development within the SCA may be allowed subject to discretionary review and approval. When merging multiple properties in the City-Centered Corridors which are subject to the lesser SCA distances in their original size, constraints to providing housing could be encountered when the size of the lot increases so that the development within would be subject to larger SCA distances. In the Baylands, Inland-Rural Corridors and Coastal Zones, and generally within any developable parcel near a stream, the footprint of available land outside of the SCA

setback may limit the number of housing units to less than the number allowed by the density assigned to the parcel.

The draft SCA Ordinance for San Geronimo Valley has more restrictive requirements for activities in the SCA than for other areas of Marin. However, the draft Ordinance also includes exceptions to facilitate development on lots which are completely within the SCA and when development on the portion of a parcel outside of the SCA is infeasible. Additionally, the proposed ordinance allows development of Category 1 Accessory Dwelling Units within the SCA with ministerial approval and subject to specific size and siting requirements.

Table H-3.8: SCA Distances in Baylands, Inland-Rural Corridors, Coastal Zone and San Geronimo Valley

Lot Size	SCA Delineation Baylands, Inland-Rural Corridors (excluding San Geronimo Valley) and Coastal Zone	SCA Delineation Draft Stream Conservation Area (SCA) Ordinance for San Geronimo Valley
Any	The greater of 100 feet from the stream bank or 50 feet from the outer edge of riparian vegetation.	100 feet or more Site Assessment required for all projects. Specific Activities and Development Types allowed in SCA Buffer Permit Review Procedures and Requirements

Sources: Land Owner Resource Guide for Properties near Streams 5/2016, County of Marin and Marin County Community Development Agency Stream Conservation Ordinance webpage: https://www.marincounty.org/depts/cd/divisions/planning/stream-conservation-area-ordinance

The Countywide Plan also has goals, policies and implementation programs for the protection of wetland buffers and ridge upland greenbelts. While these buffers help to protect environmental features, they do result in constraining development. The Governmental Constraints section below looks at how y CWP policies restrict development.

Flooding During Extreme Precipitation Events

Government Code 65302 requires all cities and counties to assess their flood hazard and to prepare for potential flooding. In particular, it requires all cities and counties:

- to review and update the flood, fire hazard and climate adaptation sections of the Safety Element of the General Plan upon each revision of the housing element or local hazard mitigation plan, and
- to annually review the land use element for those areas subject to flooding identified by flood plain mapping prepared by the Federal Emergency Management Agency (FEMA) or the State Department of Water Resources (DWR), effective January 1, 2008.

Marin County Code 23.09.010 addresses statutory authorization for the enforcement of Government Code Section 65302 (Ord. 3293§1, 1999). Marin County is in compliance with §65302.d.3, §65302.g.2, §65302.g.3, and §65302.g.4 of the California Government Code, and no revisions were found to be necessary for the safety element of the Countywide Plan with respect to flood hazards, as outlined in Appendix J of the Safety Element.

Housing projects, and generally all development projects, are studied during the municipal review process for the potential to be damaged by flooding and the potential for the development to worsen flooding in an area. Development proposed in flood zones identified in the Federal Emergency Management Agency's Flood Insurance Rate Maps (FIRM's) are subject to specific requirements for floor elevations and for the various types of spaces within and under the buildings. These existing procedures will help to limit potential conflicts with any sites in the housing element inventory which are located in flood zones.

One constraint that may be encountered to providing housing in flood zones is the cost of hydraulic analyses, municipal, state and potential federal review and permitting, and construction of the project to meet the required design standards. Affordable housing projects may encounter rigorous processing requirements and restrictions, or prohibitions related to various aspects of construction, especially if receiving federal funds and subject to NEPA. Whether a project develops in a flood zone may affect the project being able to receive federal funds for development assistance.

An additional constraint which may be encountered is that the inundation depicted in the FEMA Flood Insurance Rate Maps may change due to sea level rise or related adaptation improvements. The inundation shown in current FIRMs does not account for sea level rise.

Sea Level Rise

Flooding due to sea level rise is anticipated to be a potential constraint to providing housing in the lower-elevation areas of the County adjacent to the ocean and bays. See Table H-3.9, below for the number housing units within the candidate housing sites which are potentially affected by sea level rise.

Table H-3.9: Number of Housing Units Potentially Affected by Sea Level Rise

Sea Level Rise Height[a]	Number of Potential Housing Units which begin to be affected[b, c]
1 foot	799
2 feet	2518[d]
3 feet	49
4 feet	681
5 feet	142

a. As the parcel is viewed with Sea Level Rise layers in www.marinmap.org.

b. Includes Bonus Density

c. All housing units proposed for a site are included in tally once the Sea Level Rise footprint encroaches within the parcel. Ultimate plans for development may further delay sea level rise encroachment to some or all of housing units affected, depending on the sea level rise encroachment and how housing is sited within the parcel(s).

d. Includes St. Vincent's Candidate Housing Site (2430 units).

The County and some of the rural towns and communities are already planning and implementing projects in response to sea level rise.

Project consideration should include the timeframe for flooding to occur (i.e., near-term, long-term) and whether regional projects have the potential to be completed in the future to protect and preserve existing development in an area. There are many areas in the County along the bays and the coast which are projected to be permanently under water as sea levels rise. It is anticipated that projections will be adjusted as predictive models are updated based upon observed rates of rise. The potential exists for inundation mapping around a parcel to change in response to adjustments in these projections. Additionally, inundation mapping may change as protective and adaptive strategies and improvements are implemented regionally to respond to sea level rise.

Proposed housing in low areas which could be affected by sea level rise are in neighborhoods where housing already exists, and other homes will also be affected. If access is predicted to be cut off in the medium to long-term time frame, and there is time to potentially plan and construct improvements to protect the entire area before

sea levels rise, then housing does have the potential to be viable and could be constructed.

Emergency Access and Evacuation Routes

As described in the Natural Systems and Agricultural Element of the CWP, with most easily buildable land already developed, construction increasingly is being proposed on the remaining marginal lots with difficult access and steep hillsides, which are subject to slope instability and are vulnerable to rapid changes in fire behavior. Bluff erosion is threatening coastal homes built when bluff edges seemed safely distant. Vegetation that can fuel fires has increased because natural fires have been suppressed, and residential development continues to encroach on wildlands. Proliferation of impermeable surfaces, alteration of natural drainage patterns, and the effects of climate change have increased the frequency and severity of flood events (as described above).

Ensuring adequate access for emergency vehicles and evacuation in areas with hazard potential can reduce risks to people and property. Appropriate placement and engineering of foundations can render buildings less prone to ground shaking and liquefaction. Adequate site clearing and construction techniques such as fire sprinklers can help reduce the threat of fire. County zoning and development standards help mitigate flood damage by limiting what can be built in flood-prone areas. Special attention must be paid to land use activities at the urban-wildland interface zone, where people and property may be particularly susceptible to environmental hazards. For the Housing Element sites inventory, evacuation routes were considered as part of the site selection process any many of the larger sites have more than one access point. In addition the County's existing procedures described above and additional actions included in this element will help to minimize constraints between environmental hazards and the sites included in the housing element inventory.

Governmental Constraints

While the unincorporated County covers a large land area, most of the land is not zoned for residential development, as it is publicly owned as parkland, watershed, or open space. Agricultural conservation easements and related zoning also limit the ability to develop vacant lands. The most suitable land for residential development has already been developed.

Regulatory standards provide consistency and foster a high-quality and cohesive built environment. Standards may also present conflicts in land use objectives and pose constraints to the production of multifamily and affordable housing. The following discussion analyzes land use regulations, procedures, and fees to identify possible solutions to policy conflicts. Government Code Section 65583(a)(5) requires that local agencies analyze governmental constraints that hinder the agency from meeting its Regional Housing Needs Allocation.

Transparency in Development Regulations

To increase transparency and certainty in the development application process as required by law (Government Code section 65940.1), the County provides a range of information online for ease of access. Examples of some information that is provided includes:

- Countywide Plan https://www.marincounty.org/media/files/departments/cd/planning/currentplanning/publications/county-wide-plan/cwp_2015_update.pdf
- Local Coastal Plan https://www.marincounty.org/depts/cd/divisions/planning/plans-policies-and-regulations/local-coastal-program
- Development Code, including the County's affordable housing requirements https://library.municode.com/ca/marin_county/codes/municipal_code?nodeId=TIT22DECO
- Community Area Plans https://www.marincounty.org/depts/cd/divisions/planning/plans-policies-and-regulations/community-and-area-plans
- Single Family and Multi Family Residential Design Guidelines https://www.marincounty.org/depts/cd/divisions/planning/plans-policies-and-regulations
- Planning Application Guidelines, Fee Schedule and Forms https://www.marincounty.org/depts/cd/divisions/planning/planning-applications-and-permits

- Building Permit Forms and E-Permit Filing
  https://www.marincounty.org/depts/cd/divisions/building-and-safety/forms
- The County also posts impact fees and other exactions, the current year and five previous fee and financial reports required by 66000(b) and 66013(d) and Impact and cost of service studies since 1-1-18.

Land Use Controls

Countywide Plan

Adopted in 2007, the Marin Countywide Plan is the guiding land use document for the unincorporated County. The Countywide Plan divides the County into four corridors:

- The Coastal Corridor – Adjacent to the Pacific Ocean, this corridor is designated for federal parklands, recreational uses, agriculture, and the preservation of existing small coastal communities.
- The Inland Rural Corridor – Located in the central and northwestern part of the county, this corridor is designated for agriculture and compatible uses and for the preservation of existing small communities.
- The City-Centered Corridor – This corridor runs along U.S. Highway 101 in the eastern part of the county near San Francisco and San Pablo bays and is designated for urban development and protection of environmental resources. This corridor is divided into six planning areas that correspond with distinct watersheds.
- The Baylands Corridor - Encompassing tidal and largely undeveloped historic baylands along the shoreline of San Francisco and San Pablo bays, the corridor provides heightened recognition of the unique environmental characteristics of this area and the need to protect its important resources.

As a strategy for dealing with the environmental constraints described above, the County has adopted policies in the Countywide Plan that promote opportunities for reuse of underutilized commercial centers, support mixed-use development, and encourage more dense development along transit routes. Marin County also encourages residential development in more urbanized areas or within villages in the Inland Rural and Coastal Corridors.

Countywide Plan Goals and Policies Regarding Development Densities

Many goals, policies and implementation programs in the CWP that aim to limit development to the lowest end of the permitted range. These include policies to protect streams, Ridge and Upland Greenbelt Areas, wetlands, riparian areas and the Baylands. Limiting development to the lowest end of the permitted range is also encouraged in the CWP for locales beyond the current municipal and community water service areas and rely on individual groundwater wells, surface water, or small spring-based systems.

Only allowing development at the lowest end of the permitted range constrains new housing, including the potential for affordable housing projects to be permitted at a higher density. However, the CWP exempts affordable housing projects from the lowest end of the density range requirements.

In addition, On October 9, 2019, Gov. Gavin Newsom signed the Housing Crisis Act of 2019 (HCA) into law, commonly known as Senate Bill (SB) 330. HCA restricts the adoption of land use or zoning amendments that would result in the reduction of allowed residential density or intensity of land uses than what is allowed under the regulations in effect on January 1, 2018. The law defines "less intensive use" to include, but is not limited to, reductions to height, density, or floor area ratio, new or increased open space or lot size requirements, new or increased setback requirements, minimum frontage requirements, or maximum lot coverage limitations, or anything that would lessen the intensity of housing. SB 330 affects portions of Marin.[7]

Countywide Plan Land Use Categories

The Countywide Plan establishes the land use designations for the unincorporated County (see Table H-3.10 below). As described in the County's 2020 Multi-Family Land Use Policy and Zoning Study, while there are a variety of land use designations, 75% of parcels in the unincorporated area have Single-Family Countywide Plan land use designations. In contrast, significantly fewer parcels are designated with other land uses, including eleven percent of parcels designated with multi-family land uses, seven percent of parcels designated with agriculture/conservation land uses, and three percent or less designated with business/institutional, open space/park, Housing Overlay Designation and New Religious and Institutional Facility Housing Overlay, and floating home land uses. The predominance of single-unit land use designations is a constraint for promoting other types of residential uses, including those can serve residents of all income categories.

Table H-3.10: Marin Countywide Plan Land Use Categories

Type of Land Use	Countywide Plan Land Use Designation	Minimum Lot Size/Density Ranges	Notes
Agricultural and Conservation	Agricultural and Conservation 1 (AGC 1)	1 du/31 to 60 acres	
	Agricultural and Conservation 2 (AGC 2)	1 du/10 to 30 acres	

[7] SB 330 sunsets on January 1, 2030.

Type of Land Use	Countywide Plan Land Use Designation	Minimum Lot Size/Density Ranges	Notes
	Agricultural and Conservation 3 (AGC 3)	1 du/2 to 9 acres	
Agriculture	Agriculture 1 (AG 1)	1 du/31 to 60 acres	
	Agriculture 2 (AG 2)	1 du/10 to 30 acres	
	Agriculture 3 (AG 3)	1 du/1 to 9 acres	
Very Low Density Residential	Single-Family 1 (SF1)	20 to 60 acres	Established for development on large properties in rural areas where public services are very limited or nonexistent and where significant physical hazards and/or natural resources significantly restrict development.
	Single-Family 2 (SF2)	5 to 19 acres	
Rural/Residential	Single-Family 3 (SF3)	1 to 5 acres	Established in areas where public services are limited and on properties where physical hazards and/or natural resources restrict development.
	Single-Family 4 (SF4)	1 to 2 du/acre	
	Planned Residential (PR)	1 unit per 1 to 10 acres	
Low Density Residential	Single-Family 5 (SF5)	10,000 to 20,000 sq ft. lots 2 to 4 du/ac	Established for single-family and multi-family development in areas where public services and some urban services are available. Properties are not typically limited by physical hazards or natural resources.
	Single-Family 6 (SF6)	Less than 10,000 sq. ft. lots 4 to 7 du/ac	
	Multi-Family 2 (MF-2)	1 to 4 du/ac	
Low to Medium Density Residential	Multi-Family 3 (MF3)	5-to 10 du/ac	Established where moderate density single-family and multi-family residential development
	Multi-Family 3.5 (MF3.5)	5 to 16 du/ac	

Type of Land Use	Countywide Plan Land Use Designation	Minimum Lot Size/Density Ranges	Notes
			can be accommodated in areas accessible to a range of services including major streets, transit services and neighborhood shopping.
Medium to High Density Residential	Multi-Family 4 (MF4)	11 to 30 du/ac	Established within the City-Centered Corridor and in communities or villages where multi-family development can be accommodated with easy accessibility to a full range of urban services.
	Multi-Family 4.5 (MF4.5)	11 to 45 du/ac	
Commercial/Mixed-Use	General Commercial/Mixed Use (GC)	The Countywide Plan includes criterial for residential uses in mixed-use development. In general, the residential uses are permitted under the floor area ratios of the land use designation. However, projects consisting of low and very low income affordable units may exceed the FAR to accommodate additional units for those affordable categories.	
	Neighborhood Commercial/Mixed Use (NC)		
	Office Commercial/Mixed-Use (OC)		
	Recreational Commercial (RC)		
	Industrial (IND)		
Planned Designation	Planned Designation-Agricultural and Environmental Resource area (PD-Agricultural and Environmental Resource Area)		
	Planned – Designation-Reclamation Area (PD-Reclamation Area)		
Public Facility and Open Space	Public (PF)		
	Open Space (OS)		
	Quasi-Public Facility		

Source: Marin Countywide Plan, Adopted November 6, 2007.

Housing Overlay Designation (and New Religious and Institutional Facility Housing Overlay)

The 2007 Countywide Plan update established a Housing Overlay Designation (HOD) as a mechanism to accommodate a range of housing types, sizes, and prices for special needs populations and workers employed in Marin County. The purpose of the HOD is to encourage affordable housing on sites close to transit and services. Underlying land uses may include Multi-family (MF), General Commercial (GC), Neighborhood Commercial (NC), Office Commercial (OC), Recreational Commercial (RC), and Public Facilities (PF). The HOD policy identifies 11 specific sites that must be developed per HOD specifications should any development occur on the site. Additional projected HOD development may be distributed to other qualifying sites throughout urban areas within the City Centered Corridor, to a maximum of 658 residential units.

In 2018, the Board of Supervisors adopted revisions to parking standards for the Overlay Designation. Refer to the Parking Standards section of this chapter below for further details. No development proposals were received on HOD sites during the 2015-2023 planning period. Due to the lack of results from this overlay designation, this Housing Element includes a program to create a new Religious and Institutional Facility Housing Overlay. The program includes conducting outreach to religious and institutional facilities regarding the Overlay opportunity.

Growth Control Measures

The County has no growth control measures that limit the number of permits issued for housing, act as a cap on the number of housing units that can be approved, or limit the population of the County.

Community Plans

To help implement the Countywide Plan while also recognizing the unique character of the local communities, the County has adopted 22 Community Plans and Area Plans. While many of these plans were adopted in the 1980s and 1990s, three new plans have been adopted since 2015: Black Point Community Plan (2016), Green Point Community Plan (2016), and the Santa Venetia Community Plan (2017). While the community plans help to address the specific characteristics of the respective area, many community plans have policies that are a barrier to multifamily housing. Due to the need of this type of housing in the unincorporated County, the community plan policies should not override or supersede development policies set forth in the CWP. This Housing Element includes a program to amend the CWP to clarify that all development, including that located in community plan areas must comply with density policies in the CWP. This

amendment is anticipated to be completed concurrent with the Housing Element adoption.

Local Coastal Plan

The updated Marin County Local Coastal Program (LCP) Land Use Plan was adopted by the Board of Supervisors in 2018 and certified by the California Coastal Commission in 2019. The LCP is the primary document that governs land development in the Marin County Coastal Zone and may modify the Countywide Plan and Community Plans. This Coastal Zone is a strip of land and water defined by the California Coastal Act of 1976 that extends along the Pacific Ocean coastline and extends seaward from the shore a distance of three miles and a variable distance landward depending on the topography[8]. While there is no growth boundary in effect at a countywide level, there are village limit boundaries (VLBs) in effect in the nine Coastal Zone communities of Muir Beach, Stinson Beach, Bolinas, Olema, Point Reyes Station, Inverness Ridge, Marshall, Tomales, and Dillon Beach. The VLBs were established to preserve agricultural lands for agricultural use while at the same time allowing for reasonable growth within village areas in accordance with the Coastal Act.

The primary tool for implementing the LCP is the coastal development permit. The County Community Development Agency is responsible for implementing the LCP and reviewing coastal permit applications. Some types of projects, such as those that involve work on tidelands around the margin on Tomales Bay, require a permit from the California Coastal Commission.

Housing in the Coastal Zone

California Government Code Section 65588(c) requires each revision of the Housing Element to include the following information relating to housing in the Coastal Zone:

1) The number of new housing units approved for construction within the coastal zone since January 1, 1982
2) the number of housing units for persons and families of low or moderate income required to be provided in new housing developments either within the coastal zone or within three miles of the coastal zone as a replacement for the conversion or demolition of existing coastal units occupied by low or moderate income persons
3) The number of existing residential units occupied by persons and families of low or moderate income that have been authorized to be demolished or converted since January 1, 1982, in the coastal zone
4) The number of residential units for persons and families of low or moderate income that have been required for replacement units

[8] Marin County Local Coastal Program. Prepared by the Marin County Community Development Agency. Certified by the California Coastal Commission on February 6, 2019.

Between 1980 and 2020, a total of 4,559 housing units have been added to unincorporated Marin's housing stock (Table H-3.11). Since the last Housing Element revision (2015), there have been 421 total units (11 very low income units, 17 low income units, 7 moderate income units and 386 above moderate income units) constructed and 113 units demolished for a net increase of 308 units.

Pursuant to Government Code (GC) Section 65590, "the conversion or demolition of existing residential dwelling units occupied by persons and families of low or moderate income…shall not be authorized unless provision has been made for the replacement of those dwelling units with units for persons and families of low or moderate income." However, the GC further stipulates several exemptions to the replacement requirement. Specifically, GC 65590(b)(3) provides the following exemption:

1) The conversion or demolition of a residential structure which contains less than three dwelling units, or, in the event that a proposed conversion or demolition involves more than one residential structure, the conversion or demolition of 10 or fewer dwelling units.
2) The conversion or demolition of a residential structure for purposes of a nonresidential use which is either "coastal dependent," as defined in Section 30101 of the Public Resources Code, or "coastal related," as defined in Section 30101.3 of the Public Resources Code.
3) The conversion or demolition of a residential structure located within the jurisdiction of a local government which is within the area encompassing the coastal zone, and three miles inland therefrom, less than 50 acres, in aggregate, of land which is vacant, privately owned and available for residential use.
4) The conversion or demolition of a residential structure located within the jurisdiction of a local government which has established a procedure under which an applicant for conversion or demolition will pay an in-lieu fee into a program, the various provisions of which, in aggregate, will result in the replacement of the number of dwelling units which would otherwise have been required by this subdivision.

The new construction included mostly for-sale housing developments not subject to the replacement requirements. A minimum of 20% of the units developed in the Coastal Zone must also be affordable, in accordance with the Mello Act.

Table H-3.11: Coastal Zone Development (1982-2022)

Year	Units Constructed	Units Demolished	Net Gain
1988-2002	56	0	56
2003-2010	10	3	7
2010-2022	9	1	8
Total	75	4	71

Source: Marin County, June 2022

Residential Development Standards

Three primary types of uses are allowed on private properties in unincorporated Marin County: 1) agricultural, 2) commercial, and 3) residential. Zoning regulations for each of these groups are outlined in Title 22 of the Marin County Code (the Development Code), which describes uses, design standards, and requirements.

The Marin County Development Code implements the Countywide Plan and Community Plans for the unincorporated areas outside of the Coastal Zone. Under the State housing density bonus laws, housing development projects with five or more units that provide affordable units can exceed the density of the zoning district as long as the project density falls within the density range established by with the Countywide Plan Community Development Element.

Zoning Districts

Two fundamental types of zoning districts apply in unincorporated Marin: conventional and planned.

Conventional Zoning

Conventional zoning districts have specific numerical subdivision and development standards, including minimum lot area, minimum setbacks, height limits, and floor area ratio limits. Provided a development project conforms to those standards, no discretionary development applications are required. For conventional zoning, a “B” district can be combined with the base zoning. This “B” district is intended to establish lot area, setback, height, and floor area ratio (FAR) requirements for new development that are different from those normally applied by the primary zoning district applicable to a site and to configure new development on existing lots, where desirable because of specific characteristics of the area.

Currently, no conventional zones permit multi-family (MF) housing. This restriction continues the current development pattern single-family housing as the predominant choice in the unincorporated County. According to the County's 2020 Multi-Family Land Use Policy and Zoning Study, only 10% of parcels in the unincorporated County are zoned for multi-family, compared to 72% zoned for single-family uses. This Housing Element addresses this constraint by proposing that the Zoning Code be amended to allow for a multi-family zone under the conventional zoning options. Also, a program has been added for the efficient use of multi-family land, which will establish minimum densities for multi-family and mixed use zones.

Planned Zoning

Planned districts allow more flexible site designs than do conventional districts, but all sites in these districts go through discretionary approval. Flexibility is permitted to enable house design and siting that respect natural site features. Planned districts do not have specific setback requirements or minimum lot areas to encourage clustering. Ultimate development potential is based on the maximum density allowable by the zoning district and Countywide Plan. Contrary to the land use control approach used in conventional zoning districts, planned districts have few specific numerical standards. Instead, they encourage development to be clustered in the areas most suitable for development on a given site to conserve a larger portion of that site in its natural state. No minimum lot areas are established for subdivisions in planned districts, but the number of lots allowed on a property is governed by a density standard specific to that district. As a result, subdivision applications in planned districts are likely to have smaller lot sizes, with a larger percentage of the original lot left as open space, compared to subdivisions in conventional districts where lot sizes are governed by the minimum lot areas applicable to that particular district. The distinction between conventional and planned zoning districts is most important in governing the subdivision and development of properties.

Table H-3.12 below shows a list of zoning designations for the conventional and planned zoning districts by land use type.

Table H-3.12: Marin County Conventional and Planned Zoning Districts

Land Use Category	Conventional Zoning Districts	Planned Zoning Districts
Primary Agriculture	A (Agriculture and Conservation)	C-ARZ (Coastal, Agricultural Production Zone)
Mixed Agriculture/Single Family	A2 (Agricultural, Limited)	ARP (Agricultural, Residential Planned) C-ARP (Coastal, Agricultural, Residential Planned)
Single-Family	R1 (Residential, Single-family) C-R1 (Coastal, Residential, Single-family) RA (Residential, Agriculture) C-RA (Coastal, Residential, Agriculture) RR (Residential, Restricted) RE (Residential, Estate)	RSP (Residential, Single-Family, Planned) C-RSP (Coastal, Residential, Single-Family, Planned) RF (Floating Home Marina)
Two-Family	R2 and C-R2 (Residential, Two-family) C-R2 (Coastal, Residential, Two-family)	
Multi-Family		RMP (Residential, Multi-Family, Planned) C-RMP (Coastal, Residential, Multi-Family, Planned) RX (Residential, Mobile Home Park)
Business/Commercial and Mixed-Use	VCR (Village Commercial, Residential) C-VCR (Coastal, Village Commercial, Residential) C1 (Retail Business) AP (Administrative and Professional) H1(Limited Roadside Business) C-H1 (Coastal, Limited Roadside Business) RCR (Resort and Commercial Recreation)	CP (Commercial, Planned) C-CP (Coastal, Commercial, Planned) RMPC (Residential /Commercial Multiple, Planned) C-RMPC (Coastal, Residential /Commercial Multiple, Planned) OP (Office, Planned) IP (Industrial, Planned)

Land Use Category	Conventional Zoning Districts	Planned Zoning Districts
	C-RCR (Coastal, Resort and Commercial Recreation)	

Source: Marin County Municipal Code Chapter 22.10

*Notes: *In RA, RR, RE, R1 and R2 districts, the minimum lot area and setback standards may change when such district is combined with a B district in compliance with the provisions of Section 22.14.050.*

Special Purpose and Combining Zoning

The County has several special purpose and combining districts. The special purpose districts are for land uses that are unique in character or applicability. The combining districts are applied to property together with one of the other zoning districts to highlight important characteristics that require attention in project planning.

OA (Open Area) Zoning/Combining District

The OA zoning district is intended for areas of the County committed to open space uses, as well as environmental preservation. The OA zoning district is consistent with the Open Space, and Agriculture and Conservation land use categories of the Marin Countywide Plan.

PF (Public Facilities) Zoning/Combining District

The PF zoning/combining district is applied to land suitable for public facilities and public institutional uses, where a governmental, educational, or other institutional facility is the primary use of the site. The PF zoning district implements with the Public and Quasi-Public land use categories of the Marin Countywide Plan.

The PF district may be applied to property as a primary zoning district where the Board determines that the facility is sufficiently different from surrounding land uses to warrant a separate zoning district, and as a combining district where a publicly owned site accommodates land uses that are similar in scale, character, and activities to surrounding land uses.

B and BFC Combining Districts

The Minimum Lot Size "-B" combining district is intended to establish lot area, setback, height, and FAR requirements for new development that are different from those normally applied by the primary zoning district applicable to a site, and to configure new development on existing lots where desirable because of specific characteristics of the area. The Development Standards subsection below outlines those that specifically apply to properties with the “B” combining district.

As described in the County’s Development Code, the Bayfront Conservation (BFC) Combining District is intended to: 1) prevent destruction or deterioration of habitat and environmental quality, 2) prevent further loss of public access to and enjoyment of the bayfront, 3) preserve or establish view corridors to the bayfront, 4) ensure that potential hazards associated with development do not endanger public health and safety, and 5) maintain options for further restoration of former tidal marshlands. The Development Code outlines the requirements for development applications in this district and includes environmental assessments and design guidelines.

Affordable Housing Combining District

The AH combining district allows affordable housing development at a density of 20 units per acre and offers development incentives on sites that are otherwise governed by a lower density zone. This approach allows compact development to occur on portions of parcels and encourages affordable housing over market rate housing on key sites. Table H-3.13 shows the current sites under this designation.

Table H-3.13: Affordable Housing Combining District Sites

Site Name	Acres by Parcel	Acres Total	Countywide Plan 2007	Zoning 2014	AH-Combining District*
St. Vincent's / Silveira	244.768 221.71 72.66 20.22 2.82	55 developable	PD-Agriculture and Env Resource	A2:AH	AH zone - limited to 3.5 acres at 30 du/ac
Marin City Community Development	4.06	4.06	MF-2	RMP- 4.2:AH	AH zone - limited to 0.5 acres at 30 du/ac
Golden Gate Seminary	50.00 23.61	73.61	MF-2	RMP- 2.47:AH	AH zone - limited to 2 acres at 30 du/ac

Source: Marin County Community Development Agency, 2021

Development Standards

The County Development Code includes standards for residential, mixed use, and agriculture residential development. These standards are in the tables below (see Table H-3.14, Table H-3.15, and Table H-3.16). Housing is encouraged in commercial districts in the unincorporated County. The Development Code contains standards for certain commercial districts and mixed-use standards for the Commercial Planned (CP), Retail Business (C1), Administrative Professional (AP), and Limited Roadside Business (H1) commercial districts. For lots larger than two acres, at least 50% of the new floor area must be developed with new housing. For lots smaller than two acres in size, at least 25% of the new floor area must be developed with housing. Residential density in those districts is a maximum of 30 units per acre. Unit sizes are restricted to a minimum of 220 square feet and a maximum of 1,000 square feet per unit to encourage more affordable housing types. However, this unit size limit may be restrictive for families with children. Housing should be accessory to the primary commercial use, except affordable housing. A program is being included in the Housing Element that will, at a minimum allow 100% residential use in mixed use zones and examine the allowable average unit size.

Table H-3.14: Residential Development Standards in Planned Zoning Districts (Non-Coastal)

Zoning District	Density Requirements (dwelling units per acre)	Maximum Height		Development Standards	Applicable Code Sections
		Main	Detached		
RSP (Residential, Single-Family Planned District))	0.05 = 1 unit/20 acres 0.10 = 1 unit/10 acres 0.20 = 1 unit/5 acres 0.25 = 1 unit/4 acres 0.5 = 1 unit/2 acres 1.0 = 1 unit/acre 2.0 = 2 units/acre	30 feet	16 feet	Determined by site constraints and implemented through discretionary review (Master Plan/Design Review)	Chapters 22.10, 22.16 and 22.44
RMP (Residential, Multiple -family Planned District)					Chapters 22.12, 22.16 and 22.44
RMPC (Residential/Commercial Multiple Planned District)					Chapters 22.08, 22.16 and 22.44
ARP (Agricultural, Residential Planned District)	2.0 = 1 unit/2 acres 10 = 1 unit/10 acres 30 = 1 unit/30 acres 60 = 1 unit/60 acres				Chapters 22.12, 22.16 and 22.44, and Section 22.32.150
CP (Planned Commercial District)	1 unit per 1,450 square feet of lot area				

Zoning District	Density Requirements (dwelling units per acre)	Maximum Height		Development Standards	Applicable Code Sections
		Main	Detached		
OP (Planned Office District)	Determined by site constraints and implemented through discretionary review (Master Plan/Design Review)				Chapters 22.12, 22.16 and 22.44
IP (Industrial Planned District)					
RCR (Resort and Commercial Recreation District)					
RF (Floating Home Marina District)	10 floating homes per acre maximum density	16 feet	Refer to Section 2.32.075.B		Chapters 22.10, 22.32 and 22.46
RX (Residential, Mobile Home Park District)	Refer to Section 22.32.110 and Chapters 22.10, 22.16 and 22.44				

County of Marin Development Code, Revised Date: March 10, 2021

Table H-3.15: Residential Development Standards in Conventional Zoning Districts

<table>
<tr><th rowspan="2">Zoning District</th><th rowspan="2">Minimum Lot Area</th><th colspan="4">Minimum Setbacks (feet)</th><th colspan="2">Maximum Height (feet)</th><th rowspan="2">Maximum Floor Area Ratio (FAR)</th></tr>
<tr><th>Front</th><th>Side</th><th>Corner Side</th><th>Rear</th><th>Main Building</th><th>Detached Accessory Structure</th></tr>
<tr><td>R-1 (Residential, Single-Family)</td><td rowspan="5">7,500 sq ft</td><td rowspan="6">25</td><td rowspan="6">6</td><td rowspan="6">10</td><td rowspan="6">20% of lot depth/25 ft maximum</td><td rowspan="9">30</td><td rowspan="9">16</td><td rowspan="6">30%</td></tr>
<tr><td>R-2 (Residential, Two-Family)</td></tr>
<tr><td>R-A (Residential, Agricultural)</td></tr>
<tr><td>R-R (Residential, Restricted)</td></tr>
<tr><td>R-E (Residential, Estate)</td></tr>
<tr><td>A-2 (Agriculture, Limited)</td><td>2 acres</td></tr>
<tr><td>A (Agriculture and Conservation)</td><td>3 acres to 60 acres</td><td colspan="4">See Table 2-2 in Section 22.08.040 for minimum setbacks</td><td>5%</td></tr>
<tr><td>C-1 (Retail Business)</td><td rowspan="2">7,500 sq ft (refer to</td><td>0</td><td rowspan="2">6 feet adjacent to residential</td><td rowspan="2">Not applicable</td><td rowspan="2">12 feet adjacent to residential</td><td rowspan="2">Refer to CWP Land Use Designation</td></tr>
<tr><td>H-1 (Limited Roadside Business)</td><td>30</td></tr>
</table>

Zoning District	Minimum Lot Area	Minimum Setbacks (feet)				Maximum Height (feet)		Maximum Floor Area Ratio (FAR)
		Front	Side	Corner Side	Rear	Main Building	Detached Accessory Structure	
	Section 22.32.150)		district, none otherwise		district, none otherwise			and Section 22.32.150
A-P (Administrative and Professional)		25	6 feet for 1-story bldg.	10 ft for multi-story bldg. or on street side	20			

County of Marin Development Code, Revised Date: March 10, 2021

Table H-3.16: Residential Development Standards for Properties in a "B" Combining District

Zoning District	Minimum Lot Area (square feet)	Minimum Setbacks (feet)				Maximum Height (feet)		Maximum Floor Area Ratio (FAR)
		Front	Side	Corner Side	Rear	Main Building	Detached Accessory Structure	
B-1	6,000	25	5	10	20% of Lot Depth/25 maximum	30	16	30% (unless specified otherwise by the CWP and/or Community Plan)
B-2	10,000	25	10	10				
B-3	20,000	30	15	10				
B-4	1 acre		20	20				
B-5	2 acres							
B-6	3 acres							

County of Marin Development Code, Revised Date: March 10, 2021

The current development standards may result in constraints in development, particularly related to density, building height, and the discretionary planning review process. Specifically, a 30-foot height limit may constrain the development of multi-family and mixed-use development at 30 units per acre.

The Objective Development and Design Standards (underway), design guidelines and accessory dwelling units will add additional development opportunities and flexibility in single-unit zones and additional opportunities for multifamily development.

Open Space and Lot Coverage Requirements

No minimum open space or maximum lot coverage standards apply to development projects in Marin County. However, in conformance with the Quimby Act, a parkland dedication of three acres for every 1,000 people in a project area is required for subdivisions or equivalent in-lieu fee is required. See further discussion in the Fees and Exactions section below.

Parking Standards

Marin County's parking standards are based on the type of residence and number of bedrooms. Table H-3.17 below outlines current parking requirements.

In December 2018, the Board of Supervisors adopted amendments to County parking standards to be in alignment with the Housing Element and Countywide Plan. Parking space requirements were reduced for residential uses across the board and reflected state regulations for affordable housing and other developments located near public transit, tandem parking for residential uses, increased requirements for bicycle parking and access, and the allowance for electric vehicle parking to count toward traditional parking space needs[9].

[9] Ordinance of the Marin County Board of Supervisors No. 3703, Revising Chapter 24.04, Division III, Parking and Loading to Align with Housing Element and Countywide Plan, December 18, 2018.

Table H-3.17: Parking Standards

Type of Residential Unit	Minimum Parking Spaces Required per Section 24.04.340
Detached Single Family and Duplex	2 spaces per unit
Studio units	1 space per unit plus one guest space per 5 dwelling units
One bedroom units	1.25 spaces per unit plus one guest space per 5 dwelling units
Two bedroom units	1.5 spaces per unit plus one guest space per 5 dwelling units
Three or more bedroom units	2 spaces per unit plus one guest space per 5 dwelling units

Source: Marin County Municipal Code, Section 24.04.340

Reductions in Residential Parking Standards

The standards in the table above may be reduced under the following circumstances:

Senior housing - The amount of parking required for senior housing (senior housing refers to age-restricted housing designated for and occupied by seniors and consistent with definitions in California Civil Code Section 51.2, 51.3, and 51.4) may be reduced by up to 50% of that required as the base standard, where deemed appropriate by the agency and where the applicant can demonstrate that a reduction is warranted based on the type of senior citizen housing proposed.

Housing overlay designation - The amount of parking required for projects in the housing overlay designation, as defined in the 2007 Marin Countywide Plan, may be reduced by up to 50% of that required as the base standard, where deemed appropriate by the agency and where the applicant can demonstrate that a reduction is warranted based on the type of housing proposed.

Since underground parking or mechanical parking can be cost prohibitive, the Development Code Amendment program in this Housing Element will reduce the County's parking requirements to match those allowed by state density bonus law.

Design Guidelines

The County has adopted design guidelines to establish clear and comprehensive guidelines for different types of development.

Single-Family Residential Design Guidelines

Adopted by the Board of Supervisors in July 2005, the Single-Family Design Guidelines apply to individual single-family residences, as well as multiple single-family residences that may be proposed as part of a larger project (e.g., Master Plan or Subdivision). The guidelines cover the following topics: the site design process, building envelopes and relationships between properties and streets, neighborhood compatibility, reduction of visual bulk, and green and universal building designs.

As stated in the document, "the Design Guidelines are particularly relevant to development proposals that are subject to the County's Design Review process by clarifying and reinforcing the public policy objectives articulated in the Design Review findings of the Marin County Development Code. The guidelines provide visual instructions and examples of the development requirements, including grading, site lines, building envelopes, etc. At the same time, the guidelines "should not hinder creative efforts and should be applied in a reasonably flexible manner as circumstances warrant". While the guidelines apply to all single-family homes, they encourage flexible outcomes on case-by-case basis.

Marin County's Single-Family Residential Design Guidelines have had a demonstrable impact in the design review process. They assist applicants in planning site and architectural design, increase design certainty, and help minimize design revisions. These guidelines are flexible and are available on the Community Development Agency's website.

Multi-Family Residential Design Guidelines

Adopted by the Board of Supervisors in December 2013, the Multi-Family Residential Development Guidelines are intended to assist project applicants during the project design phase and County staff and decision makers in the review and approval process. While the guidelines are not objective and cannot be enforced, they do provide design criteria to assist in decision-making.

The document has several "place-based guidelines" to address the various development environments in the County, including rural towns, residential neighborhoods and mixed-use corridor/town centers. These different place-based guidelines provide for flexibility. Design principles in the document include sustainability, livability and providing a mix of housing for the County's workforce, seniors, low-wage earners and disabled residents. The guidelines also aim to "reduce

the potential cost of the County's development review process for projects that provide homes for people from a broad range of socioeconomic backgrounds".

Objective Design and Development Standards

The Objective Design and Development Standards, or Form-Based Code (FBC), which will be adopted by the end of 2022, will implement the Marin County Countywide Plan for ministerial projects and projects permitted by right or that fall under the SB 35 streamlined ministerial approval process. The FBC applies a context-sensitive approach to Marin County utilizing the following context types: Natural, Walkable, and Auto-Oriented Suburban. These contexts are further broken down into three types of areas: areas at or near the core, suburban areas, and areas at the edge of the community. The FBC zones will provide flexibility in design standards in these areas.

For applicable projects, the FBC will be combined with the Municipal Code for a hybrid approach to development. The FBC places an emphasis on form and architectural style and allows a range of uses carefully chosen to maximize compatibility between uses. The FBC provides information on allowable building types in each form-based zone and includes provisions for privacy standards, parking, building materials, a fenestration.

The FBC is intended to remove constraints by providing objective design standards for the streamlined review of housing developments and to provide the objective standards required by the Housing Accountability Act, SB 35, and other state housing laws.

Local Ordinances

The following section examines local ordinances related to housing that have been adopted by the County. The Board of Supervisors adopted Ordinance 3745 in January 2021 that included updates and revisions to the County's Density Bonus provisions. These included changes to achieve consistency with the State's Density Bonus Law, including incentives and concessions, waivers and reductions of development standards, and reduced parking requirements.

Density Bonus

The County Board of Supervisors adopted an ordinance in 2021 that was consistent with state density bonus law at that time. However, since then, there have been some additional statutory changes. This Housing Element includes a program for the County's Density Bonus ordinance to be amended to be consistent with state law.

The current density bonus provisions outlined in Section 22.24.030 of the County Development Code are calculated as follows:

1. A housing development project is eligible for a 20% density bonus if the applicant seeks and agrees to construct any one of the following:

   a. 10% of the units at affordable rent or affordable ownership cost for low income households;

   b. 5% of the units at affordable rent or affordable ownership cost for very low income households; or

   c. A senior citizen housing development of 35 units or more as defined in Section 51.3 of the Civil Code.

2. The density bonus for which the housing development project is eligible shall increase if the percentage of units affordable to very low, low, and moderate income households exceeds the base percentages established in California Government Code Section 65915(f).

3. For an affordable housing development project in which at least 80% of the units are for lower income households with any remainder for moderate income households, the following shall apply:

   a. The maximum density bonus for which the affordable housing project is eligible shall increase up to 80%, subject to the findings included in Section 22.24.030.E (Review of application).

   b. If the project is located within one-half mile walking distance of a major transit stop, as defined in subdivision (b) of Section 21155 of the Public Resources Code: (1) The project shall receive a height increase of up to three additional stories, or 33 feet; and (2) The project shall be exempt from any maximum controls on density.

   If the project is located within a one-half mile walking distance or farther of a major transit stop and receives a waiver from any maximum controls on density, the project shall not be eligible for, and shall not receive, a waiver or reduction of development standards other than density, parking, and height requirements.

4. A housing development in which units are for sale where at least 10% of the total dwelling units are reserved for persons and families of moderate income, provided that all units in the development are offered to the public for purchase, shall be eligible for a density bonus based on the percentage of moderate income units shown in the sliding scale provided in Government Code Section 65915(f)(4).

5. Density bonuses may also be granted for childcare facilities and land donation in excess of that required by Chapter 22.22 (Affordable Housing Regulations), pursuant to Government Code Sections 65915(g), 65915(h) and 65915(i).

Parking Standards

Pursuant to Government Code Section 65915(p), an applicant for a housing development project that is eligible for a density bonus pursuant to Section 22.24.020may request that on-site vehicular parking ratios, inclusive of accessible and guest parking not exceed the following standards:

1. For zero to one bedroom dwelling units: One on-site parking space
2. For two to three bedrooms dwelling units: Two on-site parking spaces
3. For four or more bedrooms dwelling units: 2.5 on-site parking spaces
4. On-site parking may include tandem and uncovered parking

Additional parking provisions for projects located near transit or consisting solely of rental units are outlined in the density bonus provisions of the Development Code.

Inclusionary Housing

Marin County has had an inclusionary housing requirement since 1980. Section 22.22.090 of the Development Code requires that residential subdivisions provide 20% of the total units or lots for lower income housing. A fee may be required in addition to inclusionary units or lots in cases where the inclusionary requirement includes a decimal fraction or a unit or lot or when a combination of both inclusionary units and in-lieu fees is required. Mixed-use developments proposing residential units are required to pay a Jobs/Housing linkage fee for the non-residential component. All inclusionary units must be income restricted in perpetuity. Units should be provided within the development, although the ordinance allows for flexibility; the review authority may grant a waiver if the alternative proposal demonstrates a better means of serving the County in achieving its affordable housing goals than the requirements. Waiver options may be units constructed off-site, real property may be dedicated, or 125% of the in-lieu fee may be paid. Further information about the in-lieu fee is provided in the Fees and Exactions section of this chapter

In response to the Governor's approval of AB 1505 (2017), which renewed the County's authority to extend its inclusionary zoning policy to rental housing units, the Board adopted an amendment to its Development Code to renew that application of its inclusionary zoning policy to the rental housing development projects.

To address potential constraints of an Inclusion Housing Policy on the development of new housing, the County and six partnering jurisdictions facilitated three developer forums. Two at the beginning of the study process, one with affordable housing developers and one with market-rate developers, to identify potential challenges to consider in the study process and one following the completion of the study to evaluate potential policy design. Input from the first two forums found that the inclusionary

programs have not resulted in significant production of new affordable units in part because of the complexity of residential development in the county. The policy constraints identified by developers include:

1. **Policy variation:** Each jurisdiction has a different policy, many jurisdictions do not have inclusionary policies.
2. **Affordability price targets vs. ranges:** Current policy relies on ranges with discretionary review.
3. **Breaks by project size:** many existing policies apply the same affordability levels and percentages on all projects. Housing development would benefit by tiering affordability by project size.
4. **For-sale policy:** Current policies set affordability levels too low and it is very difficult to find buyers who qualify for affordable units.
5. **Alignment with State Density Bonus**: many existing policies do not align with state density bonus, which adds additional challenges to navigate.

To address these constraints, the participating jurisdictions met and developed common policy elements. These elements include:

Homeowner housing -

- Consistent set-aside and in-lieu fee across jurisdictions
- Specific price targets based on AMI category
- Alignment and flexibility to comply with State Density Bonus law
- Varied inclusionary requirements based on project size

Rental housing -

- Consistent set-aside and in-lieu fee across jurisdictions
- Alignment and flexibility to comply with State Density Bonus law
- Developer selected menu of options for affordable rental housing

Commercial Linkage Fees

The Commercial Linkage Fee study includes a section compliant with AB 602 that addresses concerns and constraints around the existing level of service for facilities, proposed new levels of service, and explains why the new level of service is appropriate. The section includes support for an increase to the existing fee and assesses the assumptions of the former study.

Short-Term Rentals

The Marin County Board of Supervisors first adopted short term rental (STR) regulations in 2018, requiring operators to obtain both a Business License and Transient Occupancy Tax Certificate, and establishing "Good Neighbor" Policies to alleviate the impacts of Short-Term Rentals on surrounding communities. Currently, there are approximately 873 registered residential STRs, with over 70% of those located in West Marin. There are only 5,263 residentially developed properties in this area. Over 11% of the residentially developed properties are used as STRs in West Marin, while less than 1% of residentially developed properties are used as STRs in the eastern portion of the County. In addition, only 2,239 of the approximately 5,263 developed lots in the West Marin area receive the Primary Home Tax Exemption, indicating that over half of the developed properties in West Marin may not be in use as full-time homes. While all are not currently operating as STRs, the flexibility and the income generated by STRs, where nightly rates can range up to over $1,000/night, in comparison to that earned with a long-term rental is likely an incentive for property owners to seek STR use serving visitors rather than traditional rental housing for a community of residents. This condition has led to growing concerns in West Marin communities about impacts of STRs on the availability of housing for workforce, families, and community members.

With housing supply, community workforce, and public safety as motivators, the Board adopted a two-year moratorium, ending May 23, 2024, on new STRs in the West Marin Area (also known as the Measure W Tax Area). Over the next two years, County staff will work to update the County's Short Term Rental Ordinance to improve the availability of middle- and lower-income housing in the West Marin Area, while maintaining existing coastal access. These programs will not impact the development of residential development, instead they are preventing the conversion of residential uses to commercial uses.

Urban Growth Limits

The County does not have any Urban Growth Limits or growth control policies that place a numerical limit on housing development. Policies in the 2007 Countywide Plan which have been identified as possible barriers to residential development, especially multi-unit, are being deleted and or amended. Specifically, the County will:

- Revise the Housing Overlay District as a form-based code to streamline multifamily housing development.
- Provide for ministerial review of projects that meet the requirements of the form-based code and include 20% lower income.
- Provide for by-right zoning on sites identified in past housing elements that are designated for lower income housing.

- Amend the Countywide Plan and Zoning Code to increase densities on opportunity sites identified in the Housing Element and for low income sites have a minimum of 20 units per acre.

Provision for a Variety of Housing Types

Development opportunities for a variety of housing types promote diversity in housing price, designs, and sizes, and contribute to neighborhood stability. Marin County's Development Code accommodates a variety of housing types, including single-unit, two-units and multi-units, accessory dwelling units, single room occupancy, manufactured housing, supportive housing, housing for agricultural workers, transitional housing, and emergency shelters. Table H-3.18 through Table H-3.20 show which housing types are permitted in the different residential, commercial, and agricultural zones. These uses are all discussed below.

Table H-3.18: Use Regulations in Residential Districts

Uses	RA	C-RA	RR	RE	R1	C-R1	RSP	C-RSP	R2	C-R2	RMP	C-RMP	RX	RF
Single-family Dwellings	P	P	P	P	P	P	P	P	P	P	P	P	---	P
Two Family Dwellings	---	---	---	---	---	---	---	---	P	P	P	P	---	---
Multi-family Dwellings	---	---	---	---	---	---	---	---	---	---	P	P	---	---
Accessory Dwelling Units/Junior Accessory Dwelling Units	P	P	P	P	P	P	P	P	P	P	P	P	P	P
Agricultural Worker Housing	---	---	---	---	---	---	---	---	---	---	---	---	---	---
Mobile Home Park	---	---	---	---	---	---	---	---	U	---	U	---	P	---
Group Homes (6 or fewer)	P	P	P	P	P	P	P	P	P	P	P	P	P	P
Group Homes (7 or more)	U	U	U	U	U	U	U	U	U	U	U	U	U	U
Medical Services – Extended Care	U		U	U	U		U		U		U		---	---
Residential Care Facilities	P		P	P	P		P		P		P		P	P
Single Room Occupancy (SRO)	---		---	---	---		---		---		P		---	---
Transitional and Supportive Housing	P		P	P	P		P		P		P		P	P
Emergency Shelters	---		---	---	---		---		---		---		---	---

Source: Marin County Municipal Code, 2021.

Notes: "P" means principally permitted, "U" means conditionally permitted subject to Use Permit approval, "---" means prohibited.

Table H-3.19: Use Regulations in Commercial/Mixed Use Districts

Uses	VCR	C-VCR	RMPC	C-RMPC	C1	CP	C-CP	AP	OP	H1	C-H1	RCR	C-RCR	IP
Single-family Dwellings	P	P	P	P (MP)	P(1,2)	P(2)	MP	P(2)	P	P(2)	U	U	MP	---
Two Family Dwellings	U	U	P	P (MP)	P(1,2)	---	MP	P(2)	P	P(2)	U	U	MP	---
Multi-family Dwellings	U	U	P	P (MP)	P(2)	P(2)	MP	P(2)	P	P(2)	U	U	MP	---
Accessory Dwelling Units/Junior Accessory Dwelling Units	P	P	P	P	P	P	P	P	P	P	U	P	P	---
Agricultural Worker Housing	---	---	---	---	---	---	---	---	---	---	---	---	---	---
Mobile Home Park	---	---	---	---	---	---	MP	------	---	---	---	---	MP	---
Group Homes (6 or fewer)	P		P		---	---		---	P	U		---		---
Group Homes (7 or more)	U		U		---	---		---	U	U		---		---
Medical Services – Extended Care	U		U		U	P		---	P	U		---		---
Residential Care Facilities	P		P		---	P		---	P	U		---		---
Single Room Occupancy (SRO)	---		P		---	---	MP	P	P	P		---	MP	---
Transitional and Supportive Housing	P		P		P	P		P	P	P		P		U
Emergency Shelters	---	---	---	---	P	P	---	---	---	---	---	---	---	---

Source: Marin County Municipal Code, 2021.

Notes: "P" means principally permitted, "U" means conditionally permitted subject to Use Permit approval, MU and MP means Master Plan approval "---" means prohibited

[1] Dwellings allowed above the first floor only. First floor shall be reserved for non-residential use.

[2] Dwellings, except for affordable housing, shall be accessory to the primary commercial use.

Table H-3.20: Use Regulations in Agricultural and Special Purpose Districts

Uses	A2	A3 to A60	ARP	C-APR	OA	C-OA	PF
Single-family Dwellings	P	P	P	P	U(1)	---	P(2)
Two Family Dwellings	---	---	---	---	U(1)	---	P(2)
Multi-family Dwellings	---	---	---	---	U(1)	---	P(2)
Accessory Dwelling Units/Junior Accessory Dwelling Units	P	P	P	P	P	---	P
Agricultural Worker Housing (up to 12 employees)	P	P	P	P	P	P	---
Mobile Homes	---	---	---	---	---	---	---
Group Homes (6 or fewer)	P	P	P		---		---
Group Homes (7 or more)	U	U	U		---		---
Medical Services – Extended Care	U	U	U		---		---
Residential Care Facilities	P	P	P		---		---
Single Room Occupancy (SRO)	---	---	---		---		---
Transitional and Supportive Housing	P	U	P		---		U
Emergency Shelters	---	---	---	---	---	---	---

Source: Marin County Municipal Code, 2021.

Notes: "P" means principally permitted, "U" means conditionally permitted subject to Use Permit approval, MU and MP means Master Plan approval "---" means prohibited

(1) Only dwellings for teachers or custodial staff, or dwellings clearly accessory to the primary use of the site for agricultural purposes are allowed.

(2) Housing is permitted in combined districts that allow housing, such as PF-RSP, PF-RMP, and PF-ARP. Single-family, two-family, and multi-family dwellings are principally permitted only on the Countywide Plan's Housing Overlay Designation sites.

Single-family Dwelling Units

Single-family residential uses are permitted in all residential zones, with the exception of the mobile home park zone (RX). Single-family uses are permitted or conditionally permitted in most of the mixed-use/commercial and agricultural zones. According to the Marin County Community Development Agency's 2020 *Multi-Family Land Use Policy and Zoning Study*, approximately 72% of parcels in the unincorporated County are zoned with a primary single-family zoning type. To promote the development of needed multi-family development in the County, this Element proposes the following program:

Efficient Use of Multi-Family Land: Establish density minimums. This will ensure efficient use of the County's multi-family land and prohibit the construction of new single-family homes on multi-family land. Existing single-family homes on multi-family land can remain (as legal nonconforming use). However, rebuilding or expansion of the existing single-family home would only be permitted if the expansion does not exceed more than 25% of the value of the home or rebuilding due to damage sustained during disasters or fires.

Multi-Family Dwellings

Multi-family dwellings as the primary use are permitted in the RMP and C-RMP zones. Two-family dwellings are also permitted in the R2 and C-R2 zoning categories. As described in the County's Multi-Family Land Use Policy and Zoning Study, "the number of properties zoned to allow duplex (two-family), multi-family, or mixed business/institutional land uses are significantly less than the number of properties that allow for single-family use." The study found that only 10% of parcels in the unincorporated area are zoned for primarily multi-family uses and less than one percent are zoned for two-family dwellings. As part of this Housing Element update, the County has identified areas to rezone for multi-family residential uses. Please refer to the Conventional Zoning section earlier in this chapter regarding programs proposed in this Element regarding multi-family housing.

While increasing residential densities in some locations may be feasible, several environmental and infrastructure constraints may make this a challenge in other areas. The infrastructure section of this chapter looks at potential constraints and potential ways to help continue to permit affordable housing in the unincorporated County.

Commercial/Mixed-Use Development

As shown in Table H-3.19, a variety of mixed-use zoning designations allows for different housing options, including multi-family housing, in the business areas. The residential uses are allowed with a conditional use permit or part of a planned development. Projects allowed by-right included as part of this Housing Element will be subject to the new ODDS.

Accessory Dwelling Units/Junior Accessory Dwelling Units

Accessory Dwelling Units (ADUs) are independent housing units that are either detached or attached to an existing single-family residence. Due to their relatively small size and location on currently developed property, they may be affordable by design. ADUs can provide housing options for family members, seniors, students, and other small household types.

The State legislature has passed a series of bills aimed at encouraging the development of ADUs. These bills have required jurisdictions to adopt regulations to facilitate their production and streamline their approval. Marin County has adopted Development Code amendments to comply with State law, with the most recent ordinance (No. 3745) being adopted by the Board of Supervisors in January 2021. This ordinance established four categories of ADUs, each with different standards. The following provisions apply to all four categories:

- Only one ADU is allowed on a lot restricted to single-family residential development.
- An ADU may be rented but shall not be sold or otherwise conveyed separately form the primary dwelling unit.
- ADUs can only be rented for terms longer than 30 consecutive days.
- Parking standards: 1 space for a studio or one-bedroom unit and 2 spaces for a two- or more bedroom unit.

The Development Code includes provisions for Junior ADUs (JADUs), which are defined as units no larger than 500 square feet. JADUs may have a kitchenette but not a full kitchen, and there must be a separate entrance from the main entrance to the building. No minimum parking spaces are required for JADUs.

ADUs are allowable in any zoning district where primary residences are allowable. No discretionary review of ADUs or JADUs are required outside of the coastal zone. There are four categories of ADUs in unincorporated Marin County, each with different standards that apply. Category 4 ADUs are ADUs that require coastal permits and compliance with all applicable zoning requirements including Master Plan criteria and discretionary review. Categories 2 and 3 do not require discretionary review but do require an ADU permit. When creating an ADU in the coastal zone requires a Coastal Permit, it can usually be issued administratively with no public hearing. However, if the project involves unrelated development that independently requires a Coastal Permit or a change from an agricultural or commercial use to a residential ADU, then a public hearing will be required.

Marin County has seen an increase in ADU development in recent years. Since 2018, the County has issued 119 building permits for ADUs:

- 2018 – 15 building permits issued
- 2019 – 37 building permits issued
- 2020 – 32 building permits issued
- 2021 – 35 building permits issued

On May 25, 2021, the Board of Supervisors approved an extension to the Accessory Dwelling Unit Fee Waiver Program, which offers property owners fee waivers for the development of ADUs in unincorporated Marin County. This program offers a tiered fee waiver structure to support the development of additional affordable rental housing stock by further incentivizing the development of second units that are rented to low and moderate income households. The waiver program is in place through December 31, 2023. The fees waived may include Community Development Agency fees such as planning, building and safety, and environmental health services, and Department of Public Works fees such as traffic mitigation. Additional information about the waiver program is available on the County's website.

As part of the SB2 grant program, a partnership was established between ten cities and towns and the County called "ADU Marin". This partnership aims to promote the development of ADUs and includes a variety of information sources on the County website (https://adumarin.org), including interactive workbooks and webinars to assist interested property owners through all aspects of the ADU process.

This Housing Element includes a program to facilitate the development of ADUs and monitor the trend of development.

Agricultural Worker and Employee Housing

As discussed in the Needs Assessment chapter of this element, Marin County's agricultural history remains a strong value and source of pride, particularly in the Coastal and Inland Rural Corridors. According to the United States Department of Agriculture (USDA), Marin County farms and ranches encompass approximately 140,075 acres, or about 41% of the County's total land area; land in farms decreased by 18% from 2012 to 2017.[10] Rural west Marin has an economic base of cattle ranches, dairies, organic vegetable farms, poultry, mariculture, and tourism. Of the 343 agricultural operations in Marin County, the majority are third- to fifth-generation family-

[10] 2017 Census of Agriculture Marin County Profile,

owned farms and are not large by California standards, with an average size of 408 acres.

Agricultural workers are significantly impacted by the high cost of living in Marin County, especially housing costs that are influenced by vacation rentals and high-end tourism. To promote a vibrant and economically sound agriculture base as part of Marin County's future, quality affordable housing for agricultural workers and their families is needed.

Almost all agriculturally zoned land in Marin County is located within unincorporated County areas, so presumably the data available on the agricultural worker population in the County are representative of the unincorporated County. The 2017 USDA Census reported that in Marin County, 1,274 persons were hired farmworkers, which accounts for less than one percent of the Marin County workforce.[11]

Distinct from other agricultural regions of the State, much of the County's agricultural production primarily requires a year-round, permanent workforce. As a result, the County does not experience a significant influx of seasonal workers during peak harvest times.

As stated in the Development Code, agricultural worker housing providing accommodations for 12 or fewer employees is considered a principally permitted agricultural land use in the following zoning districts: A2, A3 to A60, ARP, C-ARP, O-A, and C-OA, and are allowed by Articles II (Zoning Districts and Allowable Land Uses) and V (Coastal Zone Development and Resource Management Standards). Any temporary mobile home not on a permanent foundation and used as living quarters for seven to 12 agricultural workers is permitted subject to the requirements of the State Department of Housing and Community Development. Any temporary mobile home providing living quarters for six or fewer agricultural workers requires Use Permit approval and is counted as one dwelling unit for purposes of compliance with the zoning district's density limitations. These provisions are not consistent with the State Employee Housing Act (Section 17021.6 of the Health and Safety Code), which specifies the following:

> "Any employee housing consisting of no more than 36 beds in a group quarter or 12 units or spaces designed for use by a single family or household shall be deemed an agricultural land use for the purposes of this section. For the purpose of all local ordinances, employee housing shall not be deemed a use that implies that the employee housing is an activity that differs in any other way from an agricultural use. No conditional use permit, zoning variance, or other zoning clearance shall be required of this employee housing that is not required of any other agricultural activity in the same zone. The permitted occupancy in employee

[11] Civilian employed population 16 years and over. American Community Survey Five-Year Estimates, 2015-2019. Table S2403.

> housing in a zone allowing agricultural uses shall include agricultural employees who do not work on the property where the employee housing is located."

The Employee Housing Act also requires that employee housing serving six or fewer workers must be treated like a dwelling serving one family or household and permitted in all zones that permit residences. Zones permitting residences must also permit employee housing serving up to six employees.

This Housing Element Plan chapter includes a program for the County to develop strategies for addressing farmworker housing. The County will amend the Development Code to comply with the State Employee Housing Act for agricultural workers and employees.

The County acquired the U.S. Coast Guard Facility in the fall of 2019. Located in Point Reyes Station, the 32-acre site contains 36 multi-bedroom housing units and other community facilities. The renovation of the site will be accomplished by two nonprofit housing agencies, the Community Land Trust Association of West Marin and Eden Housing. The project will convert the existing housing to affordable housing, including housing for agricultural workers and their families.

In 2020, CDA staff began exploring the possible development of Agricultural Worker Housing on a County-owned site in Nicasio. As of early 2022, a Phase I study and biological assessment had been conducted to help determine suitability for a 16-unit lower income residential development.

CDA staff convenes the Agricultural Worker Housing Collaborative, including the Marin Community Foundation, the Community Land Trust of West Marin, Marin Agricultural Land Trust, UC Cooperative Extension, West Marin Community Services, local ranchers, and ranch workers to address the needs of agricultural worker housing. The Agricultural Worker Housing Collaborate is expanding to include agricultural workers and their families, as well as representatives of the Park Service, the collaborative will continue its work to expand housing choices and quality of, housing for agricultural workers and their families.

See "Housing in the Coastal Zone" for additional information on agricultural worker housing.

Mobile Home Parks and Manufactured Homes

Mobile homes make up approximately 2% of the housing stock in County areas. The Residential, Mobile Home Park (RX) zoning designation permits mobile homes and mobile home parks. Both mobile homes and mobile home parks can be part of a master plan in the C-CP and C-RCR zones. Mobile home parks are conditionally permitted in the R2, RMP, and C-ARP zones. Three mobile home parks exist in unincorporated Marin

County as of 2022: Dillon Beach Resort Trailer Court (25 units)[12], Novato RV Park (82 units) and Forest Knolls Trailer Courts (20 units).

Manufactured homes installed on permanent foundation and meeting State standards are considered single-family homes and permitted as single-family uses.

Group Homes (Six or Fewer and Seven or more residents), Medical Services – Extended Care and Residential Care Facilities

The following definitions are from the Marin County Development Code:

Group Homes:

This land use consists of a dwelling unit licensed or supervised by any Federal, State, or local health/welfare agency which provides 24-hour nonmedical care of unrelated persons who are in need of personal services, supervision, or assistance essential for sustaining the activities of daily living or for the protection of the individual in a family-like environment. Includes: children's homes; rehabilitation centers; self-help group homes. Medical care may be provided in conjunction with group homes that provide alcoholism or drug abuse recovery or treatment services. Convalescent homes, nursing homes and similar facilities providing medical care are included under the definition of "Medical Services - Extended Care."

Medical services – Extended Care:

This land use consists of the provision of nursing and health-related care as a principal use, with in-patient beds. This land use includes: convalescent and rest homes; extended care facilities; and skilled nursing facilities that are licensed or supervised by any Federal, State, or local health/welfare agency. Long-term personal care facilities that do not emphasize medical treatment are included under "Residential Care Facilities," and "Group Homes."

Residential care facility:

This land use consists of a dwelling unit licensed or supervised by any Federal, State, or local health/welfare agency which provides 24-hour nonmedical care of unrelated persons who are disabled and in need of personal services, supervision, or assistance essential for sustaining the activities of daily living or for the protection of the individual in a family-like environment. This land use includes licensed senior care facilities. For purposes of calculating residential densities, a unit that contains a food preparation area is not counted as a separate residential unit if meal service is provided at least twice a day as part of the residential care component.

[12] These units are not permanent housing units. They are used as nightly hotel rooms.

Small group homes (six or fewer residents) and residential care facilities are permitted in all residential zones. Large group homes (seven or more residents) may apply for a conditional use permit in all residential zoning districts including in the coastal area of these zones. The 2023-2031 Housing Element includes a program to evaluate the CUP findings required for large group residential care facilities, and to amend the provisions if found to be a constraint.

According to the California Department of Social Services (CDSS) website, one adult residential facility is licensed in the unincorporated County. Cedars of Marin in Ross provides residential and day programs for people with developmental disabilities. The facility is licensed for 55 beds. In terms of assisted living facilities, the unincorporated County has one small and two large facilities, including Windchime of Marin in Kentfield. This 55-bed facility serves those with dementia or related illnesses. Lastly, the Tamalpais Retirement Community located in Greenbrae is a 341-person continuing care retirement community. It should be noted that the CDSS website has many more licensed residential care and assisted living facilities located in incorporated cities within Marin County.

Single Room Occupancy (SRO)

Single room occupancy units are typically small one-room units that may have shared kitchen or bathroom facilities. In Marin County, SROs are permitted in the RMP residential zone district as well as the following commercial/mixed-use districts: RMPC, AP, OP, and H1. In the C-CP and C-RCR zones, SROs are permitted when part of a master plan. Design review is required for an SRO permit and SROs are also subject to the Multi Family Design Guidelines. Per the Development Code, the density for SROs may be no more than 30 dwelling units per acre, and all rents must be affordable to households with income qualifying as low, very low, or extremely low income (Marin County Development Code Chapter 22.22 and 22.24).

Transitional and Supportive Housing

Transitional housing is a type of supportive housing used to facilitate the movement of individuals and families experiencing homelessness to permanent housing. Typically, supportive housing is permanent housing linked with social services. Marin County treats transitional and supportive housing in the same manner as any other residential use and does not require supportive and transitional housing to obtain any additional types of permits and approvals other than those required of any other residential development. Residential uses, including transitional and supportive housing, are permitted in the following zones: Agricultural and Resource-Related Districts, Single-Family Districts, Multi-Family Districts, Commercial Districts and Planned Office Districts. However, transitional and supportive housing is not specifically identified in the coastal

area of these zones (C-RA, C-R1, C-R2, C-RSP, C-RMP, C-VCR, C-RMPC, C-CP, C-RCR, and C-APR). This Housing Element includes an action to allow transitional and supportive housing in the Coastal Zone.

In accordance with State law (Chapter 633 of Statutes 2007, SB 2), transitional and supportive housing are considered residential uses of property and are subject only to those restrictions that apply to other residential dwellings of the same type in the same zone. In 2018, the State legislature adopted new requirements (AB 2162) which mandate jurisdictions to permit supportive housing developments of 50 units or fewer, meeting certain requirements, by right in zones where mixed-use and multi-family development is permitted. Additionally, parking requirements are prohibited for supportive housing developments within one half mile of a transit stop. The County will comply with state law in reviewing any proposed facility and will amend the Development Code in compliance with these provisions.

Emergency Shelters and Low Barrier Navigation Centers

An emergency shelter is a facility that provides shelter to homeless families and/or individuals on a limited short-term basis. In accordance with SB2 (2007), Marin County amended the Development Code in 2012 to 1) accommodate the permitting of emergency homeless shelters within Planned Commercial (CP) and Retail Business (C1) districts and 2) establish standards in Section 22.32.095 to allow the approval of homeless shelters as a use through a ministerial action by the Agency Director. C1 and CP zones also permit affordable housing, as well as transitional and supportive housing.

Shelters are subject to the same development and management standards as other residential or commercial uses within the zone.

The following are current standards in Section 22.32.095 of the Development Code:

1. A homeless shelter shall not provide more than a maximum of 40 beds or serve more than 40 persons total.
2. The number of parking spaces required on-site for residents shall be based on 25% of the total beds and staff parking shall be the total number of beds divided by ten.
3. Shelters shall provide five square feet of interior waiting and client intake space per bed. Waiting and intake areas may be used for other purposes as needed during operations of the shelter.
4. Management. On-site management must be provided during hours of operation.
5. Proximity to other emergency shelters. Emergency shelters shall be at least 300 feet apart, but will not be required to be more than 300 feet apart.

6. Maximum length of stay. Maximum of six months.

AB 139, adopted by the State legislature in 2019, limits the standards that local jurisdictions may apply to emergency shelters. Per AB 139, cities and counties may set forth standards regulating: the maximum number of beds; the size and location of onsite waiting and intake areas; the provision of onsite management; proximity to other emergency shelters, provided that shelters are not required to be more than 300 feet apart; length of stay; lighting; and security during hours of operation. Additionally, a city or county may only require off-street parking to accommodate shelter staff, provided that these standards do not require more parking than what is required for other residential or commercial uses in the same zone. The Housing Element Development Code amendment program will review the emergency shelter provisions to ensure they are consistent with these provisions. Parking standards are part of the Municipal Code Title 24 and will need to be amended separately.

The 2019 Point-in-Time Count of the homeless population estimated that 172 unsheltered homeless are residing in the unincorporated areas. Based on the County's maximum shelter size (40 beds), a minimum of five shelters will be required to accommodate the unsheltered homeless population. Overall, 122 parcels in the unincorporated areas comprise about 98 acres of land designated for Planned Commercial (CP) and Retail Business (C1) uses. Within the CP zoning district, the average lot size is 0.80 acre. A land use analysis found that CP is the most feasible district given the adjacent uses, proximity to transit, general location, and status of available land. Specifically, the majority of the CP zoned properties are located along transportation corridors (such as Highway 101 and Tiburon Boulevard) in urbanized areas of the unincorporated county. There is realistic potential for redevelopment or reuse within the C1 and CP zones as there are both vacant and underutilized parcels. There are 20 vacant parcels (three parcels in C1 and 17 parcels in CP zone). The vacant C1 properties total 0.9 acre, ranging in size from 0.18 acre to 0.44 acre. To accommodate 172 unhoused persons, at approximately 200 square feet per person, as a standard established in AB 2339, a total of 0.8 acre is required. The 20 vacant parcels available total approximately 4 acres, and, except for the 0.1 acre that may be too small to accommodate a shelter, all vacant properties are of reasonable size for shelter development. They are also located in areas that are suitable for residential use. Specifically, 13 of the vacant parcels are on lots adjoining existing residential areas and six are in commercial areas. In addition to the 20 vacant parcels, six parcels in the CP zone are developed as single-family residential use that may be considered underutilized. Redevelopment of these underutilized parcels or adaptive reuse of these homes can be potential strategies for shelter accommodation. Furthermore, located within the CP zone is also a concentration of county services such as the Veterans Service Office and Community Violence Solutions. Also adopted in 2019, AB 101

(Government Code Sections 65660 et seq.) requires counties to permit Low Barrier Navigation Centers by right in areas zoned for mixed-use and nonresidential zones that permit multi-family uses if the center meets certain requirements. AB 101 defines a Low Barrier Navigation Center as "a Housing First, low-barrier, service-enriched shelter focused on moving people into permanent housing that provides temporary living facilities while case managers connect individuals experiencing homelessness to income, public benefits, health services, shelter, and housing." AB 101 is effective through the end of 2026, at which point its provisions may be repealed. This Housing Element includes a program to update the County's Development Code to comply with AB 101. The County has taken several steps to implement a "housing first" approach to homelessness. Marin County has partnered with Homeward Bound of Marin and the Marin Community Foundation to transform the Mill Street Emergency Shelter in San Rafael into a Housing-Focused Shelter. This includes hiring a new housing-focused case manager to help all clients with individual housing plans. The Housing and Federal Grants Division participates as a voting member in bimonthly Homeless Policy Steering Committee (HPSC) meetings. Staff also participate in Opening Doors, an organization with a focus on solving chronic homelessness. In 2020, local match funds of $2,395,000 were used to leverage $9,214,948 in State Homekey 1.0 funding to acquire a former motel and commercial building to create 63 units of interim housing which will be converted to permanent supportive housing with wraparound services earmarked for individual who have recently experienced homelessness. The County is partnering with Episcopal Community Services (ECS) for Project Homekey 2.0. The potential site, located at 1251 S. Eliseo in the City of Larkspur, is a former skilled nursing facility that could create 43 to 50 new permanent homes with wraparound supportive services. The Project Homekey 2.0 funds were awarded by the State on February 10, 2022. The Marin Homeless Outreach Team (HOT) is an effort of local public and non-profit entities to assist those in greatest need to access permanent housing. HOT has two parts: case management and case conferencing. Case conferencing is a biweekly meeting of HOT partners to address system barriers preventing clients from accessing permanent housing. The Marin County website has information, resources and contact related to homeless services.

Housing in the Coastal Zone

In August 2021, the County's LCP was updated to include many new and improved policies and code provisions. The following policies were adopted as part of the LCP update to address affordable housing within the coastal zone:

Policy C-HS-1 Protection of Existing Affordable Housing.

Continue to protect and provide affordable housing opportunities for very low, low, and moderate income households. Prohibit demolition of existing deed restricted very low, low, and moderate income housing except when:

1. Demolition is necessary for health and safety reasons; or
2. Costs of rehabilitation would be prohibitively expensive and impact affordability of homes for very low, low, and moderate income households; and
3. Units to be demolished are replaced on a one-for-one basis with units of comparable rental value on site or within the immediate Coastal Zone area.

Policy C-HS-2 Density for Affordable Housing.

Allow the maximum range of density for deed-restricted housing developments that are affordable to extremely low, very low, or low income households and that have access to adequate water and sewer services.

Policy C-HS-3 Affordable Housing Requirement.

Require residential developments in the Coastal Zone consisting of two or more units to provide 20% of the total number of units to be affordable by households of very low or low income or a proportional “in-lieu” fee to increase affordable housing construction.

Policy C-HS-4 Retention of Small Lot Zoning.

Preserve small lot zoning (6,000 – 10,000 square feet) in Tomales, Point Reyes Station, and Olema for the purposes of providing housing opportunities at less expense than available in large-lot zones.

Policy C-HS-5 Second Units.

Consistent with the requirements of California Government Code Section 65852.2 and this LCP, continue to enable construction of well-designed second units in both new and existing residential neighborhoods as an important way to provide workforce and special needs housing. Ensure that adequate services and resources, such as water supply and sewage disposal, are available consistent with Policy C-PFS-1 Adequate Services.

Policy C-HS-6 Regulate Short-Term Rental of Primary or Second Units.

Regulate the use of residential housing for short term vacation rentals.

Program C-HS-6.a Vacation Rental Ordinance

1. Work with community groups to develop an ordinance regulating short-term vacation rentals.
2. Research and report to the Board of Supervisors on the feasibility of such an ordinance, options for enforcement, estimated program cost to the County, and the legal framework associated with rental properties.

Policy C-HS-7 Williamson Act Modifications to the Development Code.

Allow farm owners in a designated agricultural preserve to subdivide up to 5 acres of the preserved land for sale or lease to a nonprofit organization, a city, a county, a housing authority, or a state agency in order to facilitate the development and provision of agricultural worker housing. Section 51230.2 of the Williamson Act requires that the parcel to be sold or leased must be contiguous to one or more parcels that allow residential uses and developed with existing residential, commercial, or industrial uses. The parcel to be sold or leased shall be subject to a deed restriction that limits the use of the parcel to agricultural laborer housing facilities for not less than 30 years. That deed restriction shall also require that parcel to be merged with the parcel from which it was subdivided when the parcel ceases to be used for agricultural laborer housing.

Policy C-HS-8 Development of Agricultural Worker Housing Units in Agricultural Zones.

Support policy changes that promote development of agricultural worker units in agricultural zones.

Program C-HS-8.a Administrative Review for Agricultural Worker Housing Units.

Establish an administrative Coastal Permit review process for applications for agricultural worker units in order to expedite the permitting process and facilitate development of legal agricultural worker units.

Policy C-HS-9 Density Bonuses.

Provide density bonuses for affordable housing in the Coastal Zone consistent with Government Code Section 65915 and Coastal Act Section 30604(f), to the extent that such increases in density are consistent with the provisions of the LCP.

Processing and Development Permit Procedures

Types of Planning Applications

Marin County's planning permit review process includes three categories of applications: ministerial projects, projects subject to administrative or quasi-judicial approvals, and projects that require legislative action.

Ministerial Actions

Ministerial actions are taken by planning and building and safety division staff for projects that involve the imposition of predetermined and objective criteria. Ministerial actions taken by planning staff include approvals of accessory dwelling units, daycare facilities, and homeless shelters. Ministerial actions also apply to projects that are eligible for review under SB 35 (Gov't Code Section 65913.4) and SB 9 (Gov't Code §§

65852.21 and 66411.7) provisions.[13] Building and safety division staff issue building permits. Ministerial actions are by far the most common type of decision made by the County and are a routine part of development throughout the State. Ministerial actions are the most cost-effective means for regulating land use and development at the County's disposal and provide developers with high levels of certainty because the standards applied are clear and objective. Ministerial permits are not subject to CEQA or to appeal.

Administrative (Quasi-Judicial) Actions

Administrative, or quasi-judicial, actions are decisions on planning permits that involve the application of preexisting laws and standards to a specific project and may be taken by planning staff, the Planning Commission, or the Board of Supervisors. Discretionary planning permits are far more common than legislative actions and are required for projects that vary considerably in their size and complexity. Permit processing requires an evaluation of an application based on substantial evidence in the record and approvals can only be issued for projects that meet predetermined findings related to the County's policies, regulations, and guidelines. Under the Housing Accountability Act, if a housing development project complies with all objective standards, it may only be denied or the density reduced if the project would cause a "specific, adverse impact," based on adopted health and safety standards, that cannot be mitigated. For certain types of applications, including use permits and tentative maps, public hearings are required by State law. Provided an application is categorically exempt from CEQA, a decision will be issued within three months of the date that a complete application is submitted. If environmental review is required for the project, a negative declaration will normally take an additional six months and an environmental impact report (EIR) will normally take an additional year. Quasi-judicial planning permits may be appealed to the Planning Commission and subsequently to the Board of Supervisors.

Legislative Actions

Legislative actions are actions that involve adoption of generally applicable laws or basic policies. These actions are made by the Board of Supervisors. Legislative actions are usually initiated to achieve long-term planning goals, and the process for their approval is commensurately complex and time consuming. Legislative actions are subject to CEQA. In Marin County, legislative actions include general plan, community plan, and

[13] SB 35 - Marin County is subject to e subject to the streamlined ministerial approval process (Chapter 366, Statutes of 2017) streamlining) for proposed developments with at least 50% affordability. The proposed development must be on an infill site and comply with existing residential and mixed use zoning. *Source:* www.hcd.ca.gov
Senate Bill (SB) 9 (Chapter 162, Statutes of 2021) requires ministerial approval of a housing development with no more than two primary units in a single-family zone, the subdivision of a parcel in a single-family zone into two parcels, or both. SB 9 facilitates the creation of up to four housing units in the lot area typically used for one single-family home. SB 9 contains eligibility criteria addressing environmental site constraints (e.g., wetlands, wildfire risk, etc.) *Source:* www.hcd.ca.gov

code amendments and adoption of master plans. As part of the implementation of the Housing Element, the County will adopt the zoning required to permit development on designated housing sites, so that no legislative approvals should be required for housing consistent with the Housing Element.

Coastal Permits

For properties within the Coastal Zone, a Coastal Development Permit is required. This discretionary permit is subject to standards certified by the California Coastal Commission in Marin County's LCP. Coastal permits are unusual in that they regulate both development and use, even when a particular use is principally permitted within a given zoning district. For this reason, very few projects are exempt from discretionary review in the Coastal Zone. Risks, costs, and delays associated with the coastal permit process are further increased because most coastal permit approvals are appealable to the California Coastal Commission, except for principally permitted uses outside of a geographic appeal jurisdiction. Affordable housing projects are not exempt from coastal permit requirements. However, LCP amendments fully certified in February 2019 establish affordable housing as a principally permitted use in coastal residential and commercial/mixed-use districts. This means a coastal permit approval for an affordable housing project in one of these districts would only be subject to appeal to the Coastal Commission if proposed within the Commission's geographic appeal area.

Planning Application Assistance

The County's Planning Division provides a variety of options to help applicants through the process. These steps are highly encouraged and are outlined in the County's Planning Application Guide, which was developed in 2017 and is available on the County's website.

Property Information Packet

A Property Information Packet (PIP) is a summary of a property's permit history. The PIP provides an applicant with copies of all final decisions and exhibits for planning applications that have been submitted for the property in the past. Also included is some basic planning information and an aerial photo of the site.

Planning Consultation

A Planning Consultation application covers two hours of time spent by a planner to answer questions. They are useful for a number of different purposes, including general questions about the planning process or particular policies. The most common reason people apply for consultations is to get an early idea of what planning considerations may affect their project. In these types of consultations, a planner will identify the policy and regulatory documents that will apply to the project, check County maps for background information, and meet with an applicant to go over the project. The planner

will let the applicant know what planning documents to review, indicate whether environmental review is likely, and suggest what the path of least resistance may be for the applicant to consider.

Another common reason people request a consultation is because they have obtained a planning permit for development but want to make changes to the design during building permit review. A consultation is an opportunity for applicants to ask a planner whether the changes they want to make would substantially conform to the approved planning permit.

Preapplication

Pre-applications are much more in depth than consultations and are typically reserved for larger-scale projects. While the services provided are to some degree up to the applicant, a Preapplication review would usually include transmitting a proposal to other departments and organizations and collecting their comments, as well as a report on what staff has found in their research. Typically, the report will focus on policies and regulations that may affect the project, application and submittal requirements, and environmental review. This service is useful because it provides direct written feedback to a specific project, and general information about the regulatory process and development standards applicable to the property.

Presubmittal Plan Review

A Presubmittal Plan Review entails a cursory review of the plans for a project before an official planning application is submitted. A planner reviews the application materials to determine if they meet the basic submittal requirements.

Design Review

Design Review applies to all new structures and exterior physical improvements, as well as additions, extensions, and exterior changes of or to existing structures and/or relocation of physical improvements, for either a single or multiple contiguous lots. Design Review is a discretionary administrative process, and the Agency Director, or designee, makes a discretionary decision, which is appealable to the Planning Commission, whose discussion in turn is appealable to the Board of Supervisors. The Marin County Code, however, also allows the Agency Director to refer an appeal directly to the Board of Supervisors if necessary to comply with State or Federal law or otherwise consistent with applicable development standards. The findings to approve a project are subjective and require interpretation.

Review Process

Completeness Review: The first step in the formal application process is reviewing the application materials submitted to determine if the submission is adequate to fully review

the project. This process is governed by the Permit Streamlining Act (PSA). If the application is not complete, the applicant is informed within 30 days of submittal those items of information that are still necessary. The applicant is given 30 days to resubmit, but may be granted extension upon request to gather all the necessary information.

The completeness review sometimes involves the planner transmitting the project materials to a number of agencies and organizations that have purview over or an interest in development. These usually include: (1) the Department of Public Works; (2) the local fire department; (3) the local water district (or the Environmental Health Services Division, if the property is on well water); (4) the local sanitary district (or the Environmental Health Services Division, if the property is on septic); and, (5) design review boards, if located in an area where a Design Review Board reviews development projects *(see more on this below).* In some rare instances, a planner may also transmit a project to State agencies, such as the California Coastal Commission, the Department of Fish and Wildlife, or federal agencies such as the Army Corps of Engineers.

Design Review Boards: Design Review Boards are citizen advisory committees and act as liaisons to the Board of Supervisors, the Planning Commission, the Planning Division, and the local community. They are made up of volunteers from the local community who are appointed by the Board of Supervisors. They hold public meetings where applicants for development projects are invited to present their proposals. While Design Review Boards do not issue decisions on projects, they do make recommendations to the County on each proposal they review. There are three design review boards:

- Kentfield Planning Advisory Board: The Kentfield Planning Advisory Board reviews projects within the area of Kentfield and Greenbrae covered by the Kentfield/Greenbrae Community Plan, with the exception of the Kent Woodlands neighborhood.
- Strawberry Design Review Board: The Strawberry Design Review Board reviews projects in the area covered by the Strawberry Community Plan, in the Strawberry area of Mill Valley.
- Tamalpais Design Review Board: The Tamalpais Design Review Board reviews projects in the area covered by the Tamalpais Valley Community Plan, in the Tamalpais area of Mill Valley.

Projects outside of these geographical areas are not subject to a publicly held design review hearing, unless an action of the Agency is appealed to the Planning Commission.

Coastal Zones: All development projects are subject to a Coastal Development Permit and a Design Review is often required. There are two types of Coastal Permit. Administrative Coastal Permits typically involve additions, minor developments etc. A decision to approve or deny is made by Agency Director or designee. A Coastal

Development Permit is subject to a public hearing and decision is entered by a Deputy Zoning Administrator. A Coastal Development Permit is a discretionary application and is processed in accordance with the description above.

Decisions made by the Director or Zoning Administrator may be appealed to the Planning Commission, and decisions made by the Planning Commission may be appealed to the Board of Supervisors. However, the Director may refer an appeal directly to the Board of Supervisors. In all instances where a public review process is required, the County insures no more than five public hearings are held, including appeals.

Environmental Review: Once a project is deemed complete, a determination can be made regarding whether the project is categorically exempt from the California Environmental Quality Act (CEQA). Within three business days of determining that an application is complete, the planner will prepare a categorical exemption form and provide it to the environmental planning manager for signature. On the day the appeal period ends, the signed categorical exemption form to the administrative support staff for recording.

In more than 99 percent of cases, a project is categorically exempt, but there are rare instances when an environmental review needs to be conducted. There are essentially two kinds of environmental review: (1) an initial study leading to a Negative Declaration of Environmental Impact; or (2) an Environmental Impact Report (EIR). According to the CEQA Guidelines, an initial study/negative declaration should take no longer than six months to prepare and an EIR should take no longer than a year to prepare.

Merits Review and Decision: After a project is deemed complete and any necessary environmental review has been completed, the review of the merits of an application begins. Public notice, describing the project, is sent out to the surrounding area inviting comments before a decision is made. Most planning permits for development, such as Design Review, are decisions issued "administratively," which means that planning staff issue the decision without a public hearing. Other types of permits, including most Coastal Permits, require a public hearing before a Deputy Zoning Administrator. According to the Permit Streamlining Act, a decision on an application that is categorically exempt from CEQA must be rendered within 60 days of the date on which it is deemed complete. When a project is approved, the approval will contain certain "conditions of approval," or stipulations for measures that must be implemented for the development to proceed. Many conditions of approval are standardized across all discretionary projects. All decisions on discretionary projects can be appealed to the Planning Commission and subsequently the Board of Supervisors for a hearing to reconsider the action taken by the lower decision-making body. Appeals tend to add a considerable amount of time and expense to the review of an application.

Findings for approval: All projects subject to Design Review application must comply with two sets of findings: First, the uniform development standards such as site planning minimum setback requirements, floor area ratio, maximum site coverage, height limits, building location on the site and other development standards. Second, projects subject to Design Review must also comply with findings related to community character, such as architectural design, massing, materials, and scale that are compatible with the site surroundings and the community, must protect access to sunlight, views, vista points etc. These findings are subjective and require interpretation of by staff based on subjective findings and undefined design guidelines.

Overall Review Timeline and impacts on housing development projects. The minimum public hearings and review timelines are affected by location (coastal and non-coastal), as well as whether a project is subject to a design review board, and whether a project is subject to a community/specific plan.

Currently, Marin relies on subjective design standards codified within the County's Development Code and Design Guidelines, various Community Plans, and its discretionary review processes when considering residential or mixed-use development projects. Administered through staff, Planning Commission, or appointed advisory design review boards, the various community plan and design guidelines interpretation and create uncertainty as project modifications are often required throughout the review process. Additionally, design guidelines are difficult to apply consistently. They offer too much room for subjective interpretation and difficult to enforce. Design Guidelines require oversight by discretionary review bodies, leading to a protracted and politicized planning process that can cost time and money.

The Marin County Development Code was amended in January 2023 to establish a new Form Based Code (FBC) residential zoning district. The FBC zoning district would establish objective and precise design standards that offer predictability. Typically, developers borrow money to pursue pre-construction work. For developers, time is money. The biggest incentive that the County can offer is not money, but clear and predictable development standards. Most developers are willing to build to higher standards if the rules are clear and the process is predictable. By offering predictable environment the FBC can reduce risks to developers and offer streamlined process to staff.

Master Plan

The Master Plan review process applies to all existing Master Plans and Precise Development Plans, to Planned Developments in Planned zoning districts, and to subdivisions in Planned zoning districts that are subject to Final Maps. The master plan process is intended to:

- Align with California State Law governing common interest developments;
- Allow for phased developments;
- Establish site specific development criteria;
- Promote clustering of structures to preserve open land areas and avoid environmentally sensitive areas; and
- Protect natural resources, scenic quality, and environmentally sensitive areas.

Affordable housing projects are exempt from the Master Plan requirements.

All Master Plan Reviews require an application and public hearing before the Planning Commission, the Board of Supervisors and, if applicable, by a design review board following the process outlined below:

- Design Review Board: The Design Review Boards hold public hearing for projects located in one of the three geographical areas of the unincorporated Marin County. While Design Review Boards do not issue decisions on master plan projects, they make recommendations to the County staff and planning commission.
- Planning Commission: For Master Plan applications, the Planning Commission holds hearings and makes recommendations to the Board of Supervisors.
- Board of Supervisors: The Board of Supervisors is legislative body that exercises final authority on all master plan applications.

Timing for Permit Processing

Time requirements for review of the merits of a project are contingent on project complexity and environmental impacts. If a house design meets County standards and Uniform Building Code requirements in a conventionally zoned agricultural or urban zoning district, a building permit can be granted without further review. Figure H-3.1 below shows the typical timeline for a discretionary review application that is not subject to CEQA analysis. These include some design reviews, site plan reviews, variance, etc. Once a complete application is submitted, the County will issue a decision within three months. Projects that include more complex applications, such as a rezoning, or require CEQA analysis will have a longer review period.

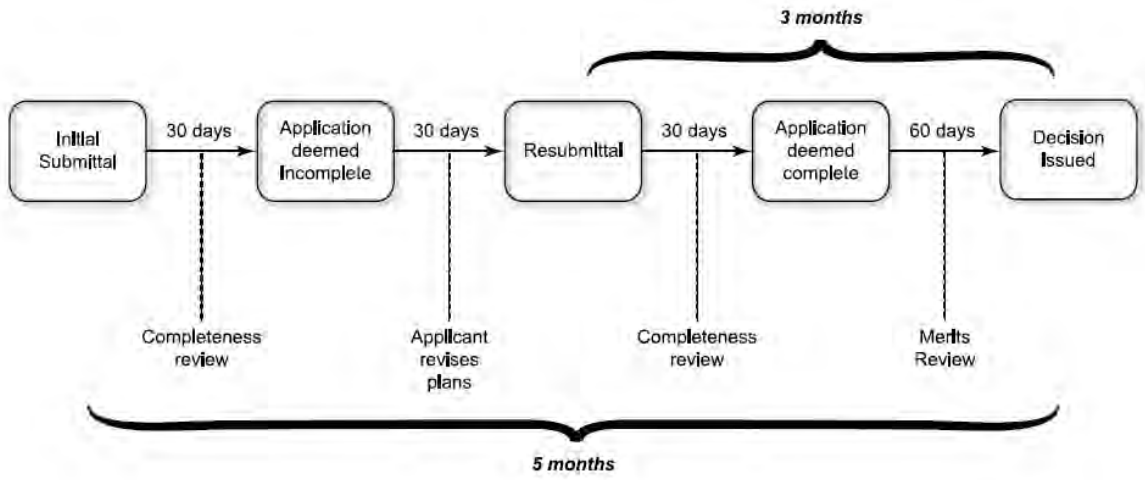
The County recognizes that a streamlined development review process could moderate the cost of development. Several housing programs in this Housing Element demonstrate the County's commitment to streamlining development review. These include:

- Program 2: By Right Approval

- Program 5: SB 9 Mapping Tool
- Program 8: Development Code Amendments
- Program 10: Objective Standards for Off-Site Improvements
- Program 13: Reasonable Accommodation

These programs help streamline the review process for various types of projects. Furthermore, the County offers planning consultation and pre-application conference prior to submitting the Master Plan Review application. County staff will discuss the review procedures, application requirements, application deadlines, and the County's goals, policies, and development standards as they relate to the proposed project.

Figure H-3.1: Typical Discretionary Review Timeline in Marin County (No CEQA Review)



Source: County of Marin Planning Application Guide, Prepared September 2017.

Project Review and Approval for Typical Projects

Projects meeting General Plan and Zoning Code requirements usually require only staff level approval unless appealed. While design review is required for single-family homes in specific community plan areas and for multi-family and mixed use development, object design standards have been established. The tables below provide an overview of the review process for typical projects. The County has recently implemented a number of planning efforts, including the adoption of objective design standards, to streamline project review.

Table H-3.21: Project Review (Non-Coastal Zones)

Project Type	Size	Reviews Required	Approval Body	Required Hearings	No. of Required Hearings	Timeline
Single-Family Home	≤3,500 sq. ft.	Ministerial Building Permit	---	No	---	30 days
	≥3,501 sq. ft.	Design Review[1]	Agency Director[2]	No[3]	Zero to 3 max.[4]	90 days[5]
Multi-Family	< 5 units	Design Review	Agency Director	No	Zero to 3 max	90 days
	5+ units					
Mixed Use	---					

1. Design Review Board hearings are only required for projects located within the Kentfield Community Plan, the Strawberry Community Plan and the Tamalpais Valley Community Plan.
2. Agency Director, or designee, perform design review approval authority.
3. Public hearings are only required upon an appeal or if other aspects of the project require public hearing, such as a subdivision application that required a final map approval by the Board (i.e., major subdivision involving a creation of 5 or more lots or a master plan).
4. The Director's decision is final, unless appealed to the Planning Commission, whose decision in turn is appealable to the Board of Supervisors.
5. For those projects exempt from the requirements of the California Environmental Quality Act (CEQA).

Table H-3.22: Project Review (Coastal Zones)

Project Type	Size	Reviews Required	Approval Body	Required Hearings	No. of Required Hearings	Timeline
Single-Family Home	≤3,500 sq. ft.	Coastal Permit[1]	DZA[2]	Yes	1 to 3 max[3]	90 days[4]
Multi-Family	< 5 units	Design Review	Agency Director	Yes	Zero	90 days
	5+ units					
Mixed Use	---					

i. All new developments in the coastal area require a Coastal Development Permit. There are two types of Coastal Permits (Administrative Coastal Permit and Coastal Development Permits). Administrative Coastal Permits which typically involve additions, minor developments etc. A decision to approve or deny is made by Agency Director or designee. A Coastal Development Permit is subject to a public hearing and decision is entered by a Deputy Zoning Administrator. A Coastal Development Permit is a discretionary application.
ii. Deputy Zoning Administrator is designated as the responsibly body to hold a public hearing for coastal permits subject to public hearings.
iii. A Coastal permit requires a public hearing, which is appealable to the Planning Commission, whose decision is appealable to the Board of Supervisors.
iv. For those projects exempt from the requirements of the California Environmental Quality Act (CEQA).

Permit Processing for Affordable Housing

In conjunction with its analysis and preparation of streamlined review procedures pursuant to SB 35, staff initiated an exploration of potential procedures to expedite review for affordable housing projects. The new Objective Design and Development Standards (described earlier in this Constraints section), was developed in collaboration with cities and towns to streamline the development of housing, including affordable housing.

AB 1397 requires that housing to be developed on reuse or rezone sites be provided ministerial review if the project includes 20% lower income units. This is part of the Housing Element's adequate sites program (please see Chapter 5).

Streamlining Building Permit Review

to make the zoning compliance process as efficient as possible, the County's 2021 Development Code amendments included changes to the building permit review. These changes included:

1. Community Plan policies and discretionary standards would no longer modify the Design Review exemptions.
2. Recent work under separate building permits would no longer prevent Design Review exemptions from applying to new work.
3. Second story porches would be exempt from Design Review as long as they meet certain setbacks.
4. The installation of power generators would be exempt from Design Review as long as they meet 10-foot side and rear yard setbacks (or the setbacks required in the governing conventional zoning districts.

Fees and Exactions

Planning Fees

The County collects various fees from development to cover the costs of processing permits, including planning review, environmental review, engineering, and plan review and building permits, among others. Table III-21 shows the 2021 Planning Fee Schedule, available on the County's website. Most jurisdictions, the County of Marin among them, establish fees designed to cover the costs of staff time charged on an hourly basis and materials, consistent with California law. The fees noted in the fee schedule are minimum fees to be paid at the time of application filing to cover the average County cost of review. Should actual costs exceed the amount of any fee, the applicant is billed for additional costs and if the initial fees submitted exceed the cost of reviewing the application, then the fees remaining are refunded to the applicant.

Table H-3.23: Planning Fees

Permit Type	Fee Amount (Deposit)
Accessory Dwelling Unit	$500
Coastal	
Regular	$5,804
Minor/Amendment	$3,482
Exclusion	$164
Design Review	
Residential – Regular	$4,643
Residential – Minor	$1,741
Environmental Review	
Initial Study	$17,411
Environmental Review Contract Overhead	30%
Master Plans	
Regular	$23,214
Minor/Amendment	$11,607
Plan Amendment	$35,861
Property Modification	
Lot Line Adjustment	$2,321
Merger	$361
Tentative Map – Major	$23,214
Tentative Map – Minor	$11,607
Rezoning	$23,214
Site Plan Review	$2,086
Use	
Master Use Permit	$8,125
Major	$8,125
Regular/CUP Amendments	$4,643
Variance	
Regular	$4,643
Minor Amendment	$2,086

Source: Marin County Community Development Agency, 2019 Fee Schedule

Affordable Housing Impact Fees

Several fees are included as are part of the County's Affordable Housing Program. The County adjusts its Affordable Housing Impact, In-Lieu Housing, and Rental Housing Impact fees annually based on the higher of either the Consumer Price Index (CPI) or Shelter for the Construction Cost Index (CCI) published by the Engineering-News Record. The County's Jobs/Housing Linkage Fees for Residential Care Facilities and Skilled Nursing Facilities are likewise updated. During calendar year 2020, the Marin Housing Trust fund collected $507,041 in impact, inclusionary, and jobs/housing linkage fees.

Affordable Housing Impact Fee

Because the majority of homes constructed in Marin County consist of custom-built, high-end units, most residential development is not subject to the Inclusionary Housing requirement. The County found it appropriate to establish a fee on single-family home development to address the shortage of low income homes in the community. A nexus study was conducted in 2008 to determine the appropriate amount for an affordable housing impact fee to be charged on new single-family home development that would mitigate the impact of an increase in demand for affordable housing due to employment growth associated with the new single-family development.

The Affordable Housing Impact Fee, adopted in October 2008, applies to all new single-family homes greater than 2,000 square feet. Teardowns and major remodels that would result in over 500 square feet of new space and a floor area of greater than 2,000 square feet are also subject to the Affordable Housing Impact Fee. The fee is either waived or reduced when a second unit is included as part of the proposed project. Fees are assessed as shown in Table H-3.24 below.

Table H-3.24: Affordable Housing Impact Fee

Example Home Size	Fee Per Square Foot	Housing Impact Fee ($5 and $10 per sq ft)	If proposed project includes second unit or agricultural worker unit
< 2,000	$0	$0	$0
2,500	$6.95	$2,500	$0
> 3,000	$10	$10,000	$5,000
3,500	$14.74	$15,000	$7,500
4,000	$10	$20,000	$10,000

Source: Marin County Ordinance No. 3500, adopted 10/14/2008

In-Lieu Housing Fee

An in-lieu housing fee is required for the portion of subdivisions or multi-family development that results in a fractional share of less than 0.5 of a unit. This fee is paid at the time the subdivision map is recorded or at the time a building permit is issued (if the project consists of the construction of multiple-family units). The County adjusts its in-lieu housing fee annually based on the higher of either CPI for CCI published by the Engineering-News Record.

Jobs/Housing Linkage Fee

Per Section 22.22.100 of the County Development Code, development with no residential component must pay a jobs/housing linkage fee. This fee is based on the development type and floor areas of the development and is collected at the time a Building Permit is issued. Alternatively, an applicant for a non-residential development may propose to provide the number of new affordable units required by the Development Code.

Permit Fees – Outside Agencies

Unincorporated Marin County ‘s water and sanitary disposal needs are serviced by 20 separate water, sanitation, community service, and public utility districts. Upon adoption of the 6th Cycle Housing Element, the Community Development Agency will inform all districts of the Housing Element update through written correspondence. Per Government Code Section 65589.7, the letter will detail:

- The need to accommodate new residential units per the Regional Housing Needs Allocation at the prescribed income levels.
- The requirement that water and sewer providers must grant priority for service allocations to proposed developments that include housing units affordable to lower- income households.

Upon adoption, the Community Development Agency will provide a copy of the Housing Element to water and sewer providers.

Fees from outside agencies constitute a significant share of the total fees charged to a project. While the County does not control outside agency fee schedules, a program is included to work with these agencies to encourage fee waivers for affordable and special needs housing.

Water Connection and Impact Fees

Water fees are determined by each water district. Unincorporated Marin County is served primarily by two districts: North Marin Water District and Marin Municipal Water District. This fee analysis continues using the two previously described housing scenarios of a 2,400-square-foot house and a 10-unit condo development.

below summarizes typical water fees for new residential developments. It includes installation fee, connection fee, meter charge, and any other initial fees required prior to the commencement of service. Monthly service fees and any other ongoing charges are not included.

Recognizing that water connection fees may serve as a constraint to affordable housing development, the Marin Municipal Water District (MMWD) offers a 50% fee reduction for qualified affordable housing projects (affordable to low and moderate income households for at least 30 years, with at least 50% of the project affordable to low income households), as well as to second units deed-restricted to rents affordable to lower income households for a minimum of 10 years.

Table H-3.25: Average Water Fees

Service Area	Water District	Single-family Home	10-Unit Condo Development
Belvedere	Marin Municipal Water District	$23,040	$16,000 plus $7,720 per meter
Corte Madera			
Fairfax			
Larkspur			
Mill Valley			
Ross/Kentfield			
Tiburon			
San Anselmo			
San Rafael			
Novato	North Marin Water District*	$28,600	$172,000 ($17,200 per unit)

Source: Marin Municipal Water District and North Marin Water District, 2022

**Facilities reserve charges*

Sewer Connection and Impact Fees

Unincorporated Marin is served by approximately 16 sanitary districts. Each sanitary district categorizes and calculates sewer fees using a different method. A new residential development may be subject to fees for permits, inspections, connection, and impact. Terminology between districts is not standardized. The average fees provided in summarize typical sewer fees for new residential developments. The tables include installation fees, connection fees, inspection fees, and any other initial fees charged prior to the commencement of service. Monthly service fees and any other ongoing charges are not included. Despite the number of sanitary districts and charging methods, sewer fee levels are remarkably consistent across the surveyed jurisdictions.

Table H-3.26: Average Sanitary Fees

Sanitary District	Single-Family	Small Multi-Unit (2-4 units), per project	Large Multi-Unit (5+ units), per project
Almonte	$4,000	$4,000	$4,000
Alto	$7,414	$9,268+	$16,684+
District #1 (Ross Valley)	$15,773.16+	$30,738.32+	$75,753.80+
District #2 (Corte Madera)	$9,281	$11,884.42+	$21,493.42+
District #5 (Tiburon/Belvedere)	~$6,500	~$13,000+	~$32,500+
Homestead Valley	$4,000	$4,000+	$4,000+
Las Gallinas Valley	$7,166	$13,832+	$33,830+
Novato	$12,990	$12,990	$12,990
San Rafael	$10,482.42	$20,964.84+	$52,412.10+
Tamalpais CSD	$17,231	$22,796+	$48,213+
Tomales Village CSD	$10,000	$10,000	$10,000
Richardson Bay	$12,990.00	$12,990.00	$12,990.00
Sausalito/Marin City	$6,130	$6,130	$6,130
Bolinas Community Public Utility District*	N/A	N/A	N/A

Source: Survey of Marin County sanitary districts, 2022

**Since 1985, BCPUD has a moratorium on new connections to their sewer system.*

Estimated Total Fees

Table H-3.27 illustrates the cost of two development scenarios incurred from fees assessed by Marin County and other impact fees. The first scenario is a 2,400-square-foot, three-bedroom, single-family home on a 10,000-square-foot lot with a 400-square-foot garage at a density of four units per acre. The second scenario is a multi-family condominium development with 10 1,200-square-foot, two-bedroom units on 0.5-acre site. Line item fees related to processing, inspections, and installation services are limited by California law to the cost to the agencies of performing these services.

It should be noted that there are different types of design review applications. Assuming regular residential design review, the current fee is $4,643. For Scenario B, County fees account for $18,304.30 per unit, or about 1.8% of the sales price. Fees charged by outside agencies vary by location. In general, fees from other agencies (water, sewer, etc.) can add another $21,862 to the cost of development for Scenario B. Total fees account for about 4% of the sales price.

Overall, on a per-unit basis, the planning and development fees do not unduly constrain multi-family housing development, when compared to single-family development.

Table H-3.27: Estimated Permit and Impact Fees Assessed

Permit Type / Impact Fee	Scenario A: Single-family house, 2400 sq ft, 3 bedrooms. 10,000 sq ft lot, 4 units/acre. Construction $8500,000/unit. Sale $1,500,000/unit.	Scenario B: 10-unit condo development, 1,200 sq ft, 2 bedrooms. 0.5 acre lot, 20 units/acre. Construction $700,000/unit. Sale $1,000,000/unit.
County Fees		
Design Review		
Building Permit	$6,100	$7,052.75
Plan Review	$16,204.53	$18,734.24
Title 24 Energy Fee	Included	Included
BSC “Green” Tax	$60	$600.00
Seismic Tax	$195	$1,950
Affordable Housing Impact Fee	$16,680	$0
Technology Fee	$1,262.69	$1,459.81
Engineering Plan Check	Included	Included

Permit Type / Impact Fee	Scenario A: Single-family house, 2400 sq ft, 3 bedrooms. 10,000 sq ft lot, 4 units/acre. Construction $8500,000/unit. Sale $1,500,000/unit.	Scenario B: 10-unit condo development, 1,200 sq ft, 2 bedrooms. 0.5 acre lot, 20 units/acre. Construction $700,000/unit. Sale $1,000,000/unit.
Planning Zoning Review	$2,020.00	$2,020.00
Plumbing/Gas Permit	Included	Included
Electrical Permit	Included	Included
Mechanical Permit	Included	Included
General Plan Surcharge	$2,104.48	$2,433.02
Other	$4,840.31	$5,595.94
Roads	$15,000	$150,000
In-Lieu Park Dedication Fee[1]	See note	See note
Total County Fees	$41,887.01	$183,043.01 ($18,304.30 per unit)
Impact Fee by Outside Agencies		
School Impact Fee[2]	$8,352	$4,176
Marin Municipal Water District[3]	$7,380	$7,380
San Rafael Sanitation District	$10,306	$10,306
Estimated Total Fees (with Outside Agencies)	$67,925.01	$40,166.30

Source: Marin County Community Development Agency, 2022

1. *The in-lieu park dedication fee applies to subdivisions and is calculated by multiplying the number of dwelling units by the number of acres of parkland required per dwelling unit multiplied by the fair market value per buildable acre by 1.20. This fee is paid at the time a Parcel or Final Map is recorded. Please refer to Section 22.98.040 of the Marin County Development Code* for more information.*
2. *Per square foot school impact fees range from $2.29 for Lagunitas School District to $4.79 for Mill Valley School District. However, most school districts set the fee at $3.48. This analysis uses this typical fee for calculation.*
3. *Ranges from $7,040 to $7,720 depending on meter size. An average fee of $7,380 is used.*

Building Code and Enforcement

Marin County adopts the California Building Standards Code (Title 24, CCR) that establishes minimum standards for building construction. The County has amended two specific provisions contained in the State codes which can impose additional costs on residential development: 1) fire sprinklers are required in any residential addition or substantial remodel that exceeds 50% of the area of the original structure, and 2) Class A roofing is required because of potential fire hazard. The standards may add material and labor costs but are felt to be necessary minimum standards for the health and safety of firefighters, those occupying the structures, and the general public.

In February 2020, the Board of Supervisors adopted an ordinance updating building permit fees. These fees had only increased once since 2009. The fee increases were needed to provide the necessary revenue to support ongoing Building Division services including permit issuance and inspections.

The County also enforces local provisions related to energy conservation and green building. While these requirements have been strengthened over time resulting in increased construction costs, greater energy efficiency results in lower operating costs for the resident and lower greenhouse gas production resulting from the construction process. For additional information on the County's energy efficiency efforts, refer to Section IV: Sites Inventory and Analysis.

The County's code enforcement program is complaint driven. The County has four staff dedicated to building and zoning code enforcement while additional staff is dedicated to septic system monitoring and enforcement. Most complaints are resolved voluntarily through corrective action by the property owner, although some require additional actions through hearings and assessment of fines. In instances where work is done without building permits, additional fees and penalties are assessed and the work must meet minimum code standards.

Code enforcement staff have been trained on available resources and make referrals when appropriate. For example, they make referrals to Marin Housing Authority for the rehabilitation loan program, to the Marin Center for Independent Living for accessibility rehabilitation needs, and to the Department of Health and Human Services for support services. The County has adopted policy consistent with Health and Safety Code Section 17980(b)(2), and code enforcement staff use these guidelines in their enforcement activities.

On/Off-Site Improvement Standards and Exactions

Administered by the Department of Public Works and the Community Development Agency, standards for on- and off-site improvements are detailed in the County Code.

Requirements are generally set for street improvements, driveways, landscaping, easements, drainage, parkland dedication and fees, sewage disposal, and water supply.

Overall, the purpose of on- and off-site requirements is to ensure the health and safety of residents. While required on- and off-site improvements may add to the cost of housing on affected properties, it is not evidenced that these requirements and associated costs represent a higher standard than other jurisdictions in the County and beyond. For example, the required width of public utility easements is no less than 10 feet for the unincorporated County, San Rafael, and Novato. Parkland dedications and fees are calculated in an identical fashion to San Rafael and Novato. Additionally, street and driveway widths and grades in the County's Development Code are on par with the requirements set forth in Novato's and San Rafael's codes. On- and off-site improvement requirements do not constitute extraneous requirements, with the exception perhaps of landscaping and parkland dedication requirements.

Technically, all developments are subject to off-site improvements that could include curbs, gutters, sidewalks, street pavement, driveways, parking areas, retaining walls, storm drainage facilities, and related improvements, and dedication of such additional rights-of-way as are necessary. However, developments are not automatically required to provide off-site improvements but are evaluated on a case-by-case basis depending on project location and size, and existing facilities available. The off-site improvement standards required by unincorporated Marin County are typical for most suburban communities and do not pose unusual constraints for housing development.

Several of the parcels zoned for multi-family housing in the sites inventory are considered infill sites, and as such, are not required to complete major infrastructure improvements. Based upon recent proposals submitted by the development community for a variety of housing sites throughout unincorporated Marin County, it is apparent that the off-site improvements required for housing development is not a constraint on housing development.

On-site improvement standards, in most cases, do not pose unusual constraints for housing development. However, some housing sites require infrastructure connections or improvements including for example, onsite wastewater systems, that can increase the cost of development beyond typical suburban development. County staff have recognized this constraint and there are several programs in progress or in place to help facilitate the development of wastewater improvements.

Incentives for Affordable Housing – Providing Incentives and Removing Barriers

Amendments to the Marin County Development Code in 2008 and 2012 clarified incentives for affordable housing development. Chapter 22.24 clearly outlines a range of incentives, such as density bonuses, technical assistance, site development alternative standards, and fee waivers to encourage and facilitate the development of affordable homes. Many of these incentives and programs were described earlier in this Constraints section.

Incentives for inclusionary and 100% affordable housing include:

- Density for affordable housing projects. For affordable housing located in all districts that allow residential uses, allowable density will be established by the maximum Marin Countywide Plan density range, subject to all applicable Countywide Plan policies.
- County density bonus. An increase in density of up to 10% of the number of dwelling units normally allowed by the applicable zoning district in a proposed residential development or subdivision.
- Interior design. The applicant may have the option of reducing the interior amenity level and the square footage of inclusionary units below that of large market-rate units, provided that all of the dwelling units conform to the requirements of County Building and Housing Codes and the Director finds that the reduction in interior amenity level will provide a quality and healthy living environment. The County strongly encourages the use of green building principles, such as the use of environmentally preferable interior finishes and flooring, as well as the installation of water and energy efficient hardware, wherever feasible.
- Unit types. In a residential project that contains single-family detached homes, inclusionary units may be attached living units rather than detached homes or may be constructed on smaller lots.
- On-site inclusionary housing for commercial and industrial development. As an inducement to include on-site inclusionary housing in a commercial or industrial development, the County may grant a reduction in the Development Code's site development standards or in architectural design requirements that exceed the minimum building standards approved by the State Building Standards Commission in compliance with State law (Health and Safety Code Sections 18901 et seq.), including, but not limited to, setbacks, coverage, and parking requirements.
- Affordable housing on mixed-use and industrial sites. In commercial/mixed-use and industrial land use categories, as designated in the Countywide Plan, the floor-

area ratio may be exceeded for income-restricted units that are affordable to very low, low, or moderate income persons, subject to any limitations in the Countywide Plan.

- Impacted roadways. In areas restricted to the low end of the density range due to vehicle Level of Service standards, affordable housing developments may be considered for densities higher than the low-end standard in the Countywide Plan.
- Fee waivers. The County may waive any County fees applicable to the affordable or income-restricted units of a proposed residential, commercial, or industrial development. In addition, for projects developed pursuant to Housing Overlay Designation policies and for income-restricted housing developments that are affordable to very low or low income persons, the Director may waive fees or transfer In-Lieu Housing Trust funds to pay for up to 100% of Community Development Agency fees.
- Projects developed pursuant to Housing Overlay Designation policies. Residential development projects developed in conformance with Housing Overlay Designation policies may be granted adjustments in development standards, such as parking, floor area ratio, and height, as provided in the Countywide Plan.
- Technical assistance. to emphasize the importance of securing affordable housing as a part of the County's affordable housing program, the County may provide assistance to applicants in qualifying for financial subsidy programs.
- Priority processing. The County shall priority process projects developed pursuant to Housing Overlay Designation policies and affordable housing developments that are affordable to very low or low income persons.

The Community Development Agency has also increasingly taken the opportunity to connect applicants for affordable housing projects and community groups in the pre-application process by noticing, facilitating, or funding community engagement and visioning exercises.

Housing for People with Disabilities

As noted in the Special Needs section of the Housing Needs Assessment, persons with disabilities have specific housing needs related to affordability, accessibility, access to transportation and services, and alternative living arrangements (such as Single Room Occupancy units and housing that includes supportive services). The County ensures that new housing developments comply with California building standards (Title 24 of the California Code of Regulations) and Federal requirements for accessibility.

Reasonable Accommodation

A series of Federal and State laws have been enacted to prohibit policies that act as a barrier to individuals with disabilities who are seeking housing. Among such laws are the Federal Fair Housing Amendments Act of 1988, California's Fair Employment and Housing Act, the Lanterman Developmental Disabilities Services Act (§5115 and §5116) of the California Welfare and Institutions Code, California's AB 686 to Affirmatively Further Fair Housing, and additional components of Housing Element law. Additionally, the U.S. Department of Housing and Urban Development (HUD) requires that localities utilizing Community Planning and Development funds such as CDBG and HOME funds administer programs in a manner that affirmatively further fair housing. Taken together, these pieces of legislation require jurisdictions to take affirmative action to eliminate regulations and practices that deny housing opportunities to individuals with disabilities.

Procedures for Ensuring Reasonable Accommodations

Ordinance 3668 establishes a procedure for making requests for reasonable accommodation in land use, zoning and building regulations, and practices and procedures of the County of Marin to comply fully with the intent and purpose of fair housing laws. Requests for reasonable accommodation shall be reviewed by the Director of the Community Development Agency and a written decision shall be issued within 30 business days of the date of the application being deemed complete and may grant, grant with modifications, or deny a request using the following criteria:

1. Whether the housing, which is the subject of the request for reasonable accommodation, will be used by an individual with disabilities protected under fair housing laws;
2. Whether the requested accommodation is necessary to make use or enjoyment of housing available to an individual with disabilities protected under fair housing laws;
3. Whether the requested accommodation would impose an undue financial or administrative burden on the County;
4. Whether the requested accommodation would require a fundamental alteration in the nature of the County's land use and zoning or building program; and
5. Whether there is an alternative accommodation which may provide an equivalent level of benefit to the Applicant.

Efforts to Remove Regulatory Constraints for Persons with Disabilities

The State has removed any local discretion for review of small group homes for persons with disabilities (six or fewer clients plus the owner's household) which must be treated like one family or household occupying a dwelling unit. The County does not impose additional zoning, building code, or permitting procedures other than those allowed by

State law. There are no County initiated constraints on housing for persons with disabilities caused or controlled by the County. The County also allows residential retrofitting to increase the suitability of homes for persons with disabilities in compliance with accessibility requirements through reasonable accommodation requests. Further, the County works with applicants who need special accommodations in their homes to ensure that application of building code requirements does not create a constraint. Please see Ordinance 3668 provisions above.

County Housing and Federal Grants Division staff actively refer tenants in need of assistance making reasonable accommodation requests in the private housing market to the Marin Center for Independent Living (MCIL) and Fair Housing Advocates of Northern California (FHANC). Both organizations were supported in their work by CDBG funding. MCIL received funding to its home modification program for homes occupied by low income individuals with disabilities. FHANC received funding to support its fair housing monitoring and assistance.

Zoning and Other Land Use Regulations

The County has not identified any zoning or other land-use regulatory practices that could discriminate against persons with disabilities and impede the availability of housing for these individuals. Examples of the ways in which the County facilitates housing for persons with disabilities through its regulatory and permitting processes include:

- The County permits group homes of all sizes in all residential districts. All of the County's commercial zones also allow group homes. The County has no authority to approve or deny group homes of six or fewer people, except for compliance with building code requirements, which are also governed by the State.
- The County does not restrict occupancy of unrelated individuals in group homes and does not define family or enforce a definition in its zoning ordinances.
- The County permits housing for special needs groups, including for individuals with disabilities, without regard to distances between such uses or the number of uses in any part of the County. The Land Use Element of the General Plan does not restrict the siting of special needs housing.

Permitting Procedures

The County does not impose special permit procedures or requirements that could impede the retrofitting of homes for accessibility. Requirements for building permits and inspections are the same as for other residential projects. Staff is not aware of any instances in which an applicant experienced delays or rejection of a retrofitting proposal for accessibility to persons with disabilities. As discussed above, County Code allows group homes of six or fewer persons by right, as required by State law. No use permit or

other special permitting requirements apply to such homes. The County does require a use permit for group homes of more than six persons in all residential and commercial zones that allow for residential uses. The County does not impose special occupancy permit requirements or business licenses for the establishment or retrofitting of structures for residential use by persons with disabilities. If structural improvements are necessary for an existing group home, a building permit would be required. If a new structure were proposed for a group home use, design review would be required as for other new residential structures. The permit process has not been used to deny or substantially modify a housing project for persons with disabilities to the point where the project became no longer feasible.

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CHAPTER 4: RESOURCES

Land Characteristics of Marin County: Development Policy and Objectives

Marin County includes a total area of approximately 606 square miles of land and water. Nearly 84% of the County consists of open space, watersheds, tidelands, parks, and agricultural lands.[1] Significant public amenities include the Federally protected Golden Gate National Recreation Area, the Marin Islands National Wildlife Refuge, the Muir Woods National Monument, the Point Reyes National Seashore, and the San Pablo Bay National Wildlife Refuge. About 11% of Marin County's area has been developed, primarily within cities and towns, near services, and along major transportation corridors. Much of the additional land potentially available for development (approximately 5% of the County) is in incorporated cities and towns.

As discussed in Section Three of the Housing Element (Constraints), the Marin Countywide Plan (2007) recognizes four separate environmental corridors present in the County, based on specific geographic and environmental characteristics and natural boundaries formed by north-south running ridges.

- The Baylands Corridor, encompassing lands along the shoreline of San Francisco, San Pablo, and Richardson Bays, provides heightened recognition of the unique environmental characteristics of this area and the need to protect its important resources. The area generally contains marshes, tidelands, and diked lands that were once wetlands or part of the bays, and adjacent, largely undeveloped uplands. Less than 1% of the County's residents live in the Baylands Corridor.
- The City-Centered Corridor, along Highway 101 in the eastern part of the County near San Francisco and San Pablo bays, is designated primarily for urban development and for the protection of environmental resources. This corridor is divided into six planning areas, generally based on watersheds, and is intertwined with Marin's 11 cities and towns. Nearly 96% of Marin County's population lives in the City Centered Corridor, where the majority of development is concentrated.
- The Inland Rural Corridor in the central and northwestern part of the County is designated primarily for agriculture and compatible uses, as well as for the preservation of existing small communities. Less than 2% of Marin County's population lives in the Inland Rural Corridor.
- The Coastal Corridor is adjacent to the Pacific Ocean and is designated primarily for agriculture, Federal parklands, recreational uses, and the preservation of

[1] Marin Countywide Plan, Built Environment Element, pages 3-10.

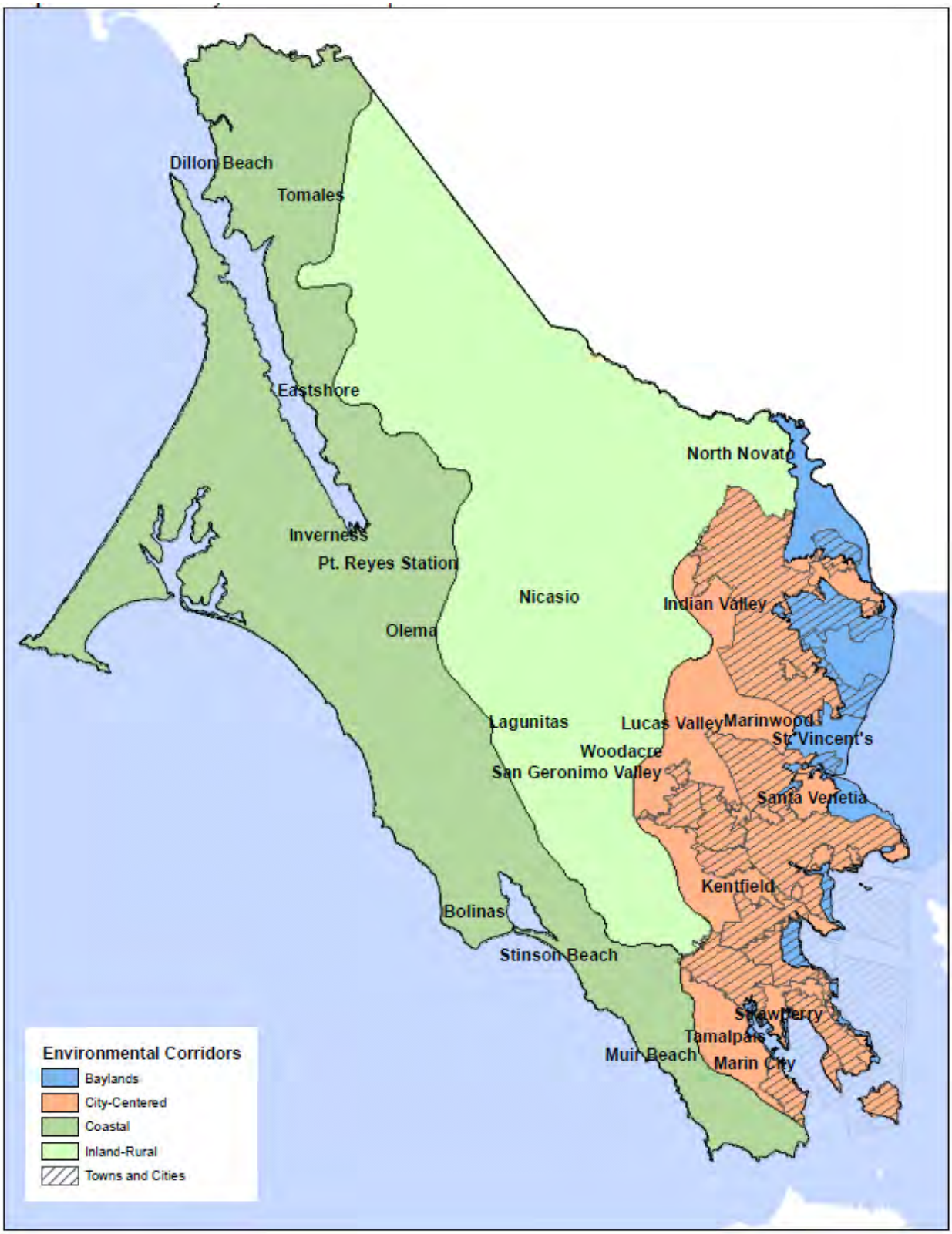
existing small coastal communities. Approximately 2% of Marin County residents live in the Coastal Corridor.[2]

As a result of policies in the Countywide Plan, community plans, and the Local Coastal Program, residential development in Marin County is primarily directed to the City-Centered Corridor and limited to the Inland Rural and Coastal Corridors. Development of moderate densities is most compatible with the City-Centered Corridor, close to transit, services, and Marin's cities and towns.

The Inland Rural and Coastal communities recognize the need and advocate for housing affordable to visitor-serving employees, agricultural workers, and other local workers in their communities. Multi-family or moderately dense development permitted in the coastal areas is directed as infill within the various villages.

[2] General Demographic Characteristics for Marin County California Cities and Places, Marin County Community Development Agency

Figure H-4.1: Marin County and its Unincorporated Communities



Affordable Housing in Marin County

As of March 2020, there were approximately 6,125 households benefiting from deed restricted affordable housing throughout Marin County's 12 jurisdictions.[3] These units typically target renter-households earning 60% of area median income or below and serve populations including low and very low income families, households with disabilities, formerly homeless adults, and older adults.[4] Affordable homeownership units typically serve moderate income and below. Affordable housing developers and developers with nonprofit arms manage approximately 4,100 of these units. Nearly 3,000 of these units are assisted through the Marin Housing Authority's Section 8 and public housing programs. Of the public housing units, 296 units serve families, and 200 units serve senior and disabled households. The 6,125 units consist of the following types:

- 496 Public Housing Units
- 1,126 Senior Units
- 2,771 Family Housing Units
- 207 units for Persons with Disabilities
- 832 Home Ownership Units[5]
- 337 Permanent Supportive Housing Units
- 336 Transitional and Shelter Units

Of these 6,125 units restricted to moderate, low, very low, and extremely low income households, 761 are located in the unincorporated County, not including Section 8 vouchers. The Marin Housing Authority manages 340 Below Market Rate (BMR) home ownership units throughout Marin County that are preserved by deed-restriction, of which 90 units are in the unincorporated County. The Marin Housing Authority processes all sales of new units, resales of existing units, refinances, capital improvement evaluations, down payment assistance, and monitoring of the portfolio for compliance with BMR Program requirements. MHA also works with developers at the initial stage to formulate Developer Agreements determining the affordability range and construction requirements for these BMR units. The majority of affordable housing is in the City-Centered Corridor, although there are several deed restricted rental and ownership properties in the villages of West Marin and the Inland Rural Corridor. These developments demonstrate the future potential for affordable housing in a range of communities and geographic locations throughout the diverse environs of unincorporated Marin.

[3] Marin County 2020-2024 Consolidated Plan
[4] Some communities have deed-restricted moderate income households, While tax credit projects are aimed at 60% of median or below, inclusionary ordinances are often aimed at 80% and below.
[5] These affordable homeownership units typically serve moderate income households

Regional Housing Needs Allocation

The Regional Housing Needs Allocation (RHNA) is a key part of State housing element law (Government Code Section 65580) and is a central factor in satisfying periodic required updates of the housing element. Every city and county in the State of California has a legal obligation to respond to its fair share of the existing and projected future housing needs in the region in which it is located. Housing element law requires local governments to update land use plans, policies, and zoning to accommodate projected housing growth. The RHNA figure is not a projection of residential building permit activities, but of housing need based on regional growth projections and regional policies for accommodating that growth. On December 16, 2021, the Association of Bay Area Governments (ABAG) Executive Board adopted the Final RHNA Plan: San Francisco Bay Area, 2023-2031. Table H-4.1 summarizes the Regional Housing Needs Allocation for all jurisdictions in Marin County. All Marin jurisdictions saw a significant increase in the 2023-2031 RHNA allocation from the 2014-2022 allocation.

Table H-4.1: Regional Needs Housing Allocation, 2023-2031 Planning Period

Jurisdiction	RHNA Units Needed By Income Category				2023-2031	2015-2023
	Very Low (0-50% AMI)†	Low (51-80% AMI)	Moderate (81-120% AMI)	Above Moderate (120%+ AMI)		
Belvedere	49	28	23	60	160	16
Corte Madera	213	123	108	281	725	72
Fairfax	149	86	71	184	490	61
Larkspur	291	168	145	375	979	132
Mill Valley	262	151	126	326	865	129
Novato	570	328	332	860	2,090	415
Ross	34	20	16	41	111	18
San Anselmo	253	145	121	314	833	106
San Rafael	857	492	521	1,350	3,220	1,007
Sausalito	200	115	114	295	724	79
Tiburon	193	110	93	243	639	78
Unincorporated	1,100	634	512	1,323	3,569	185
TOTAL	4,171	2,400	2,182	5,652	14,405	2,298

Source: https://abag.ca.gov/sites/default/files/documents/2022-04/Final_RHNA_Methodology_Report_2023-2031_March2022_Update.pdf

† Extremely Low Income (ELI) units are assumed to be 50% of the Very Low (VL) income RHNA figure, or 27 units, for the unincorporated County.

Every housing element must demonstrate that the local jurisdiction has made adequate provisions to support the development of housing at various income levels (extremely low, very low, low, moderate, and above moderate) to meet its 'fair share' of the existing and projected regional housing need. However, because local jurisdictions rarely, if ever, develop and construct housing units, the RHNA numbers establish goals that are used to guide planning, zoning, and development decision- making. Specifically, the numbers establish a gauge for determining whether the County is allocating adequate sites at a range of densities to accommodate the development of housing– meeting the County's RHNA. In particular, the County must identify adequate sites for lower income households i that will allow residential uses at least 20 units per acre. Appendix B includes an evaluation of the County's progress toward its 2015-2023 Regional Housing Needs Allocation.

Strategies for Meeting RHNA

This section of the Housing Element addresses the requirements of Government Code Sections 65583 and 65583.2, which require the County to provide an inventory of sites suitable for housing development that can accommodate Marin County's short-term housing development objectives, as determined by the Regional Housing Needs Assessment (RHNA) for the Housing Element planning period of June 30, 2022, and ending December 31, 2030.

Methodology to Satisfy the Regional Housing Needs Allocation

Marin County's housing needs will be met through the implementation of a variety of strategies. The primary method for addressing the adequate sites requirement is the identification of available vacant and underutilized sites that are appropriately zoned and likely to develop within this planning period.

The analysis includes a parcel-specific inventory of appropriately zoned, available, and suitable sites that can provide realistic opportunities for the provision of housing to all income segments within the community as well as potential rezone sites.

The RHNA projection period began on June 30, 2022. Therefore, projects that have been approved or entitled but have not received permits as of June 30, 2022, can be credited against the RHNA. Furthermore, jurisdictions are allowed to project the number of Accessory Dwelling Units (ADUs) that might be developed over eight years based on development trends during the current planning cycle to help satisfy the RHNA requirements.

Table H-4.2 shows that there were not enough appropriately zoned sites, units being developed, and ADUs to meet RHNA needs, with a shortfall of 2,864 units. The County has identified 1,349.3 acres (129 parcels) that have the capacity for 3,210 units to meet the RHNA. Rezoning of these sites to meet the RHNA is being conducted concurrent with the Housing Element update and is expected to be completed by the end of January 2023. Therefore, before the statutory deadline of the Housing Element update

(January 31, 2023) and by the time of the 6th cycle Housing Element adoption, the County will have provided an adequate inventory of sites to fully meet the County's RHNA by all income categories.

Table H-4.2: Strategies to Meet RHNA

RHNA and Strategies	Housing Units by RHNA Income Categories				Total
	Lower		Mod (80-100% AMI)	Above Mod (>100% AMI)	
	Very Low (0-50% AMI)	Low (50-80% AMI)			
RHNA	1,100	634	512	1,323	3,569
Approved/Entitled	39	164	115	107	425
Accessory Dwelling Units	84	84	84	28	280
Sites not Requiring Rezoning		-	-	25	25
Surplus/(Shortfall)		(1,363)	(313)	(1,188)	(2,864)
Sites Requiring Rezoning		1,637	400	1,173	3,210

Approved or Entitled Projects

A jurisdiction may credit units from entitled projects, approved projects, or projects under construction and not expected to be finaled prior to June 30, 2022, toward its RHNA. These units can be credited against the RHNA to determine the balance of site capacity that must be identified. The list of approved projects is included in Table H-4.3. In total, the County has approved 425 units (39 very low, 164 low, and 115 moderate, and 107 above moderate). Many of these projects are nearing the construction phase and are expected to be completed during the 6th Cycle planning period. The affordability of the units was determined based on the affordability specified on the project proposal as approved by the County.

Table H-4.3: Credits toward RHNA - Approved or Entitled Projects

	RHNA Unit Credits by Income Level					Description of affordability
	Very Low (0-50% AMI)	Low (50-80% AMI)	Mod (80-100% AMI)	Above Mod (>100 % AMI)	Total	
Entitled/Approved Projects						
150 Shoreline	0	0	0	10	10	2 units at 60% based on County's inclusionary requirement
825 Drake	37	37	0	0	74	100% affordable SB 35 project w/ tax exempt bonds, Section 8 PBV and County Housing Trust funds, and Regulatory Agreement
Albion Monolith	0	1	0	8	9	1 unit at 60% based on County's inclusionary requirement
Aspen Lots	0	2	0	0	2	Local community land trust, County funds, and Regulatory Agreement restrict at 80% AMI
Downtown Project	2	7	0	0	9	Local community land trust, County funds, and Regulatory Agreement restrict 2 at 30% AMI, 7 at 50% AMI.
North Coast Seminary	0	0	0	89	89	18 units at 60% based on County's inclusionary requirement
Overlook Lots	0	2	0	0	2	Local community land trust, County funds and Regulatory Agreement restrict at 80% AMI
San Quentin Adjacent Vacant Property	0	115	115	0	230	State excess sites program County funds, 50% of units at or below 60% AMI, remaining units at low to moderate
Total Credits	*39*	*164*	*115*	*107*	*425*	

Source: Marin County, May 2022.

Accessory Dwelling Units

In addition, pursuant to State law, the County may credit potential ADUs to the RHNA requirements by using the trends in ADU construction to estimate new production. According to ABAG's "Using ADUs to Satisfy RHNA" Technical Memo,6 the estimate should be based on the average number of ADU building permits issued each year, multiplied by eight (because there are eight years in a housing element cycle). Most cities base their determination of annual ADU permits by averaging the building permits approved each year since 2019 when state law made it easier to construct the units.

There is a small amount of flexibility in the calculations. If numbers were low in 2019 but were high in 2020, 2021, and 2022, a jurisdiction could potentially use 2020-2022 as the baseline. This rationale would be bolstered if there was a logical explanation for the change, e.g., the jurisdiction further loosened regulations in 2020. Since 2019, the County has issued an average of 35 building permits for ADUs:

- 2019 – 37 building permits issued
- 2020 – 32 building permits issued
- 2021 – 35 building permits issued

Assuming the annual average of 35 ADU permits per year since 2019, the County is projecting 280 ADUs being permitted over the eight-year planning period and is using ABAG's survey data to distribute the projected units by income category as shown in Table H-4.4.

Table H-4.4: Projected ADUs during 6th Cycle Planning Period

	RHNA Unit Credits by Income Level				
	Very Low	Low	Moderate	Above Moderate	Total
Assumed Affordability	30%	30%	30%	10%	--
Projected ADUs	84	84	84	28	280

Based on these calculations, the County is able to meet approximately 705 of its RHNA through credit units and ADUs, and must accommodate another 2,864 units on the sites detailed in the sites inventory (Table H-4.5).

[6] https://abag.ca.gov/sites/default/files/documents/2022-03/ADUs-Projections-Memo-final.pdf

Table H-4.5: Remaining Need After Credit and ADU Units

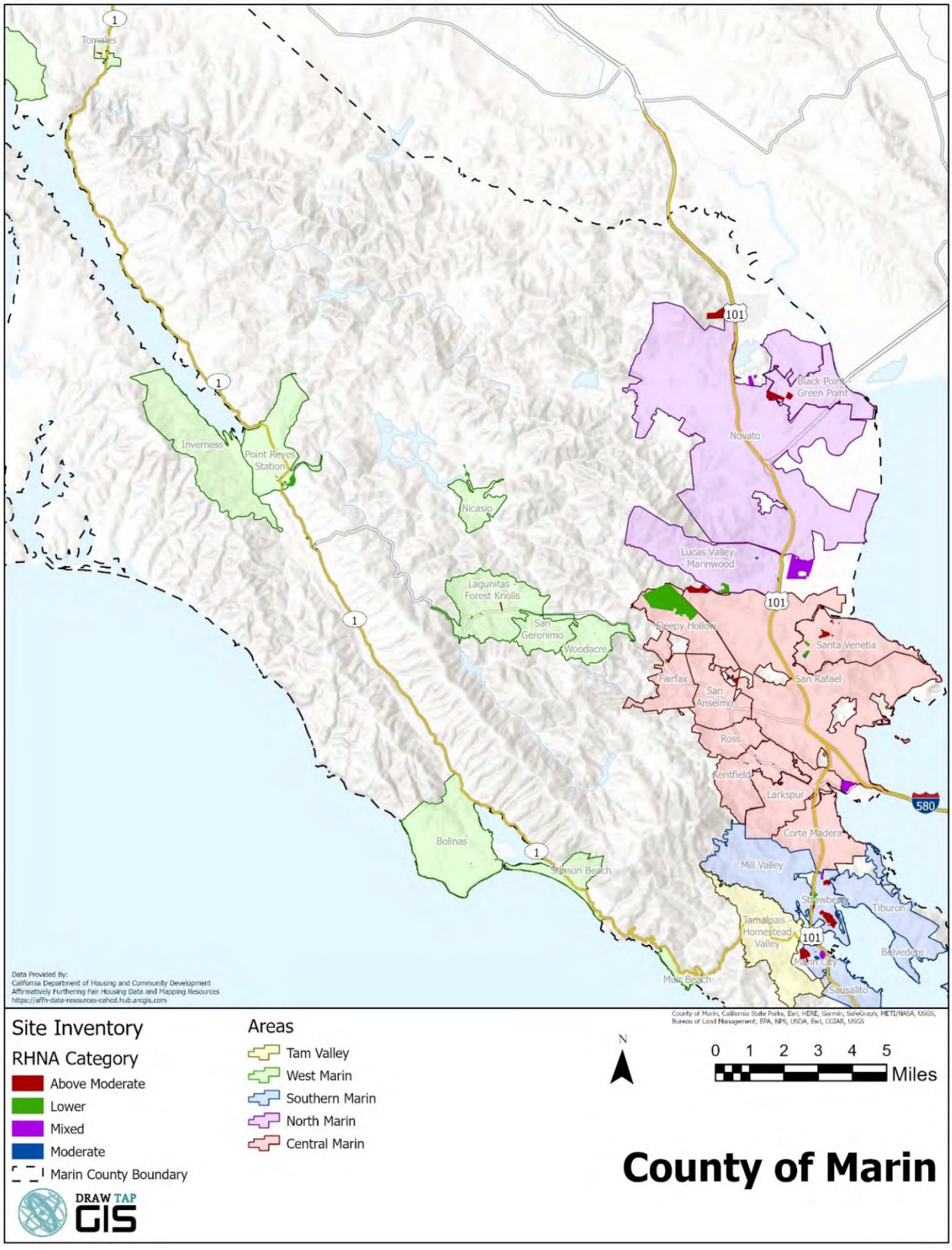
	Housing Units by RHNA Income Categories				Total
	Very Low	Low	Moderate	Above Moderate	
RHNA	1,100	634	512	1323	3,569
Approved/Entitled (Credits)	39	164	115	107	425
Accessory Dwelling Units	84	84	84	28	280
Total Credits + ADU	123	248	199	135	705
Remaining Need	977	386	313	1,188	2,864

Sites Inventory

Government Code Section 65583.2(c) requires that local jurisdictions determine their realistic capacity for new housing growth by means of a parcel-level analysis of land resources with the potential to accommodate residential uses. The analysis of potential to accommodate new housing growth considered physical and regulatory constraints, including: lot area and configuration, environmental factors (e.g. slope, sensitive habitat, flood risk), allowable density, and other development standards such as parking requirements and building height limits.

The following summarizes the methodology to identify available sites with near-term development potential pursuant to State adequate sites standards and to the calculate the potential housing units for the Marin County 6th Cycle Housing Element is found in Appendix C. The County identified six types of sites and assessed their suitability for development as described below. Figure H-4.2 illustrates the general location of these sites. Detailed sites information is included in Appendix C: Sites Inventory.

Figure H-4.2: Sites Inventory by RHNA Income Category



Realistic Capacity

Consistent with HCD Guidelines, the methodology for determining realistic capacity on each identified site must account for land use controls and site improvements. The Residential Multiple Planned (RMP) and Residential Commercial Multiple Planned (RCMP) designations allow residential development at a density of 20 to 45 units per acre. Based on the intensity of designations and the potential for the development of non-residential uses, the realistic capacity assumptions are set forth as follows:

- **Residential, Multi-Family Planned (RMP).** The RMP designation provides locations for multi-family residential development at densities from 20 to 30 units per acre. To account for land use controls, infrastructure capacity environmental constraints, and site improvements, realistic capacity is calculated based on a 20% reduction on the maximum allowable density, 16 units per acre for maximum density at 20 units per acre, or 24 units per acre for maximum density at 30 units per acre. This is a conservative estimate; more recent multi-family, affordable developments in Marin County have exceeded this density estimate. On a site-by-site basis, this realistic capacity may even be lower due to slope, wildfire, sea-level rise, and natural resource constraints. Sites with no access to sewer infrastructure but require septic systems with leach field, are applied densities at 20 units per acres. The Walnut Place affordable housing project, located in Point Reyes Station, includes 24 units built on 1.5-acre property (built density is 17 dwelling units per acre). . A portion of the property land area is devoted to the septic leach field. The use of 20% reduction of the maximum density, plus additional reductions based on physical constraints establishes conservative density estimate for projects within the County.

- **Residential/Commercial Multiple, Planned (RMPC).** The RMPC designation provides for a mix of residential and non-residential uses on a single development site, with an emphasis on high-density residential uses. All-residential developments are allowed, and non-residential uses are allowed in a subordinate capacity. The RMPC designation has a density of 20 of 45 dwelling units per acre. Because RMPC allows for combined residential/non-commercial uses in a manner that protects the maximum density and facilitates development of affordable units at higher densities, a 24-unit per acre realistic capacity is feasible. In larger commercial center under the RMPC, realistic capacity was calculated by identifying a portion of the center that could accommodate residential units. In many cases, the analysis included identifying parking areas, vacant lots, vacant buildings, or underutilized buildings that could be redeveloped into residential units.

Vacant Sites

Vacant sites are sites with no buildings, structures, or improvements (e.g., parking lots or storage facilities). Vacant sites include parcels that were identified as unimproved properties by the County Assessor data. To identify vacant sites that could be developed for housing development, a constraints analysis was conducted to yield realistic sites that could be developed into housing by either removing sites entirely or reducing a portion of the site that cannot be developed.

Vacant sites that were excluded as potential housing sites include sites with agricultural zoning designations or that are under Williamson Act contracts within rural areas, are under habitat conservation easements or ownership to protect natural resources or recreational access, include extensive environmental constraints, are sites not located near community services, or very small infeasible sites.

Many vacant sites include steep terrain and natural resource constraints to development, including wetlands, wildfire areas, susceptibility to sea-level rise, ridge and upland greenbelt, and stream conservation areas. Sites with significant constraints were reduced in development capacity by removing constrained areas and identifying the developable portions of the site that could accommodate clustering of housing units. Based on existing environmental context and constraints, and to produce a realistic housing count, these sites were reduced in capacity by 25% to 75%. Each site capacity percentage varies based on the extent of the constraint.

Sites identified in rural or inland areas that do not have access to sanitary sewer facilities were reduced in density to accommodate on-site wastewater treatment. These sites do not have densities that exceed 20 dwelling units per acre.

Overall, 24 vacant sites are included in the sites inventory. However, only 25 lower income units can be accommodated on vacant sites. The total number of lower income units that can be accommodated by vacant sites, ADU construction, and credit units is 332 units, or 19.1% of the County's 1,734 lower income RHNA. Therefore, approximately 80% of the County's lower income RHNA must be accommodated on non-vacant sites.

Underutilized Residential Sites

Underutilized residential sites are residential properties that are considered underutilized (e.g., older buildings that have not been improved in many years based on Marin County Assessor building and land assessed values) or have the zoning potential for additional residential units. The analysis does not consider potential SB9 units or ADUs beyond those projected above.

All sites selected for Underutilized Residential Sites include only one existing unit, have a building-to-land value ratio less than 2.00, include lots one acre in size or larger, and have existing residential main buildings built prior to 1980. Sites with residential buildings older than 1940 or structures 80 years or older were also removed for historical considerations. This threshold was applied under the assumption to remove

the oldest structures that could be replaced or developed by new housing development. In some cases, buildings that could be rehabilitated or adaptively reused for housing were considered.

Underutilized sites within the Baylands and City Center areas were designated as multi-family or mixed-use designation with a density of 30 dwelling units per acre. If the sites fall within the 0.5- to 10-acre range, they were designated as a Lower income site. Underutilized sites within Coastal and Inland areas were designated between 7.3 to 15 dwelling units per acre. These sites were designated for Moderate to Above Moderate income categories.

Environmental constraints were factored into the sites. If there were sea-level rise, steep terrain, natural resources, or wildfire constraints, a lower realistic development percentage was applied. Sites with wildfire constraints averaged 52% reduction of the development capacity. Housing sites that included sea-level rise constraints averaged a 60%reduction of the housing capacity. Sites with natural resources constraints, such as wetlands or adjacent to natural streams, typically averaged a 53% reduction of development capacity. Sites with steep terrain constraints, with slopes greater than 10 percent, typically averaged a 65 reduction of development capacity.

Underutilized Nonresidential Sites

Underutilized nonresidential sites are sites with commercial, office, or similar uses that are considered underutilized (e.g., older buildings that have not been improved in many years based on Marin County Assessor building and land assessed values) and are not meeting their full economic or land use potential.

For large commercial shopping centers, sites have been identified by selecting areas that have the potential for housing development. Large parking areas or commercial buildings with vacancies were identified for redevelopment. Based on the developable areas, these sites were reduced in capacity by 15% to 85%. This reduction allows for commercial uses to remain under mixed use development. The reductions vary by each commercial center.

County or Public Site

County or public sites are publicly owned sites that are currently underutilized or vacant and could accommodate residential development. Sites with public ownership were identified, including properties owned by Marin County and the State of California. Both sites (052-041-27 Shoreline Highway and 018-152-12 Sir Francis Drake Boulevard) owned by the State of California are identified as excess state-owned property that could be potentially suitable for affordable housing development. Sites with development opportunities were selected and counted for housing sites. Vacant site capacities were calculated with a 20% to 50% reduction based on constraints (e.g., terrain). Some sites were identified as underutilized and have a portion of the property available for housing development and only those areas were counted.

Religious Institution

Religious institutions sites are sites with churches or other religious institutions, with excess vacant property or large parking lots, that could accommodate residential development. Only the portion of the vacant or parking area is used as a candidate housing site. All religious properties in the unincorporated county were reviewed. Sites with the largest parking areas or surrounding vacant areas were selected or that could yield at least a half an acre when half of the property was calculated. In rural and inland areas, vacant lots appear to be used as parking areas. Half of the parking lot or vacant area (50 percent) was calculated toward housing units. Vacant areas with terrain constraints were either excluded or not selected from the analysis.

School Site

School sites are properties with schools, with underutilized or unused areas, or sites considered surplus by the school district that could accommodate residential development. Only the portion of the site considered underutilized or unused, or the entire "surplus" site, is considered a candidate housing site. Additionally, some school sites include buildings or recreational amenities that could or are currently being used as neighborhood amenities. These buildings and facilities were removed from the housing calculation analysis. Some school sites have development potential limited by environmental constraints such as flooding, sea-level rise, and terrain. Based on existing environmental context and constraints, and to produce a realistic housing count, these sites were reduced in capacity by 15% to 75% and vary by each site.

Sites Summary

The County has identified a total of 3,235 units through a combination of vacant, underutilized residential sites, underutilized nonresidential sites, County and public sites, religious institution sites, and school sites. In combination with the 425 credit units (approved/entitled projects), the County's total sites inventory has 3,660 units, including 1,840 lower income, 515 moderate income, and 1,305 above moderate income. A detailed parcel by parcel summary is in Appendix C.

Table H-4.6: Sites Inventory by Community

Community	Lower	Moderate	Above Moderate	Total
Almonte	72	-	36	108
Blackpoint	-	-	111	111
California Park	25	-	85	110
Forest Knolls	-	-	10	10
Kentfield	130	92	3	225
Lagunitas	32	10	4	46
Lucas Valley	138	-	-	138
Lucas Valley Environs	-	-	26	26
Marin City	-	117	75	192
Marinwood	125	10	-	135
Nicasio	16	-	-	16
North Novato	109	38	249	396
Olema	20	31	5	56
Pt. Reyes Station	149	3	4	156
San Geronimo Village	-	15	-	15
Santa Venetia	121	13	47	181
Sleepy Hollow	70	4	54	128
St. Vincent's	440	-	240	680
Stinson Beach	-	-	13	13
Strawberry	100	8	189	297
Tamalpais	20	12	-	32
Tomales	44	27	47	118
Unincorporated Fairfax	36	-	-	36
Woodacre	-	10	-	10
SubTotal	*1,637*	*400*	*1,198*	*3,235*
Credit Sites				
Almonte	-	-	10	10

Table H-4.6: Sites Inventory by Community

Community	Lower	Moderate	Above Moderate	Total
Bolinas	13	-	-	13
California Park	1	-	8	9
Marin City	74	-	-	74
San Quentin	115	115	-	230
Strawberry	-	-	89	89
Subtotal	*203*	*115*	*107*	*425*
Total	1,840	515	1,305	3,660

The County has a RHNA shortfall of 2,864 units, as shown in Table H-4.2. Table H-4.7 shows the breakdown of the RHNA sites requiring rezone and not requiring rezone by income level. To accommodate the City's remaining shortfall RHNA, the County needs to rezone 1,349.3 acres (129 parcels) that could allow for potentially 3,210 units. Table H-4.8 shows a breakdown of the rezone RHNA units by existing zoning, acreage, number of sites, and RHNA units.

Table H-4.7: Sites Requiring Rezone by Income Level

	Lower	Moderate	Above Moderate	Total
Sites requiring rezone	1,637	400	1,173	3,210
Sites not requiring rezone	-	-	25	25
Total	1,637	400	1,198	3,235

Table H-4.8: Rezoning for RHNA

Existing Zoning	Acreage	Parcels	RHNA Units
Admin and Professional	1.7	1	13
Agriculture and Conservation	200.0	2	275
Agriculture Limited	290.8	11	904
Agriculture Residential Planned	93.3	4	140
Limited Roadside Business	3.3	5	76
Open Area	31.4	1	50
Planned Commercial	30.9	9	365
Public Facilities	45.6	7	224
Residential Agriculture	11.2	3	31
Residential Commercial Multiple Planned	19.4	19	237
Residential Multiple Planned	564.4	13	221
Residential Single Family	12.1	15	175
Residential Single Family Planned	24.1	16	255
Resort and Commercial Recreation	2.2	1	36
Retail Business	1.6	2	36
Village Commercial Residential	17.3	20	172
Total	**1,349.3**	**129**	**3,210**

Local Funding Opportunities

Affordable Housing Trust Fund

The County's Affordable Housing Trust Fund was established in 1980 by Resolution 88-53, along with the inclusionary housing program. Projects throughout Marin County, which serve low, very low and extremely low income households, are eligible for funding, but priority is given to rental projects located in the unincorporated County that serve the lowest income levels. Funding is to be used for land and property acquisition, development, construction, or preservation of affordable units. Applications are submitted to the Community Development Agency, and staff makes funding recommendations to the Board of Supervisors as grant requests are received. The Affordable Housing Trust Fund is primarily funded through residential in-lieu fees, commercial linkage fees, and, since 2009, the Affordable Housing Impact Fee (discussed later in this Chapter). In recent years, the Board of Supervisors has allocated $250,000 annually from the general fund to the Affordable Housing Trust Fund. In the last twenty years, the Housing Trust has been a major funder of every affordable housing development in the unincorporated County. During the Fifth Cycle Housing Element period (2013-2021), $13,545,980 from the Housing Trust Fund was dispersed and helped develop 120 units and rehabilitate 83 units. As of April 30, 2022, the Fund's balance is $10,822,352.60

Restricted Affordable Housing Fund

The Community Development agency also oversees this fund, which resulted from the excess funds of mortgage revenue bonds. The Restricted Affordable Housing Fund may be used solely for the purposes of residential development or preservation for low and moderate income households. Eligible projects shall include ones that create new affordable units through new construction, or through acquisition and/or rehabilitation of existing structures, or that preserve existing affordable housing units threatened by expiration of affordability restrictions, or market forces. As of April 30, the Funds balance is $2,241,808.47.

Priority Development Areas

Marin County is participating in the FOCUS regional planning initiative facilitated by the Association of Bay Area Governments (ABAG) and the Metropolitan Transportation Authority (MTC). Two areas within the unincorporated county, within one-half mile of Highway 101, have been designated as Priority Development Areas (PDAs): Cal Park and Marin City. The objectives of the program are to foster the valuable relationship between land use and transportation and to promote compact land use patterns. Funding is available periodically through regional sources for housing projects or planning activities within PDAs.

HUD Community Planning and Development Grants

The County is the lead agency for purposes of receiving HUD Community Planning and Development entitlement grants on behalf of all jurisdictions within the County. Annually the County receives approximately $1.6 million in Community Development Block Grants (CDBG) and $800,000 in HOME Investment Partnership (HOME) funds for a variety of housing and community development activities.

The CDBG program provides funds for a range of community development projects that benefit low- to moderate-income people. The program can fund a variety of activities such as: acquisition and/or disposition of real estate or property, public facilities and improvements, public services, relocation, rehabilitation of housing, and homeownership assistance.

HOME funds can be used for activities that provide affordable housing opportunities for low to moderate income households, such as development of new affordable units, owner-occupied housing rehabilitation, homebuyer assistance, and tenant-based rental assistance. The County uses HOME funds to gap-finance affordable housing projects throughout the County. However, the County has signed a voluntary agreement to avoid an overconcentration of affordable units in areas of minority concentration, including Marin City and the Canal neighborhood.

Permanent Local Housing Allocation (PLHA)

In 2017, Governor Brown signed a 15-bill housing package aimed at addressing the State's housing shortage and high housing costs. Specifically, it included the Building Homes and Jobs Act (SB 2, 2017), which establishes a $75 recording fee on real estate documents to increase the supply of affordable homes in California. Because the number of real estate transactions recorded in each county will vary from year to year, the revenues collected will fluctuate.

The first year of SB 2 funds are available as planning grants to local jurisdictions. For the second year and onward, 70% of the funding will be allocated to local governments for affordable housing purposes. A large portion of year two allocations will be distributed using the same formula used to allocate federal Community Development Block Grants (CDBG). SB2 PLHA funds can be used to:

- Increase the supply of housing for households at or below 60% of AMI
- Increase assistance to affordable owner-occupied workforce housing
- Assist persons experiencing or at risk of homelessness
- Facilitate housing affordability, particularly for lower and moderate income households
- Promote projects and programs to meet the local government's unmet share of regional housing needs allocation

The County anticipates receiving between $750,000 to $1,500,000 in PLHA annually and has committed funds to projects for allocations received to date.

Opportunities for Energy Conservation

Housing elements are required to identify opportunities for energy conservation. Since the deregulation of energy companies in 1998, the price of energy has skyrocketed. With such an increase in prices, energy costs can account for a substantial portion of housing costs. There are a number of programs offered locally, through the local energy distributor (PG&E), Marin's own clean energy provider (MCE Clean Energy), the Bay Area Regional Energy Network (BayREN), and through the State of California that provide cost-effective energy savings. The County makes information regarding energy conservation available to the public on its website.[1]

Effective energy conservation measures built into or added to existing housing can help residents manage their housing costs over time and keep lower income households' operating costs affordable. There are several significant areas in which the County of Marin is encouraging energy conservation in new and existing housing:

- All residential projects requiring discretionary planning review must comply with the County's green building ordinance which includes additional energy efficiency measures.
- The Housing Rehabilitation Loan Program assists low income owners in the rehabilitation of older housing units, which can include energy efficiency improvements.
- The County has sponsored various incentives, such as free solar and green building technical assistance programs that assist owners in converting to green energy technologies and green building techniques.
- Land use policies in the 2007 Countywide Plan promote more compact neighborhoods, encourage in-fill development, and promote cluster development.
- MCE Clean Energy and the BayREN offers tenants of multi-family properties. Homeowners, and renters of single-family units no-cost walk-through energy assessments to identify potential energy and cost savings opportunities and incentives to assist with energy upgrades to the common area and units. Additionally, both programs offer no-cost energy savings kits for residents that include LED lamps, smart power strips, faucet aerators, and more.
- The County-led Electrify Marin program offers free technical assistance and rebates to encourage homeowners to replace natural gas burning appliances such as space and water heating and cooking appliances with high efficiency electric units. The replacement units use less energy and improve the indoor air quality of the home. The Electrify Marin rebates can also be combined with

[1] https://www.marincounty.org/residents/environment/conservation-and-energy

incentives provided by BayREN and the state.

- The BayREN Home+ program provides single family homeowners no-cost technical assistance and rebates for energy efficiency and electrification projects. Measures eligible for rebates include insulation, air sealing, duct sealing/replacement, and HVAC and water heater upgrades.
- MCE Clean Energy offers an income-qualified single family energy efficiency program. MCE Home Energy Savings program provides income-qualifying residents with free in-person or virtual home energy assessments, free upgrade projects including attic insulation, gas furnace replacement, and water heater replacement, and a complimentary energy-saving toolkit. Income guidelines are set at 200% to 400% above federal poverty line.
- Peninsula Energy Services is the current provider in Marin for the federally funded Low-Income Heating and Energy Assistance Program (LIHEAP). LIHEAP provides no-cost weatherization and other energy efficiency home improvements to income-qualified residents. LIHEAP income guidelines are up to 200% federal poverty line.
- MarinCAN is a community-driven campaign to dramatically reduce greenhouse gas (GHG) emissions, prepare for climate change impacts, and meaningfully address and integrate equity. MarinCAN works with Marin County residents, businesses, organizations, agencies, and local governments to design and implement local climate change solutions in 6 Focus Areas: Renewable Energy, Transportation. Buildings and Infrastructure, Local Food and Waste, Carbon Sequestration. Climate Resilient Communities.
- Energy Efficiency Programs for Renters: People who rent their homes face challenging barriers when it comes to making energy efficiency improvements. Most projects that require a building permit (furnace, water heater, or window replacement, insulation upgrades, and more) also require property owner approval. Additionally, most renters do not want to pay for property improvements to a home they do not own. The County encourages renters to have discussions about equipment upgrades and share resources with their property owners. For these types of upgrades, the County recommends renters inform their property owners of rebate program opportunities when discussions are being held around replacing old equipment. The MCE Clean Energy and BayREN energy savings kits programs are open to renters in single family homes.

Through these and other conservation measures, the County seeks to help minimize the proportion of household income that must be dedicated to energy costs, as well as to minimize the use of nonrenewable resources.

CHAPTER 5: GOALS, POLICIES, AND PROGRAMS

Overview

State law requires each jurisdiction to address how it will satisfy the objectives for new residential units as represented by the Regional Housing Needs Allocation (RHNA). Means of achieving the development of these units should be outlined through policies and programs in the Housing Element.

Marin County's housing policies and programs have been revised to reflect the major themes identified through the County's community outreach process and a critical evaluation of the programs and policies from the 2015 Housing Element (found in Appendix B: Evaluation of 2015 Housing Element Programs). Implementing programs are grouped by the housing goals described below. Additionally, under State law to Affirmatively Furthering Fair Housing (AFFH), policies and programs must be examined under the lens of affirmatively furthering fair housing and a commitment to specific meaningful actions (Appendix D: Affirmatively Furthering Fair Housing).

Goal 1: Use Land Efficiently

Use Marin's land efficiently to meet housing needs and implement smart and sustainable development principles.

Goal 2: Meet Housing Needs through a Variety of Housing Choices

Respond to the broad range of housing needs in Marin County by supporting a mix of housing types, densities, affordability levels, and designs.

Goal 3: Ensure Leadership and Institutional Capacity

Build and maintain local government institutional capacity and monitor accomplishments to respond to housing needs effectively over time.

Goal 4: Combat Housing Discrimination, Eliminate Racial Bias, Undo Historic Patterns of Segregation

Lift barriers that restrict access in order to foster inclusive communities and achieve racial equity, fair housing choice, and opportunity for all Californians.

Policies are organized around these four central goals, with an emphasis on facilitating development of housing affordable to lower and moderate income households in Marin. Strategies to aid in achieving these goals include:

- Provide clear standards and incentives for affordable and special needs housing developments to minimize risk and costs to funders and developers.
- Minimize discretionary review; streamline the permitting process.
- Establish programs appropriate to various Marin locations (urban vs. rural) and be responsive to the needs of communities.

These ideas have been carried through in the Housing Element update to be implemented with a series of programs.

Upon adoption, the County will provide the Housing Element to all water and sewer service districts and notify all districts of the requirement to prioritize water and sewer service allocation for new affordable housing development (Government Code Section 65589.7).

Goals and Policies

Housing Goal 1: Use Land Efficiently

Use Marin's land efficiently to meet housing needs and to implement smart and sustainable development principles.

Policy 1.1: Land Use

Enact policies that encourage efficient use of land to foster a range of housing types in our community.

Policy 1.2: Regional Housing Needs Assessment

Maintain an adequate inventory of residential and mixed-use sites to fully accommodate the County's RHNA by income category throughout the planning period.

Policy 1.3: Housing Sites

Recognize developable land as a scarce community resource. Protect and expand the supply and residential capacity of housing sites, particularly for lower income households.

Policy 1.4: Development Certainty

Promote development certainty and minimize discretionary review for affordable and special needs housing through amendments to the Development Code.

Policy 1.5: Design, Sustainability, and Flexibility

Enact programs that facilitate well designed, energy efficient development and

flexibility of standards to encourage outstanding projects.

Housing Goal 2: Meet Housing Needs through a Variety of Housing Choices

Respond to the broad range of housing needs in Marin County by supporting a mix of housing types, densities, affordability levels, and designs.

Policy 2.1: Special Needs Groups

Expand housing opportunities for special needs groups, including seniors, people living with disabilities (including mental, physical, and developmental disabilities), agricultural workers and their families, individuals and families experiencing homelessness, single-parent families, large households, lower income (including extremely low-income) households, and other persons identified as having special housing needs in Marin County.

Policy 2.2: Supportive Services

Link housing to Department of Health and Human Services programs in order to coordinate assistance to people with special needs.

Policy 2.3: Workforce Housing

Implement policies that facilitate housing opportunities to meet the needs of Marin County's workforce, especially those earning lower incomes.

Policy 2.4: Incentives for Affordable Housing

Continue to provide a range of incentives and tools to ensure development certainty and cost savings for affordable housing providers.

Policy 2.5: Preserve Existing Housing

Protect and enhance the housing we have and ensure that existing affordable housing remains affordable and residents are not displaced.

Policy 2.6: Preserve Permanent Housing Inventory

Preserve our housing inventory for permanent residential uses. Discourage or mitigate the impact of short-term rentals and units unoccupied for extended periods of time.

Housing Goal 3: Ensure Leadership and Institutional Capacity

Educate the community regarding the need for a diverse and balanced inventory of housing to further equal access to housing opportunities. Build and maintain local government institutional capacity and monitor accomplishments to respond to housing needs effectively over time.

Policy 3.1: Community Participation

Maintain an open channel of communications among the community, County staff, and decision makers. Ensure inclusive and meaningful efforts are undertaken to obtain input from diverse groups in the community. When needed, employ additional efforts to include those that are typically excluded or under-represented.

Policy 3.2: Coordination

Take a proactive approach in local housing coordination, policy development, and communication. Share resources with cities and towns and other agencies to effectively create and respond to opportunities for achieving housing goals.

Policy 3.3: Research, Monitoring, and Evaluation

Perform effective management of housing data relating to Marin County housing programs, production, and achievements. Monitor and evaluate housing policies on an ongoing basis and respond expeditiously to changing housing conditions and needs of the population over time.

Policy 3.4: Funding

Actively and creatively seek ways to increase funding resources for affordable and special needs housing.

Housing Goal 4: Combat Housing Discrimination, Eliminate Racial Bias, Undo Historic Patterns of Segregation

Lift barriers that restrict access in order to foster inclusive communities and achieve racial equity, fair housing choice, and opportunity for all local workers and current and future residents of Marin.

Policy 4.1: Tenant Protection

Implement policies and actions to protect tenants from unlawful evictions as well as direct and indirect (economic) displacement, and to promote greater education around tenants' rights.

Policy 4.2: Fair Housing Outreach and Education

Proactively conduct outreach and educate the community about fair housing rights and responsibilities.

Policy 4.3: Affirmatively Further Fair Housing

Ensure that the County's land use, development, and housing policies further the goal of equal access to housing opportunities.

Implementing Programs

A housing program can implement more than one goal and multiple policies. Furthermore, some programs and actions may target specific areas of implementation in order to bridge existing service gaps, access to resources, and disproportionate housing needs.

Housing Supply

Program 1: Adequate Sites for RHNA and Monitoring of No Net Loss

The County of Marin has been allocated a need of 3,569 units (1,100 very low income, 634 low income, 512 moderate income, and 1,323 above moderate income units). Based on projected ADUs and entitled projects, the County has met 705 of its RHNA, with a remaining RHNA of 2,864 units (1,343 lower income, 313 moderate income, and 1,208 above moderate income units).

To accommodate this remaining RHNA, the County has identified an inventory of sites with potential for redevelopment over the eight-year planning period. The inventory includes sites that are not identified for rezone and can accommodate 25 additional units under current Countywide Plan (CWP) and Development Code. The inventory also includes sites that will be rezoned/upzoned concurrent with this Housing Element update. Sites identified for rezoning/upzoning can accommodate 3,210 units (see Table H-5.1). The County is committed to redesignating and rezoning accordingly by January 31, 2023. Appendix C contains a detailed parcel listing of properties in the inventory, including those that will be redesignated/rezoned concurrent with the Housing Element update.

Five sites in the inventory are over 10 acres in size. In Marin County, development of lower income affordable housing on large sites is achievable and there is interest in redeveloping larger sites. Zoning amendments, including the designation of a HOD combining district zoning have been applied to each larger property, allowing higher density development on the most developable areas of the properties, selecting out natural constraints or other factors. In many cases, the limited developable area for higher density is under 10 acres.

To facilitate the development of these large sites, the County will:

- Incentivize multi unit development through ministerial review.
- Provide site planning tools such as clustered development within the Form Based Code.
- Meet with property owners and developers to encourage the development of mixed income housing with a mix of unit sizes, types, and prices.

- Allow the development in phases within the eight-year Housing Element Planning period.

Table H-5.1: Summary of Areas to be Rezoned

Existing Zoning	Acreage	Parcels	RHNA Units
Admin and Professional	1.7	1	13
Agriculture and Conservation	200.0	2	275
Agriculture Limited	290.8	11	904
Agriculture Residential Planned	93.3	4	140
Limited Roadside Business	3.3	5	76
Open Area	31.4	1	50
Planned Commercial	30.9	9	365
Public Facilities	45.6	7	224
Residential Agriculture	11.2	3	31
Residential Commercial Multiple Planned	19.4	19	237
Residential Multiple Planned	564.4	13	221
Residential Single Family	12.1	15	175
Residential Single Family Planned	24.1	16	255
Resort and Commercial Recreation	2.2	1	36
Retail Business	1.6	2	36
Village Commercial Residential	17.3	20	172
Total	**1,349.3**	**129**	**3,210**

To ensure that the County complies with Government Code Section 65863 (No Net Loss), the County will monitor the use of residential and mixed-use acreage included in the sites inventory to ensure an adequate inventory is available to meet the County's RHNA obligations throughout the planning period. To ensure sufficient residential capacity is maintained to accommodate the RHNA, the County will develop and implement a formal, ongoing, project-by-project evaluation procedure pursuant to Government Code Section 65863. Should an approval of development result in a reduction of residential capacity below what is needed to accommodate the remaining need for households at an income level, the County will identify replacement sites as part of the findings for project approval, or if necessary, rezone sufficient sites to

accommodate the shortfall and ensure “no net loss” in capacity to accommodate the RHNA within six months.

Specific Actions and Timeline	▪ Complete redesignation/rezoning of 1,352.5 acres as outlined in Table H-5.1 to fully accommodate the RHNA. Redesignation and rezoning for adequate sites is being taken concurrently with the Housing Element update and to be completed concurrent with or prior to Housing Element adoption before January 31, 2023 (completed). Specifically, the County will completely revamp the Housing Opportunity sites (HOD) policy language in the CWP to outline: o Allowable density o Maximum and minimum number of units o Site constraints if any o Objective Design Standards category ▪ By January 31, 2023, amend the CWP to adjust the Inland Rural/City-Center corridor boundary and to ensure consistency between CWP and zoning districts. (Completed) ▪ Ongoing, maintain an inventory of the available sites for residential development and make it available on County website. Update sites inventory annually to reflect status of individual sites. ▪ By January 2024, implement a formal evaluation procedure pursuant to Government Code Section 65863 to monitor the development of vacant and nonvacant sites in the sites inventory and ensure that adequate sites are available to meet the remaining RHNA by income category. ▪ By the end of 2024, update the Local Coastal Plan to be consistent with the CWP. ▪ Meet with property owners of large sites at least annually to facilitate development of housing on site.
Primary Responsible	Housing

Departments	
Funding Sources	General Fund
Relevant Housing Policies	1.1, 1.2, and 1.3

Program 2: By Right Approval

Pursuant to Government Code Section 65583.2, reusing the following types of sites in the County's sites inventory for lower income RHNA are subject to by-right approval exempt from CEQA and subject only to design review based on objective standards, when a project includes 20 percent of the units affordable to lower income households and no subdivision is proposed:

- Vacant sites that were identified in the County's 4th and 5th cycles Housing Element as sites for lower income RHNA; and
- Nonvacant sites that were identified in the County's 5th cycle Housing Element as sites for lower income RHNA.

Parcels that are subject to by-right approval pursuant to State law are identified in Appendix C.

In addition, the County may consider expanding the scope of streamlining:

- For sites not subject to Section 65583.2 - projects that include 20 percent of the units affordable to homeowners at 60 percent AMI or to renters at 50 percent AMI; and/or
- 100 percent affordable projects on any Housing Element sites.

Specific Actions and Timeline	▪ By January 31, 2023, concurrent with the Development Code and CWP update to provide adequate sites for RHNA (see Program 1), update the Development Code to address the by-right approval requirements.
Primary Responsible Departments	Planning
Funding Sources	General Fund
Relevant Housing Policies	1.3 and 1.4

Program 3: Replacement Housing

Development on all nonvacant sites designated in the Housing Element, at all income levels, that contain existing residential units, or units that were rented in the past five years, is subject to the replacement housing requirements specified in Government Code sections 65583.2 and 65915.

Specific Actions and Timeline	▪ By January 31, 2023, as part of the redesignation and rezoning being undertaken concurrently with the Housing Element update (see Program 1, update the Development Code to address the replacement requirements).
Primary Responsible Departments	Planning
Funding Sources	General Fund
Relevant Housing Policies	1.1, 1.3, and 2.5

Program 4: Accessory Dwelling Units

Accessory Dwelling Units (ADUs) are an important resource to provide lower and moderate income housing in the unincorporated County. To facilitate ADU production, the County will:

- Dedicate a specific page on the County website to provide information and resources for ADU construction.
- Dedicate an ombudsperson position to help applicants navigate the pre-development phase of ADU construction.
- Develop an ADU construction guide to clarify the permit application process and requirements. The guide will outline the required review by various departments and fees required.
- Provide financial assistance to income-qualified property owners to build ADUs using State funds (such as Cal HOME funds).
- Develop incentives or strategies to encourage the use of ADUs as housing units (as opposed to pool houses, for example).
- Develop pre-approved plans for different unit sizes to facilitate the permitting process.

Specific Actions and Timeline	▪ Permit on average 35 ADUs or JADUs per year (280 ADUs or JADUs over eight years). ▪ Update ADU webpage semi-annually, or more frequently as needed, to ensure information addresses questions raised by applicants. ▪ By December 2023, create an ombudsperson position to help property owners navigate the ADU pre-development process. ▪ By December 2023, develop pre-approved plans for different ADU unit sizes. ▪ Annually, pursue and allocate financial incentives to support ADU construction with the annual goal of assisting 5 lower income households with ADU construction or deed restricting 5 ADUs as affordable housing. ▪ By the end of 2025, develop incentives or strategies to encourage the use of ADUs as housing units. ▪ By January 31, 2025 and every other year thereafter, review the production of ADUs to verify that Housing Element projections are accurate, including production level and affordability. If production estimates are below the estimates in the Housing Element, within six months of the review, revise the County's ADU strategies to help achieve overall goal of at least 280 ADUs during the planning period. Revised strategies may include alternative actions such as increased outreach, reduced fees, streamlined process, and/or rezone additional properties if a RHNA shortfall is resulted (see also Program 1 monitoring of no net loss requirements).
Primary Responsible Departments	Housing; Planning; Building; Environmental Health Services; Public Works
Funding Sources	General Fund; CalHome; Marin County Collaborative REAP
Relevant Housing Policies	1.3, 1.4, 2.4, and 3.4

Program 5: SB 9 Mapping Tool

SB 9 (Government Code Section 65852.21) is a new regulation that allows property owners to build additional units on their properties. In the unincorporated County, properties eligible to utilize SB 9 are limited to those in urbanized areas and in urban clusters, in addition to other exclusions included in the statute. However, opportunities may also exist in the coastal area. The County will facilitate the SB 9 process by developing a mapping tool to help property owners within the urbanized areas determine if their properties may be eligible to utilize SB 9 to add new units onsite. Furthermore, the mapping tool will be used to conduct feasibility of applying SB 9 within the coastal zone.

Specific Actions and Timeline	▪ By December 2023, develop and implement an online mapping tool that will identify areas in the unincorporated area that are eligible to use SB 9. ▪ By mid-2024, conduct feasibility of applying SB 9 within the coastal zone. If feasible, consistent with the Coastal Act, amend SB 9 ordinance to include the coastal zone (or portions of).
Primary Responsible Departments	Housing; Planning; Public Works
Funding Sources	Marin County Collaborative REAP Funds
Relevant Housing Policies	1.1, 3.1, 3.2, and 3.3

Program 6: Efficient Use of Multi-Unit Land

The County permits single-unit homes in all residential zones and nonresidential zones that permit housing, potentially reducing the achievable density in multi-unit development. Establishing minimum densities will ensure efficient use of the County's multi-unit land and prohibit the construction of new detached single-unit homes on multi-unit zoned property. Existing single-unit homes on multi-unit zoned property can remain and limited expansion or improvement, or reconstruction to replace units damaged due to accidents or disasters would be permitted.

To facilitate efficient use of land, some jurisdictions have also established target densities (tied to the calculation of RHNA potential, for example) to ensure no net loss of capacity as development occurs.

Also, currently no conventional zones in the County permit multi-unit housing, and only ten percent of the parcels are zoned to permit multi-unit residential use. This limited land available solely for multi-unit use is a potential constraint to housing development.

Specific Actions and Timeline	▪ By December 2023, amend the Development Code to: o Establish minimum densities for multi-unit and mixed-use zones. o Specify the rounding up to the whole number in calculating density. ▪ By December 2023: o Explore and, if appropriate, develop target density for each zone. o Create a residential combining district that allows for form-based objective development standards rather than discretionary review.
Primary Responsible Departments	Planning
Funding Sources	General Fund
Relevant Housing Policies	1.1, 2.4, and 2.5

Program 7: Religious and Institutional Facility Housing Overlay

Government Code Section 65913.6 allows a religious institution to develop an affordable housing project at a place of worship owned by the religious institution even if the development requires the religious institution to reduce the number of religious-use parking spaces available. This bill applies only to religious facilities located in zones that allow residential uses.

The County will establish a Religious and Institutional Facility Housing Overlay with the following potential provisions:

- Expanding the provisions of Section 65913.6 to other institutional uses, such as schools and hospitals, as well as religious facilities located in zones that currently do not allow residential uses.
- Allowing religious and institutional uses to construct up to four ADUs and

JADUs onsite when an affordable housing development may not be feasible.

Specific Actions and Timeline	▪ Beginning in 2023, conduct outreach to religious and institutional facilities regarding the Overlay opportunity. ▪ By December 2024, establish a Religious and Institutional Facility Housing Overlay to extend the provisions of Section 65913.6 to other institutional and religious uses.
Primary Responsible Departments	Planning, Housing
Funding Sources	General Fund
Relevant Housing Policies	1.3 and 2.4

Program 8: Development Code Amendments

The County will amend the Development Code to address the following to facilitate development of a variety of housing types:

- **Residential Use in Mixed-Use Development:** - The County allows residential uses on the upper floors and residential units are limited between 25 and 29 percent of the floor area. Amend the Development Code to allow at least 50 percent of the floor area as residential use.
- **Height Limit:** The 30-foot height limit is potentially constraining to achieving a density of 30 units per acre. Amend the Development Code to increase the height limit to 45 feet.
- **Accessory Dwelling Units:** Currently, the County's ordinance does not allow an ADU to be sold or otherwise conveyed separately from the primary dwelling unit. However, State law makes an exception if the property is owned by a nonprofit organization. The County will amend the ADU regulations to be consistent with State law.
- **Agricultural Worker and Employee Housing:** The County's provisions for agricultural worker housing is not consistent with the State Employee Housing Act. Furthermore, the Development Code does not contain provisions for employee housing. Pursuant to the Employee Housing Act, any housing for six or fewer employees (in any industry) should be permitted as single-unit residential use. The County will amend agricultural worker provisions in the Development Code to be consistent with State law.

- **Residential Care Facilities:** The County permits residential care facilities for six or fewer persons in all residential zones. For residential care facilities for seven or more persons, a conditional use permit is required. The County will revise the Development Code to permit or conditionally permit large residential care facilities in all zones that permit residential uses, as similar uses in the same zone, and to ensure the required conditions for large facilities are objective and provide certainty in outcomes.
- **Transitional and Supportive Housing:** Pursuant to State law, transitional and supportive housing is to be considered a residential use to be similarly permitted as similar uses in the same zone. Currently, transitional and supportive housing is not specifically identified in the Coastal Zone in areas where residential uses are permitted or conditionally permitted. The Development Code will be amended to address the provision of transitional and supportive housing in the Coastal Zone.

  Pursuant to State law (Government Code Section 65650 et seq.), supportive housing developments of 50 units or fewer that meet certain requirements must be permitted by right in zones where mixed-use and multi-unit development is permitted. Additionally, parking requirements are prohibited for supportive housing developments within one half mile of a transit stop. The County will amend Title 24 of the Municipal Code to address the parking requirements to comply with State law (see Program 9).
- **Emergency Shelters:** Government Code Section 65583 requires that parking standards for emergency shelters be established based on the number of employees only and that the separation requirement between two shelters be a maximum of 300 feet. The County Development Code and Title 24 will be revised to comply with this provision.
- **Low Barrier Navigation Center (LBNC):** Government Code section 65660 et seq. requires that LBNCs be permitted by right in mixed-use and nonresidential zones that permit multi-unit housing. The Development Code will be amended to include provisions for LBNC.
- **Density Bonus:** The County adopted an ordinance in 2021 that was consistent with state density bonus law at that time. However, since then, there have been some additional statutory changes. The Development Code will be amended to address all recent changes to the State Density Bonus law.

Specific Actions and Timeline	▪ By December 2023, amend the Development Code and Title 24 as outlined above to facilitate a variety of housing types, especially for special needs populations.

Primary Responsible Departments	Planning, Department of Public Works
Funding Sources	General Fund
Relevant Housing Policies	1.1, 2.1, 2.3, and 2.4

Program 9: Parking Standards

The County's current parking standards are codified in Title 24 of the Municipal Code. The parking standards will be updated to address the following:

- **Parking for Multi-Unit Housing:** The County current standards are slightly higher than the standards established for the State density bonus program. The County will reduce the parking requirements to match the State density bonus requirements.
- **Supportive Housing:** Pursuant to State law (Government Code Section 65650 et seq.), parking requirements are prohibited for supportive housing developments of 50 units or fewer meeting certain requirements and located within one-half mile of a transit stop.
- **Emergency Shelters:** Government Code Section 65583 requires that parking standards for emergency shelters be established based on the number of employees only, not based on shelter capacity (such as number of beds).

Specific Actions and Timeline	▪ By December 2023, amend Title 24 of the Municipal Code to reduce parking requirements for multi-unit housing, and to revise parking requirements for supportive housing meeting certain criteria and emergency shelters.
Primary Responsible Departments	Public Works
Funding Sources	General Fund
Relevant Housing Policies	1.1 and 2.1

Program 10: Objective Development Standards for Off-Site Improvements

Development projects in the County are required to make on- and off-site improvements. The Objective Design Standards that the County has been working on impact only on-site improvements and cover a property up to the right of way. Many rural communities in the unincorporated areas do not have standardized requirements for off-site improvements (such as streetscape improvements), which can make development uncertain and add costs.

Specific Actions and Timeline	▪ By December 2025, establish objective development standards for off-site improvements.
Primary Responsible Departments	Housing; Planning; Public Works
Funding Sources	General Fund
Relevant Housing Policies	1.1 and 1.5

Program 11: Water and Sewer Availability

Availability of water is a significant constraint to housing development in the County and beyond. The County will pursue several strategies to mitigate this constraint to the extent feasible.

The State has a new requirement for county jurisdictions to take over very small water connections and wells (less than 20 connections). DPW has requested proposals for a development of a Marin County Drought and Water Shortage Risk Mitigation Plan that would include the small water districts and coordination with all other Marin Water districts. The Housing Division will work with DPW with the goal of issuing the RFP for the mitigation plan in 2025.

Specific Actions and Timeline	▪ Continue to promote sustainability strategies (such as water conservation and recycling). ▪ Beginning in 2023, collaborate with water service providers to conduct a strategic water supply assessment in 2023 to evaluate increased supply within Marin (e.g., increased reservoir capacity, new reservoir(s), increase use of recycled water, desalinization plant) and external to Marin (e.g., EBMUD, Russian River water).

	▪ Annually, pursue funding for infrastructure improvements to facilitate affordable housing development. ▪ Issue RFP for the Drought and Water Storage Risk Mitigation Plan in 2025. See also Program 12: Septic for Multi-Unit Housing. ▪ Upon adoption of the Housing Element, submit it to all water and sewer districts and notify all water and sewer districts of the requirement to prioritize water allocation for new affordable housing development (Government Code Section 65589.7).
Primary Responsible Departments	Housing, MMWD, NMWD, and major sewer service providers
Funding Sources	General Fund, State infrastructure funds
Relevant Housing Policies	1.5

Program 12: Septic for Multi-Unit Housing

Parts of the County have no sewer services, with properties relying on individual onsite septic systems. The County will pursue strategies to address this constraint to multi-unit development.

Specific Actions and Timeline	▪ In 2023 initiate a study to identify alternative approaches to sewage disposal (e.g., package plants, community systems, incinerator toilets, etc.). Upon completion of the study, update by 2024 the County's methodology for calculating septic capacity. ▪ In 2024, develop standards for multi-unit development in septic areas. ▪ Annually, pursue funding for infrastructure improvements to facilitate affordable housing development.
Primary Responsible Departments	Housing; Environmental Health Services

Funding Sources	General Fund
Relevant Housing Policies	1.5

Special Needs Housing

Program 13: Reasonable Accommodation

Reasonable Accommodation provides flexibility in the implementation of land use and development regulations in order to address the special housing needs of persons with disabilities. The review and approval process of Reasonable Accommodation requests may delay a person's ability to access adequate housing. The County will expedite Reasonable Accommodation requests. (See also Program 21: Rehabilitation Assistance for funding available to assist lower income households in making accessibility improvements.)

Specific Actions and Timeline	▪ Beginning in 2023, offer expedited review and approval of Reasonable Accommodation requests.
Primary Responsible Departments	Planning, Building and Environmental Health Services
Funding Sources	General Fund
Relevant Housing Policies	2.1 and 4.3

Program 14: Universal Design and Visitability

Universal design is the design of buildings or environments to make them accessible to all people, regardless of age, disability, or other factors. Universal design goes beyond ADA requirements but may add to the cost of construction. Typically, local governments incentivize the use of universal design principles.

Currently, visitability is a requirement for HUD-funded single-unit or owned-occupied housing. Visitability refers to housing designed in such a way that it can be lived in or visited by people who have trouble with steps or who use wheelchairs or walkers. The County may consider expanding the visitability requirement to multi-unit housing.

Specific Actions	▪ In 2024, study policies and/or incentives to encourage requirements for universal design and visitability, and

and Timeline	develop them by 2025 for implementation.
Primary Responsible Departments	Housing, Planning and Building
Funding Sources	General Fund
Relevant Housing Policies	2.1 and 4.3

Program 15: Housing for Farmworkers and Hospitality Workers

Agricultural operations represent an important component of the County's economic base. Most farming operations are small dairies, individually employing a small number of farmworkers. These farms often do not have the ability to provide housing for all their workers. Year-round fishery operations also employ a significant number of workers collectively. In addition, Marin County is a popular tourist destination. Farmworkers, fishery workers, and hospitality employees typically earn lower incomes and have limited affordable housing options. The County will explore policies that facilitate the provision of affordable housing for these workers. Potential considerations include:

- Setting aside a specific percentage of affordable housing units for farmworkers within larger affordable housing developments.
- Partnering with other jurisdictions, farm operators, hotels, and other hospitality employers in the region to contribute to an affordable housing fund or a community land trust. Funding collected can be used to acquire, develop, and/or rehabilitate housing for farmworkers.
- Requiring hospitality employers to provide housing to temporary employees during peak seasons.

Specific Actions and Timeline	▪ By December 2025, develop strategies for addressing farmworker and hospitality worker housing, with the goal of increasing housing for these employees by 20 percent. ▪ Annually convene with interested employers and affordable housing developers to pursue implementation of strategies for affordable housing and pursue funding at state and federal levels. ▪ In 2028, assess the effectiveness of strategies and modify

	the approach if necessary, by 2029.
Primary Responsible Departments	Housing
Funding Sources	General Fund
Relevant Housing Policies	2.1 and 2.3

Program 16: Project Homekey

The County is actively pursuing Project Homekey opportunities in order to provide permanent supportive housing for people experiencing homelessness. Homekey is an opportunity for the County to pursue funding for the development of a broad range of housing types, including but not limited to hotels, motels, hostels, single-family homes, multi-unit apartments, adult residential facilities, and manufactured housing, and to convert commercial properties and other existing buildings to permanent or interim housing for the homeless.

Specific Actions and Timeline	▪ In 2023, identify locations that may be appropriate as Project Homekey sites and conduct outreach to interested nonprofit developers to pursue funding from HCD. ▪ Pursue Project Homekey funding annually and if Project Homekey funds become unavailable, pursue other funding sources. ▪ Develop 20 units using Project Homekey over eight years.
Primary Responsible Departments	Housing; Health and Human Services
Funding Sources	HCD Project Homekey Funds; HOME; other affordable housing funds
Relevant Housing Policies	2.1, 2.2, and 4.3

Program 17: Housing for Seniors

The County has a high proportion of aging residents. Many have expressed the need for additional senior housing options, specifically allowing seniors to trade their current homes for other housing that requires less maintenance, is designed to accommodate the mobility needs of seniors, and is more affordable. The County will pursue a variety of housing options for seniors.

Specific Actions and Timeline	▪ In 2023, explore expansion of home match services to help match over-housed seniors with potential lower income tenants or other seniors to save on housing costs. ▪ In 2024, develop incentives and development standards to facilitate various senior housing options (such as senior apartments/homes, co-housing, assisted living, residential care, memory care, and board and care, etc.).
Primary Responsible Departments	Housing
Funding Sources	General Fund
Relevant Housing Policies	2.1 and 4.3

Preservation of Housing

Program 18: Short-Term Rentals

The County may explore options for limiting short-term rentals in all areas of the unincorporated County including West Marin that currently has a moratorium that is set to expire in 2024 in order to preserve housing units for permanent residential use. Strategies may include:

- Prohibiting short-term rentals (no less than 30 days allowed)
- Limiting the number of days the unit can be used for short-term rentals
- Prohibiting short-term rentals in all multi-unit dwellings
- Allowing for short-term rentals if the property is the owner's primary residence
- Benchmarking the number of short-term rentals allowed to no more than a specific percentage of the community's rental housing stock

Specific Actions and Timeline	▪ In 2024, evaluate and adopt strategies for regulating short-term rentals.
Primary Responsible Departments	Planning
Funding Sources	General Fund
Relevant Housing Policies	2.6 and 3.3

Program 19: Vacant Home Tax

The vacancy rate in the unincorporated County is about 10 percent with close to 60 percent of vacant units used for recreational, seasonal, and occasional purposes. Accessory Dwelling Units in more affluent portions of the unincorporated County are often not occupied as housing units. A vacant home tax is an emerging strategy for discouraging leaving homes unoccupied for extended periods of time.

Specific Actions and Timeline	▪ In 2024, study the feasibility of a vacant home tax as a strategy to discourage unoccupied housing units and increase revenue for affordable housing. If appropriate, pursue ballot measures in 2025 to establish tax.
Primary Responsible Departments	Housing
Funding Sources	General Fund
Relevant Housing Policies	2.6

Program 20: Monitoring of Rental Housing

The Marin County Landlord Registry was established in 2019 and requires landlords to report rents and general occupancy information for all rental properties subject to the Just Cause for Eviction ordinance. While the registry is designed to collect data on the rental market, the data provides an incomplete picture since a large portion of rental units are exempt from the Just Cause for Eviction ordinance.

Also, the County Development Code prohibits conversion of multi-unit rental units into

condominiums unless the vacancy rate exceeds five percent and the change does not reduce the ratio of multi-unit rental units to less than 25 percent of the total number of dwelling units in the County.

Specific Actions and Timeline	▪ Continue to implement the Landlord Registry and Condominium Conversion ordinance. ▪ In 2024, expand Landlord Registry requirements to cover all rental units in the unincorporated County.
Primary Responsible Departments	Housing
Funding Sources	General Fund
Relevant Housing Policies	3.3 and 4.1

Program 21: Rehabilitation Assistance

The County supports the housing rehabilitation needs of lower income households through:

- Residential Rehabilitation Loan Program: provides low-interest property improvement loans and technical assistance to qualified, very low income homeowners to make basic repairs and improvements, accessibility improvements, correct substandard conditions, and eliminate health and safety hazards.
- Funding assistance to Marin Center for Independent Living (MCIL) home modification program to increase independence and accessibility for renters and homeowners.

Specific Actions and Timeline	▪ Provide rehabilitation loans to 10 households annually (80 households over eight years). ▪ Provide support for 6 households to make accessibility improvements annually (48 households over eight years). ▪ Continue to support nonprofit organizations in providing rehabilitation assistance to lower income renters and homeowners.
Primary	Housing and Federal Grants

Responsible Departments	
Funding Sources	CDBG
Relevant Housing Policies	2.1, 2.5, 2.6, and 3.4

Program 22: Habitability

The County Department of Environmental Health's Housing Services conducts inspections on residential structures of three or more units only. Single-unit homes and duplexes are not covered by inspection services.

Specific Actions and Timeline	▪ In 2025, expand the inspection services to cover the entire housing stock.
Primary Responsible Departments	Environmental Health Services
Funding Sources	General Fund
Relevant Housing Policies	2.5 and 2.6

Program 23: Preservation of At-Risk Housing

The County has an inventory of publicly assisted housing projects that offer affordable housing opportunities for lower income households. Most of these projects are deed restricted for affordable housing use long-term. However, 128 units are considered at risk of converting to market-rate housing. The County will work to preserve these at-risk units. Furthermore, two mobile home parks (totaling 102 units) are located in the unincorporated County. A third mobile home park is used as nightly hotel rooms. Mobile homes represent an affordable housing options. The County will monitor the status of these parks.

Specific Actions and Timeline	▪ Annually monitor status of at-risk rental housing projects with the goal of preserving 100 percent of at-risk units. ▪ Ensure tenants are properly noticed by the property owners should a Notice of Intent to opt out of low income use is filed. Notices must be filed three years, one year,

	and six months in advance of conversion. ▪ In the event of a potential conversion, conduct outreach to other nonprofit housing providers to acquire projects opting out of low income use. As funding permits, assist in funding the acquisition or support funding applications by nonprofit providers. ▪ Annually monitor the status of the mobile home parks. In the event of a potential conversion, ensure the owners adhere to relocation requirements mandated by State law. ▪ Consider a Community Opportunity to Purchase Act/Tenant Opportunity to Purchase Act (COPA/TOPA) program (see also Program 30: Tenant Protection Strategies).
Primary Responsible Departments	Housing
Funding Sources	Housing Trust Fund
Relevant Housing Policies	2.5, 2.6, 3.3, and 3.4

Housing Affordability

Program 24: Inclusionary Housing

The County implements an Inclusionary Housing program requiring a 20 percent set aside of new units or lots in a development for affordable housing. Ownership developments must have inclusionary units affordable for low to moderate income households. Rental developments must provide inclusionary units for very low to moderate income households. For both rental and homeownership developments, the larger the project, the deeper the affordability requirements. All inclusionary units must be income-restricted in perpetuity. To enhance housing development feasibility while complying with the inclusionary requirements, the County plans to:

- Modify the inclusionary housing program to expand affordability ranges based on the type and size of projects and to be in compliance with AB 1505.
- Work with Marin County cities and towns to achieve consistency across jurisdictions and to ensure that the policies are aligned with best practices and reflect current market conditions.

The County has been meeting with other county jurisdictions to establish uniform policy elements and the generally agreed upon framework includes:

- 20% set-aside goal
- 2-unit minimum project size threshold
- Requirements should be more stringent for larger projects
- Alternative means of compliance when a project is infeasible:
  - in lieu fee
  - land donation in same planning jurisdiction

Other group recommendations include:

- Ensure compliance with AB 1505 on rental policy
- AMI price levels are consistent across tenures when applicable:
  - Very low income – 50 percent AMI (rental only)
  - Low income – 65 percent AMI (rental and for-sale)
  - Moderate income – 100 percent AMI (rental and for-sale)
  - Above moderate income – 135 percent AMI (for-sale only)
- Offering developers with two options to provide very low or low income units

Specific Actions and Timeline	▪ By 2023, modify the Inclusionary Housing program to expand affordability ranges and to comply with State law. ▪ In 2023, coordinate with other County jurisdictions to align inclusionary housing requirements for consistency.
Primary Responsible Departments	Housing, Planning
Funding Sources	General Fund
Relevant Housing Policies	1.1, 1.4, and 2.4

Program 25: Incentives for Affordable Housing

The County will continue to facilitate the development of affordable housing, especially for lower income households (including extremely low income) and those with special housing needs (including persons with disabilities/developmental disabilities, older adults, large households, farmworkers, educators, and people experiencing homelessness). Incentives may also be offered to encourage the inclusion of amenities in affordable housing development, such as childcare facilities and universal design/vistability. Incentives available for affordable housing projects include:

- County density bonus of 10 percent (above State density bonus)
- Potential fee waivers, especially for special needs housing
- Priority processing
- Technical assistance
- Financial participation by the County, subject to funding availability
- Support and assistance in project developer's applications for other local, State, and federal funds

Specific Actions and Timeline	▪ Continue to offer incentives to facilitate affordable housing. ▪ Annually conduct outreach to affordable housing developers to evaluate the effectiveness of incentives and make appropriate adjustments, and to identify and pursue development opportunities. ▪ Provide support (incentives, technical assistance) to school districts to develop district-owned parcels in unincorporated Marin as affordable educator housing. ▪ Facilitate the development of 300 affordable units over eight years.
Primary Responsible Departments	Housing, Planning
Funding Sources	General Fund; Housing Trust Fund
Relevant Housing Policies	2.4

Program 26: Below Market Rate (BMR) Homeownership Program

The BMR Homeownership program offers low and moderate income, first-time homebuyers the opportunity to purchase specified condominium units in Marin County at less than market value. If the owner of a BMR unit sells, the unit is resold to another income-eligible homeowner.

Homeownership is an important strategy for wealth-building. Due to a history of policies and programs that prevented people of color from accessing homeownership for generations, providing affordable homeownership can help address the growing racial wealth gap.

Specific Actions and Timeline	▪ Maintain 90 BMR units for continued affordable housing for lower and moderate income households. ▪ Successor Agency funds will be exhausted within the eight-year timeframe of the Housing Element. Beginning in 2024 and annually thereafter, pursue additional funding from local, State, and federal programs to expand affordable homeownership opportunities for first-time buyers.
Primary Responsible Departments	Housing, Marin Housing Authority
Funding Sources	Successor Agency to the Marin County Redevelopment Agency; other funding sources (such as in-lieu fees)
Relevant Housing Policies	2.1, 2.4, and 3.4

Program 27: Community Land Trust

Currently, the County has two Community Land Trusts in the unincorporated areas – Community Land Trust Association of West Marin (CLAM) and Bolinas Community Land Trust (BCLT). The County provides financial, administrative, and technical support to the CLTs. The County may facilitate the establishment of additional Community Land Trusts in different Community Planning Areas (CPAs).

Specific Actions and Timeline	▪ Continue supporting the operation of CLTs. ▪ Subject to funding availability, establish additional CLTs in other CPAs.

Primary Responsible Departments	Housing
Funding Sources	General Fund
Relevant Housing Policies	3.4, 4.1, and 4.2

Program 28: Affordable Housing Funding Sources

The County's Affordable Housing is funded with a variety of sources:

- Affordable Housing Impact Fee
- Inclusionary Housing In-Lieu fee
- Rental Housing Impact Fee
- Jobs/Housing Linkage Fee
- CDBG
- HOME
- Permanent Local Housing Allocation
- General Fund

In addition, the County continues to pursue additional funding from State and Federal housing programs. Other potential sources may include vacant home tax (see Program 19).

Specific Actions and Timeline	▪ Annually pursue additional funding from State and Federal housing programs. ▪ Facilitate the development of 300 affordable housing units (excluding 200 units projected from the Inclusionary Housing program).
Primary Responsible Departments	Housing
Funding Sources	Affordable Housing Trust Fund
Relevant Housing	3.4

Policies	

Program 29: Community Plans

Existing community plans contain goals, policies, and programs that are inconsistent with the Countywide Plan. Where such conflicts exist, the Countywide Plan prevails. The County will pursue neighborhood improvement strategies through community plans – specifically for Marin City, which already has a high concentration of affordable housing.

Specific Actions and Timeline	▪ In 2023, initiate Marin City Community Plan, with the goal of adopting the plan by 2025.
Primary Responsible Departments	Housing; Planning
Funding Sources	General Fund
Relevant Housing Policies	1.1 and 4.3

Affirmatively Furthering Fair Housing

Program 30: Fair Housing Outreach and Enforcement

The County refers fair housing complaints to Fair Housing Advocates of Northern California (FHANC) for legal services. The County will assist in fair housing outreach and education, and reasonable accommodations through funding FHANC.

Specific Actions and Timeline	▪ Assist an average of 50 residents annually with tenant/landlord dispute resolution, and fair housing inquiries and investigations. ▪ Annually update, or more frequently as needed, the County's Landlord and Tenant Resources webpage. ▪ Beginning in 2023, increase fair housing outreach to Homeowners Associations, realtors, property managers, and brokers, as well as individual property owners (such as single-unit homes, duplex/triplex units, and ADUs used as rentals). Specifically, promote the State's Source of Income Protection bills (SB 329 and SB 222) that prohibit

	discrimination based on the use of public assistance for housing payments (such as Housing Choice Vouchers).
Primary Responsible Departments	Fair Housing Advocates of Norther California; Housing Authority; Housing
Funding Sources	CDBG; General Fund
Relevant Housing Policies	4.1, 4.2, and 4.3

Program 31: Tenant Protection Strategies

Throughout the region, tenants are facing rising rents and increasing risk of eviction due to the economic impact of COVID, as well as displacement from the economic pressure of new development. The County will explore a variety of strategies that strengthen tenant protection. These may include:

- **Rent stabilization:** While AB 1482, the California Tenant Protection Act of 2019, imposes rent caps on some residential rental properties through 2030, it exempts most single-unit homes and condominiums for rent, and multi-unit housing units built within the previous 15 years. Additionally, AB 1482 sets an allowable rent increase in a year to 5% plus the regional cost-of-living index or 10%, whichever is less. Strategies to strengthen rent stabilization include adopting a permanent policy, expanding applicability to units not covered by AB 1482, and/or considering a lower rent increase threshold. However, at this time, compliance with the 1995 Multi-unit Housing Act (Costa Hawkins) is required.
- **Just cause for eviction:** AB 1482 also establishes a specific set of reasons for which a tenancy can be terminated. These include: 1) default in rent payment; 2) breach of lease term; 3) nuisance activity or waste; 4) criminal activity; 5) subletting without permission; 6) refusal to provide access; 7) failure to vacate; 8) refusal to sign lease; and 9) unlawful purpose.

  The County passed an ordinance to require a just cause for eviction that applies to properties of three or more dwelling units in January 2019, before the adoption of AB 1482. To strengthen this ordinance, the County will consider expanding “just cause” to all units, and/or including relocation assistance.

  No-fault causes, such as substantial remodels, owner move-ins, and withdrawal from the rental market, are the leading cause of evictions and displacement .

These no-fault just causes are often used by owners to remove tenants so that rents can be increased to market rate, further eroding naturally occurring affordable housing stock. Strengthening no-fault just causes for evictions through higher relocation payments, longer eviction notice periods, and a right for a tenant to return can be effective anti-displacement strategies. An expanded just cause ordinance may also include evictions due to substantial repairs and withdrawal from the rental market.

- **Local relocation assistance:** Given both limited rental options and high housing costs in Marin County, many displaced residents are forced to move out of the County entirely. To address this, the County can adopt a local relocation assistance provision that would require owners to provide financial assistance to tenants if pursuing a no-fault termination. The County can also consider requiring greater relocation assistance to special needs groups (e.g., seniors, disabled, female-headed households) and reasonable accommodation for persons with disabilities.
- **Tenant commission:** Typically, most land use policies and planning decisions are made from the perspective of property owners and tenants lack a voice in the planning process. A tenant commission or advisory committee may be an avenue to bring policy discussions that highlight tenant interests to the County. While the proportion of renter-occupied units in the County is growing, there is currently no body within the County where their unique concerns can be raised.
- **Right to Purchase:** When tenants are being evicted due to condominium conversion or redevelopment, offer first right to purchase to displaced tenants to purchase the units.
- **Right to Return:** When tenants are being evicted due to rehabilitation/renovation of the property, offer first right to displaced tenants to return to the improved property.
- **Tenant Bill of Rights:** Adopt a Tenant Bill of Rights (TBR) that serves to establish the standard that all Marin residents have the right to clean, safe and secure housing. The TBR can include an extension of tenant protections to subletters and family members, and mechanisms to address severe habitability issues and market pressures, such as stronger protections for tenants from eviction if they deduct repairs from rent. This provision would also provide anti-retaliation protection for tenants that assert their rights.
- **Community or Tenant Right to Purchase (COPA/TOPA):** Pursue COPA/TOPA as a means to preserve affordability and mitigate potential displacement impacts by offering community organizations or tenants the first

opportunity to purchase a residential building if the owner is selling. COPA/TOPA policies offer community organizations or tenants the right to negotiate and collectively bargain.

Specific Actions and Timeline	▪ Continue to implement the County's Landlord Registry requirement. ▪ In 2023, begin community outreach to discuss various tenant protection strategies as outlined above. Study the administrative and financial feasibility and relative efficiency of each strategy. ▪ In 2024, based on the outcome of the community outreach and also assessment of feasibility, adopt appropriate tenant protection strategies. ▪ Continue to work with Marin cities and towns to consider similar policies.
Primary Responsible Departments	Housing
Funding Sources	General Fund
Relevant Housing Policies	4.1

Program 32: Comprehensive Review of Zoning and Planning Policies

The County's Development Code and planning policies have been incrementally developed over time and may have inherited language rooted in segregation. The County will conduct a comprehensive review of its zoning and planning policies to remove discriminatory language or policies that may directly or indirectly perpetuate segregation. This includes reviewing the use of the terms "single-family" residential use, "protecting the character of the neighborhood," and findings of conditional approval in different regulatory documents.

Specific Actions and Timeline	▪ In 2024, conduct a comprehensive review of zoning and planning policies and make appropriate revisions to remove discriminatory language and policies.
Primary Responsible	Housing, Planning, Building

Departments	
Funding Sources	General Fund
Relevant Housing Policies	1.1 and 4.3

Program 33: Community Engagement and Regional Collaboration

Community Development Agency (CDA) outreach working group work with local communities to obtain input on housing and community development issues, especially to highlight areas that have historically been underserved or underrepresented in these conversations.

The County will also conduct outreach and education to promote the need for and benefits of additional housing in the unincorporated County, especially housing that meets the diverse needs of all socioeconomic segments of the County residents.

In 2019, County staff reconvened a countywide working group of Planning Directors and planning staff to encourage interjurisdictional collaboration on housing issues and solutions, with a specific focus on responding to new state legislation to streamline housing developments. The working group established common goals and coordinated on housing legislation, planning, production, and preservation of existing affordability. The working group meets once monthly and has evolved from briefings and discussions regarding state housing legislation into collaboration on projects to facilitate the development of more housing in Marin County. The working group applied jointly for SB2 planning grants in the summer and fall of 2019 and has started to collaborate on these grant projects, including Objective Design and Development Standards, an ADU Workbook and Website, and inclusionary housing program updates. The group received funds from ABAG to work collaboratively on shared Housing Element deliverables including translation dollars, Affirmatively Furthering Fair Housing products, visualizations, and a countywide website.

The County will continue to have a leadership role to coordinate with other jurisdictions within the County to expand housing opportunities throughout the County, achieve consistency in policies, and collaborate on affordable housing projects through the Housing Working Group. Specifically, the County has committed to the following:

- Implementation of Housing Element programs: During implementation of the 2023-2031 Housing Element, the County, cities and towns will collaborate on program implementation, especially those related to Affirmatively Furthering Fair Housing and tenant protections, such as:

- Model ordinances: developing model ordinances to be considered by the Board of Supervisors and City Councils.
- Outreach and community engagement: Conducting shared outreach and community engagement.

- Housing Element Collaboration: Develop a deeper and more formalized collaboration on the Housing Element in the future. This could include:
  - One Housing Element: Develop one document with shared background, outreach, programs and policies. This would provide consistency, save funds and improve accessibility for stakeholders and housing developers.
  - Consider a Subregional approach: The County and cities and towns will consider developing a subregional approach to meeting the Regional Housing Need Allocation in the next housing element cycle.
  - Shared consultants to conserve resources and develop more consistent policies and programs, the County, cities and towns will seek to hire the same consultants to prepare parts of the housing element, conduct regional outreach and conduct any needed environmental review.
- Funding collaboration: explore ways to more effectively collaborate on shared funding for affordable housing. This could include:
  - Inclusionary policies: Developing more consistent policies and fees to encourage and facilitate more affordable housing as part of new market rate developments and increase funding for affordable housing.
  - Regional housing trust fund: Consider the establishment of a regional housing trust fund which would make state applications more competitive and lower the administrative burden for cities and towns.
  - Community Development Block Funds: Continue to collaborate as an entitlement community on using CDBG funds to fund affordable housing and leverage other State and Federal Sources.
  - Permanent Local Housing Allocation (PLHA): Continue to collaborate as an entitlement community to use PLHA funds on housing-related projects and programs that assist in addressing the unmet housing needs of our local communities.
  - The Bay Area Housing Finance Authority (BAHFA): Actively participate and support the efforts of BAHFA to raise funds to help address affordable housing and housing stability.
- Shared staffing: With the exceptions noted above, the County, and cities and

towns address most housing issues individually, and often with limited staff and financial resources. Programs and policies in the Housing Element require concrete goals and deliverables which will be difficult for smaller jurisdictions to achieve with all of the other obligations associated with their work. Shared staffing initiatives would encourage coordination and working together to tackle the housing crisis on a larger scale through shared housing staff to provide expertise and local knowledge to support affordable housing developers. This would also result in consistency throughout the county and adoption of best practices.

Specific Actions and Timeline	▪ By December 2023, develop a work plan and present to the BOS to identify new geographic areas/populations for outreach and establish a protocol for conducting outreach, with coordinated efforts with County CDA. ▪ In 2023 and annually thereafter, continue working with the regional working group on housing to coordinate and collaborate on regional solutions to housing issues as outlined above.
Primary Responsible Departments	Housing, Planning
Funding Sources	General Fund
Relevant Housing Policies	3.1, 3.2, 4.2, and 4.3

Affirmatively Furthering Fair Housing Action Matrix

The following table summarizes the County's implementation actions to further fair housing. Individual housing programs may have different impacts on furthering housing choices. Fair housing actions are grouped into the five themes:

- Fair housing outreach and enforcement
- Housing mobility through expanded choices in housing types and locations
- New opportunities in high resource areas
- Place-based strategies for neighborhood improvements
- Tenant protection and anti-displacement

Housing programs are often implemented throughout the unincorporated areas. However, individual programs may have targeted locations for specific actions, increased outreach efforts, and/or priority for allocation of resources.

Table H-5.2: AFFH Action Matrix

Program	Specific Commitment	Timeline	Geographic Targeting	Eight-Year Metrics
Housing Mobility				
Program 4: Accessory Dwelling Units	Dedicate an ombudsperson position to help applicants navigate the pre-development phase of ADU construction.	2023-2031	Throughout unincorporated County	280 ADUs or JADUs
Program 7: Religious and Institutional Facility Housing Overlay	Establish a Religious and Institutional Facility Housing Overlay to extend the provisions of Section 65913.6 to other institutional and religious uses.	By December 2024	Throughout unincorporated County	Create 100 affordable units within the Overlay
Program 8: Development Code Amendments	Amend County Development Code to facilitate the development of a variety of housing types.	By December 2023	Throughout unincorporated County	Achieve 25 percent of affordable housing for special needs populations
Program 13: Reasonable Accommodation	Offer expedited review and approval of Reasonable Accommodation requests.	Beginning in 2023	Throughout unincorporated County	Not applicable
Program 14: Universal Design and Visitability	Study policies and/or incentives to encourage requirements for universal design and visitability, and develop them by 2025 for implementation.	Study in 2024 Develop policies/ incentives by 2025	Throughout unincorporated County	Increase accessible units by 10 percent

Table H-5.2: AFFH Action Matrix

Program	Specific Commitment	Timeline	Geographic Targeting	Eight-Year Metrics
Program 15: Housing for Farmworkers and Hospitality Workers	Develop strategies for addressing farmworker and hospitality worker housing,	By December 2025	Throughout unincorporated County	Increase housing for these employees by 20 percent
Program 16: Project Homekey	Identify locations that may be appropriate as Project Homekey sites and conduct outreach to interested nonprofit developers to pursue funding from HCD.	In 2023	Throughout unincorporated County	Develop 20 units
Program 17: Housing for Seniors	Explore expansion of home match services to help match over-housed seniors with potential lower income tenants.	In 2023	Throughout unincorporated County	Increase home matches by 20 percent
	Develop incentives and development standards to facilitate various senior housing options (such as senior apartments/homes, co-housing, assisted living, etc.).	In 2024	Throughout unincorporated County	Increase senior housing units by 20 percent
Program 21: Rehabilitation Assistance	Provide support for households to make accessibility improvements.	Annually	Throughout unincorporated County	Assist 48 households
Program 26: Below Market Rate (BMR) Homeownership Program	Provide support for first-time low and moderate income homebuyers to purchase a home at below-market value.	Annually	Throughout unincorporated County	Maintain 90 BMR units but pursue to increase affordable homeownership

Table H-5.2: AFFH Action Matrix

Program	Specific Commitment	Timeline	Geographic Targeting	Eight-Year Metrics
Program 33: Community Outreach and Regional Collaboration	Develop model ordinances to facilitate affordable housing development and tenant protection to be considered by the Board of Supervisors and City Councils. Conduct shared outreach and community engagement.	Annually	Throughout the County, including in High Resource communities	Increase affordable housing construction throughout the County, especially in High Resource communities
New Opportunities in High Resource Areas				
Program 4: Accessory Dwelling Units	Pursue and allocate financial incentives to support ADU construction with the annual goal of assisting 5 lower income households with ADU construction or deed restricting 5 ADUs as affordable housing.	Annually	Throughout unincorporated County, particularly in High Resource areas	40 ADUs as affordable housing
Program 5: SB 9 Mapping Tool	Develop and implement an online mapping tool that will identify areas in the unincorporated area that are eligible to use SB 9.	By December 2024	Throughout unincorporated County, with emphasis in Los Ranchitos (Opportunity Area)	Online tool created
Program 7: Religious and Institutional Facility Housing Overlay	Establish a Religious and Institutional Facility Housing Overlay to extend the provisions of Section 65913.6 to other institutional and religious uses.	By December 2024	Throughout unincorporated County, with emphasis in High Resource areas	Create 100 affordable units within the Overlay, including 50 units in High Resource areas

Table H-5.2: AFFH Action Matrix

Program	Specific Commitment	Timeline	Geographic Targeting	Eight-Year Metrics
Program 24: Inclusionary Housing	Modify the Inclusionary Housing program to expand affordability ranges and to comply with State law	By 2023	Throughout unincorporated County	Increase affordable housing by 500 units
Program 33: Community Outreach and Regional Collaboration	Funding collaboration: explore ways to more effectively collaborate on shared funding for affordable housing. This could include: • Inclusionary policies • Regional housing trust fund • Community Development Block Funds • Permanent Local Housing Allocation • Bay Area Housing Finance Authority	By 2024	Throughout the County	Increase affordable housing construction throughout the County, especially in High Resource communities

Table H-5.2: AFFH Action Matrix

Program	Specific Commitment	Timeline	Geographic Targeting	Eight-Year Metrics
Place-Based Strategies for Neighborhood Improvements				
Program 10: Objective Development Standards for Off-Site Improvements	Establish objective development standards for off-site improvements	By December 2025	Rural communities	Development Code amended
Program 12: Septic for Multi-Unit Housing	Develop standards for multi-unit development in septic areas. Initiate a study to identify alternative approaches to sewage disposal (e.g., package plants, community systems, incinerator toilets, etc.). Upon completion of the study, update by 2024 the County's methodology for calculating septic capacity.	Study in 2022/2023 Update methodology by 2024	Rural communities, with emphasis in West Marin, Greenpoint-Blackpoint	Development Code amended
Program 27: Community Land Trust	Subject to funding availability, establish additional CLTs in other CPAs.	2023-2031	Marin City and areas along City Centered Corridor	Create 100 affordable units through CLTs
Program 29: Community Plans	Initiate Marin City Community Plan, with the goal of adopting the plan by 2025.	Initiate in 2023 with adoption in 2025	Marin City	Not applicable
Tenant Protection and Anti-Displacement				
Program 3: Replacement Housing	Update Development Code to address replacement requirement	By December 2022	Throughout unincorporated County	Development Code amended

Table H-5.2: AFFH Action Matrix

Program	Specific Commitment	Timeline	Geographic Targeting	Eight-Year Metrics
Program 15: Housing for Farmworkers and Hospitality Workers	Develop strategies for addressing farmworker and hospitality worker housing.	By December 2025	Throughout unincorporated County, with emphasis in West Marin	Increase housing dedicated for farmworkers or hospitality workers by 20 percent
Program 16: Project Homekey	Identify locations that may be appropriate as Project Homekey sites and conduct outreach to interested nonprofit developers to pursue funding from HCD.	In 2023	Throughout unincorporated County	Develop 20 Project Homekey units
Program 18: Short-Term Rentals	Evaluate and adopt strategies for regulating short-term rentals.	In 2023	Throughout unincorporated County, with emphasis in West Marin where a larger number of units are being used as vacation rentals	Development Code amended
Program 19: Vacant Home Tax	Study the feasibility of a vacant home tax as a strategy to discourage unoccupied housing units and increase revenue for affordable housing. If appropriate, pursue ballot measures to establish tax.	Study in 2024 Pursue ballot in 2025	Throughout unincorporated County	Issue placed on Ballot
Program 20: Monitoring of Rental Housing	Expand Landlord Registry requirements to cover all rental units in the unincorporated County.	In 2024	Throughout unincorporated County	Collect accurate rental data

Table H-5.2: AFFH Action Matrix

Program	Specific Commitment	Timeline	Geographic Targeting	Eight-Year Metrics
Program 23: Preservation of At-Risk Housing	Monitor status of at-risk projects with the goal of preserving 100% of at-risk units	Annually	Throughout unincorporated County, with emphasis in Marin City and Santa Venetia	Preserve 128 at-risk rental units Preserve 102 mobile home park units
Program 31: Tenant Protection Strategies	Begin community outreach to discuss various tenant protection strategies and adopt appropriate tenant protection strategies.	Begin outreach in 2023 Adopt strategies in 2024	Throughout unincorporated County, with emphasis in Marin City and West Marin where risk of displacement is high	Tenant protection strategies adopted
Fair Housing Outreach and Enforcement				
Program 30: Fair Housing Outreach and Enforcement	Assist an average of 50 residents annually with tenant/landlord dispute resolution, and fair housing inquiries and investigations.	Annually	Throughout unincorporated County	Assist 400 residents
	Increase fair housing outreach to Homeowners Associations, realtors, property managers, and brokers, as well as individual property owners (such as single-unit homes, duplex/triplex units, and ADUs used as rentals).	Beginning in 2023 and annually thereafter	Throughout unincorporated County, with emphasis in West Marin, Marin City, and Santa Venetia	Conduct 40 outreach events

Table H-5.2: AFFH Action Matrix

Program	Specific Commitment	Timeline	Geographic Targeting	Eight-Year Metrics
Program 32: Comprehensive Review of Zoning and Planning Policies	Conduct a comprehensive review of zoning and planning policies to remove discriminatory language and policies.	In 2025	Throughout unincorporated County	Not applicable
Program 33: Community Engagement and Regional Collaboration	Develop a work plan and present to the BOS to identify new geographic areas/ populations for outreach and establish a protocol for conducting outreach, with coordinated efforts with County CDA.	By December 2023	Throughout unincorporated County, with emphasis in West Marin, Marin City, and Santa Venetia	Conduct 40 outreach events

Quantified Objectives

For the 2023-2031 planning period, the County has established quantified objectives for construction, preservation, and rehabilitation of housing in the unincorporated areas. Pursuant to State law, quantified objectives can be established based on trends and available resources.

Table H-5.3: Summary of Quantified Objectives (2023-2031)

	Extremely Low	Very Low	Low	Moderate	Above Moderate	Total
RHNA	550	550	634	512	1,323	3,569
New Construction	50	200	250	200	500	1,200
Rehabilitation Assistance	28	50	50			128
Preservation of At-Risk Housing	57	58	115			230

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Marin HESE - Engagement & Outreach Activities SUMMARY

Note: Due to public health restrictions on public gathering related to the Covid-19 pandemic, activities that required people to gather in person such as workshops, hearings, and focus groups were conducted on-line using Zoom video conferencing.

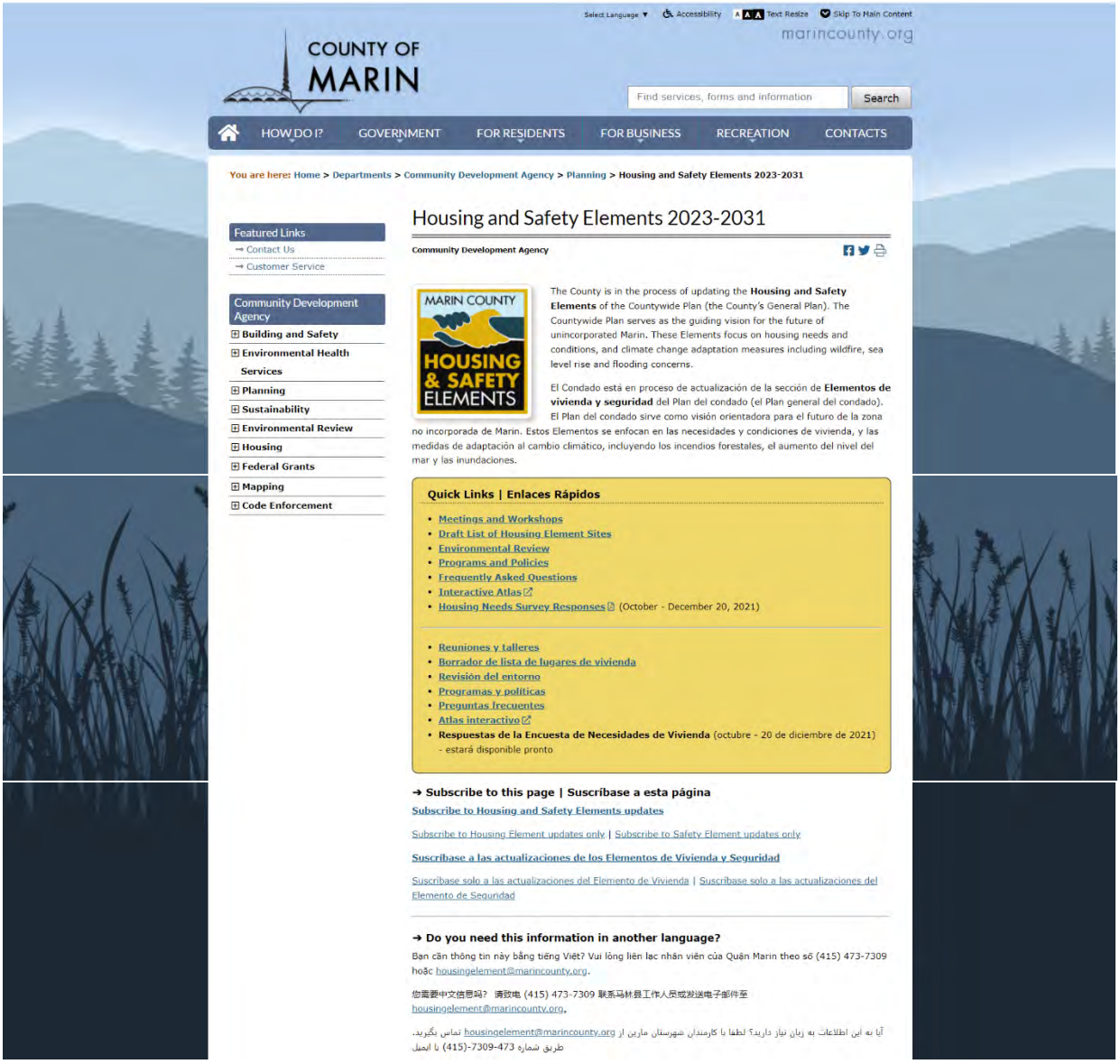
Activities listed in chronological order

Activity	Time Period	Target Audience	Summary	Translation / Interpretation Provided	Results / Feedback	Participation Metrics
Dedicated webpage	Ongoing	All	Serves as significant outreach tool to publicize activities and host supporting documents	Spanish translation of key activities	Low-cost efficient way to communicate and host documents and on-line tools	
County email notification service	Ongoing	All	Participants can sign-up to receive automatic notification when new materials are posted on website and when outreach activities are happening	Spanish translation of outreach activities	Participants received regular notifications through out process	
Email and telephone communications with County staff	Ongoing	All	Throughout the process, County staff received comments and responded to questions through phone and email		Provided customized assistance to any requestor. Also, it provided an opportunity for those to comment without using any of the tools or participating in a workshop or hearing.	355 emails received related to sites
Social Media	Ongoing	All	County used Facebook, Next Door and related platforms to promote outreach activities	Spanish	Actively promoted workshops, hearings and digital surveys	
Outreach Flyers	Before outreach activities	All	Flyers were posted at neighborhood hubs and bulletin boards	Spanish	Flyers helped to reached those who don't use or don't have access to technology	
Focus Groups with following groups: -CBOs (2 sessions) -Homeowners (1 session) -Low-income residents (1 sessions) -West Marin Collaborative -County of Marin Employee Affinity Groups	Aug - Sept 2021	AFFH audiences: - Low-income - Minorities - People with disabilities	Engaged CBOs who represent AFFH populations Recruited and screened residents who represented specific demographic groups that input was needed from		Qualitative information about housing needs, barriers and challenges. Participants also responded to questions related to emergency preparedness and concerns regarding natural hazards to inform the Safety Element.	- 17 CBO's Invited - 14 CBO's Attended Participating CBO's provide service to seniors, people with disabilities, low-income, and minority adults and families -14 Resident Participants Recruitment Results: 8 were renters 6 were owners 4 said they speak a second language at home (3 Spanish, 1 Cantonese) Total household income before taxes 2 selected Less than $25,000 2 Prefered not to say County of Marin Employee Affinity Groups included: -MCOLE (Marin County Organization of Latino Employees) -COMAEA (County of Marin African-American Employees Association) -MAPLE (Marin Asian American Public Local Employees)
Community Workshop #1	Sept 22, 2021	All	Focused on introducing the Housing Element. Also introduced the Safety Element	Spanish & Vietnamese -Spanish speakers were present but Zoom does not provide a count by language, We added the Language request question in registration as a result.	Initial feedback about issues and concerns	176 registrants 82 participants Polling results: 30 were owners 16 were renters
Marin County Housing and Safety Elements	Monthly	Represent All areas of unincorporate				

Activity	Time Period	Target Audience	Summary	Translation / Interpretation Provided	Results / Feedback	Participation Metrics
Stakeholder Committee		d County. Members also include: -Young adult under 24 -Older adults non-White groups, including Black/African American and American Indian/Native American -Without permanent housing				
Postcard mailing	Nov 2021	All	Postcard mailed to 22,000 households to introduce the HE and promote outreach activities	Spanish & Vietnamese (included QR code and directions in Spanish & Vietnamese so recipient could get complete information in their preferred language.	The mailing served to reach households in a manner that didn't require technology and catch the attention of those who are on-line but were not aware of the process. The mailer also provided a phone contact for those who do not have access to or don't use online tools.	22,000 mailed
Community Workshop #2	Nov 22, 2021	All	Workshop focused on Safety Element and explained how the County would respond to natural hazards. These issues were prominent in comments received related to and informed the housing element.	Spanish & Vietnamese -4 registrants requested Spanish	County received substantial input on participant issues and concerns.	84 registrants 31 participants Polling: 10 were homeowners 5 were renters
Joint Session / Board of Supervisors & Planning Commission	Dec 7, 2021	All	Presented HE, RHNA numbers and initial outreach findings	Spanish	BOS/PC input yielded guiding principles that were used to inform the identification of potential sites.	
Consider-it Forum	Nov - Dec 2021	All	Collected input about people's safety concerns and preparedness for responding to natural hazards and extreme weather.	Included translation option through Google translate	Many concerns about limited housing were linked to safety issues such as emergency evacuations. Input validated and further described the concerns people expressed during HE events	
Digital Housing Needs Survey	Oct - Dec 2021	All	Collected input about housing needs	Spanish translation and outreach	Brief survey was designed to collect input on housing needs and collect input with those with limited time to participate.	626 responses in English 22 responses in Spanish
Print version of Housing Needs Survey	Oct - Dec 2021	-Seniors -People with disabilities -Paratransit users -Low-income & without digital access	Collected input about housing needs. Surveys were distributed through community groups with the largest distribution achieved by a paratransit provider. County staff also attended several in-person events to share and discuss the survey.	Spanish translation and outreach. Paper surveys were distributed by a paratransit provider which helped reach people with disabilities	Brief survey was designed to collect input on housing needs and collect input with those with limited time to participate and no access to technology.	102 responses in English 68 responses in Spanish
Public Hearing - CEQA Scoping Meeting	Jan 11, 2022	All	Provided opportunity to comment on scope of environmental document.		Received comments to inform scoping	16 participants
Sites Road Shows	Jan - Feb 2022	All Minority residents Low-income Farmworkers Seniors People with disabilities	Presented "roadshow" of Housing Element information and sites to multiple neighborhoods, including: - Kentfield (Kentfield Planning Advisory Board meeting) - Tamalpais Valley (Tamalpais Valley Design Review Board) - Strawberry (Strawberry Design Review Board) - Lucas Valley and Marinwood	Spanish Interpretation provides at West Marin, Santa Venetia/Los Ranchito, Unincorporated Novato and Marin City Road Shows	Along with introducing BA as a tool, participants were given multiple options to provide comments. The Road Shows allowed participants to ask questions and comment on sites in their specific geographic area.	460 participants

Activity	Time Period	Target Audience	Summary	Translation / Interpretation Provided	Results / Feedback	Participation Metrics
			- Santa Venetia and Los Ranchitos - Marin City (Community Conversations meeting) - West Marin - Unincorporated Novato - Follow-up meeting in San Geronimo Valley (West Marin) and Atherton (unincorporated Novato) - Follow-up meeting in Tomales and another in San Geronimo Valley (In May)			
Community Workshop #3	Jan 20, 2022	All	-Informed the community about the planning process for achieving County housing goals and the Site Selection Process -Provided an opportunity for participants to share their input on the site selection process. -Introduced digital tool used to receive input on specific sites.	Spanish, Streamed to Youtube -5 Registrants requested Spanish	Introduced potential housing sites and described the process that would be used to narrow the sites to achieve the RHNA goal.	209 registrants 103 participants Polling: 60 were homeowners 8 were renters
Joint Session / Board of Supervisors & Planning Commission	Mar 1, 2022	All	Presented initial sites and scenarios based on guiding principles, technical analysis and public input.	Spanish	Process started with the identification of sites that would far exceed the RHNA to allow for substantial community input.	
Joint Session / Board of Supervisors & Planning Commission	Mar 15, 2022	All	Presented revised scenarios for BOS/PC consideration and public input..	Spanish	BOS/PC provided input on preferred BOS/PC members and public provided additional feedback to inform refinements..	More than 40 people made public comments
Balancing Act (BA)	Feb-March 2022	All	BA Platform Open for Input	Spanish	Receive input on preferred housing sites to meet the RHNA	2,925 page views 143 completed submittals
Balancing Act Office Hours	Mar 2022	All	Staff provided on-line evening office hours to assist people who needed help with BA, Office hours were promoted during the Road Shows along with the channels used to promote BA		Provided assistance to anyone needing help with the BA platform	
Digital Atlas	March 2022	All	County produced a digital mapping tool, the Atlas, that provided information about community demographics and natural hazards - which were key concerns identified in many of the comments received.	Included translation option through Google translate	Provided more detailed information for people to consider as they comment on potential housing sites. Participants could also submit site comments using the Atlas.	
Community Workshop #4	Mar 29, 2022	All	Described the role that policies and programs play in the HE. Solicited input on policy topics including tenant protections and programs to serve special populations including farmworkers, seniors and people with disabilities	Spanish		181 registrants 112 participants Polling: 58 were homeowners 13 were renters
Community Workshop #5	April 5, 2022	All	Provide an overview of the Safety Element update process. Discuss new climate change and resiliency planning goals and policies Present key issues and policies for discussion	Spanish		55 registrants 32 participants Polling: 16 were homeowners 2 were renters
Joint Session / Board of Supervisors & Planning Commission	April 12, 2022	All	Part 1: Received direction on sites included in HE. Part 2: Received direction on policies and programs	Spanish	Input informed list of sites for use in the environmental impact analysis.	

Dedicated Webpage



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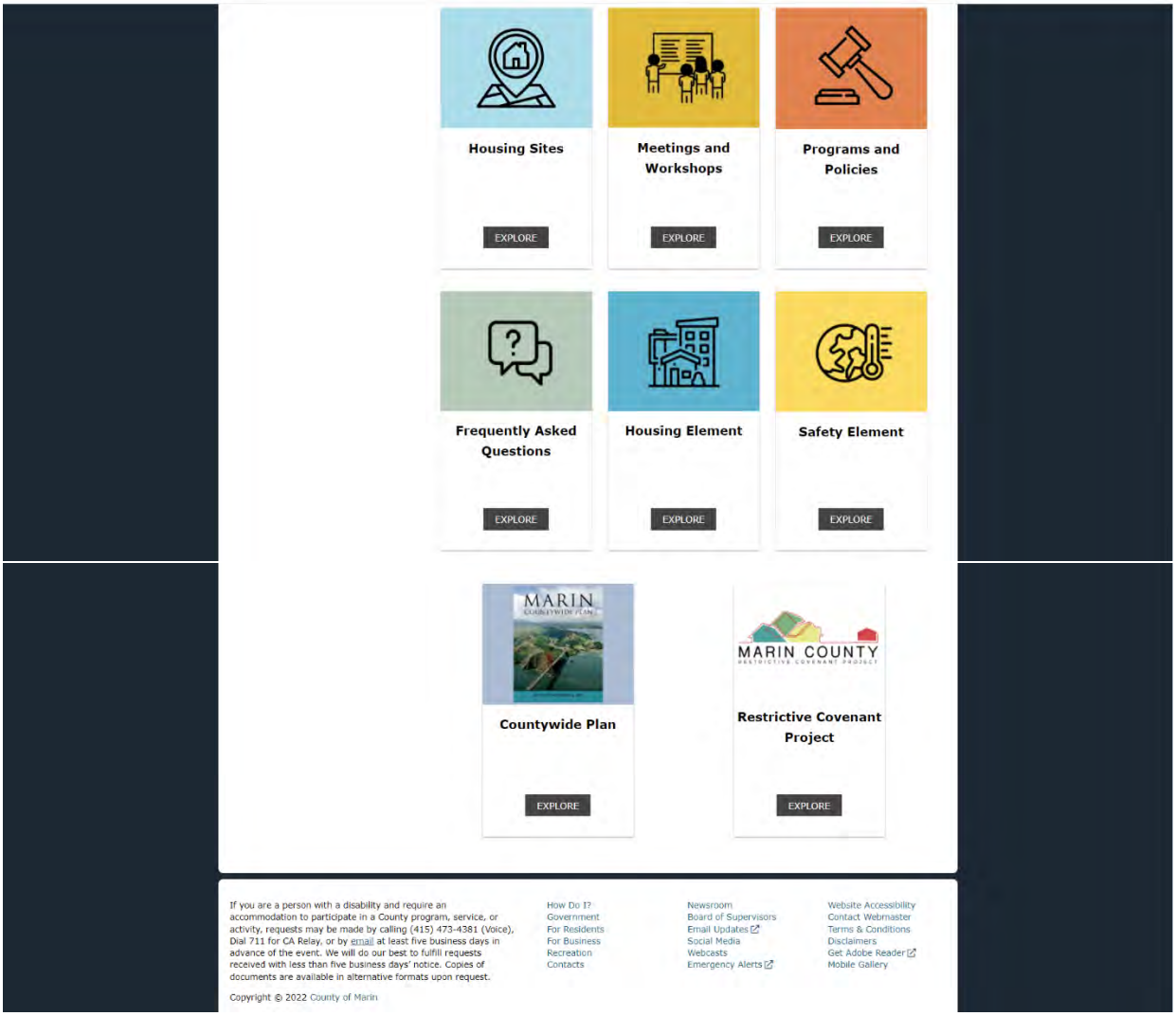

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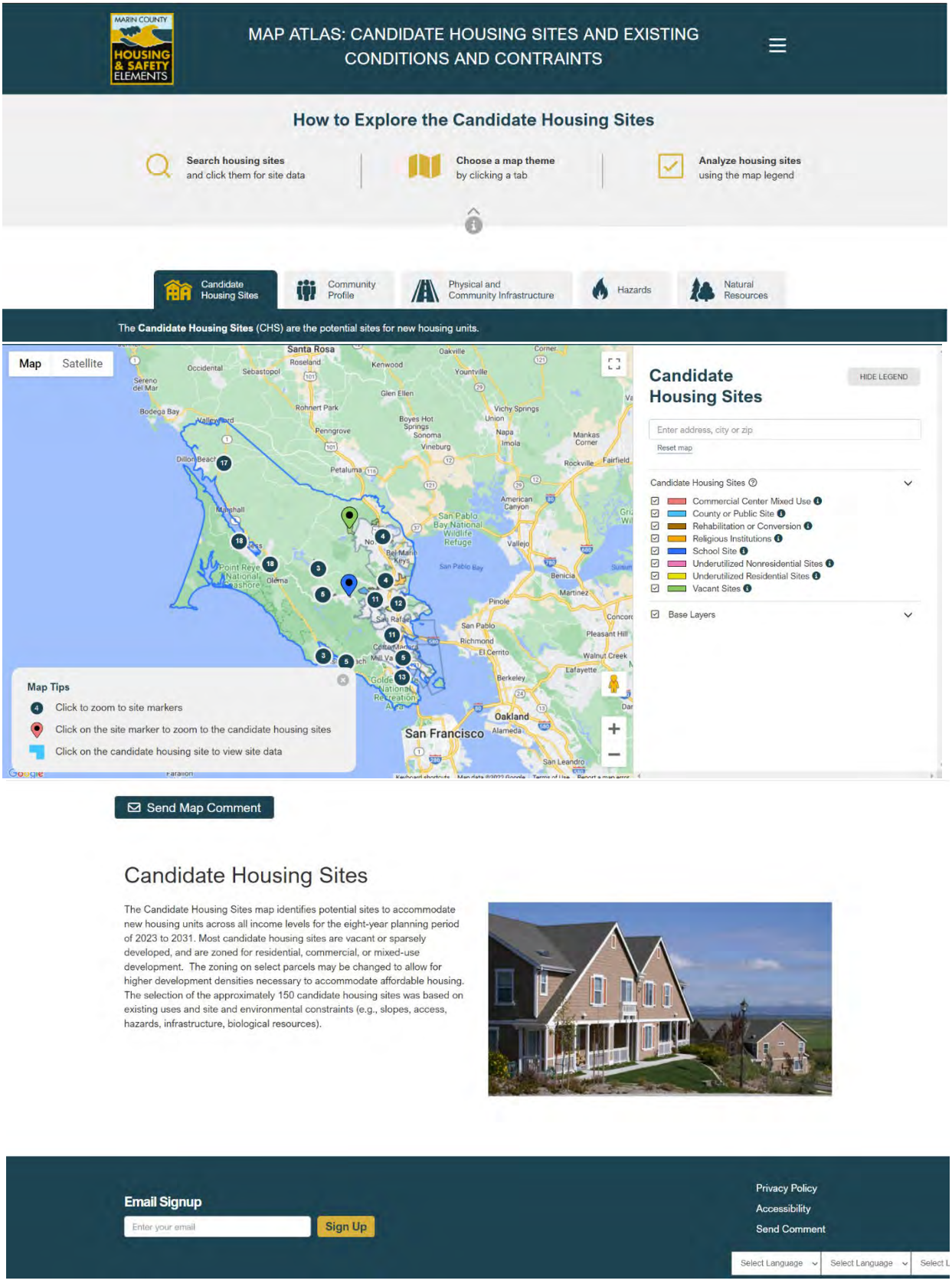
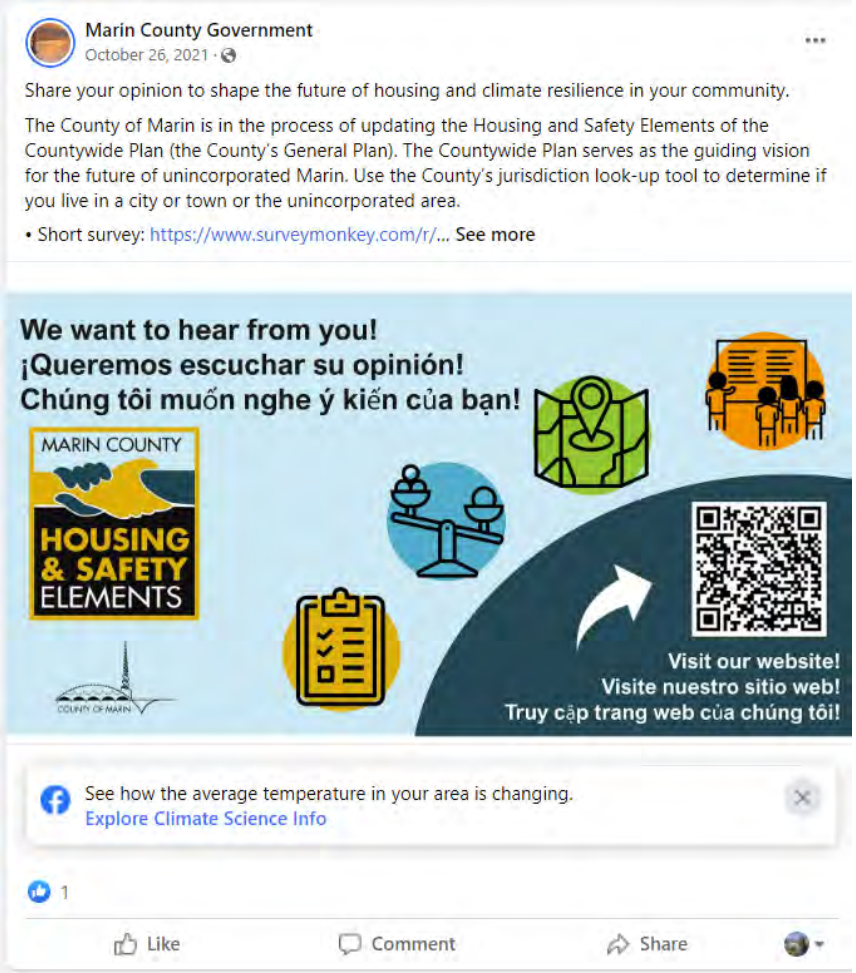


Facebook posts

Facebook posts



Facebook posts

Facebook posts

Shape the future of housing and plan for climate change in your community.

MARIN COUNTY

HOUSING & SAFETY ELEMENTS

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The meeting will take place on Zoom on **Wednesday September 22, 2021 from 6:00-8:00 P.M**. There will be live Spanish translation.

Register for this meeting at https://tinyurl.com/MarinHousingandSafetyRSVP or scan this QR code:

www.MarinCounty.org/HousingSafetyElements

For disability accommodations please phone (415) 473-7309 (Voice), CA Relay 711, or e-mail HousingElement@MarinCounty.org at least five business days in advance of the event. The County will do its best to fulfill requests received with less than five business days' notice. Copies of documents are available in alternative formats, upon request.

Determine el futuro de las viviendas y haga planes para el cambio climático en su comunidad.

MARIN COUNTY

HOUSING & SAFETY ELEMENTS

Únase a nosotros en una reunión comunitaria en línea el 22 de septiembre de 2021.

Únase al Condado de Marin en una reunión **comunitaria e interactiva en línea, orientada a soluciones**, para hablar sobre las próximas actualizaciones de Elementos de Vivienda y Seguridad para el próximo ciclo 2023-2031. Este será el primero de una serie de talleres comunitarios que se programarán durante el proceso de planificación.

La reunión será en Zoom el **miércoles 22 de septiembre de 2021 desde las 6:00 hasta las 8:00 p. m.** Habrá traducción al español en vivo.

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Định hình tương lai của nhà ở và lập kế hoạch cho biến đổi khí hậu trong cộng đồng quý vị.

MARIN COUNTY

HOUSING & SAFETY ELEMENTS

Tham gia cuộc họp cộng đồng trực tuyến cùng chúng tôi vào ngày 22 tháng 9 năm 2021.

Tham gia cuộc họp cộng đồng tương tác trực tuyến hướng đến giải pháp cùng Quận Marin để thảo luận những nội dung cập nhật về Nhà Ở và Các Yếu Tố An Toàn (Housing and Safety Elements) sắp tới cho giai đoạn 2023-2031 tới đây. Đây sẽ là hội thảo đầu tiên trong chuỗi các hội thảo cộng đồng sẽ được lên lịch tổ chức trong suốt quá trình lập kế hoạch.

Cuộc họp sẽ diễn ra trên Zoom vào **Thứ Tư, ngày 22 tháng 9 năm 2021, từ 6 giờ chiều đến 8 giờ tối.**

Đăng ký ở đây
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hoặc quét mã QR này:

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Để nhận được hỗ trợ khuyết tật, vui lòng gọi điện thoại đến số (415) 473-7309 (Giọng nói), Dịch vụ thông qua người trung gian tại số CA 711, hoặc e-mail HousingElement@MarinCounty.org ít nhất năm (5) ngày trước sự kiện. Quạn hạt sẽ cố gắng hết sức để đáp ứng các yêu cầu ít hơn năm ngày làm việc như đã thông báo. Các bản sao tài liệu đều có sẵn ở dạng thức thay thế, theo yêu cầu của quý vị.

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Tham gia cuộc họp cộng đồng trực tuyến cùng chúng tôi vào ngày 22 tháng 9 năm 2021.

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Cuộc họp sẽ diễn ra trên Zoom vào **Thứ Tư, ngày 22 tháng 9 năm 2021, từ 6 giờ chiều đến 8 giờ tối.**

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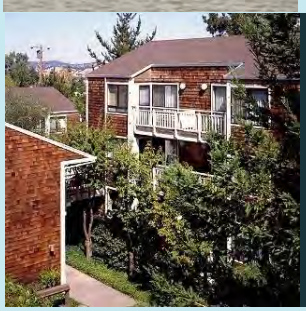

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Topics for discussion include:

- **Housing needs and conditions**, especially for low and moderate-income housing
- **Climate change adaptation measures,** including wildfire, sea level rise, and flooding concerns

The meeting will take place on Zoom on **Wednesday September 22, 2021 from 6:00-8:00 P.M.** There will be live Spanish translation.

Register here: https://tinyurl.com/MarinHousingandSafetyRSVP

Visit www.MarinCounty.org/HousingSafetyElements and subscribe to this page to receive the latest developments

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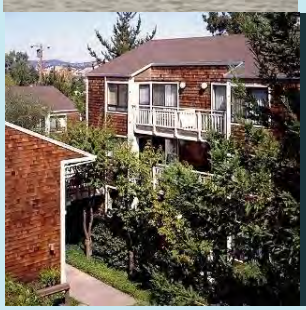

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Los temas de discusión incluyen:

- **Necesidades y condiciones de vivienda**, especialmente para grupos familiares de ingresos bajos y moderados
- **Medidas de adaptación al cambio climático,** incluyendo los incendios forestales, el aumento del nivel del mar y las inundaciones

La reunión será en Zoom el **miércoles 22 de septiembre de 2021 desde las 6:00 hasta las 8:00 p. m.** Habrá traducción al español en vivo.

Registrarse aquí: https://tinyurl.com/MarinHousingandSafetyRSVP

Visite www.MarinCounty.org/HousingSafetyElements y suscríbase a esta página para recibir las últimas novedades

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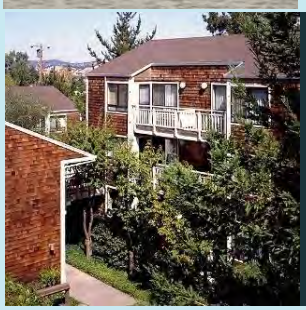


Tham gia cuộc họp cộng đồng trực tuyến cùng chúng tôi vào ngày 22 tháng 9 năm 2021.

Tham gia **cuộc họp cộng đồng tương tác trực tuyến hướng đến giải pháp** cùng Quận Marin để thảo luận những nội dung cập nhật về Nhà Ở và Các Yếu Tố An Toàn (Housing and Safety Elements) sắp tới cho giai đoạn 2023-2031 tới đây. Đây sẽ là hội thảo đầu tiên trong chuỗi các hội thảo cộng đồng sẽ được lên lịch tổ chức trong suốt quá trình lập kế hoạch.

Các chủ đề thảo luận bao gồm:

- **Điều kiện và nhu cầu nhà ở**, đặc biệt là nhà ở dành cho người có thu nhập thấp và trung bình
- **Biện pháp thích ứng với biến đổi khí hậu,** bao gồm các mối lo ngại về cháy rừng, mực nước biển dâng và lũ lụt

Cuộc họp sẽ diễn ra trên Zoom vào **Thứ Tư, ngày 22 tháng 9 năm 2021, từ 6 giờ chiều đến 8 giờ tối**.

Đăng ký ở đây: https://tinyurl.com/MarinHousingandSafetyRSVP

Vui lòng truy cập www.MarinCounty.org/HousingSafetyElements và đăng ký trang này để nhận thông tin về những diễn biến mới nhất

Để nhận được hỗ trợ khuyết tật, vui lòng gọi điện thoại đến số (415) 473-7309 (Giọng nói), Dịch vụ thông qua người trung gian tại số CA 711, hoặc e-mail **HousingElement@MarinCounty.org** ít nhất năm (5) ngày trước sự kiện. Quận hạt sẽ cố gắng hết sức để đáp ứng các yêu cầu ít hơn năm ngày làm việc như đã thông báo. Các bản sao tài liệu đều có sẵn ở dạng thức thay thế, theo yêu cầu của quý vị.

Share your opinion to shape the future of housing and climate resilience in your community.

The County is in the process of updating the **Housing and Safety Elements** of the Countywide Plan (the County's General Plan). The Countywide Plan serves as the guiding vision for the future of unincorporated Marin.

Acceda a esta información en **español** escaneando este código QR con la cámara de su teléfono.

Truy cập thông tin này bằng **tiếng Việt** bằng cách quét mã QR này qua máy ảnh điện thoại.

We want to hear from you!

Short Survey
Scan this QR code to access the survey.

Consider-It Discussion Forum
An online forum to share reactions and opinions to statements provided by the County.

Interactive Atlas
An interactive map to examine demographic data and local hazards.

Upcoming Meetings
November 15, 2021: Community Workshop #2 (out of 5)
December 7, 2021: Board of Supervisors/Planning Commission meeting

MARIN COUNTY

HOUSING & SAFETY ELEMENTS

Visit **www.MarinCounty.org/HousingSafetyElements** for more information and to access the survey, discussion forum, interactive map, and to register for meetings. Scan the QR code above with your phone's camera to access the website.

Questions? Contact staff by email at HousingElement@MarinCounty.org or by phone at (415) 473-7309.

COUNTY OF MARIN

Community Workshop Links

Community Workshop #1 (September 22, 2021): Housing Element Overview

- English: Presentation[PDF] | Video[External] | Questions & Answers[PDF]
- Español: Presentación[PDF] | Video[External] | Preguntas y respuestas[PDF]
- Tiếng Việt: Bài thuyết trình[PDF] | Video[External] | Hỏi & Đáp[PDF]

Community Workshop #2 (November 15, 2021): Safety Element Overview

- English: Presentation[PDF] | Video[External]
- Español: Presentación[PDF] | Video[External]
- Tiếng Việt: Bài thuyết trình[PDF] | Video[External]

Community Workshop #3 (January 20, 2022): Housing Element Sites

- English: Presentation[PDF] | Video[External]
- Español: Presentación[PDF] | Video[External]

Community Workshop #4 (March 29, 2022): Housing Element Programs & Policies

- English: Presentation[PDF] | Video[External] | Chat[PDF] | Mentimeter results[PDF] | Summary of feedback[PDF]
- Español: Presentación (estará disponible pronto) | Video[External]

Community Workshop (March 31, 2022): Additional Housing Sites Under Consideration

- English: Presentation[PDF] | Video[External] | List of additional sites under consideration[PDF]

Community Workshop #5 (April 5, 2022): Safety Element Programs & Policies

- Register here / Registrarse aquí

Marin County Housing & Safety Elements Community Workshop #1

Summary of Workshop Discussion

September 22, 2021

Introduction

In mid- 2021, the County of Marin began efforts to draft updates for the Housing and Safety Elements. State law requires the Housing Element be updated every 8 years. Through the Housing Element, the County must identify and plan for how the unincorporated County can accommodate at least 3569 units of housing, with a specific number of units for low and very low income, moderate income, and above moderate-income residents. State law also requires that the Safety Element be updated when the Housing Element is updated. The Safety Element is a plan that looks at geologic hazards, flooding, wildlands, and urban fires.

This was the first workshop held to engage the community in this project. The website, https://www.marincounty.org/depts/cd/divisions/planning/housing-and-safety-elements, contains more information about the project and its upcoming activities.

Workshop Purpose and Format

On Wednesday, September 22, 2021, the County of Marin and its consultants, MIG, hosted a public workshop to inform the community about the planning process for updating the Housing and Safety Elements and collect initial input on their issues, concerns and potential solutions. Following guidance from public health agencies regarding gatherings during the COVID-19 pandemic, the workshop was held virtually using online video conferencing. City staff conducted robust community outreach to publicize the event. This included social media posts on Facebook, NextDoor, and Twitter. In addition, the workshop was promoted through the County's email notifications from the website. One hundred and seventy-six (176) people registered for the event and eighty-two (82) people participated.

MIG planner Joan Chaplick served as the moderator and facilitated the meeting. Leelee Thomas, Marin County Planning Manager, provided remarks to set the context and introduced the County's project team. The workshop was highly interactive and included live polls, language interpretation in two other languages (Spanish and Vietnamese), small group discussions documented in real-time using a google sheet, and a larger discussion documented in real-time using a digital whiteboard tool. Participants could submit comments and questions throughout the meeting using the "Chat" feature. The Project Team answered questions throughout the meeting.

Agenda Topics and Engagement Activities included:

- **Introduction of the Housing Element:** Participants received a brief overview of the housing element's purpose and requirements. Participants were also asked to share a word in the chat that described Marin County and respond to six demographic questions.

Following the presentations, participants were randomly assigned to seven small groups. Each group had a facilitator and note taker, six groups were facilitated in English and the seventh group was facilitated in Spanish. Participants were invited to share issues and concerns, strategies and solutions, and questions. At the end of the discussion, all participants returned to the larger group where the facilitator from each group shared some of the highlights of the discussions.

- **Introduction of the Safety Element:** Participants received a brief overview of the safety element's purpose and requirements. In a large group discussion, participants were invited to share their issues and concerns, strategies and solutions, and questions using the chat feature. The presenters responded to questions and participant feedback was noted on a digital whiteboard that was shared with the larger group.
- **Public Comment:** Participants were provided an opportunity to verbally share any comments near the end of the meeting during the public comment period.
- **Next Steps and Upcoming Outreach Opportunities:** Participants received a brief review and a preview of upcoming outreach opportunities.

Results from the Engagement Activities

The workshop opened with an open-end question and six polling questions intended to collect basic information about the participants. For polling questions, a number "n" is provided for the number of respondents for the question. Not all participants responded to each question. This number is the basis of percentages shown unless otherwise described.

Question 1 - Where do you live? N:40

- 37.5% - Unincorporated Marin County
- 50.0% - City within Marin County (includes Belvedere, Corte Madera, Fairfax, Larkspur, Novato, Ross, San Anselmo, San Rafael, Sausalito and Tiburon)
- 12.5% - I do not live in Marin County

Question 2 - For those who responded they live in unincorporated Marin County, please tell us what part of the county you live in. N:34

- 17.6% - West Marin
- 14.7% - Unincorporated San Rafael (Marinwood, Santa Venetia, Los Ranchitos, Lucas Valley)
- 2.9% - Unincorporated Novato (Black Point, Green Point, Atherton, Indian Valley)
- 17.6% - Unincorporated Southern Marin (Tam Junction, Marin City, Strawberry)
- 5.9% - Unincorporated Central Marin (Sleepy Hollow, Kentfield, Greenbrae, San Quentin Village)
- 41.2% - I do not live within unincorporated Marin County
- 0.0% - I don't know

Question 3 - Do you work in Marin County? N:48

- 31.3% - Yes

- 16.7% - No
- 52.1% - I do not work (retired, unemployed, other)

Question 4 - How long have you lived in Marin County? N:46

- 0.0% - Less than 1 year
- 6.5% - 1-5 years
- 2.2% - 5-10 years
- 82.6% - 10 + years
- 8.7% - I do not live in Marin County

Question 5 - What is your housing situation? N:50

- 60.0% - I own my home
- 32.0% - I rent my home
- 4.0% - I live with family/friends (I do not own nor rent)
- 4.0% - Do not currently have permanent housing

Question 6 - What is your age? N:47

- 0.0% - Under 18
- 10.6% - 18-29
- 19.1% - 30-49
- 36.2% - 50-64
- 34% - 65+

Question 7 - Provide one word you use to describe living in Marin County. *Participants were asked to test the chat by providing one word to describe living in Marin County. Open-end responses are in alphabetical order with number of mentions noted in parens.*

- Beautiful
- Bendecida (Blessed)
- Blessed
- Cara (Expensive)/ Muy cara (Very Expensive)
- Community (2)
- Daunting
- Desigualdades (Inequitable)
- Entitled
- Expensive (6)
- Family
- Grateful
- Inequity
- Lovely
- Majestic
- Nature (4)
- Neoliberal
- Nice
- Not diverse
- Peaceful (3)
- Privileged
- Racist (2)
- Relaxed
- Stressful
- Traffic
- Unique
- White

Summary of Comments Received For The Housing Elements

Participants were encouraged to share their comments and ask questions using the chat feature. These responses are organized by topic and as a response to a specific question asked by the presenter or facilitator. This made for a very dynamic meeting and yielded valuable input for the project team. The following is a high-level summary of the key themes for the seven

break out groups that surfaced during the discussion. A full transcription of the breakout notes from each group is attached.

Issues & Concerns

- Housing being too expensive:
    - Wages are too low / jobs don't pay enough.
    - Rent goes up but wages don’t
    - Expensive for those living in designated affordable housing units.
    - Many need multiple jobs to pay rent.
    - Single parents, seniors, people with extraneous circumstances need more support.
    - There are sometimes up to seven people living in one unit or multiple families in one unit.
    - There is over crowdedness and units’ conditions are not great - not well maintained.
- Many have also experienced discrimination
    - How is the county preparing to meet the needs of Latinos?
    - They are a growing population group, and we need to consider how we support undocumented / immigrant residents who have additional barriers to accessing housing.
    - Racial and income equity.
        - Denied housing for resolved issues
        - Long process to apply then get denied
        - Stigma to terminology: Affordable housing
        - Nimbyism and lack of political will
- Capacity
    - Housing and affordable housing is in short supply
    - Access to evacuation routes and resources
    - Infrastructure:
        - Access to water, public transportation, power and cell service
        - Limitations with septic systems, traffic, displacement,
    - The quality of the housing conditions aren’t good
    - Hazard risk: earthquake, flooding, fires, sea level rise, etc.

Ideas & Solutions

- Build housing
    - Identify sites that are strategic (walkable, smart siting for the different categories, senior, low-income, work-force, and at different income levels.)
    - More guidance and support for a faster development/ design review process for all housing projects
    - Allow more tiny homes, ADUs, mixed use, and more creative solutions
    - Gives priority to essential workers.
    - Establish funding channel
- Work more closely with BIPOC/Latino communities.

    - Develop home ownership programs, rent to own programs, housing lottery, etc.
    - Home matching
- Work with developers so they are encouraged to build in Marin.
    - Work with BIPOC, non-profit, and community organizations.
    - Develop multi-family, affordable and sustainable housing options.
    - Increase the capacity for affordable housing within multifamily projects.
- More education and awareness so more people understand why we need to build more housing, there is a lot of push back on new affordable housing developments and programs like Homekey.

Summary of Comments Received for the Safety Elements

Participants were encouraged to share their comments and ask questions using the chat feature. These responses are organized by topic and as a response to a specific question asked by the presenter or facilitator. This made for a very dynamic meeting and yielded valuable input for the project team. The following is a high level summary of the key themes from the large group discussion. The notes from the digital white board are attached at the end of the document.

Issues & Concerns

- Earthquakes, sea level rise, drought, flooding, wildfires, power outages, and reliable cell service
- Update emergency materials and resources, marsh restoration
- Considerations for evacuation routes and procedures, access and safety to food during emergencies, alert systems, homeless population, accessible permitting and LEED.
- Area of concern is Canal Area

Ideas & Solutions

- Emergency Planning: emergency go bags, plan for the sick and at risk population, creative alert systems (sirens, text message, Comcast wire based), use hotels for shelters, and identify alternative evacuation routes.
- High tech and low tech solutions: fire resistant materials, building updates, solar power.
- Map where there is cell service
- Multilingual resources and meeting
- Integrating higher densities, tiny homes, more EV Charging, climate change adaption and changes for equity.

Next Steps

The City and MIG will share workshop results with the public and incorporate input into the development of the Marin County Housing Element. Participants were encouraged to share their responses to the survey on the website. The next workshop is scheduled for early spring.

Appendix

Breakout Room Notes

Breakout Room 1

Issues and Concerns	Strategies and solutions	Questions & Additional Comments
racial and income equity - how to offer ADUs to lower income households at below market rate. What are the incentives	County has ADU program to incentivize. HA has a landlord partnership program. Need to beef up incentive	N/A
Expense associated in providing ADU - took 2 years to build the ADU and cost of construction. Design review also an issue. Originally told it could be fasttracked but live in a design review neighborhood. Neighbor objections led to increased design review standards	Tiny homes; and more ADUs, allow to build over garage; provide rebates; form a community group to share experience	
In Marin City - HA to tear down public housing to build skyscraper housing. This strategic would eliminate Black persons living in Marin County. Black population dwindled to nothing	Lucas Valley - open space	
How do you determine where the housing is to be planned? who has the final say? Marin City - already living in a congested area	Rent to own option; county has a lottery to provide ownership opportunity	
Affordability - not sustainable even with a two-income family	housing on top of retail/multi purpose space as a solution	
Environmental factors that exist in the community - Marin City - high fire hazards, flooding, and infrastructure issues. Need to combat discriminary practice to force more housing in Marin City	1) allow tiny houses 2) end design review and go by building codes 3) allow ADU built over garages 4) provide rebates (we were told we were going to get rebates but DID NOT) 5) County should tell property owners what they should do to be able to build an ADU - rather than just shoot down every plan 6) form and support a community group of	

	property owners interested in ADUs so we can share what worked and what didn't, we learned a lot and are willing to share our lessons 7) educate our communities about the trade-off for more dense housing development is the positive preservation of the Greenbelt	

Breakout Room 2

Issues and Concerns	Strategies and solutions	Questions & Additional Comments
Adu permitting process is arduous	County provide equity dollars to make rent more feasible in interim as County works to make more housing units available	how will we find a way to follow original County Plan?
Issue of addressing septic for ADUs in West Marin	go forward with changing minds about creating housing: social issue, justice issue, economic issue. Something we all need to step up to tackle.	SB 35 not written up for communities like Marin City, which has done its part for providing low income housing.
Rental property managers seek to procure high rents, often asking renters to demonstrate they make twice the rent amount in order to qualify for the rental unit	need to talk about these issues and come to a place of embracing development and transit	
City of Sausalito and neighboring communities appealing RHNA numbers. Very problematic saying "no" early in process	Need high density to pay for open space assets we value in Marin (x2)	
intersection of environmental justice, environmentalism, and social justice: development seen as negative by environmental leftists who then push against development	County plan could transparently highlight areas that could be developed--- highlight open spaces that could be turned into developments	
Concern over County's RHNA appeal letter citing agricultural lands as reason County couldn't meet housing goals. Sense that County is subsidizing ranchers	County could work out agreements with ranchers to set aside acres for housing on ranch properties.	

and placing value on ranches over people/ housing needs. (x2)		
	If County is really serious about creating more housing, County needs to identify acreages of possible sites and carry through a public process.	
	County should work hard to identify areas outside of Marin City to do their part, areas that SB 35 is directed toward who have not provided affordable housing	
	Need safeguards to ensure housing stock does not shift from affordable unit (by intent) to non-affoprdable (in practice)	
	Build mulit-family units. Build higher. Embrace density.	
	Consider Petaluma Tomales Road for more housing, while recognizing that other deveklopment comes with housing and requires careful balance	

Breakout Room 3

Issues and Concerns	Strategies and solutions	Questions & Additional Comments
Bad Experiences: Search for housing, encountered discrimination and were unable to live in their own community. Had to report to fair housing. Need to do something to stop discrimination. 10 year waiting period. Completed affordable housing paperwork, a five hour process. Then denied for past accounts that had been resolved. Needs: education, cultural shift, and less red tape.	Cultural shift needed. Must change political climate. Elect people that make it a priority. Allow in lieu fees. Former 20% inclusionary percentage when large unit built 20% set aside for affordable units. Now 10%?	Why is it that liberals become very conservative around affordable housing. Property value fear.
Stigma: The term "affordable housing" conjurs negative	If we are never going to get housing built on areas designated in CWP then let's do	

response. Terminology problem that should be changed.	something meanigful to ensure housing is built. More actionable programs.	
Political Will: Lack of political will to get affordable housing done.	Rezoning	
Racism: noted by realtor, resident, CLAM rep. Land use and zoning, NIMBYism, large parcel in Pt Reyes Station that's difficult to subdivide to allow additional units.		
COVID has made housing situation worse and also helped many realize just how much space they do or don't need.		
Without affordable housing you won't have workers in Marin.		
825 Drake was supposed to be for affordable housing: 74 housing units with only 20 parking spaces. Apartments need external entrances rather than entrance by interior hallways? From 74 units only 7 required affordable housing. Negative impacts to nearby residences.		
Red Tape: Developers don't want to work in Marin bc it takes too much time to get entitled. High housing costs.		

Breakout Room 4

Issues and Concerns	Strategies and solutions	Questions & Additional Comments
3600 units is not meaningful - need to parse out to georgarphic areas. few parcels in San Geronimo Valley; would need to and should revist issues that have already been decided on in the past (streams, fish habitat, parking, errosion, septic systems,etc.); ADUs could work	home matching, so folks can rent out rooms - provides affordable housing	Any provisions for accommodating mobile homes, rv/s, etc. - folks living in vehicles?

Balinas - many issues - septic; septics handling ADU an issue	Accommoadte mobile homes, rv's, those living in vehicles	
social security incomes does not cover housing costs - isue of affordabililty	for substantial housing, need to unpack code - composting, greywater systems, transporation systems, etc. - consider new set of priorities	
Displacement from sea level rise and wildfires - need areas for those displaced from enviornmental hazards;	Revist ideas that have been decided in the past, e.g. streams, fish habitats , parking, etc.	
concerns about infrastructure capacity		
concerns about traffic and accommodataion of traffic		
water and fire challenges		

Breakout Room 5

Issues and Concerns	Strategies and solutions	Questions & Additional Comments
Septic is big stumbling block and huge barrier in West Marin.	help people to own homes, subdividing property, allowing duplex development, look at zoning in West Marin because there is so much space	liked slide that showed income by profession
systemic and institutional racism. Great inequality of income in County and allows segregation. need to make work force housing and prepare for elderly population.	consider community land grants, establishing a local housing trust fund, there is a guidel for establishing funding	
Not alot of programs that help people to afford homeownership over the long term	County review gallons per bedroom for septic design. Estimate is very high.	
County needs to focus on very low income people. Development seems aimed at moderate income people	tenants in common is a way to own property together without doing a lot split and getting more people in home ownership	
Reparations for Golden Gate Village.		
County should look at programs to get people into home ownership. decomotize homes - prevent investor owned.		

Breakout Room 6

Issues and Concerns	Strategies and solutions	Questions & Additional Comments
CWP encourages annexation of lands for intensification of use, especially lands that are next to the Town of San Ansemlo. Puts a large burden on smaller town staff.	Change policies to not allow up-zoning of properties right next to small towns.	
Changes culture of smaller towns. High density housing impacts on our psyche. Cultural impacts and overburdened infrastructure.		
High density of housing in Canal area created issues during COVID. Expensive rents.Most people had to work in the public during COVID and the disease spread. Affordable housing options need to be increased. High density needs to be planned correctly so that it prevents over-crowding.	Larger units so that people aren't so cramped.	
Finding sites that are walkable, flat area for development. Site locations need to be carefully selected. Getting appropriate builders to build the sites. Builder is able to come in under SB35 and build without local input.	Non-profits need to be involved in selecting sites. Smart siting for the different categories, senior, low-income, work-force, and at different income levels. Beyond the siting, what actually occurs and what we can provide for incentives to get the type of housing that we'd like to see.	
Retention of existing housing stock. New construction and the generation of new units to meet targets. Modification of existing stock. Having various housing options. Through remodels, houses are getting bigger and bigger. Larger multi-family units is very much needed.		

Breakout Room 7 – Spanish

Issues and Concerns / Sus inquietudes y problemas	Strategies and solutions / Sus ideas para estrategias y soluciones	Questions & Additional Comments / Preguntas
Primera ves en estas reuniones, vive en arae de Canal - Voces de Canal, esperiencias, rentas son demaziodo caras, no son unidades muy bien cuidaded, no muy bien acondicionadas para vivir, los incrementos de renta son muy algos	give priority that all County land is able to built more housing, and dedicate it to essential workers first	Questions on if there is funding available from the County to help developers actually build the units we need
vive en apartamentos, es accequible, ahora tiene un mejor trabajo de antes, antes su salario era de $9/hora, y luego cambio trabajo de $18/hora, pero en el 2010, ella perdio uno de esos trabajos, y ya no le alcanzaba para pagar (low-income housing) and she got 4 jobs and asked for help to orgs to get rent subsadies, she has kids and lived with mom, and she was able to get more jobs to maintain herself, now her job is better to cover her expenses. Even with affordable housing, the jobs in the county are too low (min wage - $15 is still too low), it is not enouhg, specially if Im a single mother	haser consciencia - educate the community that affordable hosjing is needed, lives in Mill Valley and she is supporting a current development there, but a lot people are against it and fight back against development, also supporting HomeKey and there is a lot of push back, need a good education campaign that it is needed to build more housing and and why its needed	
Isabel - Canal community, need to have rent control, rents are too high and always increasing, but the job wages don't increase, sometimes there are multiple families living in one unit, up to 7 people in one unit! this is a problem that causes even more problems, we are all more essential workers, they should build more housing that can be dignified housing	if there are companies offering jobs in the county - they should coordinate and give funding to the County	
Arlin Venavides - manager de Planificacion de Equidad del Centro Multicultural - there is a	(In chat) Myrna, regarding the last question, it's important that the County engage more deeply	

need not only to plan housing that is affordable, we need to actually build them as well - noticed in the DATA: lots of Latinos moving to Marin County, but we don't see the opportunities for these populations to succed in the County, recomendations to see how we can coordinatw with other parts of the coutnty to build more affordable hojsing, need to be we'' connected to transporation, to connect to jobs. people need multiple jobs to stay/maintain hosuing here	and authentically with BIPOC communities. As you see today, there were only 4 community representatives. That is not enough, unfortunately. The County also needs to connect BIPOC communities with developers, so communities have direct communication with developers, as they ultimately make decisions to build not the County.	
marta - also important to consider opportunities for immigrants, becaus they dont have papers, they are unable to find better hosing, limits to poortunities,this is why they live in apartmetns and have to share housing with others, there is a lot of inequality for this group, the county should see how they can help people to apply without legal documents		
her sister was denied an apartment and she felt it was discrimination because she was latina, and if the latino population is growing in the county, how can we help them		
isabel - they pay rent but if they want to move to another place, the landlord will increase the rents, or the new apartment will be much more expensive, and the conditions of the apartmetns are not good.		

Marin Housing & Safety Element 9/22 Workshop

Safety and Natural Disaster Preparedness

Issues & Concerns

Ideas & Solutions

Questions

Marin County Housing and Safety Elements

Virtual Workshop #1

September 22, 2021

Whiteboard

Chat

The Chat comments attached have been modified to remove the names of participants.

- Unincorporated
- "We are offering live interpretation in Spanish during this meeting.
- If you wish to hear Spanish interpretation, please click the Interpretation button at the bottom right of your Zoom screen (you'll see a globe icon).
- If you are joining via the Zoom smartphone app, select your language by clicking "More" or the three dots in the bottom right corner of our screen. Select "Language Interpretation," then choose "Spanish" and click "Done." If you wish to hear only the interpreters and not the original speakers, be sure to click Mute Original Audio.
- EVERYONE must choose a language. Do not stay in the default off."
- "Estamos ofreciendo interpretación en vivo en español durante esta reunión.
- Si desea escuchar la interpretación en español, haga clic en el botón Interpretation (interpretación) en la parte inferior derecha de la pantalla Zoom (verá un icono de globo terráqueo).
- Si se está uniendo a través de la aplicación Zoom para smartphone, seleccione su
- idioma haciendo clic en ""More"" (más) o en los tres puntos en la esquina inferior derecha de la pantalla. Seleccione ""Language Interpretation"" (interpretación del idioma), luego elija "Spanish" y haga clic en ""Done"" (listo). Si desea escuchar solo a los intérpretes y no a los oradores originales, asegúrese de hacer clic en ""Mute Original Audio"" (silenciar audio original).
- TODOS deben elegir un idioma. No se quede en la posición de apagado predeterminada."
- beautiful
- Priviliged
- Blessed
- Lovely
- Racist
- Expensive
- community
- Majestic.
- expensive
- White
- Peaceful
- Expensive
- nature
- Peaceful
- family
- Nature
- peaceful
- racist
- Expensive

- Nature
- expensive
- not diverse
- Community
- relaxed
- Muy cara
- Nature
- Unique
- Expensive
- Cara
- Neoliberal
- Lately, stressful
- entitled
- Nice
- traffic !
- Bendecida
- Grateful
- Daunting
- desigualdades
- ^^
- Inequity
- "Seleccione el icono del globo del mundo para elegir el idioma que desea escuchar para esta reunión.
- Nhan vao dau hieu qua dia cau de chon ngon ngu cho buoi hop."
- Beautiful
- beautiful
- can you share the slides after the meeting?
- Materials will be posted on the website
- can you share the URL?
- https://www.marincounty.org/housingsafetyelements
- thank you
- is this data for county as whole or the unincorporated areas?
- charts say data is for unincorporated areas
- AIRBNB RENTERS OR regular renters??
- are houseboats and floating homes included in the mobile homes number?
- Renters include short-term AirBnb?
- Why are we only talking about unincorporated areas? Looks like I missed something
- Each city and town has their own Housing Element process
- The County's jurisdiction only includes unincorporated areas of Marin County
- @Jim Nunally & Hilary Perkins - the figures for renters do not include short-term rentals
- @Aline it would be great to know how much of long-term rentals have been lost to AirBnB
- Jim and Hilary- We will see if we can get this information for you, if so we will post it to our website: https://www.marincounty.org/depts/cd/divisions/planning/housing-and-safety-elements

- what is HCD?
- The State's Housing and Community Development Department
- @sybil Boutilier - yes, they are included in this figure
- Use this website: http://gis.marinpublic.com/lookup/JurisdictionLookup/
- if you don't know if you live in unincorporated or incorporated
- Please break down the target number of units into a smaller target area by area in Unincorporated Marin. I live in San Geronimo Valley. What is the target number of units for SGV? This is the starting point for any conversation. Targeting 25 units would be one conversation. Targeting 200 units would be a different conversation. Thanks.
- Hi Alan- we do not have target numbers yet in the process. At this time, we are doing our needs assessment and doing a search of all sites in the County.
- thank you! how is this different from Make Room Marin?
- How does SB 9 & 10 affect the Housing Element?
- Will Marin County consider rezoning/subdividingin west marin ?
- Is it correct, that the county only needs to "plan" and not build? Why is that so?
- https://adumarin.org/
- ADU (Accessory Dwelling Units)= Second units
- In SGV, I believe, most of the opportunity would be ADUs (backyard cottages) on existing properties that currently have one single family home. This conversation would bring in every development topic that has been discussed in the past years… water, fish habitat, parking, septic, etc. Is the intention to have this conversation in the context of the Housing Element?
- What happens if the county does not meet the RHNA goals?
- who should you contact if you want to explore doing ADUs? is there help for homeowners to do this?
- Give the fact that RHNA does not require that units be built, isn't it possible that the County could simply identify potential sites but never deliver on actually building affordable housing units? Is it true the Marin is challenging their RHNA numbers? If yes, why?
- For successful affordable housing development, the County needs to allow developers to build 70+ units on a site. The numbers don't work otherwise.
- The Marin Water District is putting restrictions on building new units. How will this affect the House Elements plans?
- Is agricultural acreage considered available or underutilized for housing? If so, why is the County appealing the target? If not, why not if the rancher is willing to develop or sell for development?
- @Jannick We just built one, affordable rent, teacher renter, contact us if you want what happened for us hilary@hilaryperkins.net
- A follow up question to that is what is we meet the goal of planning but there is no building/implementation?
- Is unincorpo
- County website with incentives for ADU development in unincorporated Marin: https://www.marincounty.org/depts/cd/divisions/housing/accessory-dwelling-units
- If you build an adu now, iwill it qualify for RHNA numbers for next housing element cycle?
- FYI our experience building a TINY ADU for a local teacher was a NIGHTMARE due to neighbors and the County Government obstacles

- What kind of financing assistance does the county have for affordable housing developers in terms of capital subsidy?
- Are there any incentives to individuals who would like to build an ADU for the ADUs to be offered to low or low income
- But why are the RHNA numbers being challenged?
- Black in Marin City have gone from more 90% after WWII due to restrictive zoning and denial of mortgage to @ 23% due to gentrification. Their children can not afford to live there. Why doesn't RHNA block SB 35, etc from over riding community interest. Example 825 Drake Ave
- I can help rent the ADU. Im director of Home Match Marin. Call me 707-837-6511
- @Maureen here is info on the Board's RHNA appeal https://www.marincounty.org/depts/cd/divisions/housing/housing-element/regional-housing-needs
- Email with questions: affordablehousing@marincounty.org
- How does Marin justify allotting 20% of Measure A funds to paying ranchers to not allow development?
- Para Español - Si quiere participar en un grupo pequeño en Español, por favor levante la mano.
- "Seleccione el icono del globo del mundo para elegir el idioma que desea escuchar para esta reunión.
- Nhan vao dau hieu qua dia cau de chon ngon ngu cho buoi hop."
- Wishing that politicians would focus on Extremely and Very Low Income Households when permitting development.
- Income----------2017
- Categories----------Number-of-persons-in-Household
- %-of-median-income---------1---------2----------3----------4
- Extremely-Low-30%------27,650---31,600---35,550----39,500
- Very-Low-Income-50%---46,100---52,650---59,250----65,800
- Low-Income-80%----------73,750---84,300---94,850---105,350
- Median-Income----------80,700---92,250--103,750--115,300
- Moderate-Income-120%--96,850--110,700--124,500--138,350
- Agree we need to focus on extremely low and very low mixed with low so we can house our essential personnel
- Are earthquakes included?
- Yes, earthquakes are included
- Lauea - Did I hear you right that your group suggested that city's and/or urban areas should take up more of the housing load? Meaning that less developed or rural communities do not need to accommodate more housing? That is a controversial position that should be discussed further - everyone should take on their fair share, it is not appropriate to delegate it to populous areas that are already accommodating substantial housing.
- I'd like to suggest a radical improvement to this Meeting Process with an example:-
- So I go to this huge "Plan Bay Area" meeting. Dozens of people want to speak which they do, but close to the very end of the meeting and they only get 2 minutes each.
- This is a classic example of what's wrong with the process. So let me recommend an improvement at this time when so many more people can now contribute.
- More than half of the public speakers ask questions or make comments that:-

- ---- already have been answered in the documentation,
- --- repeat previous questions/comments or
  - are off topic.
- And then, when I get up to ask my important and unique question I get no reply !
- Then its the turn of the Experts to make their comments, some of which should instead have been documented prior to the meeting and would have answered some of the questions that were asked by the public earlier.
- And none of them fully answer my question !!
- Also - those Expert's comments should not be suddenly revealing NEW informatio
- I was a member of Sausalito's Landslide Task Force after our 2/13/2019 landslide. We found we have terribly outdated mapping. How is the county helping update them?
- Hi Micky,
- Hi Micky, African American 24.8%
- White (only) 29%
- Asian 8.4%
- Multiracial 7.4%
- Hispanic 12.4%
- American Indian/Native Alaskan .441%
- Other Hispanic 15.1%
- Multiracial Hispanic .882%
- Multiracial (Non-Hispanic) 7.47%
- Black (Hispanic) N/A
- Other (Non-Hispanic) 1.32%
- NEW information either.
- Instead of one-way hype that can invariably be the content of any Meeting, there should be a Facebook-like Page which gives constant 2-way feedback 24/7 365.
- Not just the 2 minutes the public gets to speak at a meeting with zero feedback.
- But Councilors, Planners, Experts and Staff etc.. need to actively participate in this Facebook-like Page. Answering and RANKING ALL questions. With Links added to the relevant documentation.
- A " Facebook-like Page" should be MANDATORY as it records the knowledge exchanged.
- Enable the Facebook-like page and Agenda DAYS BEFORE any meeting.
- Any incorrect public opinions need to be speedily and factually corrected by an expert and LIKED/UNLIKED upward/downward in ranking (by the public) so only the highest voted comments and questions appear at the top. (else irrelevancies totally dilute the whole discussion and bury the important information) .
- Questions or comments do NOT NEED TO BE REPEATED as, instead, an existing comment can simply be v
- Marin City Demographic percentages
- Opps our landslide was 2/14. We were working with 50 year old topo maps.
- How specifically does the Housing element integrate the vulnerability assessment and Safety Element?
- will you be studying the adequacy of evacuation routes for wildfire? I think often of Paradise fire.
- can simply be voted up/down by others.

- And now we also have a complete record of what happened and not some précis of MINUTES that invariably miss half of what REALLY went on!
- By relying solely on the BOG STANDARD Community Meeting you are asking to be continually accused by the public of NOT LISTENING and IGNORING them . Think about how much easier it would be to reply to those comments with -- "But I did answer that - it's on this Facebook-like page, here. And then you put the link into ZOOM CHAT !"
- Requiring anything that is WRITTEN to be submitted 36 hours in advance by email is NOT a 2-way communication.
- And 2-way communication immediacy is what we now need !
- We need Politicians, Staff and Experts to make a commitment to finally put themselves out there and put themselves on the record by replying to the public on this Facebook-like Forum.
- Would drought be a part of this? IE ways that we need to amend water provision and radically make easier re-use and recycled water?
- My parents lost their home in the Tubbs Fire, and they evacuated only because neighbors helped neighbors. The alert system was non-existent. What will Marin County do to ensure that residents are updated in real time when a disaster strikes?
- is BDCD working with County on sea-level rise issues for coastal residents?
- *BCDC
- Will we be receiving a copy of the slides that have been presented tonight? I am so appreciative of County staff who participated in tonight's meeting. It was informative and you have now received valuable feedback, a number of us who are on the front lines of working to create more affordable homes. There are many areas where the County could adjust existing policies, update septic requirements that today significantly restrict our ability to create new housing units. And how about legalizing tiny homes as they have in Sonoma County? So many opportunities to create more affordable homes if only the County would make a serious commitment to change policies. Again, thanks for tonight's session.
- "Resources for more information: https://www.marincounty.org/depts/cd/divisions/planning/housing-and-safety-elements
- Para obtener información adicional y recursos, consulte: https://www.marincounty.org/depts/cd/divisions/planning/housing-and-safety-elements"
- BCDC just covers SF Bay, not ocean. They are working on it. Cal Coastal Commission handles Pacific coast.
- What plans are in place to reach the unhoused during a disaster?
- If the county is determined to still put a 20 unit short term and long term resident hotel at 150 Shoreline, Manzanita on a platform that raises the building 3' above the FEMA flood zone, it makes no raise the building if resident's cars and all other buildings are flooded in heavy rain-high tide events that are the same height as the the Manzanita Park and Rice
- Building on shorelines
- Sea Level Rise
- lead coordinated Countyi efforts
- Power needed during PGE outages. How about neighborhood solar installations where a sunny home could provide solar generated electricity to its neighbors during an outage?
- countywide efforts - events don't stop at jurisdiction lines
- Please include impacts of disasters on the unhoused community

- Maintenance of statewide emergency response system, including county, and municipal response.
- When will we face that we may have to retreat from WUI and Shorelines
- Everyone ought to have grab & go bags ready for evacuation. Pre-planning is so important to not have regrets (lost documents, photos, etc.). The public needs more reminders.
- Cell phone service is still completely non-existent in large parts of the unincorporated county! My home in Tam Valley has never had reception, on any carrier. What can the county do to proactively enable cellphone service, by working with at least one phone carrier, so that we are not completely cut off in an emergency?
- Fire prevention starts with building upgrades (fire resistant materials, gutter guards, etc.), but no funding to assist homeowners. Instead, all the money seems to be going to tearing out trees and vegetation without regard to wildlife
- Unhoused numbers too low. Not all are in Novato, San Rafael and the Bay Model in Sausalito
- in general, is there a safe number of people for an area, in terms of evacuations and water etc... can we keep growing in general due to the various safety factors?
- Low-income residents have a harder time replacing lost food during a disaster. Can we include an acknowledgment that they should receive the resources needed to replace lost food?
- County should have a well-publicized directory of emergency shelters when disaster strikes. Will specific emergency shelters be included in Safety element?
- Una preocupación es que la comunidad Hispana no tiene la información necesaria para un caso de desastre, ni los recursos.
- En él área de canal no tienen un botiquín de primeros auxilios o de emergencia no están preparados para un desastre natural
- Contamination of our dwindling reservoir water supply if a fire
- What happens to renters when their units are damaged?
- There should be a plan in place for the sick and shut in when disaster hits
- Suggested solution: have the county figure out which parts of the unincorporated county has no cell service whatsoever (Tam Valley and Highway 1 / Shoreline is particularly bad, despite having huge numbers of tourist traffic). Can we map the dead areas, along with the topography?
- People can lose their medication or forget it in a disaster. Have pop-up pharmacies available for people who desperately need their meds.
- What can the county do in terms of, if water levels affect us in the Canal area?
- Crear un seguro comunitario para proteger las pertenencias de personas con bajos ingresos
- Increased use of small form EV vehicles to reduce pollution and traffic. Electric bikes and very small autos. Providing a lane for these vehicles on roads.
- I am concerned about the high tech solutions provides that exclude low tech elders … for ex, alerts on cells, when in Hawaii, they have sirens.
- Explore planning for more distributive energy sites so when PG& E goes down it is less disruptive
- identify alternate evacuation routes when main corridors are blocked or underwater.
- Tiny homes could become put on floats to become future floating homes like the Floating Homes Community on Gate 5 and 6 Road and Commodore. /they could attach to shore lines later. Also flooding of utilities on low lying roads and US 101
- And then solution #2: use those new maps of no-cell-service to figure out if the county owns any nearby parcels of land, which do not have to be very large at all, to work with a carrier to install

a new cell tower. These do not have to be very large; 5G can be installed on existing power poles. But the county needs to reach out to carriers to make that happen.

- Restore our marshes
- didn't the BCDC say no more marinas could go into Richardson Bay?
- could hotels in safe area be used as shelters in a disaster funded by special funds.
- Increased use of small form EV vehicles to reduce pollution and traffic. Electric bikes and very small autos. Providing a lane for these vehicles on roads.
- Some issues relate to large systems (utility systems) versus individual needs. Work with existing organizations on the ground who are connected to communities to ensure personal needs are met (Marin County Cooperation Teams, for example).
- I am a bit concern on the low income people are always affected in terms if there was a disaster.
- Regarding marinas in Richardson Bay, it would be very difficult to get permits for a new marina. I'm not aware of any outright ban on marinas.
- Use Comcast's wire based network to broadcast alerts
- Map non-road evacuation routes. Fire roads and trails.
- Thank you for your presentation and allowing for participation. We are all in this together. ☺
- Debemos almacenar comida qy bióticos
- Suggestion: if/when you eventually make a list of shelters for future disasters, make sure to clearly include for each location whether or not pets can be included at that shelter. One of the main reasons people don't evacuate is that they don't know where to go with their pets; even hotels will often not allow them in.
- A second exit for Marin City
- Helping low income folks to acquire go-bags.
- is the Marin community foundation involved in helping the county on those issues with grants?
- Marin Bike Coalition has that map of trails
- The County has received several grants from Marin Community Foundation to address climate change and equity.
- Thank you to all yall, this was very helpful and interesting and well-done. We appreciate the hardworking County staff. We wish the County leadership was less afraid of upsetting the NIMBY residents who no matter what will be upset with denser development.
- thanks for offering spanish
- Where's the Facebook-like Tool ?
- Another resource: Mill Valley has the "Steps, Lanes, and Paths" map, for cleared small walking trails (not usually seen on online maps) that can be used for evacuation. Other towns may have similar projects. https://www.cityofmillvalley.org/civicax/filebank/blobdload.aspx?blobid=27475
- Resources for more information: https://www.marincounty.org/depts/cd/divisions/planning/housing-and-safety-elements
- Para obtener información adicional y recursos, consulte: https://www.marincounty.org/depts/cd/divisions/planning/housing-and-safety-elements
- Thank you so much!
- One last Stop allowing one house to be build ton 2 lots
- Gracias
- Thanks!

Marin County Housing & Safety Elements Community Workshop #1

Summary of Workshop Discussion

November 15, 2021

Introduction

In mid- 2021, the County of Marin began efforts to draft updates for the Housing and Safety Elements. State law requires the Housing Element be updated every 8 years. Through the Housing Element, the County must identify and plan for how the unincorporated County can accommodate at least 3569 units of housing, with a specific number of units for low and very low income, moderate income, and above moderate-income residents. State law also requires that the Safety Element be updated when the Housing Element is updated. The Safety Element is a plan that looks at geologic hazards, flooding, wildlands, and urban fires.

This was the second workshop held to engage the community in this project. The website, https://www.marincounty.org/depts/cd/divisions/planning/housing-and-safety-elements, contains more information about the project and its upcoming activities.

Workshop Purpose and Format

On Monday, November 15, 2021, the County of Marin and its consultants, MIG, hosted a public workshop to inform the community about the planning process for updating the Housing and Safety Elements and collect input on their issues, concerns and potential solutions. Following guidance from public health agencies regarding gatherings during the COVID-19 pandemic, the workshop was held virtually using online video conferencing. City staff conducted robust community outreach to publicize the event. This included social media posts on Facebook, NextDoor, and Twitter. In addition, the workshop was promoted through the County's email notifications from the website. Eighty –four (84) people registered for the event and thirty one (31) people participated.

MIG planner Joan Chaplick served as the moderator and facilitated the meeting. Leelee Thomas, Marin County Planning Manager, provided remarks to set the context and introduced the County's project team. The workshop was highly interactive and included live polls, language interpretation in two other languages (Spanish and Vietnamese), and a larger discussion documented in real-time using a digital whiteboard tool. Participants could submit comments and questions throughout the meeting using the "Chat" feature. The Project Team answered questions throughout the meeting.

Agenda Topics and Engagement Activities included:

- **Safety Element and the County's response to Climate Change:** Participants were first asked respond to six demographic questions. Participants received a brief overview of the safety element's purpose. They were informed about the Marin County's current and future role in responding to climate change. Participants were asked respond to two

questions regarding hazardous events in their neighborhood. The presenters responded to questions and participant feedback was noted on a digital whiteboard that was shared with the larger group.

- **Environmental Hazards:** Presenters described the eight types of hazards and how Marin County is impacted by the hazard. In a large group discussion, participants were invited to share their issues and concerns, strategies and solutions, and questions using the chat feature. The presenters responded to questions and participant feedback was noted on a digital whiteboard that was shared with the larger group.
- **Vulnerability Assessment:** Presenters described the process for assessing risks for certain populations, groups and areas. Presenters shared that they are developing responsive policies for the various hazards.
- **Atlas:** Presenters demonstrated a mapping tool for the housing and safety elements to access information about area properties.
- **Housing Element Update:** Participants received a brief update of the housing element's outreach activities, and the ideas have been shared. Participants were also asked to share a word in the chat that described Marin County. Participants were invited to share issues and concerns, strategies and solutions, and questions.
- **Public Comment:** Participants were provided an opportunity to verbally share any comments near the end of the meeting during the public comment period.
- **Next Steps and Upcoming Outreach Opportunities:** Participants received a brief review and a preview of upcoming outreach opportunities.

Results from the Engagement Activities

The workshop opened with six polling questions intended to collect basic information about the participants. For polling questions, a number "n" is provided for the number of respondents for the question. Not all participants responded to each question. This number is the basis of percentages shown unless otherwise described.

Question 1 - Where do you live? N:17

- 35.5% - Unincorporated Marin County
- 52.9% - City within Marin County (includes Belvedere, Corte Madera, Fairfax, Larkspur, Novato, Ross, San Anselmo, San Rafael, Sausalito and Tiburon)
- 5.9% - I do not live in Marin County
- 5.9% - I work in Marin but live outside of Marin County

Question 2 - For those who responded they live in unincorporated Marin County, please tell us what part of the county you live in. N:14

- 21.4% - West Marin
- 7.1%% - Unincorporated San Rafael (Marinwood, Santa Venetia, Los Ranchitos, Lucas Valley)
- 0.0% - Unincorporated Novato (Black Point, Green Point, Atherton, Indian Valley)
- 14.3% - Unincorporated Southern Marin (Tam Junction, Marin City, Strawberry)

- 7.1% - Unincorporated Central Marin (Sleepy Hollow, Kentfield, Greenbrae, San Quentin Village)
- 50.0% - I do not live within unincorporated Marin County
- 0.0% - I don't know

Question 3 - Do you work in Marin County? N:18

- 38.9% - Yes
- 22.2% - No
- 38.9% - I do not work (retired, unemployed, other)

Question 4 - How long have you lived in Marin County? N:18

- 0.0% - Less than 1 year
- 0.0% - 1-5 years
- 0.0% - 5-10 years
- 94.4% - 10 + years
- 5.56% - I do not live in Marin County

Question 5 - What is your housing situation? N:18

- 55.6% - I own my home
- 27.8% - I rent my home
- 16.7% - I live with family/friends (I do not own nor rent)
- 0.0% - Do not currently have permanent housing

Question 6 - What is your age? N:20

- 0.0% - Under 18
- 10.0% - 18-29
- 10.0% - 30-49
- 25.0% - 50-64
- 55.0% - 65+

Question 7 - What's one word that comes to mind when you think about Climate Change and Marin County. *Participants were asked to test the chat by providing one word to describe living in Marin County. Open-end responses are in alphabetical order with number of mentions noted in parens.*

- Air quality
- Consumption
- Drought
- Emission
- Fire
- Fire cycle
- Fireplace wood smoke
- Flooding (3)
- Inaction
- Multi-hazard
- Not enough has been done
- Smoke
- Vulnerability
- Water
- Wildfire (2)

- Worry

Question 8 - In the past 5 years, which of the following hazards have you experienced at your home or neighborhood? N:20

- 25.0% - Flooding
- 0.0% - Landslide or subsidence
- 5.0% - Storm damage to your residence
- 20.0% - Damage or loss of trees due to high winds or storms
- 35.0% - Threat of wildfire
- 15.0% - None of the above
- 0.0% - Other

Question 9 - What has been your experience during extreme heat events in the last five years? N:21

- 66.67% - My home keeps me reasonably comfortable
- 28.57% - My home provides little relief for extreme heat
- 0.0% - I am forced to be outside (due to my job or lack of housing)
- 0.0% - The cooling centers provided by the County have offered some relief
- 0.0% - I'm able to temporarily re-locate during extreme heat
- 4.76% - None of the above

Summary of Comments Received for the Safety Elements

Participants were encouraged to share their comments and ask questions using the chat feature. These responses are organized by topic and as a response to a specific question asked by the presenter or facilitator. This made for a very dynamic meeting and yielded valuable input for the project team. The following is a high level summary of the key themes from the large group discussion. The notes from the digital white board are attached at the end of the document.

Hazard

Drought

- Drought is an endemic part of the historic climate of Marin.
- Use native plants that survive dry summers
- Point Reyes: The water table is low & sea water from the bay has increased the saline in the water to very unhealthy levels
- Point Reyes: Having to get water from a delivery program

Flooding

- Need more ways to capture water during rainfall and store in local cisterns
- Local ordinances could look at balancing the need to capture water with the need to provide for healthy streams.
- Hwy 1 (Shoreline Hwy)
- MMWD has a rain barrel and cistern rebate program
- Inundation of septic systems
- Marin City cut off dangerously by flooding

- Keep storm drain clear
- Study successful methods for building in flood planes
- May need to do more building on flood planes to reach RHNA numbers
- Providing floating housing to deter flooding

Extreme Heat

- Western Marin stays a little cooler and it is manageable without A/C
- Provide more assistance to get people off wood burning home heating
- Multi-unit projects design guidelines should include AC
- Could look at other means of controlling indoor temperatures
- Using insulation, air flow and building orientation
- New housing design needs to include HVAC systems that can address that.
- Use electric-based heat.

Sea Level Rise

- Take into account areas subject to sea level rise
- Avoid building in areas that are subject to increasing risk in coming decades
- Dispersion of toxic chemicals in soil
- How does wildfire risk/sea level rise factor into the identification of suitable sites, while keeping affirmatively furthering fair housing at the forefront of this work?
- The most exclusive communities are where there is the highest risk in our county

Severe Weather

- Mitigate wind impacts by under grounding utilities
- Consider providing air purifiers to clean indoor air to vulnerable populations

Wildfire

- Stop building in the WUI
- Wildland fire is not a risk, building fires are a risk
- Prescribed burns
- A program that prevent and mitigate the indirect impact of wildfires on residents, primarily regarding the air quality.
- Indirect impact of the bad air quality during wildfire seasons
- Affect at home businesses and the health & safety of children / teachers.

Landslides - None

Subsidence - None

Summary of Comments Received For The Housing Elements

Participants were encouraged to share their comments and ask questions using the chat feature. These responses are organized by topic and as a response to a specific question asked by the presenter or facilitator. This made for a very dynamic meeting and yielded valuable input for the project team. The following is a high-level summary of the comments and questions that were made.

Ideas

- Is there a map of suitable sites available for public review that the county has identified?
- Consider allowing backyard cottages to utilize electric or composting toilets and gray water systems that do not impact existing septic systems in West Marin.

- Consider utilizing new innovations in modular construction, solar panels, air flow, insulation and space utilization
- Make comfortable housing, reduces cost and impact on utilities.
- Possible homekey acquisitions, would those units count towards our RHNA goals?
- Re-visit building codes and other ordinances
- Has the county identified how many possible units of housing can be added as a result of SB 9 & 10?
- How will the county be meeting AFFH requirements?
- Consider expanding the effort to identify sources of funding to fund community land trusts and the use of innovative modular construction methods to reduce construction costs.
- Consider using some of the new infrastructure funds just signed into law
- Consider using some of the south facing slopes in Marin Open Space for substantial solar panel installations.

Issues & Concerns

- Existing conditions: risks, vulnerability before completion
- Answer various question on how to provide housing to various income levels with a equity lens
- How do plan to incentivize developers to build low truly affordable housing?
- Does unincorporated Marin County have any affordable housing overlay zones?
- Is land cost a factor for affordable housing development?
- What two projects are happening in Marin City?
- Marin City has only one road as the entrance & exit for residents is a major obstacle to the construction of additional housing units there.
- Will it also include Racially Concentrated Areas of Affluence, as defined by HCD?
- How will the county prepare people for the upcoming Climate changes?
- Reducing dependence on carbon-based energy versus some sacrifice of the beauty and natural values in the open space? A careful assessment could be made to see if there might be an appropriate use of solar-generated electricity.

Public Comment

There were three people who participated in public comment, below is a high level summary of their comments and question for the city's consideration.

- Multi-unit guideline - incorporate child care infrastructure
- To supply child care with mixed use/ creative uses
- What are examples of actions that the county takes, once potential sites are approved for affordable housing?
- Have funding available to match the dollars, County has a housing trust fund, funds are transferred for the board, variety of sources
- County staff there to support to support the work, specifically the HE
- Need the sites from the HE to have the development
- HE is for ALL income level , low income is the most difficult to plan

- Seem that there is a lot to juggle open space/ building codes/ ordinance/ legacies/ Disaster preparedness
- Wondering about how it is being prioritized?
- How to balance while also incorporating low income housing?
- Is Golden gate village family public housing included in the HE, Preservation?
- Focused on adding unit but evaluates any potential lose of affordable units : ex expire beat restricts
- Marin City evaluation for safety and housing?
- A lot of projects in the works

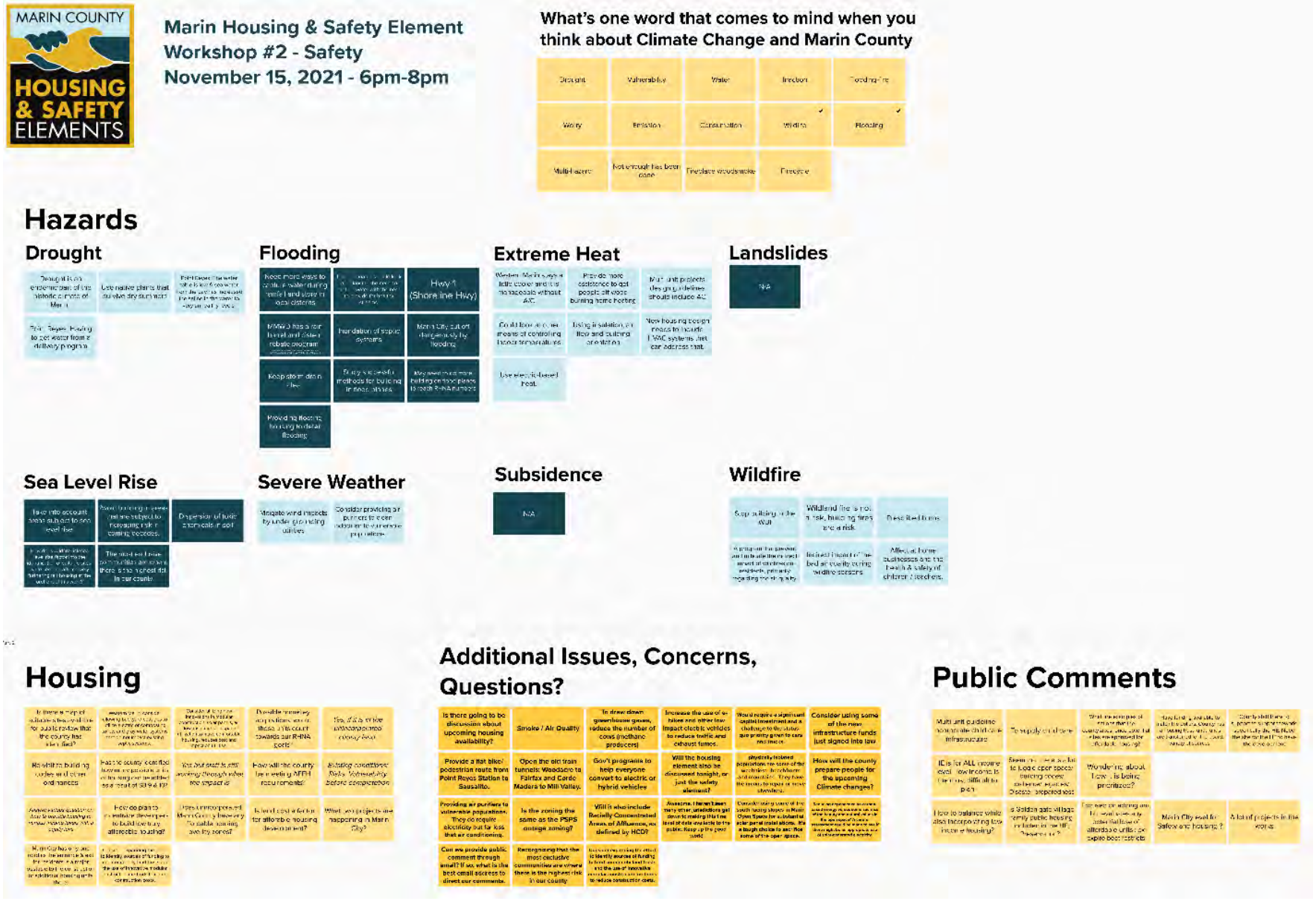
Next Steps

The City and MIG will share workshop results with the public and incorporate input into the development of the Marin County Safety and Housing Element. Participants were encouraged to share their responses to the survey on the website. The next workshop is scheduled for early spring.

Appendix

Wallgraphic

Chat


MARIN COUNTY
HOUSING & SAFETY ELEMENTS
Marin Housing & Safety Element
Workshop #2 - Safety
November 15, 2021 - 6pm-8pm
What's one word that comes to mind when you think about Climate Change and Marin County
Drought
Vulnerability
Water
Inaction
Flooding
Wildfire
Hazards
Drought
Flooding
Extreme Heat
Landslides
Hwy 1 (Shoreline Hwy)
Sea Level Rise
Severe Weather
Subsidence
Wildfire
Housing
Additional Issues, Concerns, Questions?
Public Comments

Chat

The Chat comments attached have been modified to remove the names of participants.

- Language Interpretation
- Interpretación de idiomas
- Ngon ngu phien dich
- Select the globe icon to choose the language you want to listen to for this meeting.
- Seleccione el icono del globo del mundo para elegir el idioma que desea escuchar para esta reunión.
- Nhan vao dau hieu qua dia cau de chon ngon ngu cho buoi hop.
- Is there going to be discussion about upcoming housing availability?
- Live in Novato
- We are discussing a plan for housing in the future. If you have immediate housing needs, please email affordablehousing@marincounty.org
- Thank you
- What's one word that comes to mind when you think about Climate Change and Marin County
- Drought
- Vulnerability
- Water
- inaction
- flooding-fire
- Worry
- Emission
- consumption
- wildlife, flooding
- Multi-hazard
- not enough has been done
- Wildfire
- fireplace woodsmoke
- Flooding-firecycle
- https://emergency.marincounty.org/pages/evacuation
- Relatively speaking, western Marin stays a little cooler and it is manageable without A/C
- Need more ways to capture water during rainfall and store in local cisterns and the local ordinances could look at balancing the need to capture water with the need to provide for healthy streams.
- Thank you Alan. We will keep this chat and refer back to good recommendations like this one as we start thinking about updates to our Safety policies.
- Hwy 1 also f;oods
- Hwy 1 Shoreline Hwy also floods
- MMWD has a rain barrel and cistern rebate program: https://www.marinwater.org/sites/default/files/2020-09/Rain%20Barrel%20and%20Cistern%20Rebate%20Form.pdf
- smoke
- air quality
- Marin City cut off dangerously by flooding
- Inundation of septic systems
- Can we access the whiteboard, or are comments just getting recorded through chat?
- Stop building in the WUI. Wildland fire is not a risk, building fires are a risk
- keep storm drain clear
- Provide more assistance to get people off wood burning home heating and migrated to electric-based heat.
- Drought is an endemic part of the historic climate of Marin. Use native plants that survive dry summers

- In Point Reyes because of the drought our water table is so low and sea water from the bay has increased the saline in the water to very unhealthy levels and we are having to get water from a delivery program,
- prescribed burns please
- study successful methods for building in flood planes..as we may need to do more of that to reach RHNA numbers
- To draw down greenhouse gases, reduce the number of cows (methane producers)
- As we consider more housing, take into account areas subject to sea level rise and avoid building in areas that are subject to increasing risk in coming decades.
- For more on GHG reduction and moving to electric see https://www.marincounty.org/depts/cd/divisions/sustainability
- Increase the use of e-bikes and other low impact electric vehicles to reduce traffic and exhaust fumes. Would require a significant capital investment and a challenge to the status-quo priority given to cars and trucks.
- Consider using some of the new infrastructure funds just signed into law to open the old train tunnels Woodacre to Fairfax and Corde Madera to Mill Valley. Provide a flat bike/pedestrian route from Point Reyes Station to Sausalito.
- Mitigate severe weather (wind) impacts by under grounding utilities
- SLR concern: dispersion of toxic chemicals in soil
- Government programs to help everyone convert to electric or hybrid vehicles.
- Will the housing element also be discussed tonight, or just the safety element?
- It is important to include in the housing element a program that prevent and mitigate the indirect impact of wildfires on residents, primarily regarding the air quality. For example, new housing design needs to include HVAC systems that can address that. Additionally, family child care providers, for example, have their businesses at their own homes. The indirect impact of the bad air quality during wildfire seasons affect their businesses and the healthy and safety of children and teachers. It is important that the program address this need.
- We will be discussing the housing element after our safety discussion
- Great, thanks!
- Additionally, heatwaves are becoming more common. Therefore, multi unit projects design guidelines should include air conditioning, for example.
- Some of the physically isolated populations are some of the wealthiest—beachfronts and mountains. They have the means to repair or move elsewhere.
- As an alternative to air conditioning, we could look at other means of controlling indoor temperatures using insulation, air flow and building orientation.
- With Marin City being in an high fire and now a flood zone. How will the county prepare people for the upcoming Climate changes?
- Consider providing air purifiers to clean indoor air to vulnerable populations. They do require electricity but far less that air conditioning.
- +1 Anne
- Is the zoning the same as the PSPS outage zoning?
- Think about providing floating housing that can also deter flooding...
- This looks like a great tool. I don’t see it in the demo, but will it also include Racially Concentrated Areas of Affluence, as defined by HCD?
- Hi Taiwana. There are several projects being planned in Marin City in the coming months. Two are County sponsored and one is an Army Corp project. We have staff that are coordinating now to ensure we are not being redundant, but providing the information and outreach to involve Marin City residents. Additionally, our Department of Public Works is planning a second engineering project to improve draining near the bay shoreline.

- Awesome. I haven't seen many other jurisdictions get down to making this fine level of data available to the public. Keep up the good work!
- Consider using some of the south facing slopes in Marin Open Space for substantial solar panel installations. It's a tough choice to sacrifice some of the open space, but what is the greater good… reducing dependence on carbon-based energy versus some sacrifice of the beauty and natural values in the open space? A careful assessment could be made to see if there might be an appropriate use of solar-generated electricity.
- Is there a map of suitable sites available for public review that the county has identified?
- English: https://www.surveymonkey.com/r/MarinCoHousingSurvey
- Español: https://www.surveymonkey.com/r/marincohousingencuesta
- Tiếng Việt: https://forms.gle/SzALWFaoxLMvFgge7
- Consider-it: https://marinsafetyelement.consider.it/
- In Western Marin, consider allowing backyard cottages to utilize electric or composting toilets and gray water systems that do not impact existing septic systems. Consider utilizing new innovations in modular construction, solar panels, air flow, insulation and space utilization to make comfortable housing that reduces cost and impact on utilities. Would require a re-visit to building codes and other ordinances, but perhaps it is time to take another look at these constraints.
- Re: possible homekey acquisitions, would those units count towards our RHNA goals?
- Can we provide public comment through email? If so, what is the best email address to direct our comments?
- Housing: housingelement@marincounty.org
- Safety: safetyelement@marincounty.org
- Has the county identified how many possible units of housing can be added as a result of SB 9 & 10?
- www.marincounty.org/housingsafetyelements
- https://www.marincounty.org/depts/cd/divisions/planning/housing-and-safety-elements
- Awesome. Sorry for all the questions, but how will the county be meeting AFFH requirements?
- Terner Center Study: https://ternercenter.berkeley.edu/wp-content/uploads/2021/07/SB-9-Brief-July-2021-Final.pdf
- Thanks!
- I would like to speak if I can
- How do plan to incentivize developers to build low truly affordable housing
- Does unincorporated Marin County have any affordable housing overlay zones? That might make it easier for developers
- How does wildfire risk/sea level rise factor into the identification of suitable sites, all the while keeping affirmatively furthering fair housing at the forefront of this work? Recognizing that the most exclusive communities are where there is the highest risk in our county
- Consider expanding the effort to identify sources of funding to fund community land trusts and the use of innovative modular construction methods to reduce construction costs.
- What two projects are happening in Marin City?
- The fact that Marin City has only one road that serve as the entrance and exit for residents should be considered a major obstacle to the construction of additional housing units there.
- https://www.marincounty.org/depts/cd/divisions/planning/housing-and-safety-elements

Marin County Housing & Safety Elements Community Workshop #3

Summary of Workshop Discussion

January 20, 2022

Introduction

In mid- 2021, the County of Marin began efforts to draft updates for the Housing and Safety Elements. State law requires the Housing Element be updated every 8 years. Through the Housing Element, the County must identify and plan for how the unincorporated County can accommodate at least 3569 units of housing, with a specific number of units for low and very low income, moderate income, and above moderate-income residents. State law also requires that the Safety Element be updated when the Housing Element is updated. The Safety Element is a plan that looks at geologic hazards, flooding, wildlands, and urban fires.

This was the third workshop held to engage the community in this project. The website, https://www.marincounty.org/depts/cd/divisions/planning/housing-and-safety-elements, contains more information about the project and its upcoming activities.

Workshop Purpose and Format

On Thursday, January 20, 2022, the County of Marin and its consultants, MIG and VTA, hosted a public workshop to inform the community about the planning process for updating the Housing and Safety Elements, collect input on the site selection process and introduce a digital tool that will receive input on specific sites. Following guidance from public health agencies regarding gatherings during the COVID-19 pandemic, the workshop was held virtually using online video conferencing. City staff conducted robust community outreach to publicize the event. This included social media posts on Facebook, NextDoor, and Twitter. In addition, the workshop was promoted through the County's email notifications from the website. Two hundred and nine (209) people registered for the event and one hundred and ten (110) people participated. The meeting was also live streamed to YouTube.

MIG planner Joan Chaplick served as the moderator and facilitated the meeting. Leelee Thomas, Marin County Planning Manager, provided remarks to set the context and introduced the County's project team. The workshop was highly interactive and included live polls, language interpretation in one other language, Spanish, small group discussions documented in real-time using a google sheet, and a live demonstration of a digital tool that will receive input on specific housing sites. Participants could submit comments and questions throughout the meeting using the "Chat" feature. The Project Team answered questions throughout the meeting.

Agenda Topics and Engagement Activities included:

- **Housing Element Process Update:** Participants received a brief update of the housing element's purpose and requirements. Participants were also asked to share a word in the chat that described Marin County and respond to six demographic questions.

- **Candidate Housing Site Selection Process:** The Project Team walked through the guiding principles, strategies, and scenarios used in the preliminary site selection process. Following the presentations, participants were randomly assigned to ten small groups. Each group had a facilitator and note-taker, nine groups were facilitated in English and the last group was facilitated in Spanish. The Spanish group was influx due to deficient Spanish-speaking participants. Participants were invited to share their priorities in scenarios for housing site selection, any issues and ideas regarding site selection, and questions for future housing site selection.
- **Balancing Act-Public Engagement Tool:** Participants received a brief introduction and demonstration of a tool called Balancing Act that will receive input on specific sites. The tool would be posted on to the website and would help users create their own housing plan out of the list of potential housing sites for the Housing Element.
- **Next Steps and Upcoming Outreach Opportunities:** Participants received a brief review and a preview of upcoming outreach opportunities including office hours for Balancing Act.

Results from the Engagement Activities

The workshop opened with an open-end question and six polling questions intended to collect basic information about the participants. For polling questions, a number "n" is provided for the number of respondents for the question. Not all participants responded to each question. This number is the basis of percentages shown unless otherwise described.

Question 1 - Provide one word you use to describe living in Marin County. *Participants were asked to test the chat by providing one word to describe living in Marin County. Open-end responses are in alphabetical order with the number of mentions noted in parenthesis.*

- Building
- Community killing
- Complicated
- Congested (2)
- Crisis (2)
- Critical
- Difficult (2)
- Expensive (7)
    - For seniors
- Very full
- Fluffy
- Hot
- Inaccessible
- Inadequate (2)
- Inequitable
- limited
- Old
- overpriced
- privileged
- Racist
- ridiculous
- Strawberry
- Strawberry
- Terra Linda
- Tight (2)
- Unfair
- Unsustainable

Question 2 - Where do you live? N:65

- 61.5% - Unincorporated Marin County
- 35.4% - City within Marin County (includes Belvedere, Corte Madera, Fairfax, Larkspur, Novato, Ross, San Anselmo, San Rafael, Sausalito, and Tiburon)
- 3.1% - I do not live in Marin County

Question 3 - For those who responded they live in unincorporated Marin County, please tell us what part of the county you live in. N:59

- 35.6% - Unincorporated Southern Marin (Tam Junction, Marin City, Strawberry)
- 23.7% - I do not live within unincorporated Marin County
- 15.3% - West Marin
- 13.6% - Unincorporated Novato (Black Point, Green Point, Atherton, Indian Valley)
- 10.2% - Unincorporated San Rafael (Marinwood, Santa Venetia, Los Ranchitos, Lucas Valley)
- 1.7% - Unincorporated Central Marin (Sleepy Hollow, Kentfield, Greenbrae, San Quentin Village)
- 0.0% - I don't know

Question 4 - Do you work in Marin County? N:72

- 54.2% - Yes
- 27.8% - I do not work (retired, unemployed, other)
- 18.1% - No

Question 5 - How long have you lived in Marin County? N:72

- 83.3% - 10 + years
- 2.8% - I do not live in Marin County
- 9.7% - 5-10 years
- 4.2% - 1-5 years
- 0.0% - Less than 1 year

Question 6 - What is your housing situation? N:73

- 82.2% - I own my home
- 11.0% - I rent my home
- 4.1% - I live with family/friends (I do not own nor rent)
- 2.7% - Do not currently have permanent housing

Question 7 - What is your age? N: 71

- 0.0% - Under 18
- 2.8% - 18-29
- 15.5% - 30-49
- 32.4% - 50-64
- 49.3% - 65+

Summary of Comments Received For The Housing Elements

Participants were encouraged to share their comments and ask questions using the chat feature. These responses are organized by favored scenarios, comments, and questions. This made for a very dynamic meeting and yielded valuable input for the project team. The following is a high-level summary of the key themes from the nine break-out groups that surfaced during the discussion. A full transcription of the breakout notes from each group is attached.

Scenarios

There were comments about having a balance of all the scenarios because all topics are important and should be implemented with respect to all stakeholders, residents and future residents.

1. Ensure Countywide Distribution

- Accessible transportation and transit
  - Encourage collocating housing with public transit stops and major corridors
  - Concerns with increased traffic due to increased population because of housing
  - Create walkable and bikeable communities
  - Does the unincorporated area include any SMART train stops?
  - Has anyone contacted Caltrans for an assessment of the maximum capacity of the roadway?
- Want more education around development and requirements
  - What is the budget for building in existing property?
  - How does SB 9 (Urban Lot split) fit into the housing planning?
  - Where do you apply for housing programs (ADUs, JADUs, etc.)? Responsibility for development falls on the homeowner.
  - Do developers decide the kind of housing that gets built (Low-income, moderate, workforce, etc.)?
  - Isn't the true measure of success is getting additional affordable housing built?
  - Are there any requirements for ADA or senior housing?
  - What are the characteristics and constraints of the potential sites?
  - Do current projects or those approved show up as numbers in Balancing Act?
  - What are the AMI income levels for each level of affordability as part of this process?
  - What is the relationship between approved housing in the Housing Element v. actual construction of housing?
  - What is the budget for building on an existing property?
  - Where do you apply for this program?
  - Is there a way to limit the development of above moderate housing prior to meeting certain construction metrics for affordable housing?
  - Who gets to decide what type of housing is developed? - i.e. moderate, workforce, etc.?

2. Address Racial Equity and Historic Patterns of Segregation

- Be creative and protect equitable opportunities
- Provide more affordable housing
  - Provide homeownership opportunities
  - Address concerns of corporate ownership of a unit
  - Consider non-profit and for-profit developers processes to ensure a diversity of housing types
  - Continue to fund/support different types of development
  - Provide various housing types

    - Cost for development is high, fees, land costs, etc.
    - Consider "gifting" land through easements to let adjoining owners to add ADUs
- Address segregation and make the county more equitable and diverse
    - Concern about existing restrictive covenants
    - Rezone areas that are historically segregated
- Create accessibly housing for mixed level of income, racial, cultural, and ages
    - Ensure housing is safe for both residents and the environment
    - Provide adequate resources
    - Distribute a diversity of housing and people throughout the county
- Other underserved groups
    - Provide accessible and affordable housing for the workforce, seniors, people with disabilities (ADA), and low-income families
    - Has there been consideration of children of current residents that feel pressure to leave because of costs? How can we alleviate the pressure?
    - Consider Social and human health

3. Encourage Infill and Redevelopment Opportunities

- Increase density and infill
    - Concern about the increase in the number of people
    - Consider San Geronimo, Inverness, Fire House on Frontage Road in Terra Linda, St. Vincent's, Silveira Ranch, Marinwood shopping centers, Golden Gate Village, and Sacred Heart Church in Olema as potential sites
    - Consider moving San Quentin prison and redeveloping
    - How do the unoccupied homes play into the process? (Vacation rentals & Airbnb, West Marin)
    - Consider rezoning (agricultural land), building code amendments, convert commercial buildings, and amending regulation for services (Waste, septic, stream, etc.) as a component of this process
    - Consider affordable housing in potential infill sites
    - Develop Tiny Homes, ADUs, JADUs, mixed-use, mobile home developments, boat communities, Habitat for Humanity development, etc.
    - Develop on undeveloped land, parking lots, public golf courses, and church property
    - Develop community land trusts
    - Has the county surveyed large landowners about the options under discussion?
- Infrastructure
    - Locate services with housing
    - Increase infrastructure (water, waste, power, sewage, parking, schools, hospitals, police, firefighters, etc.) demand due to increased population because of housing is a concern
    - How will the infrastructure be improved?
    - What efforts is the County making to update septic policies/regulations?
    - How will the improvements be paid for?

4. *Consider Environmental Hazards*
    - Protect the environment
        - Mitigate flooding, sea-level rise, air pollution, and wildlife
        - Ensure environmental justice communities/ underserved communities are safe from hazards
        - Preserve and protect open spaces
        - Create more accurate fire hazard maps
    - Concerned about evacuation route access
    - Concerned about developing around Tam Junction, Marin Mill Street, Marinwood Plaza, Drake, and St Vincent / Silveira

5. *Process Concerns and Ideas*
    - Feel the County will move forward with whatever decision without resident consent.
    - Think that the law is counterproductive; requiring a certain number of units whilst making construction more difficult and expensive, then the county will be reprimanded for not reaching the housing unit goal.
    - Consider resident retention and preserve the quality of life
    - What are the next steps in the process?
    - Will the tools and materials be in multiple languages?
    - How will the public be involved moving forward?

Next Steps

The City and MIG will share workshop results with the public and incorporate input into the development of the Marin County Housing Element. Participants were encouraged to share their responses to the survey on the website. The next workshop is scheduled for early spring.

Marin County Housing & Safety Elements Community Workshop #3

Summary of Workshop Discussion

March 29, 2022

Introduction

In mid- 2021, the County of Marin began efforts to draft updates for the Housing and Safety Elements. State law requires the Housing Element to be updated every 8 years. Through the Housing Element, the County must identify and plan for how the unincorporated County can accommodate at least 3,569 units of housing, with a specific number of units for low and very low income, moderate-income, and above moderate-income residents. State law also requires that the Safety Element be updated when the Housing Element is updated. The Safety Element is a plan that looks at geologic hazards, flooding, wildlands, and urban fires.

This was the fourth workshop held to engage the community. The website, https://www.marincounty.org/depts/cd/divisions/planning/housing-and-safety-elements, contains more information about the project and its upcoming activities. This workshop focused on the Housing Element.

Workshop Purpose and Format

On Tuesday, March 29, 2022, the County of Marin and its consultants, MIG and VTA, hosted a public workshop to inform the community about the planning process for updating the Housing Element. The focus of the meeting was to share information about potentials programs and policies for inclusion in the plan. The workshop was held virtually using online video conferencing. City staff conducted robust community outreach to publicize the event. This included social media posts on Facebook, NextDoor, and Twitter. In addition, the workshop was promoted through the County's email notifications from the website. One hundred and eighty-one (181) people registered for the event and one hundred and twelve (112) people participated.

MIG planner Joan Chaplick served as the moderator and facilitated the meeting. Leelee Thomas, Marin County Planning Manager, provided remarks to set the context and introduced the County's project team. The workshop was highly interactive and included Zoom polling, language interpretation in one other language, Spanish, Mentimeter polls, and real-time documentation on a digital whiteboard. Participants could submit comments and questions using the "Chat" feature throughout the meeting. The Project Team answered questions throughout the meeting.

Agenda Topics and Engagement Activities included:

- **Housing Element Process Update:** Participants received a brief update of the housing element's purpose and requirements. There was a presentation on the role and purpose of the Policies and Programs

- **Solicit Input on the Program Ideas and Priorities:** Participants received a presentation on potential policies and programs for the Housing Element. Throughout the presentation, participants were asked to share their ideas and comments in the chat and used the Mentimeter poll to rate potential policies or programs on a five-point scale, 1 being “No - Do not further develop” and 5 “Yes-Further develop this idea.”
- **Next Steps and Upcoming Outreach Opportunities:** Participants received a brief preview of upcoming events.

Results from the Engagement Activities

The workshop opened with an open-end question and five polling questions intended to collect basic information about the participants. For polling questions, a number “n” is provided for the number of respondents for the question. Not all participants responded to each question. This number is the basis of percentages shown unless otherwise described.

Question 1: Where do you live? N:60

- 0% - I do not live in Marin County
- 28% - City within Marin County (includes Belvedere, Corte Madera, Fairfax, Larkspur, Novato, Ross, San Anselmo, San Rafael, Sausalito, and Tiburon)
- 72% - Unincorporated Marin County

Question 2: For those who responded they live in unincorporated Marin County, please tell us what part of the county you live in. N:54

- 2% - Unincorporated Central Marin (Sleepy Hollow, Kentfield, Greenbrae, San Quentin Village)
- 2% - I don't know
- 4% - Unincorporated Novato (Black Point, Green Point, Atherton, Indian Valley)
- 9% - Unincorporated San Rafael (Marinwood, Santa Venetia, Los Ranchitos, Lucas Valley)
- 9% - Unincorporated Southern Marin (Tam Junction, Marin City, Strawberry)
- 13% - I do not live within unincorporated Marin County
- 61% - West Marin

Question 3: Do you work in Marin County? N: 67

- 9% - No
- 42% - I do not work (retired, unemployed, other)
- 49% - Yes

Question 4: How long have you lived in Marin County? N:69

- 0% - I do not live in Marin County
- 3% - Less than 1 year
- 4% - 5-10 years
- 6% - 1-5 years
- 87% - 10 + years

Question 5: What is your housing situation? N:72

- 0% - Do not currently have permanent housing
- 1% - I live with family/friends (I do not own nor rent)
- 18% - I rent my home
- 81% - I own my home

Question 6: What is your age? N:70

- 0% - Under 18 years old
- 3% - 18-29 years old
- 9% - 30-49 years old
- 34% - 50-64 years old
- 54% - 65+ years old

Summary of Comments Received for The Housing Elements

Participants were encouraged to share their comments and ask questions using the chat feature. These responses are organized by favored scenarios, comments, and questions. This made for a very dynamic meeting and yielded valuable input for the project team A full transcription of the breakout notes from each group is attached in the appendix.

Questions:

- What methodology was used to allocate the 14,210 units within Marin?
- With the population declining why are the numbers believed to be accurate and meaningful?
- Will the link for the recording be emailed to everyone who registered for the live event?
- How do low-cost rentals get figured in and included in affordable housing?
- Can employees of local businesses have preferences?

Summary of Input on the Program Ideas and Priorities

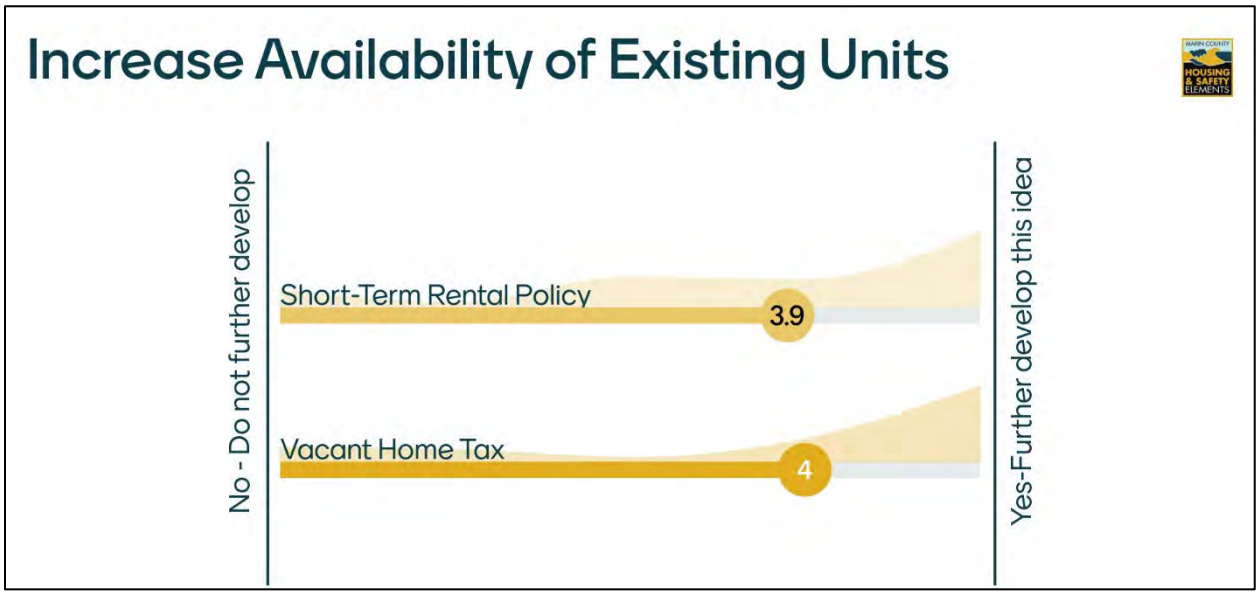
The workshop opened with a description of potential programs, an open chat period for comments and questions, and nineteen (19) scaling questions to rate whether the programs should or should not be further developed for the housing element. For Mentimeter polling questions, not all participants responded to each question; a number “n” is provided for the number of respondents for the question. The visuals represent the Weighted Average of the scaling questions. In the comments below, an asterisk (*) is used to indicate the number of times the comments were repeated.

A. Increase Availability of Existing Units

- Short term rentals
    - Units include VRBO, Air BnB, etc.
    - Many voiced the desire to eliminate and or limit the number of short-term rentals******
    - A comment stated that “Corporations/ Conglobates have purchased vast amounts of short-term rentals housing in West Marin. The county needs to enforce residential zoning.”
    - Question: Is the county looking at regulating STR, identifying abandoned houses to be salvaged as well as new housing?

- Vacant Home tax
    - Many voiced the desire to have a tax on vacant homes******
    - Case Study: Oakland has a vacancy tax for any empty homes. The city earned $7M last year. SF is considering it.
    - How is the vacancy tax enforced?
    - How do you know that a property is vacant? Penalizing people who can't live there all the time seems tricky.
    - Can employees of local businesses have preferences?
- Other Ideas:
    - Look at underutilized industrial and commercial spaces to adapt into residential or mixed-use housing.
    - Use government super fund to clean Brownfields.
    - Consider each program independently.
    - Make tiny homes/ remodeling kits
    - Concerns about traffic congestion, limited infrastructure, and resources.
    - Build along the 101, near transportation, and existing development.
    - Accessory Dwelling Unit (ADU): sometimes called a granny flat, junior accessory dwelling unit (JADU), or second unit.
        - Make it easier to create ADUs and JADUs*
        - Amnesty for legalizing existing units
        - Waive all fees
        - Incentive to come forward, bringing units to code
        - Guide people through the amnesty process
        - Need affordable rentals
        - See if we can add 500 or even more units without building a single home.

N: 63

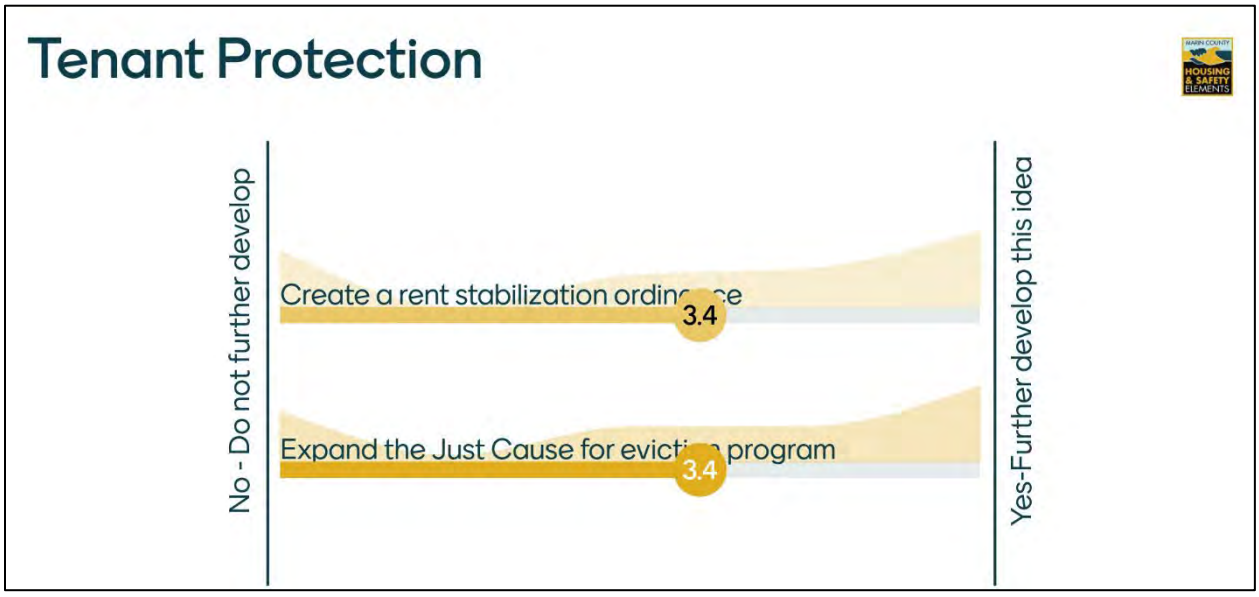


B. Tenant Protection

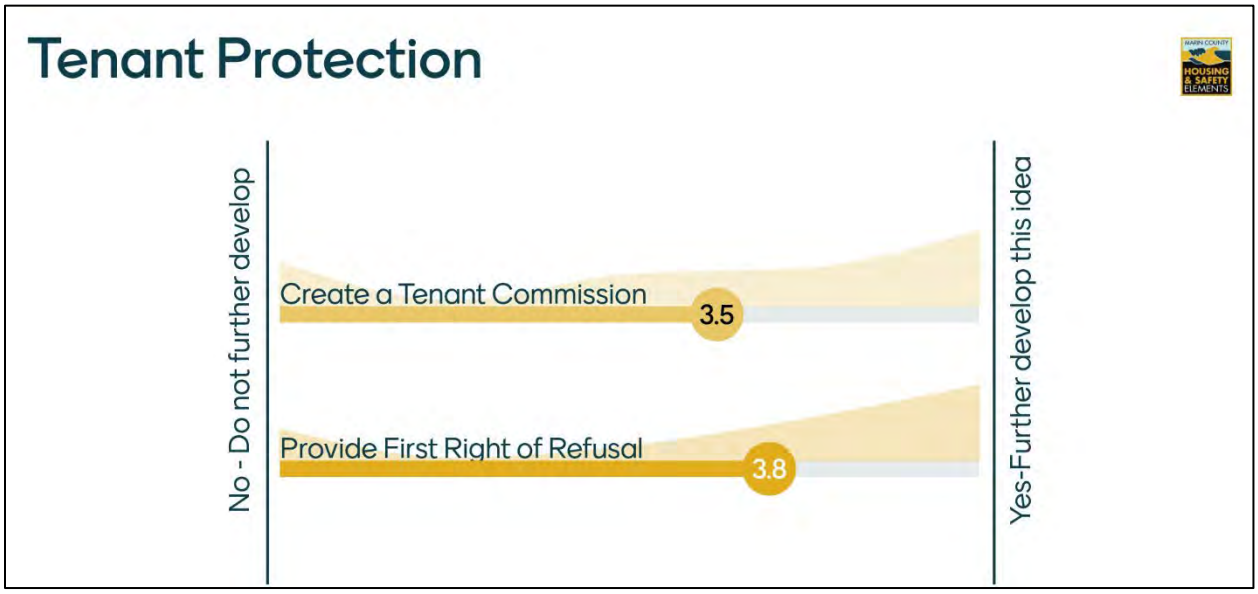
- Rent Stabilization Ordinance

    - No - Rent control ***
    - Yes - Rent control**
    - “Owner and tenant have to be protected. Tenants weaponizing rent control to extort owners or owners who abuse their tenants.”
- Expand the Just Cause for Eviction Program
    - Support Expand the Just Cause Ordinance*
    - “Provide longer notice periods when tenants are displaced when units are demolished. Allow tenants to return to rebuilt units at the rent they were paying when displaced.”
    - What does expanding the “just cause ordinance” mean?
    - How is it currently inadequate?
- Create a Tenant Commission
    - Why not a tenant-landlord commission? Discourage polarization?
    - Yes - Tenant commission **
        - It should be both tenant and landlord rights commission.
    - “Require landlords to be educated on their responsibilities as landlords so tenants are not taken advantage of.”

N: 64



N:68

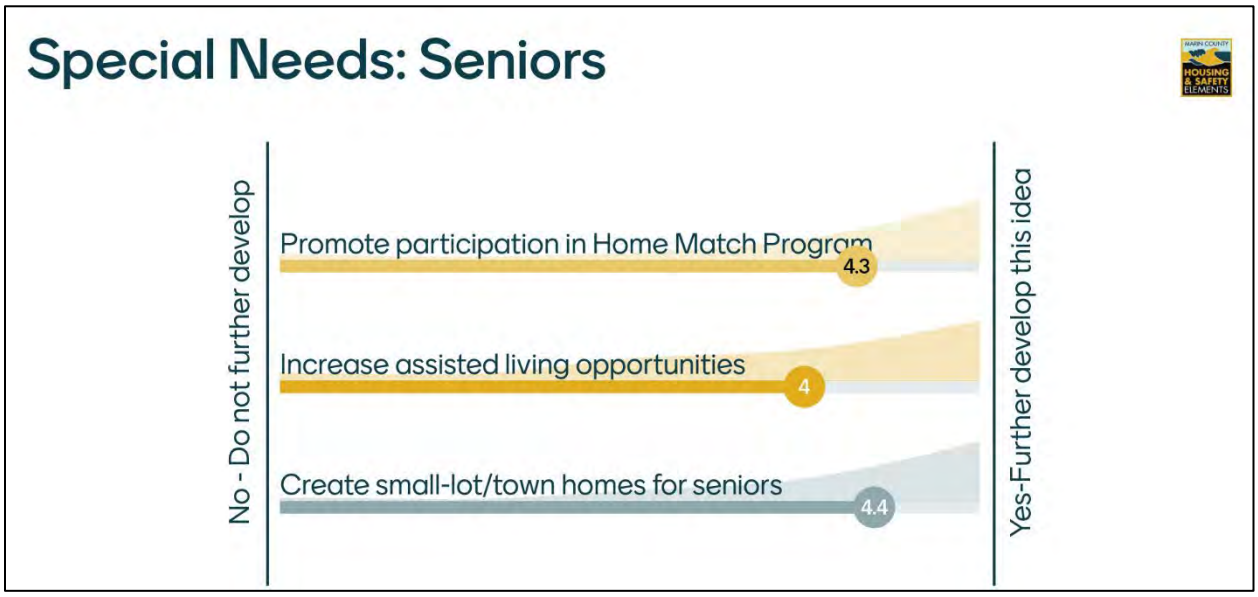


C. Special Needs Population – Seniors

- Promote participation in Home Match Program
  - Do the outreach through non-profits
  - Support the home match program
  - "I love the home match program. I know a young woman who lives in a home with a senior citizen. It was through Whistlestop."
- Increase assisted living opportunities
  - Support Senior housing subsidies for low income **
  - Support Seniors aging in place by modifying their homes
  - Support Senior communities
    - "Point Reyes and Mill Valley Redwoods have Successfully created lovely senior communities."
    - "Senior communities with activities for owners such as Robson in Texas or Arizona would be welcome."
  - Provide more Intergenerational Housing (shared/co-housing/co-living opportunities for senior and younger single adults)***
    - "Some seniors don't want to be around only other seniors, some like being in multigenerational communities."
- Create small lot/townhomes for seniors
  - Yes - Smaller lots *
    - Could small lots (1,200sf) with small homes for 800sf homes be available for purchase - similar to AB 803 starter home reg?
  - Yes - Tiny homes **
  - Fund specific programs using state grant funding.
  - Support caregiver cottages/ housing **
  - Create more senior housing and tiny homes***
    - For purchase and or renting

- In West Marin
- ADUs on family members' property
    - Are there subsidies for ADUs?
- Difficult with septic systems in West Marin
- Build single-level housing and provide elevators for seniors.
- "Could regulations similar to SB 9 provide for lots splits so seniors can provide another family space for a home but not have to take on the debt from building a second unit."
- "Could a low-cost loan, streamlined permitting and pre-approved plans for ADUs be made available for seniors?"

N: 69



C. Special Needs Population - Farm Workers

- Develop a program for County to work with farm employers to contribute to an affordable housing fund or land trust***
    - Talk with the employer, farmworkers, and their families regarding needs **
    - Consider the duration of the stay and employment
    - Can we allow non-profits to manage the units so that there is decent and safe housing and provide AFFH?
    - How would you police that the farmworker housing is farmworkers?
    - "Dairy farms supply free housing for employees and their families. Need to help upgrade housing on farms"
    - Explore opportunities for renters to purchase with funding for land trusts, co-ops, to purchase and preference for "essential workers"
- Develop a set aside of percentage units at new affordable housing developments for farmworkers*
    - Are these seasonal workers?
    - Short-term rental?

- Other
    - Change 60-acre zoning
    - Commute Less
    - House caregivers and health support workers
    - Expedited review is important
    - Amend the Williamson act to create housing for non-farmworkers
    - “Farmworkers are the most essential workers”
    - Create a village out of groups of farmworker housing

N:62

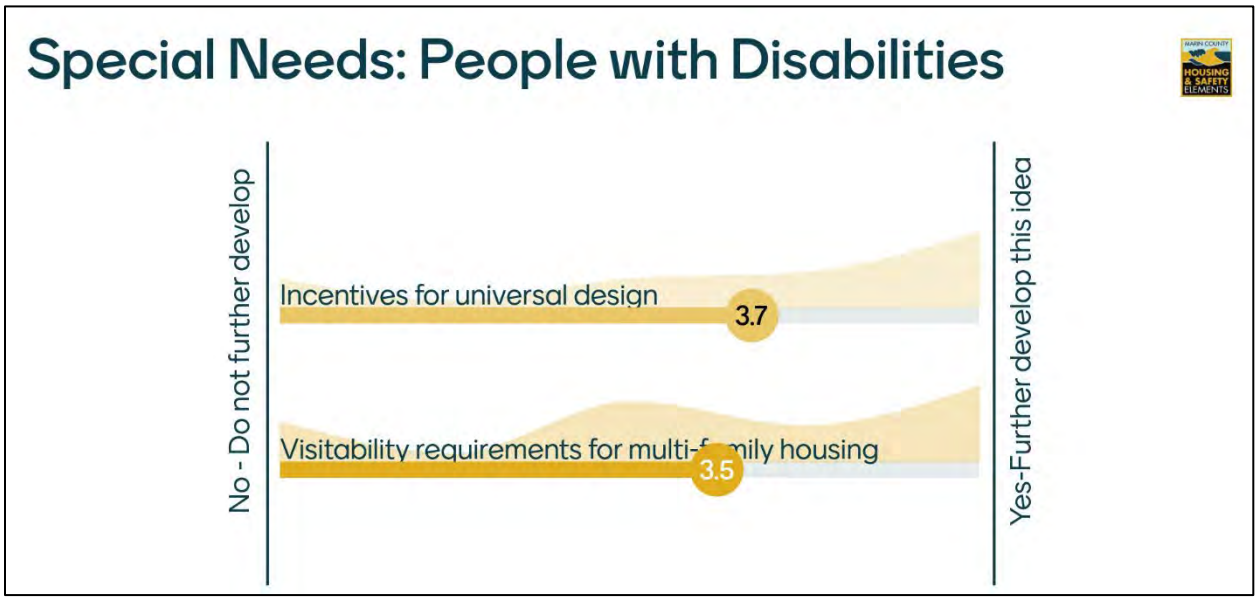
C. Special Needs Population - People with Disabilities

- Assistance with accessibility improvements
    - Aging people may be temporarily disabled.
    - Old buildings are problematic.
    - What about housing for people with developmental disabilities?
    - Are there plans for independent and supported living options?
- Expedited review for reasonable accommodation
    - Is there a deadline to decide?
- Incentives for universal design
    - ADA is a necessary regulation but can be weaponized.
    - All new construction has to be built with ADA and accessibility regulations.
    - Single-story housing units are both rentals and for purchase.
    - Regulations would be difficult to legalize many ADUs.
- Visitability requirements for multi-family housing
    - could you further define multi-family?
    - How many occupants or units?
    - Multifamily is governed by ADA and Universal Design Guidelines.

- Unsure it's a good idea to push multi-family housing in rural areas

N:56

N:57



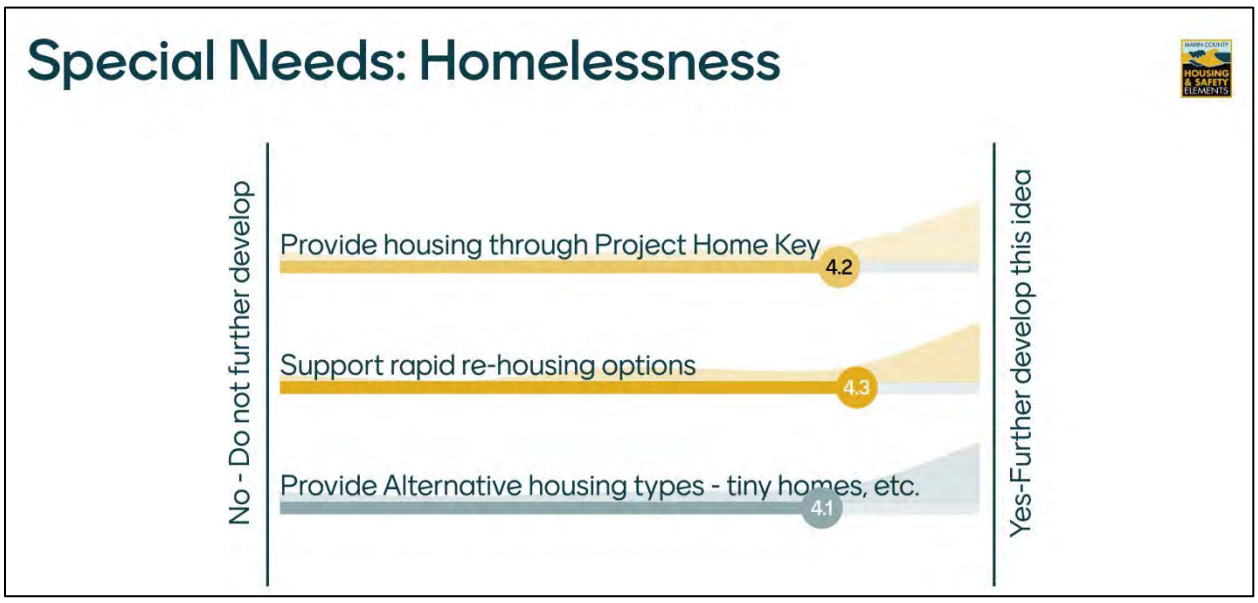
C. Special Needs Population - Persons Experiencing Homelessness

- Provide housing through Project Home Key
    - How does the county plan on preventing Project HomeKey from being turned down by the neighborhoods they're found in?
    - Use Lee Garner Park in Novato as a model for transition housing
- Support rapid re-housing options
    - Help alternative-housed individuals remain in their communities

- Make the permits temporary
- Need partnership support

- Provide Alternative housing types - tiny homes, etc.
  - Job trading and work placement program.
  - Offered permanent housing for people in hospitals
  - Can tiny homes be allowed in campgrounds or backyards?
  - Do not overpopulate and create health hazards in tent cities
  - Ask Homeless questions
  - Decriminalize “compostable toilets.”
  - Treatment and substance abuse services (Mental & Health) as an adjunct to housing are essential***
  - Considerations for resources (water, sustainability, and drainage)

N: 59



D. Other Program Ideas & Comments

- Affordable housing
  - Incentives for ADU production for Low-income populations?
  - Low-cost lending pool to produce units for low-income homeowners
  - Shallow rent subsidies for low-income residents
  - “Can the county increase the percentage of required affordable housing for projects?”
- Environmental concerns
  - Allow for a prescriptive septic design for set geographic areas to save money
  - Allows for shared septic systems for permanently deed-restricted unit development
  - Change flows to be reflective of 65g per day per bedroom now that we have low flow fixtures.
  - “How will traffic concerns be addressed given the risk of fire?”
  - Concerns with additional air pollution from added housing

- Homeless
    - Join housing and social services
- Infill
    - “How about infill housing over shopping centers that are already in transportation hubs?”
    - “Facilitate communities building septic systems to allow for infill”
    - “Need small sewer or package plants for infill projects instead of septic”
    - Keep West Marin Rural – tourism and recreation
- Local Preference
    - Clarify why Marin is not submitting local preferences
- Small Lots/Tiny homes
    - “Can the county buy some lots and put tiny homes on these?”
    - Build a sense of community using community bathrooms, and kitchens could in Tiny Home and Tent communities.
    - Legalize Tiny Houses countywide
- Streamlining
    - “Can by-right or streamlined permitting and increased density for all affordable projects be considered?”
    - Offer project management and approved ADU building plans
    - Support self-help housing so families can build their own homes using set plans and streamlined permit process
    - Streamline development applications should be applied to all forms of residential housing.
    - “Is there a county of how many ADUs are in code enforcement at this time?”
    - Potential “transaction tax on home sales to provide County funds for additional affordable housing?”
    - “County should take a more active role in creating flexibility in building housing.”
    - Need a flexible/ affordable housing market.
- Vacant home and short-term rentals
    - Stop/limit 2nd and 3rd homes, single homes, apartments, etc. rentals.
    - Raises the cost and left vacant
    - Does the county have a count on the number of abandoned houses?
    - Levy a tax on rentals and funding goes to housing ideas
- Other
    - Programs to transition people into different housing types --> meet housing needs throughout steps in life
    - How are things allocated? Fire risks, evacuation concerns, infrastructure, congestion, etc.
    - “County's role in financing?”

Next Steps

County staff will make a presentation on the Housing Element Proposed Policies and Programs at a Joint Session of the Board of Supervisors and the Planning Commission on April 12. The draft Housing Element will be available for public review during Summer 2022.

Marin Housing & Safety Element Workshop
April 4, 2021 - 6pm-8pm

What's one word that comes to mind when you think about safety and Marin County.

Good	Unprepared	Fire exposure/ Risk ✔✔✔✔	Water	Climate Change/ Crisis ✔✔	Delusional
Clogged roads	Quiet	Evacuation ✔✔	Traffic	Drought ✔✔	

Safety Element

- Explain the relationship b/w the Safety Element and the Housing Element.
- Do the safety issues need to be resolved before the housing element occurs?

Goals & Programs

Equity

- Residents (Homeowners, etc.) were included in some focus groups

Wildfire

- Unhealthy air is made worse with wood burning stoves used for home heating. ✔
- Ban wood burning stoves
- A robust program to help residents convert to heat pumps
- No one should be "left in the cold"
- No one should be breathing the wood smoke.
- Time to expand and mandate updating heating systems
- Do you include tourist traffic in evacuation route planning?
- How will wildfire safety be applied to proposed housing in the Atherton Corridor?

Disaster Preparedness, Response & Recovery

- What infrastructure is possible given fire risk?
- Traffic is already Congested
- Evacuation routes are important
- A plan to staff intersections and override the stop lights is important
- Stop lights & signs would quickly back up traffic for miles.
- Out pouring of cars would require alternate routes

Resiliency Planning

- Limit building to affordable housing only in West Marin? All at risk of wildfire
- How does EV infrastructure fit in disaster and resiliency planning?
- Who gets the building contracts?
- West Marin developers should agree to strict environmental considerations
- Environmental concerns need to be a component of any plans for new housing

Sea Level Rise

- Have they heard about Measure C- MWPA, all that is happening re. sea level rise
- Do people know what the real risks are and what is actually being done?

Severe Weather, Extreme Heat & Drought

- Are there any plans to remove vegetation that can fuel fires?
- Are there plans for allowing composting or incinerating toilets given drought and the climate crisis? ✔
- Live in a West Marin community that depends on groundwater wells for domestic water. Worsening drought is a real concern.
- How can new housing be approved here without knowing added impact to the groundwater supply in drought conditions?

What's the best way to get you information about emergency conditions?

- Text ✔✔✔
- Nixle
- Voice mail on landlines, in case the cell towers are down.
- Email

Additional Issues, Concerns, Questions?

- Community meeting notification in Novato?
- When and how were citizens informed about the resources and directed how to sign up?
- We need Affordable housing- what is the deadline to put in the proposal before state takes jurisdiction of this issue?
- Better publicity & notifications of this process sent out.

Public Comments

- What is the county going to do next? Homes are going at market rate but very expensive
- Collaborate with incorporated cities and towns
- Work closely with the Mwpa, and with ecologically sound practices
- What is the timeline?
- If there is going to have more housing therefore more people which is a bigger risk.
- Communicate with the cities since they are going through similar process'
- Make sure that all the efforts being made for fire prevention and safety taken into account
- About what the affordable housing is going to planned
- Are we going to be able to do this affordably and safely
- And they have to adhere to county rules as well
- How does environmental interests and ecological concerns fit?

Sites Road Shows Links

https://www.marincounty.org/depts/cd/divisions/planning/housing-and-safety-elements/meetings

Housing Element Sites - Community Updates (January 26, 2022 - February 17, 2022)

- English: Presentation | Español: Presentación
- Kentfield (Design Review Board meeting): 01/26/22 - meeting minutes will be posted soon
- Tamalpais Valley (Design Review Board meeting): 02/02/22 - meeting minutes will be posted soon
- Strawberry (Design Review Board meeting): 02/07/22 - meeting minutes will be posted soon
- Unincorporated Ross Valley: 02/09/22| Video[External]
- Lucas Valley/Marinwood: 02/10/22 | Video[External]
- Santa Venetia/Los Ranchitos*: 02/15/22 | Video[External]
- Marin City* (Community Conversations meeting): 02/15/22 | Video[External]
- West Marin*: 02/16/22 | Video[External], Follow-up questions and answers[PDF], Preguntas y respuestas de seguimiento[PDF]
- Unincorporated Novato*: 02/17/ 22 | Video[External], Follow-up questions and answers, Preguntas y respuestas de seguimiento[PDF]
- San Geronimo Valley: 03/09/22 | Video[External], Follow-up questions and answers

Marin HE-SE Focus Groups
Top Level Findings

September 9th, 2021

Homeowners

- Living about 10-20 years in the current housing
- Found housing through real estate agents
- Somewhat satisfied - would like more options, the climate is changing
- Affordability is an issue, moving in fees, has to make multiple offers
- Limited access to public transit in Marin County
    - Reverse commute from SF is still bad, super commuters from outside Bay Area
- Would not move or be able to buy again in Marin now
- COVID: working from home more now, internet access/call reception (spotty)
- Feeling “stuck” in current home, unable to consider buying something else right now
    - Decided to invest in renovations since they feel unable to move/purchase something else
- Maintenance: poor street infrastructure, clogged water pipes causing flood issues
    - Whose responsibility is it for tree maintenance: HOA vs County?
- Wildfire and flooding are constant fears, house would not survive (older houses)
- No AC in older homes / single-family homes, homes get hot inside after 80 degrees
- Power outages - issue for boat homes
- Air Quality: residents are adapting, closing windows, getting air filters
    - Not getting notified, had to find information daily through apps/weather channels
    - Using masks, but hard to access/find, health concerns
- Insurance has gone up / concerns about this
- Programs from County - few were aware
- Suggestions for getting information to residents
    - Mailers, working with local businesses, emails, nextdoor, neighborhood associations (formal/informal), schools
- Suggestions for making housing more affordable
    - Transparency on purchasers (concerns of LLCs / Foreign buyers/speculators)
    - Limiting short-term rentals (AirBnB, etc)
    - Removing barriers to building in-law units (limited city/county staff to help with these processes - San Rafael as an example)
    - Increase property taxes on higher (millions) income homeowners/residents
    - Lower / subsidence property taxes for lower-income residents

Renters

- Wide range of length of time living in Marin (6 months - 50 yrs)
- Not able to buy a home / afford to buy a house
- Limited space (studios / small units / in-law units) - limit family growth
- Found housing through Craigslist and online searches and referrals

- Long-term renters had moved a lot around the County
- Barriers: affordability, strange rules, and added requirements from landlords (not feeling comfortable being home all day, not being able to have guests)
    - Most of their paycheck goes to housing, transportation, utilities, and not much left
    - Discrimination based on race/ethnicity by landlords
    - Limited transportation
    - Would rather live in East Bay (would feel more comfortable there)
- Some POC expressed they feel unwelcome or watched when they go shopping- prefer the East Bay where they people more welcome
- Improving housing:
    - Moving expenses are high
    - People would leave Marin County
    - Lose medical support system (resident on disability)
- Isolation, feeling secluded
- Residents don't know where to access programs
- Suggestions for getting information
    - Billboards, community boards, flyers
    - Seniors centers
    - Grocery stores
    - Schools
    - Craigslist, Next Door
- Suggestions for affordable housing
    - Developing co-op
    - Repurposing public spaces: church parking lots, other vacant spaces
    - Increase taxes on the rich
- COVID: feeling a lot more isolation, disconnected from community
- Air Quality: smoke impacting health concerns
    - Not getting notified - using apps, Google
    - Using masks, staying indoors (exercise, not walking dog)
    - Changing air filters, air purifiers
    - Impacting mental health/isolation
- Extreme heat events
    - Want cooling centers
    - Don't have a central cooling system in units
- Neighborhoods not organized, don't know their neighbors
    - Not much coordination or alarms for emergencies
- Limited cell reception, especially in case of emergencies

Similar Themes (Renters + Homeowners)

- Lack of affordability (rents, buying homes, living expenses in general)
- Lack of resources / information: not knowing who to go to for access, or where to get information
- A general feeling of dissatisfaction / just dealing with what they have / settle for what they can afford

- Residents would have to leave Marin if they have to move from current housing or in event of natural disaster, can't afford to rebuild/stay/find a new place within Marin
- Most neighborhoods are not coordinated or organized in case of natural disasters

CBO

- To some degree, they all work with Low-income residents; People of Color; Families with children; Adults and youth with special needs; Seniors; Other groups
- Finding housing
    - Long waitlists (up to 200 households)
    - Word of mouth/referrals are used
- Length of a search varies, case by case (could be a few weeks to a couple of months)
- CBOs providing support
    - Security deposits
    - Working with landlords
- Barriers
    - Lack of affordability
    - Undocumented residents have a had time securing housing
    - Substandard/unsafe housing
    - Lack of public transportation
    - Landlords trying to evict people, not keeping homes up to codes/repair needs
    - Challenges for sub-leaders
    - Farmworker housing is tied to work/employment
    - Homeowners often do not qualify for “low-income” programs/services
    - Changing housing is a challenge
    - Many workers are commuting from other counties, including CBO staff and clients
    - Limited housing stock: due to short term rentals and secondary homes
    - Other issues: waste systems, education for homeownership, renters rights
- Obstacles due to Covid
    - Rise in domestic violence / sexual violence
    - Poor performance in school (online)
- Opposition for affordable housing projects
    - Lack of sites for new housing
    - Concerns that increase diversity would make drought challenges worst
- Discrimination:
    - Against undocumented people
    - General unwelcomeness
    - NYMBYism
    - Racist / discriminatory comments/ covenants
    - Against disabilities (design of the housing is not helpful)
    - Seniors are unable to downsize because of limited affordable options
    - Need to have better relationships with landlords
        - Landlords discriminate against housing vouchers
        - Concerns about new residents disrupting the neighborhood

- County programs Support awareness
    - ADU/JADU programs are good, need to be expanded
    - Need inclusionary housing
    - People don't know they qualify for certain services
    - Zoning for camp groups
- Challenges to adding ADUs
    - Cost of construction/permits, staying up to code
    - Property taxes- tax relief if you have affordable rentals (incentives to rent affordable units, maybe have lower property taxes)
    - Land use policy limiting Increase density
    - Design/ infrastructure considerations for seniors (Ex: ramps, counter height)
    - ADUs being used for short term rentals
- Suggestions for making it easier to get information
    - Increase case management at CBO level (would like funding to support this)
    - Cultural considerations of staff supporting clients - Vietnamese communities, Spanish speaking communities,
    - Go where the people are
    - Closing digital divide: using WhatsUp and text to get information out
    - Increase staff to assist with application to services
    - Education awareness to people/public on ways they could retain their homes and stay in Marin
- Suggestions for making it more affordable
    - Universal basic income
    - One-stop shop to find resources (Events, public health information, etc.)
    - Intergenerational housing
    - Pathways to affordable homeownership with a racial equity lens, addressing decades of unequal access/racism
    - Innovative housing - Innovative ways to build things, 3D printed little homes / little neighborhoods, set a new image of what is acceptable housing
    - Fair Chance ordinance
- Safety/ Disaster Preparedness
    - Flooding and fire hazards
    - Bridge closures, earthquakes
    - Displacement due to natural disasters (people would not be able to stay in Marin)
    - Unable to afford hotels for evacuations / unable to stay in friends' home (limited space)
    - Generally unprepared and don't know who to ask for help
    - Can't afford AC, limited transportation to cooling centers
    - Seniors unable to care for themselves, more health risks, more isolation
        - Aging in place is difficult, people lose their support systems
    - Support
        - Grassroots project by and for low-income residents created emergency Go Buckets (75 buckets with supplies, masks, etc)
        - Organizations Directly working with communities

Community Survey – Housing Needs in Unincorporated Marin County

Marin County is in the process of preparing a housing plan, called the Housing Element, to address housing needs for people living in the County's unincorporated areas (not within the cities or towns). This survey is designed to have you share your ideas about housing needs today and in the future.

Your input will inform the Housing Element. The survey will take about 10 minutes to complete.

Please tell us about your current housing circumstances.

1. What is your housing situation?

- ◯ I rent my home
- ◯ I own my home
- ◯ I live with family/friends, do not own or pay rent
- ◯ Do not currently have permanent housing

2. Where do you live? (Find where you live http://gis.marinpublic.com/lookup/JurisdictionLookup/)

- ◯ Unincorporated Marin County
- ◯ A city within Marin County (Corte Madera, Larkspur, Mill Valley, Ross, Sausalito, Tiburon, Novato. San Anselmo, San Rafael)
- ◯ I do not live in Marin County

3. If you responded that you live in Marin County, please tell us exactly where. (Select one)

- ◯ **West Marin**
  - ◯ Northern Coastal West Marin (Dillon, Tomales, Marshall)
  - ◯ Central Coastal West Marin (Inverness, Point Reyes Station, Olema)
  - ◯ Southern Coastal West Marin (Bolinas, Stinson, Muir)
  - ◯ Valley (San Geronimo, Woodacre, Lagunitas, Nicasio, Forest Knolls)
- ◯ **Unincorporated San Rafael**
  - ◯ Santa Venetia
  - ◯ Los Ranchitos
  - ◯ Other part of Unincorporated San Rafael
- ◯ **Unincorporated Novato**
- ◯ **Marinwood/Lucas Valley**
- ◯ **Unincorporated Southern Marin**
  - ◯ Marin City
  - ◯ Strawberry
  - ◯ Tam Valley/Almonte/Homestead
  - ◯ Other part of Unincorporated Southern Marin
- ◯ **Unincorporated Central Marin**
  - ◯ Kentfield/Greenbrae
  - ◯ Sleepy Hollow
  - ◯ Other part of unincorporated Central Marin
- ◯ **I do not live in unincorporated Marin County**

4. Do you work in Marin County?

- ◯ Yes
- ◯ No
- ◯ I do not work (retired, unemployed, unable to work, or other)

5. How long have you lived in Marin County (city and unincorporated)?

- ◯ Less than 1 year
- ◯ 1-5 years
- ◯ 5-10 years
- ◯ 10 + years
- ◯ I do not live in Marin County

6. What is your age?

- ◯ Under 18
- ◯ 18-29
- ◯ 30-49
- ◯ 50-64
- ◯ 65 or older

7. What is your race/ethnicity?

- ◯ White / Caucasian
- ◯ Asian / Asian American
- ◯ Black / African Ancestry
- ◯ Hispanic / Latino
- ◯ Pacific Islander
- ◯ Native American, or Indigenous
- ◯ Two or more races
- ◯ I prefer not to say
- ◯ I prefer to self-identify: _____

8. What percentage of your income is spent on housing costs (including rent and utilities or mortgage, property tax, and homeowner's insurance)?

- ◯ Less than 30% of income
- ◯ Between 30-50% of income
- ◯ More than 50% of income
- ◯ Does not apply

9. How well does your current housing meet your needs?

- ◯ I am satisfied with my housing
- ◯ I would like to downsize but am unable to find a smaller unit
- ◯ I am unable to house additional family members
- ◯ My unit is substandard or in bad condition and I need my landlord to respond
- ◯ My unit is in bad condition, and I cannot afford to make needed repairs
- ◯ My unit needs improvements to make it easier to live with a disability
- ◯ None of the above

10. Select the top 3 housing priorities for unincorporated Marin County:

- ◯ Increase the amount of housing that is affordable to moderate, low, and very low- income residents
- ◯ Make it easier to build new housing in unincorporated Marin County
- ◯ Create programs to help existing homeowners stay in their homes
- ◯ Target efforts to address inequities in the housing market, including discrimination in renting
- ◯ Increase homeownership opportunities for moderate, low- and very-low-income residents
- ◯ Improve substandard housing conditions
- ◯ Other: _____

11. There is insufficient housing in my community for (please select all that apply):

- ◯ Families with children
- ◯ Low-income households
- ◯ Older adults (Seniors, Elderly)
- ◯ Single individuals
- ◯ Persons with disabilities
- ◯ I don't know
- ◯ Other: _____

12. Please identify any barriers to affordable housing:

- ◯ Lack of resources to help find affordable housing
- ◯ Limited availability of affordable units
- ◯ Long waitlists
- ◯ Quality of affordable housing does not meet my standards
- ◯ Other: _____

13. Please share any other comments you have related to housing in Marin County:

_____

_____

_____

_____

MARIN COUNTY
HOUSING & SAFETY ELEMENTS

Thank you for your input. For more information and to stay informed, please visit:

MarinCounty.org/HousingSafetyElements

Encuesta comunitaria – Necesidades de vivienda en el Condado de Marín, áreas no incorporadas

El Condado de Marín está preparando un plan de vivienda, llamado Elemento de Vivienda, para abordar las necesidades de vivienda de las personas que viven en áreas no incorporadas del Condado (fuera de las ciudades o pueblos). Esta encuesta está diseñada para que comparta sus ideas sobre las necesidades de vivienda hoy y en el futuro.

Su aportación ayudará a la creación del Plan de Vivienda del Condado. La encuesta tardará unos 10 minutos en completarse.

Cuéntenos sobre sus circunstancias actuales de vivienda.

1. ¿Cuál es su situación de vivienda?

- ◯ Alquilo mi casa
- ◯ Soy dueño de mi casa
- ◯ Vivo con familiares / amigos, no soy dueño ni pago alquiler
- ◯ Actualmente no tengo un hogar permanente

2. ¿Dónde vive? (Encuentre dónde vive aquí: http://gis.marinpublic.com/lookup/JurisdictionLookup/)

- ◯ Área no incorporada en el Condado de Marín
- ◯ Una ciudad dentro del Condado de Marín - Corte Madera, Larkspur, Mill Valley, Ross, Sausalito, Tiburón, Novato, San Anselmo, San Rafael
- ◯ No vivo en el Condado de Marín

3. Si respondió que vive en el Condado de Marín, díganos exactamente dónde vive. (Seleccione una opción)

- ◯ **Oeste de Marin**
  - ◯ Costa Norte del Oeste de Marín (Dillon, Tómales, Marshall)
  - ◯ Costa Central del Oeste de Marin (Inverness, Point Reyes Station, Olema)
  - ◯ Costa Sur del Oeste de Marín (Bolinas, Stinson, Muir)
  - ◯ Valle (San Gerónimo, Woodacre, Lagunitas, Nicasio, Forest Knolls)
- ◯ **Áreas no incorporadas de San Rafael**
  - ◯ Santa Venecia
  - ◯ Los Ranchitos
  - ◯ Otras áreas no incorporadas de San Rafael
- ◯ **Áreas no incorporadas de Novato**
- ◯ **Marinwood / Lucas Valley**
- ◯ **Áreas no incorporadas del Sur de Marin**
  - ◯ Marín City / Ciudad de Marin
  - ◯ Strawberry
  - ◯ Tam Valley / Almonte / Homestead
  - ◯ Otras áreas no incorporadas del Sur de Marín
- ◯ **Áreas no incorporadas del Centro de Marín**
  - ◯ Kentfield / Greenbrae
  - ◯ Sleepy Hollow
  - ◯ Otras áreas no incorporadas del Centro de Marín
- ◯ **No vivo en áreas no incorporadas del Condado de Marín**

4. ¿Trabaja en el Condado de Marín?

- ◯ Si
- ◯ No, trabajo fuera de Marin
- ◯ No trabajo (estoy jubilado, desempleado, incapacitado para trabajar, u otra razón)

5. ¿Cuánto tiempo ha vivido en el Condado de Marín (ciudad y no incorporado)?

- ◯ Menos de 1 año
- ◯ 1-5 años
- ◯ 5-10 años
- ◯ 10 años o mas
- ◯ No vivo en el Condado de Marín

6. ¿Qué edad tiene?

- ◯ 17 años o menos
- ◯ 18-29
- ◯ 30-49
- ◯ 50-64
- ◯ 65 años o más

7. ¿Con qué raza o etnia se identifica? (Elija todo lo que corresponda)

- ◯ Caucásico / Blanco
- ◯ Asiático / Asiático Americano
- ◯ Afroamericano
- ◯ Hispano / Latino
- ◯ Isleño del Pacífico
- ◯ Nativo Americano o Indígena
- ◯ Dos o más raza o etnias
- ◯ Prefiero no decir
- ◯ Prefiero identificarme a mí mismo: _____

8. ¿Qué porcentaje de sus ingresos se gasta en costos de vivienda (incluidos el alquiler y los servicios públicos, o la hipoteca, el impuesto a la propiedad y el seguro de vivienda)?

- ◯ Menos del 30% de mis ingresos
- ◯ Entre el 30-50% de mis ingresos
- ◯ Más del 50% de mis ingresos
- ◯ No me aplica

9. ¿Qué tan bien satisface sus necesidades su vivienda actual?

- ◯ Estoy satisfecho con mi vivienda.
- ◯ Me gustaría reducir el tamaño, pero no puedo encontrar una unidad más pequeña.
- ◯ No puedo alojar mi hogar a miembros adicionales de la familia.
- ◯ Mi unidad es deficiente o está en malas condiciones y necesito que mi arrendador responda.
- ◯ Mi unidad está en malas condiciones y no tengo el presupuesto para hacer las reparaciones necesarias.
- ◯ Mi unidad necesita mejoras para que sea más fácil vivir con una discapacidad.
- ◯ Ninguna de las anteriores

10. Seleccione las 3 principales prioridades de vivienda para las áreas no incorporadas del Condado de Marín:

- ◯ Aumentar la cantidad de viviendas asequibles para residentes de ingresos moderados, bajos y muy bajos.
- ◯ Facilitar la construcción de nuevas viviendas en las áreas no incorporadas del Condado de Marín.
- ◯ Crear programas para ayudar a los propietarios existentes a permanecer en sus hogares.
- ◯ Dirigir los esfuerzos para abordar las desigualdades en el mercado de la vivienda, incluida la discriminación en el alquiler.
- ◯ Aumentar las oportunidades para convertirse en propietario de vivienda para los residentes de ingresos moderados, bajos y muy bajos.
- ◯ Mejorar las condiciones de vivienda deficientes.

11. No hay viviendas suficientes en mi comunidad para (seleccione todas las opciones que correspondan):

- ◯ Familias con niños
- ◯ Residentes de bajos ingresos
- ◯ Adultos mayores (Mayores, Ancianos)
- ◯ Individuos solteros o viviendo solos
- ◯ Personas con discapacidad
- ◯ No sé
- ◯ Otro: _____

12. Por favor identifique cualquier barrera a la vivienda asequible:

- ◯ Falta de recursos para ayudar a encontrar viviendas asequibles
- ◯ Disponibilidad limitada de unidades asequibles
- ◯ Listas de espera largas
- ◯ La calidad de la vivienda asequible no cumple con mis estándares
- ◯ Otro: _____

13. Comparta cualquier otro comentario que tenga relacionado con la vivienda en el condado de Marín.

_____

_____

_____

_____

MARIN COUNTY
HOUSING & SAFETY ELEMENTS

Gracias por su aporte. Para más información y para mantenerse informado por favor visite:

MarinCounty.org/HousingSafetyElements

Marin Housing Element: Housing Survey Results Summary

Prepared by:

800 Hearst Avenue
Berkeley, CA 94710

January 2022

Introduction

The County of Marin is updating their Housing Element, as required by law, to establish the conditions for more housing at all income levels to be developed across the unincorporated areas of the county with the goal of meeting the RHNA number assigned to Marin County by the state of 3,569 units.

The County has provided multiple opportunities for resident to weigh in on the update process for the Housing Element. The survey described in this summary was just one of the ways residents were able to share their experiences and needs for housing in Marin. The project website: https://www.marincounty.org/housingsafetyelements contains more information about upcoming activities.

Methodology

The County of Marin is conducting a variety of outreach activities to solicit community input. This survey was focused on the housing needs and desires for the county, and it was publicized in English and Spanish.

The County used the Survey Monkey platform for this survey, which was promoted extensively through County communication channels including post-card mail-outs, multiple email communications, and social media. Using both an online and paper format, the survey was shared with County residents via multiple Community-Based Organizations (CBOs) and publicized through online workshops.

The CBOs who supported the outreach effort included:

- Community Action Marin
- Community Land Trust Association of West Marin
- Lifehouse
- Marin Community Foundation / West Marin Community Services
- Marin Environmental Housing Collaborative (MEHC)
- San Geronimo Valley Affordable Housing Association
- Vivalon (serves people that need paratransit)
- West Marin Senior Services

The survey period ran from October through December 20th, 2021. There were 728 responses completed in English and 90 responses in Spanish, for a total of 818 responses.

Key Findings

Highlights of the survey results include:

Top housing choices for Unincorporated Marin County

Participants were asked to identify their top three housing priorities (out of seven choices).

- 59% of respondents selected “Increase the amount of housing that is affordable to moderate, low, and very low- income residents”
- 47% of respondents selected “Increase homeownership opportunities for moderate, low- and very-low-income residents”
- 33% identified “Create programs to help existing homeowners stay in their homes”
- The remaining 4 choices were selected by 23% to 28% of the respondents

There is insufficient housing in my community for:

Participants were asked to select all that apply from seven choices. The top three choices were:

- Low-income households (59%)
- Families with children (35%)
- Older adults: seniors, elderly (34%)

Top barrier to affordable housing

Participants were asked to identify the top barrier to affordable housing of out five choices.

- 55% identified “Limited availability of affordable units”
- The remaining choices received between 5% and 18% of the responses.

The survey included 12 questions that were multiple choice. Where appropriate, the responses also included “other” as a choice where participants could write in their response. There was also a thirteenth question that provided the opportunity for participants to add any additional comments.

The following sections present the survey results for each question based on responses received in English, Spanish, and the combined total. There is also a summary of the key themes from the open-ended comments received for each question. A full compilation of the comments is available as an appendix to this document.

Survey Results

The complete survey results are summarized below.

The English survey had 728 respondents:

- 626 responses online
- 102 responses through paper surveys

The Spanish survey had 90 Spanish respondents:

- 22 responses online
- 68 responses through paper surveys

The following charts show both the English and Spanish responses, as well as the combined results. Percentages are rounded to the nearest whole number. Not all participants responded to each question.

Question 1. What is your housing situation?

About 67% of respondents are homeowners, while 25% are renters. Most English respondents (75%) are homeowner while the majority of Spanish respondents (68%) are renters.

Responses	English	Spanish	Combined
I rent my home	144 (20%)	59 (68%)	203 (25%)
I own my home	540 (75%)	1 (1%)	541 (67%)
I live with family/friends, do not own or pay rent	33 (5%)	18 (21%)	51 (6%)
I don't have permanent housing	6 (1%)	9 (10%)	15 (2%)
Total	**723 English respondents**	**87 Spanish respondents**	**810 combined respondents**

Question 2. Where do you live?

About 54% of respondents live within unincorporated Marin County.

Responses	English	Spanish	Combined
Unincorporated Marin County	425 (59%)	16 (19%)	441 (54%)
A city within Marin County (San Rafael, Corte Madera, Larkspur, Mill Valley, Ross, Sausalito, Tiburon, Novato, San Anselmo)	279 (39%)	70 (80%)	349 (43%)
I do not live in Marin County	19 (3%)	1 (1%)	20 (2%)
Total	**723 English respondents**	**87 Spanish respondents**	**810 combined respondents**

Question 3. If you responded that you live in Marin County, please tell us where exactly.

The results shown in chart below represent only the response options that received more than 5% of the results in at least one of the languages or in the combined count.

Responses	English	Spanish	Combined
Unincorporated San Rafael: Santa Venetia	37 (5%)	3 (4%)	40 (5%)
Unincorporated San Rafael: Other part of Unincorporated San Rafael	26 (4%)	13 (16%)	39 (5%)
Unincorporated Novato	50 (7%)	1 (1%)	51 (7%)
Marinwood/Lucas Valley	36 (5%)	1 (1%)	37 (5%)
Unincorporated Southern Marin: Marin City	10 (1%)	8 (10%)	18 (2%)
Unincorporated Southern Marin: Tam Valley/Almonte/Homestead	96 (14%)	0 (0%)	96 (13%)
Unincorporated Central Marin: Kentfield/Greenbrae	62 (9%)	1 (1%)	63 (8%)
I do not live in unincorporated Marin County	186 (28%)	41 (51%)	227 (30%)
Total *(Not all responses are listed above)*	**779 English respondents**	**81 Spanish respondents**	**760 combined respondents**

Question 4. Do you work in Marin County?

About 47% of respondents work in Marin County, and 18% work outside the County. A significant portion of the English respondents (37%) do not work, are retired, unemployed or unable to work.

Responses	English	Spanish	Combined
Yes	290 (44%)	63 (77%)	353 (47%)
No	128 (19%)	7 (9%)	135 (18%)
I do not work (retired, unemployed, unable to work, or other)	247 (37%)	12 (15%)	259 (35%)
Total	**665 English respondents**	**82 Spanish respondents**	**747 combined respondents**

Question 5. How long have you lived in Marin County (city or unincorporated)?

Most respondents (75%) in English and Spanish combined have lived in Marin County for over ten years.

Responses	English	Spanish	Combined
Less than 1 year	10 (2%)	9 (11%)	19 (3%)
1-5 years	52 (8%)	18 (22%)	70 (9%)
5-10 years	69 (10%)	7 (8%)	76 (10%)
10 + years	516 (77%)	49 (59%)	565 (75%)
I do not live in Marin County	19 (3%)	0 (0%)	19 (3%)
Total	**666 English respondents**	**83 Spanish respondents**	**749 combined respondents**

Question 6. What is your race / ethnicity?

Of all the survey respondents, 70% identify as White / Caucasian, and another 16% identify as Hispanic / Latino.

Responses	English	Spanish	Combined
White / Caucasian	519 (79%)	1 (1%)	520 (70%)
Black / African Ancestry	4 (1%)	0 (0%)	4 (1%)
Asian / Asian Ancestry	30 (5%)	1 (1%)	31 (4%)
Hispanic / Latino	35 (5%)	81 (95%)	116 (16%)
Pacific Islander	8 (1%)	0 (0%)	8 (1%)
Native American, or Indigenous	6 (1%)	0 (0%)	6 (1%)
Two or more races	21 (3%)	0 (0%)	21 (3%)

I prefer not to say	52 (8%)	1 (1%)	53 (7%)
I prefer to self-identify	17 (3%)	1 (1%)	18 (2%)
Total	**660 English respondents**	**85 Spanish respondents**	**745 combined respondents**

Question 7. What is your age?

Most respondents (56%) are between the ages of 30 and 64 years old and 38% are over the age of 65.

Responses	English	Spanish	Combined
17 or under	1 (0%)	1 (1%)	2 (0%)
18-29	25 (4%)	16 (19%)	41 (5%)
30-49	142 (21%)	52 (63%)	194 (26%)
50-64	210 (32%)	14 (17%)	224 (30%)
65 or older	287 (43%)	0 (0%)	287 (38%)
Total	**665 English respondents**	**83 Spanish respondents**	**748 combined respondents**

Question 8. What percentage of your income is spent on housing costs (including rent and utilities or mortgage, property tax, and homeowner's insurance)?

One third of respondents (37%) spend between 30% and 50% of their income on housing costs, while another 19% of respondents spend over 50% of their income. In total, 56% of respondents stated that they spend over 30% of their income on housing costs. From the Spanish respondents alone, almost 60% of those who responded to the survey spend more than 50% of their income on housing costs.

Responses	English	Spanish	Combined
Less than 30% of income	260 (40%)	11 (13%)	271 (37%)
Between 30-50% of income	254 (39%)	18 (22%)	272 (37%)
More than 50% of income	95 (14%)	48 (59%)	143 (19%)
Does not apply	48 (7%)	5 (6%)	53 (7%)
Total	**657 English respondents**	**82 Spanish respondents**	**739 combined respondents**

Question 9. How well does your current housing meet your needs?

While 69% of the combined respondents stated they were satisfied with their housing, about 18% of the Spanish respondent selected that their unit is "substandard or in bad condition and need [their] landlord to respond."

Responses	English	Spanish	Combined
I am satisfied with my housing	478 (73%)	26 (34%)	504 (69%)
I would like to downsize but am unable to find a smaller unit	25 (4%)	6 (8%)	31 (4%)
I am unable to house additional family members	35 (5%)	13 (17%)	48 (7%)
My unit is substandard or in bad condition and I need my landlord to respond	9 (1%)	14 (18%)	23 (3%)
My unit is in bad condition, and I cannot afford to make needed repairs	18 (3%)	3 (4%)	21 (3%)
My unit needs improvements to make it easier to live with a disability	21 (3%)	6 (8%)	27 (4%)
None of the above	72 (11%)	9 (12%)	81 (11%)
Total	**658 English respondents**	**77 Spanish respondents**	**735 combined respondents**

Question 10. Select the top 3 housing priorities for unincorporated Marin County.

Of the combined respondents, 59% agreed that increasing "the amount of housing that is affordable to moderate, low, and very low-income residents" was among their top housing priorities. The second highest selected option was to "increase homeownership opportunities for moderate, low- and very low-income residents," which was selected by 47% of the combined respondents. The third highest option selected among the English respondents was "Create programs to help existing homeowners stay in their homes" with 36% of English respondents selecting this option. Among the Spanish respondents, the third highest selected option, with 33% of Spanish results, was "Make it easier to build new housing in unincorporated Marin County."

Responses	English	Spanish	Combined
Increase the amount of housing that is affordable to moderate, low, and very low- income residents	382 (57%)	63 (73%)	445 (59%)
Make it easier to build new housing in unincorporated Marin County	180 (27%)	28 (33%)	208 (28%)
Create programs to help existing homeowners stay in their homes	238 (36%)	11 (13%)	249 (33%)
Target efforts to address inequities in the housing market, including discrimination in renting	213 (32%)	15 (17%)	228 (30%)
Increase homeownership opportunities for moderate, low- and very-low-income residents	313 (47%)	40 (47%)	353 (47%)
Improve substandard housing conditions	176 (26%)	24 (28%)	200 (27%)
Other (please specify)	170 (25%)	7 (8%)	177 (23%)
Total	**668 English respondents**	**86 Spanish respondents**	**754 combined respondents**

Summary of additional comments included:

- A desire to build more moderate and low-income housing
- Desire for more programs that support affordable homeownership
- Support for current residents to be able to stay in Marin
- Suggestions to keep higher density developments near transportation, in city centers, and where infrastructure for utilities already exists
- Desire to preserve the open space, parks, and agricultural land within the County
- Concerns about how the character of towns and neighborhoods might change with higher density
- Concerns for limited water due to drought
- Concerns for increased traffic due to more housing
- Hesitancy for increased density and more development

Question 11. There is insufficient housing in my community for (please select all that apply).

The top three choices by the combined responses were:

- Low-income households (59%)
- Families with children (35%)
- Older adults: seniors, elderly (34%)

Responses	English	Spanish	Combined
Families with children	202 (32%)	49 (62%)	251 (35%)
Low-income households	369 (58%)	53 (67%)	422 (59%)
Older adults (Seniors, Elderly)	235 (37%)	8 (10%)	243 (34%)
Single individuals	189 (29%)	10 (13%)	199 (28%)
Persons with disabilities	156 (24%)	7 (9%)	163 (23%)
I don't know	129 (20%)	4 (5%)	133 (18%)
Other (please specify)	108 (17%)	3 (4%)	111 (15%)
Total	**641 English respondents**	**79 Spanish respondents**	**720 combined respondents**

Note: Percentages will total over 100% since respondents were allowed to select multiple options.

Summary of additional comments included:

- Desire for more rental options
- Insufficient housing for local workers resulting in workers having to live outside of Marin County
- Lack of options for those experiencing and/or are at risk of homelessness
- Insufficient housing for middle-income families, single individuals, and older adults
- Support for more moderate- to low-income housing
- Concerns about how diversity has decreased over the years
- Desire to preserve open land space and parks within the county
- Concerns of expansion due to climate change impacts
- Sentiment that there was already sufficient housing in Marin County

Question 12. Please identify the top barrier to affordable housing.

The top barrier to affordable housing according to the respondents is the limited available of affordable units (55% of combined results, and 60% of English-only responses). Spanish respondents selected the lack of resources to help find affordable housing as their top barrier (64% of Spanish-only results).

Responses	English	Spanish	Combined
Lack of resources to help find affordable housing	64 (10%)	50 (64%)	114 (16%)
Limited availability of affordable units	376 (60%)	8 (10%)	384 (55%)
Long waitlists	32 (5%)	13 (17%)	45 (6%)
Quality of affordable housing does not meet my standards	30 (5%)	3 (4%)	33 (5%)
Other (please specify)	123 (20%)	4 (5%)	127 (18%)
Total	**625 English respondents**	**78 Spanish respondents**	**703 combined respondents**

Summary of additional existing barriers included:

- NIMBY ("not in my back yard") housing policies
- Insufficient water supply
- Lack of rental opportunities
- General lack of affordable housing
- Limited homeownership opportunities or inundated waitlists for homeownership
- Lack of affordable housing due to city regulations such as zoning, permit fees, etc.
- Low paying jobs and lack of living wages is a barrier of entry to living in Marin
- Desire to keep Marin County population small and build more densely in other places outside of Marin County such as San Francisco
- Pushback against building affordable housing
- Some respondents believe there are no barriers or that this is a marketplace issue

Question 13. Please share any other comments you have related to housing in Marin County

	English	Spanish	Combined
Total	**380 English respondents**	**50 Spanish respondents**	**430 combined respondents**

The following summarizes the key themes mentioned in the 430 comments:

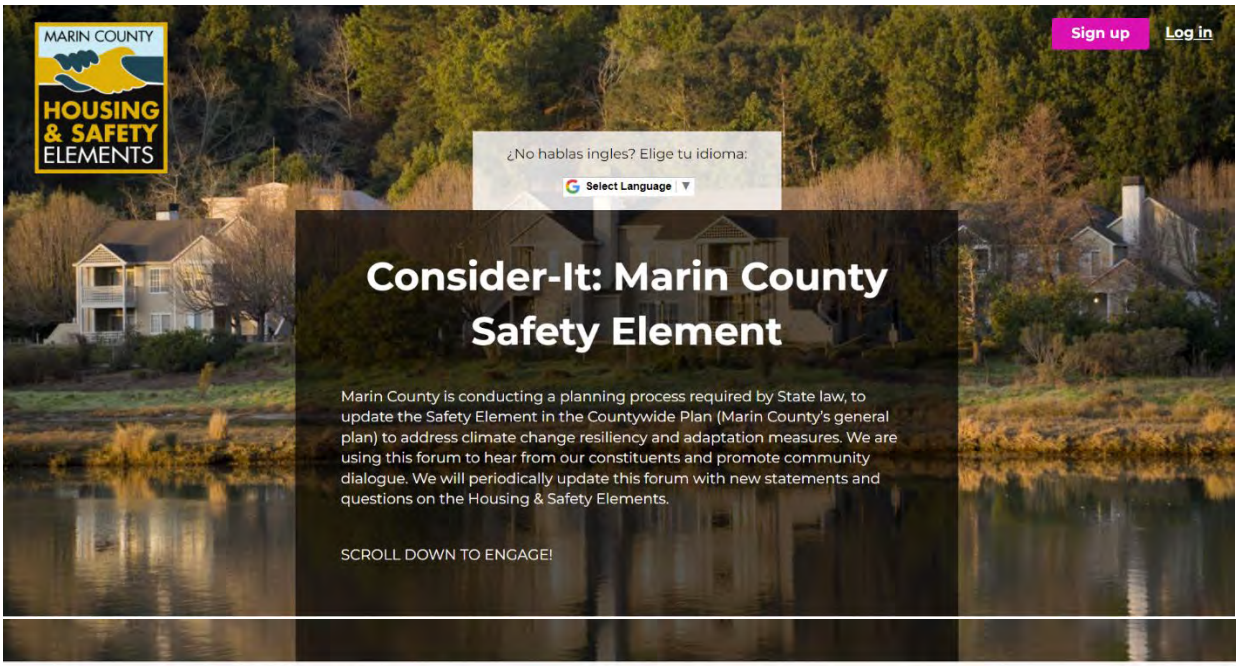
- Support for more low-income to middle-income housing
- Support for affordable units for seniors
- Support for additional workforce housing
- Frustration with housing barriers such as limited availability and long waitlists
- Concern for how additional units may affect the strained local water supply
- A desire for infrastructure issues such as limited water supply, transportation (increased traffic and road damage), and flooding concerns, to be addressed before building additional units
- Respondents shared that regulatory burdens slow down development
- Desire to keep existing open land space preserved
- A desire to keep Marin population less dense
- Concern for short term rentals and/or vacation rentals that take homes off the market for long term renters
- Concern over existing inequitable housing practices and discrimination

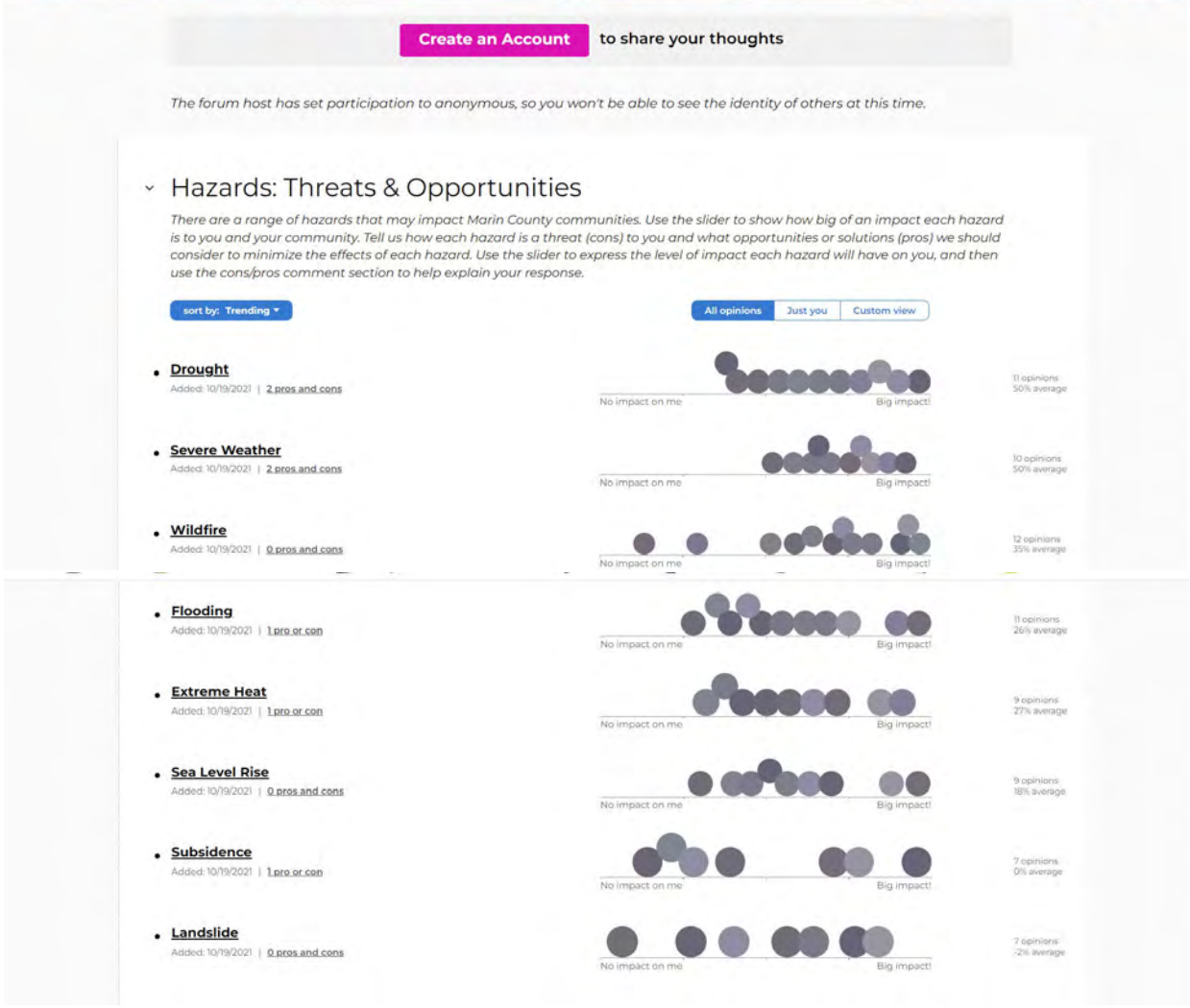
Appendix

Attached are additional documents, including:

- Charts summarizing English and Spanish results (in PowerPoint File)
- Summarized data for English and Spanish results, with list of additional comments (in Excel File)
- Full raw data from survey results (in Excel File)

[Consider It Webpage]





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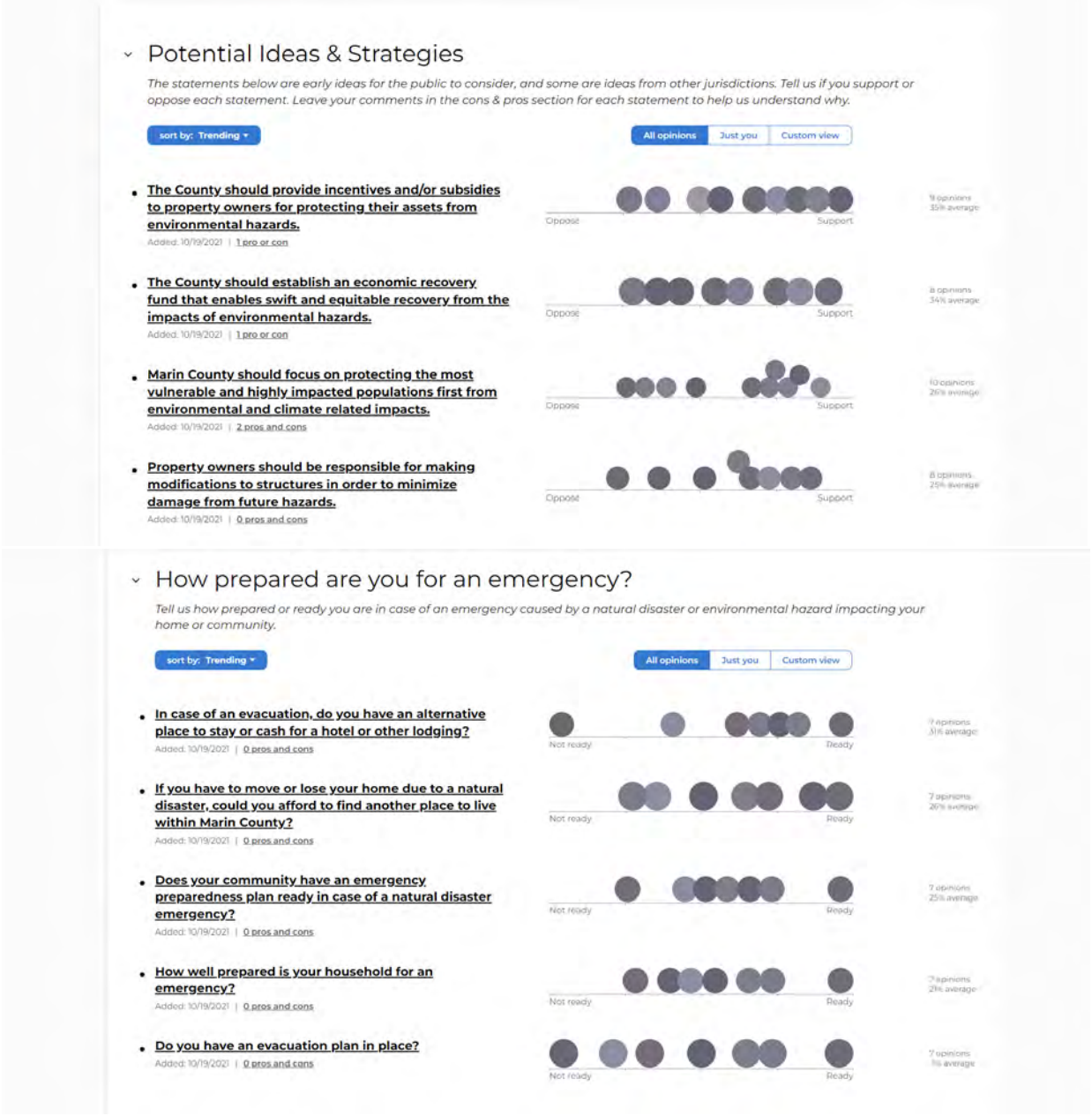

Marin County Housing Element
Candidate Housing Sites and Selection Process
Comments

Summary
Marin County conducted a robust process to share information and to solicit feedback on the process used to identify housing sites for inclusion in the Marin County Housing Element. The County is required by state law to prepare a plan which identifies sites where its assigned Regional Housing Needs Allocation (RHNA) of 3,956 housing units at different income levels can be built. While the County does not build the planned housing, they must, along with the specific sites, provide the zoning and policies and programs to ensure these sites can be developed.

At a December 7th meeting, the Board of Supervisors provided direction on a set of guiding principles to guide the process. One of the principles directed for substantive public engagement. Between late January 2022 and mid-March 2022, the County provided a variety of opportunities and formats for the public to use to share their feedback through written and verbals comments and use of digital tools. They included:

Outreach Opportunity	Comment Methods
On-line community workshop January 20	Participants could ask questions and submit comments in the chat.
County-wide Roads Shows	Ten virtual meetings were conducted at Design Review Board, Community and neighborhood specific locations throughout the County. Depending on the meeting, participants could comment verbally and/or in writing using the chat feature.
Balancing Act Digital Tool*	On-line digital tool that allowed participants to balance the sites to meet a desired number of units. It also allowed for site specific comments. **County staff held 4 sessions of office hours to assist anyone who had questions about how to use the tool.*
Marin County Atlas	On-line map that showed natural hazards and constraints to be considered. Users could consult the details of a specific property and make site specific comments.

To make it easier for the team to review the comments, the attached tables were created to organize the written comments submitted using various tools. They are attached to this document as an appendix.

Marin County Housing Element: Candidate Housing Sites and Selection Process Comments Received via Email or Balancing Act Submissions – Key Themes

PCL—Incorrect or Inconsistent Categorization of Parcels: Parcels have been incorrectly or arbitrarily categorized in the Draft Candidate Housing Sites List.
INF—Limited Infrastructure: Sites have limited infrastructure and/or limited capacity to support sufficient infrastructure for more development.
SER—Insufficient / Limited Access to Schools, Services, etc. Sites lack sufficient access to or resources to support schools, proximity to jobs, shopping, and amenities, and other required services.
TRF—Traffic Congestion: Site unsuitable due to traffic congestion
PRK—Lack of Parking: Site unsuitable due to lack of parking
PTR—Lack of Public Transportation: Site lacks access to public transportation
ACT—Lack of Active Transportation Infrastructure: Lack of safe access for pedestrians and bicyclists
NMR—No More Room for Additional Development or Too Much Additional Development Proposed: Site has no more room/infrastructure capacity etc. for development or is already overdeveloped, or the amount of additional development proposed is too much for the site.
SEA—Threat of Sea Level Rise / Current Flooding: Area is prone to sea level rise and/or current flooding. Makes the entire site unsuitable, or development should be limited to levels above the sea rise/flood zone.
NAT—Impacts Natural / Agricultural Resources: development on site will impact natural and/or agricultural resources; located in rural area which is not appropriate for development
CUL—Impacts Cultural Resources: Impacts tribal site or other cultural resources
FIR—Fire Risk / Limited Access for Emergency Services: site unsuitable due to fire risk / limited access for exit or egress in case of fire / limited access for emergency vehicles
WAT—Lack of Water / Septic Water Issues: Not enough water currently or for more development; insufficient clean water and septic issues
HLT—Air Quality / Chemicals / Other Health Impacts: Additional development will impact air quality, add toxins to the environment, or otherwise create negative impacts on community health.
EQT—Inequitable Development / Need for Equitable Development: Affects equitable housing; either it will improve housing equity OR site already has a majority of public housing/low income units in area; or will not assist in providing equitable housing / improving housing equity.
GDL—Good location: Identified as good location for housing; may be some caveats

MARIN COUNTY HOUSING ELEMENT: CANDIDATE HOUSING SITES AND SELECTION PROCESS
COMMENTS RECEIVED VIA EMAIL

Location	Comment	Source	PCL	INF	SER	TRF	PRK	PTR	ACT	NMR	SEA	NAT	CUL	FIR	WAT	HLT	EQT	GDL
1009 Idleberry (Lucas Valley/Marinwood)	I am concerned since I never received this notice. I learned about it from one neighbor on Thursday 2/24. How were property owners in this area notified? How many homeowners have you contacted. I don't know any who has been notified except the neighbor that told me. Please give me the courtesy of a response. This is a lovely area but with many limitations & constraints for development – infrastructure limited ingress & egress on Lucas Valley Road schools etc. Additionally this is a WUI wildfire area. A recent minor fire caused limited area evacuations. I was evacuated and this small event caused alarming road congestion. In case of a more extensive fire it would be a disaster.	Email		X	X	X								X				
1501 Lucas Valley Road (Lucas Valley/Marinwood)	I am concerned since I never received this notice. I learned about it from one neighbor on Thursday 2/24. How were property owners in this area notified? How many homeowners have you contacted. I don't know any who has been notified except the neighbor that told me. Please give me the courtesy of a response. This is a lovely area but with many limitations & constraints for development – infrastructure limited ingress & egress on Lucas Valley Road schools etc. Additionally this is a WUI wildfire area. A recent minor fire caused limited area evacuations. I was evacuated and this small event caused alarming road congestion. In case of a more extensive fire it would be a disaster.	Email		X	X	X								X				
223 Shoreline HIghway (Tam Junction)	(Comment edited for length) Sustainable TamAlmonte has the following comments and recommendations regarding the merits of the above referenced Tam Valley, Almonte, and Manzanita Candidate Housing Sites listed in the 2023-2031 Housing Element DRAFT Candidate Housing Sites List. Due to the unique characteristics of the area, encouraging residential development, especially high-density development, at the above referenced Sites would increase the risk of undue harm to the environment and undue hardship, illness, injury and/or death to the current and future residents. The Tam Valley, Almonte, and Manzanita commercial lowlands, in which the above referenced sites are located, experience the most number of environmental constraints and hazards of any area in Unincorporated Marin. Both the Marin Countywide Plan's EIR and the 2012 Housing Element's SEIR demonstrate that development at these sites would exacerbate the existing dangerous conditions and add new significant adverse environmental impacts (which) magnifies the probability that a tragedy would ensue and the multiple mitigations that a developer would need to fulfill would cause development costs to soar. These factors make the sites unsuitable for affordable housing. The only acceptable course of action is to eliminate the sites from the inventory. Below is a list of the unique natural features, hazards, and limited resources in the Tam Valley, Almonte, and Manzanita lowlands that constrain development and population growth and substantiate our argument. For a quick overview of these constraints, please view the attached table. I. Dangerous Traffic with Unacceptable Level Of Service – LOS "F" Of Local Roadways:. II. Flooding, 100 Year Floodplain, Impending Sea Level Rise III. Filled Marsh Areas With High Seismic Activity, Liquefaction, Subsidence and Mud Displacement. IV. Air Quality & Noise: Increased Risk of Residents Developing Serious Illness Due to Living Near Major Roadways. V. Hazardous Materials: For additional information regarding potential health impacts to workers and future residents who may be exposed to hazardous soil conditions, related to past uses, in Tam Junction and Manzanita, please follow the below link to read the comment letter by Technical Expert Matt Hagemann. VI. Endangered Special Status Species. VII. Insufficient Services & Public Transit. VIII. Historic Wetlands and Baylands Corridor. IX. Historic Marshland That Could Be Restored. 160 Shoreline Hwy and 260 Redwood Hwy Frontage Rd. are historic marshland. X. High Density Development Is Not Consistent With the Traditional Character Of The Local Semi-Rural Communities. Conclusion: The County now has sufficient information to understand that the proposed Tam Valley, Almonte, and Manzanita Sites are inappropriate for inclusion in the 2023-2031 Housing Element Candidate Housing Sites Inventory. Not only would construction of housing on these sites exacerbate the already existing problems but doing so when the County admits in the Marin Countywide Plan EIR and 2012 Housing Element's FSEIR that significant adverse unavoidable impacts would result from such construction defies logic. Moreover, there can be no benefit that would override the impacts of environmental harm and severe illness, injury or loss of life from building on the Tam Valley, Almonte, and Manzanita Candidate Housing Sites, which are laden with environmental constraints and dangerous hazards. The best course of action would be for the County to revise the list to reflect the current problems with traffic, seismic activity, hazardous soil conditions, air and noise pollution, water supply, flooding, and impending sea level rise and to find that no new residential development in the Tam Junction & Manzanita areas is appropriate. Such action would be consistent with the Board of Supervisors' sensible decisions.	Email (See Email Comments Received.PDF, pp. 123-151)	X	X	X	X		X		X	X	X	X	X	X	X		
223 Shoreline HIghway (Tam Junction)	(Comment edited for length) Sustainable TamAlmonte has the following comments and recommendations regarding the merits of the above referenced Tam Valley, Almonte, and Manzanita Candidate Housing Sites listed in the 2023-2031 Housing Element DRAFT Candidate Housing Sites List. Due to the unique characteristics of the area, encouraging residential development, especially high-density development, at the above referenced Sites would increase the risk of undue harm to the environment and undue hardship, illness, injury and/or death to the current and future residents. The Tam Valley, Almonte, and Manzanita commercial lowlands, in which the above referenced sites are located, experience the most number of environmental constraints and hazards of any area in Unincorporated Marin. Both the Marin Countywide Plan's EIR and the 2012 Housing Element's SEIR demonstrate that development at these sites would exacerbate the existing dangerous conditions and add new significant adverse environmental impacts (which) magnifies the probability that a tragedy would ensue and the multiple mitigations that a developer would need to fulfill would cause development costs to soar. These factors make the sites unsuitable for affordable housing. The only acceptable course of action is to eliminate the sites from the inventory. Below is a list of the unique natural features, hazards, and limited resources in the Tam Valley, Almonte, and Manzanita lowlands that constrain development and population growth and substantiate our argument. For a quick overview of these constraints, please view the attached table. I. Dangerous Traffic with Unacceptable Level Of Service – LOS "F" Of Local Roadways:. II. Flooding, 100 Year Floodplain, Impending Sea Level Rise III. Filled Marsh Areas With High Seismic Activity, Liquefaction, Subsidence and Mud Displacement. IV. Air Quality & Noise: Increased Risk of Residents Developing Serious Illness Due to Living Near Major Roadways. V. Hazardous Materials: For additional information regarding potential health impacts to workers and future residents who may be exposed to hazardous soil conditions, related to past uses, in Tam Junction and Manzanita, please follow the below link to read the comment letter by Technical Expert Matt Hagemann. VI. Endangered Special Status Species. VII. Insufficient Services & Public Transit. VIII. Historic Wetlands and Baylands Corridor. IX. Historic Marshland That Could Be Restored. 160 Shoreline Hwy and 260 Redwood Hwy Frontage Rd. are historic marshland. X. High Density Development Is Not Consistent With the Traditional Character Of The Local Semi-Rural Communities. Conclusion: The County now has sufficient information to understand that the proposed Tam Valley, Almonte, and Manzanita Sites are inappropriate for inclusion in the 2023-2031 Housing Element Candidate Housing Sites Inventory. Not only would construction of housing on these sites exacerbate the already existing problems but doing so when the County admits in the Marin Countywide Plan EIR and 2012 Housing Element's FSEIR that significant adverse unavoidable impacts would result from such construction defies logic. Moreover, there can be no benefit that would override the impacts of environmental harm and severe illness, injury or loss of life from building on the Tam Valley, Almonte, and Manzanita Candidate Housing Sites, which are laden with environmental constraints and dangerous hazards. The best course of action would be for the County to revise the list to reflect the current problems with traffic, seismic activity, hazardous soil conditions, air and noise pollution, water supply, flooding, and impending sea level rise and to find that no new residential development in the Tam Junction & Manzanita areas is appropriate. Such action would be consistent with the Board of Supervisors' sensible decisions.	Email (See Email Comments Received.PDF, pp. 123-151)	X	X	X	X		X		X	X	X	X	X	X	X		
254 Lucas Valley Road near Terra Linda Ridge	I am writing to urge you NOT to approve the Marinwood/Lucas Valley sites under consideration to satisfy the Association of Bay Area Governments Regional Housing Needs Allocation Plan. Developments at these six sites (St. Vincent's School, Marinwood Market, 530 Blackstone Drive, 7 Mt. Lassen, 2 Jeannette Prandi Way, and Lucas Valley Road near Terra Linda Ridge) would result in more than 2300 housing units. While I know that some of the proposed housing is intended for teachers and other critical workers and for low income housing, both of which are important and necessary, it seems like too much development for the infrastructure of this small area. Additionally, all of these proposed development sites are within the Miller Creek School District boundaries and the unfunded impact of these developments on the District would be disastrous. Since the District is currently funded using a Basic Aid Model, it gets no per pupil funding. This means that all the additional students these developments generate will not result in additional funding for the District.	Email		X	X					X							X	
254 Lucas Valley Road near Terra Linda Ridge	I found the online tools for commenting cumbersome and inscrutable, and much too time consuming to use. So, the following are my comments about specific housing allotment recommendations in Marinwood Lucas Valley. Lucas Valley Rd/near terra Linda Ridge: 26 Where is this? Where the stable is now located?	Email																

MARIN COUNTY HOUSING ELEMENT: CANDIDATE HOUSING SITES AND SELECTION PROCESS
COMMENTS RECEIVED VIA EMAIL

Location	Comment	Source	PCL	INF	SER	TRF	PRK	PTR	ACT	NMR	SEA	NAT	CUL	FIR	WAT	HLT	EQT	GDL
254 Lucas Valley Road Near Terra Linda Ridge	I'm taking this opportunity as a resident of Upper Lucas Valley in Marin to voice my views/concerns about the housing sites under consideration in my area: In general: I don't know what constitutes median vs low income, but in general I support add'l housing strategically placed and sensitively designed (to minimize negative impact on the environment and established communities) for essential workers such as school teachers, sheriff, police & fire dept and hospital staffers, many of whom currently commute long distances to work in the areas they serve. I'd like to see new homeowning opportunities (at below market rates) made available to these workers, as building more high-priced rental units serves no one but property owners.Sites under consideration in the Marinwood/Lucas Valley areas: St Vincent's School – 1800; Marinwood Market – 136. These are both logical, less problematic sites for development, as they are walkable to the GG bus stop at/near Miller Creek & Marinwood Aves, with quick, easy access to the 101 fwy. I really hope to see sensitive urban planning on the St. Vincents site, so the beautiful open space currently grazed by cows does not become yet another soulless jungle of buildings standing shoulder to shoulder facing the freeway. Speaking as someone who's actually rooting for the Smart Train to not only survive, but thrive: part of any development of these sites should include a bike path/paths to connect either or both to the Civic Center Smart station. And/or a shuttle bus (it's too long to walk for commuters).530 Blackstone Drive (site of religious house) – 32. I've no knowledge/opinion re: this site. 7 Mt Lassen (site of office park) – 58. 2 Jeannette Prandi Way (site of Juvenile Hall) – 254. My husband & I currently rent an office at 7 Mt. Lassen, so it's news to us that this site's under consideration. It's a beautiful, unique office setting that serves both the Upper and Lower Lucas Valley communities as a place of business to walk to! I'd hate to see that disappear!!! However, I wouldn't be adverse to seeing a portion of the current 7 Mt. Lassen structures converted to work/live spaces, if sensitively planned. Maybe 30%. My comments re: St. Vincents also apply to Jeannette Prandi Way. As long as new development is against the hills with access via Idylberry Rd, away from Lucas Valley Rd, and sensitively planned, I'm not totally adverse to new development. However the # of units proposed is too high!** Lucas Valley Rd/near terra Linda Ridge: 26. I don't know exactly where this is, but in principle I'm against it. **The problem with all new development close to Lucas Valley Rd is not merely degradation of the scenic route of LVR — but more importantly, adding traffic congestion to a wildfire interface area with a single ingress/egress. I'm an LVHA block captain, and was present and part of the fire evacuation on Sept 1st 2021... a learning experience. It's for this reason that I signed the petition against development in Lucas Valley. I believe that the current Northgate Mall could and should be a site for mixed-use development including low-to median income housing, yet is not on this list of proposed sites. It ticks all the boxes for access to transportation, schools, shopping, etc.	Email	X		X	X		X	X			X		X			X	X
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2800 West Novato Blvd., Novato	If you need MORE " VERY LOW AND LOW INCOME" and " MODERATE INCOME " sites closer to Novato, our property at 2800 West Novato Blvd has plenty of room and space. Thank you. We appreciate all your hard work here	Email																		X

Location	Comment	Source	PCL	INF	SER	TRF	PRK	PTR	ACT	NMR	SEA	NAT	CUL	FIR	WAT	HLT	EQT	GDL
4260 Sir Francis Drake Boulevard, Woodacre	Hello Supervisor Rodoni, This message is regarding the Housing Element site proposals. Like yourself, I was born and raised in West Marin County. My family has been ranching in Marin for 5 generations, and our love for the land and community runs deep. We understand that there is a need for more affordable housing in Marin, however; We oppose any development at 4260 Sir Francis Drake Boulevard (TUHS). Development on said property would be a detriment to the Valley consider how the lack of public transportation, water access, septic/sewage and the increase of traffic would impact the surrounding area - community, environment and wildlife as a whole. There are many other places in Marin where housing can be developed and integrated into the surrounding area to the benefit of the community. We are asking you to conserve the land at 4260 Sir Francis Drake Boulevard. Thank you for your time.	Email				X		X				X		X	X			
530 Blackstone Drive (Marinwood / Lucas Valley)	(Comment edited for length) The Lucas Valley Homeowner's Association represents 538 homes in the special R-1:B-LV zoning track in Upper Lucas Valley. We, the Board of Directors of the LVHA, would like to give our support for the efforts to increase housing in Marin County, and offer the following input. To begin with, our State Governor's Housing Plan incentivizes housing in urban centers near transportation and services, to reduce reliance on vehicles and their carbon footprint. If the County chooses a path contrary to the State Plan, and not utilize State funding incentives for urban development, then we ask for a reevaluation of the housing sites identified for our Lucas Valley/Marinwood area. As outlined below, areas 1 - 3 are both contrary to the RHNA requirements and pose a danger for emergency evacuations. There are several sites identified as potential home building sites in our area. 1. Lucas Valley Road / Mt Muir Court 2. Juvenile Detention Center/Jeanette Prandi Way 3. 7 Mt Lassen 4. 530 Blackstone Dr 5. Marinwood Market area. We agree that the Marinwood Market area is a suitable site. It is close to freeway access and has sufficient infrastructure in place, including amenities like food and gas, and can easily absorb new development. Ironically, the relative quantity proposed/identified at this site is comparably less than the quantity for site #2 above, which is a much less suitable site as shown in following comments. There are several factors that make areas 1 - 3 only marginally suitable for new building sites, and therefore should, at best, be only allowed limited building. Factors include: High Wildfire Risk - Single Limited Evacuation Route. Water Shortages. Lack of Infill Infrastructure. Building Atop Unmarked Graves. Zoning Restrictions: The special zoning district for Upper Lucas Valley (R-1:B-LV) limits most buildings to a single story. The district was created in order to adhere to the architectural vision and design aesthetic of Joseph Eichler, a renowned architect highly influential in modern architecture. The existing low income senior living homes on Jeanette Prandi Way are likewise single story. If a housing development is allowed near the Juvenile Detention Center site, 7 Mt. Lassen, or Muir Court, they would have to be single story to maintain the character of the surrounding architectural landscape. This would limit the number of units allowed at these sites. Juvenile Detention Center: The concept of constructing multi-family housing at or adjacent to the Detention Center poses challenging logistical and feasibility issues. The County's attempts to reduce juvenile incarceration has been largely successful; however, not to the point where closure of the facility is possible. Marin County's criminal justice program continues to call for incarceration of violent youth offenders, and does not currently have an alternative detention facility. Consequently, any new housing at the Jeanette Prandi location would be adjacent to the Detention Center. It may be quite difficult to convince a developer to invest in a location where part of the "selling pitch" to residents is proximity to a detention center, particularly given that the facilities at Juvenile Hall are in major disrepair. Long History of Racial Parity. Among the factors the County is reviewing in selecting sites is historical discrimination. Our community has no such history and should not, therefore, be a priority for desegregation. Unlike many restrictive covenants in other neighborhoods in Marin County and across California, our CC&Rs have never contained language restricting homeownership based on race, creed, color or religion. Our community celebrates diversity, and we want to make clear we have no history of resisting it. Indeed, it has been reported by original LVHA members that our community attracted a large number of buyers of Asian descent as it was one of the few areas that they were not discriminated from buying into. Locating Housing Near Services and Transportation: The Board of Supervisors affirmed several principles for deciding potential Housing sites and distribution in 12/2021. The potential Housing sites listed for the Lucas Valley communities seem to ignore the mandate for locating housing near services and transportation. The Lucas Valley Community believes the County should be practical and realistic in identifying sites to satisfy the RHNA requirements that do not create a danger to existing communities, will actually serve the goals of the housing mandate, and that show homage to our beautiful and historically significant community. We respectfully request the County to rethink its "rural" VS "urban" housing development plans in light of the State's most recent Urban Housing strategy and funding incentives.	Email (See Email Comments Received.PDF, pp. 173-178)			X		X				X		X	X	X	X		X	
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530 Blackstone Drive (Marinwood / Lucas Valley)	I found the online tools for commenting cumbersome and inscrutable, and much too time consuming to use. So, the following are my comments about specific housing allotment recommendations in Marinwood Lucas Valley: 530 Blackstone Drive (site of religious house) - 32 ???	Email																
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MARIN COUNTY HOUSING ELEMENT: CANDIDATE HOUSING SITES AND SELECTION PROCESS
COMMENTS RECEIVED VIA EMAIL

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6 Jeanette Prandi Way (Lucas Valley)	I am concerned since I never received this notice. I learned about it from one neighbor on Thursday 2/24. How were property owners in this area notified? How many homeowners have you contacted. I don't know any who has been notified except the neighbor that told me. Please give me the courtesy of a response. This is a lovely area but with many limitations & constraints for development – infrastructure limited ingress & egress on Lucas Valley Road schools etc. Additionally this is a WUI wildfire area. A recent minor fire caused limited area evacuations. I was evacuated and this small event caused alarming road congestion. In case of a more extensive fire it would be a disaster.	Email		X	X	X								X				
6900 Sir Francis Drive Boulevard (San Geronino)	I could not access the Balancing Site work area so I am submitting these comments here. SGV is am amazing place to be due to low development. I have had the benefit of living here 25 years. What is being proposed in both of the areas of the School property and at the Gold Course are for higher end homes. Higher end homes are not a help for our community. We need homes for families with kids, We need Senior housing. We don't need another 127 above moderate income homes. Have some vision. Create a place with a grocery store, deli, and place for people to meet. Create Senior housing. Have ability to share vehicles. This area could become a hub for our community to use and support. It is also a sensitive environmental area. It used to be where water would spread out when it rained and slowly sink into the ground providing water all year round for the fish. More concrete and asphalt = more runoff. This vision of 98 separate high end homes here is not fitting to the rural area of our valley. It is just going to bring in more people who want a rural lifestyle from other areas and NOT give our locals homes. Every day, people, and families are looking for homes. Renters are being pushed out. It is unaffordable to live here. Solve the problem we have now, housing for our locals. Not bring more people here. Also, the place being considered at 6900 Sir Francis Drake is a privately owned place. Owned by a family that owns quite a bit of property in the Valley as it is. I certainly hope public monies are not going to rehab this property.	Email								X		X						X	

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7 Mt. Lassen (Marinwood / Lucas Valley)	I am writing to urge you NOT to approve the Marinwood/Lucas Valley sites under consideration to satisfy the Association of Bay Area Governments Regional Housing Needs Allocation Plan. Developments at these six sites (St. Vincent's School, Marinwood Market, 530 Blackstone Drive, 7 Mt. Lassen, 2 Jeannette Prandi Way, and Lucas Valley Road near Terra Linda Ridge) would result in more than 2300 housing units. While I know that some of the proposed housing is intended for teachers and other critical workers and for low income housing, both of which are important and necessary, it seems like too much development for the infrastructure of this small area. Additionally, all of these proposed development sites are within the Miller Creek School District boundaries and the unfunded impact of these developments on the District would be disastrous. Since the District is currently funded using a Basic Aid Model, it gets no per pupil funding. This means that all the additional students these developments generate will not result in additional funding for the District.	Email		X	X					X								X	
7 Mt. Lassen (Marinwood / Lucas Valley)	I found the online tools for commenting cumbersome and inscrutable, and much too time consuming to use. So, the following are my comments about specific housing allotment recommendations in Marinwood Lucas Valley. 7 Mt Lassen (site of office park) - 58: Would this replace office park? If so 58 apartments or condos seems reasonable. No market rate	Email															X	X
7 Mt. Lassen (Marinwood / Lucas Valley)	I'm taking this opportunity as a resident of Upper Lucas Valley in Marin to voice my views/concerns about the housing sites under consideration in my area: In general: I don't know what constitutes median vs low income, but in general I support add'l housing strategically placed and sensitively designed (to minimize negative impact on the environment and established communities) for essential workers such as school teachers, sheriff, police & fire dept and hospital staffers, many of whom currently commute long distances to work in the areas they serve. I'd like to see new homeowning opportunities (at below market rates) made available to these workers, as building more high-priced rental units serves no one but property owners.Sites under consideration in the Marinwood/Lucas Valley areas: St Vincent's School – 1800; Marinwood Market – 136. These are both logical, less problematic sites for development, as they are walkable to the GG bus stop at/near Miller Creek & Marinwood Aves, with quick, easy access to the 101 fwy. I really hope to see sensitive urban planning on the St. Vincents site, so the beautiful open space currently grazed by cows does not become yet another soulless jungle of buildings standing shoulder to shoulder facing the freeway. Speaking as someone who's actually rooting for the Smart Train to not only survive, but thrive: part of any development of these sites should include a bike path/paths to connect either or both to the Civic Center Smart station. And/or a shuttle bus (it's too long to walk for commuters).530 Blackstone Drive (site of religious house) – 32. I've no knowledge/opinion re: this site. 7 Mt Lassen (site of office park) – 58. 2 Jeannette Prandi Way (site of Juvenile Hall) – 254. My husband & I currently rent an office at 7 Mt. Lassen, so it's news to us that this site's under consideration. It's a beautiful, unique office setting that serves both the Upper and Lower Lucas Valley communities as a place of business to walk to! I'd hate to see that disappear!!! However, I wouldn't be adverse to seeing a portion of the current 7 Mt. Lassen structures converted to work/live spaces, if sensitively planned. Maybe 30%. My comments re: St. Vincents also apply to Jeannette Prandi Way. As long as new development is against the hills with access via Idylberry Rd, away from Lucas Valley Rd, and sensitively planned, I'm not totally adverse to new development. However the # of units proposed is too high!** Lucas Valley Rd/near terra Linda Ridge: 26. I don't know exactly where this is, but in principle I'm against it. **The problem with all new development close to Lucas Valley Rd is not merely degradation of the scenic route of LVR — but more importantly, adding traffic congestion to a wildfire interface area with a single ingress/egress. I'm an LVHA block captain, and was present and part of the fire evacuation on Sept 1st 2021... a learning experience. It's for this reason that I signed the petition against development in Lucas Valley. I believe that the current Northgate Mall could and should be a site for mixed-use development including low-to median income housing, yet is not on this list of proposed sites. It ticks all the boxes for access to transportation, schools, shopping, etc.	Email	X		X	X		X	X			X		X			X	X
7 Mt. Lassen (Marinwood / Lucas Valley)	Thank you for taking time to read over my thoughts on the new housing developments proposed for Jeanette Prandi Way, Mount Muir Court, Marinwood Plaza and 7 Lassen. As a Marin County native of 58 years and a Lucas valley resident of 26 years, I am surprised that these projects are so close to approval without adequate community outreach and input. There are many items of concern that I don't feel have been adequately answered for me to support these developments. At this time I am strongly opposed to these developments. I am respectfully requesting more time for our community to better understand these proposals and how we can collaboratively help the County solve its low income housing challenges.	Email																

Location	Comment	Source	PCL	INF	SER	TRF	PRK	PTR	ACT	NMR	SEA	NAT	CUL	FIR	WAT	HLT	EQT	GDL
7 Mt. Lassen (Marinwood / Lucas Valley)	This letter is in regards to the proposed site and distribution of housing in the Lucas Valley/Marinwood area. While I feel this area can support some expansion, the amount proposed by the county is overwhelming. Per the board of supervisors principles, please note my feedback below. 1: Ensure Countywide Distribution: The majority of housing in unincorporated Marin County is being distributed to Marinwood/LUCAS VALLEY. This does not appear to be an equitable distribution and will potentially double the population of this area, affecting all services- sheriff, fire, schools, traffic, etc. Marinwood/LUCAS VALLEY area is being considered for a majority of this housing in unincorporated Marin: St Vincents: 1800 Marinwood Market: 136 Blackstone (site of religious house): 32 Mt Lassen/deli: 58 Jeanette Prandi/Juvi: 254 Lucas Valley Rd/near terra Linda Ridge: 26 Total: 2306. (This could be up to 60% of the total housing for unincorporated Marin) Households in Marinwood/LUCAS VALLEY currently 2412. (This could potentially double our size)	Email		X	X	X				X				X				
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7 Mt. Lassen (Marinwood / Lucas Valley)	We have seen the preliminary list of potential housing sites for Marin County, including in unincorporated areas such as Marinwood/Lucas Valley, as developed by the ABAG (Regional Housing Needs Allocation Plan), and approved by the California Department of Housing and Community Development. The plan includes 2,412 units within the Lucas Valley / Marinwood area (accounting for 68% of the 3,569 units within unincorporated Marin County). Sites under consideration in the Marinwood / Lucas Valley areas: St Vincent's School - 1,800; Marinwood Market – 136; 530 Blackstone Drive (site of religious house) - 32 7; Mt Lassen (site of office park) – 58; 2 Jeannette Prandi Way (site of Juvenile Hall); 254 LucasValley Rd/near terra Linda Ridge: 26. We are not opposed to some moderate increase of housing units in the area. However, we have some serious concerns regarding these potential sites: (1) The Lucas Valley / Marinwood area currently has less than roughly 1,750 homes, spread across a roughly 3.5 mile valley corridor, almost all of which are single family dwellings, and the overwhelming majority of which are one or two story homes. There are no large multi-unit apartment buildings in this area. The overall magnitude of the increase in units in this area (2,412 units) is disproportionately large compared to the current housing density of the area. The proposed increase would more than double the overall number of housing units in the area. (2) The area to the south and west of St. Vincent's School (east of HWY 101) has been discussed as a potential development site for some time. Although multi-unit housing could easily be developed there, adding 1,800 units would completely overwhelm the property and this very large number of additional units represents an enormous growth for the area, on the same order of units as currently exist in all of Lucas Valley / Marinwood. To fit this large number of units, the development would likely include large three (or more) story structures, which do not currently exist anywhere in this area. (3) The site at 530 Blackstone Drive (current site of religious house) could easily fit a multi-unit development, however 32 units on this site is far too large for the size of the property, which is near the end of a small half-mile residential street, that currently has less than 50 total housing units. (4) The site at 7 Mt. Lassen Drive (currently two relatively small two-story office buildings) is far too small to fit 58 housing units without the new structure extending to three or more stories. (5) The site at 2 Jeannette Prandi Way (south of the Juvenile Hall) is currently an open space area with a loop path that is regularly used by nearby residents (including residents of the nearby senior housing development) as a recreational walking, bike riding, etc. area (and dog walking area). This open space area has been in existence for well over thirty years and is a very popular area regularly used by many residents of the adjoining neighborhoods. A potential development consisting of 254 units on this site would completely eliminate a treasured and much-used open space area and would likely require a multi-story (three or more stories) structure. Very few of the homes in this area of Lucas Valley / Marinwood are more than one story (almost all are one-story Eichler homes). Such a large development is completely out of character with the current land use in this area and should absolutely not be allowed to be developed on this site. (6) These potential new housing units would represent an extremely large additional burden to traffic density in the area. (7) These potential new housing units would overwhelm the current capacity at our three elementary schools and one middle school. (8) These potential new housing units would create a very large additional demand for water resources in the Lucas Valley / Marinwood area which are currently very limited. The simple number (2,412) of potential additional housing units in the Lucas Valley / Marinwood area is much too large and would represent an approximate doubling of the current housing density in the area. Each of the proposed developments presents issues regarding the size of new structures (including constructing multi-story structures in areas where there are currently none), and would present issues concerning current resource capacities (including traffic, schools, and water). Thank you for your consideration of these issues when making decisions regarding potential new housing developments in the Lucas Valley / Marinwood area.	Email				X	X			X		X			X			
7 Mt. Lassen (Marinwood / Lucas Valley)	With respect to the Lucas Valley sites being considered as potential housing sites, I submit the following comments: Sites located at 7 Mt. Lassen Drive and at Lucas Valley Road/Mt Muir near Terra Linda Ridge fail to comply with stated criteria for site selection. These sites present environmental hazards, including high fire danger as exhibited last August when a wildfire approached housing and traffic became a hazard. These areas also fail to provide access to transportation, jobs, services, and amenities. Lucas Valley is an inappropriate choice. In addition, all of the Lucas Valley sites are in the wildland urban interface (WUI) zones that contradict Governor Newson's priorities to shift housing away from rural wildfire-prone areas and closer to urban centers.	Email	X			X		X		X		X		X				
70 Oxford Drive, Santa Venetia	RE: APN 180-261-10 Address: 70 Oxford Drive. The undersigned is owner of this large (27.8 acres, or approx. 1,211,000 sf) parcel. As currently zoned A2B2 (minimum lot size of 10,000 sf), it is extraordinarily and technically suitable for numerous residences. To help the County and the State to meet their Housing target, we agree with and welcome the proposed suggestion of multiple possible residences on this acreage, but suggest the number be reduced to a maximum of five (5). This necessarily lower number would result in (A) lot sizes more consistent with the surrounding neighborhood, as specifically recommended in the Santa Venetia Community Plan; (B) smaller homes consistent with the affordability targets; (C) lot configurations more accessible (requiring less ground disturbance) and least likely to conflict with numerous environmental and cultural constraints extant on the site; and (D) a density nearly ten times less than the initial proposal, thus significantly less negative impact on the current traffic congestion on NSPR which is the sole access/egress to Santa Venetia.	Email	X			X				X		X						

Location	Comment	Source	PCL	INF	SER	TRF	PRK	PTR	ACT	NMR	SEA	NAT	CUL	FIR	WAT	HLT	EQT	GDL
B - 160 Shoreline Highway (Almonte)	(Comment edited for length) Sustainable TamAlmonte has the following comments and recommendations regarding the merits of the above referenced Tam Valley, Almonte, and Manzanita Candidate Housing Sites listed in the 2023-2031 Housing Element DRAFT Candidate Housing Sites List. Due to the unique characteristics of the area, encouraging residential development, especially high-density development, at the above referenced Sites would increase the risk of undue harm to the environment and undue hardship, illness, injury and/or death to the current and future residents. The Tam Valley, Almonte, and Manzanita commercial lowlands, in which the above referenced sites are located, experience the most number of environmental constraints and hazards of any area in Unincorporated Marin. Both the Marin Countywide Plan's EIR and the 2012 Housing Element's SEIR demonstrate that development at these sites would exacerbate the existing dangerous conditions and add new significant adverse environmental impacts (which) magnifies the probability that a tragedy would ensue and the multiple mitigations that a developer would need to fulfill would cause development costs to soar. These factors make the sites unsuitable for affordable housing. The only acceptable course of action is to eliminate the sites from the inventory. Below is a list of the unique natural features, hazards, and limited resources in the Tam Valley, Almonte, and Manzanita lowlands that constrain development and population growth and substantiate our argument. For a quick overview of these constraints, please view the attached table. I. Dangerous Traffic with Unacceptable Level Of Service – LOS "F" Of Local Roadways:. II. Flooding, 100 Year Floodplain, Impending Sea Level Rise III. Filled Marsh Areas With High Seismic Activity, Liquefaction, Subsidence and Mud Displacement. IV. Air Quality & Noise: Increased Risk of Residents Developing Serious Illness Due to Living Near Major Roadways. V. Hazardous Materials: For additional information regarding potential health impacts to workers and future residents who may be exposed to hazardous soil conditions, related to past uses, in Tam Junction and Manzanita, please follow the below link to read the comment letter by Technical Expert Matt Hagemann. VI. Endangered Special Status Species. VII. Insufficient Services & Public Transit. VIII. Historic Wetlands and Baylands Corridor. IX. Historic Marshland That Could Be Restored. 160 Shoreline Hwy and 260 Redwood Hwy Frontage Rd. are historic marshland. X. High Density Development Is Not Consistent With the Traditional Character Of The Local Semi-Rural Communities. Conclusion: The County now has sufficient information to understand that the proposed Tam Valley, Almonte, and Manzanita Sites are inappropriate for inclusion in the 2023-2031 Housing Element Candidate Housing Sites Inventory. Not only would construction of housing on these sites exacerbate the already existing problems but doing so when the County admits in the Marin Countywide Plan EIR and 2012 Housing Element's FSEIR that significant adverse unavoidable impacts would result from such construction defies logic. Moreover, there can be no benefit that would override the impacts of environmental harm and severe illness, injury or loss of life from building on the Tam Valley, Almonte, and Manzanita Candidate Housing Sites, which are laden with environmental constraints and dangerous hazards. The best course of action would be for the County to revise the list to reflect the current problems with traffic, seismic activity, hazardous soil conditions, air and noise pollution, water supply, flooding, and impending sea level rise and to find that no new residential development in the Tam Junction & Manzanita areas is appropriate. Such action would be consistent with the Board of Supervisors' sensible decisions.	Email (See Email Comments Received.PDF, pp. 123-151)	X			X					X	X		X			X	
B - 160 Shoreline Highway (Almonte)	(Comment edited for length) Sustainable TamAlmonte has the following comments and recommendations regarding the merits of the above referenced Tam Valley, Almonte, and Manzanita Candidate Housing Sites listed in the 2023-2031 Housing Element DRAFT Candidate Housing Sites List. Due to the unique characteristics of the area, encouraging residential development, especially high-density development, at the above referenced Sites would increase the risk of undue harm to the environment and undue hardship, illness, injury and/or death to the current and future residents. The Tam Valley, Almonte, and Manzanita commercial lowlands, in which the above referenced sites are located, experience the most number of environmental constraints and hazards of any area in Unincorporated Marin. Both the Marin Countywide Plan's EIR and the 2012 Housing Element's SEIR demonstrate that development at these sites would exacerbate the existing dangerous conditions and add new significant adverse environmental impacts (which) magnifies the probability that a tragedy would ensue and the multiple mitigations that a developer would need to fulfill would cause development costs to soar. These factors make the sites unsuitable for affordable housing. The only acceptable course of action is to eliminate the sites from the inventory. Below is a list of the unique natural features, hazards, and limited resources in the Tam Valley, Almonte, and Manzanita lowlands that constrain development and population growth and substantiate our argument. For a quick overview of these constraints, please view the attached table. I. Dangerous Traffic with Unacceptable Level Of Service – LOS "F" Of Local Roadways:. II. Flooding, 100 Year Floodplain, Impending Sea Level Rise III. Filled Marsh Areas With High Seismic Activity, Liquefaction, Subsidence and Mud Displacement. IV. Air Quality & Noise: Increased Risk of Residents Developing Serious Illness Due to Living Near Major Roadways. V. Hazardous Materials: For additional information regarding potential health impacts to workers and future residents who may be exposed to hazardous soil conditions, related to past uses, in Tam Junction and Manzanita, please follow the below link to read the comment letter by Technical Expert Matt Hagemann. VI. Endangered Special Status Species. VII. Insufficient Services & Public Transit. VIII. Historic Wetlands and Baylands Corridor. IX. Historic Marshland That Could Be Restored. 160 Shoreline Hwy and 260 Redwood Hwy Frontage Rd. are historic marshland. X. High Density Development Is Not Consistent With the Traditional Character Of The Local Semi-Rural Communities. Conclusion: The County now has sufficient information to understand that the proposed Tam Valley, Almonte, and Manzanita Sites are inappropriate for inclusion in the 2023-2031 Housing Element Candidate Housing Sites Inventory. Not only would construction of housing on these sites exacerbate the already existing problems but doing so when the County admits in the Marin Countywide Plan EIR and 2012 Housing Element's FSEIR that significant adverse unavoidable impacts would result from such construction defies logic. Moreover, there can be no benefit that would override the impacts of environmental harm and severe illness, injury or loss of life from building on the Tam Valley, Almonte, and Manzanita Candidate Housing Sites, which are laden with environmental constraints and dangerous hazards. The best course of action would be for the County to revise the list to reflect the current problems with traffic, seismic activity, hazardous soil conditions, air and noise pollution, water supply, flooding, and impending sea level rise and to find that no new residential development in the Tam Junction & Manzanita areas is appropriate. Such action would be consistent with the Board of Supervisors' sensible decisions.	Email (See Email Comments Received.PDF, pp. 123-151)	X	X	X	X		X		X	X	X	X	X	X	X		

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B - 160 Shoreline Highway (Almonte)	As a concerned Mill Valley resident, I am writing to endorse TamAlmonte's letter to you re. the merits of Tam Valley, Almonte, & Manzanita Draft Candidate Housing Sites. Please think very carefully about sites, due to concerns about flooding, traffic and at times extreme fore danger with needed evacuation routes.	Email				X					X			X				
B - 160 Shoreline Highway (Almonte)	ATTACHMENT from Tam Design Review Board: Suggested Additional Policies to be Included in the Housing Element: 1. Wildfire Risk: Use mathematical modeling to investigate and predict wildfire risk. Prohibit the building of housing (even ADUs) in fire critical areas. 2. Flood Risk: Prohibit new housing in areas at risk of flooding from storm surge or sea level rise. 3. Bothin Marsh: Require all new development adjacent to Bothin Marsh to supplement and follow the policies that are designed to preserve the marsh. Given the County's recent efforts to restore and preserve the marsh, it makes no sense to select a site adjacent to the marsh for any form of dense development. 4. Evacuations: Require that new housing development along Shoreline Highway trigger a study and redesign of the traffic patterns to ensure that any new housing development in that area will not worsen traffic or increase the threat to life safety during an evacuation. Any assessment of traffic impacts of emergency evacuation should include new housing developments in the City of Mill Valley, as Shoreline Highway is the only exit should East Blithedale become blocked. 5. Short Term Rentals: Eliminate short-term rentals completely, or allow only on-site, owner-occupied properties to have short-term rentals. If someone does not live on-site, then the property is arguably an investment property only, and any claim of the need for that short-term rental income can be disregarded. This would enable ADUs to be counted toward the Housing Element numbers (see item #10). 6. Vacancies: Create a County mandated vacancy tax (as San Francisco is presently considering) to create disincentives for leaving housing units empty. Exemptions could be made for work from home or dwellings under a certain square footage if the homeowner works from home or needs the space for their own dwelling use. This has been documented to establish new housing units and therefore could be counted toward the housing numbers. 7. Speculative Investment: Eliminate corporate ownership of housing of up to 4 units. This will stop speculative over-bidding of properties (which drives up housing costs) and land banking (which is performed to drive up the value for the investors.) This is crucial for market rate units that do not have controls over ownership. If dwelling units are constructed and snatched up by corporate investors, the goal of increasing availability will not be achieved. If the housing crisis is still occurring after another eight years, the next round of RHNA numbers will be even higher, and even more density will be demanded. 8. Promote Affordability: Require that all lot splits and ADUs rent at affordable rates. This would enable ADUs to be counted toward the Housing Element numbers that are required for affordable units, which are the most difficult to achieve (see item #10). The Planning Department should not look at undersized parcels as a hardship that allows for an exemption to exceed the FAR. Instead, it should be taken as a limitation on the lot that will provide a smaller home, which will ultimately result in a diverse range of housing options and levels of affordability. 9. Conversions: Provide incentives to preserve the existing stock of affordable housing and/or promote the conversion of existing market rate housing to affordable housing. Tam Valley in particular has a large number of rental units which have traditionally been at the affordable end of the rental spectrum, and could readily be maintained as such with the necessary incentives. 10. Alternative Measures: Follow the Housing Element guidelines to promote and locate alternative housing sites as per recommended policies #5, 8, and 9 above. These guidelines state that acceptable dwelling unit numbers can be counted through "the availability of ADUs and JADUs for occupancy, rather than used as offices or guest houses." (p. 30) In addition: "Alternative adequate sites: Under limited circumstances, a local government may credit up to 25 percent of their adequate sites requirement per income category through existing units that will be: substantially rehabilitated in a multifamily rental or ownership housing complex of three or more units that are converted from non-affordable to affordable rental; preserved at levels affordable to low – or very low – income households, where the local government has provided those units with committed assistance." (p. 30)	Email																
B - 160 Shoreline Highway (Almonte)	I am writing to endorse the attached letter from Sustainable TamAlmonte to the Marin County Board of Supervisors and Planning Commission regarding the merits of the proposed Tam Valley, Almonte, and Manzanita Candidate Housing Sites listed in the 2023-2031 Marin County Housing Element DRAFT Candidate Housing Sites List. The need for housing our homeless is desperate but building residential space at Tam Junction is just NOT logical. The idea of building along Shoreling/ Highway 1 is very questionable. It is already a populated area with minimal sidewalks and access to needed resources. Thank you for your consideration of the attached letter	Email	X	X	X	X		X		X	X	X	X	X	X	X		

Location	Comment	Source	PCL	INF	SER	TRF	PRK	PTR	ACT	NMR	SEA	NAT	CUL	FIR	WAT	HLT	EQT	GDL
B - 160 Shoreline Highway (Almonte)	We are writing in regard to the sites chosen for possible inclusion into county plans for housing in the Almonte/Tam Valley area of the county. Of the eight sites mentioned in your Balancing Act scenario, five are in a serious flood zone and one is located, not on, but in Richardson's Bay. Your commentary regarding the avoidance of environmental hazards has been completely ignored by whatever staff was used to choose these sites. The properties in the flood zone are 160 Shoreline, assessor's parcel # 052-041-27, 217 Shoreline, 223 Shoreline, and 204 Flamingo Rd. he site which is actually in the bay is 260 Redwood Hwy. Oddly enough, there is one property across the road from 160 Shoreline which is on solid ground. That would be the Muir Woods Lodge, a motel which actually has some open space which could be used for more housing. Why was this property ignored when lesser properties were chosen? Considering that we are familiar with the sites in the Almonte/Tam Valley area but not the rest of the county, it seems very strange that your staff has chosen properties which flood now and will continue to flood even more in the future. We wonder about your motivation in focusing on dangerous and inappropriate land. We also wonder why your staff has chosen properties which are pretty much lumped together in the same area which will further exacerbate the level F traffic problems which occur for us every day. If these sites were chosen to be close to public transportation, we would remind you that there is no viable public transportation in our area. So we would be looking forward to much more daily auto traffic. We are extremely disappointed in the Balancing Act which appears to be a distraction and of no practical value. We wonder how much time and money was wasted on promoting this ridiculous game. We also wonder how many sites in the rest of the county are totally inappropriate but are being promoted as a way to choose our fate which, as you know, is not the case. Surely, the Board of Supervisors can do better than promoting this silly distraction rather than facing what is a serious problem for the future well being of Marin County.	Email				X		X			X							
B - 160 Shoreline Highway (Almonte)	We oppose new housing in the areas mentioned in Tam Junction due to flooding and traffic and possible fires, can't get out of here now. Tell Scott Wiener and his friends to move on.	Email				X					X			X				
B - 160 Shoreline Highway (Almonte)	Yesterday afternoon, I had the pleasure of speaking with Ms. Clark about the wisdom (actually, the lack of it) in the choice of potential sites around Tam Junction. Last night, I participated in the "roadshow" and, as a result, I am asking for your help in following up on one matter. During the presentation by Jose Rodriguez, he mentioned that one of the "Guiding Principles" for the BOS is the consideration of "environmental hazards". It doesn't take long to recognize the hazards of sea level rise, a long history of flooding and traffic in our neighborhood, among others. But, in addition, Mr. Rodriguez made an interesting rejoinder to a question about whether certain sites can be included in this study if such sites have been previously reviewed and rejected. He was not too clear but he suggested that the State of California has some "requirements" if a previously rejected site is again brought up for analysis. I asked him to specify (1) which of the four Tam Valley sites have already been considered and rejected, and (2) what are the state's requirements (if any)--that are different or additional--that would apply to such sites. He did not have the information available to answer either question and it didn't appear to me that there would be much of an effort to research those questions and disseminate the answers. Hence, this email. Do you know the answers? If not, would you please put in motion an effort to discover the answers? It may not be dispositive, but then again, it may be important.	Email				X					X	X						
Bon Air Shopping Center (Greenbrae)	you should add this is your list of housing element sites. This land could accommodate many units, it is very close to public transportation and have plenty of available parking.	Email																X
D - Los Ranchitos Road (Los Ranchitos)	(Comment edited for length) The homeowners and residents of Los Ranchitos (LR) strongly believe that re-zoning LR for denser housing in inappropriate and short-sighted and strongly oppose this change. As you prepare the Housing Element for 2023-30, please take the following into consideration: 1. Incorrect categorization of parcels as “underutilized residential.” As a neighborhood, and in terms of its past and current deeds, land use and zoning designations, LR is fully built out. LR was founded and developed on the basis of one (1) single family dwelling per parcel, with the minimum parcel size of 1 acre. For this reason alone, rezoning is undesirable to the property owners. There are few if any unbuilt lots, and the few that may exist are highly sloped properties up steep, one-lane streets, likely private roads maintained by the property owners themselves, not by the County. These are wholly inappropriate for multi- family development.2. Arbitrary categorization of parcels as “underutilized residential.” Not all the properties in LR are highlighted in the map. The assignment of properties as “underutilized residential" on the basis of property improvements is inconsistent and incorrect. Many properties that have been extensively remodeled are incorrectly designated as “underutilized.” Many properties that have not been remodeled are not designated as “underutilized,” when under the County’s own definition, they should be. These designations are arbitrary and inconsistent, and inconsistent with reality. 3. Incorrect Improvement-to-land ratios on property tax records. We disagree with the County’s assessment of LR properties as “underutilized residential” according to the definition presented. Properties in LR have been maintained and are being lived in and enjoyed mainly by owners in residence. The high land to improvements ratio most likely results less from remodeling than from continuous, long-term property ownership under Proposition 13. Since many properties have not changed hands in recent years or even decades, or are passed on from one generation to the next, their values have not been updated by recent market conditions and values. 4. Steeply sloped streets and properties. There would be issues with parking, fire safety, and most importantly, evacuation in the event of fire or other emergency. 5. Even if rezoning occurs, multi-family housing won’t actually be built. Our property owners are here because they enjoy and want to continue to enjoy the rural, spacious, and natural character of our neighborhood and our single-family homes on our minimum 1-acre properties. You can put numbers down on paper now, but unless developers force their way into the neighborhood onto a very few parcels, denser housing will not actually be built. It will not be sufficient to solve housing issues in Marin County or to satisfy the aims of RHNA for the county. 6. Rezoning will destroy the rural nature of LR. 7. Fire hazard in the Wildland Urban Interface (WUI). 8. Emergency Vehicle Entry, Evacuation and Egress. 9. Cumulative effects of additional housing at Northgate. The only way into and out of the LR neighborhood is LR Road. The addition of hundreds if not over a thousand (1,100) new units of housing at the Northgate mall site and in Terra Linda will greatly exacerbate traffic and gridlock under normal circumstances and create a huge potential for loss of life in the event of major emergencies like fires or earthquakes. 10. Loss of Agricultural zoning. 11. Water in Marin County. 12. Water in LR. 13. Lack of suburban infrastructure in LR. 14. Many ephemeral creeks divide properties into smaller portions. The presence of these watershed elements would greatly limit the amount of land that can be covered by additional housing as well as the location of where such housing that could be built. 15. Many utilities easements bisect properties. 16. LR is a wildlife corridor. We would be happy to host planner(s) in actually viewing and experiencing our neighborhood so they can come to understand just how inappropriate multi-family housing would be here. If you have any questions or would like more information about our neighborhood and our input to the Housing Element process, please don’t hesitate to contact us directly.	Email (See Email Comments Received.PDF, pp. 64-74)	X	X		X				X		X		X	X			

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D - Los Ranchitos Road (Los Ranchitos)	I am writing in response to the 2023-2030 Housing Element Proposals for the Los Ranchitos area of Marin County. The current proposal for approximately 139 additional units in Los Ranchitos does not consider the safety of residents and the impact on the natural environment. 1. Los Ranchitos is made up of lots on narrow hillside streets, without sidewalks and street lights. Adding more units will increase the difficulty of fighting fires on the upper streets or safely evacuating residents when earthquakes occur. 2. The only way in and out of Los Ranchitos is on Los Ranchitos Road. Traffic on Los Ranchitos Road becomes gridlock today when there is the slightest slowdown on Highway 101. I expect traffic will increase as the proposed housing units in the Northgate Mall are built. Adding more units in Los Ranchitos will make that even worse. 3. Where will the water come from for all of these proposed additional housing units, including the ones outside of Los Ranchitos? We are all reducing water usage to meet current water restrictions. I would think new sources of water should be identified and funded before large scale housing increases are proposed. 4. Los Ranchitos lots were created and deeded to be 1 acre minimum parcels. We are zoned light agricultural, resulting in many barnyard animals and backyard vegetable gardens. The rural nature of this area is what attracted me to this area and I am sure that is true for most of my neighbors. As I noted above, many of our streets are on steep hills. So to get 139 additional units in Los Ranchitos zoning will be changed to allow apartment-like buildings on the flatter streets. This will destroy the rural/wildlife feel to this neighborhood.	Email		X		X			X	X		X		X	X			
D - Los Ranchitos Road (Los Ranchitos)	I find it hard to believe that this many new housing units is even being considered! For the last three years we've been told that we can use only 60 gallons of water a day. And you want to add 1000 more houses in Los Ranchitos? Where does the water come from? Traffic is already insane, and this will add nothing but more gridlock.What about the fire hazards in densely populated areas? I find it absolutely insane that this could even be in anybody's minds. The people that live in this area chose it because of the zoning and the lot sizes. How can you just swoop in and say the "hell with you we're going to do what we want"? What happened to private property rights?	Email				X				X				X	X			
D - Los Ranchitos Road (Los Ranchitos)	I write to express my great objections to the proposed housing element to rezone Los Ranchitos in unincorporated Marin County. It is not well thought out and will have many negative consequences. First, the infrastructure of water, fire protection, education do not support this proposal. Due to the hilly properties and limited egress/ingress greater density will create a major fire liability and risk. Already, only one insurer will write policies for this neighborhood. Second, Los Ranchitos lots were created and deeded to be 1 acre minimum parcels for single family housing. Increasing density here will destroy the rural nature of our neighborhood. Third, Los Ranchitos is a Wildland Urban Interface (WUI). In addition to increased fire hazard, it will greatly affect the native animal habitats of turkeys, owls, deer, foxes and other animals. Fourth, The only way into and out of Los Ranchitos is Los Ranchitos Road. That road is already gridlocked during morning rush hours. The addition of more new housing units in Northgate and Terra Linda will greatly exacerbate traffic and gridlock under normal circumstances, and create a huge potential for loss of life in the event of major emergencies like fires and earthquakes. Adding housing to Los Ranchitos will only make a bad situation worse. Fifth, Los Ranchitos is currently zoned agricultural with numerous barnyard animals kept here. Increased density will adversely affect them as well. This housing element is not well thought out and will be detrimental to health and safety as outlined above. I urge that this plan not be adopted.	Email				X				X		X		X				

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D - Los Ranchitos Road (Los Ranchitos)	I write to express my objections to proposals in the County's Housing Element to rezone the Los Ranchitos area of unincorporated Marin County. While I acknowledge the need for additional housing, and generally support efforts to equitably provide for the good of the greater community, I believe that the proposal to rezone this particular area of the County is misguided. For one thing, the only way into and out of Los Ranchitos is Los Ranchitos Road. As things currently stand, Los Ranchitos is already a very congested road, used as the primary corridor through which people access the Northgate malls, Terra Linda High, Mark Day School and other points west of Highway 101 and in the valley between Central San Rafael and Lucas Valley. Los Ranchitos Road is already becoming a dangerous thoroughfare, particularly at the two Los Ranchitos Road/Circle Road intersections. The planned redevelopment of the Northgate Mall (up to 1,443 residential units, I understand?) is going to put even more pressure pressure on Los Ranchitos Road. The addition of another 80-139 more units in the Los Ranchitos neighbor is going to push things over the edge. Heavy traffic and gridlock will be normal circumstances - a nuisance on a daily basis, but a real safety hazard in the event of a significant emergency or disaster, such as an earthquake or fire. Further, as a Wildland Urban Interface (WUI) area, the Los Ranchitos area already poses a significant risk (so much so that at least one insurer that I'm aware of already refuses to provide coverage to residents of the area). With greater density between them and the only road out, all residents of Los Ranchitos, but particularly this in the hilly portions of the neighborhood (the majority of the current residents) will face a real and life threatening challenge should a wildfire or other disaster strike. Greater density in this WUI will also have an adverse, if not existential, impact on turkey, owl, deer, fox and other animal populations that call the area home. The plan to rezone Los Ranchitos seems to ignore the fact that the area lacks the infrastructure to support any additional development. There are no sidewalks, no streetlights, no access to recycled ("purpose pipe") water. The adequacy of other resources necessary to support additional density in the area (police, fire, schools, etc) also seems tenuous at best. How will these things be provided? Los Ranchitos is currently zoned agricultural. Many of us grow our own produce and as many have horses, goats and other barnyard animals. What are those residents to do and where will those animals go when modest farm homes are replaced with multi-family condos, duplexes, etc.? Los Ranchitos lots were created to be 1 acre minimum parcels for single family housing. The deeds to the lots in the neighborhood limit further development or subdivision. Increasing density here will destroy the nature and character of the neighborhood. It will take from the residents of the neighborhood that very thing which drew them to the neighborhood in the first instance, I realize this may not be the most compelling argument, but I do think its important to realize that what is being propose is not a plan to build something down the road from or adjacent to a residential neighborhood, but a complete and dramatic reconfiguration of the residential neighborhood itself. Finally, the proposal presumes the Los Ranchitos neighborhood is "not currently used to [its] full potential." I realize the lots in Los Ranchitos are larger than many, but does that really mean they are not used to their full potential? Seems like a pretty subjective assessment, unless "full potential" is really just another way of saying "capacity for density." If that's the case, I would posit that there are are a good many other areas of the county that could be made more dense without adversely impacting the quality of life of the persons who live in that area. This proposed Housing Element is ill considered and will be detrimental to health, safety and well being of the community. I am for more housing, but I urge the County to reconsider whether this is the best, or most appropriate place to put that housing.	Email		X	X	X			X			X		X	X			
D - Los Ranchitos Road (Los Ranchitos)	Like many Los Ranchitos residents my wife and I both feel very strongly that we do not think additional development in our agricultural neighborhood is wise. Denser housing will destroy the area, cause additional traffic, eliminate much of the animal friendly atmosphere and potentially be significantly difficult for fire engines and other ingress and egress. Please reconsider and hopefully leave our area the beautiful place that we love.	Email				X				X		X		X				
D - Los Ranchitos Road (Los Ranchitos)	Los Ranchitos Housing Element Sites: I would like to comment about the upcoming Housing Element environmental review. I do not believe that there is infrastructure regarding Safety Elements and Water supply. Our driveways is 8 feet wide up a steep knoll. It is not conducive to adding density housing. The past two years drought, is an indication that we do not have enough rain to sustain our community. If we are to add more housing it will increase water usage. What will happen to the community if the water is not available. Regarding the infrastructure, the roads will need to be addressed. The safety will be more dangerous for emergency vehicles if the roads are full of traffic on two lane roads. Thank you for considering my comments to the environmental review	Email		X		X								X	X			
E - 2 Jeannette Prandi Way (Lucas Valley)	(Comment edited for length) The Lucas Valley Homeowner's Association represents 538 homes in the special R-1:B-LV zoning track in Upper Lucas Valley. We, the Board of Directors of the LVHA, would like to give our support for the efforts to increase housing in Marin County, and offer the following input. To begin with, our State Governor's Housing Plan incentivizes housing in urban centers near transportation and services, to reduce reliance on vehicles and their carbon footprint. If the County chooses a path contrary to the State Plan, and not utilize State funding incentives for urban development, then we ask for a reevaluation of the housing sites identified for our Lucas Valley/Marinwood area. As outlined below, areas 1 - 3 are both contrary to the RHNA requirements and pose a danger for emergency evacuations. There are several sites identified as potential home building sites in our area. 1. Lucas Valley Road / Mt Muir Court 2. Juvenile Detention Center/Jeanette Prandi Way 3. 7 Mt Lassen 4. 530 Blackstone Dr 5. Marinwood Market area. We agree that the Marinwood Market area is a suitable site. It is close to freeway access and has sufficient infrastructure in place, including amenities like food and gas, and can easily absorb new development. Ironically, the relative quantity proposed/identified at this site is comparably less than the quantity for site #2 above, which is a much less suitable site as shown in following comments. There are several factors that make areas 1 - 3 only marginally suitable for new building sites, and therefore should, at best, be only allowed limited building. Factors include: High Wildfire Risk - Single Limited Evacuation Route. Water Shortages. Lack of Infill Infrastructure. Building Atop Unmarked Graves. Zoning Restrictions: The special zoning district for Upper Lucas Valley (R-1:B-LV) limits most buildings to a single story. The district was created in order to adhere to the architectural vision and design aesthetic of Joseph Eichler, a renowned architect highly influential in modern architecture. The existing low income senior living homes on Jeanette Prandi Way are likewise single story. If a housing development is allowed near the Juvenile Detention Center site, 7 Mt. Lassen, or Muir Court, they would have to be single story to maintain the character of the surrounding architectural landscape. This would limit the number of units allowed at these sites. Juvenile Detention Center: The concept of constructing multi-family housing at or adjacent to the Detention Center poses challenging logistical and feasibility issues. The County's attempts to reduce juvenile incarceration has been largely successful; however, not to the point where closure of the facility is possible. Marin County's criminal justice program continues to call for incarceration of violent youth offenders, and does not currently have an alternative detention facility. Consequently, any new housing at the Jeanette Prandi location would be adjacent to the Detention Center. It may be quite difficult to convince a developer to invest in a location where part of the "selling pitch" to residents is proximity to a detention center, particularly given that the facilities at Juvenile Hall are in major disrepair. Long History of Racial Parity. Among the factors the County is reviewing in selecting sites is historical discrimination. Our community has no such history and should not, therefore, be a priority for desegregation. Unlike many restrictive covenants in other neighborhoods in Marin County and across California, our CC&Rs have never contained language restricting homeownership based on race, creed, color or religion. Our community celebrates diversity, and we want to make clear we have no history of resisting it. Indeed, it has been reported by original LVHA members that our community attracted a large number of buyers of Asian descent as it was one of the few areas that they were not discriminated from buying into. Locating Housing Near Services and Transportation: The Board of Supervisors affirmed several principles for deciding potential Housing sites and distribution in 12/2021. The potential Housing sites listed for the Lucas Valley communities seem to ignore the mandate for locating housing near services and transportation. The Lucas Valley Community believes the County should be practical and realistic in identifying sites to satisfy the RHNA requirements that do not create a danger to existing communities, will actually serve the goals of the housing mandate, and that show homage to our beautiful and historically significant community. We respectfully request the County to rethink its "rural" VS "urban" housing development plans in light of the State's most recent Urban Housing strategy and funding incentives.	Email (See Email Comments Received.PDF, pp. 173-178)		X		X				X		X	X	X	X		X	
E - 2 Jeannette Prandi Way (Lucas Valley)	I am concerned since I never received this notice. I learned about it from one neighbor on Thursday 2/24. How were property owners in this area notified? How many homeowners have you contacted. I don't know any who has been notified except the neighbor that told me. Please give me the courtesy of a response. This is a lovely area but with many limitations & constraints for development – infrastructure limited ingress & egress on Lucas Valley Road schools etc. Additionally this is a WUI wildfire area. A recent minor fire caused limited area evacuations. I was evacuated and this small event caused alarming road congestion. In case of a more extensive fire it would be a disaster.	Email		X	X	X								X				

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E - 2 Jeannette Prandi Way (Lucas Valley)	I am writing to urge you NOT to approve the Marinwood/Lucas Valley sites under consideration to satisfy the Association of Bay Area Governments Regional Housing Needs Allocation Plan. Developments at these six sites (St. Vincent's School, Marinwood Market, 530 Blackstone Drive, 7 Mt. Lassen, 2 Jeannette Prandi Way, and Lucas Valley Road near Terra Linda Ridge) would result in more than 2300 housing units. While I know that some of the proposed housing is intended for teachers and other critical workers and for low income housing, both of which are important and necessary, it seems like too much development for the infrastructure of this small area. Additionally, all of these proposed development sites are within the Miller Creek School District boundaries and the unfunded impact of these developments on the District would be disastrous. Since the District is currently funded using a Basic Aid Model, it gets no per pupil funding. This means that all the additional students these developments generate will not result in additional funding for the District.	Email		X	X					X							X	
E - 2 Jeannette Prandi Way (Lucas Valley)	I found the online tools for commenting cumbersome and inscrutable, and much too time consuming to use. So, the following are my comments about specific housing allotment recommendations in Marinwood Lucas Valley.2 Jeannette Prandi Way (site of Juvenile Hall) - 254 100 or less Good location but too many units, must be affordable. Rotary Senior Housing is excellent. Perhaps expand affordable housing for seniors there with larger 2 BR units	Email															X	X
E - 2 Jeannette Prandi Way (Lucas Valley)	I see the maps and have concerns that things aren't matching. I'm not opposed to additional housing, but it should be done gradually and incrementally. I'm concerned about the number of units planned for Jeanette Prandi/Juvi of 254 units. That, I, believe, is WAY more than Rotary Village. It is one thing if it is planned as beautifully as Rotary Village with one-story facilities and have trees and landscaping. It is another thing if you build a 4 story building in the center of the meadow of Marin County Parks.	Email								X		X						
E - 2 Jeannette Prandi Way (Lucas Valley)	I'm taking this opportunity as a resident of Upper Lucas Valley in Marin to voice my views/concerns about the housing sites under consideration in my area: In general: I don't know what constitutes median vs low income, but in general I support add'l housing strategically placed and sensitively designed (to minimize negative impact on the environment and established communities) for essential workers such as school teachers, sheriff, police & fire dept and hospital staffers, many of whom currently commute long distances to work in the areas they serve. I'd like to see new homeowning opportunities (at below market rates) made available to these workers, as building more high-priced rental units serves no one but property owners.Sites under consideration in the Marinwood/Lucas Valley areas: St Vincent's School – 1800; Marinwood Market – 136. These are both logical, less problematic sites for development, as they are walkable to the GG bus stop at/near Miller Creek & Marinwood Aves, with quick, easy access to the 101 fwy. I really hope to see sensitive urban planning on the St. Vincents site, so the beautiful open space currently grazed by cows does not become yet another soulless jungle of buildings standing shoulder to shoulder facing the freeway. Speaking as someone who's actually rooting for the Smart Train to not only survive, but thrive: part of any development of these sites should include a bike path/paths to connect either or both to the Civic Center Smart station. And/or a shuttle bus (it's too long to walk for commuters).530 Blackstone Drive (site of religious house) – 32. I've no knowledge/opinion re: this site. 7 Mt Lassen (site of office park) – 58. 2 Jeannette Prandi Way (site of Juvenile Hall) – 254. My husband & I currently rent an office at 7 Mt. Lassen, so it's news to us that this site's under consideration. It's a beautiful, unique office setting that serves both the Upper and Lower Lucas Valley communities as a place of business to walk to! I'd hate to see that disappear!!! However, I wouldn't be adverse to seeing a portion of the current 7 Mt. Lassen structures converted to work/live spaces, if sensitively planned. Maybe 30%. My comments re: St. Vincents also apply to Jeannette Prandi Way. As long as new development is against the hills with access via Idylberry Rd, away from Lucas Valley Rd, and sensitively planned, I'm not totally adverse to new development. However the # of units proposed is too high!** Lucas Valley Rd/near terra Linda Ridge: 26. I don't know exactly where this is, but in principle I'm against it. **The problem with all new development close to Lucas Valley Rd is not merely degradation of the scenic route of LVR — but more importantly, adding traffic congestion to a wildfire interface area with a single ingress/egress. I'm an LVHA block captain, and was present and part of the fire evacuation on Sept 1st 2021... a learning experience. It's for this reason that I signed the petition against development in Lucas Valley. I believe that the current Northgate Mall could and should be a site for mixed-use development including low-to median income housing, yet is not on this list of proposed sites. It ticks all the boxes for access to transportation, schools, shopping, etc.	Email			X	X		X	X			X		X			X	X
E - 2 Jeannette Prandi Way (Lucas Valley)	my wife and I are long time residents of Lucas Valley and most every day we visit and walk in the delightful redwood lined area in front of Juvi. It is with shock and utter disappointment that I see that this site is being considered for additional apartment housing. In case u have not noticed the traffic on Lucas Valley road is already quite bad especially when inevitably get stopped at the new light on Los Gamos. If this new housing is approved the addl vehicles on the road will be intolerable.. Each new resident will need a car as there is NO reliable public transportation. Would make more sense to be built much closer to hwy 101.. Please do NOT approve this thoughtless proposal	Email				X		X				X						
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E - 2 Jeannette Prandi Way (Lucas Valley)	Thank you for taking time to read over my thoughts on the new housing developments proposed for Jeanette Prandi Way, Mount Muir Court, Marinwood Plaza and 7 Lassen. As a Marin County native of 58 years and a Lucas valley resident of 26 years, I am surprised that these projects are so close to approval without adequate community outreach and input. There are many items of concern that I don't feel have been adequately answered for me to support these developments. At this time I am strongly opposed to these developments. I am respectfully requesting more time for our community to better understand these proposals and how we can collaboratively help the County solve its low income housing challenges.	Email																
E - 2 Jeannette Prandi Way (Lucas Valley)	This letter is in regards to the proposed site and distribution of housing in the Lucas Valley/Marinwood area. While I feel this area can support some expansion, the amount proposed by the county is overwhelming. Per the board of supervisors principles, please note my feedback below. 1: Ensure Countywide Distribution: The majority of housing in unincorporated Marin County is being distributed to Marinwood/LUCAS VALLEY. This does not appear to be an equitable distribution and will potentially double the population of this area, affecting all services- sheriff, fire, schools, traffic, etc. Marinwood/LUCAS VALLEY area is being considered for a majority of this housing in unincorporated Marin: St Vincents: 1800 Marinwood Market: 136 Blackstone (site of religious house): 32 Mt Lassen/deli: 58 Jeanette Prandi/Juvi: 254 Lucas Valley Rd/near terra Linda Ridge: 26 Total: 2306. (This could be up to 60% of the total housing for unincorporated Marin) Households in Marinwood/LUCAS VALLEY currently 2412. (This could potentially double our size)	Email			X	X	X					X				X				
E - 2 Jeannette Prandi Way (Lucas Valley)	This letter is in regards to the proposed site and distribution of housing in the Lucas Valley/Marinwood area. While I feel this area can support some expansion, the amount proposed by the county is overwhelming. Per the board of supervisors principles, please note my feedback below. 1: Ensure Countywide Distribution: The majority of housing in unincorporated Marin County is being distributed to Marinwood/LUCAS VALLEY. This does not appear to be an equitable distribution and will potentially double the population of this area, affecting all services- sheriff, fire, schools, traffic, etc. Marinwood/LUCAS VALLEY area is being considered for a majority of this housing in unincorporated Marin: St Vincents: 1800 Marinwood Market: 136 Blackstone (site of religious house): 32 Mt Lassen/deli: 58 Jeanette Prandi/Juvi: 254 Lucas Valley Rd/near terra Linda Ridge: 26 Total: 2306. (This could be up to 60% of the total housing for unincorporated Marin) Households in Marinwood/LUCAS VALLEY currently 2412. (This could potentially double our size)	Email			X	X	X					X				X				
E - 2 Jeannette Prandi Way (Lucas Valley)	This letter is in regards to the proposed site and distribution of housing in the Lucas Valley/Marinwood area. While I feel this area can support some expansion, the amount proposed by the county is overwhelming. Per the board of supervisors principles, please note my feedback below.3: Encourage Infill and Redevelopment Opportunities; Juvi/Jeanette Prandi currently has low income senior housing. An expansion of this senior housing would be good use of this area and needed in the community. Multistory housing/254 units on this small property does not fit in with this area of single family homes and the surrounding openspace and can not be supported by current transportation structure and schools.	Email			X	X	X					X							X	

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E - 2 Jeannette Prandi Way (Lucas Valley)	We have seen the preliminary list of potential housing sites for Marin County, including in unincorporated areas such as Marinwood/Lucas Valley, as developed by the ABAG (Regional Housing Needs Allocation Plan), and approved by the California Department of Housing and Community Development. The plan includes 2,412 units within the Lucas Valley / Marinwood area (accounting for 68% of the 3,569 units within unincorporated Marin County). Sites under consideration in the Marinwood / Lucas Valley areas: St Vincent's School - 1,800; Marinwood Market – 136; 530 Blackstone Drive (site of religious house) - 32 7; Mt Lassen (site of office park) – 58; 2 Jeannette Prandi Way (site of Juvenile Hall); 254 LucasValley Rd/near terra Linda Ridge: 26. We are not opposed to some moderate increase of housing units in the area. However, we have some serious concerns regarding these potential sites: (1) The Lucas Valley / Marinwood area currently has less than roughly 1,750 homes, spread across a roughly 3.5 mile valley corridor, almost all of which are single family dwellings, and the overwhelming majority of which are one or two story homes. There are no large multi-unit apartment buildings in this area. The overall magnitude of the increase in units in this area (2,412 units) is disproportionately large compared to the current housing density of the area. The proposed increase would more than double the overall number of housing units in the area. (2) The area to the south and west of St. Vincent's School (east of HWY 101) has been discussed as a potential development site for some time. Although multi-unit housing could easily be developed there, adding 1,800 units would completely overwhelm the property and this very large number of additional units represents an enormous growth for the area, on the same order of units as currently exist in all of Lucas Valley / Marinwood. To fit this large number of units, the development would likely include large three (or more) story structures, which do not currently exist anywhere in this area. (3) The site at 530 Blackstone Drive (current site of religious house) could easily fit a multi-unit development, however 32 units on this site is far too large for the size of the property, which is near the end of a small half-mile residential street, that currently has less than 50 total housing units. (4) The site at 7 Mt. Lassen Drive (currently two relatively small two-story office buildings) is far too small to fit 58 housing units without the new structure extending to three or more stories. (5) The site at 2 Jeannette Prandi Way (south of the Juvenile Hall) is currently an open space area with a loop path that is regularly used by nearby residents (including residents of the nearby senior housing development) as a recreational walking, bike riding, etc. area (and dog walking area). This open space area has been in existence for well over thirty years and is a very popular area regularly used by many residents of the adjoining neighborhoods. A potential development consisting of 254 units on this site would completely eliminate a treasured and much-used open space area and would likely require a multi-story (three or more stories) structure. Very few of the homes in this area of Lucas Valley / Marinwood are more than one story (almost all are one-story Eichler homes). Such a large development is completely out of character with the current land use in this area and should absolutely not be allowed to be developed on this site. (6) These potential new housing units would represent an extremely large additional burden to traffic density in the area. (7) These potential new housing units would overwhelm the current capacity at our three elementary schools and one middle school. (8) These potential new housing units would create a very large additional demand for water resources in the Lucas Valley / Marinwood area which are currently very limited. The simple number (2,412) of potential additional housing units in the Lucas Valley / Marinwood area is much too large and would represent an approximate doubling of the current housing density in the area. Each of the proposed developments presents issues regarding the size of new structures (including constructing multi-story structures in areas where there are currently none), and would present issues concerning current resource capacities (including traffic, schools, and water). Thank you for your consideration of these issues when making decisions regarding potential new housing developments in the Lucas Valley / Marinwood area.	Email			X	X				X		X			X			
E - 2 Jeannette Prandi Way (Lucas Valley)	With respect to the Lucas Valley sites being considered as potential housing sites, I submit the following comments: Juvenile Hall Site Master Plan (A copy of the Master Plan and Appendix will be presented to the Board of Supervisors at the March 2, 2021 meeting.): A Master Plan was developed through collaboration of Marin County Supervisor Bob Roumiguiere, Planning Director Mark Reisenfeld, and Lucas Valley Community members. The Master Plan was submitted to the Board of Supervisors and adopted in 1994. The Plan encompasses the Jeanette Prandi and Juvenile Hall sites being considered as housing sites. The Master Plan provides: a. Upper Idylberry Corridor - The plan stipulates the area north of the Idylberry is transferred to the Open Space District, and there shall be no structures or other improvements north of the Idylberry Corridor. b. Lower SE portion of the Juvenile Hall Site - the lower grass area is preserved for recreational uses. c. SW corner of the site (Jeanette Prandi Way) - shall remain as County Administrative and Storage Facilities only. d. Rotary Senior Housing (Jeanette Prandi Way) - shall be limited to 55 units, single story only. e. Juvenile Hall and County Parks Offices - area shall remain as County facilities. No additional development is permitted. The restrictions of the Master Plan prohibit consideration of this entire area for possible housing sites. In addition, all of the Lucas Valley sites are in the wildland urban interface (WUI) zones that contradict Governor Newson's priorities to shift housing away from rural wildfire-prone areas and closer to urban centers.	Email								X		X		X				

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G - 155 Marinwood Avenue (Marinwood)	(Comment edited for length) The Lucas Valley Homeowner's Association represents 538 homes in the special R-1:B-LV zoning track in Upper Lucas Valley. We, the Board of Directors of the LVHA, would like to give our support for the efforts to increase housing in Marin County, and offer the following input. To begin with, our State Governor's Housing Plan incentivizes housing in urban centers near transportation and services, to reduce reliance on vehicles and their carbon footprint. If the County chooses a path contrary to the State Plan, and not utilize State funding incentives for urban development, then we ask for a reevaluation of the housing sites identified for our Lucas Valley/Marinwood area. As outlined below, areas 1 - 3 are both contrary to the RHNA requirements and pose a danger for emergency evacuations. There are several sites identified as potential home building sites in our area. 1. Lucas Valley Road / Mt Muir Court 2. Juvenile Detention Center/Jeanette Prandi Way 3. 7 Mt Lassen 4. 530 Blackstone Dr 5. Marinwood Market area. We agree that the Marinwood Market area is a suitable site. It is close to freeway access and has sufficient infrastructure in place, including amenities like food and gas, and can easily absorb new development. Ironically, the relative quantity proposed/identified at this site is comparably less than the quantity for site #2 above, which is a much less suitable site as shown in following comments. There are several factors that make areas 1 - 3 only marginally suitable for new building sites, and therefore should, at best, be only allowed limited building. Factors include: High Wildfire Risk - Single Limited Evacuation Route. Water Shortages. Lack of Infill Infrastructure. Building Atop Unmarked Graves. Zoning Restrictions: The special zoning district for Upper Lucas Valley (R-1:B-LV) limits most buildings to a single story. The district was created in order to adhere to the architectural vision and design aesthetic of Joseph Eichler, a renowned architect highly influential in modern architecture. The existing low income senior living homes on Jeanette Prandi Way are likewise single story. If a housing development is allowed near the Juvenile Detention Center site, 7 Mt. Lassen, or Muir Court, they would have to be single story to maintain the character of the surrounding architectural landscape. This would limit the number of units allowed at these sites. Juvenile Detention Center: The concept of constructing multi-family housing at or adjacent to the Detention Center poses challenging logistical and feasibility issues. The County's attempts to reduce juvenile incarceration has been largely successful; however, not to the point where closure of the facility is possible. Marin County's criminal justice program continues to call for incarceration of violent youth offenders, and does not currently have an alternative detention facility. Consequently, any new housing at the Jeanette Prandi location would be adjacent to the Detention Center. It may be quite difficult to convince a developer to invest in a location where part of the "selling pitch" to residents is proximity to a detention center, particularly given that the facilities at Juvenile Hall are in major disrepair. Long History of Racial Parity. Among the factors the County is reviewing in selecting sites is historical discrimination. Our community has no such history and should not, therefore, be a priority for desegregation. Unlike many restrictive covenants in other neighborhoods in Marin County and across California, our CC&Rs have never contained language restricting homeownership based on race, creed, color or religion. Our community celebrates diversity, and we want to make clear we have no history of resisting it. Indeed, it has been reported by original LVHA members that our community attracted a large number of buyers of Asian descent as it was one of the few areas that they were not discriminated from buying into. Locating Housing Near Services and Transportation: The Board of Supervisors affirmed several principles for deciding potential Housing sites and distribution in 12/2021. The potential Housing sites listed for the Lucas Valley communities seem to ignore the mandate for locating housing near services and transportation. The Lucas Valley Community believes the County should be practical and realistic in identifying sites to satisfy the RHNA requirements that do not create a danger to existing communities, will actually serve the goals of the housing mandate, and that show homage to our beautiful and historically significant community. We respectfully request the County to rethink its "rural" VS "urban" housing development plans in light of the State's most recent Urban Housing strategy and funding incentives.	Email (See Email Comments Received.PDF, pp. 173-178)												X					X
G - 155 Marinwood Avenue (Marinwood)	I am writing to urge you NOT to approve the Marinwood/Lucas Valley sites under consideration to satisfy the Association of Bay Area Governments Regional Housing Needs Allocation Plan. Developments at these six sites (St. Vincent's School, Marinwood Market, 530 Blackstone Drive, 7 Mt. Lassen, 2 Jeannette Prandi Way, and Lucas Valley Road near Terra Linda Ridge) would result in more than 2300 housing units. While I know that some of the proposed housing is intended for teachers and other critical workers and for low income housing, both of which are important and necessary, it seems like too much development for the infrastructure of this small area. Additionally, all of these proposed development sites are within the Miller Creek School District boundaries and the unfunded impact of these developments on the District would be disastrous. Since the District is currently funded using a Basic Aid Model, it gets no per pupil funding. This means that all the additional students these developments generate will not result in additional funding for the District.	Email		X	X					X								X	
G - 155 Marinwood Avenue (Marinwood)	I found the online tools for commenting cumbersome and inscrutable, and much too time consuming to use. So, the following are my comments about specific housing allotment recommendations in Marinwood Lucas Valley. Marinwood Market - 136 100 or less: Best and necessary site for redevelopment, but it should be a mixed use development as was proposed by Bridge Housing some years ago. Housing number should be reduced to under 100	Email								X								
G - 155 Marinwood Avenue (Marinwood)	I hope that the Marinwood Plaza/market site is again under consideration for housing. As you most likely know, some 15 years or so ago, the community shot down an excellent proposal from Bridge Housing. Except for the market, the property remains a derelict eyesore. Many of us in Marinwood would like to see the property improved, including a modest amount of housing development, along with community amenities such as a coffee shop, brew pub, or other gathering place, and other shops such as hair salon, co-working space, etc. It is close to public transportation, schools, and major employers most notably Kaiser. It's a far superior site for development than the St Vincents property which has myriad sea level rise and other environmental challenges, and very little other infrastructure. I hope the property will be on be on tomorrow's meeting agenda.	Email																X
G - 155 Marinwood Avenue (Marinwood)	I see the maps and have concerns that things aren't matching. Then two of the sites are still contaminated from the former cleaners at Marinwood Market Plaza - St. Vincent's and Marinwood Market Plaza. So what happens with the housing planned in these locations?1936 units?	Email														X		
G - 155 Marinwood Avenue (Marinwood)	I'm taking this opportunity as a resident of Upper Lucas Valley in Marin to voice my views/concerns about the housing sites under consideration in my area: In general: I don't know what constitutes median vs low income, but in general I support add'l housing strategically placed and sensitively designed (to minimize negative impact on the environment and established communities) for essential workers such as school teachers, sheriff, police & fire dept and hospital staffers, many of whom currently commute long distances to work in the areas they serve. I'd like to see new homeowning opportunities (at below market rates) made available to these workers, as building more high-priced rental units serves no one but property owners.Sites under consideration in the Marinwood/Lucas Valley areas: St Vincent's School – 1800; Marinwood Market – 136. These are both logical, less problematic sites for development, as they are walkable to the GG bus stop at/near Miller Creek & Marinwood Aves, with quick, easy access to the 101 fwy. I really hope to see sensitive urban planning on the St. Vincents site, so the beautiful open space currently grazed by cows does not become yet another soulless jungle of buildings standing shoulder to shoulder facing the freeway. Speaking as someone who's actually rooting for the Smart Train to not only survive, but thrive: part of any development of these sites should include a bike path/paths to connect either or both to the Civic Center Smart station. And/or a shuttle bus (it's too long to walk for commuters).530 Blackstone Drive (site of religious house) – 32. I've no knowledge/opinion re: this site. 7 Mt Lassen (site of office park) – 58. 2 Jeannette Prandi Way (site of Juvenile Hall) – 254. My husband & I currently rent an office at 7 Mt. Lassen, so it's news to us that this site's under consideration. It's a beautiful, unique office setting that serves both the Upper and Lower Lucas Valley communities as a place of business to walk to! I'd hate to see that disappear!!! However, I wouldn't be adverse to seeing a portion of the current 7 Mt. Lassen structures converted to work/live spaces, if sensitively planned. Maybe 30%. My comments re: St. Vincents also apply to Jeannette Prandi Way. As long as new development is against the hills with access via Idylberry Rd, away from Lucas Valley Rd, and sensitively planned, I'm not totally adverse to new development. However the # of units proposed is too high!** Lucas Valley Rd/near terra Linda Ridge: 26. I don't know exactly where this is, but in principle I'm against it. **The problem with all new development close to Lucas Valley Rd is not merely degradation of the scenic route of LVR — but more importantly, adding traffic congestion to a wildfire interface area with a single ingress/egress. I'm an LVHA block captain, and was present and part of the fire evacuation on Sept 1st 2021... a learning experience. It's for this reason that I signed the petition against development in Lucas Valley. I believe that the current Northgate Mall could and should be a site for mixed-use development including low-to median income housing, yet is not on this list of proposed sites. It ticks all the boxes for access to transportation, schools, shopping, etc.	Email			X	X		X	X		X		X		X			X	X

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G - 155 Marinwood Avenue (Marinwood)	Thank you for taking time to read over my thoughts on the new housing developments proposed for Jeanette Prandi Way, Mount Muir Court, Marinwood Plaza and 7 Lassen. As a Marin County native of 58 years and a Lucas valley resident of 26 years, I am surprised that these projects are so close to approval without adequate community outreach and input. There are many items of concern that I don't feel have been adequately answered for me to support these developments. At this time I am strongly opposed to these developments. I am respectfully requesting more time for our community to better understand these proposals and how we can collaboratively help the County solve its low income housing challenges.	Email																
G - 155 Marinwood Avenue (Marinwood)	The 2022 Marin County Candidates site for Unincorporated Marin and especially Marinwood/ Lucas Valley/Silveria Ranch is absurd. It targets just 5 square miles with 80% of the housing allocation for affordable housing in one community WITHOUT essential planning for schools, roads, government services, water, sewer and other essential services. Why "plan to fail"? Shouldn't a good faith effort to build affordable housing in our community also include a comprehensive plan for accommodating growth? It doesn't. This is why it should be rejected today. Instead, let's address the core questions for growth AND the financial impact of adding massive amount of largely non profit housing to a single community WITHOUT ADDITIONAL TAX BASE. Marinwood/Lucas Valley currently has approximately 2700 housing units for 6000 residents. The proposed housing sites could add 2300 apartments and 5500 residents who ALL WILL NEED schools, water, government services, transportation, access to shopping, etc. Shouldn't a proper plan for growth precede approval for housing? One of the sites listed is Marinwood Plaza, our communities ONLY commercial plaza within walking distance for thousands of residents. If the plan for 160 units is approved, this would squeeze out a vital community center to the detriment of all. This is not including the problem of TOXIC WASTE contamination clean up suitable for residential dwelling is a long way off despite community pressure on the Regional Water Quality Control Board who will not enforce its own clean up orders on the current owners. Despite the harsh criticism of the RHNA process, I believe there is a real community desire for more affordable housing in a community that will be planned appropriately, won't redevelop our neighborhoods and utilize open spaces like Silveira Ranch, St Vincents and other sites. While everyone I know supports the idea of more housing, not a single one wants a poorly conceived plan that forces large housing projects without considering the impacts. Reject the current RHNA plan until a comprehensive community plan with real public input can be drafted. PS. The "Balancing Act" tool is NOT a serious tool for community input. Less than 25% of the homes under consideration were ever included in the database. I do not find "our database could not handle the data" as a credible reason from the Community Development Department. If you want REAL success seek REAL community support.	Email		X	X					X		X				X		
G - 155 Marinwood Avenue (Marinwood)	This letter is in regards to the proposed site and distribution of housing in the Lucas Valley/Marinwood area. While I feel this area can support some expansion, the amount proposed by the county is overwhelming. Per the board of supervisors principles, please note my feedback below. 1: Ensure Countywide Distribution: The majority of housing in unincorporated Marin County is being distributed to Marinwood/LUCAS VALLEY. This does not appear to be an equitable distribution and will potentially double the population of this area, affecting all services- sheriff, fire, schools, traffic, etc. Marinwood/LUCAS VALLEY area is being considered for a majority of this housing in unincorporated Marin: St Vincents: 1800 Marinwood Market: 136 Blackstone (site of religious house): 32 Mt Lassen/deli: 58 Jeanette Prandi/Juvi: 254 Lucas Valley Rd/near terra Linda Ridge: 26 Total: 2306. (This could be up to 60% of the total housing for unincorporated Marin) Households in Marinwood/LUCAS VALLEY currently 2412. (This could potentially double our size)	Email		X	X	X				X				X				
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G - 155 Marinwood Avenue (Marinwood)	While I am generally in favor of additional low-income housing in Marin, it appears that the proposals for development of Marinwood Avenue turn that are of our neighborhoods (I live across the street) into an area that exclusively low-income housing. Experiments with consolidating low- income housing in the 1960-80's proved to us that this does not work well. These areas become neglected bygovernment and residents alike. Is it possible to make these development more diverse?	Email															X	
H - 1565 Vendola Drive (Santa Venetia)	Hello and thank you for the opportunity to comment regarding Future Housing Sites in Marin County. I attended the local Housing meeting regarding Santa Venetia and Los Ranchitos on February 15th and live in the Santa Venetia area. Here are my comments from a Santa Venetia resident perspective: 1. The process, while advised by the Marin County Planning Department, is being run by a consulting agency that is not familiar with Marin County and the local areas & neighborhoods. 2. The number of assigned housing units to Santa Venetia, 422, ignores the following. Before housing site numbers are assigned and accepted, a "CEQA-lite" analysis should be performed to determine if the numbers and locations are practical from a CEQA perspective. We heard these concerns brushed off with the response that if any development is going to be done, a full CEQA would be completed before development could/would proceed. This would be an "after-the-fact" process, with the fact that the housing numbers and sites have already been assigned and accepted, and would be too late to be influential in the development process. a. There is only one practical vehicle road out of Santa Venetia to the freeway that is already heavily impacted by three schools, the one at the JCC, the Marin School, and Venetia Valley school, and a large pre-school. Traffic in & out of Santa Venetia is also already heavily impacted by the JCC, the Civic Center traffic, the Marin Lagoon traffic, the Veterans Memorial traffic, the Marin Lagoon Housing and the commercial enterprises along McInnis Parkway. b. Some of the sites selected are in wetlands areas, such as the McPhail school site next to North San Pedro Road. c. some of the sites selected are next to the Bay and subject to special development restrictions, such as the McPhail school site. d. The total number of housing units assigned to Marin County, and not just to the unincorporated areas, does not take into account the water needs. And we, Marin County as serviced by MMWD, are in the middle of a water shortage with future years looking to be worse due to Climate Change. 3. Using city limit boundaries to direct neighborhood focus and comment ignores the reality of the holistic nature of a neighborhood that crosses city limits and unincorporated boundaries. It is expedient, especially for an outside consulting firm not familiar with Marin County or Santa Venetia, but not realistic. This is especially true for the Santa Venetia area. Santa Venetia is heavily impacted by what the City of San Rafael does or does not due around the Civic Center, at the intersection of North San Pedro Road and Civic Center Drive, around Marin Lagoon Park, at the Marin Lagoon homes neighborhood, and at the Marin Ranch Airport. Using city limit boundaries is expedient but not accurate and realistic in appraising housing impacts to a neighborhood such as Santa Venetia. And restricting the geographical area that Santa Venetia residents can comment on and have input to, to not include what is inside the City limits of San Rafael for the areas noted above is violating our rights to comment on and have input to what is impacting our neighborhood. Thank you for the chance to comment	Email				X				X				X	X			
H - 1565 Vendola Drive (Santa Venetia)	Here in Santa Venetia, we are living with water shortages, traffic congestion, and our community's evacuation route was named the most dangerous in Marin and yet huge additional numbers of housing are proposed for this flood prone neighborhood. That's insane! We are not fooled by claims that these new residents won't drive everywhere. They will. We already know that every person of driving age in our neighborhood not only drives but owns a car, or truck. They line our streets, further restricting access routes. There are sites where housing can happen like at Northgate Mall, but not in our overcrowded flood zone.	Email				X				X	X			X				
H - 1565 Vendola Drive (Santa Venetia)	Hi, I would like to object to 251 N San Pedro as a site to build housing. There is a Child Center there serving many families. The ball field on the property is used by the children at the school and people in the neighborhood. There are very few ball fields for Little League. This ball field should not be taken away from ball players. I live in the condo complex next door. Parking is already limited for residents and guests. We can't absorb all the people people who would live there who have more cars then the give spots for them and their guests. If housing needs to be built in Santa Venetia why not 1565 Vendola Dr? The school property there has not been used for decades.	Email																X
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H - 1565 Vendola Drive (Santa Venetia)	I am against the proposed units on North San Pedro Road. This proposed project is completely unsustainable and not researched for undesirable living situations. There are many factors that indicate this would not be a good site to build. Factors such as flood control, sea rising at a rate we can expect in the coming years, congestion, removal of a ball park and mostly there are no services to support this project. Well thought out projects include parks, services, bike paths, sidewalks and a reasonable egress in case of fire. North San Pedro Road is all ready congested due to a large school and many churches on this road. Another road to San Rafael is available to Point San Pedro Road however this road is failing due to floods in the winter and very evident sink holes that are not being addressed. More traffic would of course erode the roads further and in the past have had slides on this road particularly after recent tree removal has increased the likely occurance.	Email		X	X	X				X	X	X		X				
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H - 1565 Vendola Drive (Santa Venetia)	I served on the Santa Venetia Community Plan (SVCP) Committee for almost 10 years, including working with County Staff the last 4 years, until its final adoption in 2017. This process included a thorough survey of our neighbors who commented on every empty parcel and open space for future development (and in fact Godbe told us the response was overwhelming with a higher than normal percentage of participation). Our SVCP Committee Members represented every corner of Santa Venetia. We held community meetings (that were well-attended) so all residents had a chance to voice their opinions and ideas. No one knows Santa Venetia better than Santa Venetians. The plan was supposed to cover everything of interest to ensure a diverse, family-oriented, and happy community for years to come. Adding 442 units is simply untenable for a small, working-class hamlet such as Santa Venetia. The last two open spaces (two ball fields) are slated for high density housing. This is totally uncharacteristic of the surrounding neighbors who live in small, single- family housing. In the February 15th Housing Element Zoom call, with County Staff and Contractors from… who knows where?, we were informed that our Community Plan would need to be updated. Who would do this work? When and how soon would these updates happen? How can the County randomly update our Community Plans that we spent so many resources on. SB-9 and SB-10 are a complete contradiction to our Community Plan that we dedicated years of work and volunteer hours to finally see its adoption. These past summers, we've stayed inside due to smoke and/or triple-digit weather. We used a bucket from our shower to water our indoor and deck plants while our yard withered and died due to restrictions and requirements in place from Marin Water. We worked out evacuation routes to alert residents to escape danger due to our one road in and out of Santa Venetia. I heard chain saws, chippers, and weed whackers almost every day, regardless of the high, fire-danger days. This is due to San Rafael Fire Department notifications and requirements. Also, there is currently a plan in place for creekside residents to have their wooden levees raised two feet to protect the sinking, below-sea-level homes in the flood zone (Zone 7), due to Sea Level Rise. The CDA is currently working on a "Safety Overlay Map" to be completed after the Housing Element site are chosen. Isn't this a case of "putting the cart before the horse"? Due to the location of Santa Venetia, nestled before the ripe, fire-prone area of San Pedro Ridge and the rising Las Gallinas Creek, doesn't this deserve a second look and/or consideration of the over-inflated number of units allotted to our small hamlet. When talking to my neighbors, the 422 units sounds so incredulous, they find it impossible to believe. As a volunteer, seasoned Land Use Member, I can't say I blame them. It's mind-boggling. Please reconsider Santa Venetia's allotted housing site numbers.	Email									X			X	X			
H - 1565 Vendola Drive (Santa Venetia)	I will reiterate the comments I made at the February 15 Housing Element meeting… I've lived in SV for over 30 years. I've served on the Santa Venetia Neighborhood Association Board of Directors for almost 30 years. Through our neighborhood association, The Santa Venetia Neighborhood Association (SVNA), we try to get the word out so that our residents are aware of upcoming projects and opportunity to comment. We've heard from Santa Venetia residents that they want to protect our quality of life. We are already concerned about the constant fire danger, flooding, Sea Level Rise, ingress and egress, and unsafe evacuation routes. Climate change is a huge concern for us and as well, we have run out of water in Marin County and are under strict mandates, so I can't understand how adding more and more housing units will help. And to restate, 422 units in SV is an increase of almost 25% of the 1,700-1,800 units we currently had, at last count. It's a very shocking number of additional units for us. I grew up in San Rafael. I hate what they've done to the City and have been constantly disappointed with the building choices and what they have given up. I don't want to see that happening in Santa Venetia – more congestion and loss of our green spaces. Affordable housing sounds great on paper, but we never seem to get that promise fulfilled. I've followed projects in San Rafael and for almost every project, the promise is a huge amount of housing with a small portion designated affordable and then after the project passes through the hurdles, the affordable-housing number is adjusted… always downward. I remember previously rules were passed to keep up with the demand of affordable housing, but the goalposts seem to constantly change and that number is lowered. What is the promise that won't happen with this process? Also, I heard them say at that meeting, they were giving schools and churches more flexibility by allowing them to build on parking lots? If that is the case, where will people park? They've already lowered the parking needed for new building in our communities. We already have overblown congestion, car-to-car parking along the road, and lots of red curbs. The idea of reducing parking requirements for new units AND building on parking required for old units is frightening. And finally, I realize this mandate for housing comes from the state. I believe we (my neighbors) are all on the same page when I ask that you push-back against these mandates. These are not only unrealistic for Santa Venetia but for all of Marin, the wonderful county I grew up in.	Email								X	X	X		X	X		X	

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I - 251 N San Pedro Road (Santa Venetia)	(Comment edited for length) As the directors of Marin Cove Homeowner's Association, and on behalf of the Association, we register our strong objections to plans to turn the Old Gallinas school site into a housing complex. The Marin Cove subdivision is in the Santa Venetia neighborhood. It has 75 units, on single lane streets, and has limited parking areas. The owners are generally single families; some of which have children. The owners, in part due to the limited public transportation, generally use cars to get to and from work. Marin Cove HOA, not the school district, owns the strip of land on the west side of Schmidt Lane separating the field at the Old Gallinas School District from Schmidt Lane. The HOA does not consent to the use of its property to provide access for proposed housing. To the extent the driveway on Schmidt Lane, which crosses the strip of property owned by the Marin Cove HOA, is claimed to be an easement to permit access to the field, if the proposed housing development contemplates the use of such driveway, such is a dramatically increased use of the easement. We do not consent to the use of the driveway to serve a 180- unit development. For the reasons discussed below, we request the removal of the Old Gallinas property from the list of sites proposed for affordable housing. We make these objections based on Government Code section 65852.21 of the Housing Crisis Act ("HCA"), which provides for denial of a proposed housing development project if such project would have a "specific, adverse environmental and social impact," as defined and determined in paragraph (2) of subdivision (d) of Government Code section 65589.5. A significant adverse environmental and social impact means a "significant, quantifiable, direct, and unavoidable impact" [emphasis added], based on objective, identified written public health or safety standards, policies, or conditions. (Govt. Code, § 65580.5(d)(2).) Preliminarily, we object to the lack of notice of consideration of the Old Gallinas school site as a location for affordable housing. The Board only learned of the consideration on Monday, February 21, 2022. In the past, the County posted notices of consideration of proposed construction developments on our streets, or sent circulars to residents, so they could make a reasoned response. Why such notice was not given here is unclear. In the past, Santa Venetia residents have objected to the County's attempts to either build on the Old Gallinas field, or turn the field into a designated dog park. The residents' objections, then, as now, included concerns as to congestion and parking. Due to the lack of notice, we are only able to offer brief comments as to the unsuitability of the planned development in this location. We do not know, for example, whether the proposal is for the entire closure of the child care center, as well as the field. We do not waive any objection to the lack of notice. We reserve all rights to contest the lack of notice. As a very brief summary, the significant adverse impacts posed by the housing development include the loss of needed facilities for childcare and recreational purposes, traffic congestion on our streets, parking problems, and safety concerns created by the inability of emergency vehicles to access our neighborhood during periods of traffic congestion. There are obviously more suitable alternatives which, under the HCA, does not permit disregarding these adverse impacts. First, the loss of a child center (if such is being considered) will dramatically affect local residents who use the center to permit their children to be cared for while they work. The Legislature has declared furnishing facilities for child care serves an important public interest.1 The field is used by children attending the day care center for recreational purposes. It is unfair to conclude such children should not have adequate recreational space. Second, turning to the traffic congestion issue, North San Pedro is only a two lane highway east of Civic Center Drive until approximately Peacock Gap. This roadway is already heavily burdened by parents dropping off and picking up their children (weekdays 8-9:15 am, 3-4 pm), and buses transporting children to and from the Venetia Valley school. Approximately 730 children attend the school. The turnouts built during the modification of the Venetia Valley school have not eliminated the congestion problems. The HCA expressly refers to congestion management, and provides that nothing in the HCA relieves a public agency from complying with congestion management. (Govt. Code, § 65589.5. subd. (e).)	Email (See Email Comments Received.PDF, pp. 75-79)			X	X	X							X				
I - 251 N San Pedro Road (Santa Venetia)	(Comment edited for length) The Northbridge Homeowners Association ("NHA") respectfully submits these initial comments regarding 251 North San Pedro Rd. (herein, "Old Gallinas School and Ball Field")—and also regarding the identified potential sites in Santa Venetia more generally. We very much appreciate the County's consideration of the below comments. Northbridge is a residential neighborhood in Santa Venetia that is adjacent at its eastern end to Old Gallinas School and Ballfield. Northbridge includes 176 single-family homes as well as a neighborhood pool and privately-owned tennis courts. Given our close proximity to Old Gallinas School and Ball Field, any proposed development of that property is obviously of critical interest (and concern) to our residents. The County's draft candidate site list identifies Old Gallinas School and Ball Field as a candidate site for adding an extremely large number of what would have to be high-density housing units in a relatively small space. The NHA has received feedback from some of the residents in our neighborhood. The scope, size, and would-be density of this, alone, are shocking and of great concern to our neighborhood. Old Gallinas School and Ballfield would be a very poor choice/candidate for any significant housing development for multiple reasons: Please Don't Get Rid of Santa Venetia's Only Ball Field. To accommodate a project anywhere near the scope suggested in the draft list would require not only getting rid of the school buildings (which themselves are currently being used for essential child day care services), but also would require getting rid of (i.e., building on top of) the baseball field which currently comprises the majority of the property. This is the only ball field that Santa Venetia has, and it would be absolutely terrible if it were to be lost. Indeed, the Santa Venetia Community Plan specifically identifies as a major priority: "preservation of existing recreational assets in the community such as the…existing ball and play fields." This item was included in the Community Plan because numerous residents identified this specifically (including the Old Gallinas Ball Field, in particular) as a critical neighborhood asset to preserve. Surely, there must be better candidate sites that don't require eliminating the only ball field for an entire neighborhood (and eliminating a desperately-needed day care facility on top of that). Don't Exacerbate an Already Very Serious Traffic Problem. Adding numerous units of housing where the Old Gallinas School and Ball Field is—and, more broadly, adding hundreds of additional housing units to Santa Venetia—would significantly exacerbate an already very serious traffic problem in the neighborhood. Santa Venetia has one way in and out of the neighborhood, and that one road (N. San Pedro Rd.) often backs up significantly, particularly, but not only, during school drop off/pick up times. Even without the potential additional housing identified in the draft candidate site list, the traffic situation in Santa Venetia is already expected to get worse in the near and intermediate term, as San Rafael City Schools apparently intends to expand and increase enrollment at Venetia Valley School and the Osher Marin JCC also has plans to increase the size and enrollment of its school. As to Venetia Valley School, the County apparently has little if any control over development/expansion plans on SRCS school property. Both the current major traffic problems facing the neighborhood and the schools' expansion plans must be considered in evaluating the traffic impact, and ultimately the viability, of adding any material amount of additional housing to Santa Venetia. Simply put, adding hundreds of housing units to this neighborhood, as the draft candidate site list seems to contemplate as a possibility, would further exacerbate a bad traffic situation and, frankly, would not be sustainable for this community. Additional Housing Units Would Exacerbate Emergency Exit Problems. Adding Hundreds of Units of Housing to Santa Venetia Would Materially Impact the Character of the Neighborhood. If even a fraction of the potential housing contemplated as possible by the draft site candidate list were to come to fruition, it would involve adding large housing complexes that are overly-dense and out-of-character for the neighborhood, creating potential noise and quality of life problems for Northbridge and Santa Venetia more generally. The possibility of adding 186 units of housing to Old Gallinas School and Ball Field Site, alone, would be a drastic change for Northbridge and is of great concern to our community which is adjacent to the school/ball field. Any rezoning/approval of additional housing, to the extent it is deemed appropriate, should carefully limit development to something far less dense (i.e., something in line with the current, prevailing residential density in Santa Venetia)	Email (See Email Comments Received.PDF, pp. 87-89)			X	X				X		X	X	X				

MARIN COUNTY HOUSING ELEMENT: CANDIDATE HOUSING SITES AND SELECTION PROCESS
COMMENTS RECEIVED VIA EMAIL

Location	Comment	Source	PCL	INF	SER	TRF	PRK	PTR	ACT	NMR	SEA	NAT	CUL	FIR	WAT	HLT	EQT	GDL
I - 251 N San Pedro Road (Santa Venetia)	Hello and thank you for the opportunity to comment regarding Future Housing Sites in Marin County. I attended the local Housing meeting regarding Santa Venetia and Los Ranchitos on February 15th and live in the Santa Venetia area. Here are my comments from a Santa Venetia resident perspective: 1. The process, while advised by the Marin County Planning Department, is being run by a consulting agency that is not familiar with Marin County and the local areas & neighborhoods. 2. The number of assigned housing units to Santa Venetia, 422, ignores the following. Before housing site numbers are assigned and accepted, a "CEQA-lite" analysis should be performed to determine if the numbers and locations are practical from a CEQA perspective. We heard these concerns brushed off with the response that if any development is going to be done, a full CEQA would be completed before development could/would proceed. This would be an "after-the-fact" process, with the fact that the housing numbers and sites have already been assigned and accepted, and would be too late to be influential in the development process. a. There is only one practical vehicle road out of Santa Venetia to the freeway that is already heavily impacted by three schools, the one at the JCC, the Marin School, and Venetia Valley school, and a large pre-school. Traffic in & out of Santa Venetia is also already heavily impacted by the JCC, the Civic Center traffic, the Marin Lagoon traffic, the Veterans Memorial traffic, the Marin Lagoon Housing and the commercial enterprises along McInnis Parkway. b. Some of the sites selected are in wetlands areas, such as the McPhail school site next to North San Pedro Road. c. some of the sites selected are next to the Bay and subject to special development restrictions, such as the McPhail school site. d. The total number of housing units assigned to Marin County, and not just to the unincorporated areas, does not take into account the water needs. And we, Marin County as serviced by MMWD, are in the middle of a water shortage with future years looking to be worse due to Climate Change. 3. Using city limit boundaries to direct neighborhood focus and comment ignores the reality of the holistic nature of a neighborhood that crosses city limits and unincorporated boundaries. It is expedient, especially for an outside consulting firm not familiar with Marin County or Santa Venetia, but not realistic. This is especially true for the Santa Venetia area. Santa Venetia is heavily impacted by what the City of San Rafael does or does not due around the Civic Center, at the intersection of North San Pedro Road and Civic Center Drive, around Marin Lagoon Park, at the Marin Lagoon homes neighborhood, and at the Marin Ranch Airport. Using city limit boundaries is expedient but not accurate and realistic in appraising housing impacts to a neighborhood such as Santa Venetia. And restricting the geographical area that Santa Venetia residents can comment on and have input to, to not include what is inside the City limits of San Rafael for the areas noted above is violating our rights to comment on and have input to what is impacting our neighborhood. Thank you for the chance to comment	Email					X				X				X	X			
I - 251 N San Pedro Road (Santa Venetia)	Here in Santa Venetia, we are living with water shortages, traffic congestion, and our community's evacuation route was named the most dangerous in Marin and yet huge additional numbers of housing are proposed for this flood prone neighborhood. That's insane! We are not fooled by claims that these new residents won't drive everywhere. They will. We already know that every person of driving age in our neighborhood not only drives but owns a car, or truck. They line our streets, further restricting access routes. There are sites where housing can happen like at Northgate Mall, but not in our overcrowded flood zone.	Email				X				X	X			X				
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I - 251 N San Pedro Road (Santa Venetia)	I attended the zoom meeting a few nights ago. I share the concern of some of my neighbors, well articulated by Gina Hagen. While I totally support affordable housing (so question if this will be "affordable" for working class people), I think we already have too many high density buildings on San Pedro Road, Jcc, school, rest homes, elder affordable housing, civic center etc... So I would support maybe 25 more units or something manageable, but hundreds seems like asking for trouble in an emergency. I live on Labrea way and I am glad we have housing for families, down the street, but a common problem is the amount of cars and high occupancy of some of the apartments. The overflow of cars goes all the way to Rosal, and currently I have had cars parked in front of my house for a month and more. It is not a significant problem in my case, but my neighbor who has teenagers with cars, is having to struggle to park their own cars, while the overflow is from housing two blocks away. Obviously San Rafael is a good place for more housing and i would think a place closer to the freeway like Marin Square could be used for extra units of housing. I also would personally like to build an accessory unit in my front yard for a student, teacher, medical professional, at affordable rate. It would be nice to have a department in Marin county who could help seniors like myself design,, get permits, and loans to afford to create such units. I myself was a renter in Marin for 36 years and lived in in-law apartments. I found it much more private and a win/win solution for the owner, typically older retired person, and myself as young professional. I was excited about an organization called Lily Pads and attended a meeting but found out later the owner was no longer providing services. So this would be a great thing to promote. Thank you for including us in your work. Hope we can have more affordable housing, while preserving the safety of our neighborhoods.	Email					X			X								X	

Location	Comment	Source	PCL	INF	SER	TRF	PRK	PTR	ACT	NMR	SEA	NAT	CUL	FIR	WAT	HLT	EQT	GDL
I - 251 N San Pedro Road (Santa Venetia)	I served on the Santa Venetia Community Plan (SVCP) Committee for almost 10 years, including working with County Staff the last 4 years, until its final adoption in 2017. This process included a thorough survey of our neighbors who commented on every empty parcel and open space for future development (and in fact Godbe told us the response was overwhelming with a higher than normal percentage of participation). Our SVCP Committee Members represented every corner of Santa Venetia. We held community meetings (that were well-attended) so all residents had a chance to voice their opinions and ideas. No one knows Santa Venetia better than Santa Venetians. The plan was supposed to cover everything of interest to ensure a diverse, family-oriented, and happy community for years to come. Adding 442 units is simply untenable for a small, working-class hamlet such as Santa Venetia. The last two open spaces (two ball fields) are slated for high density housing. This is totally uncharacteristic of the surrounding neighbors who live in small, single- family housing. In the February 15th Housing Element Zoom call, with County Staff and Contractors from… who knows where?, we were informed that our Community Plan would need to be updated. Who would do this work? When and how soon would these updates happen? How can the County randomly update our Community Plans that we spent so many resources on. SB-9 and SB-10 are a complete contradiction to our Community Plan that we dedicated years of work and volunteer hours to finally see its adoption. These past summers, we've stayed inside due to smoke and/or triple-digit weather. We used a bucket from our shower to water our indoor and deck plants while our yard withered and died due to restrictions and requirements in place from Marin Water. We worked out evacuation routes to alert residents to escape danger due to our one road in and out of Santa Venetia. I heard chain saws, chippers, and weed whackers almost every day, regardless of the high, fire-danger days. This is due to San Rafael Fire Department notifications and requirements. Also, there is currently a plan in place for creekside residents to have their wooden levees raised two feet to protect the sinking, below-sea-level homes in the flood zone (Zone 7), due to Sea Level Rise. The CDA is currently working on a "Safety Overlay Map" to be completed after the Housing Element site are chosen. Isn't this a case of "putting the cart before the horse"? Due to the location of Santa Venetia, nestled before the ripe, fire-prone area of San Pedro Ridge and the rising Las Gallinas Creek, doesn't this deserve a second look and/or consideration of the over-inflated number of units allotted to our small hamlet. When talking to my neighbors, the 422 units sounds so incredulous, they find it impossible to believe. As a volunteer, seasoned Land Use Member, I can't say I blame them. It's mind-boggling. Please reconsider Santa Venetia's allotted housing site numbers.	Email									X			X	X			
I - 251 N San Pedro Road (Santa Venetia)	I will reiterate the comments I made at the February 15 Housing Element meeting… I've lived in SV for over 30 years. I've served on the Santa Venetia Neighborhood Association Board of Directors for almost 30 years. Through our neighborhood association, The Santa Venetia Neighborhood Association (SVNA), we try to get the word out so that our residents are aware of upcoming projects and opportunity to comment. We've heard from Santa Venetia residents that they want to protect our quality of life. We are already concerned about the constant fire danger, flooding, Sea Level Rise, ingress and egress, and unsafe evacuation routes. Climate change is a huge concern for us and as well, we have run out of water in Marin County and are under strict mandates, so I can't understand how adding more and more housing units will help. And to restate, 422 units in SV is an increase of almost 25% of the 1,700-1,800 units we currently had, at last count. It's a very shocking number of additional units for us. I grew up in San Rafael. I hate what they've done to the City and have been constantly disappointed with the building choices and what they have given up. I don't want to see that happening in Santa Venetia – more congestion and loss of our green spaces. Affordable housing sounds great on paper, but we never seem to get that promise fulfilled. I've followed projects in San Rafael and for almost every project, the promise is a huge amount of housing with a small portion designated affordable and then after the project passes through the hurdles, the affordable-housing number is adjusted… always downward. I remember previously rules were passed to keep up with the demand of affordable housing, but the goalposts seem to constantly change and that number is lowered. What is the promise that won't happen with this process? Also, I heard them say at that meeting, they were giving schools and churches more flexibility by allowing them to build on parking lots? If that is the case, where will people park? They've already lowered the parking needed for new building in our communities. We already have overblown congestion, car-to-car parking along the road, and lots of red curbs. The idea of reducing parking requirements for new units AND building on parking required for old units is frightening. And finally, I realize this mandate for housing comes from the state. I believe we (my neighbors) are all on the same page when I ask that you push-back against these mandates. These are not only unrealistic for Santa Venetia but for all of Marin, the wonderful county I grew up in.	Email								X	X	X		X	X		X	
I - 251 N San Pedro Road (Santa Venetia)	Re: Marin County Housing and Safety Elements Update, 2023 – 2031. The Santa Venetia Neighborhood Association (SVNA) is an organization representing the interests of 1,700 – 1,800 households (4,474 residents per the 2019 census figures) who live in Santa Venetia. As an organization, we are dedicated to the enhancement and preservation of the character and quality of life of the Santa Venetia neighborhood. We do our best to represent our community and have an established reputation to be a voice for proper development. And in accordance with our mission statement, we, the Board Members of the SVNA, feel compelled to comment on this issue. We want to ensure that the Marin County Board of Supervisors receives an accurate impression from our community regarding the updated Housing Element and are writing today to summarize feedback we have heard from many of our members. Many residents of Santa Venetia, including members of the SVNA, attended the February 15 Zoom meeting where consultants representing the interests of the housing element initiative presented online tools for community feedback. We find these tools inadequate; rather than serving as an open platform for the BOS to receive realistic community input, they seem designed to provide information to housing element staff as to where to add more housing. The Housing Element recommends 422 additional units for Santa Venetia. There are currently fewer than 1,800 residences in Santa Venetia, so this represents an increase of approximately 25%— far more growth than the neighborhood has seen for at least two decades. This mandate seems utterly siloed from the worsening reality of global warming and climate change, (the existence of which was recognized both in the Countywide Plan and by the Marin County Civil Grand Jury) which is leading to catastrophic weather events such as fires and flooding. The upland parts of Santa Venetia not directly threatened by flooding are part of the Wildland Urban Interface (WUI) and are subject to year-round fire danger. Like all of Marin, we are constrained by drought, and our water supply comes from tanks that are sited in the WUI. We are actively working actively to protect our homes; parts of Santa Venetia are now Firesafe Marin neighborhoods. Road access to Santa Venetia is highly constricted; we have daily traffic congestion that affects both egress and ingress. The remaining undeveloped parts of Santa Venetia include unstable hillsides that recently led to multiple landslides onto our roadway. All of the issues mentioned above are familiar to the Marin County BOS. They are also the same reasons that Santa Venetia has not experienced anything close to 25% growth in decades. There is no way to grow by 25% using market-rate housing on undeveloped parcels without compromising our safety. The Housing Element directly suggests that our personal safety, including safety from climate events, fire, and safe water supply, is secondary to their objectives of housing growth. One type of growth we believe is needed in Marin County is true low-income housing. By this we mean the type of housing that our current typical Santa Venetia resident could afford. We also support the right of residents to add accessory dwelling units (ADU) to their homes. However, it was clear that the Housing Element does not include plans for significant numbers of low-income housing. Instead, it promotes "market rate" housing, which we know means homes that will sell for millions of dollars each. We are effectively being asked to endanger ourselves to serve the interests of developers to sell multi-million- dollar homes to elite buyers from outside of the region. To paraphrase one of our SVNA members, "The County's first responsibility is for the health and safety of the existing residents of our neighborhood." We ask you to consider this as you move forward. If the intent of the Housing Element is to bypass CEQA process, as alluded to in the Zoom meeting on Feb. 15th, the existence of culturally sensitive resources, including shell mounds in Oxford Valley, still cannot be ignored. Damaging cultural resources of native peoples in order to comply with Housing Element goals would be inconsistent with Marin County values and our historical respect for our earliest Santa Venetia natives. Oxford Valley, the site of known shell mounds, has been designated for 45 "above moderate income" units. Other areas of Santa Venetia may not yet have been properly surveyed for these resources, and bypassing CEQA would also eliminate their protection. These are just a few of the concerns that we have. The SVNA has encouraged our members to send comment letters as well, citing their concerns about this update. Please include those concerns as concerns of the SVNA	Email				X				X	X			X	X		X	

Location	Comment	Source	PCL	INF	SER	TRF	PRK	PTR	ACT	NMR	SEA	NAT	CUL	FIR	WAT	HLT	EQT	GDL
Inverness, Balmoral Way	(Comment edited for length)I am a resident of Old Inverness, specifically Balmoral Way. Please consider the following comments as you finalize your recommendations: The entire approach of this planning effort is misguided. The consultant seems to have arbitrarily plopped new housing onto a map of West Marin without considering County planning history, constraints on the land, or natural resources, let alone community input. This top-down and ill-informed approach is unlikely to succeed, certainly not without damaging community good will, neighborhood cohesion, natural resources and other values of importance. The sites to be developed should be chosen only after a thorough inventory of geology, water supply, slope and other relevant factors. The 2007 Countywide Plan conceived of the entirety of West Marin as a rural, agricultural and low-density region, serving the Bay Area's recreational needs. This reflects the large proportion of the undeveloped lands that are protected as national, state and county parks. Further it carried forward the zoning decisions of the Board of Supervisors in the 1970's, which put a high priority on agricultural and natural resource preservation. If not implemented with great care, this plan risks contravening the supervisors' vision for West Marin. It should not be carried out until the County as a whole considers the larger planning goals for the area. An "elephant-in-the-room" with the housing shortage is the effect of AirBnB. If the County could reign in this business, the housing supply would quickly rebound, with numerous benefits to the community. Additionally, any new regulations for implementing the current planning process must avoid the ironic outcome that the newly constructed residential sites will also be converted to vacation rentals. Indeed, I suggest the County begin its effort to increase housing supply by tackling this behemoth before undertaking the kind of process it is currently engaged in. Assuming willing sellers of residential properties can be found on Balmoral Way, developers will find they are unsuitable for high density projects. Most of the lots slope steeply downhill to a floodplain of Second Valley Creek to the north or a smaller riparian zone to the south. The California Coastal Commission has jurisdiction over the whole neighborhood; this circumstance will render any permitting process lengthy, difficult and expensive. No sewers are available in Inverness. The Coastal Commission has already reacted negatively to the prospect of increasing the number of septic systems due to the likelihood that more leachate will be detrimental to the already-poor water quality of local streams and Tomales Bay. The Inverness Public Utility District is already struggling to meet the current demand for water. This past summer, we were forced to accept severe limits on usage. With the uncertainty that climate change is bringing, it would be risky to assume that the 2021 drought is unlikely to be repeated. Inverness is unsuitable for low-income housing. First, the price of undeveloped land is decidedly high. Additionally, there are few jobs to be had in West Marin and the availability of public transportation for commuting to jobs in east Marin is almost nil. Accordingly, any new residential construction should be geared for moderate to high income residents. The Inverness Community Plan, (adopted in 1983)(ICP) provides little support for the concept of substantially increasing housing and for good reasons: The Plan states that even then, there was insufficient water for new connections. There is no potential for municipal wells on Inverness Ridge and although wells were stated to be feasible in the alluvial fans, the Coastal Commission is unlikely to allow them. Grading of Inverness's hilly lots in preparation for construction would significantly increase sedimentation of our creeks and the Bay. The Old Inverness neighborhood is already close to complete buildout. The entire town of Inverness has poor transportation resources. As noted above, public transportation is not readily available. The ICP notes that the "likelihood of improved transit service to and from the Inverness Ridge Planning Area is remote at best." The roads are narrow and, in many cases, do not allow two-way traffic. Moreover, there is only one road leading in and out of the town, Sir Francis Drake Boulevard. In the increasingly likely event of a wildfire, serious and potentially dangerous congestion and traffic is likely to occur during an emergency evacuation. Additional population would exacerbate this risk. In sum, adding substantial quantities of new housing to Inverness would require a significant revision to the Countywide Plan and the Inverness Community Plan, policy changes at the Coastal Commission and greatly increased sanitary facilities. Even if these hurdles can be overcome, the lack of water resources and the emergency evacuation challenges would require a significant reduction in the scale of the	Email (See Email Comments Received.PDF, pp. 16-19)	X	X		X		X		X		X		X	X	X	X	
Inverness, Balmoral Way	I am writing about the draft list of "underutilized residential housing" in Inverness, specifically those listed on Balmoral Way in Inverness. I am the property owner of 5 Balmoral Way. Imagine my surprise to see my own property (and my house which was fully rebuilt in 2015 with full permits from the county) included on this list as "underutilized residential housing." I was even more surprised to see all of my neighbors' homes on Balmoral Way (in which my neighbors live) to be similarly listed. Obviously the folks who came up with these addresses on Balmoral Way made a significant factual error that needs to be corrected by deleting the Balmoral Way addresses from the list. This isn't about NIMBY -- this is simply a factual matter that the listed addresses are not underutilized housing sites. Balmoral Way is a small, one-lane, private, dirt road with no empty lots. Each lot is already built on and fully-utilized. Each lot has a steep incline. All lots are near the water of Tomales Bay and highly constrained in terms of septic system expansion. While perhaps we residents of Balmoral Way should consider it an honor to be listed as the epicenter of underutilized residential units in Inverness, alas, it is an error by those who compiled the list and is divorced from reality. In summary, as a simple factual matter, the housing stock on Balmoral Way in Inverness is fully-built-up and fully-utilized and should not be listed as "underutilized"; all the Balmoral Way addresses on the "underutilized" list should be removed. Thank you for your kind consideration of this request to correct clear and obvious factual errors in the county's data.	Email	X							X					X			
Inverness, Cottages at Point Reyes Parcel	Re: Cottages at Point Reyes Seashore parcel, Inverness. This parcel is inappropriate for proposed development for two very serious reasons: 1) it is in a high fire danger zone, and 2) is prone to floods and landslides. 1: The adjacent hundred+ acres of private and public bishop pine forest is long untended and seriously overgrown with brush and dead trees, and has not burned in almost 100 years. Wildfire in the canyon would directly threaten our family homes and all our neighbors on Pine Hill Road, Kehoe Way and Vision Road, in addition to all of the residents of Seahaven on the north. 2: The canyon was damaged in the 1982 storms, which unleashed large amounts of mud and rock, and woody detritus, into the bottomlands, and it is unstable as far as landslide danger (take note of the problems on Sir Francis Drake Blvd. above). Without any doubt, these events will be repeated in the future. For these reasons alone, this is one of the least appropriate areas for future housing. Douglas (Dewey) Livingston	Email									X	X		X				
J - 9840 State Route 1 (Olema)	I think that the proposed low cost housing sites and sizes and the solution is not thought out ! For instance , the 98 homes in Woodacre would create a huge traffic problem and also be inappropriate . The Olema location and proposal would ruin the nature of Olema ! And Dennis Rodoni lives in Olema ! The west Marin area has been protected for a reason ! The nature and small town is the reason that we are all here ! I've lived here for 46 years and believe that it would be more appropriate to absorb the housing on properties that are all ready developed and make it attractive for homeowners to build ADUs Please revise the thinking around this important topic of affordable housing !	Email								X		X						

Location	Comment	Source	PCL	INF	SER	TRF	PRK	PTR	ACT	NMR	SEA	NAT	CUL	FIR	WAT	HLT	EQT	GDL
K - 1500 Butterfield Road (Sleepy Hollow)	(Comment edited for length) I am a Marin County native, longtime resident of Sleepy Hollow, and a former member of the Sleepy Hollow Board of Directors. I am also a licensed real estate appraiser, and an MAI-designated member of the Appraisal Institute, although I write this letter as a concerned private citizen. This letter pertains to the revised housing element, in particular the San Domenico School site, but these points apply equally to all proposed West Marin sites. Sound urban planning supports higher density development along existing highway corridors, and "low" and "very low" income housing should be constructed near employment centers and in areas with adequate public transportation and adequate infrastructure, including shopping, hospitals, schools, etc. None of the West Marin sites offer these basic amenities. In particular, the Sleepy Hollow site at the end of Butterfield Road on the San Domenico School campus is slated for 90 units, of which 56 are "low" and "very low" income. There are several serious problems with the plan, most notably the bulk and size of a 90-unit development in a low-density, semi-rural location. The major issues are as follows: 1. The Sleepy Hollow site (San Domenico campus) is zoned for a minimum density of 1 dwelling unit (d/u) per 10 acres. The San Domenico parcel is +/-551 acres, so the maximum allowable number of units is 55 units, and probably far less, once slope is factored in. The current allocated number of 90 units far exceeds the County's own General Plan. 2. The height and bulk of a 90-unit development is incompatible with the low-density and semi- rural character of Sleepy Hollow, where the existing zoning is one acre minimum lot size. Assuming 1,000 square feet per unit, the building will be a minimum 90,000 square feet. Assuming 4 stories (well above the current allowed height restriction) and an 85 foot width, the length would be +/-265 feet, far larger than any current commercial building in Fairfax or San Anselmo with the exception of Safeway and Rite Aid in Red Hill Shopping Center. Onsite parking would certainly be required because the location is 100% auto-dependent. A minimum of 5-7 acres abutting County Open Space would be permanently lost. 3. A development of this size would likely require a significant sewer upgrade. Other infrastructure upgrades might also be necessary to handle an additional 90 households. There are +/-785 existing homes in Sleepy Hollow, so 90 units is a 10% increase in households overnight. A cost benefit analysis should be conducted to see if the project even pencils out. And certainly, an EIR will be necessary. 4. The proposed location is in the wildlife urban interface (WUI) with elevated wildfire risk. Butterfield Road is only road in and out of Sleepy Hollow, and evacuation of residents in case of wildfire has been a major safety concern of the Sleepy Hollow Board for many years. The "Achilles Heel" of Sleepy Hollow is single point of ingress/egress. 5. There is inadequate public transportation to support a 90-unit development, particularly if 56 are "very low" and "low" income units. These households may lack a car, and the location is 100% auto-dependent. 6. The Sleepy Hollow location is over 5 miles to the nearest employment center in San Rafael, and is three miles from the nearest supermarket which is "upscale" (Good Earth) and expensive. It is over one mile to the nearest school, which is currently operating at near full capacity. 7. Of the proposed 90 units, 56 are "very low" and "low" income households, or over 50%. The median HH income is Sleepy Hollow is $255,000, and the average housing price is around $2 million. What formula is used to determine the number of "low" and "very-low" income households that go into a location?	Email (See Email Comments Received.PDF, pp. 99-101)	X		X		X	X		X		X		X		X	X	
K - 1500 Butterfield Road (Sleepy Hollow)	I live in Sleepy Hollow. I am concerned about the San Dominico site (which proposes adding 90 housing units to a community with ~800 households) for two main reasons. 1) Safety. Butterfield is a one way in one way out road. In case of evacuation, increasing the households by over 10% is troubling. Cars at the far end of Butterfield tend to speed. Adding more cars at the very end of the road significantly increases the risk of cars speeding. 2) Traffic. There is almost no public transportation on Butterfield. San Dominico already has a strict traffic commitment with the community because traffic is so bad. This would make it worse. There are three schools which adds to the traffic on Butterfield. Best practices for increasing housing is to do infill in urban areas. This is the opposite. It's building far away from public transportation and freeway access. What makes the most sense is to build as close to highway 101, bus terminals, Smart, etc.	Email				X		X						X				
L - 26500 Main Street (Tomales)	Your proposal to place 186 low-income units on this site is not fair nor does it make sense for the following reasons: You will take away a little league ball field currently used by the nearby communities. t may displace the early development center on the site. he immediate area already supports a section 8 housing community at the corner of North San Pedro and Schmidt Lane. This development will put an unfair burden on the surrounding neighborhood. here is a site at McPhail School down the road on North San Pedro that accommodate the same number of units without removing the little league field and have less visibility to the nearby neighborhood.A s stated in another comment, Bon Air shopping center could accommodate most if not all of these units.	Email			X					X								
Lucas Valley	I do not support the proposed quantity of housing proposed for Lucas Valley. I am concerned about water resources, evacuation congestion in a fire, lack of services for new people in the area, increased road congestion and increased wildfire risk. This is not a NIMBY response. The Rotary Village is a great example of affordable housing for seniors that is near our community which is lovely. Expanding this type of housing would be welcome. Highrises are not welcome as they do not fit-in with our area. greatly reduced quantity of one or two story homes would be welcome. Why are we targeted with such a large percentage of the proposed housing? This is not an equitable plan. thought the Governor wanted housing in urban centers where services were available. Your plan does not meet this key criteria.	Email			X	X				X		X		X	X		X	
Lucas Valley	I have resided in Upper Lucas Valley since 1986. Part of the appeal when I purchased here was the rural setting. Although I understand the need for housing, high density housing is inappropriate for Marin, i.e. large multi-unit structures. I welcome the addition of single family residences as many younger people need homes here desperately. I'm not sure where they would be situated in this area, but am open to suggestions. When George Lucas proposed affordable housing further down Lucas Valley Road, the main concern was the lack of transportation, grocery stores, and the other necessities. It made no sense. Another suggestion would be to make it possible for seniors to give (not sell) their larger homes to their children, purchase smaller homes and retain their property tax base. Most people in that position don't/can't move because buying a smaller home for $1+ million brings with it property taxes they would find unaffordable. The only way it is currently possible is to sell your existing home and buy a cheaper one. When thinking of housing, perhaps the smart thing to do is build an area of affordable homes in the 1100-1500 square foot range for seniors. That would free up many, many existing homes for growing families.	Email			X			X									X	
Lucas Valley	I just want to officially voice my opposition to the development of additional homes in the Lucas Valley area. While I support the development of affordable housing in Marin County, protecting our undeveloped green spaces is an even higher priority. Instead, I believe areas that have already been developed (green space replaced with concrete) such as towns in southern Marin or places like Northgate Mall would be better options for new housing. Our undeveloped green spaces are priceless and irreplaceable!	Email								X		X						
Lucas Valley	It's come to my attention the HOA to which I belong is objecting to proposed increased housing in Lucas Valley. I would like to inform you that the Lucas Valley HOA is not uniform in this opinion. There are members, such as myself, that would welcome additional housing in Lucas Valley. While I found some of the HOA's arguments moderately persuasive (especially with regard to access to public transportation), I believe the need for more affordable housing in Marin trumps all of their points. I encourage you to keep Lucas Valley on your radar for proposed housing sites, and to find ways to encourage and incentivize more public transportation in our community.	Email						X									X	X

Location	Comment	Source	PCL	INF	SER	TRF	PRK	PTR	ACT	NMR	SEA	NAT	CUL	FIR	WAT	HLT	EQT	GDL
Lucas Valley / Marinwood	(Comment edited for length) The Lucas Valley Homeowner's Association represents 538 homes in the special R-1:B-LV zoning track in Upper Lucas Valley. We, the Board of Directors of the LVHA, would like to give our support for the efforts to increase housing in Marin County, and offer the following input. To begin with, our State Governor's Housing Plan incentivizes housing in urban centers near transportation and services, to reduce reliance on vehicles and their carbon footprint. If the County chooses a path contrary to the State Plan, and not utilize State funding incentives for urban development, then we ask for a reevaluation of the housing sites identified for our Lucas Valley/Marinwood area. As outlined below, areas 1 - 3 are both contrary to the RHNA requirements and pose a danger for emergency evacuations. There are several sites identified as potential home building sites in our area. 1. Lucas Valley Road / Mt Muir Court 2. Juvenile Detention Center/Jeanette Prandi Way 3. 7 Mt Lassen 4. 530 Blackstone Dr 5. Marinwood Market area. We agree that the Marinwood Market area is a suitable site. It is close to freeway access and has sufficient infrastructure in place, including amenities like food and gas, and can easily absorb new development. Ironically, the relative quantity proposed/identified at this site is comparably less than the quantity for site #2 above, which is a much less suitable site as shown in following comments. There are several factors that make areas 1 - 3 only marginally suitable for new building sites, and therefore should, at best, be only allowed limited building. Factors include: High Wildfire Risk - Single Limited Evacuation Route. Water Shortages. Lack of Infill Infrastructure. Building Atop Unmarked Graves. Zoning Restrictions: The special zoning district for Upper Lucas Valley (R-1:B-LV) limits most buildings to a single story. The district was created in order to adhere to the architectural vision and design aesthetic of Joseph Eichler, a renowned architect highly influential in modern architecture. The existing low income senior living homes on Jeanette Prandi Way are likewise single story. If a housing development is allowed near the Juvenile Detention Center site, 7 Mt. Lassen, or Muir Court, they would have to be single story to maintain the character of the surrounding architectural landscape. This would limit the number of units allowed at these sites. Juvenile Detention Center: The concept of constructing multi-family housing at or adjacent to the Detention Center poses challenging logistical and feasibility issues. The County's attempts to reduce juvenile incarceration has been largely successful; however, not to the point where closure of the facility is possible. Marin County's criminal justice program continues to call for incarceration of violent youth offenders, and does not currently have an alternative detention facility. Consequently, any new housing at the Jeanette Prandi location would be adjacent to the Detention Center. It may be quite difficult to convince a developer to invest in a location where part of the "selling pitch" to residents is proximity to a detention center, particularly given that the facilities at Juvenile Hall are in major disrepair. Long History of Racial Parity. Among the factors the County is reviewing in selecting sites is historical discrimination. Our community has no such history and should not, therefore, be a priority for desegregation. Unlike many restrictive covenants in other neighborhoods in Marin County and across California, our CC&Rs have never contained language restricting homeownership based on race, creed, color or religion. Our community celebrates diversity, and we want to make clear we have no history of resisting it. Indeed, it has been reported by original LVHA members that our community attracted a large number of buyers of Asian descent as it was one of the few areas that they were not discriminated from buying into. Locating Housing Near Services and Transportation: The Board of Supervisors affirmed several principles for deciding potential Housing sites and distribution in 12/2021. The potential Housing sites listed for the Lucas Valley communities seem to ignore the mandate for locating housing near services and transportation. The Lucas Valley Community believes the County should be practical and realistic in identifying sites to satisfy the RHNA requirements that do not create a danger to existing communities, will actually serve the goals of the housing mandate, and that show homage to our beautiful and historically significant community. We respectfully request the County to rethink its "rural" VS "urban" housing development plans in light of the State's most recent Urban Housing strategy and funding incentives.	Email (See Email Comments Received.PDF, pp. 173-178)			X		X				X		X	X	X	X		X	
Lucas Valley / Marinwood	All of the Lucas Valley sites are in the wildland urban interface (WUI) zones that contradict Governor Newson's priorities to shift housing away from rural wildfire-prone areas and closer to urban centers.	Email										X		X				
Lucas Valley / Marinwood	Due to FIRE danger and Drought please stop more construction in Mount Marin and Lucas Valley.	Email												X	X			
Lucas Valley / Marinwood	I am against housing development down Lucas valley and Marinwood. The weather here gets windy starting in spring and ends in the late fall. The surrounding mountains can catch on fire as we had a small one last year. With the drought we are already under rationing. A spark can create a fire and the wind will carry it all over the place. There are no exits except Lucas Valley road and in case of a fire it will be difficult for all to evacuate. Most locations you are considering are in heavily populated areas. Where would we go i n case of a fire? 101 will be impacted. Yes we need affordable housing, not more multi million dollar homes. If the water department would consider building a desalination plant off the bay of San Francisco it would help us out. We are in global warming and more cars on the road and more pollution will set us back. What about the empty land space between Novato and Petaluma?	Email				X				X				X	X	X	X	
Lucas Valley / Marinwood	I am extremely concerned about the proposed new developments in the Lucas Valley Marinwood area, especially when taken together with other large new development projects in the nearby vicinity. I realize California has a housing issue. However, destroying existing communities is not the solution. The number of added housing units in the LVM area alone will utterly destroy our school system. The Miller Creek School district currently serves about 2000 students. Just one proposal would add 1800 homes and possibly triple our student needs. Where will these children go to school? Similarly, almost 250 homes in the Prandi location would increase the Lucas Valley Elementary school population by a similar 200%. This will overwhelm our schools, and other community services. If there is another huge build at the Northgate site, also in the Miller Creek School district, it's even worse. I'm also worried about many environmental considerations that seem to be ignored. One has only to look at the debacle of the Talus development to see that these plans are not in the interest of the community or environment. These were not affordable homes for teachers and firefighters, but large expensive homes with big lots. Now we have a razed hillside, threats to our creek, destruction of few remaining heritage trees and wildlife habitat and one giant fire hazard with an enormous pile of dead trees and brush. This is what happens when projects are rammed through without proper review and oversight. Traffic increases will be a nightmare. In an emergency, how do we escape with the gridlocks that will occur? Lucas Valley Road and 101 are already jammed with cars especially at commute times. We are in continuing drought, unlikely to ever improve thanks to climate change. Where does the water come from for this new population? A few of the proposed sites make sense but this large scale unbalanced load into our small community does not. Any development should be tailored to fit the need (ie truly affordable housing, not a token 5%) and address community concerns. It's time for our community to have a say in protecting our schools, neighborhood, the environment, and our safety. (Photo attached) Is this what we want Lucas Valley to look like? What an eyesore and environmental disaster for a few houses for rich people (and richer developers). Look at the giant pile of flammable dead heritage trees!	Email				X				X		X		X			X	
Lucas Valley / Marinwood	I am writing in regards to the proposed multi unit housing in Unincorporated Marin County. I'm against using open space to build housing. The site in the open space on Lucas Valley Road should be used for a community park or sports center for the community. Kids need a place to go that could include Basketball, Swimming, Playstructure and lawn for families. I understand the need for additional affordable and Multi-Family housing in Marin, but why Open Space? The County should be looking to improve areas that need improvement, not use open space to pour concrete and build multi level boxes. What about repurposing and improving small strip mall areas all along the freeways? These building have small space and often times run down retail shops and turning those in to thriving shops with housing above. Several responsible counties and cities have successfully done this. Why can't Marin think this way? I don't understand it. Open space should remain open space or for public park use. Dilapidated buildings should should be improved to include affordable housing for the better of the community.	Email										X						
Lucas Valley / Marinwood	I moved to San Rafael specifically to get out of the city and to avoid over congestion, traffic and over development. The proposed additional housing in Marinwood and Lucas Valley will detract from the exact reason I moved here. Over development of north bay is an issue - and just because there is land does not mean it should be developed, which will permanently change the character of the community and landscape. I was unable to sign the petition against the new development, so sending this email instead. Thanks.	Email				X				X		X						

Location	Comment	Source	PCL	INF	SER	TRF	PRK	PTR	ACT	NMR	SEA	NAT	CUL	FIR	WAT	HLT	EQT	GDL
Lucas Valley / Marinwood	I see the maps and have concerns that things aren't matching. The Housing Distribution Scenario says: Ensure Countywide Distribution - really? It looks like a disproportionate amount of it is in unincorporated Marinwood/Lucas Valley - 3,569 units to be exact. And some things to remember: We are a fire danger area now that we have had a fire evacuation this last summer. And what happens to road traffic during an evacuation? And it they don't drive, what happens to them? And what about the Water Shortage in Marin County with conservation being the ONLY SOLUTION so far? It is my understanding that the builders of these units won't have to pay property tax. So what does THAT do to our schools? Fire Department? EMT? And who picks up the tab....Marinwood/Lucas Valley homeowners? And do we pick up the tax tab for ALL THE UNINCORPORATED AREA of 3,569 units? Encourage Infill and Redevelopment Opportunities: Can the residents of these residents drive? Are they close to services, jobs, transportation and amenities? I don't think so, especially if they can't drive.	Email			X	X		X						**X**				
Lucas Valley / Marinwood	The 2022 Marin County Candidates site for Unincorporated Marin and especially Marinwood/ Lucas Valley/Silveria Ranch is absurd. It targets just 5 square miles with 80% of the housing allocation for affordable housing in one community WITHOUT essential planning for schools, roads, government services, water, sewer and other essential services. Why "plan to fail"? Shouldn't a good faith effort to build affordable housing in our community also include a comprehensive plan for accommodating growth? It doesn't. This is why it should be rejected today. Instead, let's address the core questions for growth AND the financial impact of adding massive amount of largely non profit housing to a single community WITHOUT ADDITIONAL TAX BASE. Marinwood/Lucas Valley currently has approximately 2700 housing units for 6000 residents. The proposed housing sites could add 2300 apartments and 5500 residents who ALL WILL NEED schools, water, government services, transportation, access to shopping, etc. Shouldn't a proper plan for growth precede approval for housing? One of the sites listed is Marinwood Plaza, our communities ONLY commercial plaza within walking distance for thousands of residents. If the plan for 160 units is approved, this would squeeze out a vital community center to the detriment of all. This is not including the problem of TOXIC WASTE contamination clean up suitable for residential dwelling is a long way off despite community pressure on the Regional Water Quality Control Board who will not enforce its own clean up orders on the current owners. Despite the harsh criticism of the RHNA process, I believe there is a real community desire for more affordable housing in a community that will be planned appropriately, won't redevelop our neighborhoods and utilize open spaces like Silveira Ranch, St Vincents and other sites. While everyone I know supports the idea of more housing, not a single one wants a poorly conceived plan that forces large housing projects without considering the impacts. Reject the current RHNA plan until a comprehensive community plan with real public input can be drafted. PS. The "Balancing Act" tool is NOT a serious tool for community input. Less than 25% of the homes under consideration were ever included in the database. I do not find "our database could not handle the data" as a credible reason from the Community Development Department. If you want REAL success seek REAL community support.	Email		X	X					X		X				X		
Lucas Valley / Marinwood	This letter is in regards to the proposed site and distribution of housing in the Lucas Valley/Marinwood area. While I feel this area can support some expansion, the amount proposed by the county is overwhelming. Per the board of supervisors principles, please note my feedback below. 1: Ensure Countywide Distribution: The majority of housing in unincorporated Marin County is being distributed to Marinwood/LUCAS VALLEY. This does not appear to be an equitable distribution and will potentially double the population of this area, affecting all services- sheriff, fire, schools, traffic, etc. Marinwood/LUCAS VALLEY area is being considered for a majority of this housing in unincorporated Marin: St Vincents: 1800 Marinwood Market: 136 Blackstone (site of religious house): 32 Mt Lassen/deli: 58 Jeanette Prandi/Juvi: 254 Lucas Valley Rd/near terra Linda Ridge: 26 Total: 2306. (This could be up to 60% of the total housing for unincorporated Marin) Households in Marinwood/LUCAS VALLEY currently 2412. (This could potentially double our size)	Email		X	X	X				X				X				
Lucas Valley / Marinwood	This letter is in regards to the proposed site and distribution of housing in the Lucas Valley/Marinwood area. While I feel this area can support some expansion, the amount proposed by the county is overwhelming. Per the board of supervisors principles, please note my feedback below.4: Consider Environmental Hazards: WATER AND WILDFIRE…. This pertains to most of Marin County. We have a limited supply of resources to accommodate doubling of the population of marinwood/Lucas valley.	Email								X		X						
Lucas Valley / Marinwood	We have seen the preliminary list of potential housing sites for Marin County, including in unincorporated areas such as Marinwood/Lucas Valley, as developed by the ABAG (Regional Housing Needs Allocation Plan), and approved by the California Department of Housing and Community Development. The plan includes 2,412 units within the Lucas Valley / Marinwood area (accounting for 68% of the 3,569 units within unincorporated Marin County). Sites under consideration in the Marinwood / Lucas Valley areas: St Vincent's School - 1,800; Marinwood Market – 136; 530 Blackstone Drive (site of religious house) - 32 7; Mt Lassen (site of office park) – 58; 2 Jeannette Prandi Way (site of Juvenile Hall); 254 LucasValley Rd/near terra Linda Ridge: 26. We are not opposed to some moderate increase of housing units in the area. However, we have some serious concerns regarding these potential sites: (1) The Lucas Valley / Marinwood area currently has less than roughly 1,750 homes, spread across a roughly 3.5 mile valley corridor, almost all of which are single family dwellings, and the overwhelming majority of which are one or two story homes. There are no large multi-unit apartment buildings in this area. The overall magnitude of the increase in units in this area (2,412 units) is disproportionately large compared to the current housing density of the area. The proposed increase would more than double the overall number of housing units in the area. (2) The area to the south and west of St. Vincent's School (east of HWY 101) has been discussed as a potential development site for some time. Although multi-unit housing could easily be developed there, adding 1,800 units would completely overwhelm the property and this very large number of additional units represents an enormous growth for the area, on the same order of units as currently exist in all of Lucas Valley / Marinwood. To fit this large number of units, the development would likely include large three (or more) story structures, which do not currently exist anywhere in this area. (3) The site at 530 Blackstone Drive (current site of religious house) could easily fit a multi-unit development, however 32 units on this site is far too large for the size of the property, which is near the end of a small half-mile residential street, that currently has less than 50 total housing units. (4) The site at 7 Mt. Lassen Drive (currently two relatively small two-story office buildings) is far too small to fit 58 housing units without the new structure extending to three or more stories. (5) The site at 2 Jeannette Prandi Way (south of the Juvenile Hall) is currently an open space area with a loop path that is regularly used by nearby residents (including residents of the nearby senior housing development) as a recreational walking, bike riding, etc. area (and dog walking area). This open space area has been in existence for well over thirty years and is a very popular area regularly used by many residents of the adjoining neighborhoods. A potential development consisting of 254 units on this site would completely eliminate a treasured and much-used open space area and would likely require a multi-story (three or more stories) structure. Very few of the homes in this area of Lucas Valley / Marinwood are more than one story (almost all are one-story Eichler homes). Such a large development is completely out of character with the current land use in this area and should absolutely not be allowed to be developed on this site. (6) These potential new housing units would represent an extremely large additional burden to traffic density in the area. (7) These potential new housing units would overwhelm the current capacity at our three elementary schools and one middle school. (8) These potential new housing units would create a very large additional demand for water resources in the Lucas Valley / Marinwood area which are currently very limited. The simple number (2,412) of potential additional housing units in the Lucas Valley / Marinwood area is much too large and would represent an approximate doubling of the current housing density in the area. Each of the proposed developments presents issues regarding the size of new structures (including constructing multi-story structures in areas where there are currently none), and would present issues concerning current resource capacities (including traffic, schools, and water). Thank you for your consideration of these issues when making decisions regarding potential new housing developments in the Lucas Valley / Marinwood area.	Email			X	X				X		X				X		

Location	Comment	Source	PCL	INF	SER	TRF	PRK	PTR	ACT	NMR	SEA	NAT	CUL	FIR	WAT	HLT	EQT	GDL
Lucas Valley / Mt. Muir Court	(Comment edited for length) The Lucas Valley Homeowner's Association represents 538 homes in the special R-1:B-LV zoning track in Upper Lucas Valley. We, the Board of Directors of the LVHA, would like to give our support for the efforts to increase housing in Marin County, and offer the following input. To begin with, our State Governor's Housing Plan incentivizes housing in urban centers near transportation and services, to reduce reliance on vehicles and their carbon footprint. If the County chooses a path contrary to the State Plan, and not utilize State funding incentives for urban development, then we ask for a reevaluation of the housing sites identified for our Lucas Valley/Marinwood area. As outlined below, areas 1 - 3 are both contrary to the RHNA requirements and pose a danger for emergency evacuations. There are several sites identified as potential home building sites in our area. 1. Lucas Valley Road / Mt Muir Court 2. Juvenile Detention Center/Jeanette Prandi Way 3. 7 Mt Lassen 4. 530 Blackstone Dr 5. Marinwood Market area. We agree that the Marinwood Market area is a suitable site. It is close to freeway access and has sufficient infrastructure in place, including amenities like food and gas, and can easily absorb new development. Ironically, the relative quantity proposed/identified at this site is comparably less than the quantity for site #2 above, which is a much less suitable site as shown in following comments. There are several factors that make areas 1 - 3 only marginally suitable for new building sites, and therefore should, at best, be only allowed limited building. Factors include: High Wildfire Risk - Single Limited Evacuation Route. Water Shortages. Lack of Infill Infrastructure. Building Atop Unmarked Graves. Zoning Restrictions: The special zoning district for Upper Lucas Valley (R-1:B-LV) limits most buildings to a single story. The district was created in order to adhere to the architectural vision and design aesthetic of Joseph Eichler, a renowned architect highly influential in modern architecture. The existing low income senior living homes on Jeanette Prandi Way are likewise single story. If a housing development is allowed near the Juvenile Detention Center site, 7 Mt. Lassen, or Muir Court, they would have to be single story to maintain the character of the surrounding architectural landscape. This would limit the number of units allowed at these sites. Juvenile Detention Center: The concept of constructing multi-family housing at or adjacent to the Detention Center poses challenging logistical and feasibility issues. The County's attempts to reduce juvenile incarceration has been largely successful; however, not to the point where closure of the facility is possible. Marin County's criminal justice program continues to call for incarceration of violent youth offenders, and does not currently have an alternative detention facility. Consequently, any new housing at the Jeanette Prandi location would be adjacent to the Detention Center. It may be quite difficult to convince a developer to invest in a location where part of the "selling pitch" to residents is proximity to a detention center, particularly given that the facilities at Juvenile Hall are in major disrepair. Long History of Racial Parity. Among the factors the County is reviewing in selecting sites is historical discrimination. Our community has no such history and should not, therefore, be a priority for desegregation. Unlike many restrictive covenants in other neighborhoods in Marin County and across California, our CC&Rs have never contained language restricting homeownership based on race, creed, color or religion. Our community celebrates diversity, and we want to make clear we have no history of resisting it. Indeed, it has been reported by original LVHA members that our community attracted a large number of buyers of Asian descent as it was one of the few areas that they were not discriminated from buying into. Locating Housing Near Services and Transportation: The Board of Supervisors affirmed several principles for deciding potential Housing sites and distribution in 12/2021. The potential Housing sites listed for the Lucas Valley communities seem to ignore the mandate for locating housing near services and transportation. The Lucas Valley Community believes the County should be practical and realistic in identifying sites to satisfy the RHNA requirements that do not create a danger to existing communities, will actually serve the goals of the housing mandate, and that show homage to our beautiful and historically significant community. We respectfully request the County to rethink its "rural" VS "urban" housing development plans in light of the State's most recent Urban Housing strategy and funding incentives.	Email (See Email Comments Received.PDF, pp. 173-178)		X		X				X		X	X	X	X		X	
Lucas Valley, Grady Ranch Development	Addendum to LVHA Housing Statement: EIR Traffic Impact Report Needed For Emergency Evacuations on Lucas Valley Road. The recent wildfire emergency evacuation of Upper Lucas Valley in 10/12/21 caused a logjam of traffic on the only road out, the 2-lane Lucas Valley Road. It has belatedly been brought to our attention that the Grady Ranch development, currently in works (224 housing units), also has Lucas Valley Road as their only exit in a wildfire emergency. When the units are complete, they could add another 300 - 500 cars in an emergency (footnote 1 below). Adding even hundreds of more vehicles onto Lucas Valley Road from the 338 new potential housing units projected, could prove disastrous (footnote 2 below). In addition, any traffic study in an EIR report would also have to take into consideration the potential for a significant number of ADU housing units within the corridor. Lucas Valley Road already seems to have all the traffic it can handle during an emergency evacuation. The LVHA would therefore request that a traffic study be done in advance of earmarking any significant number of additional housing units along the Lucas Valley Road corridor.	Email				X				X				X				
Lucas Valley, Mt. Muir Court	Thank you for taking time to read over my thoughts on the new housing developments proposed for Jeanette Prandi Way, Mount Muir Court, Marinwood Plaza and 7 Lassen. As a Marin County native of 58 years and a Lucas valley resident of 26 years, I am surprised that these projects are so close to approval without adequate community outreach and input. There are many items of concern that I don't feel have been adequately answered for me to support these developments. At this time I am strongly opposed to these developments. I am respectfully requesting more time for our community to better understand these proposals and how we can collaboratively help the County solve its low income housing challenges.	Email																
M - 1 St Vincents Drive(St. Vincents)	I am extremely perturbed that plans are being made to build housing in within the wetlands and flood zone contained in the old Silveira ranch and St Vincent's properties. This wetlands will become increasingly important as the sea level rises and flood zones will be even less inhabitable year round. This will leave any housing there soon uninhabitable but some builder richer and some county officials who only went through the motions of actually providing affordable housing. This issue was already explored and sanity prevailed in leaving the wetlands to be wetlands. Any housing, affordable or otherwise, should be built on appropriate land, not a flood zone which will damage any housing built on it.	Email									X						X	
M - 1 St Vincents Drive(St. Vincents)	I am writing to urge you NOT to approve the Marinwood/Lucas Valley sites under consideration to satisfy the Association of Bay Area Governments Regional Housing Needs Allocation Plan. Developments at these six sites (St. Vincent's School, Marinwood Market, 530 Blackstone Drive, 7 Mt. Lassen, 2 Jeannette Prandi Way, and Lucas Valley Road near Terra Linda Ridge) would result in more than 2300 housing units. While I know that some of the proposed housing is intended for teachers and other critical workers and for low income housing, both of which are important and necessary, it seems like too much development for the infrastructure of this small area. Additionally, all of these proposed development sites are within the Miller Creek School District boundaries and the unfunded impact of these developments on the District would be disastrous. Since the District is currently funded using a Basic Aid Model, it gets no per pupil funding. This means that all the additional students these developments generate will not result in additional funding for the District.	Email		X	X					X							X	
M - 1 St Vincents Drive(St. Vincents)	I found the online tools for commenting cumbersome and inscrutable, and much too time consuming to use. So, the following are my comments about specific housing allotment recommendations in Marinwood Lucas Valley. St Vincent's School - 1800: NO Because there is little infrastructure at St. Vincents, including access to schools and public transportation, this is a poor site for development. Certainly not 1800 units which is an entire community. The only housing at St. Vincents should be limited to students (dorms) and staff.	Email		X	X			X		X								
M - 1 St Vincents Drive(St. Vincents)	I hope that the Marinwood Plaza/market site is again under consideration for housing. As you most likely know, some 15 years or so ago, the community shot down an excellent proposal from Bridge Housing. Except for the market, the property remains a derelict eyesore. Many of us in Marinwood would like to see the property improved, including a modest amount of housing development, along with community amenities such as a coffee shop, brew pub, or other gathering place, and other shops such as hair salon, co-working space, etc. It is close to public transportation, schools, and major employers most notably Kaiser. It's a far superior site for development than the St Vincents property which has myriad sea level rise and other environmental challenges, and very little other infrastructure. I hope the property will be on be on tomorrow's meeting agenda.	Email		X							X	X						
M - 1 St Vincents Drive(St. Vincents)	I oppose 98 houses on the 50 acre High School property facing Drake Blvd. in the San Geronimo Valley. .West Marin is maxed out on development because of fire concerns, small roads, septic. The proposed development at the west side of whites hill is the headwaters of the Lagunitas creek which is our coho salmon nursery. It's a floodplain and is unsuitable for development. The infrastructure needed for a development would harm our fragile ecosystem. If Marin County decides to do what the State is demanding, then why not put the entire buildout on the St. Vincents property which is right next to the freeway and could handle the increase in population. We would like to see all the building be for homeless and low income people - like all the people who commute from Vallejo and Richmond to serve us daily because they can not afford to live in our county. Many other properties in Marin would be more suitable.	Email															X	X

Location	Comment	Source	PCL	INF	SER	TRF	PRK	PTR	ACT	NMR	SEA	NAT	CUL	FIR	WAT	HLT	EQT	GDL
M - 1 St Vincents Drive(St. Vincents)	I oppose a housing development the 50 acre High School property facing Drake Blvd. in the San Geronimo Valley. .1. West Marin is maxed out on development because of fire concerns, small roads, septic. 2. The proposed development at the west side of whites hill is the headwaters of the Lagunitas creek which is our coho salmon nursery. It's a floodplain and is unsuitable for development. 3. The infrastructure needed for a development would harm our fragile ecosystem. 4.Building would ruin agricultural, rural beauty which is so precious to the San Geronimo Valley. 5. If Marin County decides to do what the State is demanding, then why not put the entire buildout on the St. Vincents property which is right next to the freeway and could handle the increase in population. We would like to see all the building be for homeless and low income people - like all the people who commute from Vallejo and Richmond to serve us daily because they can not afford to live in our county. Or work with the state to move San Quentin out to a more appropriate place for a prison such as barren land in the dessert, and make a beautiful development on the waterfront right next to shops and the ferry and the Richmond Bridge which would be easy access to transportation and would not overburden Sir Francis Drake which is already far too congested. Many other properties in Marin would be more suitable.	Email										X					X	X
M - 1 St Vincents Drive(St. Vincents)	I see the maps and have concerns that things aren't matching. Then two of the sites are still contaminated from the former cleaners at Marinwood Market Plaza - St. Vincent's and Marinwood Market Plaza. So what happens with the housing planned in these locations?1936 units?	Email														X		
M - 1 St Vincents Drive(St. Vincents)	I think we should spend our time, energy and money on housing the homeless and low income people at the property near St. Vincents just south of Novato. As you may have noticed, people who work in our communities, but can not live here because of the cost, commute from Richmond and Vallejo and we see the traffic jams every day at commute times. I have heard of a toll coming for Hwy 37, making it even more costly for people who can not afford to live here.	Email																X
M - 1 St Vincents Drive(St. Vincents)	I'm taking this opportunity as a resident of Upper Lucas Valley in Marin to voice my views/concerns about the housing sites under consideration in my area: In general: I don't know what constitutes median vs low income, but in general I support add'l housing strategically placed and sensitively designed (to minimize negative impact on the environment and established communities) for essential workers such as school teachers, sheriff, police & fire dept and hospital staffers, many of whom currently commute long distances to work in the areas they serve. I'd like to see new homeowning opportunities (at below market rates) made available to these workers, as building more high-priced rental units serves no one but property owners.Sites under consideration in the Marinwood/Lucas Valley areas: St Vincent's School – 1800; Marinwood Market – 136. These are both logical, less problematic sites for development, as they are walkable to the GG bus stop at/near Miller Creek & Marinwood Aves, with quick, easy access to the 101 fwy. I really hope to see sensitive urban planning on the St. Vincents site, so the beautiful open space currently grazed by cows does not become yet another soulless jungle of buildings standing shoulder to shoulder facing the freeway. Speaking as someone who's actually rooting for the Smart Train to not only survive, but thrive: part of any development of these sites should include a bike path/paths to connect either or both to the Civic Center Smart station. And/or a shuttle bus (it's too long to walk for commuters).530 Blackstone Drive (site of religious house) – 32. I've no knowledge/opinion re: this site. 7 Mt Lassen (site of office park) – 58. 2 Jeannette Prandi Way (site of Juvenile Hall) – 254. My husband & I currently rent an office at 7 Mt. Lassen, so it's news to us that this site's under consideration. It's a beautiful, unique office setting that serves both the Upper and Lower Lucas Valley communities as a place of business to walk to! I'd hate to see that disappear!!! However, I wouldn't be adverse to seeing a portion of the current 7 Mt. Lassen structures converted to work/live spaces, if sensitively planned. Maybe 30%. My comments re: St. Vincents also apply to Jeannette Prandi Way. As long as new development is against the hills with access via Idylberry Rd, away from Lucas Valley Rd, and sensitively planned, I'm not totally adverse to new development. However the # of units proposed is too high!** Lucas Valley Rd/near terra Linda Ridge: 26. I don't know exactly where this is, but in principle I'm against it. **The problem with all new development close to Lucas Valley Rd is not merely degradation of the scenic route of LVR — but more importantly, adding traffic congestion to a wildfire interface area with a single ingress/egress. I'm an LVHA block captain, and was present and part of the fire evacuation on Sept 1st 2021... a learning experience. It's for this reason that I signed the petition against development in Lucas Valley. I believe that the current Northgate Mall could and should be a site for mixed-use development including low-to median income housing, yet is not on this list of proposed sites. It ticks all the boxes for access to transportation, schools, shopping, etc.	Email				X	X		X	X		X		X			X	X
M - 1 St Vincents Drive(St. Vincents)	I'm writing to express concern about the proposal to put 1800 units of new housing at St Vincents in Lucas Valley. This number is incredibly high - it would overwhelm the Miller Creek School district. There are many other sites proposed in Lucas Valley. I'm not saying no to all of them, but this has got to get more reasonable. Please don't destroy what is now a beautiful community. Marinwood is a special place. We can't absorb all this housing - some please, but nowhere close to the number of units proposed.	Email			X					X								
M - 1 St Vincents Drive(St. Vincents)	Public Feedback - Marinwood/St Vincents housing proposal: I was only recently made aware of the current preliminary proposal for housing allocation to the unincorporated areas of marin county. As a current resident who grew up in Marinwood Lucas Valley - left the county - and returned to raise my family here - I cannot more strongly oppose the sheer volume of proposed housing for the Marinwood/Lucas Valley areas. This location (Marinwood/Lucas Valley) is already underserved by commercial services and has a lack of job opportunities. It is a small bedroom community sandwiched between the commercial hubs of San Rafael and Novato. Any significant shopping or professional services require a vehicle trip to either the city of San Rafael or to the city of Novato. The added burden of the new development proposals would grossly increase the negative environmental impacts that the lack of nearby commercial services already causes. Furthermore the 101 interchanges both North and South already can barely handle the traffic that exists. More housing in this area without addressing current school campus, sport field, open space, park and community center availability and other critical services would have a significant negative impact on the community and not balance the Supervisors stated goal of 'equitable distribution' throughout the county. The schools within the Miller Creek School District are also nearly at capacity. Many of the campuses operate with nearly a third of classrooms being in 'portable' classrooms and have had to take over outdoor recreation areas for portable classroom locations. Our youth sports also already operate at a deficit of field/court availability relative to the active youth that participate. I urge the planning department and the board of supervisors to re-evaluate the Marinwood/Lucas Valley area and not look to force nearly 60% of the county's unincorporated housing allotment into our small bedroom community.	Email				X	X					X			X				
M - 1 St Vincents Drive(St. Vincents)	This letter is in regards to the proposed site and distribution of housing in the Lucas Valley/Marinwood area. While I feel this area can support some expansion, the amount proposed by the county is overwhelming. Per the board of supervisors principles, please note my feedback below. 1: Ensure Countywide Distribution: The majority of housing in unincorporated Marin County is being distributed to Marinwood/LUCAS VALLEY. This does not appear to be an equitable distribution and will potentially double the population of this area, affecting all services- sheriff, fire, schools, traffic, etc. Marinwood/LUCAS VALLEY area is being considered for a majority of this housing in unincorporated Marin: St Vincents: 1800 Marinwood Market: 136 Blackstone (site of religious house): 32 Mt Lassen/deli: 58 Jeanette Prandi/Juvi: 254 Lucas Valley Rd/near terra Linda Ridge: 26 Total: 2306. (This could be up to 60% of the total housing for unincorporated Marin) Households in Marinwood/LUCAS VALLEY currently 2412. (This could potentially double our size)	Email		X	X	X				X				X				
M - 1 St Vincents Drive(St. Vincents)	This letter is in regards to the proposed site and distribution of housing in the Lucas Valley/Marinwood area. While I feel this area can support some expansion, the amount proposed by the county is overwhelming. Per the board of supervisors principles, please note my feedback below. 1: Ensure Countywide Distribution: The majority of housing in unincorporated Marin County is being distributed to Marinwood/LUCAS VALLEY. This does not appear to be an equitable distribution and will potentially double the population of this area, affecting all services- sheriff, fire, schools, traffic, etc. Marinwood/LUCAS VALLEY area is being considered for a majority of this housing in unincorporated Marin: St Vincents: 1800 Marinwood Market: 136 Blackstone (site of religious house): 32 Mt Lassen/deli: 58 Jeanette Prandi/Juvi: 254 Lucas Valley Rd/near terra Linda Ridge: 26 Total: 2306. (This could be up to 60% of the total housing for unincorporated Marin) Households in Marinwood/LUCAS VALLEY currently 2412. (This could potentially double our size)	Email		X	X	X				X				X				
M - 1 St Vincents Drive(St. Vincents)	This letter is in regards to the proposed site and distribution of housing in the Lucas Valley/Marinwood area. While I feel this area can support some expansion, the amount proposed by the county is overwhelming. Per the board of supervisors principles, please note my feedback below.3: Encourage Infill and Redevelopment Opportunities; St Vincents is a large undeveloped area that could likely support some housing, but 1800 units does not limit building on open land.	Email								X		X						

Location	Comment	Source	PCL	INF	SER	TRF	PRK	PTR	ACT	NMR	SEA	NAT	CUL	FIR	WAT	HLT	EQT	GDL
M - 1 St Vincents Drive(St. Vincents)	This letter is in regards to the proposed site and distribution of housing in the Lucas Valley/Marinwood area. While I feel this area can support some expansion, the amount proposed by the county is overwhelming. Per the board of supervisors principles, please note my feedback below.3: Encourage Infill and Redevelopment Opportunities; St Vincents is a large undeveloped area that could likely support some housing, but 1800 units does not limit building on open land.	Email								X		X						
M - 1 St Vincents Drive(St. Vincents)	We have seen the preliminary list of potential housing sites for Marin County, including in unincorporated areas such as Marinwood/Lucas Valley, as developed by the ABAG (Regional Housing Needs Allocation Plan), and approved by the California Department of Housing and Community Development. The plan includes 2,412 units within the Lucas Valley / Marinwood area (accounting for 68% of the 3,569 units within unincorporated Marin County). Sites under consideration in the Marinwood / Lucas Valley areas: St Vincent's School - 1,800; Marinwood Market – 136; 530 Blackstone Drive (site of religious house) - 32 7; Mt Lassen (site of office park) – 58; 2 Jeannette Prandi Way (site of Juvenile Hall); 254 LucasValley Rd/near terra Linda Ridge: 26. We are not opposed to some moderate increase of housing units in the area. However, we have some serious concerns regarding these potential sites: (1) The Lucas Valley / Marinwood area currently has less than roughly 1,750 homes, spread across a roughly 3.5 mile valley corridor, almost all of which are single family dwellings, and the overwhelming majority of which are one or two story homes. There are no large multi-unit apartment buildings in this area. The overall magnitude of the increase in units in this area (2,412 units) is disproportionately large compared to the current housing density of the area. The proposed increase would more than double the overall number of housing units in the area. (2) The area to the south and west of St. Vincent's School (east of HWY 101) has been discussed as a potential development site for some time. Although multi-unit housing could easily be developed there, adding 1,800 units would completely overwhelm the property and this very large number of additional units represents an enormous growth for the area, on the same order of units as currently exist in all of Lucas Valley / Marinwood. To fit this large number of units, the development would likely include large three (or more) story structures, which do not currently exist anywhere in this area. (3) The site at 530 Blackstone Drive (current site of religious house) could easily fit a multi-unit development, however 32 units on this site is far too large for the size of the property, which is near the end of a small half-mile residential street, that currently has less than 50 total housing units. (4) The site at 7 Mt. Lassen Drive (currently two relatively small two-story office buildings) is far too small to fit 58 housing units without the new structure extending to three or more stories. (5) The site at 2 Jeannette Prandi Way (south of the Juvenile Hall) is currently an open space area with a loop path that is regularly used by nearby residents (including residents of the nearby senior housing development) as a recreational walking, bike riding, etc. area (and dog walking area). This open space area has been in existence for well over thirty years and is a very popular area regularly used by many residents of the adjoining neighborhoods. A potential development consisting of 254 units on this site would completely eliminate a treasured and much-used open space area and would likely require a multi-story (three or more stories) structure. Very few of the homes in this area of Lucas Valley / Marinwood are more than one story (almost all are one-story Eichler homes). Such a large development is completely out of character with the current land use in this area and should absolutely not be allowed to be developed on this site. (6) These potential new housing units would represent an extremely large additional burden to traffic density in the area. (7) These potential new housing units would overwhelm the current capacity at our three elementary schools and one middle school. (8) These potential new housing units would create a very large additional demand for water resources in the Lucas Valley / Marinwood area which are currently very limited. The simple number (2,412) of potential additional housing units in the Lucas Valley / Marinwood area is much too large and would represent an approximate doubling of the current housing density in the area. Each of the proposed developments presents issues regarding the size of new structures (including constructing multi-story structures in areas where there are currently none), and would present issues concerning current resource capacities (including traffic, schools, and water). Thank you for your consideration of these issues when making decisions regarding potential new housing developments in the Lucas Valley / Marinwood area.	Email			X	X				X		X			X			
Muir Woods Lodge (Tam Valley)	After much thought and consultation with some neighbors, I'd like to submit the motel that is across from the Holiday Inn – the Muir Woods Lodge – as a possible housing site. You may know that the previous motel next door – with the big sign that says “Fireside” was converted to housing some years ago. If the Muir Woods Lodge is similarly converted, it would not create much additional traffic, as the patterns are already established.	Email																X
Nazareth House (San Rafael)	Additionally, there are also at least two other projects (the 670-unit Northgate and 100-unit Nazareth House developments) which are within our school district but not in unincorporated Marin. Likewise, neither of these developments, both within the Miller Creek School District, will generate per pupil funding for either the Miller Creek K-8 schools or the San Rafael High School district. That means that even though there will be many more students to serve, there will be no additional funding with which to do so. Additionally, these developments generate little to no parcel tax money and some are even exempt from the meager development fees which means the District would receive no money at all to build additional classrooms or to hire additional teachers to serve all the additional students that would be generated.	Email			X													
No Location Specified (Countywide)	All should be near public transportation and shopping. Walking is good for all of us	Email						X	X									
No Location Specified (Countywide)	Any & all housing proposed in Marin county should be near public transportation and shopping. Adding additional cars to the area doesn’t make environmental sense so low cost housing should be in convenient locations	Email			X			X										
No Location Specified (Countywide)	Any and all housing sites should consider availability of public transportation and availability of services, ie, grocery stores and pharmacies. It makes no sense to put any housing in out of the way sites where more cars are put on the road. Housing closer to hwy 101 is appropriate.	Email			X			X										
No Location Specified (Countywide)	As I am sure, many of our concerns may have already been asked but there is a need better communicate the information to the community. The follow are questions/ concerns: Who performed the study to identify potential areas for the housing sites? What determines the income used for each Housing category (ie local income, county income, housing prices)? How will residence commute from there new homes? Mass/public transportation? Where will retail commerce be located? Will the county exercise Eminent Domain Power? Effect to local taxes, for local bond issues created as a result increased population (Schools, roads, sewers, law enforcement, fire protection …. other county servicers)?	Email		X	X			X						X	X		X	
No Location Specified (Countywide)	I am responding to the request to voice my opinion of where to build 3,569 additional housing units in unincorporated Marin. If this is not the proper email address, please forward the appropriate one to me. My concern is not WHERE to put additional housing, but where WATER resources will come from. We have been under drought and water conservation regulations for more years than not in the past 10 years alone. Why would Marin consider building ANY new homes when there are not enough resources for those that are already here? Also, with the State allowing easy addition of ADUs on existing properties, it appears that some housing needs will be unwittingly filled that way (along with additional strain on resources)	Email				X									X			
No Location Specified (Countywide)	I am urging you to not proceed with the presently proposed Housing Element plans in incorporated Marin County. While affordable housing is a concern, so is sustainability. I do not believe the current plan balances these needs adequately. Please allow time for a more thoughtful discussion with more public engagement before proceeding.	Email										X						
No Location Specified (Countywide)	I am very concerned about the large number of homes that the state is requiring Marin to build, with no local control. We are already short of water. Where do they think we will the supply for more homes. As a minimum any new building should only be done with companion infrastructure improvements to handle it such as water, traffic, local schools, etc. I believe there should be push back to the state legislature regarding push to urbanize many parts of our county without thought or planning for the effects of such building.	Email		X	X	X				X					X			
No Location Specified (Countywide)	I do not think there should be housing put into rural meadows but should concentrate on areas that are near existing commercial or developed areas that are not being used. Why change Marin to be like other congested counties that have houses Everywhere willy-nilly and people have to have cars and use gas to get anywhere they need to go? Marin County has a beautiful and peacefulness in the open meadows and hillsides. Please don't jeopardize the county by putting the housing along open space meadowlands and hillsides.	Email										X						
No Location Specified (Countywide)	I find your proposals rushed and not well thought out. I am in favor of taking a more thoughtful and balanced approach.	Email																

MARIN COUNTY HOUSING ELEMENT: CANDIDATE HOUSING SITES AND SELECTION PROCESS
COMMENTS RECEIVED VIA EMAIL

Location	Comment	Source	PCL	INF	SER	TRF	PRK	PTR	ACT	NMR	SEA	NAT	CUL	FIR	WAT	HLT	EQT	GDL
No Location Specified (Countywide)	I fully support measures to increase housing in Marin County, especially those targeted for low income housing. I reject the disguised racism and NIMBY attitude present among naysayers, even if it were to depress my own home's value. I support both racial and economic diversity as a strength of our community. It's unconscionable that wealthy Marin residents want the best schools, but don't want low paid teachers to be able to afford to also live here. This goes double for housecleaners, yard workers, and other very low wage workers who have to spend a significant portion of their income commuting. Let's stand up to the madness of a vocal few and do the right thing.	Email															X	
No Location Specified (Countywide)	I like how an unelected board (ABAG) comes up with this huge number and threatens the county with a big stick. Never mind the additional water resources that would be needed for all these new residents in a drought prone area.	Email													X			
No Location Specified (Countywide)	Marin Housing authority, It seems like the enthusiasm to push this through the County is ignoring a grievous situation. Already, even with water limitations, the County is poorly prepared to grow without greater water resources. This is truly the 'elephant in the middle of the room'. No expansion on this scale can possible be discussed without responsible delivery of adequate water. Thank you for considering my voice.	Email													X			
No Location Specified (Countywide)	My primary concern is the same one I always have: how will increasing housing affect the environment? A number of sites would require cutting down trees or building close to streams. We need MORE trees, preferably native oaks, to protect soil, reduce moisture loss, & provide shade. Open space is NOT wasted space. Talking about affordable housing sounds good, but I keep seeing huge vanity houses being built. There's a 4,000 ft2 just down the road from me that stands empty most of the time. All that construction required scarce building materials and created lots of air & noise pollution. Is slapping an affordable-housing tag on these projects just another sneaky way for people to invest in real estate? How does packing people into fire-prone areas make sense? What about drought and the impact of more construction & people? Why not buy back or forbid the ownership of 2nd & 3rd homes? Why not build housing in strip malls? Disrespecting the environment is how we got into this mess.	Email										X		X		X	X	
No Location Specified (Countywide)	My view is that the changes proposed will change the character of this lovely region	Email										X						
No Location Specified (Countywide)	The county of Marin has reached peak density due to water and transportation constraints. Minimal new housing should be constructed in Marin County. The housing problem is a statewide problem and it should be addressed at the state level. New cities should be constructed along the Hwy. 5 and 99 corridors near the planned high speed rail lines. The state also needs to build treatment centers for the mentally ill and the drug addicted individuals that are currently living on the streets. These centers can also be placed where land and resources are less expensive. The current uncoordinated county by county plans will only decrease the quality of life and increase expenses for all.	Email			X	X		X		X					X		X	
No Location Specified (Countywide)	We are being asked to find housing numbers 19x what we were asked in the last planning cycle. Why? If this is because ABAG is, once again trying to tie Marin housing numbers to SF through their "sphere of influence" concept, this has already been disproven, since Marin is not a bedroom community to SF. ABAG needs to understand that they cannot just wave their magic wand, and buildable lots appear! Affordable Housing needs are real, and Marin has been a very expensive place to live, both in housing costs and in cost of food, gas and everything else, so we are not a very affordable place to live, even once housed. ites with sea level rise issues should not be considered for new housing. Period. Building housing for the disadvantaged in these areas is not social justice, or even good planning. Parking on site is a must in Marin, regardless of any loopholes in SB9. Especially on the hills, where the streets are sub-standard, parking on the streets has already created impossible access for fire and other emergency vehicles, or even 2-way traffic. This has been caused by the County neglecting to demand the roads be improved before development went in. These are death traps in the event of the fire we know will come some day! Planning has allowed development to continue on substandard roads, particularly on hills. This poor planning has created fire traps throughout the county that people will not be able to evacuate from. These sites should also not be further developed, especially for those in need, without adding the infrastructure that will insure the safety of the residents, ie adequate roads that can handle an evacuation. Other infrastructure needs to be updated to handle increased demands, such as sewers, to meet the unplanned expansions mandated by SB (How will we meet these and who pays for these? While we are planning for housing for those who are not already residents, how are we planning to meet the needs of the residents? Re: sea level rise impacting existing housing and major roads, and fire. While we are redesigning these we may have opportunities to find new housing sites. I hear the Strawberry Seminary has sold its property. There is a vast opportunity for any kind of housing to go there. This is well above sea level and wide open. I am wondering how many affordable units are going in there, where there is so much space to build? The old San Geronimo Golf course is another site that is wide open, though further from town Cost of land is higher here than most other places, plus the cost of building materials is high. Marin has World Class scenery that is enjoyed by everyone in the Bay Area, and beyond. We have a responsibility to our environment that other counties do not. We also have a high amount of traffic going to west Marin, and Muir Woods is the most visited National Park. Neighborhoods where traffic is already gridlocking poses problems for emergency vehicles, and should be carefully evaluated before increasing density. I do not believe we can ever build enough Affordable Housing to fill the demand of everyone who wants to live here. The main cause of housing crises is that wages have not kept up with housing costs, effectively keeping out anyone who is not wealthy. This disproportionately locks out people of color. Since Marin is effectively "built out", we should be looking at infill housing San Rafael's Canal area was built a long time ago with lightly built apartments. These nave been heavily used and probably are about to need replacing. This whole area probably need to be redeveloped with plenty of opportunity for affordable housing. With so many people working from home, we have the opportunity to repurpose office buildings Same with shopping centers. Novato has many that could be redone. Since state monies that pay for Affordable Housing, anyone from anywhere in the state is eligible for housing built here, as I have heard. We have Buck $$. Marin should be building housing for teachers, healthcare workers, fire fighters and police that can be designated for members of our own community. Remodeling existing apartments or turning existing into apartments, instead of always building new. I am all for more affordable housing. I was a single mom of 2 in Marin, for 20+ years and I know first hand how difficult it is to survive here if you are low income. It just is not set up for that, and haas continued to get more expensive. I never saw a dime of assistance from Buck, so I very much doubt it is being used to help the poor, as it was intended. We should use this to help, as outlined above. Ask the State for some of its surplus $$ to reestablish the school bus system. Ditto for low lying roads/utilities, etc. Almost 30% of traffic AM/PM is from parents driving their kids to/from school Increase access to affordable child care along with housing. I would welcome an opportunity to work on a brainstorming committee to come up with new housing strategies system.	Email		X		X	X				X	X		X	X		X	
No Location Specified (Countywide)	We are being asked to find housing numbers 19x what we were asked in the last planning cycle. Why? If this is because ABAG is, once again trying to tie Marin housing numbers to SF through their "sphere of influence" concept, this has already been disproven, since Marin is not a bedroom community to SF. ABAG needs to understand that they cannot just wave their magic wand, and buildable lots appear!	Email																
No Location Specified (Countywide)	We should not be approving any more new developments without increasing our water supply.	Email													X			
No Location Specified (East Marin)	Please keep the housing developments in east Marin as our beloved former politicians planned in the early 1960's as detailed in the documentary "Rebels with a Cause".	Email										X						
No Location Specified (San Geronimo and Nicasio)	Dear Board of Supervisors, I am writing to thank you and the County staff for the outstanding work you have been doing on the new Housing Element for Marin County. I especially appreciate the community education and outreach by the County to actively engage residents during these past few months. The workshops on the Housing Element and the Balancing Act tool offered important information on the unmet need for affordable housing and also the criteria that could to be used as guides in the decision-making process. I also want to thank Leelee Thomas and the entire Community Development Agency staff for the virtual workshop on February 16th for unincorporated West Marin. More than 100 people attended, many with purposeful, well-informed questions. Leelee and staff responded to all of the questions in a knowledgeable, meaningful and insightful manner. In addition to housing sites, It was good to hear that County staff are working to try and find solutions to some of the most vexing issues that impede and discourage the creation of affordable homes: septic issues, waste treatment and grey water systems, and building code and zoning restrictions. I very much appreciate your dedication and support of affordable housing in Marin. We all have a lot of work to do. Attached are my ideas about possible sites for affordable housing sites in the San Geronimo Valley and Nicasio. (Note: attachment apparently not included)	Email															X	

MARIN COUNTY HOUSING ELEMENT: CANDIDATE HOUSING SITES AND SELECTION PROCESS
COMMENTS RECEIVED VIA EMAIL

Location	Comment	Source	PCL	INF	SER	TRF	PRK	PTR	ACT	NMR	SEA	NAT	CUL	FIR	WAT	HLT	EQT	GDL
No Location Specified (San Geronimo Valley?)	Increasing the potential for 200+ more cars getting through the SFD corridor during rush hour? Traffic is already a nightmare morning and night. Adding houses to a community struggling to maintain homeowners insurance due to wildfire vulnerability? This is really poor thinking and poor planning. I support seeking SOME alternative Valley sites to meet our affordable housing obligations but there are possibilities along the 101 corridor that make much more sense. Please think forward instead of short sightedly.	Email				X								X				
No Location Specified (West Marin)	I agree with and adopt as my own the comments submitted by the Environmental Action Committee of West Marin (EAC), and request that you add my name in support of EAC's position. And additionally, and by all means, Marin County MUST maintain the zoning (A-60) and all other policies designed to protect and enhance agriculture in West Marin. (Note: unable to identify EAC comments which are referred to.)	Email										X						
No Location Specified (West Marin)	I am extremely concerned about more housing going up in West Marin due to fire danger and the already impossible likelihood of getting out of Marin from West Marin due to the lack of roads to get out. How can more housing be considered when there are only a couple ways out and if traffic in Fairfax is bottled up and the ONLY way out is going east then valley residents are screwed. Housing should only be considered in areas nearest the freeways. The golf course should only be for open space and recreation. Fire danger is a serious threat.	Email				X						X		X				
No Location Specified (West Marin)	In West Marin we are on septic systems. It is horrendously expensive to get anything done here., costing up to $ 100,000 easily for a simple system.Then the County is imposing annual extra fees for people who have non standard systems of any kind. It makes this unfeasible for all but the most wealthy. I and many of my neighbors would be amenable to putting an ADU on our property BUT for the septic issues. There are alternatives - electric toilets, or other things that could be researched. Also, the County must come up with an affordable septic pricing. Plus, the contractors have no incentive to keep their costs in line, even with their proposals. I have heard time and again, how Questa got a bid, must have been the lowest bid, then they went over budget, (by $15, 000 or $ 20,000) and to get the house signed off, approved, and be able to move in, the homeowner paid the extortion, I mean, bill. The County could at least provide a service where homeowners could put their comments in about septic contractors for prospective septic owners to see. Thanks for listening.	Email													X			
No Location Specified (West Marin)	The consideration of this site (275 Olive Avenue) raises a concern that other similarly inappropriate sites may also be up for consideration in other parts of Marin. Would it be possible to get a list of any sites that are within 500 feet of a wetland? I studied wetland habitat restoration planning in graduate school, and was under the impression that CEQA/CWA sect 404 prevented projects from being built on top of or close to wetlands.	Email										X						
Northgate Development (San Rafael)	Additionally, there are also at least two other projects (the 670-unit Northgate and 100-unit Nazareth House developments) which are within our school district but not in unincorporated Marin. Likewise, neither of these developments, both within the Miller Creek School District, will generate per pupil funding for either the Miller Creek K-8 schools or the San Rafael High School district. That means that even though there will be many more students to serve, there will be no additional funding with which to do so. Additionally, these developments generate little to no parcel tax money and some are even exempt from the meager development fees which means the District would receive no money at all to build additional classrooms or to hire additional teachers to serve all the additional students that would be generated.	Email			X													
Novato, Atherton Corridor	Hello. Thank you for the information and materials regarding the Housing Element on the website. I have reviewed all of the materials and have the following questions the answers to which will help me and others comment and provide input in a more informed way. Because of the 1,000 character limit, this is the 1st of 3 emails with 9 total questions. The Draft Candidate Sites Inventory charts you have provided do not break-out extremely low-, very low-, and low-income units. The Housing Element Site Inventory Guidebook under Government Code Section 65583.2 (the "Guidebook") seems to require this, and Marin County's FAQ 15 breaks down the 3,569 total into those 3 categories plus moderate and above moderate. Can you please provide that more defined breakdown of all 5 categories by site? 1. It would be very helpful to have a chart for the Draft Candidate Sites Inventory that lists the units under each of the four scenarios. Is that something you have? Can you please provide it? 2. Under Part A, Step 3 please provide the infrastructure availability or plans for the Atherton Corridor sites. 3. Under Part A, Step 6 please provide the factors considered to accommodate low and very low-income housing for all of the sites. 4. Under Part B, for the Atherton Corridor sites, please provide the evidence that the site is realistic and feasible for lower income housing. 5. Is there a master plan for all of the low-income housing, up to 516 units, for the Atherton Corridor? Does any plan consider sidewalks, traffic lights, parking spaces and public transit? How many buildings and floors on each site are envisioned? 6. Under Part C, the capacity analysis, and in particular Step 2, what were the factors to calculate the realistic capacity of the Atherton Corridor sites including redevelopment of the non-vacant sites? 7. Under Part D, why are the non-vacant sites in the Atherton Corridor considered "obsolete" or "substandard" or otherwise meet the required criteria? 8. Under Part D, Step 3A, what is the basis for finding that the current residential use for the Atherton Corridor sites is unlikely to be continued? I would appreciate your response to my 9 questions in advance of the planned call for the Novato Unincorporated area on February 17.	Email	X	X													X	
Novato, Atherton Corridor	How would you feel if the County identified your home as the possible site for rezoning to accommodate high-density housing but neglected to notify you??? And then justified its inaction as inconsequential because the properties are only under preliminary consideration. That's what happened in the Community Development Agency's Feb. 17 presentation. I call it arrogant, insensitive, high-handed and totally inappropriate. Furthermore, the process of identifying these properties is opaque at best. It is irresponsible to proceed while disregarding the infrastructure necessary to support new homes, particularly in our drought-stressed, fire-endangered landscape. It's not the kind of government that respects its citizens. I am particularly troubled that the planning for the Atherton unincorporated areas ignores the Fireman's Fund 1000-home development in Novato less than a mile away. Dumping 1400 homes into this concentrated area spells disaster and will overwhelm the San Marin-Atherton interchange.* The "Guiding Principles" you adopted in December include "environmental hazards," but they recklessly disregard the practicalities of building on these sites and the adverse impact on the local environment, It's time to go back to the drawing boards and this time develop a reality-based plan that honors your constituents. *Construction of 101 in the Novato Narrows has taken 20+ years! Nothing should proceed until CalTrans is on board with a plan and dollars committed!	Email	X	X						X		X		X				
Novato, Unincorporated	We live in unincorporated Novato and the consensus of my neighborhood is that we do not wish to have our area re-zoned to accommodate low-income housing. What's unique about our area is that we still have some room to support the local wildlife and insects. Since moving here in 2014, we've witnessed a decline in the bee, bumblebee, and butterfly populations. The Monarchs will soon be gone too due to dwindling food resources. They are key to the health of our ecosystem, and every time a property is developed for housing, the plants needed to support these creatures are destroyed. Fencing also hurts the trails and pathways necessary for the animals to get much-needed food and water. We do not want you re-zoning anything. We want to keep our neighborhoods as they are. We already struggle with water issues. Please do not make our areas more accessible for development. We do not want what little beauty is left here destroyed.	Email										X			X			

Location	Comment	Source	PCL	INF	SER	TRF	PRK	PTR	ACT	NMR	SEA	NAT	CUL	FIR	WAT	HLT	EQT	GDL
O - 217 Shoreline Highway (Tamalpais)	(Comment edited for length) Sustainable TamAlmonte has the following comments and recommendations regarding the merits of the above referenced Tam Valley, Almonte, and Manzanita Candidate Housing Sites listed in the 2023-2031 Housing Element DRAFT Candidate Housing Sites List. Due to the unique characteristics of the area, encouraging residential development, especially high-density development, at the above referenced Sites would increase the risk of undue harm to the environment and undue hardship, illness, injury and/or death to the current and future residents. The Tam Valley, Almonte, and Manzanita commercial lowlands, in which the above referenced sites are located, experience the most number of environmental constraints and hazards of any area in Unincorporated Marin. Both the Marin Countywide Plan's EIR and the 2012 Housing Element's SEIR demonstrate that development at these sites would exacerbate the existing dangerous conditions and add new significant adverse environmental impacts (which) magnifies the probability that a tragedy would ensue and the multiple mitigations that a developer would need to fulfill would cause development costs to soar. These factors make the sites unsuitable for affordable housing. The only acceptable course of action is to eliminate the sites from the inventory. Below is a list of the unique natural features, hazards, and limited resources in the Tam Valley, Almonte, and Manzanita lowlands that constrain development and population growth and substantiate our argument. For a quick overview of these constraints, please view the attached table. I. Dangerous Traffic with Unacceptable Level Of Service – LOS "F" Of Local Roadways:. II. Flooding, 100 Year Floodplain, Impending Sea Level Rise III. Filled Marsh Areas With High Seismic Activity, Liquefaction, Subsidence and Mud Displacement. IV. Air Quality & Noise: Increased Risk of Residents Developing Serious Illness Due to Living Near Major Roadways. V. Hazardous Materials: For additional information regarding potential health impacts to workers and future residents who may be exposed to hazardous soil conditions, related to past uses, in Tam Junction and Manzanita, please follow the below link to read the comment letter by Technical Expert Matt Hagemann. VI. Endangered Special Status Species. VII. Insufficient Services & Public Transit. VIII. Historic Wetlands and Baylands Corridor. IX. Historic Marshland That Could Be Restored. 160 Shoreline Hwy and 260 Redwood Hwy Frontage Rd. are historic marshland. X. High Density Development Is Not Consistent With the Traditional Character Of The Local Semi-Rural Communities. Conclusion: The County now has sufficient information to understand that the proposed Tam Valley, Almonte, and Manzanita Sites are inappropriate for inclusion in the 2023-2031 Housing Element Candidate Housing Sites Inventory. Not only would construction of housing on these sites exacerbate the already existing problems but doing so when the County admits in the Marin Countywide Plan EIR and 2012 Housing Element's FSEIR that significant adverse unavoidable impacts would result from such construction defies logic. Moreover, there can be no benefit that would override the impacts of environmental harm and severe illness, injury or loss of life from building on the Tam Valley, Almonte, and Manzanita Candidate Housing Sites, which are laden with environmental constraints and dangerous hazards. The best course of action would be for the County to revise the list to reflect the current problems with traffic, seismic activity, hazardous soil conditions, air and noise pollution, water supply, flooding, and impending sea level rise and to find that no new residential development in the Tam Junction & Manzanita areas is appropriate. Such action would be consistent with the Board of Supervisors' sensible decisions.	Email (See Email Comments Received.PDF, pp. 123-151)	X			X					X	X		X			X	
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O - 217 Shoreline Highway (Tamalpais)	As a concerned Mill Valley resident, I am writing to endorse TamAlmonte's letter to you re. the merits of Tam Valley, Almonte, & Manzanita Draft Candidate Housing Sites. Please think very carefully about sites, due to concerns about flooding, traffic and at times extreme fore danger with needed evacuation routes.	Email				X					X			X				
O - 217 Shoreline Highway (Tamalpais)	ATTACHMENT from Tam Design Review Board: Suggested Additional Policies to be Included in the Housing Element: 1. Wildfire Risk: Use mathematical modeling to investigate and predict wildfire risk. Prohibit the building of housing (even ADUs) in fire critical areas. 2. Flood Risk: Prohibit new housing in areas at risk of flooding from storm surge or sea level rise. 3. Bothin Marsh: Require all new development adjacent to Bothin Marsh to supplement and follow the policies that are designed to preserve the marsh. Given the County's recent efforts to restore and preserve the marsh, it makes no sense to select a site adjacent to the marsh for any form of dense development. 4. Evacuations: Require that new housing development along Shoreline Highway trigger a study and redesign of the traffic patterns to ensure that any new housing development in that area will not worsen traffic or increase the threat to life safety during an evacuation. Any assessment of traffic impacts of emergency evacuation should include new housing developments in the City of Mill Valley, as Shoreline Highway is the only exit should East Blithedale become blocked. 5. Short Term Rentals: Eliminate short-term rentals completely, or allow only on-site, owner-occupied properties to have short-term rentals. If someone does not live on-site, then the property is arguably an investment property only, and any claim of the need for that short-term rental income can be disregarded. This would enable ADUs to be counted toward the Housing Element numbers (see item #10). 6. Vacancies: Create a County mandated vacancy tax (as San Francisco is presently considering) to create disincentives for leaving housing units empty. Exemptions could be made for work from home or dwellings under a certain square footage if the homeowner works from home or needs the space for their own dwelling use. This has been documented to establish new housing units and therefore could be counted toward the housing numbers. 7. Speculative Investment: Eliminate corporate ownership of housing of up to 4 units. This will stop speculative over-bidding of properties (which drives up housing costs) and land banking (which is performed to drive up the value for the investors.) This is crucial for market rate units that do not have controls over ownership. If dwelling units are constructed and snatched up by corporate investors, the goal of increasing availability will not be achieved. If the housing crisis is still occurring after another eight years, the next round of RHNA numbers will be even higher, and even more density will be demanded. 8. Promote Affordability: Require that all lot splits and ADUs rent at affordable rates. This would enable ADUs to be counted toward the Housing Element numbers that are required for affordable units, which are the most difficult to achieve (see item #10). The Planning Department should not look at undersized parcels as a hardship that allows for an exemption to exceed the FAR. Instead, it should be taken as a limitation on the lot that will provide a smaller home, which will ultimately result in a diverse range of housing options and levels of affordability. 9. Conversions: Provide incentives to preserve the existing stock of affordable housing and/or promote the conversion of existing market rate housing to affordable housing. Tam Valley in particular has a large number of rental units which have traditionally been at the affordable end of the rental spectrum, and could readily be maintained as such with the necessary incentives. 10. Alternative Measures: Follow the Housing Element guidelines to promote and locate alternative housing sites as per recommended policies #5, 8, and 9 above. These guidelines state that acceptable dwelling unit numbers can be counted through "the availability of ADUs and JADUs for occupancy, rather than used as offices or guest houses." (p. 30) In addition: "Alternative adequate sites: Under limited circumstances, a local government may credit up to 25 percent of their adequate sites requirement per income category through existing units that will be: substantially rehabilitated in a multifamily rental or ownership housing complex of three or more units that are converted from non-affordable to affordable rental; preserved at levels affordable to low – or very low – income households, where the local government has provided those units with committed assistance." (p. 30)	Email																
O - 217 Shoreline Highway (Tamalpais)	I am in complete support of all the points made in Sustainable Tam Almonte letter of 2/24/22. Building in the proposed area is ill advised, and appears to be illegal.	Email								X	X							
O - 217 Shoreline Highway (Tamalpais)	I am writing to endorse the attached letter from Sustainable TamAlmonte to the Marin County Board of Supervisors and Planning Commission regarding the merits of the proposed Tam Valley, Almonte, and Manzanita Candidate Housing Sites listed in the 2023-2031 Marin County Housing Element DRAFT Candidate Housing Sites List. The need for housing our homeless is desperate but building residential space at Tam Junction is just NOT logical. The idea of building along Shoreling/ Highway 1 is very questionable. It is already a populated area with minimal sidewalks and access to needed resources. Thank you for your consideration of the attached letter	Email	X	X	X	X		X		X	X	X	X	X	X	X		

Location	Comment	Source	PCL	INF	SER	TRF	PRK	PTR	ACT	NMR	SEA	NAT	CUL	FIR	WAT	HLT	EQT	GDL
O - 217 Shoreline Highway (Tamalpais)	We are writing in regard to the sites chosen for possible inclusion into county plans for housing in the Almonte/Tam Valley area of the county. Of the eight sites mentioned in your Balancing Act scenario, five are in a serious flood zone and one is located, not on, but in Richardson's Bay. Your commentary regarding the avoidance of environmental hazards has been completely ignored by whatever staff was used to choose these sites. The properties in the flood zone are 160 Shoreline, assessor's parcel # 052-041-27, 217 Shoreline, 223 Shoreline, and 204 Flamingo Rd. he site which is actually in the bay is 260 Redwood Hwy. Oddly enough, there is one property across the road from 160 Shoreline which is on solid ground. That would be the Muir Woods Lodge, a motel which actually has some open space which could be used for more housing. Why was this property ignored when lesser properties were chosen? Considering that we are familiar with the sites in the Almonte/Tam Valley area but not the rest of the county, it seems very strange that your staff has chosen properties which flood now and will continue to flood even more in the future. We wonder about your motivation in focusing on dangerous and inappropriate land. We also wonder why your staff has chosen properties which are pretty much lumped together in the same area which will further exacerbate the level F traffic problems which occur for us every day. If these sites were chosen to be close to public transportation, we would remind you that there is no viable public transportation in our area. So we would be looking forward to much more daily auto traffic. We are extremely disappointed in the Balancing Act which appears to be a distraction and of no practical value. We wonder how much time and money was wasted on promoting this ridiculous game. We also wonder how many sites in the rest of the county are totally inappropriate but are being promoted as a way to choose our fate which, as you know, is not the case. Surely, the Board of Supervisors can do better than promoting this silly distraction rather than facing what is a serious problem for the future well being of Marin County.	Email				X		X			X							
O - 217 Shoreline Highway (Tamalpais)	We oppose new housing in the areas mentioned in Tam Junction due to flooding and traffic and possible fires, can't get out of here now. Tell Scott Wiener and his friends to move on.	Email				X					X			X				
O - 217 Shoreline Highway (Tamalpais)	Yesterday afternoon, I had the pleasure of speaking with Ms. Clark about the wisdom (actually, the lack of it) in the choice of potential sites around Tam Junction. Last night, I participated in the "roadshow" and, as a result, I am asking for your help in following up on one matter. During the presentation by Jose Rodriguez, he mentioned that one of the "Guiding Principles" for the BOS is the consideration of "environmental hazards". It doesn't take long to recognize the hazards of sea level rise, a long history of flooding and traffic in our neighborhood, among others. But, in addition, Mr. Rodriguez made an interesting rejoinder to a question about whether certain sites can be included in this study if such sites have been previously reviewed and rejected. He was not too clear but he suggested that the State of California has some "requirements" if a previously rejected site is again brought up for analysis. I asked him to specify (1) which of the four Tam Valley sites have already been considered and rejected, and (2) what are the state's requirements (if any)--that are different or additional--that would apply to such sites. He did not have the information available to answer either question and it didn't appear to me that there would be much of an effort to research those questions and disseminate the answers. Hence, this email. Do you know the answers? If not, would you please put in motion an effort to discover the answers? It may not be dispositive, but then again, it may be important.	Email				X					X	X						
P - 4900 Sir Francis Drake Boulevard (San Geronimo Valley)	(Comment edited for length) Please find attached the San Geronimo Valley Planning Group's response to the proposed Housing Element update. Background: The San Geronimo Valley Planning Group was formed in 1972 to help elect Gary Giacomini to the Board of Supervisors in order to gain the critical third vote necessary to kill the 1961 Countywide Master Plan, which had envisioned 5,000 new homes and 20,000 additional residents for the San Geronimo Valley alone. While the plan was updated in 1982 and 1997, its central premise has never changed: preserving our Valley's rural character and protecting our natural environment. This commitment - along with that of many other community members - also helped permanently preserve more than 2,300 acres of open space in our beloved Valley. We have been trying to apprehend the efforts of Marin County to meet the state- mandated "housing elements" through the rezoning of existing parcels. We are very concerned that few Valley residents are aware of the potential impact of this housing mandate on our community and that the Planning Group was not included in the process from the beginning. Apparently, pressure from the State has made it a top- down County effort. The Planning Group adamantly opposes the proposed, potential locations within our community identified below. High school property - We are alarmed by Candidate Housing Site P, the proposal to build 98 above-moderate-income units through rezoning the high school property next to the Ottolini/Flanders' Ranch at the bottom of White's Hill on Sir Francis Drake Blvd. Our Community Plan clearly spells out that the use of this property should remain as agriculture or open space; the high school district agreed. Our reasons are numerous. 1. It would be a visual blight, destroying not only the aesthetics of the entrance to our Valley but also jamming suburbia into the inland rural corridor. 2. It would be a dangerous location, creating a separate enclave with an entrance off a very busy highway, and removing one of the few places where traffic can safely pass slower traffic. 3. Because this property is not within the boundaries of any of our four villages, it would destroy the essence of our Valley's character, creating, in essence, a new, completely separate village of above market-rate houses. Moreover, there is no sewage or water infrastructure at this location. 4. It is an environmentally poor choice, being a wetland area, a swamp in the winter, and within the headwaters of the Lagunitas Creek watershed. Former golf course club house property. Candidate Housing Site R-1. This open space, referred to as the Commons, must remain open space and not also become a "new village" location. In addition to being the likely site for a new firehouse, this is an essential area for community gatherings, and provides needed parking for and access to Roy's Redwoods, Maurice Thorner Open Preserve, and the two, newly conservation easement-protected meadow parcels (former front and back nine). The Planning Group does favor affordable housing in the Valley. We want our residents and their children to be able to afford to remain in our community and to maintain our diverse population. But the current plan seems to be solely a County "numbers game," meeting only the requirements of the State for 3,569 units in unincorporated Marin. The parcels in the Valley are identified for families earning more than $132,000 annually. For an individual, this would be the equivalent of $62.50 an hour. The Valley is a rural community. The minimum wage in California is $14 an hour. Anyone who works a full- time job should be able to afford decent housing. This plan does not provide that. The County must focus on the real need for affordable housing, with more emphasis and incentive on legalizing existing units and making it easier to create second units, ADUs and JDUs. A stronger effort is needed by the County to find appropriate parcels within our existing villages. Potentially, this might include the current location of the County fire department, which, if/when it's vacated, could be an excellent location for affordable multi-family housing. There are others. A time constraint shouldn't be the deciding factor in zoning parcels for housing. There has to be more thought put into this and community involvement shouldn't be limited to a flawed survey. We request the County hold an in-person meeting for the community as soon as possible, preferably in the multi-purpose room at Lagunitas School. Additionally, the Planning Group would like to work with you to find a way to provide more affordable housing units within our community while continuing to maintain and protect the rural character and natural resources that make our Valley such an attractive place to live and raise a family.	Email (See Email Comments Received.PDF, pp. 234-236)			X	X	X			X		X					X	
P - 4900 Sir Francis Drake Boulevard (San Geronimo Valley)	1: can we use the Lagunitas school parcel that is before the Spirit Rock parcel? 2: If Spirit Rock is built on can it be hidden from road? 3: The visual view when you enter the Valley is gorgeous and should be maintained. 4: Lagunitas school campus has lots of unused space.	Email										X						X
P - 4900 Sir Francis Drake Boulevard (San Geronimo Valley)	98 houses on the San Geronimo Valley floor is a terrible idea. It would ruin the beauty of the valley which Valley residents have worked so hard over the years to preserve.Please help us … we would be most grateful if you could find other sites for these needed homes. Grateful for your attention to this.	Email								X		X						

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P - 4900 Sir Francis Drake Boulevard (San Geronimo Valley)	Already leaving here is problematic early in the morning and many folks work and go to school over the hill and have to go then. You would be adding probably 200 or so cars to the problem for starters. As it is I no longer go to Point Reyes on the weekends because its an extremely busy place full of tourists and the locals cant park and get to services. Dennis, I have written to you before regarding the San Geronimo Valley Golf Course and you can see now that what was once a beautiful sward of land full of animals and birds and yes golfers is now a sea of weeds and fallen trees. And yes, people walk there on the paths and I guess through the tick invested grasses as well. And now you want to put up 98 (!) houses and destroy another piece of the Valley? And what about fire and earthquake considerations. If that corridor gets blocked in an emergency we would all try to get out through Lucas Valley or perhaps Highway One but regardless its scary to think of those situations. And I was here when we fought to keep that high school and all the other developments a NO GO. Successfully might I add and I believe the plan states that land was to stay agricultural. And how are you going to get all those folks home insurance? I already know people who have been denied coverage here and several of those companies I believe want to leave California altogether. Surely you can find another spot to meet whatever criteria is mandated some place else. I dont know if you even bother to read these letters but I do want to go on record objecting wholeheartedly to this.	Email				X						X		X				
P - 4900 Sir Francis Drake Boulevard (San Geronimo Valley)	Dear Mr. Rodini please do your best to represent the better interest of all Valley residents and don't let 98 new houses be Built-in the area East of Woodacre along San Francisco Drake. The San Geronimo Valley has one road in-and-out and Our septic systems and fire protection issues are at stake! Please say no!	Email				X								X	X			
P - 4900 Sir Francis Drake Boulevard (San Geronimo Valley)	Hello Dennis, I am writing as a long term resident in Woodacre with some concern regarding the 50 acre parcel alongside SFD Blvd and the Flanders ranch property. Please include all San Geronimo residents in any planning that might go forward on this horrendous possibility for 98 homes. We are already struggling with water issues, fire issues, septic issues, road access in emergencies, current Fairfax traffic jams. We already have a valley floor jammed with County infrastructure - water dept, fire dept, PGE substation, noise and lights all times of day and night. I certainly hope this possibility will become part of many public forums on your agenda for this small and fragile valley. Since the last fire on White's Hill, nothing has been done to remove the battery box from the long-broken highway sign which may have sparked that fire. I think, in speaking to my neighbors, the SGV feels a bit neglected by your office and I sincerely hope that can be rectified.	Email				X				X				X	X			
P - 4900 Sir Francis Drake Boulevard (San Geronimo Valley)	I am a homeowner in Woodacre since 1972. I am of the opinion that there are some places that shouldn't be developed. I include all of western Marin in that category, but for the moment I will comment on the proposed development of 98 homes just west of White Hill on Sir Francis Drake Blvd. Entering the valley, one's first impression is the beautiful rural landscape that is becoming rare in California. That experience would be negatively impacted by any development in that area. 98 Homes would mean around 200 automobiles adding to the congestion in Fairfax and San Anselmo and create a great deal more air pollution than already exists. That area is not only a seasonal wetland, but is in the headwaters of the Lagunitas Creek Watershed. Construction and habitation of that area would cause irreparable harm to wildlife, including endangered salmonids and many other species. I support development along the 101 corridor.	Email				X				X		X		X	X			
P - 4900 Sir Francis Drake Boulevard (San Geronimo Valley)	I am a resident and homeowner in Forest Knolls, where I live with my husband and 5 year old. I'm responding to signs I saw posted today along SFD near Dickson Ranch, in regard to the building of 98 homes on that property. I have searched online and cannot find any more information about this proposal. I would like to add my comment that you please proceed very cautiously-- while I really recognize the need for more housing and more affordable housing in Marin, I have a couple of big concerns-- environmental impact (including air quality, native species habitat preservation and restoration, and light pollution. I also have some concern about SFD as the only way into and out of the valley, in case of emergency (and, just in terms of general traffic congestion, and air pollution). So my comment is to please very carefully consider these matters before proceeding. Thank you!	Email				X						X		X		X		
P - 4900 Sir Francis Drake Boulevard (San Geronimo Valley)	I am dead set against the proposal to develop 98 new houses on the 50 acre High School property. Such a large development is exactly the kind of change the valley has fought against for decades. Such a large development would change the Valley's pastoral character enormously and negatively. I believe the Valley's population stands around 3,500. If 4 people were to live in each house of such a new village, the valley's population would increase over 10% overnight. I would support fewer than half such units of low-income housing if they were located in dispersed fashion, and wouldn't have such a negative aesthetic consequences.	Email								X		X					X	
P - 4900 Sir Francis Drake Boulevard (San Geronimo Valley)	I believe West Marin has reached its carrying capacity for new homes, especially in regards to water, roads, septic and fire safety. Are we going for maximum buildout? What happens after we add 3500 homes the State of California tells we have to do? What happens in 2031 when they say we have to do it again? I watched the zoom meeting with Leelee Thomas on February 16, and she said it's either the carrot or the stick. I did not see any carrots in the equation, only threats. The proposed 98 houses in the heart of the San Geronimo Valley is an ill conceived proposal. It does not take into consideration that the plot of land is the headwaters of the Lagunitas Creek which is a coho salmon nursery. It's a flood plain when we get substantial rain - if you have ever driven by in a downpour, the entire area is a web of small streams before it gets to the main stream channel about 500 feet from there. I believe the infrastructure needed for those houses would not only be an eyesore, but also a detriment to our fragile ecosystem.	Email		X		X				X	X	X		**X**	**X**			
P - 4900 Sir Francis Drake Boulevard (San Geronimo Valley)	I could not access the Balancing Site work area so I am submitting these comments here. SGV is am amazing place to be due to low development. I have had the benefit of living here 25 years. What is being proposed in both of the areas of the School property and at the Gold Course are for higher end homes. Higher end homes are not a help for our community. We need homes for families with kids, We need Senior housing. We don't need another 127 above moderate income homes. Have some vision. Create a place with a grocery store, deli, and place for people to meet. Create Senior housing. Have ability to share vehicles. This area could become a hub for our community to use and support. It is also a sensitive environmental area. It used to be where water would spread out when it rained and slowly sink into the ground providing water all year round for the fish. More concrete and asphalt = more runoff. This vision of 98 separate high end homes here is not fitting to the rural area of our valley. It is just going to bring in more people who want a rural lifestyle from other areas and NOT give our locals homes. Every day, people, and families are looking for homes. Renters are being pushed out. It is unaffordable to live here. Solve the problem we have now, housing for our locals. Not bring more people here. Also, the place being considered at 6900 Sir Francis Drake is a privately owned place. Owned by a family that owns quite a bit of property in the Valley as it is. I certainly hope public monies are not going to rehab this property.	Email								X		X					X	
P - 4900 Sir Francis Drake Boulevard (San Geronimo Valley)	I do not support 98 houses on the 50 acre High School property facing Drake Blvd in the San Geronimo Valley. It would destroy our Valley's rural character and the beauty we prize in that view shed. I support seeking alternative Valley sites not visible from Sir Francis Drake Blvd to meet our affordable housing obligations.	Email								X		X						
P - 4900 Sir Francis Drake Boulevard (San Geronimo Valley)	I do not support 98 houses on the 50 acre High School property facing Drake Blvd. in the San Geronimo Valley. It would destroy our Valley's rural character, the beauty we prize in that view shed and create a new, unnecessary and unwanted village. I believe many of these West Marin sites are not strategic due to environmental concerns, lack of local jobs, and inadequate infrastructure to sustain such a population increase. I support seeking alternative Marin sites to meet our affordable housing obligations.	Email		X	X					X		X						
P - 4900 Sir Francis Drake Boulevard (San Geronimo Valley)	I do not support 98 houses on the 50 acre High School property facing Drake Blvd. in the San Geronimo Valley. It would destroy our Valley's rural character, the beauty we prize in that view shed and create a new, unnecessary and unwanted village. I support seeking alternative Valley sites to meet our affordable housing obligations. We are already working to provide affordable housing for people here in the San Geronimo Valley. Please work with our group to create homes and units that are an integral part of our existing villages. Continue to preserve our open, agricultural spaces and the green belt that surrounds this rural part of Marin county.	Email								X		X					X	
P - 4900 Sir Francis Drake Boulevard (San Geronimo Valley)	I do not support 98 houses on the 50 acre High School property facing Drake Blvd. in the San Geronimo Valley. It would destroy our Valley's rural character, the beauty we prize in that view shed and create a new, unnecessary and unwanted village. I support seeking alternative sites to meet our affordable housing obligations. Supervisor Rodoni- You have been a supporter of the environment and the agg culture of Marin. I know we need housing in Marin, but this is the wrong spot for 98 houses especially without any transit options for residents in that development.	Email						X		X		X						

Location	Comment	Source	PCL	INF	SER	TRF	PRK	PTR	ACT	NMR	SEA	NAT	CUL	FIR	WAT	HLT	EQT	GDL
P - 4900 Sir Francis Drake Boulevard (San Geronimo Valley)	I do not support 98 houses on the 50 acre High School property facing Drake Blvd. in the San Geronimo Valley. It would destroy our Valley's rural character, the beauty we prize in that view shed and create a new, unnecessary and unwanted village. I support seeking alternative Valley sites to meet our affordable housing obligations.	Email								X		X						
P - 4900 Sir Francis Drake Boulevard (San Geronimo Valley)	I do not support 98 houses on the 50 acre High School property facing Drake Blvd. in the San Geronimo Valley. It would destroy our Valley's rural character, the beauty we prize in that view shed and create a new, unnecessary and unwanted village. I support seeking alternative Valley sites to meet our affordable housing obligations.	Email								X		X						
P - 4900 Sir Francis Drake Boulevard (San Geronimo Valley)	I do not support 98 houses on the 50 acre High School property facing Drake Blvd. in the San Geronimo Valley. It would destroy our Valley's rural character, the beauty we prize in that view shed and create a new, unnecessary and unwanted village. I support seeking alternative Valley sites to meet our affordable housing obligations.	Email								X		X						
P - 4900 Sir Francis Drake Boulevard (San Geronimo Valley)	I do not support 98 houses on the 50 acre High School property facing Drake Blvd. in the San Geronimo Valley. It would destroy our Valley's rural character, the beauty we prize in that view shed and create a new, unnecessary and unwanted village. I support seeking alternative Valley sites to meet our affordable housing obligations.	Email								X		X						
P - 4900 Sir Francis Drake Boulevard (San Geronimo Valley)	I do NOT support 98 houses on the 50 acre High School property facing Drake Blvd. in the San Geronimo Valley. It would destroy our Valley's rural character, the beauty we prize in that view shed and create a new, unnecessary and unwanted village. I support seeking alternative Valley sites to meet our affordable housing obligations.	Email								X		X						
P - 4900 Sir Francis Drake Boulevard (San Geronimo Valley)	I do not support 98 houses on the 50 acre High School property facing Drake Blvd. in the San Geronimo Valley. It would destroy our Valley's rural character, the beauty we prize in that view shed and create a new, unnecessary and unwanted village. I support seeking alternative Valley sites to meet our affordable housing obligations.	Email								X		X						
P - 4900 Sir Francis Drake Boulevard (San Geronimo Valley)	I do not support 98 houses on the 50 acre High School property facing Drake Blvd. in the San Geronimo Valley. It would destroy our Valley's rural character, the beauty we prize in that view shed and create a new, unnecessary and unwanted village. I support seeking alternative Valley sites to meet our affordable housing obligations.	Email								X		X						
P - 4900 Sir Francis Drake Boulevard (San Geronimo Valley)	I do not support 98 houses on the 50 acre High School property facing Drake Blvd. in the San Geronimo Valley. It would destroy our Valley's rural character, the beauty we prize in that view shed and create a new, unnecessary and unwanted village. I support seeking alternative Valley sites to meet our affordable housing obligations.	Email								X		X						
P - 4900 Sir Francis Drake Boulevard (San Geronimo Valley)	I do not support 98 houses on the 50 acre High School property facing Drake Blvd. in the San Geronimo Valley. It would destroy our Valley's rural character, the beauty we prize in that view shed and create a new, unnecessary and unwanted village. I support seeking alternative Valley sites to meet our affordable housing obligations.	Email								X		X						
P - 4900 Sir Francis Drake Boulevard (San Geronimo Valley)	I do not support 98 houses on the 50 acre High School property facing Drake Blvd. in the San Geronimo Valley. It would destroy our Valley's rural character, the beauty we prize in that view shed and create a new, unnecessary and unwanted village. I support seeking alternative Valley sites to meet our affordable housing obligations.	Email								X		X						
P - 4900 Sir Francis Drake Boulevard (San Geronimo Valley)	I do not support 98 houses on the 50 acre High School property facing Drake Blvd. in the San Geronimo Valley. It would destroy our Valley's rural character, the beauty we prize in that view shed and create a new, unnecessary and unwanted village. I support seeking alternative Valley sites to meet our affordable housing obligations.	Email								X		X						
P - 4900 Sir Francis Drake Boulevard (San Geronimo Valley)	I do NOT support 98 houses on the 50 acre High School property facing Drake Blvd. in the San Geronimo Valley. It would destroy our Valley's rural character, the beauty we prize in that view shed and create a new, unnecessary and unwanted village. Not to mention the massive increase in traffic and fire hazard/danger such a development would create. I support seeking alternative Valley sites to meet our affordable housing obligations.	Email				X				X		X						
P - 4900 Sir Francis Drake Boulevard (San Geronimo Valley)	I do not support new housing on the 50-acre High School property facing Drake Blvd. in the San Geronimo Valley. This important rural gateway property to the valley and nearby Pt Reyes National Seashore should remain in agricultural use as part of the historical Flanders Ranch. I support seeking alternative Valley sites to meet our affordable housing obligations. Our community will vigorously oppose such inappropriate development.	Email								X		X						
P - 4900 Sir Francis Drake Boulevard (San Geronimo Valley)	I hate to hear that 98 houses are going to be built on the 50 acre High School property facing Drake Blvd. in the San Geronimo Valley. I do support seeking alternative Valley sites to meet our affordable housing obligations, and hope that some compromise can be reached that won't destroy the beautiful approach to West Marin or further stress our limited resources. I know we are lucky to have remained untouched by "progress" for so long but oh boy I hope our luck holds a bit longer. Anything you can do to stop this unwelcome and depressing development will be much appreciated.	Email								X		X			X			
P - 4900 Sir Francis Drake Boulevard (San Geronimo Valley)	I have lived in Woodacre for over 40 years. I love the contry feel and woodsy environment. I highly object to the proposed low income housing development on Flanders property. I am your constituent, and voted for you when you were running for office. Please stop any expansion, re- zoning or building projects that will bring more residences to the Valley. I travel down San Geronimo Valley drive every day as, I work in San Rafael. When I get to the corner of Sir Francis Drake, I would be looking at the very piece of land across SFD, that the houses will be built on. As I understand the proposal, 100 houses will be built on 50 acres. The new development will also add to traffic on SFD by quite a bit. Please, let's keep the beautiful rural nature of the Valley as it is now.	Email				X				X		X						
P - 4900 Sir Francis Drake Boulevard (San Geronimo Valley)	I hope you're well and please allow me to begin by thanking you for your leadership on a range of issues important to San Geronimo Valley residents. While I know the recent report about possible locations for additional housing in the county is quite preliminary (and conducted by a third party that does not speak for Marin County residents), it makes sense that concerned citizens speak loudly and early on this topic. Please know that I do not support 98 houses on the 50 acre high school property facing Sir Francis Drake Blvd. in the San Geronimo Valley. It would destroy our Valley's rural character. It would destroy the beauty we prize in coming over White's Hill. It would create a new, unnecessary and unwanted village. Most important, it would add a possible 200 additional vehicles and possibly up to one thousand daily vehicle trips in and out of the valley to an already congested road. Anyone trying to get to Highway 101 at 8:00 am already knows that the traffic is horrible as you enter Fairfax. This would add to that exponentially. Anyone living on or near SFD Blvd. knows that the weekends are equally tough with many tourists heading to and from the coast. While I support affordable housing I believe there are better ways and better locations to accomplish this.	Email				X				X		X						

Location	Comment	Source	PCL	INF	SER	TRF	PRK	PTR	ACT	NMR	SEA	NAT	CUL	FIR	WAT	HLT	EQT	GDL
P - 4900 Sir Francis Drake Boulevard (San Geronimo Valley)	I just want to add my voice to ask you not to support the new San Geronimo housing being considered. The environmental and infrastructure impact will be horrible !	Email		X								X						
P - 4900 Sir Francis Drake Boulevard (San Geronimo Valley)	I oppose 98 houses on the 50 acre High School property facing Drake Blvd. in the San Geronimo Valley. .West Marin is maxed out on development because of fire concerns, small roads, septic. The proposed development at the west side of whites hill is the headwaters of the Lagunitas creek which is our coho salmon nursery. It's a floodplain and is unsuitable for development. The infrastructure needed for a development would harm our fragile ecosystem. If Marin County decides to do what the State is demanding, then why not put the entire buildout on the St. Vincents property which is right next to the freeway and could handle the increase in population. We would like to see all the building be for homeless and low income people - like all the people who commute from Vallejo and Richmond to serve us daily because they can not afford to live in our county. Many other properties in Marin would be more suitable.	Email				X				X		X		X	X		X	
P - 4900 Sir Francis Drake Boulevard (San Geronimo Valley)	I oppose a housing development the 50 acre High School property facing Drake Blvd. in the San Geronimo Valley. .1. West Marin is maxed out on development because of fire concerns, small roads, septic. 2. The proposed development at the west side of whites hill is the headwaters of the Lagunitas creek which is our coho salmon nursery. It's a floodplain and is unsuitable for development. 3. The infrastructure needed for a development would harm our fragile ecosystem. 4.Building would ruin agricultural, rural beauty which is so precious to the San Geronimo Valley. 5. If Marin County decides to do what the State is demanding, then why not put the entire buildout on the St. Vincents property which is right next to the freeway and could handle the increase in population. We would like to see all the building be for homeless and low income people - like all the people who commute from Vallejo and Richmond to serve us daily because they can not afford to live in our county. Or work with the state to move San Quentin out to a more appropriate place for a prison such as barren land in the dessert, and make a beautiful development on the waterfront right next to shops and the ferry and the Richmond Bridge which would be easy access to transportation and would not overburden Sir Francis Drake which is already far too congested. Many other properties in Marin would be more suitable.	Email				X				X	X	X		**X**	**X**			
P - 4900 Sir Francis Drake Boulevard (San Geronimo Valley)	I support adding housing in appropriate locations. I do not believe the west side of White's Hill, on Tamalpais School property is appropriate. The area is prone to flooding and is vital for supporting the flow of water in the creeks that are used by salmon. Also, the county plan has been to add housing on the 101 corridor, leaving west Marin rural. As a member of the Valley Emergency Response Team, I am concerned about adding so many more cars on the road, ensuring a bottleneck in the event of an emergency evacuation.	Email									X	X		X				
P - 4900 Sir Francis Drake Boulevard (San Geronimo Valley)	I support adding housing in appropriate locations. I do not believe the west side of White's Hill, on Tamalpais School property is appropriate. The area is prone to flooding and is vital for supporting the flow of water in the creeks that are used by salmon. Also, the county plan has been to add housing on the 101 corridor, leaving west Marin rural. As a member of the San Geronimo community, I am concerned about adding so many more cars on the road, ensuring a bottleneck in the event of an emergency evacuation.	Email									X	X		X				
P - 4900 Sir Francis Drake Boulevard (San Geronimo Valley)	I think that the proposed low cost housing sites and sizes and the solution is not thought out ! For instance , the 98 homes in Woodacre would create a huge traffic problem and also be inappropriate . The Olema location and proposal would ruin the nature of Olema ! And Dennis Rodoni lives in Olema ! The west Marin area has been protected for a reason ! The nature and small town is the reason that we are all here ! I've lived here for 46 years and believe that it would be more appropriate to absorb the housing on properties that are all ready developed and make it attractive for homeowners to build ADUs Please revise the thinking around this important topic of affordable housing !	Email				X				X		X						
P - 4900 Sir Francis Drake Boulevard (San Geronimo Valley)	I'm not sure if this is accurate, but we have heard a site for 98 new homes is being proposed at the base of Whites Hill. We can only hope this is not true as that would be disastrous for the area and environment, and truly spoil the natural surroundings	Email										X						
P - 4900 Sir Francis Drake Boulevard (San Geronimo Valley)	It has come to my attention, either from neighborly chats or from other sources, there is a potential plan taking shape to add housing to the San Geronimo Valley. Specifically close to 100 houses on the land we refer to as "Flander's Field", where there was once a plan for a high school. That plan didn't materialize, as this valley began to be more declarative and assertive in stating the vision for this area, and guidelines for what is / is not acceptable development. When I moved to the valley 25 years ago, I thought it might be a place to stay for a couple of years. But after understanding this community better, and listening to our elders, I came to understand and appreciate what our environmental advocates have been fighting for and diligently guarding. This is the reason I still live here today. In my home town, I watched as the cherry trees toppled, the apple orchards fell, and the planting fields gave way to urbanization and development. It still breaks my heart whenever I drive through and see the Police Station, Post Office, County Buildings and parking lots where I once played with my friends and frolicked with my dog. I am filled with such gratitude to live here in the San Geronimo Valley, comforted in knowing this place is truly special. Magical. I now take up the fight to preserve our natural beauty and the ecosystems that depend on limits to growth. My neighbor refers to entering the valley as the "Chitty Chitty Bang Bang effect", where the wheels of the car roll up under you and you start to float along in the last part of your journey home. Please help us keep this natural beauty as opposed to a Shitty Shitty first impression entering this sacred place. Also, this would impact and devastate what little is left of our natural habitat for spawning salmon...I've witnessed and taken part in many debates and county board meetings to force the stoppage of building homes due to this deleterious impact. 98 homes will be a huge battle, but taking a cue from our long term residents, environmental groups, and our elders, I can't stand back and watch this happen. I look forward to understanding both of your positions on this subject. Signed, a long time Marin tax payer, diligent voter, and newly commissioned soldier in the fight to preserve my surroundings	Email										X						
P - 4900 Sir Francis Drake Boulevard (San Geronimo Valley)	Please don't approve this development! It is way too big and is in a terrible location. It will destroy the beautiful view that every Valley resident welcomes on their return home to the SG Valley. Yes we need some affordable housing, but not on this parcel, and not at market rate. The Sir Francis Drake corridor in San Geronimo should remain rural. This huge development would create a new, unnecessary and unwanted village.	Email								X		X					X	
P - 4900 Sir Francis Drake Boulevard (San Geronimo Valley)	Please don't support the development of 98 units on former Flanders Ranch land in the San Geronimo Valley. This site stands at the gateway to the SGV and the headwaters of the watershed which houses our endangered salmonids. It is an especially sensitive location, both aesthetically and ecologically, and should be protected from all development. Just a couple of years ago, you and the BOS attempted to do a very good thing for Marin County and the SGV by purchasing the golf course, in order to protect it permanently from development and to give endangered salmonid populations a place to recover. Probably, in a few years' time, some public entity—possibly Marin County—will resume the pursuit of these goals when TPL sells the land. If the County allows a new village of several hundred people to be built, with all the ecological disturbance that entails, just a short distance upstream from the salmonid sanctuary, it will jeopardize this important environmental restoration project. I believe the 98 units are envisioned to be targeted to buyers of "above moderate" income. If so, then this suggests that the homes will be too expensive to count as the sort of affordable housing that the voting public sympathizes with. We don't want a SGV that is even more exclusive (economically speaking) than it already is—especially not at the expense of the ecology, aesthetics, etc. Please do all you can to keep the old Flanders Ranch area completely open and agricultural. Thank you very much.	Email										X					X	
P - 4900 Sir Francis Drake Boulevard (San Geronimo Valley)	Please understand that our history and values are not supportive of mass development in the San Geronimo Valley. We value our rural character for aesthetic reasons but equally for safety. We must protect egress for fire primarily. In addition we do not have the infrastructure and resources to support 98 new homes. This ideal would be better served along the 101 corridor. Thank you for consideration of supporting no development of the open fields adjacent to Flander's property.	Email		X						X		X		X				

Location	Comment	Source	PCL	INF	SER	TRF	PRK	PTR	ACT	NMR	SEA	NAT	CUL	FIR	WAT	HLT	EQT	GDL
P - 4900 Sir Francis Drake Boulevard (San Geronimo Valley)	Remove the high school site from any consideration for housing. It is not supported in our Community Plan (see excerpts below). In addition, this is the critical view shed that every Valley resident experiences and "welcomes" on their return "home" to the San Geronimo Valley as they negotiate the curve, going west, at the bottom of White's Hill leaving the eastern urbanized corridor (where over 90% of Marin residents live), behind. This priceless Valley view encompasses the entire Ottolini/Flanders ranch and the Spirit Rock Meditation Center property from the meadows on the flats, to the uplands and ridge that seems to disappear going west towards the Nicasio pass. High School Site Issues: The development currently proposed would create the equivalent of a "new" village and its location next to SF Drake Blvd. would destroy the Valley's rural character. Increased traffic would overwhelm Drake Blvd. in route to and from the eastern urbanized corridor and 101. The north east section of San Geronimo Creek, which is home to coho salmon and steelhead trout, appears to be in this area. If confirmed, protection of this area could impact proposed development. FYI - Historically, this 50 acre school site was originally owned by the Ottolini/Flanders Ranch family. It was condemned for use of a planned High School -- part of the '61 Master Plan calling for 20,000 residents and 5000 homes. This '61 Master Plan was scuttled in 1972/73 after the newly elected Board of Supervisors voted to adopt the new County Wide Plan. Subsequently, the BOS began the development of highly successful Community Plans for designated areas in West Marin. At one point, (the '80's I think) the Tamalpais school board considered selling it's 3 unused school sites. Two were in the eastern corridor and one was in the Valley. The board appointed a committee to study the situation and make a recommendation. It was composed of Kate Blickhahn (Drake High School Superintendent), Dale Elliott of Forest Knolls and me. They implemented our recommendation to sell the two sites in the eastern corridor and preserve the Valley site for agriculture. The Flanders family subsequently worked out a lease (still in effect) with the District so their cattle could use it for grazing as was done when they owned it. Two proposals to create an orchard never materialized	Email				X				X		X							
P - 4900 Sir Francis Drake Boulevard (San Geronimo Valley)	The proposed 98 new houses on the 50 acre parcel in the San Geronimo Valley was just brought to my attention. I am not opposed to more housing, but I am opposed to how and where they will be built i(n a cluster creating a new community as well as changing the landscape as you enter The Valley). There have been other projects in the past that are woven into the existing communities. The low cost neighborhood next to the Trailer park is a fine example. I am assuming that this Federal money is to be used for our lower income population? I have lived in the Valley for 50 years at which time we voted against sewer lines and natural gas in order to keep housing developments from taking place. Will a project this large take that into consideration? I will be sure to be adding my input as this project moves forward. Dennis, as old acquaintance I'm hoping that we can find time to discuss this more, I am no longer 'asleep at the wheel'….Thank you for taking my opinion into consideration.	Email		X						X		X			X		X	
P - 4900 Sir Francis Drake Boulevard (San Geronimo Valley)	This is a terrible idea! I can tell you that it will become another problem like Victory Village. You can't just plunk down a totally different community (with different needs and mind-sets) inside another unique community. And what about water !??!?!?!?! I do not support 98 houses on the 50 acre High School property facing Drake Blvd. in the San Geronimo Valley. It would destroy our Valley's rural character, the beauty we prize in that view shed and create a new, unnecessary and unwanted village. I support seeking alternative Valley sites to meet our affordable housing obligations	Email								X		X						
P - 4900 Sir Francis Drake Boulevard (San Geronimo Valley)	This proposal make no sense for multiple valid reasons. Please do what you can to reject it.	Email								X								
P - 4900 Sir Francis Drake Boulevard (San Geronimo Valley)	While I support adding housing in WMarin, I believe the White Hill location is not appropriate for the reasons below: This clearly goes against our Community Plan. It is an area prone to flooding As a result of the above, it interferes with the watershed that provides the creeks that support the endangers steelhead. It will place untold stress on an already precarious road evacuation during wildfire season. the Valley is already under major stress with failing septics, with no help on the horizon as has been blocked by the Planning Group. The Valley and it's homeowners are about to be handcuffed by the new stream side ordinances, making repairs and maintenance near impossible, so the added burden of 68 homes is such a double standard. The rural character of the Valley will be visually destroyed. .I am curious why this information has been held from the public and the very short window of public comment which further punctuates your desertion, the same way you mid-handled the Golf Course debacle. Please respond with a confirmation of my very strong objection to this location.	Email								X	X	X						
R1 - 5800 Sir Francis Drake Boulevard (San Geronimo Valley)	(Comment edited for length) Please find attached the San Geronimo Valley Planning Group's response to the proposed Housing Element update. Background: The San Geronimo Valley Planning Group was formed in 1972 to help elect Gary Giacomini to the Board of Supervisors in order to gain the critical third vote necessary to kill the 1961 Countywide Master Plan, which had envisioned 5,000 new homes and 20,000 additional residents for the San Geronimo Valley alone. While the plan was updated in 1982 and 1997, its central premise has never changed: preserving our Valley's rural character and protecting our natural environment. This commitment - along with that of many other community members - also helped permanently preserve more than 2,300 acres of open space in our beloved Valley. We have been trying to apprehend the efforts of Marin County to meet the state- mandated "housing elements" through the rezoning of existing parcels. We are very concerned that few Valley residents are aware of the potential impact of this housing mandate on our community and that the Planning Group was not included in the process from the beginning. Apparently, pressure from the State has made it a top- down County effort. The Planning Group adamantly opposes the proposed, potential locations within our community identified below. High school property - We are alarmed by Candidate Housing Site P, the proposal to build 98 above-moderate-income units through rezoning the high school property next to the Ottolini/Flanders' Ranch at the bottom of White's Hill on Sir Francis Drake Blvd. Our Community Plan clearly spells out that the use of this property should remain as agriculture or open space; the high school district agreed. Our reasons are numerous. 1. It would be a visual blight, destroying not only the aesthetics of the entrance to our Valley but also jamming suburbia into the inland rural corridor. 2. It would be a dangerous location, creating a separate enclave with an entrance off a very busy highway, and removing one of the few places where traffic can safely pass slower traffic. 3. Because this property is not within the boundaries of any of our four villages, it would destroy the essence of our Valley's character, creating, in essence, a new, completely separate village of above market-rate houses. Moreover, there is no sewage or water infrastructure at this location. 4. It is an environmentally poor choice, being a wetland area, a swamp in the winter, and within the headwaters of the Lagunitas Creek watershed. Former golf course club house property. Candidate Housing Site R-1. This open space, referred to as the Commons, must remain open space and not also become a "new village" location. In addition to being the likely site for a new firehouse, this is an essential area for community gatherings, and provides needed parking for and access to Roy's Redwoods, Maurice Thorner Open Preserve, and the two, newly conservation easement-protected meadow parcels (former front and back nine). The Planning Group does favor affordable housing in the Valley. We want our residents and their children to be able to afford to remain in our community and to maintain our diverse population. But the current plan seems to be solely a County "numbers game," meeting only the requirements of the State for 3,569 units in unincorporated Marin. The parcels in the Valley are identified for families earning more than $132,000 annually. For an individual, this would be the equivalent of $62.50 an hour. The Valley is a rural community. The minimum wage in California is $14 an hour. Anyone who works a full- time job should be able to afford decent housing. This plan does not provide that. The County must focus on the real need for affordable housing, with more emphasis and incentive on legalizing existing units and making it easier to create second units, ADUs and JDUs. A stronger effort is needed by the County to find appropriate parcels within our existing villages. Potentially, this might include the current location of the County fire department, which, if/when it's vacated, could be an excellent location for affordable multi-family housing. There are others. A time constraint shouldn't be the deciding factor in zoning parcels for housing. There has to be more thought put into this and community involvement shouldn't be limited to a flawed survey. We request the County hold an in-person meeting for the community as soon as possible, preferably in the multi-purpose room at Lagunitas School. Additionally, the Planning Group would like to work with you to find a way to provide more affordable housing units within our community while continuing to maintain and protect the rural character and natural resources that make our Valley such an attractive place to live and raise a family.	Email (See Email Comments Received.PDF, pp. 234-236)				X	X	X		X		X						X	
R1 - 5800 Sir Francis Drake Boulevard (San Geronimo Valley)	1: can we use the Lagunitas school parcel that is before the Spirit Rock parcel? 2: If Spirit Rock is built on can it be hidden from road? 3: The visual view when you enter the Valley is gorgeous and should be maintained. 4: Lagunitas school campus has lots of unused space.	Email										X						

Location	Comment	Source	PCL	INF	SER	TRF	PRK	PTR	ACT	NMR	SEA	NAT	CUL	FIR	WAT	HLT	EQT	GDL
R1 - 5800 Sir Francis Drake Boulevard (San Geronimo Valley)	I could not access the Balancing Site work area so I am submitting these comments here. SGV is am amazing place to be due to low development. I have had the benefit of living here 25 years. What is being proposed in both of the areas of the School property and at the Gold Course are for higher end homes. Higher end homes are not a help for our community. We need homes for families with kids, We need Senior housing. We don't need another 127 above moderate income homes. Have some vision. Create a place with a grocery store, deli, and place for people to meet. Create Senior housing. Have ability to share vehicles. This area could become a hub for our community to use and support. It is also a sensitive environmental area. It used to be where water would spread out when it rained and slowly sink into the ground providing water all year round for the fish. More concrete and asphalt = more runoff. This vision of 98 separate high end homes here is not fitting to the rural area of our valley. It is just going to bring in more people who want a rural lifestyle from other areas and NOT give our locals homes. Every day, people, and families are looking for homes. Renters are being pushed out. It is unaffordable to live here. Solve the problem we have now, housing for our locals. Not bring more people here. Also, the place being considered at 6900 Sir Francis Drake is a privately owned place. Owned by a family that owns quite a bit of property in the Valley as it is. I certainly hope public monies are not going to rehab this property.	Email								X		X					X	
R1 - 5800 Sir Francis Drake Boulevard (San Geronimo Valley)	I just want to add my voice to ask you not to support the new San Geronimo housing being considered. The environmental and infrastructure impact will be horrible !	Email		X								X						
R10 - 200 San Pedro Road (Santa Venetia)	Hello and thank you for the opportunity to comment regarding Future Housing Sites in Marin County. I attended the local Housing meeting regarding Santa Venetia and Los Ranchitos on February 15th and live in the Santa Venetia area. Here are my comments from a Santa Venetia resident perspective: 1. The process, while advised by the Marin County Planning Department, is being run by a consulting agency that is not familiar with Marin County and the local areas & neighborhoods. 2. The number of assigned housing units to Santa Venetia, 422, ignores the following. Before housing site numbers are assigned and accepted, a "CEQA-lite" analysis should be performed to determine if the numbers and locations are practical from a CEQA perspective. We heard these concerns brushed off with the response that if any development is going to be done, a full CEQA would be completed before development could/would proceed. This would be an "after-the-fact" process, with the fact that the housing numbers and sites have already been assigned and accepted, and would be too late to be influential in the development process. a. There is only one practical vehicle road out of Santa Venetia to the freeway that is already heavily impacted by three schools, the one at the JCC, the Marin School, and Venetia Valley school, and a large pre-school. Traffic in & out of Santa Venetia is also already heavily impacted by the JCC, the Civic Center traffic, the Marin Lagoon traffic, the Veterans Memorial traffic, the Marin Lagoon Housing and the commercial enterprises along McInnis Parkway. b. Some of the sites selected are in wetlands areas, such as the McPhail school site next to North San Pedro Road. c. some of the sites selected are next to the Bay and subject to special development restrictions, such as the McPhail school site. d. The total number of housing units assigned to Marin County, and not just to the unincorporated areas, does not take into account the water needs. And we, Marin County as serviced by MMWD, are in the middle of a water shortage with future years looking to be worse due to Climate Change. 3. Using city limit boundaries to direct neighborhood focus and comment ignores the reality of the holistic nature of a neighborhood that crosses city limits and unincorporated boundaries. It is expedient, especially for an outside consulting firm not familiar with Marin County or Santa Venetia, but not realistic. This is especially true for the Santa Venetia area. Santa Venetia is heavily impacted by what the City of San Rafael does or does not due around the Civic Center, at the intersection of North San Pedro Road and Civic Center Drive, around Marin Lagoon Park, at the Marin Lagoon homes neighborhood, and at the Marin Ranch Airport. Using city limit boundaries is expedient but not accurate and realistic in appraising housing impacts to a neighborhood such as Santa Venetia. And restricting the geographical area that Santa Venetia residents can comment on and have input to, to not include what is inside the City limits of San Rafael for the areas noted above is violating our rights to comment on and have input to what is impacting our neighborhood. Thank you for the chance to comment	Email				X				X				X	X			
R10 - 200 San Pedro Road (Santa Venetia)	Here in Santa Venetia, we are living with water shortages, traffic congestion, and our community's evacuation route was named the most dangerous in Marin and yet huge additional numbers of housing are proposed for this flood prone neighborhood. That's insane! We are not fooled by claims that these new residents won't drive everywhere. They will. We already know that every person of driving age in our neighborhood not only drives but owns a car, or truck. They line our streets, further restricting access routes. There are sites where housing can happen like at Northgate Mall, but not in our overcrowded flood zone.	Email				X				X	X			X				
R10 - 200 San Pedro Road (Santa Venetia)	I am a longtime resident of Santa Venetia in unincorporated Marin County, and a member of the Santa Venetia Neighborhood Association (SVNA). I, along with many of my neighbors, attended the February 15 Zoom meeting on the Housing Element initiative, which seems detached from the reality of worsening climate change. Much of Santa Venetia exists in a flood plain; other parts are in the WUI. With only a single one-lane route in and out of the neighborhood — North San Pedro Road — our existing infrastructure is already stretched to the breaking point with daily traffic congestion restricting both egress and ingress. We currently have fewer than 1800 residences in Santa Venetia, yet the Housing Element recommends 422 additional units, representing an increase of approximately 25%. Adding a fraction of 422 units to Santa Venetia would greatly compromise the safety of its residents, in addition to degrading quality of life. Many of our homes were built in the WUI. We are at constant risk of wildfire, with unstable hillsides that in recent years have collapsed onto North San Pedro Road. Like all of our Marin neighbors, we are constrained by drought. Here in Santa Venetia, our water supply comes from tanks that are sited in the WUI. Supplanting CEQA review in the drive to create multi-million-dollar homes puts our cultural as well as our natural environment at risk. For example, Oxford Valley, a known site of native tribal artifacts such as shell mounds, has been designated for 45 "above moderate income" units. Bypassing CEQA would eliminate the protection of cultural resources here and in other areas of Santa Venetia and Marin that have not yet been surveyed and would be lost forever. Our neighborhood is known to be at severe risk of flooding. The SVNA is currently participating in a collaboration between the California Dept of Parks and Rec, The County of Marin, and The SF Bay NERR to "Identify and Evaluate Sea Level Rise Adaptation Options to Solve Road Flooding in China Camp State Park." The project recently received a $525k grant to address the critical issue of flooding in the low- lying segment of North San Pedro that runs between Santa Venetia and Peacock Gap. This road is our only alternate route to Highway 101, one that our emergency responders rely upon when highway traffic is heavy. Here is a link to the July 26, 2021 article in the Marin IJ that describes the flooding (which is only expected to worsen) and touches on our risk of impeded egress/ingress in the event of a natural disaster: https://www.marinij.com/2021/07/26/china-camp-road-flooding-project-gets-525k-grant/ The Housing Element did not seem include plans for significant numbers of true low- income housing. In the future, we would like to see a plan that factors in housing that our neighbors throughout Marin County could afford.	Email			X		X				X	X	X	X	X	X			
R10 - 200 San Pedro Road (Santa Venetia)	I am against the proposed units on North San Pedro Road. This proposed project is completely unsustainable and not researched for undesirable living situations. There are many factors that indicate this would not be a good site to build. Factors such as flood control, sea rising at a rate we can expect in the coming years, congestion, removal of a ball park and mostly there are no services to support this project. Well thought out projects include parks, services, bike paths, sidewalks and a reasonable egress in case of fire. North San Pedro Road is all ready congested due to a large school and many churches on this road. Another road to San Rafael is available to Point San Pedro Road however this road is failing due to floods in the winter and very evident sink holes that are not being addressed. More traffic would of course erode the roads further and in the past have had slides on this road particularly after recent tree removal has increased the likely occurance.	Email			X	X	X				X	X	X		X				

Location	Comment	Source	PCL	INF	SER	TRF	PRK	PTR	ACT	NMR	SEA	NAT	CUL	FIR	WAT	HLT	EQT	GDL
R10 - 200 San Pedro Road (Santa Venetia)	I attended the zoom meeting a few nights ago. I share the concern of some of my neighbors, well articulated by Gina Hagen. While I totally support affordable housing (so question if this will be "affordable" for working class people), I think we already have too many high density buildings on San Pedro Road, Jcc, school, rest homes, elder affordable housing, civic center etc... So I would support maybe 25 more units or something manageable, but hundreds seems like asking for trouble in an emergency. I live on Labrea way and I am glad we have housing for families, down the street, but a common problem is the amount of cars and high occupancy of some of the apartments. The overflow of cars goes all the way to Rosal, and currently I have had cars parked in front of my house for a month and more. It is not a significant problem in my case, but my neighbor who has teenagers with cars, is having to struggle to park their own cars, while the overflow is from housing two blocks away. Obviously San Rafael is a good place for more housing and i would think a place closer to the freeway like Marin Square could be used for extra units of housing. I also would personally like to build an accessory unit in my front yard for a student, teacher, medical professional, at affordable rate. It would be nice to have a department in Marin county who could help seniors like myself design,, get permits, and loans to afford to create such units. I myself was a renter in Marin for 36 years and lived in in-law apartments. I found it much more private and a win/win solution for the owner, typically older retired person, and myself as young professional. I was excited about an organization called Lily Pads and attended a meeting but found out later the owner was no longer providing services. So this would be a great thing to promote. Thank you for including us in your work. Hope we can have more affordable housing, while preserving the safety of our neighborhoods.	Email					X			X							X	
R10 - 200 San Pedro Road (Santa Venetia)	I served on the Santa Venetia Community Plan (SVCP) Committee for almost 10 years, including working with County Staff the last 4 years, until its final adoption in 2017. This process included a thorough survey of our neighbors who commented on every empty parcel and open space for future development (and in fact Godbe told us the response was overwhelming with a higher than normal percentage of participation). Our SVCP Committee Members represented every corner of Santa Venetia. We held community meetings (that were well-attended) so all residents had a chance to voice their opinions and ideas. No one knows Santa Venetia better than Santa Venetians. The plan was supposed to cover everything of interest to ensure a diverse, family-oriented, and happy community for years to come. Adding 442 units is simply untenable for a small, working-class hamlet such as Santa Venetia. The last two open spaces (two ball fields) are slated for high density housing. This is totally uncharacteristic of the surrounding neighbors who live in small, single- family housing. In the February 15th Housing Element Zoom call, with County Staff and Contractors from… who knows where?, we were informed that our Community Plan would need to be updated. Who would do this work? When and how soon would these updates happen? How can the County randomly update our Community Plans that we spent so many resources on. SB-9 and SB-10 are a complete contradiction to our Community Plan that we dedicated years of work and volunteer hours to finally see its adoption. These past summers, we've stayed inside due to smoke and/or triple-digit weather. We used a bucket from our shower to water our indoor and deck plants while our yard withered and died due to restrictions and requirements in place from Marin Water. We worked out evacuation routes to alert residents to escape danger due to our one road in and out of Santa Venetia. I heard chain saws, chippers, and weed whackers almost every day, regardless of the high, fire-danger days. This is due to San Rafael Fire Department notifications and requirements. Also, there is currently a plan in place for creekside residents to have their wooden levees raised two feet to protect the sinking, below-sea-level homes in the flood zone (Zone 7), due to Sea Level Rise. The CDA is currently working on a "Safety Overlay Map" to be completed after the Housing Element site are chosen. Isn't this a case of "putting the cart before the horse"? Due to the location of Santa Venetia, nestled before the ripe, fire-prone area of San Pedro Ridge and the rising Las Gallinas Creek, doesn't this deserve a second look and/or consideration of the over-inflated number of units allotted to our small hamlet. When talking to my neighbors, the 422 units sounds so incredulous, they find it impossible to believe. As a volunteer, seasoned Land Use Member, I can't say I blame them. It's mind-boggling. Please reconsider Santa Venetia's allotted housing site numbers.	Email									X			X	X			
R10 - 200 San Pedro Road (Santa Venetia)	I will reiterate the comments I made at the February 15 Housing Element meeting… I've lived in SV for over 30 years. I've served on the Santa Venetia Neighborhood Association Board of Directors for almost 30 years. Through our neighborhood association, The Santa Venetia Neighborhood Association (SVNA), we try to get the word out so that our residents are aware of upcoming projects and opportunity to comment. We've heard from Santa Venetia residents that they want to protect our quality of life. We are already concerned about the constant fire danger, flooding, Sea Level Rise, ingress and egress, and unsafe evacuation routes. Climate change is a huge concern for us and as well, we have run out of water in Marin County and are under strict mandates, so I can't understand how adding more and more housing units will help. And to restate, 422 units in SV is an increase of almost 25% of the 1,700-1,800 units we currently had, at last count. It's a very shocking number of additional units for us. I grew up in San Rafael. I hate what they've done to the City and have been constantly disappointed with the building choices and what they have given up. I don't want to see that happening in Santa Venetia – more congestion and loss of our green spaces. Affordable housing sounds great on paper, but we never seem to get that promise fulfilled. I've followed projects in San Rafael and for almost every project, the promise is a huge amount of housing with a small portion designated affordable and then after the project passes through the hurdles, the affordable-housing number is adjusted… always downward. I remember previously rules were passed to keep up with the demand of affordable housing, but the goalposts seem to constantly change and that number is lowered. What is the promise that won't happen with this process? Also, I heard them say at that meeting, they were giving schools and churches more flexibility by allowing them to build on parking lots? If that is the case, where will people park? They've already lowered the parking needed for new building in our communities. We already have overblown congestion, car-to-car parking along the road, and lots of red curbs. The idea of reducing parking requirements for new units AND building on parking required for old units is frightening. And finally, I realize this mandate for housing comes from the state. I believe we (my neighbors) are all on the same page when I ask that you push-back against these mandates. These are not only unrealistic for Santa Venetia but for all of Marin, the wonderful county I grew up in.	Email								X	X	X		X	X		X	

Location	Comment	Source	PCL	INF	SER	TRF	PRK	PTR	ACT	NMR	SEA	NAT	CUL	FIR	WAT	HLT	EQT	GDL
R10 - 200 San Pedro Road (Santa Venetia)	Re: Marin County Housing and Safety Elements Update, 2023 – 2031. The Santa Venetia Neighborhood Association (SVNA) is an organization representing the interests of 1,700 – 1,800 households (4,474 residents per the 2019 census figures) who live in Santa Venetia. As an organization, we are dedicated to the enhancement and preservation of the character and quality of life of the Santa Venetia neighborhood. We do our best to represent our community and have an established reputation to be a voice for proper development. And in accordance with our mission statement, we, the Board Members of the SVNA, feel compelled to comment on this issue. We want to ensure that the Marin County Board of Supervisors receives an accurate impression from our community regarding the updated Housing Element and are writing today to summarize feedback we have heard from many of our members. Many residents of Santa Venetia, including members of the SVNA, attended the February 15 Zoom meeting where consultants representing the interests of the housing element initiative presented online tools for community feedback. We find these tools inadequate; rather than serving as an open platform for the BOS to receive realistic community input, they seem designed to provide information to housing element staff as to where to add more housing. The Housing Element recommends 422 additional units for Santa Venetia. There are currently fewer than 1,800 residences in Santa Venetia, so this represents an increase of approximately 25%— far more growth than the neighborhood has seen for at least two decades. This mandate seems utterly siloed from the worsening reality of global warming and climate change, (the existence of which was recognized both in the Countywide Plan and by the Marin County Civil Grand Jury) which is leading to catastrophic weather events such as fires and flooding. The upland parts of Santa Venetia not directly threatened by flooding are part of the Wildland Urban Interface (WUI) and are subject to year-round fire danger. Like all of Marin, we are constrained by drought, and our water supply comes from tanks that are sited in the WUI. We are actively working actively to protect our homes; parts of Santa Venetia are now Firesafe Marin neighborhoods. Road access to Santa Venetia is highly constricted; we have daily traffic congestion that affects both egress and ingress. The remaining undeveloped parts of Santa Venetia include unstable hillsides that recently led to multiple landslides onto our roadway. All of the issues mentioned above are familiar to the Marin County BOS. They are also the same reasons that Santa Venetia has not experienced anything close to 25% growth in decades. There is no way to grow by 25% using market-rate housing on undeveloped parcels without compromising our safety. The Housing Element directly suggests that our personal safety, including safety from climate events, fire, and safe water supply, is secondary to their objectives of housing growth. One type of growth we believe is needed in Marin County is true low-income housing. By this we mean the type of housing that our current typical Santa Venetia resident could afford. We also support the right of residents to add accessory dwelling units (ADU) to their homes. However, it was clear that the Housing Element does not include plans for significant numbers of low-income housing. Instead, it promotes “market rate” housing, which we know means homes that will sell for millions of dollars each. We are effectively being asked to endanger ourselves to serve the interests of developers to sell multi-million- dollar homes to elite buyers from outside of the region. To paraphrase one of our SVNA members, “The County’s first responsibility is for the health and safety of the existing residents of our neighborhood.” We ask you to consider this as you move forward. If the intent of the Housing Element is to bypass CEQA process, as alluded to in the Zoom meeting on Feb. 15th, the existence of culturally sensitive resources, including shell mounds in Oxford Valley, still cannot be ignored. Damaging cultural resources of native peoples in order to comply with Housing Element goals would be inconsistent with Marin County values and our historical respect for our earliest Santa Venetia natives. Oxford Valley, the site of known shell mounds, has been designated for 45 “above moderate income” units. Other areas of Santa Venetia may not yet have been properly surveyed for these resources, and bypassing CEQA would also eliminate their protection. These are just a few of the concerns that we have. The SVNA has encouraged our members to send comment letters as well, citing their concerns about this update. Please include those concerns as concerns of the SVNA	Email				X				X	X			X	X		X	
R13 - 26600 State Route 1 (Tomales)	I would like to suggest an alternative site to the one listed on the east side of Hwy 1 and 1st Street in Tomales. After living in Tomales very close to 30 years, I feel the intersection there is already quite impacted due to school traffic approaching both elementary and high school, the district office traffic, our downtown businesses Including bakery, deli, and general store and much weekend tourist traffic mistaking their way to Dillon Beach. I feel one or more of the sites at old high school, or further north of “hub” of town would be more suitable and would not add to the current congestion.	Email				X												
R15 -12785 Sir Francis Drake Boulevard (Inverness)	The proposed development and locations designated for housing in unincorporated West Marin is ill-conceived and inappropriate. This appears to be a numbers game on the part of the County and outside, contracted MIG development agency. The plan lacks consideration for or understanding of natural resources, environmental hazards and the existing community. Communities around Tomales Bay are watershed areas with drainage into the vulnerable bay, creeks and streams, the salt marshes and wildlife habitats. The site near Vladimir’s restaurant, across from Dixon Marine, is directly across from Tomales Bay and almost at sea level. This area and the road can flood during a high tide or heavy rain, draining pollution into the bay. Also the proposed building would affect the small downtown of Inverness. West Marin is served by narrow, curving, two lane access roads. For Inverness there is only one road, in or out, a problem during flooding, fires, landslides and general overcrowding on weekends and holidays. These roads frequently need repair when lanes crumble into a creek, hillside or the bay. No freeways please, as was proposed in the 60s. I have lived in Inverness since the 70s. As a single working mother, a teacher, I raised my daughter in Inverness. Over the years I have seen families and friends move away as rentals, cottages and small units were converted to more lucrative Airbnbs and second homes. There are 4 houses around me with 2 units in each. Two are completely unoccupied. Two are rarely used by their absentee owners, leaving each second unit vacant. There are many houses like this in Inverness and far too many BnBs and other short term rentals. An absentee owner might purchase a house, spend an exorbitant amount of money improving it for short term rental or investment. Possible housing is currently available. West Marin already has serious problems related to climate change, as well as overcrowding, road congestion air and noise pollution from cars, sewage and, most obviously, water. Inverness is served by water storage tanks and is already predicted by IPUD to be more of a problem this year than last. Reservoirs dry up and water pipes only move water from one drought ridden area to another. Any development is a threat to our limited water supply. The arbitrary number of proposed building in these unincorporated areas of West Marin ignores the environment, nature and roads. The plan is insensitive to the existing communities and the influence of inappropriate, even hazardous, building.	Email				X					X	X		X	X			

Location	Comment	Source	PCL	INF	SER	TRF	PRK	PTR	ACT	NMR	SEA	NAT	CUL	FIR	WAT	HLT	EQT	GDL
R18 - 375 Shoreline Highway (Tamalpais)	(Comment edited for length) Sustainable TamAlmonte has the following comments and recommendations regarding the merits of the above referenced Tam Valley, Almonte, and Manzanita Candidate Housing Sites listed in the 2023-2031 Housing Element DRAFT Candidate Housing Sites List. Due to the unique characteristics of the area, encouraging residential development, especially high-density development, at the above referenced Sites would increase the risk of undue harm to the environment and undue hardship, illness, injury and/or death to the current and future residents. The Tam Valley, Almonte, and Manzanita commercial lowlands, in which the above referenced sites are located, experience the most number of environmental constraints and hazards of any area in Unincorporated Marin. Both the Marin Countywide Plan's EIR and the 2012 Housing Element's SEIR demonstrate that development at these sites would exacerbate the existing dangerous conditions and add new significant adverse environmental impacts (which) magnifies the probability that a tragedy would ensue and the multiple mitigations that a developer would need to fulfill would cause development costs to soar. These factors make the sites unsuitable for affordable housing. The only acceptable course of action is to eliminate the sites from the inventory. Below is a list of the unique natural features, hazards, and limited resources in the Tam Valley, Almonte, and Manzanita lowlands that constrain development and population growth and substantiate our argument. For a quick overview of these constraints, please view the attached table. I. Dangerous Traffic with Unacceptable Level Of Service – LOS "F" Of Local Roadways:. II. Flooding, 100 Year Floodplain, Impending Sea Level Rise III. Filled Marsh Areas With High Seismic Activity, Liquefaction, Subsidence and Mud Displacement. IV. Air Quality & Noise: Increased Risk of Residents Developing Serious Illness Due to Living Near Major Roadways. V. Hazardous Materials: For additional information regarding potential health impacts to workers and future residents who may be exposed to hazardous soil conditions, related to past uses, in Tam Junction and Manzanita, please follow the below link to read the comment letter by Technical Expert Matt Hagemann. VI. Endangered Special Status Species. VII. Insufficient Services & Public Transit. VIII. Historic Wetlands and Baylands Corridor. IX. Historic Marshland That Could Be Restored. 160 Shoreline Hwy and 260 Redwood Hwy Frontage Rd. are historic marshland. X. High Density Development Is Not Consistent With the Traditional Character Of The Local Semi-Rural Communities. Conclusion: The County now has sufficient information to understand that the proposed Tam Valley, Almonte, and Manzanita Sites are inappropriate for inclusion in the 2023-2031 Housing Element Candidate Housing Sites Inventory. Not only would construction of housing on these sites exacerbate the already existing problems but doing so when the County admits in the Marin Countywide Plan EIR and 2012 Housing Element's FSEIR that significant adverse unavoidable impacts would result from such construction defies logic. Moreover, there can be no benefit that would override the impacts of environmental harm and severe illness, injury or loss of life from building on the Tam Valley, Almonte, and Manzanita Candidate Housing Sites, which are laden with environmental constraints and dangerous hazards. The best course of action would be for the County to revise the list to reflect the current problems with traffic, seismic activity, hazardous soil conditions, air and noise pollution, water supply, flooding, and impending sea level rise and to find that no new residential development in the Tam Junction & Manzanita areas is appropriate. Such action would be consistent with the Board of Supervisors' sensible decisions.	Email (See Email Comments Received.PDF, pp. 123-151)	X	X	X	X		X		X	X	X	X	X	X	X		
R18 - 375 Shoreline Highway (Tamalpais)	(Comment edited for length) Sustainable TamAlmonte has the following comments and recommendations regarding the merits of the above referenced Tam Valley, Almonte, and Manzanita Candidate Housing Sites listed in the 2023-2031 Housing Element DRAFT Candidate Housing Sites List. Due to the unique characteristics of the area, encouraging residential development, especially high-density development, at the above referenced Sites would increase the risk of undue harm to the environment and undue hardship, illness, injury and/or death to the current and future residents. The Tam Valley, Almonte, and Manzanita commercial lowlands, in which the above referenced sites are located, experience the most number of environmental constraints and hazards of any area in Unincorporated Marin. Both the Marin Countywide Plan's EIR and the 2012 Housing Element's SEIR demonstrate that development at these sites would exacerbate the existing dangerous conditions and add new significant adverse environmental impacts (which) magnifies the probability that a tragedy would ensue and the multiple mitigations that a developer would need to fulfill would cause development costs to soar. These factors make the sites unsuitable for affordable housing. The only acceptable course of action is to eliminate the sites from the inventory. Below is a list of the unique natural features, hazards, and limited resources in the Tam Valley, Almonte, and Manzanita lowlands that constrain development and population growth and substantiate our argument. For a quick overview of these constraints, please view the attached table. I. Dangerous Traffic with Unacceptable Level Of Service – LOS "F" Of Local Roadways:. II. Flooding, 100 Year Floodplain, Impending Sea Level Rise III. Filled Marsh Areas With High Seismic Activity, Liquefaction, Subsidence and Mud Displacement. IV. Air Quality & Noise: Increased Risk of Residents Developing Serious Illness Due to Living Near Major Roadways. V. Hazardous Materials: For additional information regarding potential health impacts to workers and future residents who may be exposed to hazardous soil conditions, related to past uses, in Tam Junction and Manzanita, please follow the below link to read the comment letter by Technical Expert Matt Hagemann. VI. Endangered Special Status Species. VII. Insufficient Services & Public Transit. VIII. Historic Wetlands and Baylands Corridor. IX. Historic Marshland That Could Be Restored. 160 Shoreline Hwy and 260 Redwood Hwy Frontage Rd. are historic marshland. X. High Density Development Is Not Consistent With the Traditional Character Of The Local Semi-Rural Communities. Conclusion: The County now has sufficient information to understand that the proposed Tam Valley, Almonte, and Manzanita Sites are inappropriate for inclusion in the 2023-2031 Housing Element Candidate Housing Sites Inventory. Not only would construction of housing on these sites exacerbate the already existing problems but doing so when the County admits in the Marin Countywide Plan EIR and 2012 Housing Element's FSEIR that significant adverse unavoidable impacts would result from such construction defies logic. Moreover, there can be no benefit that would override the impacts of environmental harm and severe illness, injury or loss of life from building on the Tam Valley, Almonte, and Manzanita Candidate Housing Sites, which are laden with environmental constraints and dangerous hazards. The best course of action would be for the County to revise the list to reflect the current problems with traffic, seismic activity, hazardous soil conditions, air and noise pollution, water supply, flooding, and impending sea level rise and to find that no new residential development in the Tam Junction & Manzanita areas is appropriate. Such action would be consistent with the Board of Supervisors' sensible decisions.	Email (See Email Comments Received.PDF, pp. 123-151)	X	X	X	X		X		X	X	X	X	X	X	X		

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R18 - 375 Shoreline Highway (Tamalpais)	(Comment edited for length) The Tam Design Review Board is charged with focusing on and supporting the provisions of the Tamalpais Area Community Plan (TACP). In addition to laying out a description of the appropriate character of the community, this plan clearly sets forth constraints specifying that environmental hazards must be taken into account in the site selection process. Indeed, this is also crucial for the viability of the adoption of the Housing Element itself. According to step #7 of the Housing Element's Site Identification Process: "Provide in the analysis a general description of any known environmental or other features (e.g., presence of floodplains, protected wetlands, oak tree preserves, very high fire hazard severity zones) that have the potential to impact the development viability of the identified sites..." p. 10. The TACP "places a strong emphasis on protecting the public safety and preserving the natural resources of the community, while still permitting individual property owners to realize reasonable development potentials" (pg. I-3). This balance is more critical today than it was in 1992 when the plan was written, with the risk of chronic flooding, impending sea level rise, and fire in the wildland-urban interface presenting an ever- greater peril to our neighborhoods. Tam Valley, Almonte, Homestead Valley, and Muir Woods Park are already viable and diverse neighborhoods, containing a range of housing from high-end single family residences to affordable apartments. Maintaining this diversity has long been a goal of the community, as expressed in Section I-C of the TACP. Added mixed use development in the Tam Junction area could, with proper planning and infrastructure update, provide needed housing which would have a minimal negative impact and enhance the community. The Housing Element should take a closer look at the potential for rezoning to achieve its goals. For those of lesser wealth to have access to the amenities available in the Tam Area, in particular good schools and proximity to jobs and open space, is a noble and important goal. There are a series of recent State laws that are aimed at helping to solve the housing crisis in California. Unfortunately, in its search for a solution to this crisis the legislature has crafted programs that offer density, height, and FAR incentives to housing developers in return for a very small number of "affordable" units without any appropriations for much needed transportation and infrastructure. There are likely to be many unintended consequences of these housing mandates which will be left to cities and counties to deal with. The most critical of these possible outcomes as they relate to the Tam area is the risk of fire and flooding and the already constricted evacuation routes in the face of such emergencies. Shoreline Highway in Tam Valley is where most of the proposed housing sites for our area lie. It is not hard to imagine the combination of a wildfire threat and high tide event occurring simultaneously, which would bring the evacuation of our entire area to a complete standstill and result in property damage and human fatalities. We further note that steadily increasing traffic impacts on Shoreline Highway from tourism continue to aggravate all these challenging conditions. While we applaud the careful consideration of available sites by MIG, as community volunteers appointed to research and uphold the values of the Tam Plan, we cannot in good conscience support the choice of the sites within our area without: 1) A detailed study of future traffic and its impacts on evacuation through Tam Junction and the Highway 101 on-ramp; 2) A careful analysis of the impact of new, medium or high-density housing on the Bothin Marsh and the risks of chronic flooding; 3) Development of a plan for Highway 1 at Manzanita and along Shoreline Highway to accommodate imminent sea level rise; and 4) Assurances that, if there is no way to avoid selecting housing sites in the Tam Plan area for development, the resulting housing will be protected from speculative investors and the potential to remove these future developments from the long-term rental market. The Tamalpais Area is so vulnerable to climate change disasters that, frankly, unless the housing built has a direct impact on resolving the housing crisis and addressing those most in need, new development will only intensify the crises of both climate risks and affordability. We understand the mandates from the State require you to make some challenging choices in selecting housing sites. In addition to placing questions of safety and environmental stewardship at the top of your agenda, we would like to suggest that you include in the current update of the Countywide Plan some further policies that will help guide County planning in the face of both State mandates and, if and when these mandates are modified, the undesirable results that might emerge. Please see the attached detailed list of policies	Email (See Email Comments Received.PDF, pp. 228-231)				X					X	X		X			X	
R18 - 375 Shoreline Highway (Tamalpais)	ATTACHMENT from Tam Design Review Board: Suggested Additional Policies to be Included in the Housing Element: 1. Wildfire Risk: Use mathematical modeling to investigate and predict wildfire risk. Prohibit the building of housing (even ADUs) in fire critical areas. 2. Flood Risk: Prohibit new housing in areas at risk of flooding from storm surge or sea level rise. 3. Bothin Marsh: Require all new development adjacent to Bothin Marsh to supplement and follow the policies that are designed to preserve the marsh. Given the County's recent efforts to restore and preserve the marsh, it makes no sense to select a site adjacent to the marsh for any form of dense development. 4. Evacuations: Require that new housing development along Shoreline Highway trigger a study and redesign of the traffic patterns to ensure that any new housing development in that area will not worsen traffic or increase the threat to life safety during an evacuation. Any assessment of traffic impacts of emergency evacuation should include new housing developments in the City of Mill Valley, as Shoreline Highway is the only exit should East Blithedale become blocked. 5. Short Term Rentals: Eliminate short-term rentals completely, or allow only on-site, owner-occupied properties to have short-term rentals. If someone does not live on-site, then the property is arguably an investment property only, and any claim of the need for that short-term rental income can be disregarded. This would enable ADUs to be counted toward the Housing Element numbers (see item #10). 6. Vacancies: Create a County mandated vacancy tax (as San Francisco is presently considering) to create disincentives for leaving housing units empty. Exemptions could be made for work from home or dwellings under a certain square footage if the homeowner works from home or needs the space for their own dwelling use. This has been documented to establish new housing units and therefore could be counted toward the housing numbers. 7. Speculative Investment: Eliminate corporate ownership of housing of up to 4 units. This will stop speculative over-bidding of properties (which drives up housing costs) and land banking (which is performed to drive up the value for the investors.) This is crucial for market rate units that do not have controls over ownership. If dwelling units are constructed and snatched up by corporate investors, the goal of increasing availability will not be achieved. If the housing crisis is still occurring after another eight years, the next round of RHNA numbers will be even higher, and even more density will be demanded. 8. Promote Affordability: Require that all lot splits and ADUs rent at affordable rates. This would enable ADUs to be counted toward the Housing Element numbers that are required for affordable units, which are the most difficult to achieve (see item #10). The Planning Department should not look at undersized parcels as a hardship that allows for an exemption to exceed the FAR. Instead, it should be taken as a limitation on the lot that will provide a smaller home, which will ultimately result in a diverse range of housing options and levels of affordability. 9. Conversions: Provide incentives to preserve the existing stock of affordable housing and/or promote the conversion of existing market rate housing to affordable housing. Tam Valley in particular has a large number of rental units which have traditionally been at the affordable end of the rental spectrum, and could readily be maintained as such with the necessary incentives. 10. Alternative Measures: Follow the Housing Element guidelines to promote and locate alternative housing sites as per recommended policies #5, 8, and 9 above. These guidelines state that acceptable dwelling unit numbers can be counted through "the availability of ADUs and JADUs for occupancy, rather than used as offices or guest houses." (p. 30) In addition: "Alternative adequate sites: Under limited circumstances, a local government may credit up to 25 percent of their adequate sites requirement per income category through existing units that will be: substantially rehabilitated in a multifamily rental or ownership housing complex of three or more units that are converted from non-affordable to affordable rental; preserved at levels affordable to low – or very low – income households, where the local government has provided those units with committed assistance." (p. 30)	Email				X					X	X		X			X	
R18 - 375 Shoreline Highway (Tamalpais)	I am writing to endorse the attached letter from Sustainable TamAlmonte to the Marin County Board of Supervisors and Planning Commission regarding the merits of the proposed Tam Valley, Almonte, and Manzanita Candidate Housing Sites listed in the 2023-2031 Marin County Housing Element DRAFT Candidate Housing Sites List. The need for housing our homeless is desperate but building residential space at Tam Junction is just NOT logical. The idea of building along Shoreling/ Highway 1 is very questionable. It is already a populated area with minimal sidewalks and access to needed resources. Thank you for your consideration of the attached letter	Email	X	X	X	X		X		X	X	X	X	X	X	X		

Location	Comment	Source	PCL	INF	SER	TRF	PRK	PTR	ACT	NMR	SEA	NAT	CUL	FIR	WAT	HLT	EQT	GDL
R18 - 375 Shoreline Highway (Tamalpais)	We are writing in regard to the sites chosen for possible inclusion into county plans for housing in the Almonte/Tam Valley area of the county. Of the eight sites mentioned in your Balancing Act scenario, five are in a serious flood zone and one is located, not on, but in Richardson's Bay. Your commentary regarding the avoidance of environmental hazards has been completely ignored by whatever staff was used to choose these sites. The properties in the flood zone are 160 Shoreline, assessor's parcel # 052-041-27, 217 Shoreline, 223 Shoreline, and 204 Flamingo Rd. he site which is actually in the bay is 260 Redwood Hwy. Oddly enough, there is one property across the road from 160 Shoreline which is on solid ground. That would be the Muir Woods Lodge, a motel which actually has some open space which could be used for more housing. Why was this property ignored when lesser properties were chosen? Considering that we are familiar with the sites in the Almonte/Tam Valley area but not the rest of the county, it seems very strange that your staff has chosen properties which flood now and will continue to flood even more in the future. We wonder about your motivation in focusing on dangerous and inappropriate land. We also wonder why your staff has chosen properties which are pretty much lumped together in the same area which will further exacerbate the level F traffic problems which occur for us every day. If these sites were chosen to be close to public transportation, we would remind you that there is no viable public transportation in our area. So we would be looking forward to much more daily auto traffic. We are extremely disappointed in the Balancing Act which appears to be a distraction and of no practical value. We wonder how much time and money was wasted on promoting this ridiculous game. We also wonder how many sites in the rest of the county are totally inappropriate but are being promoted as a way to choose our fate which, as you know, is not the case. Surely, the Board of Supervisors can do better than promoting this silly distraction rather than facing what is a serious problem for the future well being of Marin County.	Email				X		X			X							
R18 - 375 Shoreline Highway (Tamalpais)	We oppose new housing in the areas mentioned in Tam Junction due to flooding and traffic and possible fires, can't get out of here now. Tell Scott Wiener and his friends to move on.	Email				X					X			X				
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R19 - Tennessee Valley Road (Tamalpais)	(Comment edited for length) Sustainable TamAlmonte has the following comments and recommendations regarding the merits of the above referenced Tam Valley, Almonte, and Manzanita Candidate Housing Sites listed in the 2023-2031 Housing Element DRAFT Candidate Housing Sites List. Due to the unique characteristics of the area, encouraging residential development, especially high-density development, at the above referenced Sites would increase the risk of undue harm to the environment and undue hardship, illness, injury and/or death to the current and future residents. The Tam Valley, Almonte, and Manzanita commercial lowlands, in which the above referenced sites are located, experience the most number of environmental constraints and hazards of any area in Unincorporated Marin. Both the Marin Countywide Plan's EIR and the 2012 Housing Element's SEIR demonstrate that development at these sites would exacerbate the existing dangerous conditions and add new significant adverse environmental impacts (which) magnifies the probability that a tragedy would ensue and the multiple mitigations that a developer would need to fulfill would cause development costs to soar. These factors make the sites unsuitable for affordable housing. The only acceptable course of action is to eliminate the sites from the inventory. Below is a list of the unique natural features, hazards, and limited resources in the Tam Valley, Almonte, and Manzanita lowlands that constrain development and population growth and substantiate our argument. For a quick overview of these constraints, please view the attached table. I. Dangerous Traffic with Unacceptable Level Of Service – LOS "F" Of Local Roadways:. II. Flooding, 100 Year Floodplain, Impending Sea Level Rise III. Filled Marsh Areas With High Seismic Activity, Liquefaction, Subsidence and Mud Displacement. IV. Air Quality & Noise: Increased Risk of Residents Developing Serious Illness Due to Living Near Major Roadways. V. Hazardous Materials: For additional information regarding potential health impacts to workers and future residents who may be exposed to hazardous soil conditions, related to past uses, in Tam Junction and Manzanita, please follow the below link to read the comment letter by Technical Expert Matt Hagemann. VI. Endangered Special Status Species. VII. Insufficient Services & Public Transit. VIII. Historic Wetlands and Baylands Corridor. IX. Historic Marshland That Could Be Restored. 160 Shoreline Hwy and 260 Redwood Hwy Frontage Rd. are historic marshland. X. High Density Development Is Not Consistent With the Traditional Character Of The Local Semi-Rural Communities. Conclusion: The County now has sufficient information to understand that the proposed Tam Valley, Almonte, and Manzanita Sites are inappropriate for inclusion in the 2023-2031 Housing Element Candidate Housing Sites Inventory. Not only would construction of housing on these sites exacerbate the already existing problems but doing so when the County admits in the Marin Countywide Plan EIR and 2012 Housing Element's FSEIR that significant adverse unavoidable impacts would result from such construction defies logic. Moreover, there can be no benefit that would override the impacts of environmental harm and severe illness, injury or loss of life from building on the Tam Valley, Almonte, and Manzanita Candidate Housing Sites, which are laden with environmental constraints and dangerous hazards. The best course of action would be for the County to revise the list to reflect the current problems with traffic, seismic activity, hazardous soil conditions, air and noise pollution, water supply, flooding, and impending sea level rise and to find that no new residential development in the Tam Junction & Manzanita areas is appropriate. Such action would be consistent with the Board of Supervisors' sensible decisions.	Email (See Email Comments Received.PDF, pp. 123-151)	X	X	X	X		X		X	X	X	X	X	X	X		

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R19 - Tennessee Valley Road (Tamalpais)	(Comment edited for length) The Tam Design Review Board is charged with focusing on and supporting the provisions of the Tamalpais Area Community Plan (TACP). In addition to laying out a description of the appropriate character of the community, this plan clearly sets forth constraints specifying that environmental hazards must be taken into account in the site selection process. Indeed, this is also crucial for the viability of the adoption of the Housing Element itself. According to step #7 of the Housing Element's Site Identification Process: "Provide in the analysis a general description of any known environmental or other features (e.g., presence of floodplains, protected wetlands, oak tree preserves, very high fire hazard severity zones) that have the potential to impact the development viability of the identified sites..." p. 10. The TACP "places a strong emphasis on protecting the public safety and preserving the natural resources of the community, while still permitting individual property owners to realize reasonable development potentials" (pg. I-3). This balance is more critical today than it was in 1992 when the plan was written, with the risk of chronic flooding, impending sea level rise, and fire in the wildland-urban interface presenting an ever- greater peril to our neighborhoods. Tam Valley, Almonte, Homestead Valley, and Muir Woods Park are already viable and diverse neighborhoods, containing a range of housing from high-end single family residences to affordable apartments. Maintaining this diversity has long been a goal of the community, as expressed in Section I-C of the TACP. Added mixed use development in the Tam Junction area could, with proper planning and infrastructure update, provide needed housing which would have a minimal negative impact and enhance the community. The Housing Element should take a closer look at the potential for rezoning to achieve its goals. For those of lesser wealth to have access to the amenities available in the Tam Area, in particular good schools and proximity to jobs and open space, is a noble and important goal. There are a series of recent State laws that are aimed at helping to solve the housing crisis in California. Unfortunately, in its search for a solution to this crisis the legislature has crafted programs that offer density, height, and FAR incentives to housing developers in return for a very small number of "affordable" units without any appropriations for much needed transportation and infrastructure. There are likely to be many unintended consequences of these housing mandates which will be left to cities and counties to deal with. The most critical of these possible outcomes as they relate to the Tam area is the risk of fire and flooding and the already constricted evacuation routes in the face of such emergencies. Shoreline Highway in Tam Valley is where most of the proposed housing sites for our area lie. It is not hard to imagine the combination of a wildfire threat and high tide event occurring simultaneously, which would bring the evacuation of our entire area to a complete standstill and result in property damage and human fatalities. We further note that steadily increasing traffic impacts on Shoreline Highway from tourism continue to aggravate all these challenging conditions. While we applaud the careful consideration of available sites by MIG, as community volunteers appointed to research and uphold the values of the Tam Plan, we cannot in good conscience support the choice of the sites within our area without: 1) A detailed study of future traffic and its impacts on evacuation through Tam Junction and the Highway 101 on-ramp; 2) A careful analysis of the impact of new, medium or high-density housing on the Bothin Marsh and the risks of chronic flooding; 3) Development of a plan for Highway 1 at Manzanita and along Shoreline Highway to accommodate imminent sea level rise; and 4) Assurances that, if there is no way to avoid selecting housing sites in the Tam Plan area for development, the resulting housing will be protected from speculative investors and the potential to remove these future developments from the long-term rental market. The Tamalpais Area is so vulnerable to climate change disasters that, frankly, unless the housing built has a direct impact on resolving the housing crisis and addressing those most in need, new development will only intensify the crises of both climate risks and affordability. We understand the mandates from the State require you to make some challenging choices in selecting housing sites. In addition to placing questions of safety and environmental stewardship at the top of your agenda, we would like to suggest that you include in the current update of the Countywide Plan some further policies that will help guide County planning in the face of both State mandates and, if and when these mandates are modified, the undesirable results that might emerge. Please see the attached detailed list of policies	Email (See Email Comments Received.PDF, pp. 228-231)				X					X	X		X			X	

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R2 - North Knoll Road and St. Thomas Drive (Strawberry)	I am writing to request that Strawberry site R2 be removed from potential sites for high density housing. This site is not appropriate for high density housing. The Eagle Rock neighborhood already has traffic problems, and adding units will exacerbate those issues. This particular site is in an inaccessible extreme slope. Adding high density housing to this site will also destroy the family neighborhood surrounded by open space. Please consider repurposing more urban locations instead of paving over natural landscape.	Email				X						X						
R2 - North Knoll Road and St. Thomas Drive (Strawberry)	I live on Eagle Rock Rd. It is already congested. Traffic conditions on Tiburon Blvd at most times make it difficult to enter the Eagle Rock area. At the proposed location there is a 4 way intersection, providing access to a gas station, a multi tenant commercial building, access to N. Knoll with section 8 housing (which is very busy) and the residents and providers to my neighbors and me. The proposed site is on a steep hillside making it difficult to build. There is a bus stop at the base where N. Knoll empties onto Tiburon Blvd. This may be good for your concerns, but every day there are cars parked on lower Eagle Rock Rd. using free parking to access the bus service, many use it for longer term parking when traveling out of the area. Building more units on your proposed site will increase street parking. It always does. Your proposal will increase foot traffic crossing 4 lane Tiburon Blvd. We see pedestrians, daily, risking their lives crossing to go to Strawberry Shopping Center. Sure, there is a pedestrian crossing lane, but with the traffic they are not always visible to drivers. It's a scary operation trying to cross. The traffic entering onto Tiburon Blvd. from Hwy 101 is already congested. Then add the traffic coming up from Strawberry Shopping Center. Certain times of the day you already have to wait for more than one light to get through. It seems that California fire seasons are getting longer and more intense. We could have a real discussion on that, but that is the reality today. We are located down hill from large open spaces. Our evacuation points are in Strawberry and with massive traffic also evacuating from points toward Tiburon, it could be a real disaster. Development on this plot is not a good idea.	Email				X	X		X			X		X				
R2 - North Knoll Road and St. Thomas Drive (Strawberry)	Please start paying attention to the organizing activities of NIMBY -- Marin Against Density an anti-housing group because they are already fighting future development. .47 N Knoll Road where Kruger Pines Retirement home in Strawberry is located is about in the middle of this NOT COUNTY MAINTAINED Road. The part closest to where Eagle Roc and Bay Vista is in the 20s and the part closest to 70 N Knoll Road where the vacant lot is, is at the other side and Kruger Pines is in the middle. If this gets the green light for development then trucks for construction will be really destroying the road and it will take several years to get things completed too so please work on getting this road designation changed into county maintained road as part of the approval of the land development and have the whole road redone /paved when the development is completed. . I would love to see another senior/disabled housing development be built on this land along with workforce housing for teachers and first responders too. It would be wonderful to have this parcel developed to house more seniors born 1946-1964 and to have N Knoll Road become MAINTAINED as a county maintained road too because of all the potholes that are in the road now. I would like to submit this email letter to show my support for 70 N Knoll Road to be developed into affordable housing in the extremely low income, very low income, range of seniors 62+ who are falling into homelessness all the time now with greater frequency due to how low their social security is compared to what the rental rates are in Marin County. The teachers and first responders need housing too so please build housing for them also. 70 N Knoll Rd, Mill Valley, CA 94941 | Zillow: The vacant lot last sold on 2016-10-18 for $11,60000, with a recorded lot size of 6.12 acres	Email															X	X

Location	Comment	Source	PCL	INF	SER	TRF	PRK	PTR	ACT	NMR	SEA	NAT	CUL	FIR	WAT	HLT	EQT	GDL
R2 - North Knoll Road and St. Thomas Drive (Strawberry)	So evidently this vacant lot is being considered for building housing and NIMBY is already out against it ! Please start paying attention to the organizing activities of NIMBY -- Marin Against Density an anti-housing group because they are already fighting future development. .47 N Knoll Road where Kruger Pines Retirement home in Strawberry is located is about in the middle of this NOT COUNTY MAINTAINED Road. The part closest to where Eagle Roc and Bay Vista is in the 20s and the part closest to 70 N Knoll Road where the vacant lot is, is at the other side and Kruger Pines is in the middle. If this gets the green light for development then trucks for construction will be really destroying the road and it will take several years to get things completed too so please work on getting this road designation changed into county maintained road as part of the approval of the land development and have the whole road redone /paved when the development is completed. . I would love to see another senior/disabled housing development be built on this land along with workforce housing for teachers and first responders too. It would be wonderful to have this parcel developed to house more seniors born 1946-1964 and to have N Knoll Road become MAINTAINED as a county maintained road too because of all the potholes that are in the road now. I would like to submit this email letter to show my support for 70 N Knoll Road to be developed into affordable housing in the extremely low income, very low income, range of seniors 62+ who are falling into homelessness all the time now with greater frequency due to how low their social security is compared to what the rental rates are in Marin County. The teachers and first responders need housing too so please build housing for them also. 70 N Knoll Rd, Mill Valley, CA 94941 | Zillow: The vacant lot last sold on 2016-10-18 for $11,60000, with a recorded lot size of 6.12 acres	Email																X	X
R2 - North Knoll Road and St. Thomas Drive (Strawberry)	The access to the Eagle Rock Road area is already very difficult. The narrow street, especially on the lower exit side, is concerning should there be more development in the area. All it takes is one truck to completely block the exit path from this area. I am already concerned about getting out safely should a fire happen in this area which has high fire potential. With the steep hill median strip (that is constantly slipping in rain storms) there is nowhere to widen the road. These steep hillsides are not a good location for additional housing, especially multi-tenant housing. The current traffic backing up at the Tiburon Blvd/Blithedale exit is already a problem. Additional traffic at this location is not a good idea. Please remove sites R2 and R7.	Email				X				X				X				
R2 - North Knoll Road and St. Thomas Drive (Strawberry)	The access to the Eagle Rock Road area is already very difficult. The narrow street, especially on the lower exit side, is concerning should there be more development in the area. All it takes is one truck to completely block the exit path from this area. I am already concerned about getting out safely should a fire happen in this area which has high fire potential. With the steep hill median strip (that is constantly slipping in rain storms) there is nowhere to widen the road. These steep hillsides are not a good location for additional housing, especially multi-tenant housing. The current traffic backing up at the Tiburon Blvd/Blithedale exit is already a problem. Additional traffic at this location is not a good idea. Please remove sites R2 and R7.	Email				X				X				X				
R20 - 260 Redwood Highway Frontage Road (Almonte)	(Comment edited for length) Sustainable TamAlmonte has the following comments and recommendations regarding the merits of the above referenced Tam Valley, Almonte, and Manzanita Candidate Housing Sites listed in the 2023-2031 Housing Element DRAFT Candidate Housing Sites List. Due to the unique characteristics of the area, encouraging residential development, especially high-density development, at the above referenced Sites would increase the risk of undue harm to the environment and undue hardship, illness, injury and/or death to the current and future residents. The Tam Valley, Almonte, and Manzanita commercial lowlands, in which the above referenced sites are located, experience the most number of environmental constraints and hazards of any area in Unincorporated Marin. Both the Marin Countywide Plan's EIR and the 2012 Housing Element's SEIR demonstrate that development at these sites would exacerbate the existing dangerous conditions and add new significant adverse environmental impacts (which) magnifies the probability that a tragedy would ensue and the multiple mitigations that a developer would need to fulfill would cause development costs to soar. These factors make the sites unsuitable for affordable housing. The only acceptable course of action is to eliminate the sites from the inventory. Below is a list of the unique natural features, hazards, and limited resources in the Tam Valley, Almonte, and Manzanita lowlands that constrain development and population growth and substantiate our argument. For a quick overview of these constraints, please view the attached table. I. Dangerous Traffic with Unacceptable Level Of Service – LOS "F" Of Local Roadways:. II. Flooding, 100 Year Floodplain, Impending Sea Level Rise III. Filled Marsh Areas With High Seismic Activity, Liquefaction, Subsidence and Mud Displacement. IV. Air Quality & Noise: Increased Risk of Residents Developing Serious Illness Due to Living Near Major Roadways. V. Hazardous Materials: For additional information regarding potential health impacts to workers and future residents who may be exposed to hazardous soil conditions, related to past uses, in Tam Junction and Manzanita, please follow the below link to read the comment letter by Technical Expert Matt Hagemann. VI. Endangered Special Status Species. VII. Insufficient Services & Public Transit. VIII. Historic Wetlands and Baylands Corridor. IX. Historic Marshland That Could Be Restored. 160 Shoreline Hwy and 260 Redwood Hwy Frontage Rd. are historic marshland. X. High Density Development Is Not Consistent With the Traditional Character Of The Local Semi-Rural Communities. Conclusion: The County now has sufficient information to understand that the proposed Tam Valley, Almonte, and Manzanita Sites are inappropriate for inclusion in the 2023-2031 Housing Element Candidate Housing Sites Inventory. Not only would construction of housing on these sites exacerbate the already existing problems but doing so when the County admits in the Marin Countywide Plan EIR and 2012 Housing Element's FSEIR that significant adverse unavoidable impacts would result from such construction defies logic. Moreover, there can be no benefit that would override the impacts of environmental harm and severe illness, injury or loss of life from building on the Tam Valley, Almonte, and Manzanita Candidate Housing Sites, which are laden with environmental constraints and dangerous hazards. The best course of action would be for the County to revise the list to reflect the current problems with traffic, seismic activity, hazardous soil conditions, air and noise pollution, water supply, flooding, and impending sea level rise and to find that no new residential development in the Tam Junction & Manzanita areas is appropriate. Such action would be consistent with the Board of Supervisors' sensible decisions.	Email (See Email Comments Received.PDF, pp. 123-151)	X	X	X	X		X		X	X	X	X	X	X	X		

Location	Comment	Source	PCL	INF	SER	TRF	PRK	PTR	ACT	NMR	SEA	NAT	CUL	FIR	WAT	HLT	EQT	GDL
R20 - 260 Redwood Highway Frontage Road (Almonte)	(Comment edited for length) Sustainable TamAlmonte has the following comments and recommendations regarding the merits of the above referenced Tam Valley, Almonte, and Manzanita Candidate Housing Sites listed in the 2023-2031 Housing Element DRAFT Candidate Housing Sites List. Due to the unique characteristics of the area, encouraging residential development, especially high-density development, at the above referenced Sites would increase the risk of undue harm to the environment and undue hardship, illness, injury and/or death to the current and future residents. The Tam Valley, Almonte, and Manzanita commercial lowlands, in which the above referenced sites are located, experience the most number of environmental constraints and hazards of any area in Unincorporated Marin. Both the Marin Countywide Plan's EIR and the 2012 Housing Element's SEIR demonstrate that development at these sites would exacerbate the existing dangerous conditions and add new significant adverse environmental impacts (which) magnifies the probability that a tragedy would ensue and the multiple mitigations that a developer would need to fulfill would cause development costs to soar. These factors make the sites unsuitable for affordable housing. The only acceptable course of action is to eliminate the sites from the inventory. Below is a list of the unique natural features, hazards, and limited resources in the Tam Valley, Almonte, and Manzanita lowlands that constrain development and population growth and substantiate our argument. For a quick overview of these constraints, please view the attached table. I. Dangerous Traffic with Unacceptable Level Of Service – LOS "F" Of Local Roadways:. II. Flooding, 100 Year Floodplain, Impending Sea Level Rise III. Filled Marsh Areas With High Seismic Activity, Liquefaction, Subsidence and Mud Displacement. IV. Air Quality & Noise: Increased Risk of Residents Developing Serious Illness Due to Living Near Major Roadways. V. Hazardous Materials: For additional information regarding potential health impacts to workers and future residents who may be exposed to hazardous soil conditions, related to past uses, in Tam Junction and Manzanita, please follow the below link to read the comment letter by Technical Expert Matt Hagemann. VI. Endangered Special Status Species. VII. Insufficient Services & Public Transit. VIII. Historic Wetlands and Baylands Corridor. IX. Historic Marshland That Could Be Restored. 160 Shoreline Hwy and 260 Redwood Hwy Frontage Rd. are historic marshland. X. High Density Development Is Not Consistent With the Traditional Character Of The Local Semi-Rural Communities. Conclusion: The County now has sufficient information to understand that the proposed Tam Valley, Almonte, and Manzanita Sites are inappropriate for inclusion in the 2023-2031 Housing Element Candidate Housing Sites Inventory. Not only would construction of housing on these sites exacerbate the already existing problems but doing so when the County admits in the Marin Countywide Plan EIR and 2012 Housing Element's FSEIR that significant adverse unavoidable impacts would result from such construction defies logic. Moreover, there can be no benefit that would override the impacts of environmental harm and severe illness, injury or loss of life from building on the Tam Valley, Almonte, and Manzanita Candidate Housing Sites, which are laden with environmental constraints and dangerous hazards. The best course of action would be for the County to revise the list to reflect the current problems with traffic, seismic activity, hazardous soil conditions, air and noise pollution, water supply, flooding, and impending sea level rise and to find that no new residential development in the Tam Junction & Manzanita areas is appropriate. Such action would be consistent with the Board of Supervisors' sensible decisions.	Email (See Email Comments Received.PDF, pp. 123-151)	X	X	X	X		X		X	X	X	X	X	X	X		
R20 - 260 Redwood Highway Frontage Road (Almonte)	(Comment edited for length) The Tam Design Review Board is charged with focusing on and supporting the provisions of the Tamalpais Area Community Plan (TACP). In addition to laying out a description of the appropriate character of the community, this plan clearly sets forth constraints specifying that environmental hazards must be taken into account in the site selection process. Indeed, this is also crucial for the viability of the adoption of the Housing Element itself. According to step #7 of the Housing Element's Site Identification Process: "Provide in the analysis a general description of any known environmental or other features (e.g., presence of floodplains, protected wetlands, oak tree preserves, very high fire hazard severity zones) that have the potential to impact the development viability of the identified sites..." p. 10. The TACP "places a strong emphasis on protecting the public safety and preserving the natural resources of the community, while still permitting individual property owners to realize reasonable development potentials" (pg. I-3). This balance is more critical today than it was in 1992 when the plan was written, with the risk of chronic flooding, impending sea level rise, and fire in the wildland-urban interface presenting an ever- greater peril to our neighborhoods. Tam Valley, Almonte, Homestead Valley, and Muir Woods Park are already viable and diverse neighborhoods, containing a range of housing from high-end single family residences to affordable apartments. Maintaining this diversity has long been a goal of the community, as expressed in Section I-C of the TACP. Added mixed use development in the Tam Junction area could, with proper planning and infrastructure update, provide needed housing which would have a minimal negative impact and enhance the community. The Housing Element should take a closer look at the potential for rezoning to achieve its goals. For those of lesser wealth to have access to the amenities available in the Tam Area, in particular good schools and proximity to jobs and open space, is a noble and important goal. There are a series of recent State laws that are aimed at helping to solve the housing crisis in California. Unfortunately, in its search for a solution to this crisis the legislature has crafted programs that offer density, height, and FAR incentives to housing developers in return for a very small number of "affordable" units without any appropriations for much needed transportation and infrastructure. There are likely to be many unintended consequences of these housing mandates which will be left to cities and counties to deal with. The most critical of these possible outcomes as they relate to the Tam area is the risk of fire and flooding and the already constricted evacuation routes in the face of such emergencies. Shoreline Highway in Tam Valley is where most of the proposed housing sites for our area lie. It is not hard to imagine the combination of a wildfire threat and high tide event occurring simultaneously, which would bring the evacuation of our entire area to a complete standstill and result in property damage and human fatalities. We further note that steadily increasing traffic impacts on Shoreline Highway from tourism continue to aggravate all these challenging conditions. While we applaud the careful consideration of available sites by MIG, as community volunteers appointed to research and uphold the values of the Tam Plan, we cannot in good conscience support the choice of the sites within our area without: 1) A detailed study of future traffic and its impacts on evacuation through Tam Junction and the Highway 101 on-ramp; 2) A careful analysis of the impact of new, medium or high-density housing on the Bothin Marsh and the risks of chronic flooding; 3) Development of a plan for Highway 1 at Manzanita and along Shoreline Highway to accommodate imminent sea level rise; and 4) Assurances that, if there is no way to avoid selecting housing sites in the Tam Plan area for development, the resulting housing will be protected from speculative investors and the potential to remove these future developments from the long-term rental market. The Tamalpais Area is so vulnerable to climate change disasters that, frankly, unless the housing built has a direct impact on resolving the housing crisis and addressing those most in need, new development will only intensify the crises of both climate risks and affordability. We understand the mandates from the State require you to make some challenging choices in selecting housing sites. In addition to placing questions of safety and environmental stewardship at the top of your agenda, we would like to suggest that you include in the current update of the Countywide Plan some further policies that will help guide County planning in the face of both State mandates and, if and when these mandates are modified, the undesirable results that might emerge. Please see the attached detailed list of policies	Email (See Email Comments Received.PDF, pp. 228-231)				X					X	X		X			X	
R20 - 260 Redwood Highway Frontage Road (Almonte)	As a concerned Mill Valley resident, I am writing to endorse TamAlmonte's letter to you re. the merits of Tam Valley, Almonte, & Manzanita Draft Candidate Housing Sites. Please think very carefully about sites, due to concerns about flooding, traffic and at times extreme fore danger with needed evacuation routes.	Email				X					X			X				
R20 - 260 Redwood Highway Frontage Road (Almonte)	As a concerned Mill Valley resident, I am writing to endorse TamAlmonte's letter to you re. the merits of Tam Valley, Almonte, & Manzanita Draft Candidate Housing Sites. Please think very carefully about sites, due to concerns about flooding, traffic and at times extreme fore danger with needed evacuation routes.	Email				X					X			X				

Location	Comment	Source	PCL	INF	SER	TRF	PRK	PTR	ACT	NMR	SEA	NAT	CUL	FIR	WAT	HLT	EQT	GDL
R20 - 260 Redwood Highway Frontage Road (Almonte)	ATTACHMENT from Tam Design Review Board: Suggested Additional Policies to be Included in the Housing Element: 1. Wildfire Risk: Use mathematical modeling to investigate and predict wildfire risk. Prohibit the building of housing (even ADUs) in fire critical areas. 2. Flood Risk: Prohibit new housing in areas at risk of flooding from storm surge or sea level rise. 3. Bothin Marsh: Require all new development adjacent to Bothin Marsh to supplement and follow the policies that are designed to preserve the marsh. Given the County's recent efforts to restore and preserve the marsh, it makes no sense to select a site adjacent to the marsh for any form of dense development. 4. Evacuations: Require that new housing development along Shoreline Highway trigger a study and redesign of the traffic patterns to ensure that any new housing development in that area will not worsen traffic or increase the threat to life safety during an evacuation. Any assessment of traffic impacts of emergency evacuation should include new housing developments in the City of Mill Valley, as Shoreline Highway is the only exit should East Blithedale become blocked. 5. Short Term Rentals: Eliminate short-term rentals completely, or allow only on-site, owner-occupied properties to have short-term rentals. If someone does not live on-site, then the property is arguably an investment property only, and any claim of the need for that short-term rental income can be disregarded. This would enable ADUs to be counted toward the Housing Element numbers (see item #10). 6. Vacancies: Create a County mandated vacancy tax (as San Francisco is presently considering) to create disincentives for leaving housing units empty. Exemptions could be made for work from home or dwellings under a certain square footage if the homeowner works from home or needs the space for their own dwelling use. This has been documented to establish new housing units and therefore could be counted toward the housing numbers. 7. Speculative Investment: Eliminate corporate ownership of housing of up to 4 units. This will stop speculative over-bidding of properties (which drives up housing costs) and land banking (which is performed to drive up the value for the investors.) This is crucial for market rate units that do not have controls over ownership. If dwelling units are constructed and snatched up by corporate investors, the goal of increasing availability will not be achieved. If the housing crisis is still occurring after another eight years, the next round of RHNA numbers will be even higher, and even more density will be demanded. 8. Promote Affordability: Require that all lot splits and ADUs rent at affordable rates. This would enable ADUs to be counted toward the Housing Element numbers that are required for affordable units, which are the most difficult to achieve (see item #10). The Planning Department should not look at undersized parcels as a hardship that allows for an exemption to exceed the FAR. Instead, it should be taken as a limitation on the lot that will provide a smaller home, which will ultimately result in a diverse range of housing options and levels of affordability. 9. Conversions: Provide incentives to preserve the existing stock of affordable housing and/or promote the conversion of existing market rate housing to affordable housing. Tam Valley in particular has a large number of rental units which have traditionally been at the affordable end of the rental spectrum, and could readily be maintained as such with the necessary incentives. 10. Alternative Measures: Follow the Housing Element guidelines to promote and locate alternative housing sites as per recommended policies #5, 8, and 9 above. These guidelines state that acceptable dwelling unit numbers can be counted through “the availability of ADUs and JADUs for occupancy, rather than used as offices or guest houses.” (p. 30) In addition: “Alternative adequate sites: Under limited circumstances, a local government may credit up to 25 percent of their adequate sites requirement per income category through existing units that will be: substantially rehabilitated in a multifamily rental or ownership housing complex of three or more units that are converted from non-affordable to affordable rental; preserved at levels affordable to low – or very low – income households, where the local government has provided those units with committed assistance.” (p. 30)	Email				X					X	X		X			X	
R20 - 260 Redwood Highway Frontage Road (Almonte)	ATTACHMENT from Tam Design Review Board: Suggested Additional Policies to be Included in the Housing Element: 1. Wildfire Risk: Use mathematical modeling to investigate and predict wildfire risk. Prohibit the building of housing (even ADUs) in fire critical areas. 2. Flood Risk: Prohibit new housing in areas at risk of flooding from storm surge or sea level rise. 3. Bothin Marsh: Require all new development adjacent to Bothin Marsh to supplement and follow the policies that are designed to preserve the marsh. Given the County's recent efforts to restore and preserve the marsh, it makes no sense to select a site adjacent to the marsh for any form of dense development. 4. Evacuations: Require that new housing development along Shoreline Highway trigger a study and redesign of the traffic patterns to ensure that any new housing development in that area will not worsen traffic or increase the threat to life safety during an evacuation. Any assessment of traffic impacts of emergency evacuation should include new housing developments in the City of Mill Valley, as Shoreline Highway is the only exit should East Blithedale become blocked. 5. Short Term Rentals: Eliminate short-term rentals completely, or allow only on-site, owner-occupied properties to have short-term rentals. If someone does not live on-site, then the property is arguably an investment property only, and any claim of the need for that short-term rental income can be disregarded. This would enable ADUs to be counted toward the Housing Element numbers (see item #10). 6. Vacancies: Create a County mandated vacancy tax (as San Francisco is presently considering) to create disincentives for leaving housing units empty. Exemptions could be made for work from home or dwellings under a certain square footage if the homeowner works from home or needs the space for their own dwelling use. This has been documented to establish new housing units and therefore could be counted toward the housing numbers. 7. Speculative Investment: Eliminate corporate ownership of housing of up to 4 units. This will stop speculative over-bidding of properties (which drives up housing costs) and land banking (which is performed to drive up the value for the investors.) This is crucial for market rate units that do not have controls over ownership. If dwelling units are constructed and snatched up by corporate investors, the goal of increasing availability will not be achieved. If the housing crisis is still occurring after another eight years, the next round of RHNA numbers will be even higher, and even more density will be demanded. 8. Promote Affordability: Require that all lot splits and ADUs rent at affordable rates. This would enable ADUs to be counted toward the Housing Element numbers that are required for affordable units, which are the most difficult to achieve (see item #10). The Planning Department should not look at undersized parcels as a hardship that allows for an exemption to exceed the FAR. Instead, it should be taken as a limitation on the lot that will provide a smaller home, which will ultimately result in a diverse range of housing options and levels of affordability. 9. Conversions: Provide incentives to preserve the existing stock of affordable housing and/or promote the conversion of existing market rate housing to affordable housing. Tam Valley in particular has a large number of rental units which have traditionally been at the affordable end of the rental spectrum, and could readily be maintained as such with the necessary incentives. 10. Alternative Measures: Follow the Housing Element guidelines to promote and locate alternative housing sites as per recommended policies #5, 8, and 9 above. These guidelines state that acceptable dwelling unit numbers can be counted through “the availability of ADUs and JADUs for occupancy, rather than used as offices or guest houses.” (p. 30) In addition: “Alternative adequate sites: Under limited circumstances, a local government may credit up to 25 percent of their adequate sites requirement per income category through existing units that will be: substantially rehabilitated in a multifamily rental or ownership housing complex of three or more units that are converted from non-affordable to affordable rental; preserved at levels affordable to low – or very low – income households, where the local government has provided those units with committed assistance.” (p. 30)	Email				X					X	X		X			X	
R20 - 260 Redwood Highway Frontage Road (Almonte)	I am writing to endorse the attached letter from Sustainable TamAlmonte to the Marin County Board of Supervisors and Planning Commission regarding the merits of the proposed Tam Valley, Almonte, and Manzanita Candidate Housing Sites listed in the 2023-2031 Marin County Housing Element DRAFT Candidate Housing Sites List. The need for housing our homeless is desperate but building residential space at Tam Junction is just NOT logical. The idea of building along Shoreling/ Highway 1 is very questionable. It is already a populated area with minimal sidewalks and access to needed resources. Thank you for your consideration of the attached letter	Email	X	X	X	X		X		X	X	X	X	X	X	X		
R20 - 260 Redwood Highway Frontage Road (Almonte)	The information lists only 1 Parcel, which is wrong - there are 3. It lists only 36 possible Housing units, which is wrong - it should be 36 units for Workforce or Senior units and 73 Hotel rooms, which is what the Tam Valley community Plan calls for on the larger Parcel. This site is located in the Manzanita area, not Almonte.	Email	X														X	

Location	Comment	Source	PCL	INF	SER	TRF	PRK	PTR	ACT	NMR	SEA	NAT	CUL	FIR	WAT	HLT	EQT	GDL
R21 - 204 Flamingo Road (Tamalpais)	(Comment edited for length) Sustainable TamAlmonte has the following comments and recommendations regarding the merits of the above referenced Tam Valley, Almonte, and Manzanita Candidate Housing Sites listed in the 2023-2031 Housing Element DRAFT Candidate Housing Sites List. Due to the unique characteristics of the area, encouraging residential development, especially high-density development, at the above referenced Sites would increase the risk of undue harm to the environment and undue hardship, illness, injury and/or death to the current and future residents. The Tam Valley, Almonte, and Manzanita commercial lowlands, in which the above referenced sites are located, experience the most number of environmental constraints and hazards of any area in Unincorporated Marin. Both the Marin Countywide Plan's EIR and the 2012 Housing Element's SEIR demonstrate that development at these sites would exacerbate the existing dangerous conditions and add new significant adverse environmental impacts (which) magnifies the probability that a tragedy would ensue and the multiple mitigations that a developer would need to fulfill would cause development costs to soar. These factors make the sites unsuitable for affordable housing. The only acceptable course of action is to eliminate the sites from the inventory. Below is a list of the unique natural features, hazards, and limited resources in the Tam Valley, Almonte, and Manzanita lowlands that constrain development and population growth and substantiate our argument. For a quick overview of these constraints, please view the attached table. I. Dangerous Traffic with Unacceptable Level Of Service – LOS "F" Of Local Roadways:. II. Flooding, 100 Year Floodplain, Impending Sea Level Rise III. Filled Marsh Areas With High Seismic Activity, Liquefaction, Subsidence and Mud Displacement. IV. Air Quality & Noise: Increased Risk of Residents Developing Serious Illness Due to Living Near Major Roadways. V. Hazardous Materials: For additional information regarding potential health impacts to workers and future residents who may be exposed to hazardous soil conditions, related to past uses, in Tam Junction and Manzanita, please follow the below link to read the comment letter by Technical Expert Matt Hagemann. VI. Endangered Special Status Species. VII. Insufficient Services & Public Transit. VIII. Historic Wetlands and Baylands Corridor. IX. Historic Marshland That Could Be Restored. 160 Shoreline Hwy and 260 Redwood Hwy Frontage Rd. are historic marshland. X. High Density Development Is Not Consistent With the Traditional Character Of The Local Semi-Rural Communities. Conclusion: The County now has sufficient information to understand that the proposed Tam Valley, Almonte, and Manzanita Sites are inappropriate for inclusion in the 2023-2031 Housing Element Candidate Housing Sites Inventory. Not only would construction of housing on these sites exacerbate the already existing problems but doing so when the County admits in the Marin Countywide Plan EIR and 2012 Housing Element's FSEIR that significant adverse unavoidable impacts would result from such construction defies logic. Moreover, there can be no benefit that would override the impacts of environmental harm and severe illness, injury or loss of life from building on the Tam Valley, Almonte, and Manzanita Candidate Housing Sites, which are laden with environmental constraints and dangerous hazards. The best course of action would be for the County to revise the list to reflect the current problems with traffic, seismic activity, hazardous soil conditions, air and noise pollution, water supply, flooding, and impending sea level rise and to find that no new residential development in the Tam Junction & Manzanita areas is appropriate. Such action would be consistent with the Board of Supervisors' sensible decisions.	Email (See Email Comments Received.PDF, pp. 123-151)	X	X	X	X		X		X	X	X	X	X	X	X		
R21 - 204 Flamingo Road (Tamalpais)	(Comment edited for length) Sustainable TamAlmonte has the following comments and recommendations regarding the merits of the above referenced Tam Valley, Almonte, and Manzanita Candidate Housing Sites listed in the 2023-2031 Housing Element DRAFT Candidate Housing Sites List. Due to the unique characteristics of the area, encouraging residential development, especially high-density development, at the above referenced Sites would increase the risk of undue harm to the environment and undue hardship, illness, injury and/or death to the current and future residents. The Tam Valley, Almonte, and Manzanita commercial lowlands, in which the above referenced sites are located, experience the most number of environmental constraints and hazards of any area in Unincorporated Marin. Both the Marin Countywide Plan's EIR and the 2012 Housing Element's SEIR demonstrate that development at these sites would exacerbate the existing dangerous conditions and add new significant adverse environmental impacts (which) magnifies the probability that a tragedy would ensue and the multiple mitigations that a developer would need to fulfill would cause development costs to soar. These factors make the sites unsuitable for affordable housing. The only acceptable course of action is to eliminate the sites from the inventory. Below is a list of the unique natural features, hazards, and limited resources in the Tam Valley, Almonte, and Manzanita lowlands that constrain development and population growth and substantiate our argument. For a quick overview of these constraints, please view the attached table. I. Dangerous Traffic with Unacceptable Level Of Service – LOS "F" Of Local Roadways:. II. Flooding, 100 Year Floodplain, Impending Sea Level Rise III. Filled Marsh Areas With High Seismic Activity, Liquefaction, Subsidence and Mud Displacement. IV. Air Quality & Noise: Increased Risk of Residents Developing Serious Illness Due to Living Near Major Roadways. V. Hazardous Materials: For additional information regarding potential health impacts to workers and future residents who may be exposed to hazardous soil conditions, related to past uses, in Tam Junction and Manzanita, please follow the below link to read the comment letter by Technical Expert Matt Hagemann. VI. Endangered Special Status Species. VII. Insufficient Services & Public Transit. VIII. Historic Wetlands and Baylands Corridor. IX. Historic Marshland That Could Be Restored. 160 Shoreline Hwy and 260 Redwood Hwy Frontage Rd. are historic marshland. X. High Density Development Is Not Consistent With the Traditional Character Of The Local Semi-Rural Communities. Conclusion: The County now has sufficient information to understand that the proposed Tam Valley, Almonte, and Manzanita Sites are inappropriate for inclusion in the 2023-2031 Housing Element Candidate Housing Sites Inventory. Not only would construction of housing on these sites exacerbate the already existing problems but doing so when the County admits in the Marin Countywide Plan EIR and 2012 Housing Element's FSEIR that significant adverse unavoidable impacts would result from such construction defies logic. Moreover, there can be no benefit that would override the impacts of environmental harm and severe illness, injury or loss of life from building on the Tam Valley, Almonte, and Manzanita Candidate Housing Sites, which are laden with environmental constraints and dangerous hazards. The best course of action would be for the County to revise the list to reflect the current problems with traffic, seismic activity, hazardous soil conditions, air and noise pollution, water supply, flooding, and impending sea level rise and to find that no new residential development in the Tam Junction & Manzanita areas is appropriate. Such action would be consistent with the Board of Supervisors' sensible decisions.	Email (See Email Comments Received.PDF, pp. 123-151)	X	X	X	X		X		X	X	X	X	X	X	X		

Location	Comment	Source	PCL	INF	SER	TRF	PRK	PTR	ACT	NMR	SEA	NAT	CUL	FIR	WAT	HLT	EQT	GDL
R21 - 204 Flamingo Road (Tamalpais)	(Comment edited for length) The Tam Design Review Board is charged with focusing on and supporting the provisions of the Tamalpais Area Community Plan (TACP). In addition to laying out a description of the appropriate character of the community, this plan clearly sets forth constraints specifying that environmental hazards must be taken into account in the site selection process. Indeed, this is also crucial for the viability of the adoption of the Housing Element itself. According to step #7 of the Housing Element's Site Identification Process: "Provide in the analysis a general description of any known environmental or other features (e.g., presence of floodplains, protected wetlands, oak tree preserves, very high fire hazard severity zones) that have the potential to impact the development viability of the identified sites..." p. 10. The TACP "places a strong emphasis on protecting the public safety and preserving the natural resources of the community, while still permitting individual property owners to realize reasonable development potentials" (pg. I-3). This balance is more critical today than it was in 1992 when the plan was written, with the risk of chronic flooding, impending sea level rise, and fire in the wildland-urban interface presenting an ever- greater peril to our neighborhoods. Tam Valley, Almonte, Homestead Valley, and Muir Woods Park are already viable and diverse neighborhoods, containing a range of housing from high-end single family residences to affordable apartments. Maintaining this diversity has long been a goal of the community, as expressed in Section I-C of the TACP. Added mixed use development in the Tam Junction area could, with proper planning and infrastructure update, provide needed housing which would have a minimal negative impact and enhance the community. The Housing Element should take a closer look at the potential for rezoning to achieve its goals. For those of lesser wealth to have access to the amenities available in the Tam Area, in particular good schools and proximity to jobs and open space, is a noble and important goal. There are a series of recent State laws that are aimed at helping to solve the housing crisis in California. Unfortunately, in its search for a solution to this crisis the legislature has crafted programs that offer density, height, and FAR incentives to housing developers in return for a very small number of "affordable" units without any appropriations for much needed transportation and infrastructure. There are likely to be many unintended consequences of these housing mandates which will be left to cities and counties to deal with. The most critical of these possible outcomes as they relate to the Tam area is the risk of fire and flooding and the already constricted evacuation routes in the face of such emergencies. Shoreline Highway in Tam Valley is where most of the proposed housing sites for our area lie. It is not hard to imagine the combination of a wildfire threat and high tide event occurring simultaneously, which would bring the evacuation of our entire area to a complete standstill and result in property damage and human fatalities. We further note that steadily increasing traffic impacts on Shoreline Highway from tourism continue to aggravate all these challenging conditions. While we applaud the careful consideration of available sites by MIG, as community volunteers appointed to research and uphold the values of the Tam Plan, we cannot in good conscience support the choice of the sites within our area without: 1) A detailed study of future traffic and its impacts on evacuation through Tam Junction and the Highway 101 on-ramp; 2) A careful analysis of the impact of new, medium or high-density housing on the Bothin Marsh and the risks of chronic flooding; 3) Development of a plan for Highway 1 at Manzanita and along Shoreline Highway to accommodate imminent sea level rise; and 4) Assurances that, if there is no way to avoid selecting housing sites in the Tam Plan area for development, the resulting housing will be protected from speculative investors and the potential to remove these future developments from the long-term rental market. The Tamalpais Area is so vulnerable to climate change disasters that, frankly, unless the housing built has a direct impact on resolving the housing crisis and addressing those most in need, new development will only intensify the crises of both climate risks and affordability. We understand the mandates from the State require you to make some challenging choices in selecting housing sites. In addition to placing questions of safety and environmental stewardship at the top of your agenda, we would like to suggest that you include in the current update of the Countywide Plan some further policies that will help guide County planning in the face of both State mandates and, if and when these mandates are modified, the undesirable results that might emerge. Please see the attached detailed list of policies	Email (See Email Comments Received.PDF, pp. 228-231)				X					X	X		X			X	
R21 - 204 Flamingo Road (Tamalpais)	I am writing to endorse the attached letter from Sustainable TamAlmonte to the Marin County Board of Supervisors and Planning Commission regarding the merits of the proposed Tam Valley, Almonte, and Manzanita Candidate Housing Sites listed in the 2023-2031 Marin County Housing Element DRAFT Candidate Housing Sites List. The need for housing our homeless is desperate but building residential space at Tam Junction is just NOT logical. The idea of building along Shoreling/ Highway 1 is very questionable. It is already a populated area with minimal sidewalks and access to needed resources. Thank you for your consideration of the attached letter	Email	X	X	X	X		X		X	X	X	X	X	X	X		
R21 - 204 Flamingo Road (Tamalpais)	We are writing in regard to the sites chosen for possible inclusion into county plans for housing in the Almonte/Tam Valley area of the county. Of the eight sites mentioned in your Balancing Act scenario, five are in a serious flood zone and one is located, not on, but in Richardson's Bay. Your commentary regarding the avoidance of environmental hazards has been completely ignored by whatever staff was used to choose these sites. The properties in the flood zone are 160 Shoreline, assessor's parcel # 052-041-27, 217 Shoreline, 223 Shoreline, and 204 Flamingo Rd. he site which is actually in the bay is 260 Redwood Hwy. Oddly enough, there is one property across the road from 160 Shoreline which is on solid ground. That would be the Muir Woods Lodge, a motel which actually has some open space which could be used for more housing. Why was this property ignored when lesser properties were chosen? Considering that we are familiar with the sites in the Almonte/Tam Valley area but not the rest of the county, it seems very strange that your staff has chosen properties which flood now and will continue to flood even more in the future. We wonder about your motivation in focusing on dangerous and inappropriate land. We also wonder why your staff has chosen properties which are pretty much lumped together in the same area which will further exacerbate the level F traffic problems which occur for us every day. If these sites were chosen to be close to public transportation, we would remind you that there is no viable public transportation in our area. So we would be looking forward to much more daily auto traffic. We are extremely disappointed in the Balancing Act which appears to be a distraction and of no practical value. We wonder how much time and money was wasted on promoting this ridiculous game. We also wonder how many sites in the rest of the county are totally inappropriate but are being promoted as a way to choose our fate which, as you know, is not the case. Surely, the Board of Supervisors can do better than promoting this silly distraction rather than facing what is a serious problem for the future well being of Marin County.	Email				X		X			X							
R21 - 204 Flamingo Road (Tamalpais)	We oppose new housing in the areas mentioned in Tam Junction due to flooding and traffic and possible fires, can't get out of here now. Tell Scott Wiener and his friends to move on.	Email				X					X			X				
R21 - 204 Flamingo Road (Tamalpais)	Yesterday afternoon, I had the pleasure of speaking with Ms. Clark about the wisdom (actually, the lack of it) in the choice of potential sites around Tam Junction. Last night, I participated in the "roadshow" and, as a result, I am asking for your help in following up on one matter. During the presentation by Jose Rodriguez, he mentioned that one of the "Guiding Principles" for the BOS is the consideration of "environmental hazards". It doesn't take long to recognize the hazards of sea level rise, a long history of flooding and traffic in our neighborhood, among others. But, in addition, Mr. Rodriguez made an interesting rejoinder to a question about whether certain sites can be included in this study if such sites have been previously reviewed and rejected. He was not too clear but he suggested that the State of California has some "requirements" if a previously rejected site is again brought up for analysis. I asked him to specify (1) which of the four Tam Valley sites have already been considered and rejected, and (2) what are the state's requirements (if any)--that are different or additional--that would apply to such sites. He did not have the information available to answer either question and it didn't appear to me that there would be much of an effort to research those questions and disseminate the answers. Hence, this email. Do you know the answers? If not, would you please put in motion an effort to discover the answers? It may not be dispositive, but then again, it may be important.	Email				X					X	X						
R3 - 275 Olive Avenue (Blackpoint)	I wanted to share concerns about a proposed housing element on the corner of Olive avenue and Atherton (275 Olive Ave, currently a nursery). That site is a wet meadow and not an appropriate building location for a development of 50 homes. It is already subject to frequent flooding, is essentially sitting on top of a wetland nature preserve, and is basically at sea level. If you walk out there today, it is mostly under water. The inevitable sea level rise that will impact that spot makes it, and any other sites at that elevation, inappropriate for further development. Is it alright to ask why this parcel is being considered when these conditions are well known?	Email	X							X	X	X						
R3 - 275 Olive Avenue (Blackpoint)	The consideration of this site (275 Olive Avenue) raises a concern that other similarly inappropriate sites may also be up for consideration in other parts of Marin. Would it be possible to get a list of any sites that are within 500 feet of a wetland? I studied wetland habitat restoration planning in graduate school, and was under the impression that CEQA/CWA sect 404 prevented projects from being built on top of or close to wetlands.	Email										X						

MARIN COUNTY HOUSING ELEMENT: CANDIDATE HOUSING SITES AND SELECTION PROCESS
COMMENTS RECEIVED VIA EMAIL

Location	Comment	Source	PCL	INF	SER	TRF	PRK	PTR	ACT	NMR	SEA	NAT	CUL	FIR	WAT	HLT	EQT	GDL
R5 - 299 Olive Avenue (Blackpoint)	I am just finding out about the rezoning proposal along the Atherton corridor in Novato, and since I missed the meeting, I am writing to express my deepest concern as well as how much I am against this proposal. I live at the end of Olive Avenue, close to Atherton Ave, and have for almost 40 years. I have watched the impact just a few additional homes have had in this area. I am tremendously concerned about the wildlife, and how this proposal would jeopardize their well being. It would greatly impact their ability to access food and water. More homes means more traffic, which means more animals in danger of being struck by cars. There is already too much traffic for this corridor, and I am referring to Olive Avenue as well as Atherton Avenue. These areas cannot handle more housing! Please reconsider this proposal and keep the wildlife and our open spaces preserved.	Email				X				X		X						
R5 - 299 Olive Avenue (Blackpoint)	I am writing to express my opinion on the potential construction of hundreds of new housing units along the Atherton Avenue corridor to meet the county's state-mandated housing quotas. I urge you to redirect new high-density housing to more appropriate areas with better access and infrastructure and with less adverse impacts on wildlife and existing residents: It is not sensible to add large new sources of traffic congestion directly onto Atherton Avenue, the only conduit for evacuation from surrounding neighborhoods during fire emergencies. The proposed development will impact a rich and diverse wildlife population in the area, beyond just the destruction of habitat in the footprints of new construction. Increases in road traffic, noise, and other human activity will invariably take a toll. Foxes, opossums, and raccoons regularly transit my yard at night (I live off of Atherton Ave) and the semi-rural neighborhood environment also supports deer, wild turkeys, hawks, quail, squirrels, owls, turkey vultures and other animals. These populations are assets to the natural environment of Marin County and are all sensitive to human encroachment. The potential housing development is grossly uncharacteristic of the adjacent neighborhoods in terms of density and appearance. The proposed housing locations do not have walk-to shopping and other services, which I believe should be a top priority for siting new high-density housing. The Atherton corridor is a narrow strip with very limited road access: One way in from the west; one way in from the east, and one secondary access (Olive Ave) from the south. This situation is a natural consequence of the geographic boundaries along the corridor. Loading up this narrow space with more traffic, more parking needs, more water requirements, and more sewer infrastructure – when other options exist -- does not make sense.	Email		X	X	X				X		X		X	X			
R7 - Eagle Rock Road (Strawberry)	I live on Eagle Rock Rd. It is already congested. Traffic conditions on Tiburon Blvd at most times make it difficult to enter the Eagle Rock area. At the proposed location there is a 4 way intersection, providing access to a gas station, a multi tenant commercial building, access to N. Knoll with section 8 housing (which is very busy) and the residents and providers to my neighbors and me. The proposed site is on a steep hillside making it difficult to build. There is a bus stop at the base where N. Knoll empties onto Tiburon Blvd. This may be good for your concerns, but every day there are cars parked on lower Eagle Rock Rd. using free parking to access the bus service, many use it for longer term parking when traveling out of the area. Building more units on your proposed site will increase street parking. It always does. Your proposal will increase foot traffic crossing 4 lane Tiburon Blvd. We see pedestrians, daily, risking their lives crossing to go to Strawberry Shopping Center. Sure, there is a pedestrian crossing lane, but with the traffic they are not always visible to drivers. It's a scary operation trying to cross. The traffic entering onto Tiburon Blvd. from Hwy 101 is already congested. Then add the traffic coming up from Strawberry Shopping Center. Certain times of the day you already have to wait for more than one light to get through. It seems that California fire seasons are getting longer and more intense. We could have a real discussion on that, but that is the reality today. We are located down hill from large open spaces. Our evacuation points are in Strawberry and with massive traffic also evacuating from points toward Tiburon, it could be a real disaster. Development on this plot is not a good idea.	Email				X	X		X			X		X				
R7 - Eagle Rock Road (Strawberry)	The access to the Eagle Rock Road area is already very difficult. The narrow street, especially on the lower exit side, is concerning should there be more development in the area. All it takes is one truck to completely block the exit path from this area. I am already concerned about getting out safely should a fire happen in this area which has high fire potential. With the steep hill median strip (that is constantly slipping in rain storms) there is nowhere to widen the road. These steep hillsides are not a good location for additional housing, especially multi-tenant housing. The current traffic backing up at the Tiburon Blvd/Blithedale exit is already a problem. Additional traffic at this location is not a good idea. Please remove sites R2 and R7.	Email				X				X				X				
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San Geronimo	(Comment edited for length)I attended the Wednesday evening presentation last week dealing with the State mandate for increasing housing in Marin. Clearly, you have been given a difficult task. Your introduction of the Guiding Principles and "explore strategies" was well done and appreciated. You answered most questions very well. Regretfully, time constraints didn't allow for in-depth responses and discussion. In every case, yours was the final comment and you, of necessity, moved on . . . I also wish there had been more time for comments. It was kind of you to stay later. That was appreciated and beneficial but some of us couldn't stay because we had another meeting to attend following your scheduled presentation.I have lived in the San Geronimo Valley (Lagunitas) for 60+ years. I was one of the leaders in the five year effort (1972 -77) to create a Community Plan that would preserve the Valley's rural character and natural resources and continue to be active. I was disappointed that so few homeowners from the Valley attended your presentation. Despite the county's efforts, I'm convinced that many Valley residents simply don't know about the current Plan and would be shocked to learn about it and its impact. We can rectify this problem. I request that you hold a meeting at the Lagunitas School multi-purpose room and make a presentation, with maps, and get one on one feedback from San Geronimo Valley residents and groups regarding recommendations and alternatives. In addition: I support the need for affordable housing in the San Geronimo Valley particularly for those with less than a moderate income. I support community involvement studying the issue of what, where, why and how (with the Community Plan as our guide) to deal with affordable housing in our valley, before providing any sites listing. Presbyterian Church - I cannot support the numbers proposed until I learn how much and where their property is located. Leelee and Staff: - The SGV Community Plan (CP) was developed by the Valley community over a five year period (1972 - 1977) with the help of CDA staff and adopted by the Board of Supervisors in 1977. Sections were updated in 1982. I was the CP Committee Chair for the Planning Group when we did a major/complete update in 1997. The Plans major goals have never changed -- keep the Valley rural and protect its natural resources! - See the CP pages IV-12: "Tamalpais Union High School Dist. The community would like to see this parcel remain in agricultural use." Many years ago, the Tam School Dist. needed funds and were considering selling the three undeveloped school properties they owned. They appointed a School Property Study Committee to make a recommendation composed of Kate Blickhahn - Drake High School administrator, Dale Elliott, a Forest Knolls resident and myself. The school board accepted our recommendation. They sold two school properties located in the eastern urbanized corridor and kept the Valley site for potential "agricultural use." I am not aware that their position has ever changed. Your job is to make recommendations to fulfill this new State imposed requirement. In that capacity, you need to be sure you are sensitive to every West Marin communities CP regarding their long held goals and objectives. Ours have been clearly stated in our CP since adoption in 1977. Any changes proposed must START with input from the community group that represent the community affected and come from the County working with that community. I am ccing Supervisor Rodoni and his aide Rhonda Kutter as I do not know if they are aware of some of the Valley's relevant history or the importance to Valley residents of preserving the "magical" view shed entry to our Valley "home." I look forward to working with Valley residents and you and your staff to protect and serve the San Geronimo Valley as we seek to implement changes	Email (See Email Comments Received.PDF, pp. 45-47)				X						X						X	
San Geronimo	Considering putting any housing on the site of the once San Geronimo golf course is wrong. It's too far out, creating more congestion on an already congested road. It also goes against the property zoning. In case of fire, ingress and egress would be even more impacted than it is now	Email				X								X				

Location	Comment	Source	PCL	INF	SER	TRF	PRK	PTR	ACT	NMR	SEA	NAT	CUL	FIR	WAT	HLT	EQT	GDL
Tam Valley / Almonte: Unknown-049-231-09-Marin Drive (3 Units)	(Comment edited for length) Sustainable TamAlmonte has the following comments and recommendations regarding the merits of the above referenced Tam Valley, Almonte, and Manzanita Candidate Housing Sites listed in the 2023-2031 Housing Element DRAFT Candidate Housing Sites List. Due to the unique characteristics of the area, encouraging residential development, especially high-density development, at the above referenced Sites would increase the risk of undue harm to the environment and undue hardship, illness, injury and/or death to the current and future residents. The Tam Valley, Almonte, and Manzanita commercial lowlands, in which the above referenced sites are located, experience the most number of environmental constraints and hazards of any area in Unincorporated Marin. Both the Marin Countywide Plan's EIR and the 2012 Housing Element's SEIR demonstrate that development at these sites would exacerbate the existing dangerous conditions and add new significant adverse environmental impacts (which) magnifies the probability that a tragedy would ensue and the multiple mitigations that a developer would need to fulfill would cause development costs to soar. These factors make the sites unsuitable for affordable housing. The only acceptable course of action is to eliminate the sites from the inventory. Below is a list of the unique natural features, hazards, and limited resources in the Tam Valley, Almonte, and Manzanita lowlands that constrain development and population growth and substantiate our argument. For a quick overview of these constraints, please view the attached table. I. Dangerous Traffic with Unacceptable Level Of Service – LOS "F" Of Local Roadways:. II. Flooding, 100 Year Floodplain, Impending Sea Level Rise III. Filled Marsh Areas With High Seismic Activity, Liquefaction, Subsidence and Mud Displacement. IV. Air Quality & Noise: Increased Risk of Residents Developing Serious Illness Due to Living Near Major Roadways. V. Hazardous Materials: For additional information regarding potential health impacts to workers and future residents who may be exposed to hazardous soil conditions, related to past uses, in Tam Junction and Manzanita, please follow the below link to read the comment letter by Technical Expert Matt Hagemann. VI. Endangered Special Status Species. VII. Insufficient Services & Public Transit. VIII. Historic Wetlands and Baylands Corridor. IX. Historic Marshland That Could Be Restored. 160 Shoreline Hwy and 260 Redwood Hwy Frontage Rd. are historic marshland. X. High Density Development Is Not Consistent With the Traditional Character Of The Local Semi-Rural Communities. Conclusion: The County now has sufficient information to understand that the proposed Tam Valley, Almonte, and Manzanita Sites are inappropriate for inclusion in the 2023-2031 Housing Element Candidate Housing Sites Inventory. Not only would construction of housing on these sites exacerbate the already existing problems but doing so when the County admits in the Marin Countywide Plan EIR and 2012 Housing Element's FSEIR that significant adverse unavoidable impacts would result from such construction defies logic. Moreover, there can be no benefit that would override the impacts of environmental harm and severe illness, injury or loss of life from building on the Tam Valley, Almonte, and Manzanita Candidate Housing Sites, which are laden with environmental constraints and dangerous hazards. The best course of action would be for the County to revise the list to reflect the current problems with traffic, seismic activity, hazardous soil conditions, air and noise pollution, water supply, flooding, and impending sea level rise and to find that no new residential development in the Tam Junction & Manzanita areas is appropriate. Such action would be consistent with the Board of Supervisors' sensible decisions.	Email (See Email Comments Received.PDF, pp. 123-151)	X	X	X	X		X		X	X	X	X	X	X	X		
Tam Valley / Almonte: Unknown-052-041-27-Shoreline Highway (12 Units)	(Comment edited for length) Sustainable TamAlmonte has the following comments and recommendations regarding the merits of the above referenced Tam Valley, Almonte, and Manzanita Candidate Housing Sites listed in the 2023-2031 Housing Element DRAFT Candidate Housing Sites List. Due to the unique characteristics of the area, encouraging residential development, especially high-density development, at the above referenced Sites would increase the risk of undue harm to the environment and undue hardship, illness, injury and/or death to the current and future residents. The Tam Valley, Almonte, and Manzanita commercial lowlands, in which the above referenced sites are located, experience the most number of environmental constraints and hazards of any area in Unincorporated Marin. Both the Marin Countywide Plan's EIR and the 2012 Housing Element's SEIR demonstrate that development at these sites would exacerbate the existing dangerous conditions and add new significant adverse environmental impacts (which) magnifies the probability that a tragedy would ensue and the multiple mitigations that a developer would need to fulfill would cause development costs to soar. These factors make the sites unsuitable for affordable housing. The only acceptable course of action is to eliminate the sites from the inventory. Below is a list of the unique natural features, hazards, and limited resources in the Tam Valley, Almonte, and Manzanita lowlands that constrain development and population growth and substantiate our argument. For a quick overview of these constraints, please view the attached table. I. Dangerous Traffic with Unacceptable Level Of Service – LOS "F" Of Local Roadways:. II. Flooding, 100 Year Floodplain, Impending Sea Level Rise III. Filled Marsh Areas With High Seismic Activity, Liquefaction, Subsidence and Mud Displacement. IV. Air Quality & Noise: Increased Risk of Residents Developing Serious Illness Due to Living Near Major Roadways. V. Hazardous Materials: For additional information regarding potential health impacts to workers and future residents who may be exposed to hazardous soil conditions, related to past uses, in Tam Junction and Manzanita, please follow the below link to read the comment letter by Technical Expert Matt Hagemann. VI. Endangered Special Status Species. VII. Insufficient Services & Public Transit. VIII. Historic Wetlands and Baylands Corridor. IX. Historic Marshland That Could Be Restored. 160 Shoreline Hwy and 260 Redwood Hwy Frontage Rd. are historic marshland. X. High Density Development Is Not Consistent With the Traditional Character Of The Local Semi-Rural Communities. Conclusion: The County now has sufficient information to understand that the proposed Tam Valley, Almonte, and Manzanita Sites are inappropriate for inclusion in the 2023-2031 Housing Element Candidate Housing Sites Inventory. Not only would construction of housing on these sites exacerbate the already existing problems but doing so when the County admits in the Marin Countywide Plan EIR and 2012 Housing Element's FSEIR that significant adverse unavoidable impacts would result from such construction defies logic. Moreover, there can be no benefit that would override the impacts of environmental harm and severe illness, injury or loss of life from building on the Tam Valley, Almonte, and Manzanita Candidate Housing Sites, which are laden with environmental constraints and dangerous hazards. The best course of action would be for the County to revise the list to reflect the current problems with traffic, seismic activity, hazardous soil conditions, air and noise pollution, water supply, flooding, and impending sea level rise and to find that no new residential development in the Tam Junction & Manzanita areas is appropriate. Such action would be consistent with the Board of Supervisors' sensible decisions.	Email (See Email Comments Received.PDF, pp. 123-151)	X	X	X	X		X		X	X	X	X	X	X	X		

Location	Comment	Source	PCL	INF	SER	TRF	PRK	PTR	ACT	NMR	SEA	NAT	CUL	FIR	WAT	HLT	EQT	GDL
Unknown-049-231-09-Marin Drive (3 Units) (Tam Valley / Almonte)	(Comment edited for length) Sustainable TamAlmonte has the following comments and recommendations regarding the merits of the above referenced Tam Valley, Almonte, and Manzanita Candidate Housing Sites listed in the 2023-2031 Housing Element DRAFT Candidate Housing Sites List. Due to the unique characteristics of the area, encouraging residential development, especially high-density development, at the above referenced Sites would increase the risk of undue harm to the environment and undue hardship, illness, injury and/or death to the current and future residents. The Tam Valley, Almonte, and Manzanita commercial lowlands, in which the above referenced sites are located, experience the most number of environmental constraints and hazards of any area in Unincorporated Marin. Both the Marin Countywide Plan's EIR and the 2012 Housing Element's SEIR demonstrate that development at these sites would exacerbate the existing dangerous conditions and add new significant adverse environmental impacts (which) magnifies the probability that a tragedy would ensue and the multiple mitigations that a developer would need to fulfill would cause development costs to soar. These factors make the sites unsuitable for affordable housing. The only acceptable course of action is to eliminate the sites from the inventory. Below is a list of the unique natural features, hazards, and limited resources in the Tam Valley, Almonte, and Manzanita lowlands that constrain development and population growth and substantiate our argument. For a quick overview of these constraints, please view the attached table. I. Dangerous Traffic with Unacceptable Level Of Service – LOS "F" Of Local Roadways:. II. Flooding, 100 Year Floodplain, Impending Sea Level Rise III. Filled Marsh Areas With High Seismic Activity, Liquefaction, Subsidence and Mud Displacement. IV. Air Quality & Noise: Increased Risk of Residents Developing Serious Illness Due to Living Near Major Roadways. V. Hazardous Materials: For additional information regarding potential health impacts to workers and future residents who may be exposed to hazardous soil conditions, related to past uses, in Tam Junction and Manzanita, please follow the below link to read the comment letter by Technical Expert Matt Hagemann. VI. Endangered Special Status Species. VII. Insufficient Services & Public Transit. VIII. Historic Wetlands and Baylands Corridor. IX. Historic Marshland That Could Be Restored. 160 Shoreline Hwy and 260 Redwood Hwy Frontage Rd. are historic marshland. X. High Density Development Is Not Consistent With the Traditional Character Of The Local Semi-Rural Communities. Conclusion: The County now has sufficient information to understand that the proposed Tam Valley, Almonte, and Manzanita Sites are inappropriate for inclusion in the 2023-2031 Housing Element Candidate Housing Sites Inventory. Not only would construction of housing on these sites exacerbate the already existing problems but doing so when the County admits in the Marin Countywide Plan EIR and 2012 Housing Element's FSEIR that significant adverse unavoidable impacts would result from such construction defies logic. Moreover, there can be no benefit that would override the impacts of environmental harm and severe illness, injury or loss of life from building on the Tam Valley, Almonte, and Manzanita Candidate Housing Sites, which are laden with environmental constraints and dangerous hazards. The best course of action would be for the County to revise the list to reflect the current problems with traffic, seismic activity, hazardous soil conditions, air and noise pollution, water supply, flooding, and impending sea level rise and to find that no new residential development in the Tam Junction & Manzanita areas is appropriate. Such action would be consistent with the Board of Supervisors' sensible decisions.	Email (See Email Comments Received.PDF, pp. 123-151)	X	X	X	X		X		X	X	X	X	X	X	X		
Unknown-052-041-27-Shoreline Highway (12 Units) (Tam Valley / Almonte)	(Comment edited for length) Sustainable TamAlmonte has the following comments and recommendations regarding the merits of the above referenced Tam Valley, Almonte, and Manzanita Candidate Housing Sites listed in the 2023-2031 Housing Element DRAFT Candidate Housing Sites List. Due to the unique characteristics of the area, encouraging residential development, especially high-density development, at the above referenced Sites would increase the risk of undue harm to the environment and undue hardship, illness, injury and/or death to the current and future residents. The Tam Valley, Almonte, and Manzanita commercial lowlands, in which the above referenced sites are located, experience the most number of environmental constraints and hazards of any area in Unincorporated Marin. Both the Marin Countywide Plan's EIR and the 2012 Housing Element's SEIR demonstrate that development at these sites would exacerbate the existing dangerous conditions and add new significant adverse environmental impacts (which) magnifies the probability that a tragedy would ensue and the multiple mitigations that a developer would need to fulfill would cause development costs to soar. These factors make the sites unsuitable for affordable housing. The only acceptable course of action is to eliminate the sites from the inventory. Below is a list of the unique natural features, hazards, and limited resources in the Tam Valley, Almonte, and Manzanita lowlands that constrain development and population growth and substantiate our argument. For a quick overview of these constraints, please view the attached table. I. Dangerous Traffic with Unacceptable Level Of Service – LOS "F" Of Local Roadways:. II. Flooding, 100 Year Floodplain, Impending Sea Level Rise III. Filled Marsh Areas With High Seismic Activity, Liquefaction, Subsidence and Mud Displacement. IV. Air Quality & Noise: Increased Risk of Residents Developing Serious Illness Due to Living Near Major Roadways. V. Hazardous Materials: For additional information regarding potential health impacts to workers and future residents who may be exposed to hazardous soil conditions, related to past uses, in Tam Junction and Manzanita, please follow the below link to read the comment letter by Technical Expert Matt Hagemann. VI. Endangered Special Status Species. VII. Insufficient Services & Public Transit. VIII. Historic Wetlands and Baylands Corridor. IX. Historic Marshland That Could Be Restored. 160 Shoreline Hwy and 260 Redwood Hwy Frontage Rd. are historic marshland. X. High Density Development Is Not Consistent With the Traditional Character Of The Local Semi-Rural Communities. Conclusion: The County now has sufficient information to understand that the proposed Tam Valley, Almonte, and Manzanita Sites are inappropriate for inclusion in the 2023-2031 Housing Element Candidate Housing Sites Inventory. Not only would construction of housing on these sites exacerbate the already existing problems but doing so when the County admits in the Marin Countywide Plan EIR and 2012 Housing Element's FSEIR that significant adverse unavoidable impacts would result from such construction defies logic. Moreover, there can be no benefit that would override the impacts of environmental harm and severe illness, injury or loss of life from building on the Tam Valley, Almonte, and Manzanita Candidate Housing Sites, which are laden with environmental constraints and dangerous hazards. The best course of action would be for the County to revise the list to reflect the current problems with traffic, seismic activity, hazardous soil conditions, air and noise pollution, water supply, flooding, and impending sea level rise and to find that no new residential development in the Tam Junction & Manzanita areas is appropriate. Such action would be consistent with the Board of Supervisors' sensible decisions.	Email (See Email Comments Received.PDF, pp. 123-151)	X	X	X	X		X		X	X	X	X	X	X	X		
West Marin Coastal Area	The deadline for input is unrealistic and the tool is exceedingly difficult to use. I understand the County is under pressure to meet the State mandate, however this plan is like throwing darts at a map. It fails to address critical disaster planning in advance of determining even potential site selection. Responding to the coastal zone: I find it extremely distressing that with the impact of climate related severe fire risk, drought, resource depletion, traffic, parking, lack of sewer, emergency ingress/egress, etc., that we are considering adding increased density. The tool does not allow for pinpointing houses that sit empty, or the 600 plus vacation rentals in West Marin. I support accessibility to community based housing. If there were a severe limit placed on vacation rentals in the Coast Region, clawing back on permits/allowances, a number of livable units equal to the numbers proposed would be freed up. I have lived here for 40 plus years and have seen housing go the way of increased tourism, housing stock becoming vacation/business stock and 2nd home owners with frequently vacant homes. Until the Coastal Commission understands the risks involved to increased density and supports strict limitations to vacation units/business, the problem will persist no matter how many new units are introduced. It is unfortunate that it will likely take a fire storm / evacuation disaster to illustrate the hazards compounded by sheer numbers. My cottage on the Inverness Ridge burned in 95 and the risk then was a fraction of what it is today. Driving Sir Francis Drake on a usual busy weekend, or most days during the summer, is the equivalent of coastal gridlock. Adding more units at the bottom of White's Hill, Nicasio, Point Reyes, Olema, and Inverness is placing more people in vulnerable locations. Imagine residents trying, along with thousands of visitors, to flee during an inevitable disaster on a narrow artery. Stop vacation rentals; create incentives to convert empty living units to housing stock.	Email		X		X	X			X		X		X	X		X	
West Marin Coastal Area	The housing candidate sites for our Marin coastal villages are not suitable as these sites do not have jobs, public transit or community services please consider what doubling the population of these villages would mean to public safety when electricity is out our wells cannot pump water and the many propane tanks result in a hazardous mixture. Our aquifers are undoubtedly low after these droughts it will be a strain on our coastal communities to entertain a larger population many in our village are already renting their small units let's just let SB 9 do its job.	Email		X	X			X		X		X		X	X			

Location	Comment	Source	PCL	INF	SER	TRF	PRK	PTR	ACT	NMR	SEA	NAT	CUL	FIR	WAT	HLT	EQT	GDL
West Marin Coastal Area	The proposed development and locations designated for housing in unincorporated West Marin is ill-conceived and inappropriate. This appears to be a numbers game on the part of the County and outside, contracted MIG development agency. The plan lacks consideration for or understanding of natural resources, environmental hazards and the existing community. Communities around Tomales Bay are watershed areas with drainage into the vulnerable bay, creeks and streams, the salt marshes and wildlife habitats. The proposed Cottages building site is an environmental hazard to an already contaminated salt marsh and channel leading to Chicken Ranch Beach, Tomales Bay. As a result of previous inappropriate building and filling in a salt marsh, this has been an ongoing problem for many years. The site near Vladimir's restaurant, across from Dixon Marine, is directly across from Tomales Bay and almost at sea level. This area and the road can flood during a high tide or heavy rain, draining pollution into the bay. Also the proposed building would affect the small downtown of Inverness. West Marin is served by narrow, curving, two lane access roads. For Inverness there is only one road, in or out, a problem during flooding, fires, landslides and general overcrowding on weekends and holidays. These roads frequently need repair when lanes crumble into a creek, hillside or the bay. No freeways please, as was proposed in the 60s. I have lived in Inverness since the 70s. As a single working mother, a teacher, I raised my daughter in Inverness. Over the years I have seen families and friends move away as rentals, cottages and small units were converted to more lucrative Airbnbs and second homes. There are 4 houses around me with 2 units in each. Two are completely unoccupied. Two are rarely used by their absentee owners, leaving each second unit vacant. There are many houses like this in Inverness and far too many BnBs and other short term rentals. An absentee owner might purchase a house, spend an exorbitant amount of money improving it for short term rental or investment. Possible housing is currently available. West Marin already has serious problems related to climate change, as well as overcrowding, road congestion air and noise pollution from cars, sewage and, most obviously, water. Inverness is served by water storage tanks and is already predicted by IPUD to be more of a problem this year than last. Reservoirs dry up and water pipes only move water from one drought ridden area to another. Any development is a threat to our limited water supply. The arbitrary number of proposed building in these unincorporated areas of West Marin ignores the environment, nature and roads. The plan is insensitive to the existing communities and the influence of inappropriate, even hazardous, building.	Email				X					X	X		X	X			
Woodacre	There is a lot for sale as you enter Woodacre at the intersection of Park and Railroad (and an adjacent lot that is not for sale) that would be ideal for seniors with close access to post office and grocery store and bus stop.	Email															X	X

MARIN COUNTY HOUSING ELEMENT: CANDIDATE HOUSING SITES AND SELECTION PROCESS
COMMENTS RECEIVED VIA BALANCING ACT SUBMISSION

Location	Comment	Scenario	PCL	INF	SER	TRF	PRK	PTR	ACT	NMR	SEA	NAT	CUL	FIR	WAT	HLT	EQT	GDL
A - 2754 Novato Boulevard (North Novato)	Fire risk and lack of water.	Countywide												X	X			
A - 2754 Novato Boulevard (North Novato)	The traffic on the streets between this parcel and the freeway are a congested mess already. Building in this fire zone will make inflow and outflow as well as access to emergency services so highly compacted that it will result in tragedy.	Countywide				X								X				
A - 2754 Novato Boulevard (North Novato)	This allows people to stay in Marin County whereas they are moving into Sonoma County now so I prefer this site to keep families living in Marin -- but the road needs to be widened to absorb the extra traffic and people pulling out to make left and right turns, etc. This needs nice frontage roads too for slower traffic to be able to get out onto the 101 and off safely.	Countywide																X
A - 2754 Novato Boulevard (North Novato)	Near Novato schools and infrastructure. Near freeway.	Infill																X
B - 160 Shoreline Highway (Almonte)	Another horrendous place for such a massive building. Seal level rise, Manzanita already floods almost monthly - way too much traffic on hwy 1. Stinson, muir woods, Mt. Tam and muir beach get millions of visitors. Need to build a highway to serve all that traffic, completely redesing Tam junction. And many of MV residents go through the area. Bad, bad, bad place to ram housing in.	Countywide				X					X							
B - 160 Shoreline Highway (Almonte)	As long as this area is raised so that the units are not subject to flooding and same with their cars-- parking and housing need to be built above king tides and flood levels and then that would be fine.	Countywide									X							X
B - 160 Shoreline Highway	Density closer to the city like this location is preferred. Along the highway/commuter corridor is a plus as well.	Countywide																X
B - 160 Shoreline Highway	Storymaps.arcgis.com Richardson bay resilience SLR projections and interactive map	Enviro Hazard									X							
C - 935 Sir Francis Drake Boulevard (Kentfield)	workforce housing, college student housing, family housing as long as there is parking for all their cars. Parking is key to the success of this as they need their cars to get to work and take younger kids to their schools too.	Countywide															X	X
D - Los Ranchitos Road (Los Ranchitos)	Closer to the city (than Novato) so a little less commute time. Close to bus lines. Wish it was closer to more amenities though there are a few grocery stores/markets nearby.	Countywide			X													X
D - Los Ranchitos Road (Los Ranchitos)	Higher density as close to Hwy 101 makes the most sense.	Countywide																X
D - Los Ranchitos Road (Los Ranchitos)	Is any thought given to the planning for family needs,heritage trees, drainage and creeks, earthquake and slides.? What about quality of life?Reduce the numbers and come up with healthful considerations	Countywide		X	X					X		X						
D - Los Ranchitos Road (Los Ranchitos)	There is no spare land in this neighborhood. All parcels are occupied. Streets don't have sidewalks and are narrow. Already hard to get out if there was a fire. And it is on open space. We don't have enough water for more residents at these sites. Not a good candidate for this plan.	Countywide							X	X		X		X	X			
D - Los Ranchitos Road (Los Ranchitos)	This area could handle 4 plex apartment units and this would be good for families, workforce, seniors too.	Countywide																X
D - Los Ranchitos Road (Los Ranchitos)	Why can't I adjust the number of units at this site?	Countywide																
E - 2 Jeannette Prandi Way (Lucas Valley)	Building in the southeast section of this parcel on the open fields would likely upset a lot of people in the neighborhood. The area is essentially a public park and the paths around the fields are are heavily trafficked by walkers and families. I think people would be more supportive of filling in areas in the southwest and north of the property, or replacing existing buildings/facilities with housing.	Countywide								X		X						X
E - 2 Jeannette Prandi Way (Lucas Valley)	No public transit (one road in and out) and fire risk.	Countywide						X						X				
E - 2 Jeannette Prandi Way (Lucas Valley)	This area is now Lucas Valley Park and has been since the late 1990s. Inappropriate.	Countywide										X						
E - 2 Jeannette Prandi Way (Lucas Valley)	This is already pretty far out and it would be fine for both workforce and senior housing and the seniors need to have access to good public transportation options so they can get food, to the bank, to the doctor, etc.	Countywide																X
E - 2 Jeannette Prandi Way (Lucas Valley)	this website is not a reliable way to seek community feedback. It assumes that each participant is familiar with all the sites in Marin County in order to move the housing around. Specifically on Jeannette Prandi housing, my opinion would be to expand on the low income senior housing that is already there- 50 units would likely double the existing senior housing and be plenty for the heavily trafficked LUCAS VALLEY Road and surrounding community.	Countywide															X	X
E - 2 Jeannette Prandi Way (Lucas Valley)	Unlike 55 Marinwood Avenue, the areas further West within this section of Lucas Valley would be a dangerous area for new housing. The narrow valley with strong Western Wind shares similarities with the town of Paradise and its fatal experience with Fire. The green space at Jeannette Prandi Way is the only fire break within a dense construction of highly inflammable houses (resembling the Boulder, CO, neighborhood that burned this winder). For this valley to takes its fair share of county-wide new housing, the most intelligent solution would be to redevelop 55 Marinwood.	Countywide												X				
E - 2 Jeannette Prandi Way (Lucas Valley)	the road and size of land is really good for dense suburban homes	Enviro Hazard																X
E - 2 Jeannette Prandi Way (Lucas Valley)	This area is already developed:Lucas ValleyPark. See Marin County Parks.	Enviro Hazard										X						
E - 2 Jeannette Prandi Way (Lucas Valley)	This area is now Lucas Valley Park.	Equity										X						
E - 2 Jeannette Prandi Way (Lucas Valley)	There should be. no development at this site. It's now a park--Lucas Valley Park and has been since the late 1990s. It was developed such as part of the development of the 80-unit Rotary Valley Vilage development.	Infill										X						
F - 190 A Donahue Street (Marin City)	Density closer to the city like this location is preferred. Along the highway/commuter corridor is a plus as well.	Countywide																X
F - 190 A Donahue Street (Marin City)	Ideal location close to shopping and jobs.	Countywide																X
F - 190 A Donahue Street (Marin City)	Placing additional units here wouldn't be in line with the "Address Racial Equity and Historic Patterns of Segregation" Scenario because there is already a majority of publis housing and low income units in Marin City	Equity															X	

G - 155 Marinwood Avenue (Marinwood)	I would like to see the housing that should have been built by Bridge Housing years ago for seniors and families finally get built-- it will be a great addition to the neighborhood and is very much needed.	Countywide																X
G - 155 Marinwood Avenue (Marinwood)	The redevelopment is a good idea. The blighted area will benefit from redevelopment, and I hear from neighbors that they are welcoming this idea. In the case of a fire there is a close exit to Hwy 101. I reduced the number of houses, because even with 110 units this small community is already taking a large share of the country-wide burden for new housing, and other intelligent options are available.	Countywide																X
G - 155 Marinwood Avenue (Marinwood)	this website is not a reliable way to seek community feedback. It assumes that each participant is familiar with all the sites in Marin County in order to move the housing around. Specifically on Marinwood Market housing, my opinion would be to develop this property as previously discussed many time before. I'm not sure on the details of how much housing this site can hold, but it has close freeway access and a market nearby and would be a good site for housing.	Countywide																X
G - 155 Marinwood Avenue (Marinwood)	Housing that matches the homes in the neighborhood. The market must stay	Enviro Hazard																X
H - 1565 Vendola Drive (Santa Venetia)	Senior Housing would have the least amount of impact on the traffic so this would be a nice size senior community and go along with Venetia Oaks which is there already. Food bank and Extra Food and Meals on Wheels already goes to Venetia Oaks and this is a nice area for Seniors to reside in.	Countywide																X
H - 1565 Vendola Drive (Santa Venetia)	Traffic already terrible. Close to open space. Hard to get out if there was a fire as only one road in and out. No water for more residents. Not a good candidate for this plan.	Countywide				X						X		X	X			
H - 1565 Vendola Drive (Santa Venetia)	I live in Santa Venetia and this is too many housing units for this area (North San Pedro and Vendola drive). There is already a parking problem and it is sometimes difficult to find parking in front of your own home. Also, there is traffic congestion in front of the school in the morning and afternoon . You also have to take into account that Terra Linda Northgate wants to build over 1000 units in a small area. I realize they are not part of unincorporated Marin but the quality of life will definitely decline in Santa Venetia and surrounding areas with all these additional units when you take into account the traffic and increase in population. Per the housing meeting last week it stated that Santa Venetia along with Marin City already have a high number of low income residents. Is the additional housing going to be above market housing or are you just going to continue to place all low income residents in Santa Venetia?	Enviro Hazard				X	X			X						X		
H - 1565 Vendola Drive (Santa Venetia)	Should be avoided - is within 5 ft. sea level rise projection zone by 2100	Enviro Hazard									X							
I - 251 N San Pedro Road (Santa Venetia)	I object to 251 N. San Pedro as a building site for housing. There is a school and ball field. The children and their families need the child center. The ball field is used by little league and other children playing. The neighborhood can't absorb more cars parking in it. We don't have enough parking for the people who live here or there guests. If housing need to be build in Santa Venetia why not 1565 Vendola? The old school has been vacant for years. The property is not being used at all.	Countywide			X		X											
I - 251 N San Pedro Road (Santa Venetia)	Senior housing would be the least amount of traffic congestion impact and they could take public transit to get to where they needed to go for bank, grocery, doctor, etc.	Countywide																X
I - 251 N San Pedro Road (Santa Venetia)	Traffic is already terrible in this neighborhood. Bordered by open space. Fire risk is high and it's already hard to get out with only one road in. There is not enough water for more residents. Not a good candidate for this plan.	Countywide				X						X		X	X			
I - 251 N San Pedro Road (Santa Venetia)	This site does not fit this criteria. Public transportation is limited. These units will bring 2-4 cars per unit with no ample parking which would impact NSP road and nearby neighborhoods. NSP road is only 2 lanes with many schools along the way. Adding more cars would not only add to an already congested road it would be dangerous for those walking and riding bikes	Equity				X	X	X	X									
I - 251 N San Pedro Road (Santa Venetia)	This proposed site is on a baseball field that is used by many for recreational purposes. This is a much needed baseball field. Field use is hard to come by. This field is also home to a variety of wildlife. Generations of quail. Night heron,egrets, owls hawks and many other bird species. As well as frogs coyote raccoon opossum squirrel fox deer. This site is not suitable for such a large housing project. This would significantly impact our environment	Infill			X							X						
J - 9840 State Route 1 (Olema)	Excellent location to build more housing and could support some commercial as well.	Countywide																X
J - 9840 State Route 1 (Olema)	For those who like the outdoor rural life-- seniors and workforce housing for West Marin Employees to have a place to live that is affordable, this would be very nice.	Countywide																X
J - 9840 State Route 1 (Olema)	This is a tiny rural village with very few services available including fire, medical, etc. Development must be kept to a miniumum for safety concerns.	Countywide			X							X		X				
J - 9840 State Route 1 (Olema)	Should occur on north/west side of Rt. 1 / SFD Blvd. to avoid sea level rise zones.	Enviro Hazard									X							X
J - 9840 State Route 1 (Olema)	This area is already developed. Drinking water concerns, septic concerns, fire safety and evacuation concerns. Sea level rise and climate change will exacerbate these issues at this site.	Infill								X	X			X	X			
K - 1500 Butterfield Road (Sleepy Hollow)	Housing should only be added in the valley and low hillsides. Mid to upper hillsides and ridgelines should be open space. If the housing can be kept in the valley, it would be reasonable to increase to 36 total houses. Another consideration is that traffic on Butterfield is congested. If more housing is added, then traffic lights and pedestrian crossings with warning lights should be added.	Countywide				X						X						X
K - 1500 Butterfield Road (Sleepy Hollow)	I would like to see MORE housing units here. This is the end of the line, at the end of Butterfield Road out in the country and it would be good or workforce housing and seniors as long as there was a bus line that went that far to take them to doctor appointments and shopping. It would be fine for schools--families also.	Countywide																X
K - 1500 Butterfield Road (Sleepy Hollow)	Near open space. High fire risk. Lack of water for additional residents. Traffic already terrible in and out of this area.	Countywide				X						X		X	X			
L - 26500 Main Street (Tomales)	Senior housing would do well here for those who want country rural living with access to transportation for getting food , to the bank, to the doctor-- maybe a medical clinic bus could make the rounds to these rural areas where seniors would be residing so they could get checked out and get prescriptions, check ups, shots, blood draw, etc.	Countywide																X

L - 26500 Main Street (Tomales)	Tomales does not have enough water or jobs to add this many units.	Countywide			X										X			
M - 1 St Vincents Drive(St. Vincents)	Along the 101 corridor; room for more than this number; included in Marin Housing Pan.	Countywide																X
M - 1 St Vincents Drive(St. Vincents)	I would love to see this developed for families, seniors, workforce housing-- all kinds of housing built on this site as it is perfect and beautiful and much preferable to living further out Lucas Valley road.	Countywide															X	X
M - 1 St Vincents Drive(St. Vincents)	St. Vincents consists of nearly 800 acres of land situated in the US 101 corridor. Its proximity to transportation and services makes it ideal for development of housing of all types and at all levels of affordability. The most developable portion of the St. Vincents property is that land located west of Holy Rosary Chapel--between US 101 and the Chapel. This land is on higher ground and not subject to sea level rise. Further, existing terrain provides a natural buffer such that housing can be located on the site without affecting the visual corridor; development would not be visible from US 101. This property should be further studied to determine just how many units can be accommodated here. It is the ideal site.	Countywide															X	X
M - 1 St Vincents Drive(St. Vincents)	This seems like a more economically realistic area, good access to 101 and infrastructure	Countywide																X
M - 1 St Vincents Drive(St. Vincents)	this website is not a reliable way to seek community feedback. It assumes that each participant is familiar with all the sites in Marin County in order to move the housing around. Some confusion at this site about 1800 vs 221 units- big difference. My opinion is that some development could happen at this site, but 1800 would be a huge burden to the traffic on the 101 in this area and could not be supported by the existing marinwood infrastucture	Countywide								X								X
M - 1 St Vincents Drive(St. Vincents)	Traffic is going to be a problem. Lack of water.	Countywide				X									X			
M - 1 St Vincents Drive(St. Vincents)	403 units is much less than the capacity at St Vincent's. This is an area that could absorb a mix of housing types, and is close to highway 101.	Enviro Hazard															X	X
M - 1 St Vincents Drive(St. Vincents)	Should be placed on this parcel but above 5 ft rise zone.	Enviro Hazard									X							X
M - 1 St Vincents Drive(St. Vincents)	St. Vincents consists of nearly 800 acres of land situated in the US 101 corridor. Its proximity to transportation and services makes it ideal for development of housing of all types and at all levels of affordability. The most developable portion of the St. Vincents property is that land located west of Holy Rosary Chapel--between US 101 and the Chapel. This land is on higher ground and not subject to sea level rise. Further, existing terrain provides a natural buffer such that housing can be located on the site without affecting the visual corridor; development would not be visible from US 101. This property should be further studied to determine just how many units can be accommodated here. It is the ideal site.	Enviro Hazard															X	X
M - 1 St Vincents Drive(St. Vincents)	St. Vincents consists of nearly 800 acres of land situated in the US 101 corridor. Its proximity to transportation and services makes it ideal for development of housing of all types and at all levels of affordability. The most developable portion of the St. Vincents property is that land located west of Holy Rosary Chapel--between US 101 and the Chapel. This land is on higher ground and not subject to sea level rise. Further, existing terrain provides a natural buffer such that housing can be located on the site without affecting the visual corridor; development would not be visible from US 101. This property should be further studied to determine just how many units can be accommodated here. It is the ideal site.	Enviro Hazard															X	X
M - 1 St Vincents Drive(St. Vincents)	Marin Housing plan provides for this scale of development at St Vincent.	Equity																X
M - 1 St Vincents Drive(St. Vincents)	St. Vincents consists of nearly 800 acres of land situated in the US 101 corridor. Its proximity to transportation and services makes it ideal for development of housing of all types and at all levels of affordability. The most developable portion of the St. Vincents property is that land located west of Holy Rosary Chapel--between US 101 and the Chapel. This land is on higher ground and not subject to sea level rise. Further, existing terrain provides a natural buffer such that housing can be located on the site without affecting the visual corridor; development would not be visible from US 101. This property should be further studied to determine just how many units can be accommodated here. It is the ideal site.	Equity															X	X
M - 1 St Vincents Drive(St. Vincents)	The St. Vincent's property is nearly 800 acres within the US 101 corridor--close to transportation and services, a prime location for housing. Much of the property is located at higher elevations, so not subject to sea level rise. The area with greatest potential for housing development is located west of Holy Rosary Chapel (between the Chapel and US 101), where existing terrain would shield it from view from US 101, thereby maintaining the visual corridor. This area could accommodate all levels and densities of housing as a planned development.	Equity															X	X
M - 1 St Vincents Drive(St. Vincents)	Why so many here?	Equity								X								
M - 1 St Vincents Drive(St. Vincents)	St Vincent and Siviera Ranch can accommodate this development according to Marin Housing Plan and latest final EIA (~2007?).	Infill																X
M - 1 St Vincents Drive(St. Vincents)	St. Vincents consists of nearly 800 acres of land situated in the US 101 corridor. Its proximity to transportation and services makes it ideal for development of housing of all types and at all levels of affordability. The most developable portion of the St. Vincents property is that land located west of Holy Rosary Chapel--between US 101 and the Chapel. This land is on higher ground and not subject to sea level rise. Further, existing terrain provides a natural buffer such that housing can be located on the site without affecting the visual corridor; development would not be visible from US 101. This property should be further studied to determine just how many units can be accommodated here. It is the ideal site.	Infill															X	X
N - 690 Redwood Hwy Frontage Road (Strawberry)	Strongly prefer more housing in locations like this closer to the city - where jobs are - to shorten commutes and decrease traffic sprawl. This site is also close to the highway/commuting corridor which is a plus. Density closer to the city is preferred.	Countywide																X

N - 690 Redwood Hwy Frontage Road (Strawberry)	The area marked on the frontage road is extremely narrow for any type of building. It would severely impact the stability of the established housing on the hillside above. In addition, you would have housing on a narrow strip where there isn't even room for a sidewalk. There is no ability to expand the frontage road where traffic and intersections already receive a failing grade. Looking at the geography, you are basically trying to cram housing into the already crowded bottom of the funnel. It makes no sense. There is no room for parking - and please do not feed us a line that people who live here will use public transportation and not own cars as that is never the case.	Countywide				X	X			X									
N - 690 Redwood Hwy Frontage Road (Strawberry)	The property would be fine for housing, but the increased traffic to the nearby intersections would be untenable. Specifically, the intersections of Redwood Highway Frontage Road with Seminary Drive (at the 7-Eleven) and Tiburon Blvd to the north are both overloaded, and will be several fold worse already with the planned Seminary development within Strawberry. Adding additional housing here would further overload these intersections which have no alternative routes for traffic coming to/from the area.	Countywide				X													
N - 690 Redwood Hwy Frontage Road (Strawberry)	This would be great for seniors as it is nearby public transportation and shopping. It would be good wo	Countywide																	X
O - 217 Shoreline Highway (Tamalpais)	Density closer to the city like this location is preferred. Along the highway/commuter corridor is a plus as well.	Countywide																	X
O - 217 Shoreline Highway (Tamalpais)	Senior housing as long as it is raised up high enough not to be in a flood zone and ruin their cars-- The area is congested so they couldn't build much more due to the traffic congestion.	Countywide																	X
O - 217 Shoreline Highway (Tamalpais)	Traffic is a problem.	Countywide				X													
O - 217 Shoreline Highway (Tamalpais)	Storymaps.arcgis.com Richardson bay resilience SLR projections and interactive map	Enviro Hazard									X								
P - 4900 Sir Francis Drake Boulevard (San Geronimo Valley)	4900 SFD Blvd. is an inappropriate site for housing or any kind for several reasons: It is cross crossed by streams, it is a historically agricultural property with active ag use, and it is a beloved view corridor right at the gateway of the Valley. IIThis proposal would be extremely controversial. Please consider maximizing housing at the current Woodacre fire station. From a housing advocate.	Countywide										X							
P - 4900 Sir Francis Drake Boulevard (San Geronimo Valley)	I don't think this will be feasible due to lack of infrastructure and job opportunity	Countywide		X	X														
P - 4900 Sir Francis Drake Boulevard (San Geronimo Valley)	If school property yes on number of units. Limit single family. Cluster housing preferred. Senior and low income.	Countywide																	X
P - 4900 Sir Francis Drake Boulevard (San Geronimo Valley)	No development on Sir Francis Drake in West Marin. It's already impossible to evacuate on this road.	Countywide				X									X				
P - 4900 Sir Francis Drake Boulevard (San Geronimo Valley)	No one wants to see the entrance to our Valley sullied by an enclave of homes for people earning over $132,000 a year. This location is not inside any village boundary. And this survey will not let us show zero units at this site. It allows eight units no matter what. This survey is extremely flawed!	Countywide																X	
P - 4900 Sir Francis Drake Boulevard (San Geronimo Valley)	This is a terrible place to put a bunch of housing units since there is no buffer between Sir Francis Drake and the homes. Other homes in the area are not directly visible from Sir Frances Drake as these would be and would be an unwelcome eye-sore. Most homes are at least one street off of Sir Francis Drake.	Countywide											X						
P - 4900 Sir Francis Drake Boulevard (San Geronimo Valley)	This is agricultural land and not suitable for housing. It will destroy the entrance to the Valley. Only put new housing within the village boundaries.	Countywide											X						
P - 4900 Sir Francis Drake Boulevard (San Geronimo Valley)	This is out in the middle of nowhere and so this would be good for seniors if they have good public transportation to get them to shopping, banks, doctor appointments, entertainment and if there is good internet access for them to be able to stream shows and movies and do email etc. -- Transportation is key to this remote location being a success.	Countywide																	X
P - 4900 Sir Francis Drake Boulevard (San Geronimo Valley)	This site is completely inappropriate for development in the valley. There should be 0 units in this location, I repeat zero. This site would not be "infill". It would forever mar the open space gateway to one of the most beautiful rural valleys in the world and the Point Reyes National Park. It is not within the village boundaries as required. There would be massive community protest, legal action, and resistence to developing this site.	Countywide								X		X						
P - 4900 Sir Francis Drake Boulevard (San Geronimo Valley)	Preservation of open space/ag easement here is important to SGV community.	Enviro Hazard											X						
Q - 800 Atherton Avenue (North Novato)	Encourage more building closer to the city or Richmond Bridge, where most people commute to daily. There aren't the jobs in Novato so this will lead to increased commutes and traffic. Build closer to the city and job centers.	Countywide			X	X													
Q - 800 Atherton Avenue (North Novato)	Fire danger, sensitive and endangered species in this area. Wildlife corridor.	Countywide											X		X				
Q - 800 Atherton Avenue (North Novato)	Put them all here.	Countywide																	X
Q - 800 Atherton Avenue (North Novato)	Atherton Avenue is severely affected when Route 37 floods, with several hundred additional cars travelling this route. This is an area where the county has mandated minimum lot sizes and has retained the "rural, agrarian" nature of the area. As a result there are no stop signs or street lights. Developing highly dense housing in the Atherton corridor is risky until the Hwy 37 flooding problems are fixed, and once they are the housing that is built should not be at a density above 10 units per acre given the lack of infrastructure.	Enviro Hazard		X		X					X	X							
R1 - 5800 Sir Francis Drake Boulevard (San Geronimo Valley)	Don't even think about it.	Countywide								X									

R1 - 5800 Sir Francis Drake Boulevard (San Geronimo Valley)	No public transit and fire risk.	Countywide						X						X				
R1 - 5800 Sir Francis Drake Boulevard (San Geronimo Valley)	Point Reyes is a great place to build more housing. Lovely community, local businesses would greatly benefit from more weekday patrons.	Countywide																X
R1 - 5800 Sir Francis Drake Boulevard (San Geronimo Valley)	This site should only be used for the fire dept. or for other public community services with the currently existing building. It's part of a large open space property that needs to continue to be preserved as open space in perpetuity.	Countywide										X						
R10 - 200 San Pedro Road (Santa Venetia)	Traffic already terrible here.	Countywide				X												
R11 - 110 Strawberry Drive (Strawberry)	Family Housing and workforce housing would be nice here--as long as there is plenty of parking for the new residents as parking is key --	Countywide																X
R11 - 110 Strawberry Drive (Strawberry)	Strawberry Drive is already impacted with very little ingress or egress. 28 is FAR TOO MUCH. All intersections here have a failing grade and there is no room to expand. Do not feed us a line that people living in these units will use public transportation as it has been proven time and time again that is not the case.	Countywide				X				X								
R11 - 110 Strawberry Drive (Strawberry)	Strongly prefer more housing in locations like this closer to the city - where jobs are - to shorten commutes and decrease traffic sprawl. Also like that this site is also close to the highway/commuter corridor. Density closer to the city like this location is preferred.	Countywide																X
R11 - 110 Strawberry Drive (Strawberry)	The property would be fine for housing, but the increased traffic to the nearby intersections would be untenable. Specifically, the intersections of Redwood Highway Frontage Road with Seminary Drive (at the 7-Eleven) and Tiburon Blvd to the north are both overloaded, and will be several fold worse already with the planned Seminary development within Strawberry. Adding additional housing here would further overload these intersections which have no alternative routes for traffic coming to/from the area.	Countywide				X												
R12 - Mesa Road (Bolinas)	Lack of public transportation.	Countywide						X										
R13 - 26600 State Route 1 (Tomales)	Lack of public transportation.	Countywide						X										
R14 - 13270 Sir Francis Drake Boulevard (Inverness)	sites on Tomales Bay are not suitable due to sea level rise	Enviro Hazard									X							
R14 - 13270 Sir Francis Drake Boulevard (Inverness)	This is downtown Inverness. Sea level rise, water rationing, septic concerns all point to this as a bad choice.	Infill								X	X			X	X			
R15 -12785 Sir Francis Drake Boulevard (Inverness)	Rural area with serious water availability and fire safety issues. Transportation is non-existent. Use sub/urban sites where infrastructure and infilling can be maximized.	Infill						X				X		X	X			
R16 - 60 Fifth Street (Pt. Reyes Station)	Lack of public transportation.	Countywide						X										
R16 - 60 Fifth Street (Pt. Reyes Station)	This is half of the developed commercial area in a small town, already overtaxed by tourism. Water availability is a serious question for the residents now. Septic issues exist due to a high water table. Sea level rise will impact this area. Traffic and parking problems exist today.	Infill				X	X				X				X			
R17 - 11598 State Route 1 (Pt. Reyes Station)	Lack of public transportation.	Countywide						X										
R17 - 11598 State Route 1 (Pt. Reyes Station)	no septic. no safe egress/ingress for 60 units (#100+/- cars 2 x daily). hilly topography. on watershed	Enviro Hazard				X						X		X	X			
R17 - 11598 State Route 1 (Pt. Reyes Station)	This is a rural area with serious infrastructure considerations and restrictions. Water availability is questionable, waste water concerns above a fragile creek side ecosystem. Fire danger exists. Climate change will only exacerbate these issues. Infilling urban/suburban areas is preferable.	Infill							X		X	X			X			
R18 - 375 Shoreline Highway (Tamalpais)	There is way too much traffic in Tam Junction. It is the worst place imaginable to add more housing. Everyone forgets about all the tourist traffic that has to go through Tam Junction. Muir Woods get's a million visitors a year, Muir Beach, Stinson, and Mt. Tam and MMWD all get millions of visitors and probably all of that traffic goes through Tam Junction	Countywide				X												
R18 - 375 Shoreline Highway (Tamalpais)	Traffic and fire risk are a problem.	Countywide				X								X				
R19 - Tennessee Valley Road (Tamalpais)	Density closer to the city like this location is preferred. Along the highway/commuter corridor is a plus as well.	Countywide																X
R19 - Tennessee Valley Road (Tamalpais)	Same thing, Tam junction is already slammed with traffic.	Countywide				X												
R19 - Tennessee Valley Road (Tamalpais)	Traffic is a problem.	Countywide				X												
R19 - Tennessee Valley Road (Tamalpais)	Storymaps.arcgis.com Richardson bay resilience SLR projections and interactive map	Enviro Hazard									X							
R2 - North Knoll Road and St. Thomas Drive (Strawberry)	"The access to the Eagle Rock Road area is already very difficult. The narrow street, especially on the lower exit side, is concerning should there be more development in the area. All it takes is one truck to completely block the exit path from this area. I am already concerned about getting out safely should a fire happen in this area which has high fire potential. With the steep hill median strip (that is constantly slipping in rain storms) there is nowhere to widen the road. These steep hillsides are not a good location for additional housing, especially multi-tenant housing. The current traffic backing up at the Tiburon Blvd/Blithedale exit is already a problem. Additional traffic at this location is not a good idea. Please remove sites R2 and R7."	Countywide				X				X				X				
R2 - North Knoll Road and St. Thomas Drive (Strawberry)	Access to this location is horrible. There are NO sidewalks already to and from the location. People are almost hit daily walking on North Knoll Road. There is NO ability to add sidewalks due to the topography. The streets here are narrow and you are simply adding 50+ new cars (please do not try and say this is transportation friendly and that people here won't own cars).	Countywide				X	X		X					X				

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R2 - North Knoll Road and St. Thomas Drive (Strawberry)	No infrastructure including water hook-up, endangered plant species and wildlife habitats threatened. No easy traffic access including for fire evacuation. That hillside just caught fire in 2021; noisy right next to freeway at hill due to cars and trucks revving engines to get over hill	Countywide		X		X						X		X	X			
R2 - North Knoll Road and St. Thomas Drive (Strawberry)	Strongly prefer more housing in locations like this closer to the city - where jobs are - to shorten commutes and decrease traffic sprawl. This site is also right along the highway/commuting corridor which is a plus. Density closer to the city like this location is preferred.	Countywide																X
R2 - North Knoll Road and St. Thomas Drive (Strawberry)	There is already multi unit housing in the area. Traffic is a problem.	Countywide				X				X								
R2 - North Knoll Road and St. Thomas Drive (Strawberry)	This is around the corner from where I live in Kruger Pines Retirement Home at 47 N Knoll Road and this would be a fine location for more Senior housing which is much needed for boomers born 1946-1964 who are falling into homelessness with more and more frequency. Marin Food Bank could deliver food and Extra Food too since they already come here. This would be a welcome, much needed addition to the neighborhood.	Countywide															X	X
R2 - North Knoll Road and St. Thomas Drive (Strawberry)	This is pristine natural land with an abundance of local species of wildlife.	Countywide										X						
R2 - North Knoll Road and St. Thomas Drive (Strawberry)	This site is not appropriate for high density housing. The Eagle Rock neighborhood already has traffic problems, and adding units will exacerbate those issues. This particular site is in an inaccessible extreme slope. Adding high density housing to this site will also destroy the family neighborhood surrounded by open space. Please consider repurposing more urban locations.	Countywide				X				X		X						
R20 - 260 Redwood Highway Frontage Road (Almonte)	Density closer to the city like this location is preferred. Along the highway/commuter corridor is a plus as well.	Countywide																X
R20 - 260 Redwood Highway Frontage Road (Almonte)	prone to flooding, seal level rise and traffic on 101 horrible and traffic through Tam junction horrible. Wrong place to add more housing	Countywide				X					X							
R20 - 260 Redwood Highway Frontage Road (Almonte)	Storymaps.arcgis.com Richardson bay resilience SLR projections and interactive map	Enviro Hazard									X							
R20 - 260 Redwood Highway Frontage Road (Almonte)	This Infill site that was in a Redevelopment area decades ago, is presently zoned for a Hotel, with a garage built under the building, adjacent to Richardson Bay, a 100,000 S.F. Office building on the North and a houseboat community with an Office building on the South side. A distinctively designed building with state-of-the-art innovative elements addressing Climate change, Sea level rise and other changing environmental conditions in crisis mode, such as flooding, fire, power outages, etc. could provide very convenient work force, senior and affordable Housing, together with a Hotel, consisting of several stories of coexisting living- featuring materials and components that would demonstrate how imaginative and solution oriented goals can be attained , while getting cars off the road and facilitating the use of bicycles, buses, walking and jogging to nearby destinations - while also providing jobs and educating prospective workers in the construction, maintenance and service in the hospitality Industry. The substantial fees received by the county of Marin and monies spent with the nearby merchants and businesses would be of great value to the countywide community!	Infill																X
R21 - 204 Flamingo Road (Tamalpais)	Again, Tam junction - already beyond carrying capacity. Why doesn't anyone do a traffic study? We're getting all of West Marin's traffic and MV's traffic. The entire Tam junction needs total rebuild and redesign before any additional housing is put there. This should be obvious.	Countywide				X												
R21 - 204 Flamingo Road (Tamalpais)	This looks like a good site to put 21 housing units in for seniors-- we need more senior housing and they do not go far very often and so this would not add to much traffic congestion if they were given senior housing there.	Countywide																X
R21 - 204 Flamingo Road (Tamalpais)	Storymaps.arcgis.com Richardson bay resilience SLR projections and interactive map	Enviro Hazard									X							
R22 - 2400 Sir Francis Drake Drive (Unincorporated Fairfax)	Fairfax is a terrible place to do massive development. SFD blvd is slammed with all kinds of traffic. Local and tourist traffic. Pt. Reyes, Olema, Stinson, MMWD all get millions of visitors a year- all of which travel on SFD.	Countywide				X												
R22 - 2400 Sir Francis Drake Drive (Unincorporated Fairfax)	More senior housing is needed and they would not add to the traffic congestion on Sir Francis Drake in the AM & PM peak traffic times.	Countywide																X
R22 - 2400 Sir Francis Drake Drive (Unincorporated Fairfax)	Prefer other housing closer to the highway/commuting corridor and closer to the city for shorter commute to jobs.	Countywide			X													
R3 - 275 Olive Avenue (Blackpoint)	This location is not within walking distance or near any public transit including bus stops, grocery store, gas station, or any amenities. Recommend to instead build more housing near those amenities and public transit. It is also farthest away from most of the jobs people commute to in the city or East Bay, so will increase commute times and congestion due to lack of being near any public transit. Prefer more density in other locations that are closer to the city.	Countywide			X	X		X										
R4 - 5600 Nicasio Valley Road (Nicasio)	There are lots of agricultural workers in West Marin who would benefit from affordable housing in Nicasio.	Countywide																X
R5 - 299 Olive Avenue (Blackpoint)	This location is not within walking distance or near any public transit including bus stops, grocery store, gas station, or any amenities. Recommend to instead build more housing near those amenities and public transit. It is also farthest away from most of the jobs people commute to in the city or East Bay, so will increase commute times and congestion due to lack of being near any public transit. Density in other locations closer to the city is preferred.	Countywide			X	X		X										
R6 - Donahue Street (Marin City)	Density closer to the city as in this location is preferred. Along the highway/commuter corridor is a plus as well.	Countywide																X
R6 - Donahue Street (Marin City)	Placing additional units here wouldn't be in line with the "Address Racial Equity and Historic Patterns of Segregation" Scenario because there is already a majority of publis housing and low income units in Marin City	Equity															X	

R7 - Eagle Rock Road (Strawberry)	"The access to the Eagle Rock Road area is already very difficult. The narrow street, especially on the lower exit side, is concerning should there be more development in the area. All it takes is one truck to completely block the exit path from this area. I am already concerned about getting out safely should a fire happen in this area which has high fire potential. With the steep hill median strip (that is constantly slipping in rain storms) there is nowhere to widen the road. These steep hillsides are not a good location for additional housing, especially multi-tenant housing. The current traffic backing up at the Tiburon Blvd/Blithedale exit is already a problem. Additional traffic at this location is not a good idea. Please remove sites R2 and R7."	Countywide				X				X				X				
R7 - Eagle Rock Road (Strawberry)	Eagle Rock is already pretty well built-out. The ability to turn off of the main intersection here is already hotly contested. This would be more cars with the inability to turn to go home. Do not feed us all the line that people who live here will not have cars and will only use public transportation. That never turns out to be the case.	Countywide				X	X											
R7 - Eagle Rock Road (Strawberry)	Incredibly steep terrain; no room for 32 units; no water hook-up, access or other infrastructure, which could lead to neighborhood evacuation problems in a fire-prone area; already bad traffic on tiburon boulevard; abundant wildlife with nowhere to go if you destroy their habitat	Countywide		X		X				X		X		X	X			
R7 - Eagle Rock Road (Strawberry)	Prefer more housing in locations like this closer to the city - where jobs are - to shorten commutes and decrease traffic sprawl. Also like that this site is closer to the highway/commuting corridor.	Countywide																X
R7 - Eagle Rock Road (Strawberry)	This is pristine natural land with an abundance of local species of wildlife.	Countywide										X						
R7 - Eagle Rock Road (Strawberry)	This is the next street over from me as I live in Kruger Pines 47 N Knoll Road- we would need a traffic light put at N Knoll Rd & Tiburon Blvd-- redo that intersection and make N Knoll Road a county maintained road too as it is just pot holes now and getting worse. The traffic has to be very aggressive leaving the neighborhood to make a right turn to get on the 101. There is no way to make left turns at all onto Tiburon Blvd. so that whole intersection needs to be redone. It could be family and workforce up on Eagle Rock and put the seniors on N. Knoll Road.	Countywide				X											X	X
R7 - Eagle Rock Road (Strawberry)	This site is not appropriate for high density housing. The Eagle Rock neighborhood already has traffic problems, and adding units will exacerbate those issues. This particular site is on extreme slope - likely a 30% grade. Adding high density housing to this site will also destroy the family neighborhood surrounded by open space. Please consider repurposing more urban locations.	Countywide				X				X		X						
R7 - Eagle Rock Road (Strawberry)	Traffic is horrible in this area. Also there is a lot of street parking on Eagle Rock. Adding additional housing will only cause worse conditions. The open space on ring mountain is home to many wildlife (owls, coyotes, turkey, deer and bobcats not to mention smaller animals as well.)	Countywide				X	X			X		X						
R8 - 8901 Redwood Boulevard (North Novato)	Fire risk and lack of water for more residents. This appears to be over a state park. No development on a state park.	Countywide										X		X	X			
R8 - 8901 Redwood Boulevard (North Novato)	Prefer more building down south near the city/jobs, for shorter commutes, less traffic, and less sprawl.	Countywide				X						X						
R8 - 8901 Redwood Boulevard (North Novato)	Too close to important Miwok site.	Enviro Hazard				X							X					
R9 - Sir Francis Drake Boulevard (San Quentin)	Traffic to get to the bridge is already terrible. Reroute the road going to the bridge and this would be a good location.	Countywide				X												
Total RHNA Allocation	This is far too much that is being shoved down into the funnel where there is little land available (Strawberry, Marin City). The County needs to be aggressive and pushing back on ABAG and the state. San Francisco has over 40,000 vacant properties so let Weiner deal with getting San Francisco vacancies down and stop shoving the issue onto Marin.	Countywide																

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Location	Comment	Scenario	PCL	INF	SER	TRF	PRK	PTR	ACT	NMR	SEA	NAT	CUL	FIR	WAT	HLT	EQT	GDL
A - 2754 Novato Boulevard (North Novato)	Fire risk and lack of water.	Countywide												X	X			
A - 2754 Novato Boulevard (North Novato)	The traffic on the streets between this parcel and the freeway are a congested mess already. Building in this fire zone will make inflow and outflow as well as access to emergency services so highly compacted that it will result in tragedy.	Countywide				X								X				
A - 2754 Novato Boulevard (North Novato)	This allows people to stay in Marin County whereas they are moving into Sonoma County now so I prefer this site to keep families living in Marin -- but the road needs to be widened to absorb the extra traffic and people pulling out to make left and right turns, etc. This needs nice frontage roads too for slower traffic to be able to get out onto the 101 and off safely.	Countywide																X
A - 2754 Novato Boulevard (North Novato)	Near Novato schools and infrastructure. Near freeway.	Infill																X
B - 160 Shoreline Highway (Almonte)	Another horrendous place for such a massive building. Seal level rise, Manzanita already floods almost monthly - way too much traffic on hwy 1. Stinson, muir woods, Mt. Tam and muir beach get millions of visitors. Need to build a highway to serve all that traffic, completely redesing Tam junction. And many of MV residents go through the area. Bad, bad, bad place to ram housing in.	Countywide				X					X							
B - 160 Shoreline Highway (Almonte)	As long as this area is raised so that the units are not subject to flooding and same with their cars-- parking and housing need to be built above king tides and flood levels and then that would be fine.	Countywide									X							X
B - 160 Shoreline Highway	Density closer to the city like this location is preferred. Along the highway/commuter corridor is a plus as well.	Countywide																X
B - 160 Shoreline Highway	Storymaps.arcgis.com Richardson bay resilience SLR projections and interactive map	Enviro Hazard									X							
C - 935 Sir Francis Drake Boulevard (Kentfield)	workforce housing, college student housing, family housing as long as there is parking for all their cars. Parking is key to the success of this as they need their cars to get to work and take younger kids to their schools too.	Countywide															X	X
D - Los Ranchitos Road (Los Ranchitos)	Closer to the city (than Novato) so a little less commute time. Close to bus lines. Wish it was closer to more amenities though there are a few grocery stores/markets nearby.	Countywide			X													X
D - Los Ranchitos Road (Los Ranchitos)	Higher density as close to Hwy 101 makes the most sense.	Countywide																X
D - Los Ranchitos Road (Los Ranchitos)	Is any thought given to the planning for family needs,heritage trees, drainage and creeks, earthquake and slides.? What about quality of life?Reduce the numbers and come up with healthful considerations	Countywide		X	X					X		X						
D - Los Ranchitos Road (Los Ranchitos)	There is no spare land in this neighborhood. All parcels are occupied. Streets don't have sidewalks and are narrow. Already hard to get out if there was a fire. And it is on open space. We don't have enough water for more residents at these sites. Not a good candidate for this plan.	Countywide							X	X		X		X	X			
D - Los Ranchitos Road (Los Ranchitos)	This area could handle 4 plex apartment units and this would be good for families, workforce, seniors too.	Countywide																X
D - Los Ranchitos Road (Los Ranchitos)	Why can't I adjust the number of units at this site?	Countywide																
E - 2 Jeannette Prandi Way (Lucas Valley)	Building in the southeast section of this parcel on the open fields would likely upset a lot of people in the neighborhood. The area is essentially a public park and the paths around the fields are are heavily trafficked by walkers and families. I think people would be more supportive of filling in areas in the southwest and north of the property, or replacing existing buildings/facilities with housing.	Countywide								X		X						X
E - 2 Jeannette Prandi Way (Lucas Valley)	No public transit (one road in and out) and fire risk.	Countywide						X						X				
E - 2 Jeannette Prandi Way (Lucas Valley)	This area is now Lucas Valley Park and has been since the late 1990s. Inappropriate.	Countywide										X						
E - 2 Jeannette Prandi Way (Lucas Valley)	This is already pretty far out and it would be fine for both workforce and senior housing and the seniors need to have access to good public transportation options so they can get food, to the bank, to the doctor, etc.	Countywide																X
E - 2 Jeannette Prandi Way (Lucas Valley)	this website is not a reliable way to seek community feedback. It assumes that each participant is familiar with all the sites in Marin County in order to move the housing around. Specifically on Jeannette Prandi housing, my opinion would be to expand on the low income senior housing that is already there- 50 units would likely double the existing senior housing and be plenty for the heavily trafficked LUCAS VALLEY Road and surrounding community.	Countywide															X	X
E - 2 Jeannette Prandi Way (Lucas Valley)	Unlike 55 Marinwood Avenue, the areas further West within this section of Lucas Valley would be a dangerous area for new housing. The narrow valley with strong Western Wind shares similarities with the town of Paradise and its fatal experience with Fire. The green space at Jeannette Prandi Way is the only fire break within a dense construction of highly inflammable houses (resembling the Boulder, CO, neighborhood that burned this winder). For this valley to takes its fair share of county-wide new housing, the most intelligent solution would be to redevelop 55 Marinwood.	Countywide												X				
E - 2 Jeannette Prandi Way (Lucas Valley)	the road and size of land is really good for dense suburban homes	Enviro Hazard																X
E - 2 Jeannette Prandi Way (Lucas Valley)	This area is already developed:Lucas ValleyPark. See Marin County Parks.	Enviro Hazard										X						
E - 2 Jeannette Prandi Way (Lucas Valley)	This area is now Lucas Valley Park.	Equity										X						
E - 2 Jeannette Prandi Way (Lucas Valley)	There should be. no development at this site. It's now a park--Lucas Valley Park and has been since the late 1990s. It was developed such as part of the development of the 80-unit Rotary Valley Vilage development.	Infill										X						
F - 190 A Donahue Street (Marin City)	Density closer to the city like this location is preferred. Along the highway/commuter corridor is a plus as well.	Countywide																X
F - 190 A Donahue Street (Marin City)	Ideal location close to shopping and jobs.	Countywide																X
F - 190 A Donahue Street (Marin City)	Placing additional units here wouldn't be in line with the "Address Racial Equity and Historic Patterns of Segregation" Scenario because there is already a majority of publis housing and low income units in Marin City	Equity															X	

G - 155 Marinwood Avenue (Marinwood)	I would like to see the housing that should have been built by Bridge Housing years ago for seniors and families finally get built-- it will be a great addition to the neighborhood and is very much needed.	Countywide																X
G - 155 Marinwood Avenue (Marinwood)	The redevelopment is a good idea. The blighted area will benefit from redevelopment, and I hear from neighbors that they are welcoming this idea. In the case of a fire there is a close exit to Hwy 101. I reduced the number of houses, because even with 110 units this small community is already taking a large share of the country-wide burden for new housing, and other intelligent options are available.	Countywide																X
G - 155 Marinwood Avenue (Marinwood)	this website is not a reliable way to seek community feedback. It assumes that each participant is familiar with all the sites in Marin County in order to move the housing around. Specifically on Marinwood Market housing, my opinion would be to develop this property as previously discussed many time before. I'm not sure on the details of how much housing this site can hold, but it has close freeway access and a market nearby and would be a good site for housing.	Countywide																X
G - 155 Marinwood Avenue (Marinwood)	Housing that matches the homes in the neighborhood. The market must stay	Enviro Hazard																X
H - 1565 Vendola Drive (Santa Venetia)	Senior Housing would have the least amount of impact on the traffic so this would be a nice size senior community and go along with Venetia Oaks which is there already. Food bank and Extra Food and Meals on Wheels already goes to Venetia Oaks and this is a nice area for Seniors to reside in.	Countywide																X
H - 1565 Vendola Drive (Santa Venetia)	Traffic already terrible. Close to open space. Hard to get out if there was a fire as only one road in and out. No water for more residents. Not a good candidate for this plan.	Countywide				X						X		X	X			
H - 1565 Vendola Drive (Santa Venetia)	I live in Santa Venetia and this is too many housing units for this area (North San Pedro and Vendola drive). There is already a parking problem and it is sometimes difficult to find parking in front of your own home. Also, there is traffic congestion in front of the school in the morning and afternoon . You also have to take into account that Terra Linda Northgate wants to build over 1000 units in a small area. I realize they are not part of unincorporated Marin but the quality of life will definitely decline in Santa Venetia and surrounding areas with all these additional units when you take into account the traffic and increase in population. Per the housing meeting last week it stated that Santa Venetia along with Marin City already have a high number of low income residents. Is the additional housing going to be above market housing or are you just going to continue to place all low income residents in Santa Venetia?	Enviro Hazard				X	X			X						X		
H - 1565 Vendola Drive (Santa Venetia)	Should be avoided - is within 5 ft. sea level rise projection zone by 2100	Enviro Hazard									X							
I - 251 N San Pedro Road (Santa Venetia)	I object to 251 N. San Pedro as a building site for housing. There is a school and ball field. The children and their families need the child center. The ball field is used by little league and other children playing. The neighborhood can't absorb more cars parking in it. We don't have enough parking for the people who live here or there guests. If housing need to be build in Santa Venetia why not 1565 Vendola? The old school has been vacant for years. The property is not being used at all.	Countywide			X		X											
I - 251 N San Pedro Road (Santa Venetia)	Senior housing would be the least amount of traffic congestion impact and they could take public transit to get to where they needed to go for bank, grocery, doctor, etc.	Countywide																X
I - 251 N San Pedro Road (Santa Venetia)	Traffic is already terrible in this neighborhood. Bordered by open space. Fire risk is high and it's already hard to get out with only one road in. There is not enough water for more residents. Not a good candidate for this plan.	Countywide				X						X		X	X			
I - 251 N San Pedro Road (Santa Venetia)	This site does not fit this criteria. Public transportation is limited. These units will bring 2-4 cars per unit with no ample parking which would impact NSP road and nearby neighborhoods. NSP road is only 2 lanes with many schools along the way. Adding more cars would not only add to an already congested road it would be dangerous for those walking and riding bikes	Equity				X	X	X	X									
I - 251 N San Pedro Road (Santa Venetia)	This proposed site is on a baseball field that is used by many for recreational purposes. This is a much needed baseball field. Field use is hard to come by. This field is also home to a variety of wildlife. Generations of quail. Night heron,egrets, owls hawks and many other bird species. As well as frogs coyote raccoon opossum squirrel fox deer. This site is not suitable for such a large housing project. This would significantly impact our environment	Infill			X							X						
J - 9840 State Route 1 (Olema)	Excellent location to build more housing and could support some commercial as well.	Countywide																X
J - 9840 State Route 1 (Olema)	For those who like the outdoor rural life-- seniors and workforce housing for West Marin Employees to have a place to live that is affordable, this would be very nice.	Countywide																X
J - 9840 State Route 1 (Olema)	This is a tiny rural village with very few services available including fire, medical, etc. Development must be kept to a miniumum for safety concerns.	Countywide			X							X		X				
J - 9840 State Route 1 (Olema)	Should occur on north/west side of Rt. 1 / SFD Blvd. to avoid sea level rise zones.	Enviro Hazard									X							X
J - 9840 State Route 1 (Olema)	This area is already developed. Drinking water concerns, septic concerns, fire safety and evacuation concerns. Sea level rise and climate change will exacerbate these issues at this site.	Infill								X	X			X	X			
K - 1500 Butterfield Road (Sleepy Hollow)	Housing should only be added in the valley and low hillsides. Mid to upper hillsides and ridgelines should be open space. If the housing can be kept in the valley, it would be reasonable to increase to 36 total houses. Another consideration is that traffic on Butterfield is congested. If more housing is added, then traffic lights and pedestrian crossings with warning lights should be added.	Countywide				X						X						X
K - 1500 Butterfield Road (Sleepy Hollow)	I would like to see MORE housing units here. This is the end of the line, at the end of Butterfield Road out in the country and it would be good or workforce housing and seniors as long as there was a bus line that went that far to take them to doctor appointments and shopping. It would be fine for schools--families also.	Countywide																X
K - 1500 Butterfield Road (Sleepy Hollow)	Near open space. High fire risk. Lack of water for additional residents. Traffic already terrible in and out of this area.	Countywide				X						X		X	X			
L - 26500 Main Street (Tomales)	Senior housing would do well here for those who want country rural living with access to transportation for getting food , to the bank, to the doctor-- maybe a medical clinic bus could make the rounds to these rural areas where seniors would be residing so they could get checked out and get prescriptions, check ups, shots, blood draw, etc.	Countywide																X

L - 26500 Main Street (Tomales)	Tomales does not have enough water or jobs to add this many units.	Countywide			X										X			
M - 1 St Vincents Drive(St. Vincents)	Along the 101 corridor; room for more than this number; included in Marin Housing Pan.	Countywide																X
M - 1 St Vincents Drive(St. Vincents)	I would love to see this developed for families, seniors, workforce housing-- all kinds of housing built on this site as it is perfect and beautiful and much preferable to living further out Lucas Valley road.	Countywide															X	X
M - 1 St Vincents Drive(St. Vincents)	St. Vincents consists of nearly 800 acres of land situated in the US 101 corridor. Its proximity to transportation and services makes it ideal for development of housing of all types and at all levels of affordability. The most developable portion of the St. Vincents property is that land located west of Holy Rosary Chapel--between US 101 and the Chapel. This land is on higher ground and not subject to sea level rise. Further, existing terrain provides a natural buffer such that housing can be located on the site without affecting the visual corridor; development would not be visible from US 101. This property should be further studied to determine just how many units can be accommodated here. It is the ideal site.	Countywide															X	X
M - 1 St Vincents Drive(St. Vincents)	This seems like a more economically realistic area, good access to 101 and infrastructure	Countywide																X
M - 1 St Vincents Drive(St. Vincents)	this website is not a reliable way to seek community feedback. It assumes that each participant is familiar with all the sites in Marin County in order to move the housing around. Some confusion at this site about 1800 vs 221 units- big difference. My opinion is that some development could happen at this site, but 1800 would be a huge burden to the traffic on the 101 in this area and could not be supported by the existing marinwood infrastucture	Countywide								X								X
M - 1 St Vincents Drive(St. Vincents)	Traffic is going to be a problem. Lack of water.	Countywide				X									X			
M - 1 St Vincents Drive(St. Vincents)	403 units is much less than the capacity at St Vincent's. This is an area that could absorb a mix of housing types, and is close to highway 101.	Enviro Hazard															X	X
M - 1 St Vincents Drive(St. Vincents)	Should be placed on this parcel but above 5 ft rise zone.	Enviro Hazard									X							X
M - 1 St Vincents Drive(St. Vincents)	St. Vincents consists of nearly 800 acres of land situated in the US 101 corridor. Its proximity to transportation and services makes it ideal for development of housing of all types and at all levels of affordability. The most developable portion of the St. Vincents property is that land located west of Holy Rosary Chapel--between US 101 and the Chapel. This land is on higher ground and not subject to sea level rise. Further, existing terrain provides a natural buffer such that housing can be located on the site without affecting the visual corridor; development would not be visible from US 101. This property should be further studied to determine just how many units can be accommodated here. It is the ideal site.	Enviro Hazard															X	X
M - 1 St Vincents Drive(St. Vincents)	St. Vincents consists of nearly 800 acres of land situated in the US 101 corridor. Its proximity to transportation and services makes it ideal for development of housing of all types and at all levels of affordability. The most developable portion of the St. Vincents property is that land located west of Holy Rosary Chapel--between US 101 and the Chapel. This land is on higher ground and not subject to sea level rise. Further, existing terrain provides a natural buffer such that housing can be located on the site without affecting the visual corridor; development would not be visible from US 101. This property should be further studied to determine just how many units can be accommodated here. It is the ideal site.	Enviro Hazard															X	X
M - 1 St Vincents Drive(St. Vincents)	Marin Housing plan provides for this scale of development at St Vincent.	Equity																X
M - 1 St Vincents Drive(St. Vincents)	St. Vincents consists of nearly 800 acres of land situated in the US 101 corridor. Its proximity to transportation and services makes it ideal for development of housing of all types and at all levels of affordability. The most developable portion of the St. Vincents property is that land located west of Holy Rosary Chapel--between US 101 and the Chapel. This land is on higher ground and not subject to sea level rise. Further, existing terrain provides a natural buffer such that housing can be located on the site without affecting the visual corridor; development would not be visible from US 101. This property should be further studied to determine just how many units can be accommodated here. It is the ideal site.	Equity															X	X
M - 1 St Vincents Drive(St. Vincents)	The St. Vincent's property is nearly 800 acres within the US 101 corridor--close to transportation and services, a prime location for housing. Much of the property is located at higher elevations, so not subject to sea level rise. The area with greatest potential for housing development is located west of Holy Rosary Chapel (between the Chapel and US 101), where existing terrain would shield it from view from US 101, thereby maintaining the visual corridor. This area could accommodate all levels and densities of housing as a planned development.	Equity															X	X
M - 1 St Vincents Drive(St. Vincents)	Why so many here?	Equity								X								
M - 1 St Vincents Drive(St. Vincents)	St Vincent and Siviera Ranch can accommodate this development according to Marin Housing Plan and latest final EIA (~2007?).	Infill																X
M - 1 St Vincents Drive(St. Vincents)	St. Vincents consists of nearly 800 acres of land situated in the US 101 corridor. Its proximity to transportation and services makes it ideal for development of housing of all types and at all levels of affordability. The most developable portion of the St. Vincents property is that land located west of Holy Rosary Chapel--between US 101 and the Chapel. This land is on higher ground and not subject to sea level rise. Further, existing terrain provides a natural buffer such that housing can be located on the site without affecting the visual corridor; development would not be visible from US 101. This property should be further studied to determine just how many units can be accommodated here. It is the ideal site.	Infill															X	X
N - 690 Redwood Hwy Frontage Road (Strawberry)	Strongly prefer more housing in locations like this closer to the city - where jobs are - to shorten commutes and decrease traffic sprawl. This site is also close to the highway/commuting corridor which is a plus. Density closer to the city is preferred.	Countywide																X

N - 690 Redwood Hwy Frontage Road (Strawberry)	The area marked on the frontage road is extremely narrow for any type of building. It would severely impact the stability of the established housing on the hillside above. In addition, you would have housing on a narrow strip where there isn't even room for a sidewalk. There is no ability to expand the frontage road where traffic and intersections already receive a failing grade. Looking at the geography, you are basically trying to cram housing into the already crowded bottom of the funnel. It makes no sense. There is no room for parking - and please do not feed us a line that people who live here will use public transportation and not own cars as that is never the case.	Countywide				X	X			X									
N - 690 Redwood Hwy Frontage Road (Strawberry)	The property would be fine for housing, but the increased traffic to the nearby intersections would be untenable. Specifically, the intersections of Redwood Highway Frontage Road with Seminary Drive (at the 7-Eleven) and Tiburon Blvd to the north are both overloaded, and will be several fold worse already with the planned Seminary development within Strawberry. Adding additional housing here would further overload these intersections which have no alternative routes for traffic coming to/from the area.	Countywide				X													
N - 690 Redwood Hwy Frontage Road (Strawberry)	This would be great for seniors as it is nearby public transportation and shopping. It would be good wo	Countywide																	X
O - 217 Shoreline Highway (Tamalpais)	Density closer to the city like this location is preferred. Along the highway/commuter corridor is a plus as well.	Countywide																	X
O - 217 Shoreline Highway (Tamalpais)	Senior housing as long as it is raised up high enough not to be in a flood zone and ruin their cars-- The area is congested so they couldn't build much more due to the traffic congestion.	Countywide																	X
O - 217 Shoreline Highway (Tamalpais)	Traffic is a problem.	Countywide				X													
O - 217 Shoreline Highway (Tamalpais)	Storymaps.arcgis.com Richardson bay resilience SLR projections and interactive map	Enviro Hazard									X								
P - 4900 Sir Francis Drake Boulevard (San Geronimo Valley)	4900 SFD Blvd. is an inappropriate site for housing or any kind for several reasons: It is cross crossed by streams, it is a historically agricultural property with active ag use, and it is a beloved view corridor right at the gateway of the Valley. IIThis proposal would be extremely controversial. Please consider maximizing housing at the current Woodacre fire station. From a housing advocate.	Countywide										X							
P - 4900 Sir Francis Drake Boulevard (San Geronimo Valley)	I don't think this will be feasible due to lack of infrastructure and job opportunity	Countywide		X	X														
P - 4900 Sir Francis Drake Boulevard (San Geronimo Valley)	If school property yes on number of units. Limit single family. Cluster housing preferred. Senior and low income.	Countywide																	X
P - 4900 Sir Francis Drake Boulevard (San Geronimo Valley)	No development on Sir Francis Drake in West Marin. It's already impossible to evacuate on this road.	Countywide				X									X				
P - 4900 Sir Francis Drake Boulevard (San Geronimo Valley)	No one wants to see the entrance to our Valley sullied by an enclave of homes for people earning over $132,000 a year. This location is not inside any village boundary. And this survey will not let us show zero units at this site. It allows eight units no matter what. This survey is extremely flawed!	Countywide																X	
P - 4900 Sir Francis Drake Boulevard (San Geronimo Valley)	This is a terrible place to put a bunch of housing units since there is no buffer between Sir Francis Drake and the homes. Other homes in the area are not directly visible from Sir Frances Drake as these would be and would be an unwelcome eye-sore. Most homes are at least one street off of Sir Francis Drake.	Countywide											X						
P - 4900 Sir Francis Drake Boulevard (San Geronimo Valley)	This is agricultural land and not suitable for housing. It will destroy the entrance to the Valley. Only put new housing within the village boundaries.	Countywide											X						
P - 4900 Sir Francis Drake Boulevard (San Geronimo Valley)	This is out in the middle of nowhere and so this would be good for seniors if they have good public transportation to get them to shopping, banks, doctor appointments, entertainment and if there is good internet access for them to be able to stream shows and movies and do email etc. -- Transportation is key to this remote location being a success.	Countywide																	X
P - 4900 Sir Francis Drake Boulevard (San Geronimo Valley)	This site is completely inappropriate for development in the valley. There should be 0 units in this location, I repeat zero. This site would not be "infill". It would forever mar the open space gateway to one of the most beautiful rural valleys in the world and the Point Reyes National Park. It is not within the village boundaries as required. There would be massive community protest, legal action, and resistence to developing this site.	Countywide								X		X						
P - 4900 Sir Francis Drake Boulevard (San Geronimo Valley)	Preservation of open space/ag easement here is important to SGV community.	Enviro Hazard											X						
Q - 800 Atherton Avenue (North Novato)	Encourage more building closer to the city or Richmond Bridge, where most people commute to daily. There aren't the jobs in Novato so this will lead to increased commutes and traffic. Build closer to the city and job centers.	Countywide			X	X													
Q - 800 Atherton Avenue (North Novato)	Fire danger, sensitive and endangered species in this area. Wildlife corridor.	Countywide											X		X				
Q - 800 Atherton Avenue (North Novato)	Put them all here.	Countywide																	X
Q - 800 Atherton Avenue (North Novato)	Atherton Avenue is severely affected when Route 37 floods, with several hundred additional cars travelling this route. This is an area where the county has mandated minimum lot sizes and has retained the "rural, agrarian" nature of the area. As a result there are no stop signs or street lights. Developing highly dense housing in the Atherton corridor is risky until the Hwy 37 flooding problems are fixed, and once they are the housing that is built should not be at a density above 10 units per acre given the lack of infrastructure.	Enviro Hazard		X		X					X	X							
R1 - 5800 Sir Francis Drake Boulevard (San Geronimo Valley)	Don't even think about it.	Countywide								X									

R1 - 5800 Sir Francis Drake Boulevard (San Geronimo Valley)	No public transit and fire risk.	Countywide						X						X				
R1 - 5800 Sir Francis Drake Boulevard (San Geronimo Valley)	Point Reyes is a great place to build more housing. Lovely community, local businesses would greatly benefit from more weekday patrons.	Countywide																X
R1 - 5800 Sir Francis Drake Boulevard (San Geronimo Valley)	This site should only be used for the fire dept. or for other public community services with the currently existing building. It's part of a large open space property that needs to continue to be preserved as open space in perpetuity.	Countywide										X						
R10 - 200 San Pedro Road (Santa Venetia)	Traffic already terrible here.	Countywide				X												
R11 - 110 Strawberry Drive (Strawberry)	Family Housing and workforce housing would be nice here--as long as there is plenty of parking for the new residents as parking is key --	Countywide																X
R11 - 110 Strawberry Drive (Strawberry)	Strawberry Drive is already impacted with very little ingress or egress. 28 is FAR TOO MUCH. All intersections here have a failing grade and there is no room to expand. Do not feed us a line that people living in these units will use public transportation as it has been proven time and time again that is not the case.	Countywide				X				X								
R11 - 110 Strawberry Drive (Strawberry)	Strongly prefer more housing in locations like this closer to the city - where jobs are - to shorten commutes and decrease traffic sprawl. Also like that this site is also close to the highway/commuter corridor. Density closer to the city like this location is preferred.	Countywide																X
R11 - 110 Strawberry Drive (Strawberry)	The property would be fine for housing, but the increased traffic to the nearby intersections would be untenable. Specifically, the intersections of Redwood Highway Frontage Road with Seminary Drive (at the 7-Eleven) and Tiburon Blvd to the north are both overloaded, and will be several fold worse already with the planned Seminary development within Strawberry. Adding additional housing here would further overload these intersections which have no alternative routes for traffic coming to/from the area.	Countywide				X												
R12 - Mesa Road (Bolinas)	Lack of public transportation.	Countywide						X										
R13 - 26600 State Route 1 (Tomales)	Lack of public transportation.	Countywide						X										
R14 - 13270 Sir Francis Drake Boulevard (Inverness)	sites on Tomales Bay are not suitable due to sea level rise	Enviro Hazard									X							
R14 - 13270 Sir Francis Drake Boulevard (Inverness)	This is downtown Inverness. Sea level rise, water rationing, septic concerns all point to this as a bad choice.	Infill								X	X			X	X			
R15 -12785 Sir Francis Drake Boulevard (Inverness)	Rural area with serious water availability and fire safety issues. Transportation is non-existent. Use sub/urban sites where infrastructure and infilling can be maximized.	Infill						X				X		X	X			
R16 - 60 Fifth Street (Pt. Reyes Station)	Lack of public transportation.	Countywide						X										
R16 - 60 Fifth Street (Pt. Reyes Station)	This is half of the developed commercial area in a small town, already overtaxed by tourism. Water availability is a serious question for the residents now. Septic issues exist due to a high water table. Sea level rise will impact this area. Traffic and parking problems exist today.	Infill				X	X				X				X			
R17 - 11598 State Route 1 (Pt. Reyes Station)	Lack of public transportation.	Countywide						X										
R17 - 11598 State Route 1 (Pt. Reyes Station)	no septic. no safe egress/ingress for 60 units (#100+/- cars 2 x daily). hilly topography. on watershed	Enviro Hazard				X						X		X	X			
R17 - 11598 State Route 1 (Pt. Reyes Station)	This is a rural area with serious infrastructure considerations and restrictions. Water availability is questionable, waste water concerns above a fragile creek side ecosystem. Fire danger exists. Climate change will only exacerbate these issues. Infilling urban/suburban areas is preferable.	Infill							X		X	X			X			
R18 - 375 Shoreline Highway (Tamalpais)	There is way too much traffic in Tam Junction. It is the worst place imaginable to add more housing. Everyone forgets about all the tourist traffic that has to go through Tam Junction. Muir Woods get's a million visitors a year, Muir Beach, Stinson, and Mt. Tam and MMWD all get millions of visitors and probably all of that traffic goes through Tam Junction	Countywide				X												
R18 - 375 Shoreline Highway (Tamalpais)	Traffic and fire risk are a problem.	Countywide				X								X				
R19 - Tennessee Valley Road (Tamalpais)	Density closer to the city like this location is preferred. Along the highway/commuter corridor is a plus as well.	Countywide																X
R19 - Tennessee Valley Road (Tamalpais)	Same thing, Tam junction is already slammed with traffic.	Countywide				X												
R19 - Tennessee Valley Road (Tamalpais)	Traffic is a problem.	Countywide				X												
R19 - Tennessee Valley Road (Tamalpais)	Storymaps.arcgis.com Richardson bay resilience SLR projections and interactive map	Enviro Hazard									X							
R2 - North Knoll Road and St. Thomas Drive (Strawberry)	"The access to the Eagle Rock Road area is already very difficult. The narrow street, especially on the lower exit side, is concerning should there be more development in the area. All it takes is one truck to completely block the exit path from this area. I am already concerned about getting out safely should a fire happen in this area which has high fire potential. With the steep hill median strip (that is constantly slipping in rain storms) there is nowhere to widen the road. These steep hillsides are not a good location for additional housing, especially multi-tenant housing. The current traffic backing up at the Tiburon Blvd/Blithedale exit is already a problem. Additional traffic at this location is not a good idea. Please remove sites R2 and R7."	Countywide				X				X				X				
R2 - North Knoll Road and St. Thomas Drive (Strawberry)	Access to this location is horrible. There are NO sidewalks already to and from the location. People are almost hit daily walking on North Knoll Road. There is NO ability to add sidewalks due to the topography. The streets here are narrow and you are simply adding 50+ new cars (please do not try and say this is transportation friendly and that people here won't own cars).	Countywide				X	X		X					X				

MARIN COUNTY HOUSING ELEMENT: CANDIDATE HOUSING SITES AND SELECTION PROCESS
COMMENTS RECEIVED VIA BALANCING ACT SUBMISSION

R2 - North Knoll Road and St. Thomas Drive (Strawberry)	No infrastructure including water hook-up, endangered plant species and wildlife habitats threatened. No easy traffic access including for fire evacuation. That hillside just caught fire in 2021; noisy right next to freeway at hill due to cars and trucks revving engines to get over hill	Countywide		X		X						X		X	X			
R2 - North Knoll Road and St. Thomas Drive (Strawberry)	Strongly prefer more housing in locations like this closer to the city - where jobs are - to shorten commutes and decrease traffic sprawl. This site is also right along the highway/commuting corridor which is a plus. Density closer to the city like this location is preferred.	Countywide																X
R2 - North Knoll Road and St. Thomas Drive (Strawberry)	There is already multi unit housing in the area. Traffic is a problem.	Countywide				X				X								
R2 - North Knoll Road and St. Thomas Drive (Strawberry)	This is around the corner from where I live in Kruger Pines Retirement Home at 47 N Knoll Road and this would be a fine location for more Senior housing which is much needed for boomers born 1946-1964 who are falling into homelessness with more and more frequency. Marin Food Bank could deliver food and Extra Food too since they already come here. This would be a welcome, much needed addition to the neighborhood.	Countywide															X	X
R2 - North Knoll Road and St. Thomas Drive (Strawberry)	This is pristine natural land with an abundance of local species of wildlife.	Countywide										X						
R2 - North Knoll Road and St. Thomas Drive (Strawberry)	This site is not appropriate for high density housing. The Eagle Rock neighborhood already has traffic problems, and adding units will exacerbate those issues. This particular site is in an inaccessible extreme slope. Adding high density housing to this site will also destroy the family neighborhood surrounded by open space. Please consider repurposing more urban locations.	Countywide				X				X		X						
R20 - 260 Redwood Highway Frontage Road (Almonte)	Density closer to the city like this location is preferred. Along the highway/commuter corridor is a plus as well.	Countywide																X
R20 - 260 Redwood Highway Frontage Road (Almonte)	prone to flooding, seal level rise and traffic on 101 horrible and traffic through Tam junction horrible. Wrong place to add more housing	Countywide				X					X							
R20 - 260 Redwood Highway Frontage Road (Almonte)	Storymaps.arcgis.com Richardson bay resilience SLR projections and interactive map	Enviro Hazard									X							
R20 - 260 Redwood Highway Frontage Road (Almonte)	This Infill site that was in a Redevelopment area decades ago, is presently zoned for a Hotel, with a garage built under the building, adjacent to Richardson Bay, a 100,000 S.F. Office building on the North and a houseboat community with an Office building on the South side. A distinctively designed building with state-of-the-art innovative elements addressing Climate change, Sea level rise and other changing environmental conditions in crisis mode, such as flooding, fire, power outages, etc. could provide very convenient work force, senior and affordable Housing, together with a Hotel, consisting of several stories of coexisting living- featuring materials and components that would demonstrate how imaginative and solution oriented goals can be attained , while getting cars off the road and facilitating the use of bicycles, buses, walking and jogging to nearby destinations - while also providing jobs and educating prospective workers in the construction, maintenance and service in the hospitality Industry. The substantial fees received by the county of Marin and monies spent with the nearby merchants and businesses would be of great value to the countywide community!	Infill																X
R21 - 204 Flamingo Road (Tamalpais)	Again, Tam junction - already beyond carrying capacity. Why doesn't anyone do a traffic study? We're getting all of West Marin's traffic and MV's traffic. The entire Tam junction needs total rebuild and redesign before any additional housing is put there. This should be obvious.	Countywide				X												
R21 - 204 Flamingo Road (Tamalpais)	This looks like a good site to put 21 housing units in for seniors-- we need more senior housing and they do not go far very often and so this would not add to much traffic congestion if they were given senior housing there.	Countywide																X
R21 - 204 Flamingo Road (Tamalpais)	Storymaps.arcgis.com Richardson bay resilience SLR projections and interactive map	Enviro Hazard									X							
R22 - 2400 Sir Francis Drake Drive (Unincorporated Fairfax)	Fairfax is a terrible place to do massive development. SFD blvd is slammed with all kinds of traffic. Local and tourist traffic. Pt. Reyes, Olema, Stinson, MMWD all get millions of visitors a year- all of which travel on SFD.	Countywide				X												
R22 - 2400 Sir Francis Drake Drive (Unincorporated Fairfax)	More senior housing is needed and they would not add to the traffic congestion on Sir Francis Drake in the AM & PM peak traffic times.	Countywide																X
R22 - 2400 Sir Francis Drake Drive (Unincorporated Fairfax)	Prefer other housing closer to the highway/commuting corridor and closer to the city for shorter commute to jobs.	Countywide			X													
R3 - 275 Olive Avenue (Blackpoint)	This location is not within walking distance or near any public transit including bus stops, grocery store, gas station, or any amenities. Recommend to instead build more housing near those amenities and public transit. It is also farthest away from most of the jobs people commute to in the city or East Bay, so will increase commute times and congestion due to lack of being near any public transit. Prefer more density in other locations that are closer to the city.	Countywide			X	X		X										
R4 - 5600 Nicasio Valley Road (Nicasio)	There are lots of agricultural workers in West Marin who would benefit from affordable housing in Nicasio.	Countywide																X
R5 - 299 Olive Avenue (Blackpoint)	This location is not within walking distance or near any public transit including bus stops, grocery store, gas station, or any amenities. Recommend to instead build more housing near those amenities and public transit. It is also farthest away from most of the jobs people commute to in the city or East Bay, so will increase commute times and congestion due to lack of being near any public transit. Density in other locations closer to the city is preferred.	Countywide			X	X		X										
R6 - Donahue Street (Marin City)	Density closer to the city as in this location is preferred. Along the highway/commuter corridor is a plus as well.	Countywide																X
R6 - Donahue Street (Marin City)	Placing additional units here wouldn't be in line with the "Address Racial Equity and Historic Patterns of Segregation" Scenario because there is already a majority of publis housing and low income units in Marin City	Equity															X	

R7 - Eagle Rock Road (Strawberry)	"The access to the Eagle Rock Road area is already very difficult. The narrow street, especially on the lower exit side, is concerning should there be more development in the area. All it takes is one truck to completely block the exit path from this area. I am already concerned about getting out safely should a fire happen in this area which has high fire potential. With the steep hill median strip (that is constantly slipping in rain storms) there is nowhere to widen the road. These steep hillsides are not a good location for additional housing, especially multi-tenant housing. The current traffic backing up at the Tiburon Blvd/Blithedale exit is already a problem. Additional traffic at this location is not a good idea. Please remove sites R2 and R7."	Countywide				X				X				X				
R7 - Eagle Rock Road (Strawberry)	Eagle Rock is already pretty well built-out. The ability to turn off of the main intersection here is already hotly contested. This would be more cars with the inability to turn to go home. Do not feed us all the line that people who live here will not have cars and will only use public transportation. That never turns out to be the case.	Countywide				X	X											
R7 - Eagle Rock Road (Strawberry)	Incredibly steep terrain; no room for 32 units; no water hook-up, access or other infrastructure, which could lead to neighborhood evacuation problems in a fire-prone area; already bad traffic on tiburon boulevard; abundant wildlife with nowhere to go if you destroy their habitat	Countywide		X		X				X		X		X	X			
R7 - Eagle Rock Road (Strawberry)	Prefer more housing in locations like this closer to the city - where jobs are - to shorten commutes and decrease traffic sprawl. Also like that this site is closer to the highway/commuting corridor.	Countywide																X
R7 - Eagle Rock Road (Strawberry)	This is pristine natural land with an abundance of local species of wildlife.	Countywide										X						
R7 - Eagle Rock Road (Strawberry)	This is the next street over from me as I live in Kruger Pines 47 N Knoll Road- we would need a traffic light put at N Knoll Rd & Tiburon Blvd-- redo that intersection and make N Knoll Road a county maintained road too as it is just pot holes now and getting worse. The traffic has to be very aggressive leaving the neighborhood to make a right turn to get on the 101. There is no way to make left turns at all onto Tiburon Blvd. so that whole intersection needs to be redone. It could be family and workforce up on Eagle Rock and put the seniors on N. Knoll Road.	Countywide				X											X	X
R7 - Eagle Rock Road (Strawberry)	This site is not appropriate for high density housing. The Eagle Rock neighborhood already has traffic problems, and adding units will exacerbate those issues. This particular site is on extreme slope - likely a 30% grade. Adding high density housing to this site will also destroy the family neighborhood surrounded by open space. Please consider repurposing more urban locations.	Countywide				X				X		X						
R7 - Eagle Rock Road (Strawberry)	Traffic is horrible in this area. Also there is a lot of street parking on Eagle Rock. Adding additional housing will only cause worse conditions. The open space on ring mountain is home to many wildlife (owls, coyotes, turkey, deer and bobcats not to mention smaller animals as well.)	Countywide				X	X			X		X						
R8 - 8901 Redwood Boulevard (North Novato)	Fire risk and lack of water for more residents. This appears to be over a state park. No development on a state park.	Countywide										X		X	X			
R8 - 8901 Redwood Boulevard (North Novato)	Prefer more building down south near the city/jobs, for shorter commutes, less traffic, and less sprawl.	Countywide				X						X						
R8 - 8901 Redwood Boulevard (North Novato)	Too close to important Miwok site.	Enviro Hazard				X							X					
R9 - Sir Francis Drake Boulevard (San Quentin)	Traffic to get to the bridge is already terrible. Reroute the road going to the bridge and this would be a good location.	Countywide				X												
Total RHNA Allocation	This is far too much that is being shoved down into the funnel where there is little land available (Strawberry, Marin City). The County needs to be aggressive and pushing back on ABAG and the state. San Francisco has over 40,000 vacant properties so let Weiner deal with getting San Francisco vacancies down and stop shoving the issue onto Marin.	Countywide																

MARIN COUNTY HOUSING ELEMENT: CANDIDATE HOUSING SITES AND SELECTION PROCESS
COMMENTS RECEIVED VIA EMAIL

Location	Comment	Source	PCL	INF	SER	TRF	PRK	PTR	ACT	NMR	SEA	NAT	CUL	FIR	WAT	HLT	EQT	GDL
1009 Idleberry (Lucas Valley/Marinwood)	I am concerned since I never received this notice. I learned about it from one neighbor on Thursday 2/24. How were property owners in this area notified? How many homeowners have you contacted. I don't know any who has been notified except the neighbor that told me. Please give me the courtesy of a response. This is a lovely area but with many limitations & constraints for development – infrastructure limited ingress & egress on Lucas Valley Road schools etc. Additionally this is a WUI wildfire area. A recent minor fire caused limited area evacuations. I was evacuated and this small event caused alarming road congestion. In case of a more extensive fire it would be a disaster.	Email		X	X	X								X				
1501 Lucas Valley Road (Lucas Valley/Marinwood)	I am concerned since I never received this notice. I learned about it from one neighbor on Thursday 2/24. How were property owners in this area notified? How many homeowners have you contacted. I don't know any who has been notified except the neighbor that told me. Please give me the courtesy of a response. This is a lovely area but with many limitations & constraints for development – infrastructure limited ingress & egress on Lucas Valley Road schools etc. Additionally this is a WUI wildfire area. A recent minor fire caused limited area evacuations. I was evacuated and this small event caused alarming road congestion. In case of a more extensive fire it would be a disaster.	Email		X	X	X								X				
223 Shoreline HIghway (Tam Junction)	(Comment edited for length) Sustainable TamAlmonte has the following comments and recommendations regarding the merits of the above referenced Tam Valley, Almonte, and Manzanita Candidate Housing Sites listed in the 2023-2031 Housing Element DRAFT Candidate Housing Sites List. Due to the unique characteristics of the area, encouraging residential development, especially high-density development, at the above referenced Sites would increase the risk of undue harm to the environment and undue hardship, illness, injury and/or death to the current and future residents. The Tam Valley, Almonte, and Manzanita commercial lowlands, in which the above referenced sites are located, experience the most number of environmental constraints and hazards of any area in Unincorporated Marin. Both the Marin Countywide Plan's EIR and the 2012 Housing Element's SEIR demonstrate that development at these sites would exacerbate the existing dangerous conditions and add new significant adverse environmental impacts (which) magnifies the probability that a tragedy would ensue and the multiple mitigations that a developer would need to fulfill would cause development costs to soar. These factors make the sites unsuitable for affordable housing. The only acceptable course of action is to eliminate the sites from the inventory. Below is a list of the unique natural features, hazards, and limited resources in the Tam Valley, Almonte, and Manzanita lowlands that constrain development and population growth and substantiate our argument. For a quick overview of these constraints, please view the attached table. I. Dangerous Traffic with Unacceptable Level Of Service – LOS "F" Of Local Roadways:. II. Flooding, 100 Year Floodplain, Impending Sea Level Rise III. Filled Marsh Areas With High Seismic Activity, Liquefaction, Subsidence and Mud Displacement. IV. Air Quality & Noise: Increased Risk of Residents Developing Serious Illness Due to Living Near Major Roadways. V. Hazardous Materials: For additional information regarding potential health impacts to workers and future residents who may be exposed to hazardous soil conditions, related to past uses, in Tam Junction and Manzanita, please follow the below link to read the comment letter by Technical Expert Matt Hagemann. VI. Endangered Special Status Species. VII. Insufficient Services & Public Transit. VIII. Historic Wetlands and Baylands Corridor. IX. Historic Marshland That Could Be Restored. 160 Shoreline Hwy and 260 Redwood Hwy Frontage Rd. are historic marshland. X. High Density Development Is Not Consistent With the Traditional Character Of The Local Semi-Rural Communities. Conclusion: The County now has sufficient information to understand that the proposed Tam Valley, Almonte, and Manzanita Sites are inappropriate for inclusion in the 2023-2031 Housing Element Candidate Housing Sites Inventory. Not only would construction of housing on these sites exacerbate the already existing problems but doing so when the County admits in the Marin Countywide Plan EIR and 2012 Housing Element's FSEIR that significant adverse unavoidable impacts would result from such construction defies logic. Moreover, there can be no benefit that would override the impacts of environmental harm and severe illness, injury or loss of life from building on the Tam Valley, Almonte, and Manzanita Candidate Housing Sites, which are laden with environmental constraints and dangerous hazards. The best course of action would be for the County to revise the list to reflect the current problems with traffic, seismic activity, hazardous soil conditions, air and noise pollution, water supply, flooding, and impending sea level rise and to find that no new residential development in the Tam Junction & Manzanita areas is appropriate. Such action would be consistent with the Board of Supervisors' sensible decisions.	Email (See Email Comments Received.PDF, pp. 123-151)	X	X	X	X		X		X	X	X	X	X	X	X		
223 Shoreline HIghway (Tam Junction)	(Comment edited for length) Sustainable TamAlmonte has the following comments and recommendations regarding the merits of the above referenced Tam Valley, Almonte, and Manzanita Candidate Housing Sites listed in the 2023-2031 Housing Element DRAFT Candidate Housing Sites List. Due to the unique characteristics of the area, encouraging residential development, especially high-density development, at the above referenced Sites would increase the risk of undue harm to the environment and undue hardship, illness, injury and/or death to the current and future residents. The Tam Valley, Almonte, and Manzanita commercial lowlands, in which the above referenced sites are located, experience the most number of environmental constraints and hazards of any area in Unincorporated Marin. Both the Marin Countywide Plan's EIR and the 2012 Housing Element's SEIR demonstrate that development at these sites would exacerbate the existing dangerous conditions and add new significant adverse environmental impacts (which) magnifies the probability that a tragedy would ensue and the multiple mitigations that a developer would need to fulfill would cause development costs to soar. These factors make the sites unsuitable for affordable housing. The only acceptable course of action is to eliminate the sites from the inventory. Below is a list of the unique natural features, hazards, and limited resources in the Tam Valley, Almonte, and Manzanita lowlands that constrain development and population growth and substantiate our argument. For a quick overview of these constraints, please view the attached table. I. Dangerous Traffic with Unacceptable Level Of Service – LOS "F" Of Local Roadways:. II. Flooding, 100 Year Floodplain, Impending Sea Level Rise III. Filled Marsh Areas With High Seismic Activity, Liquefaction, Subsidence and Mud Displacement. IV. Air Quality & Noise: Increased Risk of Residents Developing Serious Illness Due to Living Near Major Roadways. V. Hazardous Materials: For additional information regarding potential health impacts to workers and future residents who may be exposed to hazardous soil conditions, related to past uses, in Tam Junction and Manzanita, please follow the below link to read the comment letter by Technical Expert Matt Hagemann. VI. Endangered Special Status Species. VII. Insufficient Services & Public Transit. VIII. Historic Wetlands and Baylands Corridor. IX. Historic Marshland That Could Be Restored. 160 Shoreline Hwy and 260 Redwood Hwy Frontage Rd. are historic marshland. X. High Density Development Is Not Consistent With the Traditional Character Of The Local Semi-Rural Communities. Conclusion: The County now has sufficient information to understand that the proposed Tam Valley, Almonte, and Manzanita Sites are inappropriate for inclusion in the 2023-2031 Housing Element Candidate Housing Sites Inventory. Not only would construction of housing on these sites exacerbate the already existing problems but doing so when the County admits in the Marin Countywide Plan EIR and 2012 Housing Element's FSEIR that significant adverse unavoidable impacts would result from such construction defies logic. Moreover, there can be no benefit that would override the impacts of environmental harm and severe illness, injury or loss of life from building on the Tam Valley, Almonte, and Manzanita Candidate Housing Sites, which are laden with environmental constraints and dangerous hazards. The best course of action would be for the County to revise the list to reflect the current problems with traffic, seismic activity, hazardous soil conditions, air and noise pollution, water supply, flooding, and impending sea level rise and to find that no new residential development in the Tam Junction & Manzanita areas is appropriate. Such action would be consistent with the Board of Supervisors' sensible decisions.	Email (See Email Comments Received.PDF, pp. 123-151)	X	X	X	X		X		X	X	X	X	X	X	X		
254 Lucas Valley Road near Terra Linda Ridge	I am writing to urge you NOT to approve the Marinwood/Lucas Valley sites under consideration to satisfy the Association of Bay Area Governments Regional Housing Needs Allocation Plan. Developments at these six sites (St. Vincent's School, Marinwood Market, 530 Blackstone Drive, 7 Mt. Lassen, 2 Jeannette Prandi Way, and Lucas Valley Road near Terra Linda Ridge) would result in more than 2300 housing units. While I know that some of the proposed housing is intended for teachers and other critical workers and for low income housing, both of which are important and necessary, it seems like too much development for the infrastructure of this small area. Additionally, all of these proposed development sites are within the Miller Creek School District boundaries and the unfunded impact of these developments on the District would be disastrous. Since the District is currently funded using a Basic Aid Model, it gets no per pupil funding. This means that all the additional students these developments generate will not result in additional funding for the District.	Email		X	X					X							X	
254 Lucas Valley Road near Terra Linda Ridge	I found the online tools for commenting cumbersome and inscrutable, and much too time consuming to use. So, the following are my comments about specific housing allotment recommendations in Marinwood Lucas Valley. Lucas Valley Rd/near terra Linda Ridge: 26 Where is this? Where the stable is now located?	Email																

Location	Comment	Source	PCL	INF	SER	TRF	PRK	PTR	ACT	NMR	SEA	NAT	CUL	FIR	WAT	HLT	EQT	GDL
254 Lucas Valley Road Near Terra Linda Ridge	I'm taking this opportunity as a resident of Upper Lucas Valley in Marin to voice my views/concerns about the housing sites under consideration in my area: In general: I don't know what constitutes median vs low income, but in general I support add'l housing strategically placed and sensitively designed (to minimize negative impact on the environment and established communities) for essential workers such as school teachers, sheriff, police & fire dept and hospital staffers, many of whom currently commute long distances to work in the areas they serve. I'd like to see new homeowning opportunities (at below market rates) made available to these workers, as building more high-priced rental units serves no one but property owners.Sites under consideration in the Marinwood/Lucas Valley areas: St Vincent's School – 1800; Marinwood Market – 136. These are both logical, less problematic sites for development, as they are walkable to the GG bus stop at/near Miller Creek & Marinwood Aves, with quick, easy access to the 101 fwy. I really hope to see sensitive urban planning on the St. Vincents site, so the beautiful open space currently grazed by cows does not become yet another soulless jungle of buildings standing shoulder to shoulder facing the freeway. Speaking as someone who's actually rooting for the Smart Train to not only survive, but thrive: part of any development of these sites should include a bike path/paths to connect either or both to the Civic Center Smart station. And/or a shuttle bus (it's too long to walk for commuters).530 Blackstone Drive (site of religious house) – 32. I've no knowledge/opinion re: this site. 7 Mt Lassen (site of office park) – 58. 2 Jeannette Prandi Way (site of Juvenile Hall) – 254. My husband & I currently rent an office at 7 Mt. Lassen, so it's news to us that this site's under consideration. It's a beautiful, unique office setting that serves both the Upper and Lower Lucas Valley communities as a place of business to walk to! I'd hate to see that disappear!!! However, I wouldn't be adverse to seeing a portion of the current 7 Mt. Lassen structures converted to work/live spaces, if sensitively planned. Maybe 30%. My comments re: St. Vincents also apply to Jeannette Prandi Way. As long as new development is against the hills with access via Idylberry Rd, away from Lucas Valley Rd, and sensitively planned, I'm not totally adverse to new development. However the # of units proposed is too high!** Lucas Valley Rd/near terra Linda Ridge: 26. I don't know exactly where this is, but in principle I'm against it. **The problem with all new development close to Lucas Valley Rd is not merely degradation of the scenic route of LVR — but more importantly, adding traffic congestion to a wildfire interface area with a single ingress/egress. I'm an LVHA block captain, and was present and part of the fire evacuation on Sept 1st 2021... a learning experience. It's for this reason that I signed the petition against development in Lucas Valley. I believe that the current Northgate Mall could and should be a site for mixed-use development including low-to median income housing, yet is not on this list of proposed sites. It ticks all the boxes for access to transportation, schools, shopping, etc.	Email	X		X	X		X	X			X		X			X	X
254 Lucas Valley Road near Terra Linda Ridge	This letter is in regards to the proposed site and distribution of housing in the Lucas Valley/Marinwood area. While I feel this area can support some expansion, the amount proposed by the county is overwhelming. Per the board of supervisors principles, please note my feedback below. 1: Ensure Countywide Distribution: The majority of housing in unincorporated Marin County is being distributed to Marinwood/LUCAS VALLEY. This does not appear to be an equitable distribution and will potentially double the population of this area, affecting all services- sheriff, fire, schools, traffic, etc. Marinwood/LUCAS VALLEY area is being considered for a majority of this housing in unincorporated Marin: St Vincents: 1800 Marinwood Market: 136 Blackstone (site of religious house): 32 Mt Lassen/deli: 58 Jeanette Prandi/Juvi: 254 Lucas Valley Rd/near terra Linda Ridge: 26 Total: 2306. (This could be up to 60% of the total housing for unincorporated Marin) Households in Marinwood/LUCAS VALLEY currently 2412. (This could potentially double our size)	Email		X	X	X				X				X				
254 Lucas Valley Road near Terra Linda Ridge	This letter is in regards to the proposed site and distribution of housing in the Lucas Valley/Marinwood area. While I feel this area can support some expansion, the amount proposed by the county is overwhelming. Per the board of supervisors principles, please note my feedback below. 1: Ensure Countywide Distribution: The majority of housing in unincorporated Marin County is being distributed to Marinwood/LUCAS VALLEY. This does not appear to be an equitable distribution and will potentially double the population of this area, affecting all services- sheriff, fire, schools, traffic, etc. Marinwood/LUCAS VALLEY area is being considered for a majority of this housing in unincorporated Marin: St Vincents: 1800 Marinwood Market: 136 Blackstone (site of religious house): 32 Mt Lassen/deli: 58 Jeanette Prandi/Juvi: 254 Lucas Valley Rd/near terra Linda Ridge: 26 Total: 2306. (This could be up to 60% of the total housing for unincorporated Marin) Households in Marinwood/LUCAS VALLEY currently 2412. (This could potentially double our size)	Email		X	X	X				X				X				
254 Lucas Valley Road near Terra Linda Ridge	We have seen the preliminary list of potential housing sites for Marin County, including in unincorporated areas such as Marinwood/Lucas Valley, as developed by the ABAG (Regional Housing Needs Allocation Plan), and approved by the California Department of Housing and Community Development. The plan includes 2,412 units within the Lucas Valley / Marinwood area (accounting for 68% of the 3,569 units within unincorporated Marin County). Sites under consideration in the Marinwood / Lucas Valley areas: St Vincent's School - 1,800; Marinwood Market – 136; 530 Blackstone Drive (site of religious house) - 32 7; Mt Lassen (site of office park) – 58; 2 Jeannette Prandi Way (site of Juvenile Hall); 254 LucasValley Rd/near terra Linda Ridge: 26. We are not opposed to some moderate increase of housing units in the area. However, we have some serious concerns regarding these potential sites: (1) The Lucas Valley / Marinwood area currently has less than roughly 1,750 homes, spread across a roughly 3.5 mile valley corridor, almost all of which are single family dwellings, and the overwhelming majority of which are one or two story homes. There are no large multi-unit apartment buildings in this area. The overall magnitude of the increase in units in this area (2,412 units) is disproportionately large compared to the current housing density of the area. The proposed increase would more than double the overall number of housing units in the area. (2) The area to the south and west of St. Vincent's School (east of HWY 101) has been discussed as a potential development site for some time. Although multi-unit housing could easily be developed there, adding 1,800 units would completely overwhelm the property and this very large number of additional units represents an enormous growth for the area, on the same order of units as currently exist in all of Lucas Valley / Marinwood. To fit this large number of units, the development would likely include large three (or more) story structures, which do not currently exist anywhere in this area. (3) The site at 530 Blackstone Drive (current site of religious house) could easily fit a multi-unit development, however 32 units on this site is far too large for the size of the property, which is near the end of a small half-mile residential street, that currently has less than 50 total housing units. (4) The site at 7 Mt. Lassen Drive (currently two relatively small two-story office buildings) is far too small to fit 58 housing units without the new structure extending to three or more stories. (5) The site at 2 Jeannette Prandi Way (south of the Juvenile Hall) is currently an open space area with a loop path that is regularly used by nearby residents (including residents of the nearby senior housing development) as a recreational walking, bike riding, etc. area (and dog walking area). This open space area has been in existence for well over thirty years and is a very popular area regularly used by many residents of the adjoining neighborhoods. A potential development consisting of 254 units on this site would completely eliminate a treasured and much-used open space area and would likely require a multi-story (three or more stories) structure. Very few of the homes in this area of Lucas Valley / Marinwood are more than one story (almost all are one-story Eichler homes). Such a large development is completely out of character with the current land use in this area and should absolutely not be allowed to be developed on this site. (6) These potential new housing units would represent an extremely large additional burden to traffic density in the area. (7) These potential new housing units would overwhelm the current capacity at our three elementary schools and one middle school. (8) These potential new housing units would create a very large additional demand for water resources in the Lucas Valley / Marinwood area which are currently very limited. The simple number (2,412) of potential additional housing units in the Lucas Valley / Marinwood area is much too large and would represent an approximate doubling of the current housing density in the area. Each of the proposed developments presents issues regarding the size of new structures (including constructing multi-story structures in areas where there are currently none), and would present issues concerning current resource capacities (including traffic, schools, and water). Thank you for your consideration of these issues when making decisions regarding potential new housing developments in the Lucas Valley / Marinwood area.	Email				X	X			X		X						
2800 West Novato Blvd., Novato	If you need MORE " VERY LOW AND LOW INCOME" and " MODERATE INCOME " sites closer to Novato, our property at 2800 West Novato Blvd has plenty of room and space. Thank you. We appreciate all your hard work here	Email																X

Location	Comment	Source	PCL	INF	SER	TRF	PRK	PTR	ACT	NMR	SEA	NAT	CUL	FIR	WAT	HLT	EQT	GDL
4260 Sir Francis Drake Boulevard, Woodacre	Hello Supervisor Rodoni, This message is regarding the Housing Element site proposals. Like yourself, I was born and raised in West Marin County. My family has been ranching in Marin for 5 generations, and our love for the land and community runs deep. We understand that there is a need for more affordable housing in Marin, however; We oppose any development at 4260 Sir Francis Drake Boulevard (TUHS). Development on said property would be a detriment to the Valley consider how the lack of public transportation, water access, septic/sewage and the increase of traffic would impact the surrounding area - community, environment and wildlife as a whole. There are many other places in Marin where housing can be developed and integrated into the surrounding area to the benefit of the community. We are asking you to conserve the land at 4260 Sir Francis Drake Boulevard. Thank you for your time.	Email				X		X				X		X	X			
530 Blackstone Drive (Marinwood / Lucas Valley)	(Comment edited for length) The Lucas Valley Homeowner's Association represents 538 homes in the special R-1:B-LV zoning track in Upper Lucas Valley. We, the Board of Directors of the LVHA, would like to give our support for the efforts to increase housing in Marin County, and offer the following input. To begin with, our State Governor's Housing Plan incentivizes housing in urban centers near transportation and services, to reduce reliance on vehicles and their carbon footprint. If the County chooses a path contrary to the State Plan, and not utilize State funding incentives for urban development, then we ask for a reevaluation of the housing sites identified for our Lucas Valley/Marinwood area. As outlined below, areas 1 - 3 are both contrary to the RHNA requirements and pose a danger for emergency evacuations. There are several sites identified as potential home building sites in our area. 1. Lucas Valley Road / Mt Muir Court 2. Juvenile Detention Center/Jeanette Prandi Way 3. 7 Mt Lassen 4. 530 Blackstone Dr 5. Marinwood Market area. We agree that the Marinwood Market area is a suitable site. It is close to freeway access and has sufficient infrastructure in place, including amenities like food and gas, and can easily absorb new development. Ironically, the relative quantity proposed/identified at this site is comparably less than the quantity for site #2 above, which is a much less suitable site as shown in following comments. There are several factors that make areas 1 - 3 only marginally suitable for new building sites, and therefore should, at best, be only allowed limited building. Factors include: High Wildfire Risk - Single Limited Evacuation Route. Water Shortages. Lack of Infill Infrastructure. Building Atop Unmarked Graves. Zoning Restrictions: The special zoning district for Upper Lucas Valley (R-1:B-LV) limits most buildings to a single story. The district was created in order to adhere to the architectural vision and design aesthetic of Joseph Eichler, a renowned architect highly influential in modern architecture. The existing low income senior living homes on Jeanette Prandi Way are likewise single story. If a housing development is allowed near the Juvenile Detention Center site, 7 Mt. Lassen, or Muir Court, they would have to be single story to maintain the character of the surrounding architectural landscape. This would limit the number of units allowed at these sites. Juvenile Detention Center: The concept of constructing multi-family housing at or adjacent to the Detention Center poses challenging logistical and feasibility issues. The County's attempts to reduce juvenile incarceration has been largely successful; however, not to the point where closure of the facility is possible. Marin County's criminal justice program continues to call for incarceration of violent youth offenders, and does not currently have an alternative detention facility. Consequently, any new housing at the Jeanette Prandi location would be adjacent to the Detention Center. It may be quite difficult to convince a developer to invest in a location where part of the "selling pitch" to residents is proximity to a detention center, particularly given that the facilities at Juvenile Hall are in major disrepair. Long History of Racial Parity. Among the factors the County is reviewing in selecting sites is historical discrimination. Our community has no such history and should not, therefore, be a priority for desegregation. Unlike many restrictive covenants in other neighborhoods in Marin County and across California, our CC&Rs have never contained language restricting homeownership based on race, creed, color or religion. Our community celebrates diversity, and we want to make clear we have no history of resisting it. Indeed, it has been reported by original LVHA members that our community attracted a large number of buyers of Asian descent as it was one of the few areas that they were not discriminated from buying into. Locating Housing Near Services and Transportation: The Board of Supervisors affirmed several principles for deciding potential Housing sites and distribution in 12/2021. The potential Housing sites listed for the Lucas Valley communities seem to ignore the mandate for locating housing near services and transportation. The Lucas Valley Community believes the County should be practical and realistic in identifying sites to satisfy the RHNA requirements that do not create a danger to existing communities, will actually serve the goals of the housing mandate, and that show homage to our beautiful and historically significant community. We respectfully request the County to rethink its "rural" VS "urban" housing development plans in light of the State's most recent Urban Housing strategy and funding incentives.	Email (See Email Comments Received.PDF, pp. 173-178)			X		X				X		X	X	X	X		X	
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6900 Sir Francis Drive Boulevard (San Geronino)	I could not access the Balancing Site work area so I am submitting these comments here. SGV is am amazing place to be due to low development. I have had the benefit of living here 25 years. What is being proposed in both of the areas of the School property and at the Gold Course are for higher end homes. Higher end homes are not a help for our community. We need homes for families with kids, We need Senior housing. We don't need another 127 above moderate income homes. Have some vision. Create a place with a grocery store, deli, and place for people to meet. Create Senior housing. Have ability to share vehicles. This area could become a hub for our community to use and support. It is also a sensitive environmental area. It used to be where water would spread out when it rained and slowly sink into the ground providing water all year round for the fish. More concrete and asphalt = more runoff. This vision of 98 separate high end homes here is not fitting to the rural area of our valley. It is just going to bring in more people who want a rural lifestyle from other areas and NOT give our locals homes. Every day, people, and families are looking for homes. Renters are being pushed out. It is unaffordable to live here. Solve the problem we have now, housing for our locals. Not bring more people here. Also, the place being considered at 6900 Sir Francis Drake is a privately owned place. Owned by a family that owns quite a bit of property in the Valley as it is. I certainly hope public monies are not going to rehab this property.	Email								X		X						X	

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7 Mt. Lassen (Marinwood / Lucas Valley)	I'm taking this opportunity as a resident of Upper Lucas Valley in Marin to voice my views/concerns about the housing sites under consideration in my area: In general: I don't know what constitutes median vs low income, but in general I support add'l housing strategically placed and sensitively designed (to minimize negative impact on the environment and established communities) for essential workers such as school teachers, sheriff, police & fire dept and hospital staffers, many of whom currently commute long distances to work in the areas they serve. I'd like to see new homeowning opportunities (at below market rates) made available to these workers, as building more high-priced rental units serves no one but property owners.Sites under consideration in the Marinwood/Lucas Valley areas: St Vincent's School – 1800; Marinwood Market – 136. These are both logical, less problematic sites for development, as they are walkable to the GG bus stop at/near Miller Creek & Marinwood Aves, with quick, easy access to the 101 fwy. I really hope to see sensitive urban planning on the St. Vincents site, so the beautiful open space currently grazed by cows does not become yet another soulless jungle of buildings standing shoulder to shoulder facing the freeway. Speaking as someone who's actually rooting for the Smart Train to not only survive, but thrive: part of any development of these sites should include a bike path/paths to connect either or both to the Civic Center Smart station. And/or a shuttle bus (it's too long to walk for commuters).530 Blackstone Drive (site of religious house) – 32. I've no knowledge/opinion re: this site. 7 Mt Lassen (site of office park) – 58. 2 Jeannette Prandi Way (site of Juvenile Hall) – 254. My husband & I currently rent an office at 7 Mt. Lassen, so it's news to us that this site's under consideration. It's a beautiful, unique office setting that serves both the Upper and Lower Lucas Valley communities as a place of business to walk to! I'd hate to see that disappear!!! However, I wouldn't be adverse to seeing a portion of the current 7 Mt. Lassen structures converted to work/live spaces, if sensitively planned. Maybe 30%. My comments re: St. Vincents also apply to Jeannette Prandi Way. As long as new development is against the hills with access via Idylberry Rd, away from Lucas Valley Rd, and sensitively planned, I'm not totally adverse to new development. However the # of units proposed is too high!** Lucas Valley Rd/near terra Linda Ridge: 26. I don't know exactly where this is, but in principle I'm against it. **The problem with all new development close to Lucas Valley Rd is not merely degradation of the scenic route of LVR — but more importantly, adding traffic congestion to a wildfire interface area with a single ingress/egress. I'm an LVHA block captain, and was present and part of the fire evacuation on Sept 1st 2021... a learning experience. It's for this reason that I signed the petition against development in Lucas Valley. I believe that the current Northgate Mall could and should be a site for mixed-use development including low-to median income housing, yet is not on this list of proposed sites. It ticks all the boxes for access to transportation, schools, shopping, etc.	Email	X		X	X		X	X			X		X			X	X
7 Mt. Lassen (Marinwood / Lucas Valley)	Thank you for taking time to read over my thoughts on the new housing developments proposed for Jeanette Prandi Way, Mount Muir Court, Marinwood Plaza and 7 Lassen. As a Marin County native of 58 years and a Lucas valley resident of 26 years, I am surprised that these projects are so close to approval without adequate community outreach and input. There are many items of concern that I don't feel have been adequately answered for me to support these developments. At this time I am strongly opposed to these developments. I am respectfully requesting more time for our community to better understand these proposals and how we can collaboratively help the County solve its low income housing challenges.	Email																

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7 Mt. Lassen (Marinwood / Lucas Valley)	We have seen the preliminary list of potential housing sites for Marin County, including in unincorporated areas such as Marinwood/Lucas Valley, as developed by the ABAG (Regional Housing Needs Allocation Plan), and approved by the California Department of Housing and Community Development. The plan includes 2,412 units within the Lucas Valley / Marinwood area (accounting for 68% of the 3,569 units within unincorporated Marin County). Sites under consideration in the Marinwood / Lucas Valley areas: St Vincent's School - 1,800; Marinwood Market – 136; 530 Blackstone Drive (site of religious house) - 32 7; Mt Lassen (site of office park) – 58; 2 Jeannette Prandi Way (site of Juvenile Hall); 254 LucasValley Rd/near terra Linda Ridge: 26. We are not opposed to some moderate increase of housing units in the area. However, we have some serious concerns regarding these potential sites: (1) The Lucas Valley / Marinwood area currently has less than roughly 1,750 homes, spread across a roughly 3.5 mile valley corridor, almost all of which are single family dwellings, and the overwhelming majority of which are one or two story homes. There are no large multi-unit apartment buildings in this area. The overall magnitude of the increase in units in this area (2,412 units) is disproportionately large compared to the current housing density of the area. The proposed increase would more than double the overall number of housing units in the area. (2) The area to the south and west of St. Vincent's School (east of HWY 101) has been discussed as a potential development site for some time. Although multi-unit housing could easily be developed there, adding 1,800 units would completely overwhelm the property and this very large number of additional units represents an enormous growth for the area, on the same order of units as currently exist in all of Lucas Valley / Marinwood. To fit this large number of units, the development would likely include large three (or more) story structures, which do not currently exist anywhere in this area. (3) The site at 530 Blackstone Drive (current site of religious house) could easily fit a multi-unit development, however 32 units on this site is far too large for the size of the property, which is near the end of a small half-mile residential street, that currently has less than 50 total housing units. (4) The site at 7 Mt. Lassen Drive (currently two relatively small two-story office buildings) is far too small to fit 58 housing units without the new structure extending to three or more stories. (5) The site at 2 Jeannette Prandi Way (south of the Juvenile Hall) is currently an open space area with a loop path that is regularly used by nearby residents (including residents of the nearby senior housing development) as a recreational walking, bike riding, etc. area (and dog walking area). This open space area has been in existence for well over thirty years and is a very popular area regularly used by many residents of the adjoining neighborhoods. A potential development consisting of 254 units on this site would completely eliminate a treasured and much-used open space area and would likely require a multi-story (three or more stories) structure. Very few of the homes in this area of Lucas Valley / Marinwood are more than one story (almost all are one-story Eichler homes). Such a large development is completely out of character with the current land use in this area and should absolutely not be allowed to be developed on this site. (6) These potential new housing units would represent an extremely large additional burden to traffic density in the area. (7) These potential new housing units would overwhelm the current capacity at our three elementary schools and one middle school. (8) These potential new housing units would create a very large additional demand for water resources in the Lucas Valley / Marinwood area which are currently very limited. The simple number (2,412) of potential additional housing units in the Lucas Valley / Marinwood area is much too large and would represent an approximate doubling of the current housing density in the area. Each of the proposed developments presents issues regarding the size of new structures (including constructing multi-story structures in areas where there are currently none), and would present issues concerning current resource capacities (including traffic, schools, and water). Thank you for your consideration of these issues when making decisions regarding potential new housing developments in the Lucas Valley / Marinwood area.	Email				X	X			X		X				X			
7 Mt. Lassen (Marinwood / Lucas Valley)	With respect to the Lucas Valley sites being considered as potential housing sites, I submit the following comments: Sites located at 7 Mt. Lassen Drive and at Lucas Valley Road/Mt Muir near Terra Linda Ridge fail to comply with stated criteria for site selection. These sites present environmental hazards, including high fire danger as exhibited last August when a wildfire approached housing and traffic became a hazard. These areas also fail to provide access to transportation, jobs, services, and amenities. Lucas Valley is an inappropriate choice. In addition, all of the Lucas Valley sites are in the wildland urban interface (WUI) zones that contradict Governor Newson's priorities to shift housing away from rural wildfire-prone areas and closer to urban centers.	Email	X			X		X		X		X		X				
70 Oxford Drive, Santa Venetia	RE: APN 180-261-10 Address: 70 Oxford Drive. The undersigned is owner of this large (27.8 acres, or approx. 1,211,000 sf) parcel. As currently zoned A2B2 (minimum lot size of 10,000 sf), it is extraordinarily and technically suitable for numerous residences. To help the County and the State to meet their Housing target, we agree with and welcome the proposed suggestion of multiple possible residences on this acreage, but suggest the number be reduced to a maximum of five (5). This necessarily lower number would result in (A) lot sizes more consistent with the surrounding neighborhood, as specifically recommended in the Santa Venetia Community Plan; (B) smaller homes consistent with the affordability targets; (C) lot configurations more accessible (requiring less ground disturbance) and least likely to conflict with numerous environmental and cultural constraints extant on the site; and (D) a density nearly ten times less than the initial proposal, thus significantly less negative impact on the current traffic congestion on NSPR which is the sole access/egress to Santa Venetia.	Email	X			X				X		X						

Location	Comment	Source	PCL	INF	SER	TRF	PRK	PTR	ACT	NMR	SEA	NAT	CUL	FIR	WAT	HLT	EQT	GDL
B - 160 Shoreline Highway (Almonte)	(Comment edited for length) Sustainable TamAlmonte has the following comments and recommendations regarding the merits of the above referenced Tam Valley, Almonte, and Manzanita Candidate Housing Sites listed in the 2023-2031 Housing Element DRAFT Candidate Housing Sites List. Due to the unique characteristics of the area, encouraging residential development, especially high-density development, at the above referenced Sites would increase the risk of undue harm to the environment and undue hardship, illness, injury and/or death to the current and future residents. The Tam Valley, Almonte, and Manzanita commercial lowlands, in which the above referenced sites are located, experience the most number of environmental constraints and hazards of any area in Unincorporated Marin. Both the Marin Countywide Plan's EIR and the 2012 Housing Element's SEIR demonstrate that development at these sites would exacerbate the existing dangerous conditions and add new significant adverse environmental impacts (which) magnifies the probability that a tragedy would ensue and the multiple mitigations that a developer would need to fulfill would cause development costs to soar. These factors make the sites unsuitable for affordable housing. The only acceptable course of action is to eliminate the sites from the inventory. Below is a list of the unique natural features, hazards, and limited resources in the Tam Valley, Almonte, and Manzanita lowlands that constrain development and population growth and substantiate our argument. For a quick overview of these constraints, please view the attached table. I. Dangerous Traffic with Unacceptable Level Of Service – LOS "F" Of Local Roadways:. II. Flooding, 100 Year Floodplain, Impending Sea Level Rise III. Filled Marsh Areas With High Seismic Activity, Liquefaction, Subsidence and Mud Displacement. IV. Air Quality & Noise: Increased Risk of Residents Developing Serious Illness Due to Living Near Major Roadways. V. Hazardous Materials: For additional information regarding potential health impacts to workers and future residents who may be exposed to hazardous soil conditions, related to past uses, in Tam Junction and Manzanita, please follow the below link to read the comment letter by Technical Expert Matt Hagemann. VI. Endangered Special Status Species. VII. Insufficient Services & Public Transit. VIII. Historic Wetlands and Baylands Corridor. IX. Historic Marshland That Could Be Restored. 160 Shoreline Hwy and 260 Redwood Hwy Frontage Rd. are historic marshland. X. High Density Development Is Not Consistent With the Traditional Character Of The Local Semi-Rural Communities. Conclusion: The County now has sufficient information to understand that the proposed Tam Valley, Almonte, and Manzanita Sites are inappropriate for inclusion in the 2023-2031 Housing Element Candidate Housing Sites Inventory. Not only would construction of housing on these sites exacerbate the already existing problems but doing so when the County admits in the Marin Countywide Plan EIR and 2012 Housing Element's FSEIR that significant adverse unavoidable impacts would result from such construction defies logic. Moreover, there can be no benefit that would override the impacts of environmental harm and severe illness, injury or loss of life from building on the Tam Valley, Almonte, and Manzanita Candidate Housing Sites, which are laden with environmental constraints and dangerous hazards. The best course of action would be for the County to revise the list to reflect the current problems with traffic, seismic activity, hazardous soil conditions, air and noise pollution, water supply, flooding, and impending sea level rise and to find that no new residential development in the Tam Junction & Manzanita areas is appropriate. Such action would be consistent with the Board of Supervisors' sensible decisions.	Email (See Email Comments Received.PDF, pp. 123-151)	X			X					X	X		X			X	
B - 160 Shoreline Highway (Almonte)	(Comment edited for length) Sustainable TamAlmonte has the following comments and recommendations regarding the merits of the above referenced Tam Valley, Almonte, and Manzanita Candidate Housing Sites listed in the 2023-2031 Housing Element DRAFT Candidate Housing Sites List. Due to the unique characteristics of the area, encouraging residential development, especially high-density development, at the above referenced Sites would increase the risk of undue harm to the environment and undue hardship, illness, injury and/or death to the current and future residents. The Tam Valley, Almonte, and Manzanita commercial lowlands, in which the above referenced sites are located, experience the most number of environmental constraints and hazards of any area in Unincorporated Marin. Both the Marin Countywide Plan's EIR and the 2012 Housing Element's SEIR demonstrate that development at these sites would exacerbate the existing dangerous conditions and add new significant adverse environmental impacts (which) magnifies the probability that a tragedy would ensue and the multiple mitigations that a developer would need to fulfill would cause development costs to soar. These factors make the sites unsuitable for affordable housing. The only acceptable course of action is to eliminate the sites from the inventory. Below is a list of the unique natural features, hazards, and limited resources in the Tam Valley, Almonte, and Manzanita lowlands that constrain development and population growth and substantiate our argument. For a quick overview of these constraints, please view the attached table. I. Dangerous Traffic with Unacceptable Level Of Service – LOS "F" Of Local Roadways:. II. Flooding, 100 Year Floodplain, Impending Sea Level Rise III. Filled Marsh Areas With High Seismic Activity, Liquefaction, Subsidence and Mud Displacement. IV. Air Quality & Noise: Increased Risk of Residents Developing Serious Illness Due to Living Near Major Roadways. V. Hazardous Materials: For additional information regarding potential health impacts to workers and future residents who may be exposed to hazardous soil conditions, related to past uses, in Tam Junction and Manzanita, please follow the below link to read the comment letter by Technical Expert Matt Hagemann. VI. Endangered Special Status Species. VII. Insufficient Services & Public Transit. VIII. Historic Wetlands and Baylands Corridor. IX. Historic Marshland That Could Be Restored. 160 Shoreline Hwy and 260 Redwood Hwy Frontage Rd. are historic marshland. X. High Density Development Is Not Consistent With the Traditional Character Of The Local Semi-Rural Communities. Conclusion: The County now has sufficient information to understand that the proposed Tam Valley, Almonte, and Manzanita Sites are inappropriate for inclusion in the 2023-2031 Housing Element Candidate Housing Sites Inventory. Not only would construction of housing on these sites exacerbate the already existing problems but doing so when the County admits in the Marin Countywide Plan EIR and 2012 Housing Element's FSEIR that significant adverse unavoidable impacts would result from such construction defies logic. Moreover, there can be no benefit that would override the impacts of environmental harm and severe illness, injury or loss of life from building on the Tam Valley, Almonte, and Manzanita Candidate Housing Sites, which are laden with environmental constraints and dangerous hazards. The best course of action would be for the County to revise the list to reflect the current problems with traffic, seismic activity, hazardous soil conditions, air and noise pollution, water supply, flooding, and impending sea level rise and to find that no new residential development in the Tam Junction & Manzanita areas is appropriate. Such action would be consistent with the Board of Supervisors' sensible decisions.	Email (See Email Comments Received.PDF, pp. 123-151)	X	X	X	X		X		X	X	X	X	X	X	X		

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B - 160 Shoreline Highway (Almonte)	(Comment edited for length) Sustainable TamAlmonte has the following comments and recommendations regarding the merits of the above referenced Tam Valley, Almonte, and Manzanita Candidate Housing Sites listed in the 2023-2031 Housing Element DRAFT Candidate Housing Sites List. Due to the unique characteristics of the area, encouraging residential development, especially high-density development, at the above referenced Sites would increase the risk of undue harm to the environment and undue hardship, illness, injury and/or death to the current and future residents. The Tam Valley, Almonte, and Manzanita commercial lowlands, in which the above referenced sites are located, experience the most number of environmental constraints and hazards of any area in Unincorporated Marin. Both the Marin Countywide Plan's EIR and the 2012 Housing Element's SEIR demonstrate that development at these sites would exacerbate the existing dangerous conditions and add new significant adverse environmental impacts (which) magnifies the probability that a tragedy would ensue and the multiple mitigations that a developer would need to fulfill would cause development costs to soar. These factors make the sites unsuitable for affordable housing. The only acceptable course of action is to eliminate the sites from the inventory. Below is a list of the unique natural features, hazards, and limited resources in the Tam Valley, Almonte, and Manzanita lowlands that constrain development and population growth and substantiate our argument. For a quick overview of these constraints, please view the attached table. I. Dangerous Traffic with Unacceptable Level Of Service – LOS "F" Of Local Roadways:. II. Flooding, 100 Year Floodplain, Impending Sea Level Rise III. Filled Marsh Areas With High Seismic Activity, Liquefaction, Subsidence and Mud Displacement. IV. Air Quality & Noise: Increased Risk of Residents Developing Serious Illness Due to Living Near Major Roadways. V. Hazardous Materials: For additional information regarding potential health impacts to workers and future residents who may be exposed to hazardous soil conditions, related to past uses, in Tam Junction and Manzanita, please follow the below link to read the comment letter by Technical Expert Matt Hagemann. VI. Endangered Special Status Species. VII. Insufficient Services & Public Transit. VIII. Historic Wetlands and Baylands Corridor. IX. Historic Marshland That Could Be Restored. 160 Shoreline Hwy and 260 Redwood Hwy Frontage Rd. are historic marshland. X. High Density Development Is Not Consistent With the Traditional Character Of The Local Semi-Rural Communities. Conclusion: The County now has sufficient information to understand that the proposed Tam Valley, Almonte, and Manzanita Sites are inappropriate for inclusion in the 2023-2031 Housing Element Candidate Housing Sites Inventory. Not only would construction of housing on these sites exacerbate the already existing problems but doing so when the County admits in the Marin Countywide Plan EIR and 2012 Housing Element's FSEIR that significant adverse unavoidable impacts would result from such construction defies logic. Moreover, there can be no benefit that would override the impacts of environmental harm and severe illness, injury or loss of life from building on the Tam Valley, Almonte, and Manzanita Candidate Housing Sites, which are laden with environmental constraints and dangerous hazards. The best course of action would be for the County to revise the list to reflect the current problems with traffic, seismic activity, hazardous soil conditions, air and noise pollution, water supply, flooding, and impending sea level rise and to find that no new residential development in the Tam Junction & Manzanita areas is appropriate. Such action would be consistent with the Board of Supervisors' sensible decisions.	Email (See Email Comments Received.PDF, pp. 123-151)	X	X	X	X		X		X	X	X	X	X	X	X		
B - 160 Shoreline Highway (Almonte)	As a concerned Mill Valley resident, I am writing to endorse TamAlmonte's letter to you re. the merits of Tam Valley, Almonte, & Manzanita Draft Candidate Housing Sites. Please think very carefully about sites, due to concerns about flooding, traffic and at times extreme fore danger with needed evacuation routes.	Email				X					X			X				
B - 160 Shoreline Highway (Almonte)	ATTACHMENT from Tam Design Review Board: Suggested Additional Policies to be Included in the Housing Element: 1. Wildfire Risk: Use mathematical modeling to investigate and predict wildfire risk. Prohibit the building of housing (even ADUs) in fire critical areas. 2. Flood Risk: Prohibit new housing in areas at risk of flooding from storm surge or sea level rise. 3. Bothin Marsh: Require all new development adjacent to Bothin Marsh to supplement and follow the policies that are designed to preserve the marsh. Given the County's recent efforts to restore and preserve the marsh, it makes no sense to select a site adjacent to the marsh for any form of dense development. 4. Evacuations: Require that new housing development along Shoreline Highway trigger a study and redesign of the traffic patterns to ensure that any new housing development in that area will not worsen traffic or increase the threat to life safety during an evacuation. Any assessment of traffic impacts of emergency evacuation should include new housing developments in the City of Mill Valley, as Shoreline Highway is the only exit should East Blithedale become blocked. 5. Short Term Rentals: Eliminate short-term rentals completely, or allow only on-site, owner-occupied properties to have short-term rentals. If someone does not live on-site, then the property is arguably an investment property only, and any claim of the need for that short-term rental income can be disregarded. This would enable ADUs to be counted toward the Housing Element numbers (see item #10). 6. Vacancies: Create a County mandated vacancy tax (as San Francisco is presently considering) to create disincentives for leaving housing units empty. Exemptions could be made for work from home or dwellings under a certain square footage if the homeowner works from home or needs the space for their own dwelling use. This has been documented to establish new housing units and therefore could be counted toward the housing numbers. 7. Speculative Investment: Eliminate corporate ownership of housing of up to 4 units. This will stop speculative over-bidding of properties (which drives up housing costs) and land banking (which is performed to drive up the value for the investors.) This is crucial for market rate units that do not have controls over ownership. If dwelling units are constructed and snatched up by corporate investors, the goal of increasing availability will not be achieved. If the housing crisis is still occurring after another eight years, the next round of RHNA numbers will be even higher, and even more density will be demanded. 8. Promote Affordability: Require that all lot splits and ADUs rent at affordable rates. This would enable ADUs to be counted toward the Housing Element numbers that are required for affordable units, which are the most difficult to achieve (see item #10). The Planning Department should not look at undersized parcels as a hardship that allows for an exemption to exceed the FAR. Instead, it should be taken as a limitation on the lot that will provide a smaller home, which will ultimately result in a diverse range of housing options and levels of affordability. 9. Conversions: Provide incentives to preserve the existing stock of affordable housing and/or promote the conversion of existing market rate housing to affordable housing. Tam Valley in particular has a large number of rental units which have traditionally been at the affordable end of the rental spectrum, and could readily be maintained as such with the necessary incentives. 10. Alternative Measures: Follow the Housing Element guidelines to promote and locate alternative housing sites as per recommended policies #5, 8, and 9 above. These guidelines state that acceptable dwelling unit numbers can be counted through "the availability of ADUs and JADUs for occupancy, rather than used as offices or guest houses." (p. 30) In addition: "Alternative adequate sites: Under limited circumstances, a local government may credit up to 25 percent of their adequate sites requirement per income category through existing units that will be: substantially rehabilitated in a multifamily rental or ownership housing complex of three or more units that are converted from non-affordable to affordable rental; preserved at levels affordable to low – or very low – income households, where the local government has provided those units with committed assistance." (p. 30)	Email																
B - 160 Shoreline Highway (Almonte)	I am writing to endorse the attached letter from Sustainable TamAlmonte to the Marin County Board of Supervisors and Planning Commission regarding the merits of the proposed Tam Valley, Almonte, and Manzanita Candidate Housing Sites listed in the 2023-2031 Marin County Housing Element DRAFT Candidate Housing Sites List. The need for housing our homeless is desperate but building residential space at Tam Junction is just NOT logical. The idea of building along Shoreling/ Highway 1 is very questionable. It is already a populated area with minimal sidewalks and access to needed resources. Thank you for your consideration of the attached letter	Email	X	X	X	X		X		X	X	X	X	X	X	X		

Location	Comment	Source	PCL	INF	SER	TRF	PRK	PTR	ACT	NMR	SEA	NAT	CUL	FIR	WAT	HLT	EQT	GDL
B - 160 Shoreline Highway (Almonte)	We are writing in regard to the sites chosen for possible inclusion into county plans for housing in the Almonte/Tam Valley area of the county. Of the eight sites mentioned in your Balancing Act scenario, five are in a serious flood zone and one is located, not on, but in Richardson's Bay. Your commentary regarding the avoidance of environmental hazards has been completely ignored by whatever staff was used to choose these sites. The properties in the flood zone are 160 Shoreline, assessor's parcel # 052-041-27, 217 Shoreline, 223 Shoreline, and 204 Flamingo Rd. he site which is actually in the bay is 260 Redwood Hwy. Oddly enough, there is one property across the road from 160 Shoreline which is on solid ground. That would be the Muir Woods Lodge, a motel which actually has some open space which could be used for more housing. Why was this property ignored when lesser properties were chosen? Considering that we are familiar with the sites in the Almonte/Tam Valley area but not the rest of the county, it seems very strange that your staff has chosen properties which flood now and will continue to flood even more in the future. We wonder about your motivation in focusing on dangerous and inappropriate land. We also wonder why your staff has chosen properties which are pretty much lumped together in the same area which will further exacerbate the level F traffic problems which occur for us every day. If these sites were chosen to be close to public transportation, we would remind you that there is no viable public transportation in our area. So we would be looking forward to much more daily auto traffic. We are extremely disappointed in the Balancing Act which appears to be a distraction and of no practical value. We wonder how much time and money was wasted on promoting this ridiculous game. We also wonder how many sites in the rest of the county are totally inappropriate but are being promoted as a way to choose our fate which, as you know, is not the case. Surely, the Board of Supervisors can do better than promoting this silly distraction rather than facing what is a serious problem for the future well being of Marin County.	Email				X		X			X							
B - 160 Shoreline Highway (Almonte)	We oppose new housing in the areas mentioned in Tam Junction due to flooding and traffic and possible fires, can't get out of here now. Tell Scott Wiener and his friends to move on.	Email				X					X			X				
B - 160 Shoreline Highway (Almonte)	Yesterday afternoon, I had the pleasure of speaking with Ms. Clark about the wisdom (actually, the lack of it) in the choice of potential sites around Tam Junction. Last night, I participated in the "roadshow" and, as a result, I am asking for your help in following up on one matter. During the presentation by Jose Rodriguez, he mentioned that one of the "Guiding Principles" for the BOS is the consideration of "environmental hazards". It doesn't take long to recognize the hazards of sea level rise, a long history of flooding and traffic in our neighborhood, among others. But, in addition, Mr. Rodriguez made an interesting rejoinder to a question about whether certain sites can be included in this study if such sites have been previously reviewed and rejected. He was not too clear but he suggested that the State of California has some "requirements" if a previously rejected site is again brought up for analysis. I asked him to specify (1) which of the four Tam Valley sites have already been considered and rejected, and (2) what are the state's requirements (if any)--that are different or additional--that would apply to such sites. He did not have the information available to answer either question and it didn't appear to me that there would be much of an effort to research those questions and disseminate the answers. Hence, this email. Do you know the answers? If not, would you please put in motion an effort to discover the answers? It may not be dispositive, but then again, it may be important.	Email				X					X	X						
Bon Air Shopping Center (Greenbrae)	you should add this is your list of housing element sites. This land could accommodate many units, it is very close to public transportation and have plenty of available parking.	Email																X
D - Los Ranchitos Road (Los Ranchitos)	(Comment edited for length) The homeowners and residents of Los Ranchitos (LR) strongly believe that re-zoning LR for denser housing in inappropriate and short-sighted and strongly oppose this change. As you prepare the Housing Element for 2023-30, please take the following into consideration: 1. Incorrect categorization of parcels as “underutilized residential.” As a neighborhood, and in terms of its past and current deeds, land use and zoning designations, LR is fully built out. LR was founded and developed on the basis of one (1) single family dwelling per parcel, with the minimum parcel size of 1 acre. For this reason alone, rezoning is undesirable to the property owners. There are few if any unbuilt lots, and the few that may exist are highly sloped properties up steep, one-lane streets, likely private roads maintained by the property owners themselves, not by the County. These are wholly inappropriate for multi- family development.2. Arbitrary categorization of parcels as “underutilized residential.” Not all the properties in LR are highlighted in the map. The assignment of properties as “underutilized residential" on the basis of property improvements is inconsistent and incorrect. Many properties that have been extensively remodeled are incorrectly designated as “underutilized.” Many properties that have not been remodeled are not designated as “underutilized,” when under the County’s own definition, they should be. These designations are arbitrary and inconsistent, and inconsistent with reality. 3. Incorrect Improvement-to-land ratios on property tax records. We disagree with the County’s assessment of LR properties as “underutilized residential” according to the definition presented. Properties in LR have been maintained and are being lived in and enjoyed mainly by owners in residence. The high land to improvements ratio most likely results less from remodeling than from continuous, long-term property ownership under Proposition 13. Since many properties have not changed hands in recent years or even decades, or are passed on from one generation to the next, their values have not been updated by recent market conditions and values. 4. Steeply sloped streets and properties. There would be issues with parking, fire safety, and most importantly, evacuation in the event of fire or other emergency. 5. Even if rezoning occurs, multi-family housing won’t actually be built. Our property owners are here because they enjoy and want to continue to enjoy the rural, spacious, and natural character of our neighborhood and our single-family homes on our minimum 1-acre properties. You can put numbers down on paper now, but unless developers force their way into the neighborhood onto a very few parcels, denser housing will not actually be built. It will not be sufficient to solve housing issues in Marin County or to satisfy the aims of RHNA for the county. 6. Rezoning will destroy the rural nature of LR. 7. Fire hazard in the Wildland Urban Interface (WUI). 8. Emergency Vehicle Entry, Evacuation and Egress. 9. Cumulative effects of additional housing at Northgate. The only way into and out of the LR neighborhood is LR Road. The addition of hundreds if not over a thousand (1,100) new units of housing at the Northgate mall site and in Terra Linda will greatly exacerbate traffic and gridlock under normal circumstances and create a huge potential for loss of life in the event of major emergencies like fires or earthquakes. 10. Loss of Agricultural zoning. 11. Water in Marin County. 12. Water in LR. 13. Lack of suburban infrastructure in LR. 14. Many ephemeral creeks divide properties into smaller portions. The presence of these watershed elements would greatly limit the amount of land that can be covered by additional housing as well as the location of where such housing that could be built. 15. Many utilities easements bisect properties. 16. LR is a wildlife corridor. We would be happy to host planner(s) in actually viewing and experiencing our neighborhood so they can come to understand just how inappropriate multi-family housing would be here. If you have any questions or would like more information about our neighborhood and our input to the Housing Element process, please don’t hesitate to contact us directly.	Email (See Email Comments Received.PDF, pp. 64-74)	X	X		X				X		X		X	X			

Location	Comment	Source	PCL	INF	SER	TRF	PRK	PTR	ACT	NMR	SEA	NAT	CUL	FIR	WAT	HLT	EQT	GDL
D - Los Ranchitos Road (Los Ranchitos)	(Comment edited for length) The homeowners and residents of Los Ranchitos (LR) strongly believe that re-zoning LR for denser housing in inappropriate and short-sighted and strongly oppose this change. As you prepare the Housing Element for 2023-30, please take the following into consideration: 1. Incorrect categorization of parcels as "underutilized residential." As a neighborhood, and in terms of its past and current deeds, land use and zoning designations, LR is fully built out. LR was founded and developed on the basis of one (1) single family dwelling per parcel, with the minimum parcel size of 1 acre. For this reason alone, rezoning is undesirable to the property owners. There are few if any unbuilt lots, and the few that may exist are highly sloped properties up steep, one-lane streets, likely private roads maintained by the property owners themselves, not by the County. These are wholly inappropriate for multi- family development.2. Arbitrary categorization of parcels as "underutilized residential." Not all the properties in LR are highlighted in the map. The assignment of properties as "underutilized residential" on the basis of property improvements is inconsistent and incorrect. Many properties that have been extensively remodeled are incorrectly designated as "underutilized." Many properties that have not been remodeled are not designated as "underutilized," when under the County's own definition, they should be. These designations are arbitrary and inconsistent, and inconsistent with reality. 3. Incorrect Improvement-to-land ratios on property tax records. We disagree with the County's assessment of LR properties as "underutilized residential" according to the definition presented. Properties in LR have been maintained and are being lived in and enjoyed mainly by owners in residence. The high land to improvements ratio most likely results less from remodeling than from continuous, long-term property ownership under Proposition 13. Since many properties have not changed hands in recent years or even decades, or are passed on from one generation to the next, their values have not been updated by recent market conditions and values. 4. Steeply sloped streets and properties. There would be issues with parking, fire safety, and most importantly, evacuation in the event of fire or other emergency. 5. Even if rezoning occurs, multi-family housing won't actually be built. Our property owners are here because they enjoy and want to continue to enjoy the rural, spacious, and natural character of our neighborhood and our single-family homes on our minimum 1-acre properties. You can put numbers down on paper now, but unless developers force their way into the neighborhood onto a very few parcels, denser housing will not actually be built. It will not be sufficient to solve housing issues in Marin County or to satisfy the aims of RHNA for the county. 6. Rezoning will destroy the rural nature of LR. 7. Fire hazard in the Wildland Urban Interface (WUI). 8. Emergency Vehicle Entry, Evacuation and Egress. 9. Cumulative effects of additional housing at Northgate. The only way into and out of the LR neighborhood is LR Road. The addition of hundreds if not over a thousand (1,100) new units of housing at the Northgate mall site and in Terra Linda will greatly exacerbate traffic and gridlock under normal circumstances and create a huge potential for loss of life in the event of major emergencies like fires or earthquakes. 10. Loss of Agricultural zoning. 11. Water in Marin County. 12. Water in LR. 13. Lack of suburban infrastructure in LR. 14. Many ephemeral creeks divide properties into smaller portions. The presence of these watershed elements would greatly limit the amount of land that can be covered by additional housing as well as the location of where such housing that could be built. 15. Many utilities easements bisect properties. 16. LR is a wildlife corridor. We would be happy to host planner(s) in actually viewing and experiencing our neighborhood so they can come to understand just how inappropriate multi-family housing would be here. If you have any questions or would like more information about our neighborhood and our input to the Housing Element process, please don't hesitate to contact us directly.	Email (See Email Comments Received.PDF, pp. 64-74)	X	X		X				X		X		X	X			
D - Los Ranchitos Road (Los Ranchitos)	I am writing in response to the 2023-2030 Housing Element Proposals for the Los Ranchitos area of Marin County. The current proposal for approximately 139 additional units in Los Ranchitos does not consider the safety of residents and the impact on the natural environment. 1. Los Ranchitos is made up of lots on narrow hillside streets, without sidewalks and street lights. Adding more units will increase the difficulty of fighting fires on the upper streets or safely evacuating residents when earthquakes occur. 2. The only way in and out of Los Ranchitos is on Los Ranchitos Road. Traffic on Los Ranchitos Road becomes gridlock today when there is the slightest slowdown on Highway 101. I expect traffic will increase as the proposed housing units in the Northgate Mall are built. Adding more units in Los Ranchitos will make that even worse. 3. Where will the water come from for all of these proposed additional housing units, including the ones outside of Los Ranchitos? We are all reducing water usage to meet current water restrictions. I would think new sources of water should be identified and funded before large scale housing increases are proposed. 4. Los Ranchitos lots were created and deeded to be 1 acre minimum parcels. We are zoned light agricultural, resulting in many barnyard animals and backyard vegetable gardens. The rural nature of this area is what attracted me to this area and I am sure that is true for most of my neighbors. As I noted above, many of our streets are on steep hills. So to get 139 additional units in Los Ranchitos zoning will be changed to allow apartment-like buildings on the flatter streets. This will destroy the rural/wildlife feel to this neighborhood.	Email		X		X			X	X		X		X	X			
D - Los Ranchitos Road (Los Ranchitos)	I find it hard to believe that this many new housing units is even being considered! For the last three years we've been told that we can use only 60 gallons of water a day. And you want to add 1000 more houses in Los Ranchitos? Where does the water come from? Traffic is already insane, and this will add nothing but more gridlock.What about the fire hazards in densely populated areas? I find it absolutely insane that this could even be in anybody's minds. The people that live in this area chose it because of the zoning and the lot sizes. How can you just swoop in and say the "hell with you we're going to do what we want"? What happened to private property rights?	Email				X				X				X	X			
D - Los Ranchitos Road (Los Ranchitos)	I write to express my great objections to the proposed housing element to rezone Los Ranchitos in unincorporated Marin County. It is not well thought out and will have many negative consequences. First, the infrastructure of water, fire protection, education do not support this proposal. Due to the hilly properties and limited egress/ingress greater density will create a major fire liability and risk. Already, only one insurer will write policies for this neighborhood. Second, Los Ranchitos lots were created and deeded to be 1 acre minimum parcels for single family housing. Increasing density here will destroy the rural nature of our neighborhood. Third, Los Ranchitos is a Wildland Urban Interface (WUI). In addition to increased fire hazard, it will greatly affect the native animal habitats of turkeys, owls, deer, foxes and other animals. Fourth, The only way into and out of Los Ranchitos is Los Ranchitos Road. That road is already gridlocked during morning rush hours. The addition of more new housing units in Northgate and Terra Linda will greatly exacerbate traffic and gridlock under normal circumstances, and create a huge potential for loss of life in the event of major emergencies like fires and earthquakes. Adding housing to Los Ranchitos will only make a bad situation worse. Fifth, Los Ranchitos is currently zoned agricultural with numerous barnyard animals kept here. Increased density will adversely affect them as well. This housing element is not well thought out and will be detrimental to health and safety as outlined above. I urge that this plan not be adopted.	Email				X				X		X		X				

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D - Los Ranchitos Road (Los Ranchitos)	I write to express my objections to proposals in the County's Housing Element to rezone the Los Ranchitos area of unincorporated Marin County. While I acknowledge the need for additional housing, and generally support efforts to equitably provide for the good of the greater community, I believe that the proposal to rezone this particular area of the County is misguided. For one thing, the only way into and out of Los Ranchitos is Los Ranchitos Road. As things currently stand, Los Ranchitos is already a very congested road, used as the primary corridor through which people access the Northgate malls, Terra Linda High, Mark Day School and other points west of Highway 101 and in the valley between Central San Rafael and Lucas Valley. Los Ranchitos Road is already becoming a dangerous thoroughfare, particularly at the two Los Ranchitos Road/Circle Road intersections. The planned redevelopment of the Northgate Mall (up to 1,443 residential units, I understand?) is going to put even more pressure pressure on Los Ranchitos Road. The addition of another 80-139 more units in the Los Ranchitos neighbor is going to push things over the edge. Heavy traffic and gridlock will be normal circumstances - a nuisance on a daily basis, but a real safety hazard in the event of a significant emergency or disaster, such as an earthquake or fire. Further, as a Wildland Urban Interface (WUI) area, the Los Ranchitos area already poses a significant risk (so much so that at least one insurer that I'm aware of already refuses to provide coverage to residents of the area). With greater density between them and the only road out, all residents of Los Ranchitos, but particularly this in the hilly portions of the neighborhood (the majority of the current residents) will face a real and life threatening challenge should a wildfire or other disaster strike. Greater density in this WUI will also have an adverse, if not existential, impact on turkey, owl, deer, fox and other animal populations that call the area home. The plan to rezone Los Ranchitos seems to ignore the fact that the area lacks the infrastructure to support any additional development. There are no sidewalks, no streetlights, no access to recycled ("purpose pipe") water. The adequacy of other resources necessary to support additional density in the area (police, fire, schools, etc) also seems tenuous at best. How will these things be provided? Los Ranchitos is currently zoned agricultural. Many of us grow our own produce and as many have horses, goats and other barnyard animals. What are those residents to do and where will those animals go when modest farm homes are replaced with multi-family condos, duplexes, etc.? Los Ranchitos lots were created to be 1 acre minimum parcels for single family housing. The deeds to the lots in the neighborhood limit further development or subdivision. Increasing density here will destroy the nature and character of the neighborhood. It will take from the residents of the neighborhood that very thing which drew them to the neighborhood in the first instance, I realize this may not be the most compelling argument, but I do think its important to realize that what is being propose is not a plan to build something down the road from or adjacent to a residential neighborhood, but a complete and dramatic reconfiguration of the residential neighborhood itself. Finally, the proposal presumes the Los Ranchitos neighborhood is "not currently used to [its] full potential." I realize the lots in Los Ranchitos are larger than many, but does that really mean they are not used to their full potential? Seems like a pretty subjective assessment, unless "full potential" is really just another way of saying "capacity for density." If that's the case, I would posit that there are are a good many other areas of the county that could be made more dense without adversely impacting the quality of life of the persons who live in that area. This proposed Housing Element is ill considered and will be detrimental to health, safety and well being of the community. I am for more housing, but I urge the County to reconsider whether this is the best, or most appropriate place to put that housing.	Email		X	X	X			X			X		X	X			
D - Los Ranchitos Road (Los Ranchitos)	Like many Los Ranchitos residents my wife and I both feel very strongly that we do not think additional development in our agricultural neighborhood is wise. Denser housing will destroy the area, cause additional traffic, eliminate much of the animal friendly atmosphere and potentially be significantly difficult for fire engines and other ingress and egress. Please reconsider and hopefully leave our area the beautiful place that we love.	Email				X				X		X		X				
D - Los Ranchitos Road (Los Ranchitos)	Los Ranchitos Housing Element Sites: I would like to comment about the upcoming Housing Element environmental review. I do not believe that there is infrastructure regarding Safety Elements and Water supply. Our driveways is 8 feet wide up a steep knoll. It is not conducive to adding density housing. The past two years drought, is an indication that we do not have enough rain to sustain our community. If we are to add more housing it will increase water usage. What will happen to the community if the water is not available. Regarding the infrastructure, the roads will need to be addressed. The safety will be more dangerous for emergency vehicles if the roads are full of traffic on two lane roads. Thank you for considering my comments to the environmental review	Email		X		X								X	X			
E - 2 Jeannette Prandi Way (Lucas Valley)	(Comment edited for length) The Lucas Valley Homeowner's Association represents 538 homes in the special R-1:B-LV zoning track in Upper Lucas Valley. We, the Board of Directors of the LVHA, would like to give our support for the efforts to increase housing in Marin County, and offer the following input. To begin with, our State Governor's Housing Plan incentivizes housing in urban centers near transportation and services, to reduce reliance on vehicles and their carbon footprint. If the County chooses a path contrary to the State Plan, and not utilize State funding incentives for urban development, then we ask for a reevaluation of the housing sites identified for our Lucas Valley/Marinwood area. As outlined below, areas 1 - 3 are both contrary to the RHNA requirements and pose a danger for emergency evacuations. There are several sites identified as potential home building sites in our area. 1. Lucas Valley Road / Mt Muir Court 2. Juvenile Detention Center/Jeanette Prandi Way 3. 7 Mt Lassen 4. 530 Blackstone Dr 5. Marinwood Market area. We agree that the Marinwood Market area is a suitable site. It is close to freeway access and has sufficient infrastructure in place, including amenities like food and gas, and can easily absorb new development. Ironically, the relative quantity proposed/identified at this site is comparably less than the quantity for site #2 above, which is a much less suitable site as shown in following comments. There are several factors that make areas 1 - 3 only marginally suitable for new building sites, and therefore should, at best, be only allowed limited building. Factors include: High Wildfire Risk - Single Limited Evacuation Route. Water Shortages. Lack of Infill Infrastructure. Building Atop Unmarked Graves. Zoning Restrictions: The special zoning district for Upper Lucas Valley (R-1:B-LV) limits most buildings to a single story. The district was created in order to adhere to the architectural vision and design aesthetic of Joseph Eichler, a renowned architect highly influential in modern architecture. The existing low income senior living homes on Jeanette Prandi Way are likewise single story. If a housing development is allowed near the Juvenile Detention Center site, 7 Mt. Lassen, or Muir Court, they would have to be single story to maintain the character of the surrounding architectural landscape. This would limit the number of units allowed at these sites. Juvenile Detention Center: The concept of constructing multi-family housing at or adjacent to the Detention Center poses challenging logistical and feasibility issues. The County's attempts to reduce juvenile incarceration has been largely successful; however, not to the point where closure of the facility is possible. Marin County's criminal justice program continues to call for incarceration of violent youth offenders, and does not currently have an alternative detention facility. Consequently, any new housing at the Jeanette Prandi location would be adjacent to the Detention Center. It may be quite difficult to convince a developer to invest in a location where part of the "selling pitch" to residents is proximity to a detention center, particularly given that the facilities at Juvenile Hall are in major disrepair. Long History of Racial Parity. Among the factors the County is reviewing in selecting sites is historical discrimination. Our community has no such history and should not, therefore, be a priority for desegregation. Unlike many restrictive covenants in other neighborhoods in Marin County and across California, our CC&Rs have never contained language restricting homeownership based on race, creed, color or religion. Our community celebrates diversity, and we want to make clear we have no history of resisting it. Indeed, it has been reported by original LVHA members that our community attracted a large number of buyers of Asian descent as it was one of the few areas that they were not discriminated from buying into. Locating Housing Near Services and Transportation: The Board of Supervisors affirmed several principles for deciding potential Housing sites and distribution in 12/2021. The potential Housing sites listed for the Lucas Valley communities seem to ignore the mandate for locating housing near services and transportation. The Lucas Valley Community believes the County should be practical and realistic in identifying sites to satisfy the RHNA requirements that do not create a danger to existing communities, will actually serve the goals of the housing mandate, and that show homage to our beautiful and historically significant community. We respectfully request the County to rethink its "rural" VS "urban" housing development plans in light of the State's most recent Urban Housing strategy and funding incentives.	Email (See Email Comments Received.PDF, pp. 173-178)		X		X				X		X	X	X	X		X	
E - 2 Jeannette Prandi Way (Lucas Valley)	I am concerned since I never received this notice. I learned about it from one neighbor on Thursday 2/24. How were property owners in this area notified? How many homeowners have you contacted. I don't know any who has been notified except the neighbor that told me. Please give me the courtesy of a response. This is a lovely area but with many limitations & constraints for development – infrastructure limited ingress & egress on Lucas Valley Road schools etc. Additionally this is a WUI wildfire area. A recent minor fire caused limited area evacuations. I was evacuated and this small event caused alarming road congestion. In case of a more extensive fire it would be a disaster.	Email		X	X	X								X				

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E - 2 Jeannette Prandi Way (Lucas Valley)	I am writing to urge you NOT to approve the Marinwood/Lucas Valley sites under consideration to satisfy the Association of Bay Area Governments Regional Housing Needs Allocation Plan. Developments at these six sites (St. Vincent's School, Marinwood Market, 530 Blackstone Drive, 7 Mt. Lassen, 2 Jeannette Prandi Way, and Lucas Valley Road near Terra Linda Ridge) would result in more than 2300 housing units. While I know that some of the proposed housing is intended for teachers and other critical workers and for low income housing, both of which are important and necessary, it seems like too much development for the infrastructure of this small area. Additionally, all of these proposed development sites are within the Miller Creek School District boundaries and the unfunded impact of these developments on the District would be disastrous. Since the District is currently funded using a Basic Aid Model, it gets no per pupil funding. This means that all the additional students these developments generate will not result in additional funding for the District.	Email		X	X					X							X	
E - 2 Jeannette Prandi Way (Lucas Valley)	I found the online tools for commenting cumbersome and inscrutable, and much too time consuming to use. So, the following are my comments about specific housing allotment recommendations in Marinwood Lucas Valley.2 Jeannette Prandi Way (site of Juvenile Hall) - 254 100 or less Good location but too many units, must be affordable. Rotary Senior Housing is excellent. Perhaps expand affordable housing for seniors there with larger 2 BR units	Email															X	X
E - 2 Jeannette Prandi Way (Lucas Valley)	I see the maps and have concerns that things aren't matching. I'm not opposed to additional housing, but it should be done gradually and incrementally. I'm concerned about the number of units planned for Jeanette Prandi/Juvi of 254 units. That, I, believe, is WAY more than Rotary Village. It is one thing if it is planned as beautifully as Rotary Village with one-story facilities and have trees and landscaping. It is another thing if you build a 4 story building in the center of the meadow of Marin County Parks.	Email								X		X						
E - 2 Jeannette Prandi Way (Lucas Valley)	I'm taking this opportunity as a resident of Upper Lucas Valley in Marin to voice my views/concerns about the housing sites under consideration in my area: In general: I don't know what constitutes median vs low income, but in general I support add'l housing strategically placed and sensitively designed (to minimize negative impact on the environment and established communities) for essential workers such as school teachers, sheriff, police & fire dept and hospital staffers, many of whom currently commute long distances to work in the areas they serve. I'd like to see new homeowning opportunities (at below market rates) made available to these workers, as building more high-priced rental units serves no one but property owners.Sites under consideration in the Marinwood/Lucas Valley areas: St Vincent's School – 1800; Marinwood Market – 136. These are both logical, less problematic sites for development, as they are walkable to the GG bus stop at/near Miller Creek & Marinwood Aves, with quick, easy access to the 101 fwy. I really hope to see sensitive urban planning on the St. Vincents site, so the beautiful open space currently grazed by cows does not become yet another soulless jungle of buildings standing shoulder to shoulder facing the freeway. Speaking as someone who's actually rooting for the Smart Train to not only survive, but thrive: part of any development of these sites should include a bike path/paths to connect either or both to the Civic Center Smart station. And/or a shuttle bus (it's too long to walk for commuters).530 Blackstone Drive (site of religious house) – 32. I've no knowledge/opinion re: this site. 7 Mt Lassen (site of office park) – 58. 2 Jeannette Prandi Way (site of Juvenile Hall) – 254. My husband & I currently rent an office at 7 Mt. Lassen, so it's news to us that this site's under consideration. It's a beautiful, unique office setting that serves both the Upper and Lower Lucas Valley communities as a place of business to walk to! I'd hate to see that disappear!!! However, I wouldn't be adverse to seeing a portion of the current 7 Mt. Lassen structures converted to work/live spaces, if sensitively planned. Maybe 30%. My comments re: St. Vincents also apply to Jeannette Prandi Way. As long as new development is against the hills with access via Idylberry Rd, away from Lucas Valley Rd, and sensitively planned, I'm not totally adverse to new development. However the # of units proposed is too high!** Lucas Valley Rd/near terra Linda Ridge: 26. I don't know exactly where this is, but in principle I'm against it. **The problem with all new development close to Lucas Valley Rd is not merely degradation of the scenic route of LVR — but more importantly, adding traffic congestion to a wildfire interface area with a single ingress/egress. I'm an LVHA block captain, and was present and part of the fire evacuation on Sept 1st 2021... a learning experience. It's for this reason that I signed the petition against development in Lucas Valley. I believe that the current Northgate Mall could and should be a site for mixed-use development including low-to median income housing, yet is not on this list of proposed sites. It ticks all the boxes for access to transportation, schools, shopping, etc.	Email			X	X		X	X			X		X			X	X
E - 2 Jeannette Prandi Way (Lucas Valley)	my wife and I are long time residents of Lucas Valley and most every day we visit and walk in the delightful redwood lined area in front of Juvi. It is with shock and utter disappointment that I see that this site is being considered for additional apartment housing. In case u have not noticed the traffic on Lucas Valley road is already quite bad especially when inevitably get stopped at the new light on Los Gamos. If this new housing is approved the addl vehicles on the road will be intolerable.. Each new resident will need a car as there is NO reliable public transportation. Would make more sense to be built much closer to hwy 101.. Please do NOT approve this thoughtless proposal	Email				X		X				X						
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E - 2 Jeannette Prandi Way (Lucas Valley)	Thank you for taking time to read over my thoughts on the new housing developments proposed for Jeanette Prandi Way, Mount Muir Court, Marinwood Plaza and 7 Lassen. As a Marin County native of 58 years and a Lucas valley resident of 26 years, I am surprised that these projects are so close to approval without adequate community outreach and input. There are many items of concern that I don't feel have been adequately answered for me to support these developments. At this time I am strongly opposed to these developments. I am respectfully requesting more time for our community to better understand these proposals and how we can collaboratively help the County solve its low income housing challenges.	Email																
E - 2 Jeannette Prandi Way (Lucas Valley)	This letter is in regards to the proposed site and distribution of housing in the Lucas Valley/Marinwood area. While I feel this area can support some expansion, the amount proposed by the county is overwhelming. Per the board of supervisors principles, please note my feedback below. 1: Ensure Countywide Distribution: The majority of housing in unincorporated Marin County is being distributed to Marinwood/LUCAS VALLEY. This does not appear to be an equitable distribution and will potentially double the population of this area, affecting all services- sheriff, fire, schools, traffic, etc. Marinwood/LUCAS VALLEY area is being considered for a majority of this housing in unincorporated Marin: St Vincents: 1800 Marinwood Market: 136 Blackstone (site of religious house): 32 Mt Lassen/deli: 58 Jeanette Prandi/Juvi: 254 Lucas Valley Rd/near terra Linda Ridge: 26 Total: 2306. (This could be up to 60% of the total housing for unincorporated Marin) Households in Marinwood/LUCAS VALLEY currently 2412. (This could potentially double our size)	Email			X	X	X					X			X				
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E - 2 Jeannette Prandi Way (Lucas Valley)	With respect to the Lucas Valley sites being considered as potential housing sites, I submit the following comments: Juvenile Hall Site Master Plan (A copy of the Master Plan and Appendix will be presented to the Board of Supervisors at the March 2, 2021 meeting.): A Master Plan was developed through collaboration of Marin County Supervisor Bob Roumiguiere, Planning Director Mark Reisenfeld, and Lucas Valley Community members. The Master Plan was submitted to the Board of Supervisors and adopted in 1994. The Plan encompasses the Jeanette Prandi and Juvenile Hall sites being considered as housing sites. The Master Plan provides: a. Upper Idylberry Corridor - The plan stipulates the area north of the Idylberry is transferred to the Open Space District, and there shall be no structures or other improvements north of the Idylberry Corridor. b. Lower SE portion of the Juvenile Hall Site - the lower grass area is preserved for recreational uses. c. SW corner of the site (Jeanette Prandi Way) - shall remain as County Administrative and Storage Facilities only. d. Rotary Senior Housing (Jeanette Prandi Way) - shall be limited to 55 units, single story only. e. Juvenile Hall and County Parks Offices - area shall remain as County facilities. No additional development is permitted. The restrictions of the Master Plan prohibit consideration of this entire area for possible housing sites. In addition, all of the Lucas Valley sites are in the wildland urban interface (WUI) zones that contradict Governor Newson's priorities to shift housing away from rural wildfire-prone areas and closer to urban centers.	Email								X		X		X				

Location	Comment	Source	PCL	INF	SER	TRF	PRK	PTR	ACT	NMR	SEA	NAT	CUL	FIR	WAT	HLT	EQT	GDL
G - 155 Marinwood Avenue (Marinwood)	(Comment edited for length) The Lucas Valley Homeowner's Association represents 538 homes in the special R-1:B-LV zoning track in Upper Lucas Valley. We, the Board of Directors of the LVHA, would like to give our support for the efforts to increase housing in Marin County, and offer the following input. To begin with, our State Governor's Housing Plan incentivizes housing in urban centers near transportation and services, to reduce reliance on vehicles and their carbon footprint. If the County chooses a path contrary to the State Plan, and not utilize State funding incentives for urban development, then we ask for a reevaluation of the housing sites identified for our Lucas Valley/Marinwood area. As outlined below, areas 1 - 3 are both contrary to the RHNA requirements and pose a danger for emergency evacuations. There are several sites identified as potential home building sites in our area. 1. Lucas Valley Road / Mt Muir Court 2. Juvenile Detention Center/Jeanette Prandi Way 3. 7 Mt Lassen 4. 530 Blackstone Dr 5. Marinwood Market area. We agree that the Marinwood Market area is a suitable site. It is close to freeway access and has sufficient infrastructure in place, including amenities like food and gas, and can easily absorb new development. Ironically, the relative quantity proposed/identified at this site is comparably less than the quantity for site #2 above, which is a much less suitable site as shown in following comments. There are several factors that make areas 1 - 3 only marginally suitable for new building sites, and therefore should, at best, be only allowed limited building. Factors include: High Wildfire Risk - Single Limited Evacuation Route. Water Shortages. Lack of Infill Infrastructure. Building Atop Unmarked Graves. Zoning Restrictions: The special zoning district for Upper Lucas Valley (R-1:B-LV) limits most buildings to a single story. The district was created in order to adhere to the architectural vision and design aesthetic of Joseph Eichler, a renowned architect highly influential in modern architecture. The existing low income senior living homes on Jeanette Prandi Way are likewise single story. If a housing development is allowed near the Juvenile Detention Center site, 7 Mt. Lassen, or Muir Court, they would have to be single story to maintain the character of the surrounding architectural landscape. This would limit the number of units allowed at these sites. Juvenile Detention Center: The concept of constructing multi-family housing at or adjacent to the Detention Center poses challenging logistical and feasibility issues. The County's attempts to reduce juvenile incarceration has been largely successful; however, not to the point where closure of the facility is possible. Marin County's criminal justice program continues to call for incarceration of violent youth offenders, and does not currently have an alternative detention facility. Consequently, any new housing at the Jeanette Prandi location would be adjacent to the Detention Center. It may be quite difficult to convince a developer to invest in a location where part of the "selling pitch" to residents is proximity to a detention center, particularly given that the facilities at Juvenile Hall are in major disrepair. Long History of Racial Parity. Among the factors the County is reviewing in selecting sites is historical discrimination. Our community has no such history and should not, therefore, be a priority for desegregation. Unlike many restrictive covenants in other neighborhoods in Marin County and across California, our CC&Rs have never contained language restricting homeownership based on race, creed, color or religion. Our community celebrates diversity, and we want to make clear we have no history of resisting it. Indeed, it has been reported by original LVHA members that our community attracted a large number of buyers of Asian descent as it was one of the few areas that they were not discriminated from buying into. Locating Housing Near Services and Transportation: The Board of Supervisors affirmed several principles for deciding potential Housing sites and distribution in 12/2021. The potential Housing sites listed for the Lucas Valley communities seem to ignore the mandate for locating housing near services and transportation. The Lucas Valley Community believes the County should be practical and realistic in identifying sites to satisfy the RHNA requirements that do not create a danger to existing communities, will actually serve the goals of the housing mandate, and that show homage to our beautiful and historically significant community. We respectfully request the County to rethink its "rural" VS "urban" housing development plans in light of the State's most recent Urban Housing strategy and funding incentives.	Email (See Email Comments Received.PDF, pp. 173-178)											X					X
G - 155 Marinwood Avenue (Marinwood)	I am writing to urge you NOT to approve the Marinwood/Lucas Valley sites under consideration to satisfy the Association of Bay Area Governments Regional Housing Needs Allocation Plan. Developments at these six sites (St. Vincent's School, Marinwood Market, 530 Blackstone Drive, 7 Mt. Lassen, 2 Jeannette Prandi Way, and Lucas Valley Road near Terra Linda Ridge) would result in more than 2300 housing units. While I know that some of the proposed housing is intended for teachers and other critical workers and for low income housing, both of which are important and necessary, it seems like too much development for the infrastructure of this small area. Additionally, all of these proposed development sites are within the Miller Creek School District boundaries and the unfunded impact of these developments on the District would be disastrous. Since the District is currently funded using a Basic Aid Model, it gets no per pupil funding. This means that all the additional students these developments generate will not result in additional funding for the District.	Email		X	X					X							X	
G - 155 Marinwood Avenue (Marinwood)	I found the online tools for commenting cumbersome and inscrutable, and much too time consuming to use. So, the following are my comments about specific housing allotment recommendations in Marinwood Lucas Valley. Marinwood Market - 136 100 or less: Best and necessary site for redevelopment, but it should be a mixed use development as was proposed by Bridge Housing some years ago. Housing number should be reduced to under 100	Email								X								
G - 155 Marinwood Avenue (Marinwood)	I hope that the Marinwood Plaza/market site is again under consideration for housing. As you most likely know, some 15 years or so ago, the community shot down an excellent proposal from Bridge Housing. Except for the market, the property remains a derelict eyesore. Many of us in Marinwood would like to see the property improved, including a modest amount of housing development, along with community amenities such as a coffee shop, brew pub, or other gathering place, and other shops such as hair salon, co-working space, etc. It is close to public transportation, schools, and major employers most notably Kaiser. It's a far superior site for development than the St Vincents property which has myriad sea level rise and other environmental challenges, and very little other infrastructure. I hope the property will be on be on tomorrow's meeting agenda.	Email																X
G - 155 Marinwood Avenue (Marinwood)	I see the maps and have concerns that things aren't matching. Then two of the sites are still contaminated from the former cleaners at Marinwood Market Plaza - St. Vincent's and Marinwood Market Plaza. So what happens with the housing planned in these locations?1936 units?	Email														X		
G - 155 Marinwood Avenue (Marinwood)	I'm taking this opportunity as a resident of Upper Lucas Valley in Marin to voice my views/concerns about the housing sites under consideration in my area: In general: I don't know what constitutes median vs low income, but in general I support add'l housing strategically placed and sensitively designed (to minimize negative impact on the environment and established communities) for essential workers such as school teachers, sheriff, police & fire dept and hospital staffers, many of whom currently commute long distances to work in the areas they serve. I'd like to see new homeowning opportunities (at below market rates) made available to these workers, as building more high-priced rental units serves no one but property owners.Sites under consideration in the Marinwood/Lucas Valley areas: St Vincent's School – 1800; Marinwood Market – 136. These are both logical, less problematic sites for development, as they are walkable to the GG bus stop at/near Miller Creek & Marinwood Aves, with quick, easy access to the 101 fwy. I really hope to see sensitive urban planning on the St. Vincents site, so the beautiful open space currently grazed by cows does not become yet another soulless jungle of buildings standing shoulder to shoulder facing the freeway. Speaking as someone who's actually rooting for the Smart Train to not only survive, but thrive: part of any development of these sites should include a bike path/paths to connect either or both to the Civic Center Smart station. And/or a shuttle bus (it's too long to walk for commuters).530 Blackstone Drive (site of religious house) – 32. I've no knowledge/opinion re: this site. 7 Mt Lassen (site of office park) – 58. 2 Jeannette Prandi Way (site of Juvenile Hall) – 254. My husband & I currently rent an office at 7 Mt. Lassen, so it's news to us that this site's under consideration. It's a beautiful, unique office setting that serves both the Upper and Lower Lucas Valley communities as a place of business to walk to! I'd hate to see that disappear!!! However, I wouldn't be adverse to seeing a portion of the current 7 Mt. Lassen structures converted to work/live spaces, if sensitively planned. Maybe 30%. My comments re: St. Vincents also apply to Jeannette Prandi Way. As long as new development is against the hills with access via Idylberry Rd, away from Lucas Valley Rd, and sensitively planned, I'm not totally adverse to new development. However the # of units proposed is too high!** Lucas Valley Rd/near terra Linda Ridge: 26. I don't know exactly where this is, but in principle I'm against it. **The problem with all new development close to Lucas Valley Rd is not merely degradation of the scenic route of LVR — but more importantly, adding traffic congestion to a wildfire interface area with a single ingress/egress. I'm an LVHA block captain, and was present and part of the fire evacuation on Sept 1st 2021... a learning experience. It's for this reason that I signed the petition against development in Lucas Valley. I believe that the current Northgate Mall could and should be a site for mixed-use development including low-to median income housing, yet is not on this list of proposed sites. It ticks all the boxes for access to transportation, schools, shopping, etc.	Email			X	X		X	X		X		X				X	X

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G - 155 Marinwood Avenue (Marinwood)	Thank you for taking time to read over my thoughts on the new housing developments proposed for Jeanette Prandi Way, Mount Muir Court, Marinwood Plaza and 7 Lassen. As a Marin County native of 58 years and a Lucas valley resident of 26 years, I am surprised that these projects are so close to approval without adequate community outreach and input. There are many items of concern that I don't feel have been adequately answered for me to support these developments. At this time I am strongly opposed to these developments. I am respectfully requesting more time for our community to better understand these proposals and how we can collaboratively help the County solve its low income housing challenges.	Email																
G - 155 Marinwood Avenue (Marinwood)	The 2022 Marin County Candidates site for Unincorporated Marin and especially Marinwood/ Lucas Valley/Silveria Ranch is absurd. It targets just 5 square miles with 80% of the housing allocation for affordable housing in one community WITHOUT essential planning for schools, roads, government services, water, sewer and other essential services. Why "plan to fail"? Shouldn't a good faith effort to build affordable housing in our community also include a comprehensive plan for accommodating growth? It doesn't. This is why it should be rejected today. Instead, let's address the core questions for growth AND the financial impact of adding massive amount of largely non profit housing to a single community WITHOUT ADDITIONAL TAX BASE. Marinwood/Lucas Valley currently has approximately 2700 housing units for 6000 residents. The proposed housing sites could add 2300 apartments and 5500 residents who ALL WILL NEED schools, water, government services, transportation, access to shopping, etc. Shouldn't a proper plan for growth precede approval for housing? One of the sites listed is Marinwood Plaza, our communities ONLY commercial plaza within walking distance for thousands of residents. If the plan for 160 units is approved, this would squeeze out a vital community center to the detriment of all. This is not including the problem of TOXIC WASTE contamination clean up suitable for residential dwelling is a long way off despite community pressure on the Regional Water Quality Control Board who will not enforce its own clean up orders on the current owners. Despite the harsh criticism of the RHNA process, I believe there is a real community desire for more affordable housing in a community that will be planned appropriately, won't redevelop our neighborhoods and utilize open spaces like Silveira Ranch, St Vincents and other sites. While everyone I know supports the idea of more housing, not a single one wants a poorly conceived plan that forces large housing projects without considering the impacts. Reject the current RHNA plan until a comprehensive community plan with real public input can be drafted. PS. The "Balancing Act" tool is NOT a serious tool for community input. Less than 25% of the homes under consideration were ever included in the database. I do not find "our database could not handle the data" as a credible reason from the Community Development Department. If you want REAL success seek REAL community support.	Email		X	X					X		X				X		
G - 155 Marinwood Avenue (Marinwood)	This letter is in regards to the proposed site and distribution of housing in the Lucas Valley/Marinwood area. While I feel this area can support some expansion, the amount proposed by the county is overwhelming. Per the board of supervisors principles, please note my feedback below. 1: Ensure Countywide Distribution: The majority of housing in unincorporated Marin County is being distributed to Marinwood/LUCAS VALLEY. This does not appear to be an equitable distribution and will potentially double the population of this area, affecting all services- sheriff, fire, schools, traffic, etc. Marinwood/LUCAS VALLEY area is being considered for a majority of this housing in unincorporated Marin: St Vincents: 1800 Marinwood Market: 136 Blackstone (site of religious house): 32 Mt Lassen/deli: 58 Jeanette Prandi/Juvi: 254 Lucas Valley Rd/near terra Linda Ridge: 26 Total: 2306. (This could be up to 60% of the total housing for unincorporated Marin) Households in Marinwood/LUCAS VALLEY currently 2412. (This could potentially double our size)	Email		X	X	X				X				X				
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G - 155 Marinwood Avenue (Marinwood)	While I am generally in favor of additional low-income housing in Marin, it appears that the proposals for development of Marinwood Avenue turn that are of our neighborhoods (I live across the street) into an area that exclusively low-income housing. Experiments with consolidating low- income housing in the 1960-80's proved to us that this does not work well. These areas become neglected bygovernment and residents alike. Is it possible to make these development more diverse?	Email															X	
H - 1565 Vendola Drive (Santa Venetia)	Hello and thank you for the opportunity to comment regarding Future Housing Sites in Marin County. I attended the local Housing meeting regarding Santa Venetia and Los Ranchitos on February 15th and live in the Santa Venetia area. Here are my comments from a Santa Venetia resident perspective: 1. The process, while advised by the Marin County Planning Department, is being run by a consulting agency that is not familiar with Marin County and the local areas & neighborhoods. 2. The number of assigned housing units to Santa Venetia, 422, ignores the following. Before housing site numbers are assigned and accepted, a "CEQA-lite" analysis should be performed to determine if the numbers and locations are practical from a CEQA perspective. We heard these concerns brushed off with the response that if any development is going to be done, a full CEQA would be completed before development could/would proceed. This would be an "after-the-fact" process, with the fact that the housing numbers and sites have already been assigned and accepted, and would be too late to be influential in the development process. a. There is only one practical vehicle road out of Santa Venetia to the freeway that is already heavily impacted by three schools, the one at the JCC, the Marin School, and Venetia Valley school, and a large pre-school. Traffic in & out of Santa Venetia is also already heavily impacted by the JCC, the Civic Center traffic, the Marin Lagoon traffic, the Veterans Memorial traffic, the Marin Lagoon Housing and the commercial enterprises along McInnis Parkway. b. Some of the sites selected are in wetlands areas, such as the McPhail school site next to North San Pedro Road. c. some of the sites selected are next to the Bay and subject to special development restrictions, such as the McPhail school site. d. The total number of housing units assigned to Marin County, and not just to the unincorporated areas, does not take into account the water needs. And we, Marin County as serviced by MMWD, are in the middle of a water shortage with future years looking to be worse due to Climate Change. 3. Using city limit boundaries to direct neighborhood focus and comment ignores the reality of the holistic nature of a neighborhood that crosses city limits and unincorporated boundaries. It is expedient, especially for an outside consulting firm not familiar with Marin County or Santa Venetia, but not realistic. This is especially true for the Santa Venetia area. Santa Venetia is heavily impacted by what the City of San Rafael does or does not due around the Civic Center, at the intersection of North San Pedro Road and Civic Center Drive, around Marin Lagoon Park, at the Marin Lagoon homes neighborhood, and at the Marin Ranch Airport. Using city limit boundaries is expedient but not accurate and realistic in appraising housing impacts to a neighborhood such as Santa Venetia. And restricting the geographical area that Santa Venetia residents can comment on and have input to, to not include what is inside the City limits of San Rafael for the areas noted above is violating our rights to comment on and have input to what is impacting our neighborhood. Thank you for the chance to comment	Email				X				X				X	X			
H - 1565 Vendola Drive (Santa Venetia)	Here in Santa Venetia, we are living with water shortages, traffic congestion, and our community's evacuation route was named the most dangerous in Marin and yet huge additional numbers of housing are proposed for this flood prone neighborhood. That's insane! We are not fooled by claims that these new residents won't drive everywhere. They will. We already know that every person of driving age in our neighborhood not only drives but owns a car, or truck. They line our streets, further restricting access routes. There are sites where housing can happen like at Northgate Mall, but not in our overcrowded flood zone.	Email				X				X	X			X				
H - 1565 Vendola Drive (Santa Venetia)	Hi, I would like to object to 251 N San Pedro as a site to build housing. There is a Child Center there serving many families. The ball field on the property is used by the children at the school and people in the neighborhood. There are very few ball fields for Little League. This ball field should not be taken away from ball players. I live in the condo complex next door. Parking is already limited for residents and guests. We can't absorb all the people people who would live there who have more cars then the give spots for them and their guests. If housing needs to be built in Santa Venetia why not 1565 Vendola Dr? The school property there has not been used for decades.	Email																X
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H - 1565 Vendola Drive (Santa Venetia)	I am against the proposed units on North San Pedro Road. This proposed project is completely unsustainable and not researched for undesirable living situations. There are many factors that indicate this would not be a good site to build. Factors such as flood control, sea rising at a rate we can expect in the coming years, congestion, removal of a ball park and mostly there are no services to support this project. Well thought out projects include parks, services, bike paths, sidewalks and a reasonable egress in case of fire. North San Pedro Road is all ready congested due to a large school and many churches on this road. Another road to San Rafael is available to Point San Pedro Road however this road is failing due to floods in the winter and very evident sink holes that are not being addressed. More traffic would of course erode the roads further and in the past have had slides on this road particularly after recent tree removal has increased the likely occurance.	Email		X	X	X				X	X	X		X				
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H - 1565 Vendola Drive (Santa Venetia)	I served on the Santa Venetia Community Plan (SVCP) Committee for almost 10 years, including working with County Staff the last 4 years, until its final adoption in 2017. This process included a thorough survey of our neighbors who commented on every empty parcel and open space for future development (and in fact Godbe told us the response was overwhelming with a higher than normal percentage of participation). Our SVCP Committee Members represented every corner of Santa Venetia. We held community meetings (that were well-attended) so all residents had a chance to voice their opinions and ideas. No one knows Santa Venetia better than Santa Venetians. The plan was supposed to cover everything of interest to ensure a diverse, family-oriented, and happy community for years to come. Adding 442 units is simply untenable for a small, working-class hamlet such as Santa Venetia. The last two open spaces (two ball fields) are slated for high density housing. This is totally uncharacteristic of the surrounding neighbors who live in small, single- family housing. In the February 15th Housing Element Zoom call, with County Staff and Contractors from… who knows where?, we were informed that our Community Plan would need to be updated. Who would do this work? When and how soon would these updates happen? How can the County randomly update our Community Plans that we spent so many resources on. SB-9 and SB-10 are a complete contradiction to our Community Plan that we dedicated years of work and volunteer hours to finally see its adoption. These past summers, we've stayed inside due to smoke and/or triple-digit weather. We used a bucket from our shower to water our indoor and deck plants while our yard withered and died due to restrictions and requirements in place from Marin Water. We worked out evacuation routes to alert residents to escape danger due to our one road in and out of Santa Venetia. I heard chain saws, chippers, and weed whackers almost every day, regardless of the high, fire-danger days. This is due to San Rafael Fire Department notifications and requirements. Also, there is currently a plan in place for creekside residents to have their wooden levees raised two feet to protect the sinking, below-sea-level homes in the flood zone (Zone 7), due to Sea Level Rise. The CDA is currently working on a "Safety Overlay Map" to be completed after the Housing Element site are chosen. Isn't this a case of "putting the cart before the horse"? Due to the location of Santa Venetia, nestled before the ripe, fire-prone area of San Pedro Ridge and the rising Las Gallinas Creek, doesn't this deserve a second look and/or consideration of the over-inflated number of units allotted to our small hamlet. When talking to my neighbors, the 422 units sounds so incredulous, they find it impossible to believe. As a volunteer, seasoned Land Use Member, I can't say I blame them. It's mind-boggling. Please reconsider Santa Venetia's allotted housing site numbers.	Email									X			X	X			
H - 1565 Vendola Drive (Santa Venetia)	I will reiterate the comments I made at the February 15 Housing Element meeting… I've lived in SV for over 30 years. I've served on the Santa Venetia Neighborhood Association Board of Directors for almost 30 years. Through our neighborhood association, The Santa Venetia Neighborhood Association (SVNA), we try to get the word out so that our residents are aware of upcoming projects and opportunity to comment. We've heard from Santa Venetia residents that they want to protect our quality of life. We are already concerned about the constant fire danger, flooding, Sea Level Rise, ingress and egress, and unsafe evacuation routes. Climate change is a huge concern for us and as well, we have run out of water in Marin County and are under strict mandates, so I can't understand how adding more and more housing units will help. And to restate, 422 units in SV is an increase of almost 25% of the 1,700-1,800 units we currently had, at last count. It's a very shocking number of additional units for us. I grew up in San Rafael. I hate what they've done to the City and have been constantly disappointed with the building choices and what they have given up. I don't want to see that happening in Santa Venetia – more congestion and loss of our green spaces. Affordable housing sounds great on paper, but we never seem to get that promise fulfilled. I've followed projects in San Rafael and for almost every project, the promise is a huge amount of housing with a small portion designated affordable and then after the project passes through the hurdles, the affordable-housing number is adjusted… always downward. I remember previously rules were passed to keep up with the demand of affordable housing, but the goalposts seem to constantly change and that number is lowered. What is the promise that won't happen with this process? Also, I heard them say at that meeting, they were giving schools and churches more flexibility by allowing them to build on parking lots? If that is the case, where will people park? They've already lowered the parking needed for new building in our communities. We already have overblown congestion, car-to-car parking along the road, and lots of red curbs. The idea of reducing parking requirements for new units AND building on parking required for old units is frightening. And finally, I realize this mandate for housing comes from the state. I believe we (my neighbors) are all on the same page when I ask that you push-back against these mandates. These are not only unrealistic for Santa Venetia but for all of Marin, the wonderful county I grew up in.	Email								X	X	X		X	X		X	

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I - 251 N San Pedro Road (Santa Venetia)	(Comment edited for length) As the directors of Marin Cove Homeowner's Association, and on behalf of the Association, we register our strong objections to plans to turn the Old Gallinas school site into a housing complex. The Marin Cove subdivision is in the Santa Venetia neighborhood. It has 75 units, on single lane streets, and has limited parking areas. The owners are generally single families; some of which have children. The owners, in part due to the limited public transportation, generally use cars to get to and from work. Marin Cove HOA, not the school district, owns the strip of land on the west side of Schmidt Lane separating the field at the Old Gallinas School District from Schmidt Lane. The HOA does not consent to the use of its property to provide access for proposed housing. To the extent the driveway on Schmidt Lane, which crosses the strip of property owned by the Marin Cove HOA, is claimed to be an easement to permit access to the field, if the proposed housing development contemplates the use of such driveway, such is a dramatically increased use of the easement. We do not consent to the use of the driveway to serve a 180- unit development. For the reasons discussed below, we request the removal of the Old Gallinas property from the list of sites proposed for affordable housing. We make these objections based on Government Code section 65852.21 of the Housing Crisis Act ("HCA"), which provides for denial of a proposed housing development project if such project would have a "specific, adverse environmental and social impact," as defined and determined in paragraph (2) of subdivision (d) of Government Code section 65589.5. A significant adverse environmental and social impact means a "significant, quantifiable, direct, and unavoidable impact" [emphasis added], based on objective, identified written public health or safety standards, policies, or conditions. (Govt. Code, § 65580.5(d)(2).) Preliminarily, we object to the lack of notice of consideration of the Old Gallinas school site as a location for affordable housing. The Board only learned of the consideration on Monday, February 21, 2022. In the past, the County posted notices of consideration of proposed construction developments on our streets, or sent circulars to residents, so they could make a reasoned response. Why such notice was not given here is unclear. In the past, Santa Venetia residents have objected to the County's attempts to either build on the Old Gallinas field, or turn the field into a designated dog park. The residents' objections, then, as now, included concerns as to congestion and parking. Due to the lack of notice, we are only able to offer brief comments as to the unsuitability of the planned development in this location. We do not know, for example, whether the proposal is for the entire closure of the child care center, as well as the field. We do not waive any objection to the lack of notice. We reserve all rights to contest the lack of notice. As a very brief summary, the significant adverse impacts posed by the housing development include the loss of needed facilities for childcare and recreational purposes, traffic congestion on our streets, parking problems, and safety concerns created by the inability of emergency vehicles to access our neighborhood during periods of traffic congestion. There are obviously more suitable alternatives which, under the HCA, does not permit disregarding these adverse impacts. First, the loss of a child center (if such is being considered) will dramatically affect local residents who use the center to permit their children to be cared for while they work. The Legislature has declared furnishing facilities for child care serves an important public interest.1 The field is used by children attending the day care center for recreational purposes. It is unfair to conclude such children should not have adequate recreational space. Second, turning to the traffic congestion issue, North San Pedro is only a two lane highway east of Civic Center Drive until approximately Peacock Gap. This roadway is already heavily burdened by parents dropping off and picking up their children (weekdays 8-9:15 am, 3-4 pm), and buses transporting children to and from the Venetia Valley school. Approximately 730 children attend the school. The turnouts built during the modification of the Venetia Valley school have not eliminated the congestion problems. The HCA expressly refers to congestion management, and provides that nothing in the HCA relieves a public agency from complying with congestion management. (Govt. Code, § 65589.5. subd. (e).)	Email (See Email Comments Received.PDF, pp. 75-79)			X	X	X							X				
I - 251 N San Pedro Road (Santa Venetia)	(Comment edited for length) The Northbridge Homeowners Association ("NHA") respectfully submits these initial comments regarding 251 North San Pedro Rd. (herein, "Old Gallinas School and Ball Field")—and also regarding the identified potential sites in Santa Venetia more generally. We very much appreciate the County's consideration of the below comments. Northbridge is a residential neighborhood in Santa Venetia that is adjacent at its eastern end to Old Gallinas School and Ballfield. Northbridge includes 176 single-family homes as well as a neighborhood pool and privately-owned tennis courts. Given our close proximity to Old Gallinas School and Ball Field, any proposed development of that property is obviously of critical interest (and concern) to our residents. The County's draft candidate site list identifies Old Gallinas School and Ball Field as a candidate site for adding an extremely large number of what would have to be high-density housing units in a relatively small space. The NHA has received feedback from some of the residents in our neighborhood. The scope, size, and would-be density of this, alone, are shocking and of great concern to our neighborhood. Old Gallinas School and Ballfield would be a very poor choice/candidate for any significant housing development for multiple reasons: Please Don't Get Rid of Santa Venetia's Only Ball Field. To accommodate a project anywhere near the scope suggested in the draft list would require not only getting rid of the school buildings (which themselves are currently being used for essential child day care services), but also would require getting rid of (i.e., building on top of) the baseball field which currently comprises the majority of the property. This is the only ball field that Santa Venetia has, and it would be absolutely terrible if it were to be lost. Indeed, the Santa Venetia Community Plan specifically identifies as a major priority: "preservation of existing recreational assets in the community such as the…existing ball and play fields." This item was included in the Community Plan because numerous residents identified this specifically (including the Old Gallinas Ball Field, in particular) as a critical neighborhood asset to preserve. Surely, there must be better candidate sites that don't require eliminating the only ball field for an entire neighborhood (and eliminating a desperately-needed day care facility on top of that). Don't Exacerbate an Already Very Serious Traffic Problem. Adding numerous units of housing where the Old Gallinas School and Ball Field is—and, more broadly, adding hundreds of additional housing units to Santa Venetia—would significantly exacerbate an already very serious traffic problem in the neighborhood. Santa Venetia has one way in and out of the neighborhood, and that one road (N. San Pedro Rd.) often backs up significantly, particularly, but not only, during school drop off/pick up times. Even without the potential additional housing identified in the draft candidate site list, the traffic situation in Santa Venetia is already expected to get worse in the near and intermediate term, as San Rafael City Schools apparently intends to expand and increase enrollment at Venetia Valley School and the Osher Marin JCC also has plans to increase the size and enrollment of its school. As to Venetia Valley School, the County apparently has little if any control over development/expansion plans on SRCS school property. Both the current major traffic problems facing the neighborhood and the schools' expansion plans must be considered in evaluating the traffic impact, and ultimately the viability, of adding any material amount of additional housing to Santa Venetia. Simply put, adding hundreds of housing units to this neighborhood, as the draft candidate site list seems to contemplate as a possibility, would further exacerbate a bad traffic situation and, frankly, would not be sustainable for this community. Additional Housing Units Would Exacerbate Emergency Exit Problems. Adding Hundreds of Units of Housing to Santa Venetia Would Materially Impact the Character of the Neighborhood. If even a fraction of the potential housing contemplated as possible by the draft site candidate list were to come to fruition, it would involve adding large housing complexes that are overly-dense and out-of-character for the neighborhood, creating potential noise and quality of life problems for Northbridge and Santa Venetia more generally. The possibility of adding 186 units of housing to Old Gallinas School and Ball Field Site, alone, would be a drastic change for Northbridge and is of great concern to our community which is adjacent to the school/ball field. Any rezoning/approval of additional housing, to the extent it is deemed appropriate, should carefully limit development to something far less dense (i.e., something in line with the current, prevailing residential density in Santa Venetia)	Email (See Email Comments Received.PDF, pp. 87-89)			X	X				X		X	X	X				

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I - 251 N San Pedro Road (Santa Venetia)	Hello and thank you for the opportunity to comment regarding Future Housing Sites in Marin County. I attended the local Housing meeting regarding Santa Venetia and Los Ranchitos on February 15th and live in the Santa Venetia area. Here are my comments from a Santa Venetia resident perspective: 1. The process, while advised by the Marin County Planning Department, is being run by a consulting agency that is not familiar with Marin County and the local areas & neighborhoods. 2. The number of assigned housing units to Santa Venetia, 422, ignores the following. Before housing site numbers are assigned and accepted, a "CEQA-lite" analysis should be performed to determine if the numbers and locations are practical from a CEQA perspective. We heard these concerns brushed off with the response that if any development is going to be done, a full CEQA would be completed before development could/would proceed. This would be an "after-the-fact" process, with the fact that the housing numbers and sites have already been assigned and accepted, and would be too late to be influential in the development process. a. There is only one practical vehicle road out of Santa Venetia to the freeway that is already heavily impacted by three schools, the one at the JCC, the Marin School, and Venetia Valley school, and a large pre-school. Traffic in & out of Santa Venetia is also already heavily impacted by the JCC, the Civic Center traffic, the Marin Lagoon traffic, the Veterans Memorial traffic, the Marin Lagoon Housing and the commercial enterprises along McInnis Parkway. b. Some of the sites selected are in wetlands areas, such as the McPhail school site next to North San Pedro Road. c. some of the sites selected are next to the Bay and subject to special development restrictions, such as the McPhail school site. d. The total number of housing units assigned to Marin County, and not just to the unincorporated areas, does not take into account the water needs. And we, Marin County as serviced by MMWD, are in the middle of a water shortage with future years looking to be worse due to Climate Change. 3. Using city limit boundaries to direct neighborhood focus and comment ignores the reality of the holistic nature of a neighborhood that crosses city limits and unincorporated boundaries. It is expedient, especially for an outside consulting firm not familiar with Marin County or Santa Venetia, but not realistic. This is especially true for the Santa Venetia area. Santa Venetia is heavily impacted by what the City of San Rafael does or does not due around the Civic Center, at the intersection of North San Pedro Road and Civic Center Drive, around Marin Lagoon Park, at the Marin Lagoon homes neighborhood, and at the Marin Ranch Airport. Using city limit boundaries is expedient but not accurate and realistic in appraising housing impacts to a neighborhood such as Santa Venetia. And restricting the geographical area that Santa Venetia residents can comment on and have input to, to not include what is inside the City limits of San Rafael for the areas noted above is violating our rights to comment on and have input to what is impacting our neighborhood. Thank you for the chance to comment	Email					X				X					X	X			
I - 251 N San Pedro Road (Santa Venetia)	Here in Santa Venetia, we are living with water shortages, traffic congestion, and our community's evacuation route was named the most dangerous in Marin and yet huge additional numbers of housing are proposed for this flood prone neighborhood. That's insane! We are not fooled by claims that these new residents won't drive everywhere. They will. We already know that every person of driving age in our neighborhood not only drives but owns a car, or truck. They line our streets, further restricting access routes. There are sites where housing can happen like at Northgate Mall, but not in our overcrowded flood zone.	Email				X				X	X			X				
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I - 251 N San Pedro Road (Santa Venetia)	I attended the zoom meeting a few nights ago. I share the concern of some of my neighbors, well articulated by Gina Hagen. While I totally support affordable housing (so question if this will be "affordable" for working class people), I think we already have too many high density buildings on San Pedro Road, Jcc, school, rest homes, elder affordable housing, civic center etc... So I would support maybe 25 more units or something manageable, but hundreds seems like asking for trouble in an emergency. I live on Labrea way and I am glad we have housing for families, down the street, but a common problem is the amount of cars and high occupancy of some of the apartments. The overflow of cars goes all the way to Rosal, and currently I have had cars parked in front of my house for a month and more. It is not a significant problem in my case, but my neighbor who has teenagers with cars, is having to struggle to park their own cars, while the overflow is from housing two blocks away. Obviously San Rafael is a good place for more housing and i would think a place closer to the freeway like Marin Square could be used for extra units of housing. I also would personally like to build an accessory unit in my front yard for a student, teacher, medical professional, at affordable rate. It would be nice to have a department in Marin county who could help seniors like myself design,, get permits, and loans to afford to create such units. I myself was a renter in Marin for 36 years and lived in in-law apartments. I found it much more private and a win/win solution for the owner, typically older retired person, and myself as young professional. I was excited about an organization called Lily Pads and attended a meeting but found out later the owner was no longer providing services. So this would be a great thing to promote. Thank you for including us in your work. Hope we can have more affordable housing, while preserving the safety of our neighborhoods.	Email					X			X								X	

Location	Comment	Source	PCL	INF	SER	TRF	PRK	PTR	ACT	NMR	SEA	NAT	CUL	FIR	WAT	HLT	EQT	GDL
I - 251 N San Pedro Road (Santa Venetia)	I served on the Santa Venetia Community Plan (SVCP) Committee for almost 10 years, including working with County Staff the last 4 years, until its final adoption in 2017. This process included a thorough survey of our neighbors who commented on every empty parcel and open space for future development (and in fact Godbe told us the response was overwhelming with a higher than normal percentage of participation). Our SVCP Committee Members represented every corner of Santa Venetia. We held community meetings (that were well-attended) so all residents had a chance to voice their opinions and ideas. No one knows Santa Venetia better than Santa Venetians. The plan was supposed to cover everything of interest to ensure a diverse, family-oriented, and happy community for years to come. Adding 442 units is simply untenable for a small, working-class hamlet such as Santa Venetia. The last two open spaces (two ball fields) are slated for high density housing. This is totally uncharacteristic of the surrounding neighbors who live in small, single- family housing. In the February 15th Housing Element Zoom call, with County Staff and Contractors from… who knows where?, we were informed that our Community Plan would need to be updated. Who would do this work? When and how soon would these updates happen? How can the County randomly update our Community Plans that we spent so many resources on. SB-9 and SB-10 are a complete contradiction to our Community Plan that we dedicated years of work and volunteer hours to finally see its adoption. These past summers, we've stayed inside due to smoke and/or triple-digit weather. We used a bucket from our shower to water our indoor and deck plants while our yard withered and died due to restrictions and requirements in place from Marin Water. We worked out evacuation routes to alert residents to escape danger due to our one road in and out of Santa Venetia. I heard chain saws, chippers, and weed whackers almost every day, regardless of the high, fire-danger days. This is due to San Rafael Fire Department notifications and requirements. Also, there is currently a plan in place for creekside residents to have their wooden levees raised two feet to protect the sinking, below-sea-level homes in the flood zone (Zone 7), due to Sea Level Rise. The CDA is currently working on a "Safety Overlay Map" to be completed after the Housing Element site are chosen. Isn't this a case of "putting the cart before the horse"? Due to the location of Santa Venetia, nestled before the ripe, fire-prone area of San Pedro Ridge and the rising Las Gallinas Creek, doesn't this deserve a second look and/or consideration of the over-inflated number of units allotted to our small hamlet. When talking to my neighbors, the 422 units sounds so incredulous, they find it impossible to believe. As a volunteer, seasoned Land Use Member, I can't say I blame them. It's mind-boggling. Please reconsider Santa Venetia's allotted housing site numbers.	Email									X			X	X			
I - 251 N San Pedro Road (Santa Venetia)	I will reiterate the comments I made at the February 15 Housing Element meeting… I've lived in SV for over 30 years. I've served on the Santa Venetia Neighborhood Association Board of Directors for almost 30 years. Through our neighborhood association, The Santa Venetia Neighborhood Association (SVNA), we try to get the word out so that our residents are aware of upcoming projects and opportunity to comment. We've heard from Santa Venetia residents that they want to protect our quality of life. We are already concerned about the constant fire danger, flooding, Sea Level Rise, ingress and egress, and unsafe evacuation routes. Climate change is a huge concern for us and as well, we have run out of water in Marin County and are under strict mandates, so I can't understand how adding more and more housing units will help. And to restate, 422 units in SV is an increase of almost 25% of the 1,700-1,800 units we currently had, at last count. It's a very shocking number of additional units for us. I grew up in San Rafael. I hate what they've done to the City and have been constantly disappointed with the building choices and what they have given up. I don't want to see that happening in Santa Venetia – more congestion and loss of our green spaces. Affordable housing sounds great on paper, but we never seem to get that promise fulfilled. I've followed projects in San Rafael and for almost every project, the promise is a huge amount of housing with a small portion designated affordable and then after the project passes through the hurdles, the affordable-housing number is adjusted… always downward. I remember previously rules were passed to keep up with the demand of affordable housing, but the goalposts seem to constantly change and that number is lowered. What is the promise that won't happen with this process? Also, I heard them say at that meeting, they were giving schools and churches more flexibility by allowing them to build on parking lots? If that is the case, where will people park? They've already lowered the parking needed for new building in our communities. We already have overblown congestion, car-to-car parking along the road, and lots of red curbs. The idea of reducing parking requirements for new units AND building on parking required for old units is frightening. And finally, I realize this mandate for housing comes from the state. I believe we (my neighbors) are all on the same page when I ask that you push-back against these mandates. These are not only unrealistic for Santa Venetia but for all of Marin, the wonderful county I grew up in.	Email								X	X	X		X	X		X	
I - 251 N San Pedro Road (Santa Venetia)	Re: Marin County Housing and Safety Elements Update, 2023 – 2031. The Santa Venetia Neighborhood Association (SVNA) is an organization representing the interests of 1,700 – 1,800 households (4,474 residents per the 2019 census figures) who live in Santa Venetia. As an organization, we are dedicated to the enhancement and preservation of the character and quality of life of the Santa Venetia neighborhood. We do our best to represent our community and have an established reputation to be a voice for proper development. And in accordance with our mission statement, we, the Board Members of the SVNA, feel compelled to comment on this issue. We want to ensure that the Marin County Board of Supervisors receives an accurate impression from our community regarding the updated Housing Element and are writing today to summarize feedback we have heard from many of our members. Many residents of Santa Venetia, including members of the SVNA, attended the February 15 Zoom meeting where consultants representing the interests of the housing element initiative presented online tools for community feedback. We find these tools inadequate; rather than serving as an open platform for the BOS to receive realistic community input, they seem designed to provide information to housing element staff as to where to add more housing. The Housing Element recommends 422 additional units for Santa Venetia. There are currently fewer than 1,800 residences in Santa Venetia, so this represents an increase of approximately 25%— far more growth than the neighborhood has seen for at least two decades. This mandate seems utterly siloed from the worsening reality of global warming and climate change, (the existence of which was recognized both in the Countywide Plan and by the Marin County Civil Grand Jury) which is leading to catastrophic weather events such as fires and flooding. The upland parts of Santa Venetia not directly threatened by flooding are part of the Wildland Urban Interface (WUI) and are subject to year-round fire danger. Like all of Marin, we are constrained by drought, and our water supply comes from tanks that are sited in the WUI. We are actively working actively to protect our homes; parts of Santa Venetia are now Firesafe Marin neighborhoods. Road access to Santa Venetia is highly constricted; we have daily traffic congestion that affects both egress and ingress. The remaining undeveloped parts of Santa Venetia include unstable hillsides that recently led to multiple landslides onto our roadway. All of the issues mentioned above are familiar to the Marin County BOS. They are also the same reasons that Santa Venetia has not experienced anything close to 25% growth in decades. There is no way to grow by 25% using market-rate housing on undeveloped parcels without compromising our safety. The Housing Element directly suggests that our personal safety, including safety from climate events, fire, and safe water supply, is secondary to their objectives of housing growth. One type of growth we believe is needed in Marin County is true low-income housing. By this we mean the type of housing that our current typical Santa Venetia resident could afford. We also support the right of residents to add accessory dwelling units (ADU) to their homes. However, it was clear that the Housing Element does not include plans for significant numbers of low-income housing. Instead, it promotes "market rate" housing, which we know means homes that will sell for millions of dollars each. We are effectively being asked to endanger ourselves to serve the interests of developers to sell multi-million- dollar homes to elite buyers from outside of the region. To paraphrase one of our SVNA members, "The County's first responsibility is for the health and safety of the existing residents of our neighborhood." We ask you to consider this as you move forward. If the intent of the Housing Element is to bypass CEQA process, as alluded to in the Zoom meeting on Feb. 15th, the existence of culturally sensitive resources, including shell mounds in Oxford Valley, still cannot be ignored. Damaging cultural resources of native peoples in order to comply with Housing Element goals would be inconsistent with Marin County values and our historical respect for our earliest Santa Venetia natives. Oxford Valley, the site of known shell mounds, has been designated for 45 "above moderate income" units. Other areas of Santa Venetia may not yet have been properly surveyed for these resources, and bypassing CEQA would also eliminate their protection. These are just a few of the concerns that we have. The SVNA has encouraged our members to send comment letters as well, citing their concerns about this update. Please include those concerns as concerns of the SVNA	Email				X				X	X			X	X		X	

Location	Comment	Source	PCL	INF	SER	TRF	PRK	PTR	ACT	NMR	SEA	NAT	CUL	FIR	WAT	HLT	EQT	GDL
Inverness, Balmoral Way	(Comment edited for length)I am a resident of Old Inverness, specifically Balmoral Way. Please consider the following comments as you finalize your recommendations: The entire approach of this planning effort is misguided. The consultant seems to have arbitrarily plopped new housing onto a map of West Marin without considering County planning history, constraints on the land, or natural resources, let alone community input. This top-down and ill-informed approach is unlikely to succeed, certainly not without damaging community good will, neighborhood cohesion, natural resources and other values of importance. The sites to be developed should be chosen only after a thorough inventory of geology, water supply, slope and other relevant factors. The 2007 Countywide Plan conceived of the entirety of West Marin as a rural, agricultural and low-density region, serving the Bay Area's recreational needs. This reflects the large proportion of the undeveloped lands that are protected as national, state and county parks. Further it carried forward the zoning decisions of the Board of Supervisors in the 1970's, which put a high priority on agricultural and natural resource preservation. If not implemented with great care, this plan risks contravening the supervisors' vision for West Marin. It should not be carried out until the County as a whole considers the larger planning goals for the area. An "elephant-in-the-room" with the housing shortage is the effect of AirBnB. If the County could reign in this business, the housing supply would quickly rebound, with numerous benefits to the community. Additionally, any new regulations for implementing the current planning process must avoid the ironic outcome that the newly constructed residential sites will also be converted to vacation rentals. Indeed, I suggest the County begin its effort to increase housing supply by tackling this behemoth before undertaking the kind of process it is currently engaged in. Assuming willing sellers of residential properties can be found on Balmoral Way, developers will find they are unsuitable for high density projects. Most of the lots slope steeply downhill to a floodplain of Second Valley Creek to the north or a smaller riparian zone to the south. The California Coastal Commission has jurisdiction over the whole neighborhood; this circumstance will render any permitting process lengthy, difficult and expensive. No sewers are available in Inverness. The Coastal Commission has already reacted negatively to the prospect of increasing the number of septic systems due to the likelihood that more leachate will be detrimental to the already-poor water quality of local streams and Tomales Bay. The Inverness Public Utility District is already struggling to meet the current demand for water. This past summer, we were forced to accept severe limits on usage. With the uncertainty that climate change is bringing, it would be risky to assume that the 2021 drought is unlikely to be repeated. Inverness is unsuitable for low-income housing. First, the price of undeveloped land is decidedly high. Additionally, there are few jobs to be had in West Marin and the availability of public transportation for commuting to jobs in east Marin is almost nil. Accordingly, any new residential construction should be geared for moderate to high income residents. The Inverness Community Plan, (adopted in 1983)(ICP) provides little support for the concept of substantially increasing housing and for good reasons: The Plan states that even then, there was insufficient water for new connections. There is no potential for municipal wells on Inverness Ridge and although wells were stated to be feasible in the alluvial fans, the Coastal Commission is unlikely to allow them. Grading of Inverness's hilly lots in preparation for construction would significantly increase sedimentation of our creeks and the Bay. The Old Inverness neighborhood is already close to complete buildout. The entire town of Inverness has poor transportation resources. As noted above, public transportation is not readily available. The ICP notes that the "likelihood of improved transit service to and from the Inverness Ridge Planning Area is remote at best." The roads are narrow and, in many cases, do not allow two-way traffic. Moreover, there is only one road leading in and out of the town, Sir Francis Drake Boulevard. In the increasingly likely event of a wildfire, serious and potentially dangerous congestion and traffic is likely to occur during an emergency evacuation. Additional population would exacerbate this risk. In sum, adding substantial quantities of new housing to Inverness would require a significant revision to the Countywide Plan and the Inverness Community Plan, policy changes at the Coastal Commission and greatly increased sanitary facilities. Even if these hurdles can be overcome, the lack of water resources and the emergency evacuation challenges would require a significant reduction in the scale of the	Email (See Email Comments Received.PDF, pp. 16-19)	X	X		X		X		X		X		X	X	X	X	
Inverness, Balmoral Way	I am writing about the draft list of "underutilized residential housing" in Inverness, specifically those listed on Balmoral Way in Inverness. I am the property owner of 5 Balmoral Way. Imagine my surprise to see my own property (and my house which was fully rebuilt in 2015 with full permits from the county) included on this list as "underutilized residential housing." I was even more surprised to see all of my neighbors' homes on Balmoral Way (in which my neighbors live) to be similarly listed. Obviously the folks who came up with these addresses on Balmoral Way made a significant factual error that needs to be corrected by deleting the Balmoral Way addresses from the list. This isn't about NIMBY -- this is simply a factual matter that the listed addresses are not underutilized housing sites. Balmoral Way is a small, one-lane, private, dirt road with no empty lots. Each lot is already built on and fully-utilized. Each lot has a steep incline. All lots are near the water of Tomales Bay and highly constrained in terms of septic system expansion. While perhaps we residents of Balmoral Way should consider it an honor to be listed as the epicenter of underutilized residential units in Inverness, alas, it is an error by those who compiled the list and is divorced from reality. In summary, as a simple factual matter, the housing stock on Balmoral Way in Inverness is fully-built-up and fully-utilized and should not be listed as "underutilized"; all the Balmoral Way addresses on the "underutilized" list should be removed. Thank you for your kind consideration of this request to correct clear and obvious factual errors in the county's data.	Email	X							X					X			
Inverness, Cottages at Point Reyes Parcel	Re: Cottages at Point Reyes Seashore parcel, Inverness. This parcel is inappropriate for proposed development for two very serious reasons: 1) it is in a high fire danger zone, and 2) is prone to floods and landslides. 1: The adjacent hundred+ acres of private and public bishop pine forest is long untended and seriously overgrown with brush and dead trees, and has not burned in almost 100 years. Wildfire in the canyon would directly threaten our family homes and all our neighbors on Pine Hill Road, Kehoe Way and Vision Road, in addition to all of the residents of Seahaven on the north. 2: The canyon was damaged in the 1982 storms, which unleashed large amounts of mud and rock, and woody detritus, into the bottomlands, and it is unstable as far as landslide danger (take note of the problems on Sir Francis Drake Blvd. above). Without any doubt, these events will be repeated in the future. For these reasons alone, this is one of the least appropriate areas for future housing. Douglas (Dewey) Livingston	Email									X	X		X				
J - 9840 State Route 1 (Olema)	I think that the proposed low cost housing sites and sizes and the solution is not thought out ! For instance , the 98 homes in Woodacre would create a huge traffic problem and also be inappropriate . The Olema location and proposal would ruin the nature of Olema ! And Dennis Rodoni lives in Olema ! The west Marin area has been protected for a reason ! The nature and small town is the reason that we are all here ! I've lived here for 46 years and believe that it would be more appropriate to absorb the housing on properties that are all ready developed and make it attractive for homeowners to build ADUs Please revise the thinking around this important topic of affordable housing !	Email								X		X						

Location	Comment	Source	PCL	INF	SER	TRF	PRK	PTR	ACT	NMR	SEA	NAT	CUL	FIR	WAT	HLT	EQT	GDL
K - 1500 Butterfield Road (Sleepy Hollow)	(Comment edited for length) I am a Marin County native, longtime resident of Sleepy Hollow, and a former member of the Sleepy Hollow Board of Directors. I am also a licensed real estate appraiser, and an MAI-designated member of the Appraisal Institute, although I write this letter as a concerned private citizen. This letter pertains to the revised housing element, in particular the San Domenico School site, but these points apply equally to all proposed West Marin sites. Sound urban planning supports higher density development along existing highway corridors, and "low" and "very low" income housing should be constructed near employment centers and in areas with adequate public transportation and adequate infrastructure, including shopping, hospitals, schools, etc. None of the West Marin sites offer these basic amenities. In particular, the Sleepy Hollow site at the end of Butterfield Road on the San Domenico School campus is slated for 90 units, of which 56 are "low" and "very low" income. There are several serious problems with the plan, most notably the bulk and size of a 90-unit development in a low-density, semi-rural location. The major issues are as follows: 1. The Sleepy Hollow site (San Domenico campus) is zoned for a minimum density of 1 dwelling unit (d/u) per 10 acres. The San Domenico parcel is +/-551 acres, so the maximum allowable number of units is 55 units, and probably far less, once slope is factored in. The current allocated number of 90 units far exceeds the County's own General Plan. 2. The height and bulk of a 90-unit development is incompatible with the low-density and semi- rural character of Sleepy Hollow, where the existing zoning is one acre minimum lot size. Assuming 1,000 square feet per unit, the building will be a minimum 90,000 square feet. Assuming 4 stories (well above the current allowed height restriction) and an 85 foot width, the length would be +/-265 feet, far larger than any current commercial building in Fairfax or San Anselmo with the exception of Safeway and Rite Aid in Red Hill Shopping Center. Onsite parking would certainly be required because the location is 100% auto-dependent. A minimum of 5-7 acres abutting County Open Space would be permanently lost. 3. A development of this size would likely require a significant sewer upgrade. Other infrastructure upgrades might also be necessary to handle an additional 90 households. There are +/-785 existing homes in Sleepy Hollow, so 90 units is a 10% increase in households overnight. A cost benefit analysis should be conducted to see if the project even pencils out. And certainly, an EIR will be necessary. 4. The proposed location is in the wildlife urban interface (WUI) with elevated wildfire risk. Butterfield Road is only road in and out of Sleepy Hollow, and evacuation of residents in case of wildfire has been a major safety concern of the Sleepy Hollow Board for many years. The "Achilles Heel" of Sleepy Hollow is single point of ingress/egress. 5. There is inadequate public transportation to support a 90-unit development, particularly if 56 are "very low" and "low" income units. These households may lack a car, and the location is 100% auto-dependent. 6. The Sleepy Hollow location is over 5 miles to the nearest employment center in San Rafael, and is three miles from the nearest supermarket which is "upscale" (Good Earth) and expensive. It is over one mile to the nearest school, which is currently operating at near full capacity. 7. Of the proposed 90 units, 56 are "very low" and "low" income households, or over 50%. The median HH income is Sleepy Hollow is $255,000, and the average housing price is around $2 million. What formula is used to determine the number of "low" and "very-low" income households that go into a location?	Email (See Email Comments Received.PDF, pp. 99-101)	X		X		X	X		X		X		X		X	X	
K - 1500 Butterfield Road (Sleepy Hollow)	I live in Sleepy Hollow. I am concerned about the San Dominico site (which proposes adding 90 housing units to a community with ~800 households) for two main reasons. 1) Safety. Butterfield is a one way in one way out road. In case of evacuation, increasing the households by over 10% is troubling. Cars at the far end of Butterfield tend to speed. Adding more cars at the very end of the road significantly increases the risk of cars speeding. 2) Traffic. There is almost no public transportation on Butterfield. San Dominico already has a strict traffic commitment with the community because traffic is so bad. This would make it worse. There are three schools which adds to the traffic on Butterfield. Best practices for increasing housing is to do infill in urban areas. This is the opposite. It's building far away from public transportation and freeway access. What makes the most sense is to build as close to highway 101, bus terminals, Smart, etc.	Email				X		X						X				
L - 26500 Main Street (Tomales)	Your proposal to place 186 low-income units on this site is not fair nor does it make sense for the following reasons: You will take away a little league ball field currently used by the nearby communities. t may displace the early development center on the site. he immediate area already supports a section 8 housing community at the corner of North San Pedro and Schmidt Lane. This development will put an unfair burden on the surrounding neighborhood. here is a site at McPhail School down the road on North San Pedro that accommodate the same number of units without removing the little league field and have less visibility to the nearby neighborhood.A s stated in another comment, Bon Air shopping center could accommodate most if not all of these units.	Email			X					X								
Lucas Valley	I do not support the proposed quantity of housing proposed for Lucas Valley. I am concerned about water resources, evacuation congestion in a fire, lack of services for new people in the area, increased road congestion and increased wildfire risk. This is not a NIMBY response. The Rotary Village is a great example of affordable housing for seniors that is near our community which is lovely. Expanding this type of housing would be welcome. Highrises are not welcome as they do not fit-in with our area. greatly reduced quantity of one or two story homes would be welcome. Why are we targeted with such a large percentage of the proposed housing? This is not an equitable plan. thought the Governor wanted housing in urban centers where services were available. Your plan does not meet this key criteria.	Email			X	X				X		X		X	X		X	
Lucas Valley	I have resided in Upper Lucas Valley since 1986. Part of the appeal when I purchased here was the rural setting. Although I understand the need for housing, high density housing is inappropriate for Marin, i.e. large multi-unit structures. I welcome the addition of single family residences as many younger people need homes here desperately. I'm not sure where they would be situated in this area, but am open to suggestions. When George Lucas proposed affordable housing further down Lucas Valley Road, the main concern was the lack of transportation, grocery stores, and the other necessities. It made no sense. Another suggestion would be to make it possible for seniors to give (not sell) their larger homes to their children, purchase smaller homes and retain their property tax base. Most people in that position don't/can't move because buying a smaller home for $1+ million brings with it property taxes they would find unaffordable. The only way it is currently possible is to sell your existing home and buy a cheaper one. When thinking of housing, perhaps the smart thing to do is build an area of affordable homes in the 1100-1500 square foot range for seniors. That would free up many, many existing homes for growing families.	Email			X			X									X	
Lucas Valley	I just want to officially voice my opposition to the development of additional homes in the Lucas Valley area. While I support the development of affordable housing in Marin County, protecting our undeveloped green spaces is an even higher priority. Instead, I believe areas that have already been developed (green space replaced with concrete) such as towns in southern Marin or places like Northgate Mall would be better options for new housing. Our undeveloped green spaces are priceless and irreplaceable!	Email								X		X						
Lucas Valley	It's come to my attention the HOA to which I belong is objecting to proposed increased housing in Lucas Valley. I would like to inform you that the Lucas Valley HOA is not uniform in this opinion. There are members, such as myself, that would welcome additional housing in Lucas Valley. While I found some of the HOA's arguments moderately persuasive (especially with regard to access to public transportation), I believe the need for more affordable housing in Marin trumps all of their points. I encourage you to keep Lucas Valley on your radar for proposed housing sites, and to find ways to encourage and incentivize more public transportation in our community.	Email						X									X	X

Location	Comment	Source	PCL	INF	SER	TRF	PRK	PTR	ACT	NMR	SEA	NAT	CUL	FIR	WAT	HLT	EQT	GDL
Lucas Valley / Marinwood	(Comment edited for length) The Lucas Valley Homeowner's Association represents 538 homes in the special R-1:B-LV zoning track in Upper Lucas Valley. We, the Board of Directors of the LVHA, would like to give our support for the efforts to increase housing in Marin County, and offer the following input. To begin with, our State Governor's Housing Plan incentivizes housing in urban centers near transportation and services, to reduce reliance on vehicles and their carbon footprint. If the County chooses a path contrary to the State Plan, and not utilize State funding incentives for urban development, then we ask for a reevaluation of the housing sites identified for our Lucas Valley/Marinwood area. As outlined below, areas 1 - 3 are both contrary to the RHNA requirements and pose a danger for emergency evacuations. There are several sites identified as potential home building sites in our area. 1. Lucas Valley Road / Mt Muir Court 2. Juvenile Detention Center/Jeanette Prandi Way 3. 7 Mt Lassen 4. 530 Blackstone Dr 5. Marinwood Market area. We agree that the Marinwood Market area is a suitable site. It is close to freeway access and has sufficient infrastructure in place, including amenities like food and gas, and can easily absorb new development. Ironically, the relative quantity proposed/identified at this site is comparably less than the quantity for site #2 above, which is a much less suitable site as shown in following comments. There are several factors that make areas 1 - 3 only marginally suitable for new building sites, and therefore should, at best, be only allowed limited building. Factors include: High Wildfire Risk - Single Limited Evacuation Route. Water Shortages. Lack of Infill Infrastructure. Building Atop Unmarked Graves. Zoning Restrictions: The special zoning district for Upper Lucas Valley (R-1:B-LV) limits most buildings to a single story. The district was created in order to adhere to the architectural vision and design aesthetic of Joseph Eichler, a renowned architect highly influential in modern architecture. The existing low income senior living homes on Jeanette Prandi Way are likewise single story. If a housing development is allowed near the Juvenile Detention Center site, 7 Mt. Lassen, or Muir Court, they would have to be single story to maintain the character of the surrounding architectural landscape. This would limit the number of units allowed at these sites. Juvenile Detention Center: The concept of constructing multi-family housing at or adjacent to the Detention Center poses challenging logistical and feasibility issues. The County's attempts to reduce juvenile incarceration has been largely successful; however, not to the point where closure of the facility is possible. Marin County's criminal justice program continues to call for incarceration of violent youth offenders, and does not currently have an alternative detention facility. Consequently, any new housing at the Jeanette Prandi location would be adjacent to the Detention Center. It may be quite difficult to convince a developer to invest in a location where part of the "selling pitch" to residents is proximity to a detention center, particularly given that the facilities at Juvenile Hall are in major disrepair. Long History of Racial Parity. Among the factors the County is reviewing in selecting sites is historical discrimination. Our community has no such history and should not, therefore, be a priority for desegregation. Unlike many restrictive covenants in other neighborhoods in Marin County and across California, our CC&Rs have never contained language restricting homeownership based on race, creed, color or religion. Our community celebrates diversity, and we want to make clear we have no history of resisting it. Indeed, it has been reported by original LVHA members that our community attracted a large number of buyers of Asian descent as it was one of the few areas that they were not discriminated from buying into. Locating Housing Near Services and Transportation: The Board of Supervisors affirmed several principles for deciding potential Housing sites and distribution in 12/2021. The potential Housing sites listed for the Lucas Valley communities seem to ignore the mandate for locating housing near services and transportation. The Lucas Valley Community believes the County should be practical and realistic in identifying sites to satisfy the RHNA requirements that do not create a danger to existing communities, will actually serve the goals of the housing mandate, and that show homage to our beautiful and historically significant community. We respectfully request the County to rethink its "rural" VS "urban" housing development plans in light of the State's most recent Urban Housing strategy and funding incentives.	Email (See Email Comments Received.PDF, pp. 173-178)			X		X				X		X	X	X	X			X	
Lucas Valley / Marinwood	All of the Lucas Valley sites are in the wildland urban interface (WUI) zones that contradict Governor Newson's priorities to shift housing away from rural wildfire-prone areas and closer to urban centers.	Email										X		X				
Lucas Valley / Marinwood	Due to FIRE danger and Drought please stop more construction in Mount Marin and Lucas Valley.	Email												X	X			
Lucas Valley / Marinwood	I am against housing development down Lucas valley and Marinwood. The weather here gets windy starting in spring and ends in the late fall. The surrounding mountains can catch on fire as we had a small one last year. With the drought we are already under rationing. A spark can create a fire and the wind will carry it all over the place. There are no exits except Lucas Valley road and in case of a fire it will be difficult for all to evacuate. Most locations you are considering are in heavily populated areas. Where would we go i n case of a fire? 101 will be impacted. Yes we need affordable housing, not more multi million dollar homes. If the water department would consider building a desalination plant off the bay of San Francisco it would help us out. We are in global warming and more cars on the road and more pollution will set us back. What about the empty land space between Novato and Petaluma?	Email				X				X				X	X	X	X	
Lucas Valley / Marinwood	I am extremely concerned about the proposed new developments in the Lucas Valley Marinwood area, especially when taken together with other large new development projects in the nearby vicinity. I realize California has a housing issue. However, destroying existing communities is not the solution. The number of added housing units in the LVM area alone will utterly destroy our school system. The Miller Creek School district currently serves about 2000 students. Just one proposal would add 1800 homes and possibly triple our student needs. Where will these children go to school? Similarly, almost 250 homes in the Prandi location would increase the Lucas Valley Elementary school population by a similar 200%. This will overwhelm our schools, and other community services. If there is another huge build at the Northgate site, also in the Miller Creek School district, it's even worse. I'm also worried about many environmental considerations that seem to be ignored. One has only to look at the debacle of the Talus development to see that these plans are not in the interest of the community or environment. These were not affordable homes for teachers and firefighters, but large expensive homes with big lots. Now we have a razed hillside, threats to our creek, destruction of few remaining heritage trees and wildlife habitat and one giant fire hazard with an enormous pile of dead trees and brush. This is what happens when projects are rammed through without proper review and oversight. Traffic increases will be a nightmare. In an emergency, how do we escape with the gridlocks that will occur? Lucas Valley Road and 101 are already jammed with cars especially at commute times. We are in continuing drought, unlikely to ever improve thanks to climate change. Where does the water come from for this new population? A few of the proposed sites make sense but this large scale unbalanced load into our small community does not. Any development should be tailored to fit the need (ie truly affordable housing, not a token 5%) and address community concerns. It's time for our community to have a say in protecting our schools, neighborhood, the environment, and our safety. (Photo attached) Is this what we want Lucas Valley to look like? What an eyesore and environmental disaster for a few houses for rich people (and richer developers). Look at the giant pile of flammable dead heritage trees!	Email				X				X		X		X			X	
Lucas Valley / Marinwood	I am writing in regards to the proposed multi unit housing in Unincorporated Marin County. I'm against using open space to build housing. The site in the open space on Lucas Valley Road should be used for a community park or sports center for the community. Kids need a place to go that could include Basketball, Swimming, Playstructure and lawn for families. I understand the need for additional affordable and Multi-Family housing in Marin, but why Open Space? The County should be looking to improve areas that need improvement, not use open space to pour concrete and build multi level boxes. What about repurposing and improving small strip mall areas all along the freeways? These building have small space and often times run down retail shops and turning those in to thriving shops with housing above. Several responsible counties and cities have successfully done this. Why can't Marin think this way? I don't understand it. Open space should remain open space or for public park use. Dilapidated buildings should should be improved to include affordable housing for the better of the community.	Email										X						
Lucas Valley / Marinwood	I moved to San Rafael specifically to get out of the city and to avoid over congestion, traffic and over development. The proposed additional housing in Marinwood and Lucas Valley will detract from the exact reason I moved here. Over development of north bay is an issue - and just because there is land does not mean it should be developed, which will permanently change the character of the community and landscape. I was unable to sign the petition against the new development, so sending this email instead. Thanks.	Email				X				X		X						

Location	Comment	Source	PCL	INF	SER	TRF	PRK	PTR	ACT	NMR	SEA	NAT	CUL	FIR	WAT	HLT	EQT	GDL
Lucas Valley / Marinwood	I see the maps and have concerns that things aren't matching. The Housing Distribution Scenario says: Ensure Countywide Distribution - really? It looks like a disproportionate amount of it is in unincorporated Marinwood/Lucas Valley - 3,569 units to be exact. And some things to remember: We are a fire danger area now that we have had a fire evacuation this last summer. And what happens to road traffic during an evacuation? And it they don't drive, what happens to them? And what about the Water Shortage in Marin County with conservation being the ONLY SOLUTION so far? It is my understanding that the builders of these units won't have to pay property tax. So what does THAT do to our schools? Fire Department? EMT? And who picks up the tab....Marinwood/Lucas Valley homeowners? And do we pick up the tax tab for ALL THE UNINCORPORATED AREA of 3,569 units? Encourage Infill and Redevelopment Opportunities: Can the residents of these residents drive? Are they close to services, jobs, transportation and amenities? I don't think so, especially if they can't drive.	Email			X	X		X						**X**				
Lucas Valley / Marinwood	The 2022 Marin County Candidates site for Unincorporated Marin and especially Marinwood/ Lucas Valley/Silveria Ranch is absurd. It targets just 5 square miles with 80% of the housing allocation for affordable housing in one community WITHOUT essential planning for schools, roads, government services, water, sewer and other essential services. Why "plan to fail"? Shouldn't a good faith effort to build affordable housing in our community also include a comprehensive plan for accommodating growth? It doesn't. This is why it should be rejected today. Instead, let's address the core questions for growth AND the financial impact of adding massive amount of largely non profit housing to a single community WITHOUT ADDITIONAL TAX BASE. Marinwood/Lucas Valley currently has approximately 2700 housing units for 6000 residents. The proposed housing sites could add 2300 apartments and 5500 residents who ALL WILL NEED schools, water, government services, transportation, access to shopping, etc. Shouldn't a proper plan for growth precede approval for housing? One of the sites listed is Marinwood Plaza, our communities ONLY commercial plaza within walking distance for thousands of residents. If the plan for 160 units is approved, this would squeeze out a vital community center to the detriment of all. This is not including the problem of TOXIC WASTE contamination clean up suitable for residential dwelling is a long way off despite community pressure on the Regional Water Quality Control Board who will not enforce its own clean up orders on the current owners. Despite the harsh criticism of the RHNA process, I believe there is a real community desire for more affordable housing in a community that will be planned appropriately, won't redevelop our neighborhoods and utilize open spaces like Silveira Ranch, St Vincents and other sites. While everyone I know supports the idea of more housing, not a single one wants a poorly conceived plan that forces large housing projects without considering the impacts. Reject the current RHNA plan until a comprehensive community plan with real public input can be drafted. PS. The "Balancing Act" tool is NOT a serious tool for community input. Less than 25% of the homes under consideration were ever included in the database. I do not find "our database could not handle the data" as a credible reason from the Community Development Department. If you want REAL success seek REAL community support.	Email		X	X					X		X				X		
Lucas Valley / Marinwood	This letter is in regards to the proposed site and distribution of housing in the Lucas Valley/Marinwood area. While I feel this area can support some expansion, the amount proposed by the county is overwhelming. Per the board of supervisors principles, please note my feedback below. 1: Ensure Countywide Distribution: The majority of housing in unincorporated Marin County is being distributed to Marinwood/LUCAS VALLEY. This does not appear to be an equitable distribution and will potentially double the population of this area, affecting all services- sheriff, fire, schools, traffic, etc. Marinwood/LUCAS VALLEY area is being considered for a majority of this housing in unincorporated Marin: St Vincents: 1800 Marinwood Market: 136 Blackstone (site of religious house): 32 Mt Lassen/deli: 58 Jeanette Prandi/Juvi: 254 Lucas Valley Rd/near terra Linda Ridge: 26 Total: 2306. (This could be up to 60% of the total housing for unincorporated Marin) Households in Marinwood/LUCAS VALLEY currently 2412. (This could potentially double our size)	Email		X	X	X				X				X				
Lucas Valley / Marinwood	This letter is in regards to the proposed site and distribution of housing in the Lucas Valley/Marinwood area. While I feel this area can support some expansion, the amount proposed by the county is overwhelming. Per the board of supervisors principles, please note my feedback below.4: Consider Environmental Hazards: WATER AND WILDFIRE…. This pertains to most of Marin County. We have a limited supply of resources to accommodate doubling of the population of marinwood/Lucas valley.	Email								X		X						
Lucas Valley / Marinwood	We have seen the preliminary list of potential housing sites for Marin County, including in unincorporated areas such as Marinwood/Lucas Valley, as developed by the ABAG (Regional Housing Needs Allocation Plan), and approved by the California Department of Housing and Community Development. The plan includes 2,412 units within the Lucas Valley / Marinwood area (accounting for 68% of the 3,569 units within unincorporated Marin County). Sites under consideration in the Marinwood / Lucas Valley areas: St Vincent's School - 1,800; Marinwood Market – 136; 530 Blackstone Drive (site of religious house) - 32 7; Mt Lassen (site of office park) – 58; 2 Jeannette Prandi Way (site of Juvenile Hall); 254 LucasValley Rd/near terra Linda Ridge: 26. We are not opposed to some moderate increase of housing units in the area. However, we have some serious concerns regarding these potential sites: (1) The Lucas Valley / Marinwood area currently has less than roughly 1,750 homes, spread across a roughly 3.5 mile valley corridor, almost all of which are single family dwellings, and the overwhelming majority of which are one or two story homes. There are no large multi-unit apartment buildings in this area. The overall magnitude of the increase in units in this area (2,412 units) is disproportionately large compared to the current housing density of the area. The proposed increase would more than double the overall number of housing units in the area. (2) The area to the south and west of St. Vincent's School (east of HWY 101) has been discussed as a potential development site for some time. Although multi-unit housing could easily be developed there, adding 1,800 units would completely overwhelm the property and this very large number of additional units represents an enormous growth for the area, on the same order of units as currently exist in all of Lucas Valley / Marinwood. To fit this large number of units, the development would likely include large three (or more) story structures, which do not currently exist anywhere in this area. (3) The site at 530 Blackstone Drive (current site of religious house) could easily fit a multi-unit development, however 32 units on this site is far too large for the size of the property, which is near the end of a small half-mile residential street, that currently has less than 50 total housing units. (4) The site at 7 Mt. Lassen Drive (currently two relatively small two-story office buildings) is far too small to fit 58 housing units without the new structure extending to three or more stories. (5) The site at 2 Jeannette Prandi Way (south of the Juvenile Hall) is currently an open space area with a loop path that is regularly used by nearby residents (including residents of the nearby senior housing development) as a recreational walking, bike riding, etc. area (and dog walking area). This open space area has been in existence for well over thirty years and is a very popular area regularly used by many residents of the adjoining neighborhoods. A potential development consisting of 254 units on this site would completely eliminate a treasured and much-used open space area and would likely require a multi-story (three or more stories) structure. Very few of the homes in this area of Lucas Valley / Marinwood are more than one story (almost all are one-story Eichler homes). Such a large development is completely out of character with the current land use in this area and should absolutely not be allowed to be developed on this site. (6) These potential new housing units would represent an extremely large additional burden to traffic density in the area. (7) These potential new housing units would overwhelm the current capacity at our three elementary schools and one middle school. (8) These potential new housing units would create a very large additional demand for water resources in the Lucas Valley / Marinwood area which are currently very limited. The simple number (2,412) of potential additional housing units in the Lucas Valley / Marinwood area is much too large and would represent an approximate doubling of the current housing density in the area. Each of the proposed developments presents issues regarding the size of new structures (including constructing multi-story structures in areas where there are currently none), and would present issues concerning current resource capacities (including traffic, schools, and water). Thank you for your consideration of these issues when making decisions regarding potential new housing developments in the Lucas Valley / Marinwood area.	Email				X	X			X		X				X		

Location	Comment	Source	PCL	INF	SER	TRF	PRK	PTR	ACT	NMR	SEA	NAT	CUL	FIR	WAT	HLT	EQT	GDL
Lucas Valley / Mt. Muir Court	(Comment edited for length) The Lucas Valley Homeowner's Association represents 538 homes in the special R-1:B-LV zoning track in Upper Lucas Valley. We, the Board of Directors of the LVHA, would like to give our support for the efforts to increase housing in Marin County, and offer the following input. To begin with, our State Governor's Housing Plan incentivizes housing in urban centers near transportation and services, to reduce reliance on vehicles and their carbon footprint. If the County chooses a path contrary to the State Plan, and not utilize State funding incentives for urban development, then we ask for a reevaluation of the housing sites identified for our Lucas Valley/Marinwood area. As outlined below, areas 1 - 3 are both contrary to the RHNA requirements and pose a danger for emergency evacuations. There are several sites identified as potential home building sites in our area. 1. Lucas Valley Road / Mt Muir Court 2. Juvenile Detention Center/Jeanette Prandi Way 3. 7 Mt Lassen 4. 530 Blackstone Dr 5. Marinwood Market area. We agree that the Marinwood Market area is a suitable site. It is close to freeway access and has sufficient infrastructure in place, including amenities like food and gas, and can easily absorb new development. Ironically, the relative quantity proposed/identified at this site is comparably less than the quantity for site #2 above, which is a much less suitable site as shown in following comments. There are several factors that make areas 1 - 3 only marginally suitable for new building sites, and therefore should, at best, be only allowed limited building. Factors include: High Wildfire Risk - Single Limited Evacuation Route. Water Shortages. Lack of Infill Infrastructure. Building Atop Unmarked Graves. Zoning Restrictions: The special zoning district for Upper Lucas Valley (R-1:B-LV) limits most buildings to a single story. The district was created in order to adhere to the architectural vision and design aesthetic of Joseph Eichler, a renowned architect highly influential in modern architecture. The existing low income senior living homes on Jeanette Prandi Way are likewise single story. If a housing development is allowed near the Juvenile Detention Center site, 7 Mt. Lassen, or Muir Court, they would have to be single story to maintain the character of the surrounding architectural landscape. This would limit the number of units allowed at these sites. Juvenile Detention Center: The concept of constructing multi-family housing at or adjacent to the Detention Center poses challenging logistical and feasibility issues. The County's attempts to reduce juvenile incarceration has been largely successful; however, not to the point where closure of the facility is possible. Marin County's criminal justice program continues to call for incarceration of violent youth offenders, and does not currently have an alternative detention facility. Consequently, any new housing at the Jeanette Prandi location would be adjacent to the Detention Center. It may be quite difficult to convince a developer to invest in a location where part of the "selling pitch" to residents is proximity to a detention center, particularly given that the facilities at Juvenile Hall are in major disrepair. Long History of Racial Parity. Among the factors the County is reviewing in selecting sites is historical discrimination. Our community has no such history and should not, therefore, be a priority for desegregation. Unlike many restrictive covenants in other neighborhoods in Marin County and across California, our CC&Rs have never contained language restricting homeownership based on race, creed, color or religion. Our community celebrates diversity, and we want to make clear we have no history of resisting it. Indeed, it has been reported by original LVHA members that our community attracted a large number of buyers of Asian descent as it was one of the few areas that they were not discriminated from buying into. Locating Housing Near Services and Transportation: The Board of Supervisors affirmed several principles for deciding potential Housing sites and distribution in 12/2021. The potential Housing sites listed for the Lucas Valley communities seem to ignore the mandate for locating housing near services and transportation. The Lucas Valley Community believes the County should be practical and realistic in identifying sites to satisfy the RHNA requirements that do not create a danger to existing communities, will actually serve the goals of the housing mandate, and that show homage to our beautiful and historically significant community. We respectfully request the County to rethink its "rural" VS "urban" housing development plans in light of the State's most recent Urban Housing strategy and funding incentives.	Email (See Email Comments Received.PDF, pp. 173-178)		X		X				X		X	X	X	X		X	
Lucas Valley, Grady Ranch Development	Addendum to LVHA Housing Statement: EIR Traffic Impact Report Needed For Emergency Evacuations on Lucas Valley Road. The recent wildfire emergency evacuation of Upper Lucas Valley in 10/12/21 caused a logjam of traffic on the only road out, the 2-lane Lucas Valley Road. It has belatedly been brought to our attention that the Grady Ranch development, currently in works (224 housing units), also has Lucas Valley Road as their only exit in a wildfire emergency. When the units are complete, they could add another 300 - 500 cars in an emergency (footnote 1 below). Adding even hundreds of more vehicles onto Lucas Valley Road from the 338 new potential housing units projected, could prove disastrous (footnote 2 below). In addition, any traffic study in an EIR report would also have to take into consideration the potential for a significant number of ADU housing units within the corridor. Lucas Valley Road already seems to have all the traffic it can handle during an emergency evacuation. The LVHA would therefore request that a traffic study be done in advance of earmarking any significant number of additional housing units along the Lucas Valley Road corridor.	Email				X				X				X				
Lucas Valley, Mt. Muir Court	Thank you for taking time to read over my thoughts on the new housing developments proposed for Jeanette Prandi Way, Mount Muir Court, Marinwood Plaza and 7 Lassen. As a Marin County native of 58 years and a Lucas valley resident of 26 years, I am surprised that these projects are so close to approval without adequate community outreach and input. There are many items of concern that I don't feel have been adequately answered for me to support these developments. At this time I am strongly opposed to these developments. I am respectfully requesting more time for our community to better understand these proposals and how we can collaboratively help the County solve its low income housing challenges.	Email																
M - 1 St Vincents Drive(St. Vincents)	I am extremely perturbed that plans are being made to build housing in within the wetlands and flood zone contained in the old Silveira ranch and St Vincent's properties. This wetlands will become increasingly important as the sea level rises and flood zones will be even less inhabitable year round. This will leave any housing there soon uninhabitable but some builder richer and some county officials who only went through the motions of actually providing affordable housing. This issue was already explored and sanity prevailed in leaving the wetlands to be wetlands. Any housing, affordable or otherwise, should be built on appropriate land, not a flood zone which will damage any housing built on it.	Email									X						X	
M - 1 St Vincents Drive(St. Vincents)	I am writing to urge you NOT to approve the Marinwood/Lucas Valley sites under consideration to satisfy the Association of Bay Area Governments Regional Housing Needs Allocation Plan. Developments at these six sites (St. Vincent's School, Marinwood Market, 530 Blackstone Drive, 7 Mt. Lassen, 2 Jeannette Prandi Way, and Lucas Valley Road near Terra Linda Ridge) would result in more than 2300 housing units. While I know that some of the proposed housing is intended for teachers and other critical workers and for low income housing, both of which are important and necessary, it seems like too much development for the infrastructure of this small area. Additionally, all of these proposed development sites are within the Miller Creek School District boundaries and the unfunded impact of these developments on the District would be disastrous. Since the District is currently funded using a Basic Aid Model, it gets no per pupil funding. This means that all the additional students these developments generate will not result in additional funding for the District.	Email		X	X					X							X	
M - 1 St Vincents Drive(St. Vincents)	I found the online tools for commenting cumbersome and inscrutable, and much too time consuming to use. So, the following are my comments about specific housing allotment recommendations in Marinwood Lucas Valley. St Vincent's School - 1800: NO Because there is little infrastructure at St. Vincents, including access to schools and public transportation, this is a poor site for development. Certainly not 1800 units which is an entire community. The only housing at St. Vincents should be limited to students (dorms) and staff.	Email		X	X			X		X								
M - 1 St Vincents Drive(St. Vincents)	I hope that the Marinwood Plaza/market site is again under consideration for housing. As you most likely know, some 15 years or so ago, the community shot down an excellent proposal from Bridge Housing. Except for the market, the property remains a derelict eyesore. Many of us in Marinwood would like to see the property improved, including a modest amount of housing development, along with community amenities such as a coffee shop, brew pub, or other gathering place, and other shops such as hair salon, co-working space, etc. It is close to public transportation, schools, and major employers most notably Kaiser. It's a far superior site for development than the St Vincents property which has myriad sea level rise and other environmental challenges, and very little other infrastructure. I hope the property will be on be on tomorrow's meeting agenda.	Email		X							X	X						
M - 1 St Vincents Drive(St. Vincents)	I oppose 98 houses on the 50 acre High School property facing Drake Blvd. in the San Geronimo Valley. .West Marin is maxed out on development because of fire concerns, small roads, septic. The proposed development at the west side of whites hill is the headwaters of the Lagunitas creek which is our coho salmon nursery. It's a floodplain and is unsuitable for development. The infrastructure needed for a development would harm our fragile ecosystem. If Marin County decides to do what the State is demanding, then why not put the entire buildout on the St. Vincents property which is right next to the freeway and could handle the increase in population. We would like to see all the building be for homeless and low income people - like all the people who commute from Vallejo and Richmond to serve us daily because they can not afford to live in our county. Many other properties in Marin would be more suitable.	Email															X	X

Location	Comment	Source	PCL	INF	SER	TRF	PRK	PTR	ACT	NMR	SEA	NAT	CUL	FIR	WAT	HLT	EQT	GDL
M - 1 St Vincents Drive(St. Vincents)	I oppose a housing development the 50 acre High School property facing Drake Blvd. in the San Geronimo Valley. .1. West Marin is maxed out on development because of fire concerns, small roads, septic. 2. The proposed development at the west side of whites hill is the headwaters of the Lagunitas creek which is our coho salmon nursery. It's a floodplain and is unsuitable for development. 3. The infrastructure needed for a development would harm our fragile ecosystem. 4.Building would ruin agricultural, rural beauty which is so precious to the San Geronimo Valley. 5. If Marin County decides to do what the State is demanding, then why not put the entire buildout on the St. Vincents property which is right next to the freeway and could handle the increase in population. We would like to see all the building be for homeless and low income people - like all the people who commute from Vallejo and Richmond to serve us daily because they can not afford to live in our county. Or work with the state to move San Quentin out to a more appropriate place for a prison such as barren land in the dessert, and make a beautiful development on the waterfront right next to shops and the ferry and the Richmond Bridge which would be easy access to transportation and would not overburden Sir Francis Drake which is already far too congested. Many other properties in Marin would be more suitable.	Email										X					X	X
M - 1 St Vincents Drive(St. Vincents)	I see the maps and have concerns that things aren't matching. Then two of the sites are still contaminated from the former cleaners at Marinwood Market Plaza - St. Vincent's and Marinwood Market Plaza. So what happens with the housing planned in these locations?1936 units?	Email														X		
M - 1 St Vincents Drive(St. Vincents)	I think we should spend our time, energy and money on housing the homeless and low income people at the property near St. Vincents just south of Novato. As you may have noticed, people who work in our communities, but can not live here because of the cost, commute from Richmond and Vallejo and we see the traffic jams every day at commute times. I have heard of a toll coming for Hwy 37, making it even more costly for people who can not afford to live here.	Email																X
M - 1 St Vincents Drive(St. Vincents)	I'm taking this opportunity as a resident of Upper Lucas Valley in Marin to voice my views/concerns about the housing sites under consideration in my area: In general: I don't know what constitutes median vs low income, but in general I support add'l housing strategically placed and sensitively designed (to minimize negative impact on the environment and established communities) for essential workers such as school teachers, sheriff, police & fire dept and hospital staffers, many of whom currently commute long distances to work in the areas they serve. I'd like to see new homeowning opportunities (at below market rates) made available to these workers, as building more high-priced rental units serves no one but property owners.Sites under consideration in the Marinwood/Lucas Valley areas: St Vincent's School – 1800; Marinwood Market – 136. These are both logical, less problematic sites for development, as they are walkable to the GG bus stop at/near Miller Creek & Marinwood Aves, with quick, easy access to the 101 fwy. I really hope to see sensitive urban planning on the St. Vincents site, so the beautiful open space currently grazed by cows does not become yet another soulless jungle of buildings standing shoulder to shoulder facing the freeway. Speaking as someone who's actually rooting for the Smart Train to not only survive, but thrive: part of any development of these sites should include a bike path/paths to connect either or both to the Civic Center Smart station. And/or a shuttle bus (it's too long to walk for commuters).530 Blackstone Drive (site of religious house) – 32. I've no knowledge/opinion re: this site. 7 Mt Lassen (site of office park) – 58. 2 Jeannette Prandi Way (site of Juvenile Hall) – 254. My husband & I currently rent an office at 7 Mt. Lassen, so it's news to us that this site's under consideration. It's a beautiful, unique office setting that serves both the Upper and Lower Lucas Valley communities as a place of business to walk to! I'd hate to see that disappear!!! However, I wouldn't be adverse to seeing a portion of the current 7 Mt. Lassen structures converted to work/live spaces, if sensitively planned. Maybe 30%. My comments re: St. Vincents also apply to Jeannette Prandi Way. As long as new development is against the hills with access via Idylberry Rd, away from Lucas Valley Rd, and sensitively planned, I'm not totally adverse to new development. However the # of units proposed is too high!** Lucas Valley Rd/near terra Linda Ridge: 26. I don't know exactly where this is, but in principle I'm against it. **The problem with all new development close to Lucas Valley Rd is not merely degradation of the scenic route of LVR — but more importantly, adding traffic congestion to a wildfire interface area with a single ingress/egress. I'm an LVHA block captain, and was present and part of the fire evacuation on Sept 1st 2021... a learning experience. It's for this reason that I signed the petition against development in Lucas Valley. I believe that the current Northgate Mall could and should be a site for mixed-use development including low-to median income housing, yet is not on this list of proposed sites. It ticks all the boxes for access to transportation, schools, shopping, etc.	Email				X	X		X	X		X		X			X	X
M - 1 St Vincents Drive(St. Vincents)	I'm writing to express concern about the proposal to put 1800 units of new housing at St Vincents in Lucas Valley. This number is incredibly high - it would overwhelm the Miller Creek School district. There are many other sites proposed in Lucas Valley. I'm not saying no to all of them, but this has got to get more reasonable. Please don't destroy what is now a beautiful community. Marinwood is a special place. We can't absorb all this housing - some please, but nowhere close to the number of units proposed.	Email			X					X								
M - 1 St Vincents Drive(St. Vincents)	Public Feedback - Marinwood/St Vincents housing proposal: I was only recently made aware of the current preliminary proposal for housing allocation to the unincorporated areas of marin county. As a current resident who grew up in Marinwood Lucas Valley - left the county - and returned to raise my family here - I cannot more strongly oppose the sheer volume of proposed housing for the Marinwood/Lucas Valley areas. This location (Marinwood/Lucas Valley) is already underserved by commercial services and has a lack of job opportunities. It is a small bedroom community sandwiched between the commercial hubs of San Rafael and Novato. Any significant shopping or professional services require a vehicle trip to either the city of San Rafael or to the city of Novato. The added burden of the new development proposals would grossly increase the negative environmental impacts that the lack of nearby commercial services already causes. Furthermore the 101 interchanges both North and South already can barely handle the traffic that exists. More housing in this area without addressing current school campus, sport field, open space, park and community center availability and other critical services would have a significant negative impact on the community and not balance the Supervisors stated goal of 'equitable distribution' throughout the county. The schools within the Miller Creek School District are also nearly at capacity. Many of the campuses operate with nearly a third of classrooms being in 'portable' classrooms and have had to take over outdoor recreation areas for portable classroom locations. Our youth sports also already operate at a deficit of field/court availability relative to the active youth that participate. I urge the planning department and the board of supervisors to re-evaluate the Marinwood/Lucas Valley area and not look to force nearly 60% of the county's unincorporated housing allotment into our small bedroom community.	Email				X	X					X			X				
M - 1 St Vincents Drive(St. Vincents)	This letter is in regards to the proposed site and distribution of housing in the Lucas Valley/Marinwood area. While I feel this area can support some expansion, the amount proposed by the county is overwhelming. Per the board of supervisors principles, please note my feedback below. 1: Ensure Countywide Distribution: The majority of housing in unincorporated Marin County is being distributed to Marinwood/LUCAS VALLEY. This does not appear to be an equitable distribution and will potentially double the population of this area, affecting all services- sheriff, fire, schools, traffic, etc. Marinwood/LUCAS VALLEY area is being considered for a majority of this housing in unincorporated Marin: St Vincents: 1800 Marinwood Market: 136 Blackstone (site of religious house): 32 Mt Lassen/deli: 58 Jeanette Prandi/Juvi: 254 Lucas Valley Rd/near terra Linda Ridge: 26 Total: 2306. (This could be up to 60% of the total housing for unincorporated Marin) Households in Marinwood/LUCAS VALLEY currently 2412. (This could potentially double our size)	Email		X	X	X				X				X				
M - 1 St Vincents Drive(St. Vincents)	This letter is in regards to the proposed site and distribution of housing in the Lucas Valley/Marinwood area. While I feel this area can support some expansion, the amount proposed by the county is overwhelming. Per the board of supervisors principles, please note my feedback below. 1: Ensure Countywide Distribution: The majority of housing in unincorporated Marin County is being distributed to Marinwood/LUCAS VALLEY. This does not appear to be an equitable distribution and will potentially double the population of this area, affecting all services- sheriff, fire, schools, traffic, etc. Marinwood/LUCAS VALLEY area is being considered for a majority of this housing in unincorporated Marin: St Vincents: 1800 Marinwood Market: 136 Blackstone (site of religious house): 32 Mt Lassen/deli: 58 Jeanette Prandi/Juvi: 254 Lucas Valley Rd/near terra Linda Ridge: 26 Total: 2306. (This could be up to 60% of the total housing for unincorporated Marin) Households in Marinwood/LUCAS VALLEY currently 2412. (This could potentially double our size)	Email		X	X	X				X				X				
M - 1 St Vincents Drive(St. Vincents)	This letter is in regards to the proposed site and distribution of housing in the Lucas Valley/Marinwood area. While I feel this area can support some expansion, the amount proposed by the county is overwhelming. Per the board of supervisors principles, please note my feedback below.3: Encourage Infill and Redevelopment Opportunities; St Vincents is a large undeveloped area that could likely support some housing, but 1800 units does not limit building on open land.	Email								X		X						

Location	Comment	Source	PCL	INF	SER	TRF	PRK	PTR	ACT	NMR	SEA	NAT	CUL	FIR	WAT	HLT	EQT	GDL
M - 1 St Vincents Drive(St. Vincents)	This letter is in regards to the proposed site and distribution of housing in the Lucas Valley/Marinwood area. While I feel this area can support some expansion, the amount proposed by the county is overwhelming. Per the board of supervisors principles, please note my feedback below.3: Encourage Infill and Redevelopment Opportunities; St Vincents is a large undeveloped area that could likely support some housing, but 1800 units does not limit building on open land.	Email								X		X						
M - 1 St Vincents Drive(St. Vincents)	We have seen the preliminary list of potential housing sites for Marin County, including in unincorporated areas such as Marinwood/Lucas Valley, as developed by the ABAG (Regional Housing Needs Allocation Plan), and approved by the California Department of Housing and Community Development. The plan includes 2,412 units within the Lucas Valley / Marinwood area (accounting for 68% of the 3,569 units within unincorporated Marin County). Sites under consideration in the Marinwood / Lucas Valley areas: St Vincent's School - 1,800; Marinwood Market – 136; 530 Blackstone Drive (site of religious house) - 32 7; Mt Lassen (site of office park) – 58; 2 Jeannette Prandi Way (site of Juvenile Hall); 254 LucasValley Rd/near terra Linda Ridge: 26. We are not opposed to some moderate increase of housing units in the area. However, we have some serious concerns regarding these potential sites: (1) The Lucas Valley / Marinwood area currently has less than roughly 1,750 homes, spread across a roughly 3.5 mile valley corridor, almost all of which are single family dwellings, and the overwhelming majority of which are one or two story homes. There are no large multi-unit apartment buildings in this area. The overall magnitude of the increase in units in this area (2,412 units) is disproportionately large compared to the current housing density of the area. The proposed increase would more than double the overall number of housing units in the area. (2) The area to the south and west of St. Vincent's School (east of HWY 101) has been discussed as a potential development site for some time. Although multi-unit housing could easily be developed there, adding 1,800 units would completely overwhelm the property and this very large number of additional units represents an enormous growth for the area, on the same order of units as currently exist in all of Lucas Valley / Marinwood. To fit this large number of units, the development would likely include large three (or more) story structures, which do not currently exist anywhere in this area. (3) The site at 530 Blackstone Drive (current site of religious house) could easily fit a multi-unit development, however 32 units on this site is far too large for the size of the property, which is near the end of a small half-mile residential street, that currently has less than 50 total housing units. (4) The site at 7 Mt. Lassen Drive (currently two relatively small two-story office buildings) is far too small to fit 58 housing units without the new structure extending to three or more stories. (5) The site at 2 Jeannette Prandi Way (south of the Juvenile Hall) is currently an open space area with a loop path that is regularly used by nearby residents (including residents of the nearby senior housing development) as a recreational walking, bike riding, etc. area (and dog walking area). This open space area has been in existence for well over thirty years and is a very popular area regularly used by many residents of the adjoining neighborhoods. A potential development consisting of 254 units on this site would completely eliminate a treasured and much-used open space area and would likely require a multi-story (three or more stories) structure. Very few of the homes in this area of Lucas Valley / Marinwood are more than one story (almost all are one-story Eichler homes). Such a large development is completely out of character with the current land use in this area and should absolutely not be allowed to be developed on this site. (6) These potential new housing units would represent an extremely large additional burden to traffic density in the area. (7) These potential new housing units would overwhelm the current capacity at our three elementary schools and one middle school. (8) These potential new housing units would create a very large additional demand for water resources in the Lucas Valley / Marinwood area which are currently very limited. The simple number (2,412) of potential additional housing units in the Lucas Valley / Marinwood area is much too large and would represent an approximate doubling of the current housing density in the area. Each of the proposed developments presents issues regarding the size of new structures (including constructing multi-story structures in areas where there are currently none), and would present issues concerning current resource capacities (including traffic, schools, and water). Thank you for your consideration of these issues when making decisions regarding potential new housing developments in the Lucas Valley / Marinwood area.	Email			X	X				X		X			X			
Muir Woods Lodge (Tam Valley)	After much thought and consultation with some neighbors, I'd like to submit the motel that is across from the Holiday Inn – the Muir Woods Lodge – as a possible housing site. You may know that the previous motel next door – with the big sign that says "Fireside" was converted to housing some years ago. If the Muir Woods Lodge is similarly converted, it would not create much additional traffic, as the patterns are already established.	Email																X
Nazareth House (San Rafael)	Additionally, there are also at least two other projects (the 670-unit Northgate and 100-unit Nazareth House developments) which are within our school district but not in unincorporated Marin. Likewise, neither of these developments, both within the Miller Creek School District, will generate per pupil funding for either the Miller Creek K-8 schools or the San Rafael High School district. That means that even though there will be many more students to serve, there will be no additional funding with which to do so. Additionally, these developments generate little to no parcel tax money and some are even exempt from the meager development fees which means the District would receive no money at all to build additional classrooms or to hire additional teachers to serve all the additional students that would be generated.	Email			X													
No Location Specified (Countywide)	All should be near public transportation and shopping. Walking is good for all of us	Email						X	X									
No Location Specified (Countywide)	Any & all housing proposed in Marin county should be near public transportation and shopping. Adding additional cars to the area doesn't make environmental sense so low cost housing should be in convenient locations	Email			X			X										
No Location Specified (Countywide)	Any and all housing sites should consider availability of public transportation and availability of services, ie, grocery stores and pharmacies. It makes no sense to put any housing in out of the way sites where more cars are put on the road. Housing closer to hwy 101 is appropriate.	Email			X			X										
No Location Specified (Countywide)	As I am sure, many of our concerns may have already been asked but there is a need better communicate the information to the community. The follow are questions/ concerns: Who performed the study to identify potential areas for the housing sites? What determines the income used for each Housing category (ie local income, county income, housing prices)? How will residence commute from there new homes? Mass/public transportation? Where will retail commerce be located? Will the county exercise Eminent Domain Power? Effect to local taxes, for local bond issues created as a result increased population (Schools, roads, sewers, law enforcement, fire protection …. other county servicers)?	Email		X	X			X						X	X		X	
No Location Specified (Countywide)	I am responding to the request to voice my opinion of where to build 3,569 additional housing units in unincorporated Marin. If this is not the proper email address, please forward the appropriate one to me. My concern is not WHERE to put additional housing, but where WATER resources will come from. We have been under drought and water conservation regulations for more years than not in the past 10 years alone. Why would Marin consider building ANY new homes when there are not enough resources for those that are already here? Also, with the State allowing easy addition of ADUs on existing properties, it appears that some housing needs will be unwittingly filled that way (along with additional strain on resources)	Email				X									X			
No Location Specified (Countywide)	I am urging you to not proceed with the presently proposed Housing Element plans in incorporated Marin County. While affordable housing is a concern, so is sustainability. I do not believe the current plan balances these needs adequately. Please allow time for a more thoughtful discussion with more public engagement before proceeding.	Email										X						
No Location Specified (Countywide)	I am very concerned about the large number of homes that the state is requiring Marin to build, with no local control. We are already short of water. Where do they think we will the supply for more homes. As a minimum any new building should only be done with companion infrastructure improvements to handle it such as water, traffic, local schools, etc. I believe there should be push back to the state legislature regarding push to urbanize many parts of our county without thought or planning for the effects of such building.	Email		X	X	X				X					X			
No Location Specified (Countywide)	I do not think there should be housing put into rural meadows but should concentrate on areas that are near existing commercial or developed areas that are not being used. Why change Marin to be like other congested counties that have houses Everywhere willy-nilly and people have to have cars and use gas to get anywhere they need to go? Marin County has a beautiful and peacefulness in the open meadows and hillsides. Please don't jeopardize the county by putting the housing along open space meadowlands and hillsides.	Email										X						
No Location Specified (Countywide)	I find your proposals rushed and not well thought out. I am in favor of taking a more thoughtful and balanced approach.	Email																

MARIN COUNTY HOUSING ELEMENT: CANDIDATE HOUSING SITES AND SELECTION PROCESS
COMMENTS RECEIVED VIA EMAIL

Location	Comment	Source	PCL	INF	SER	TRF	PRK	PTR	ACT	NMR	SEA	NAT	CUL	FIR	WAT	HLT	EQT	GDL
No Location Specified (Countywide)	I fully support measures to increase housing in Marin County, especially those targeted for low income housing. I reject the disguised racism and NIMBY attitude present among naysayers, even if it were to depress my own home's value. I support both racial and economic diversity as a strength of our community. It's unconscionable that wealthy Marin residents want the best schools, but don't want low paid teachers to be able to afford to also live here. This goes double for housecleaners, yard workers, and other very low wage workers who have to spend a significant portion of their income commuting. Let's stand up to the madness of a vocal few and do the right thing.	Email															X	
No Location Specified (Countywide)	I like how an unelected board (ABAG) comes up with this huge number and threatens the county with a big stick. Never mind the additional water resources that would be needed for all these new residents in a drought prone area.	Email													X			
No Location Specified (Countywide)	Marin Housing authority, It seems like the enthusiasm to push this through the County is ignoring a grievous situation. Already, even with water limitations, the County is poorly prepared to grow without greater water resources. This is truly the 'elephant in the middle of the room'. No expansion on this scale can possible be discussed without responsible delivery of adequate water. Thank you for considering my voice.	Email													X			
No Location Specified (Countywide)	My primary concern is the same one I always have: how will increasing housing affect the environment? A number of sites would require cutting down trees or building close to streams. We need MORE trees, preferably native oaks, to protect soil, reduce moisture loss, & provide shade. Open space is NOT wasted space. Talking about affordable housing sounds good, but I keep seeing huge vanity houses being built. There's a 4,000 ft2 just down the road from me that stands empty most of the time. All that construction required scarce building materials and created lots of air & noise pollution. Is slapping an affordable-housing tag on these projects just another sneaky way for people to invest in real estate? How does packing people into fire-prone areas make sense? What about drought and the impact of more construction & people? Why not buy back or forbid the ownership of 2nd & 3rd homes? Why not build housing in strip malls? Disrespecting the environment is how we got into this mess.	Email										X		X		X	X	
No Location Specified (Countywide)	My view is that the changes proposed will change the character of this lovely region	Email										X						
No Location Specified (Countywide)	The county of Marin has reached peak density due to water and transportation constraints. Minimal new housing should be constructed in Marin County. The housing problem is a statewide problem and it should be addressed at the state level. New cities should be constructed along the Hwy. 5 and 99 corridors near the planned high speed rail lines. The state also needs to build treatment centers for the mentally ill and the drug addicted individuals that are currently living on the streets. These centers can also be placed where land and resources are less expensive. The current uncoordinated county by county plans will only decrease the quality of life and increase expenses for all.	Email			X	X		X		X					X		X	
No Location Specified (Countywide)	We are being asked to find housing numbers 19x what we were asked in the last planning cycle. Why? If this is because ABAG is, once again trying to tie Marin housing numbers to SF through their "sphere of influence" concept, this has already been disproven, since Marin is not a bedroom community to SF. ABAG needs to understand that they cannot just wave their magic wand, and buildable lots appear! Affordable Housing needs are real, and Marin has been a very expensive place to live, both in housing costs and in cost of food, gas and everything else, so we are not a very affordable place to live, even once housed. ites with sea level rise issues should not be considered for new housing. Period. Building housing for the disadvantaged in these areas is not social justice, or even good planning. Parking on site is a must in Marin, regardless of any loopholes in SB9. Especially on the hills, where the streets are sub-standard, parking on the streets has already created impossible access for fire and other emergency vehicles, or even 2-way traffic. This has been caused by the County neglecting to demand the roads be improved before development went in. These are death traps in the event of the fire we know will come some day! Planning has allowed development to continue on substandard roads, particularly on hills. This poor planning has created fire traps throughout the county that people will not be able to evacuate from. These sites should also not be further developed, especially for those in need, without adding the infrastructure that will insure the safety of the residents, ie adequate roads that can handle an evacuation. Other infrastructure needs to be updated to handle increased demands, such as sewers, to meet the unplanned expansions mandated by SB (How will we meet these and who pays for these? While we are planning for housing for those who are not already residents, how are we planning to meet the needs of the residents? Re: sea level rise impacting existing housing and major roads, and fire. While we are redesigning these we may have opportunities to find new housing sites. I hear the Strawberry Seminary has sold its property. There is a vast opportunity for any kind of housing to go there. This is well above sea level and wide open. I am wondering how many affordable units are going in there, where there is so much space to build? The old San Geronimo Golf course is another site that is wide open, though further from town Cost of land is higher here than most other places, plus the cost of building materials is high. Marin has World Class scenery that is enjoyed by everyone in the Bay Area, and beyond. We have a responsibility to our environment that other counties do not. We also have a high amount of traffic going to west Marin, and Muir Woods is the most visited National Park. Neighborhoods where traffic is already gridlocking poses problems for emergency vehicles, and should be carefully evaluated before increasing density. I do not believe we can ever build enough Affordable Housing to fill the demand of everyone who wants to live here. The main cause of housing crises is that wages have not kept up with housing costs, effectively keeping out anyone who is not wealthy. This disproportionately locks out people of color. Since Marin is effectively "built out", we should be looking at infill housing San Rafael's Canal area was built a long time ago with lightly built apartments. These nave been heavily used and probably are about to need replacing. This whole area probably need to be redeveloped with plenty of opportunity for affordable housing. With so many people working from home, we have the opportunity to repurpose office buildings Same with shopping centers. Novato has many that could be redone. Since state monies that pay for Affordable Housing, anyone from anywhere in the state is eligible for housing built here, as I have heard. We have Buck $$. Marin should be building housing for teachers, healthcare workers, fire fighters and police that can be designated for members of our own community. Remodeling existing apartments or turning existing into apartments, instead of always building new. I am all for more affordable housing. I was a single mom of 2 in Marin, for 20+ years and I know first hand how difficult it is to survive here if you are low income. It just is not set up for that, and haas continued to get more expensive. I never saw a dime of assistance from Buck, so I very much doubt it is being used to help the poor, as it was intended. We should use this to help, as outlined above. Ask the State for some of its surplus $$ to reestablish the school bus system. Ditto for low lying roads/utilities, etc. Almost 30% of traffic AM/PM is from parents driving their kids to/from school Increase access to affordable child care along with housing. I would welcome an opportunity to work on a brainstorming committee to come up with new housing strategies system.	Email		X		X	X				X	X		X	X		X	
No Location Specified (Countywide)	We are being asked to find housing numbers 19x what we were asked in the last planning cycle. Why? If this is because ABAG is, once again trying to tie Marin housing numbers to SF through their "sphere of influence" concept, this has already been disproven, since Marin is not a bedroom community to SF. ABAG needs to understand that they cannot just wave their magic wand, and buildable lots appear!	Email																
No Location Specified (Countywide)	We should not be approving any more new developments without increasing our water supply.	Email													X			
No Location Specified (East Marin)	Please keep the housing developments in east Marin as our beloved former politicians planned in the early 1960's as detailed in the documentary "Rebels with a Cause".	Email										X						
No Location Specified (San Geronimo and Nicasio)	Dear Board of Supervisors, I am writing to thank you and the County staff for the outstanding work you have been doing on the new Housing Element for Marin County. I especially appreciate the community education and outreach by the County to actively engage residents during these past few months. The workshops on the Housing Element and the Balancing Act tool offered important information on the unmet need for affordable housing and also the criteria that could to be used as guides in the decision-making process. I also want to thank Leelee Thomas and the entire Community Development Agency staff for the virtual workshop on February 16th for unincorporated West Marin. More than 100 people attended, many with purposeful, well-informed questions. Leelee and staff responded to all of the questions in a knowledgeable, meaningful and insightful manner. In addition to housing sites, It was good to hear that County staff are working to try and find solutions to some of the most vexing issues that impede and discourage the creation of affordable homes: septic issues, waste treatment and grey water systems, and building code and zoning restrictions. I very much appreciate your dedication and support of affordable housing in Marin. We all have a lot of work to do. Attached are my ideas about possible sites for affordable housing sites in the San Geronimo Valley and Nicasio. (Note: attachment apparently not included)	Email															X	

MARIN COUNTY HOUSING ELEMENT: CANDIDATE HOUSING SITES AND SELECTION PROCESS
COMMENTS RECEIVED VIA EMAIL

Location	Comment	Source	PCL	INF	SER	TRF	PRK	PTR	ACT	NMR	SEA	NAT	CUL	FIR	WAT	HLT	EQT	GDL
No Location Specified (San Geronimo Valley?)	Increasing the potential for 200+ more cars getting through the SFD corridor during rush hour? Traffic is already a nightmare morning and night. Adding houses to a community struggling to maintain homeowners insurance due to wildfire vulnerability? This is really poor thinking and poor planning. I support seeking SOME alternative Valley sites to meet our affordable housing obligations but there are possibilities along the 101 corridor that make much more sense. Please think forward instead of short sightedly.	Email				X								X				
No Location Specified (West Marin)	I agree with and adopt as my own the comments submitted by the Environmental Action Committee of West Marin (EAC), and request that you add my name in support of EAC's position. And additionally, and by all means, Marin County MUST maintain the zoning (A-60) and all other policies designed to protect and enhance agriculture in West Marin. (Note: unable to identify EAC comments which are referred to.)	Email										X						
No Location Specified (West Marin)	I am extremely concerned about more housing going up in West Marin due to fire danger and the already impossible likelihood of getting out of Marin from West Marin due to the lack of roads to get out. How can more housing be considered when there are only a couple ways out and if traffic in Fairfax is bottled up and the ONLY way out is going east then valley residents are screwed. Housing should only be considered in areas nearest the freeways. The golf course should only be for open space and recreation. Fire danger is a serious threat.	Email				X						X		X				
No Location Specified (West Marin)	In West Marin we are on septic systems. It is horrendously expensive to get anything done here., costing up to $ 100,000 easily for a simple system.Then the County is imposing annual extra fees for people who have non standard systems of any kind. It makes this unfeasible for all but the most wealthy. I and many of my neighbors would be amenable to putting an ADU on our property BUT for the septic issues. There are alternatives - electric toilets, or other things that could be researched. Also, the County must come up with an affordable septic pricing. Plus, the contractors have no incentive to keep their costs in line, even with their proposals. I have heard time and again, how Questa got a bid, must have been the lowest bid, then they went over budget, (by $15, 000 or $ 20,000) and to get the house signed off, approved, and be able to move in, the homeowner paid the extortion, I mean, bill. The County could at least provide a service where homeowners could put their comments in about septic contractors for prospective septic owners to see. Thanks for listening.	Email													X			
No Location Specified (West Marin)	The consideration of this site (275 Olive Avenue) raises a concern that other similarly inappropriate sites may also be up for consideration in other parts of Marin. Would it be possible to get a list of any sites that are within 500 feet of a wetland? I studied wetland habitat restoration planning in graduate school, and was under the impression that CEQA/CWA sect 404 prevented projects from being built on top of or close to wetlands.	Email										X						
Northgate Development (San Rafael)	Additionally, there are also at least two other projects (the 670-unit Northgate and 100-unit Nazareth House developments) which are within our school district but not in unincorporated Marin. Likewise, neither of these developments, both within the Miller Creek School District, will generate per pupil funding for either the Miller Creek K-8 schools or the San Rafael High School district. That means that even though there will be many more students to serve, there will be no additional funding with which to do so. Additionally, these developments generate little to no parcel tax money and some are even exempt from the meager development fees which means the District would receive no money at all to build additional classrooms or to hire additional teachers to serve all the additional students that would be generated.	Email			X													
Novato, Atherton Corridor	Hello. Thank you for the information and materials regarding the Housing Element on the website. I have reviewed all of the materials and have the following questions the answers to which will help me and others comment and provide input in a more informed way. Because of the 1,000 character limit, this is the 1st of 3 emails with 9 total questions. The Draft Candidate Sites Inventory charts you have provided do not break-out extremely low-, very low-, and low-income units. The Housing Element Site Inventory Guidebook under Government Code Section 65583.2 (the "Guidebook") seems to require this, and Marin County's FAQ 15 breaks down the 3,569 total into those 3 categories plus moderate and above moderate. Can you please provide that more defined breakdown of all 5 categories by site? 1. It would be very helpful to have a chart for the Draft Candidate Sites Inventory that lists the units under each of the four scenarios. Is that something you have? Can you please provide it? 2. Under Part A, Step 3 please provide the infrastructure availability or plans for the Atherton Corridor sites. 3. Under Part A, Step 6 please provide the factors considered to accommodate low and very low-income housing for all of the sites. 4. Under Part B, for the Atherton Corridor sites, please provide the evidence that the site is realistic and feasible for lower income housing. 5. Is there a master plan for all of the low-income housing, up to 516 units, for the Atherton Corridor? Does any plan consider sidewalks, traffic lights, parking spaces and public transit? How many buildings and floors on each site are envisioned? 6. Under Part C, the capacity analysis, and in particular Step 2, what were the factors to calculate the realistic capacity of the Atherton Corridor sites including redevelopment of the non-vacant sites? 7. Under Part D, why are the non-vacant sites in the Atherton Corridor considered "obsolete" or "substandard" or otherwise meet the required criteria? 8. Under Part D, Step 3A, what is the basis for finding that the current residential use for the Atherton Corridor sites is unlikely to be continued? I would appreciate your response to my 9 questions in advance of the planned call for the Novato Unincorporated area on February 17.	Email	X	X													X	
Novato, Atherton Corridor	How would you feel if the County identified your home as the possible site for rezoning to accommodate high-density housing but neglected to notify you??? And then justified its inaction as inconsequential because the properties are only under preliminary consideration. That's what happened in the Community Development Agency's Feb. 17 presentation. I call it arrogant, insensitive, high-handed and totally inappropriate. Furthermore, the process of identifying these properties is opaque at best. It is irresponsible to proceed while disregarding the infrastructure necessary to support new homes, particularly in our drought-stressed, fire-endangered landscape. It's not the kind of government that respects its citizens. I am particularly troubled that the planning for the Atherton unincorporated areas ignores the Fireman's Fund 1000-home development in Novato less than a mile away. Dumping 1400 homes into this concentrated area spells disaster and will overwhelm the San Marin-Atherton interchange.* The "Guiding Principles" you adopted in December include "environmental hazards," but they recklessly disregard the practicalities of building on these sites and the adverse impact on the local environment, It's time to go back to the drawing boards and this time develop a reality-based plan that honors your constituents. *Construction of 101 in the Novato Narrows has taken 20+ years! Nothing should proceed until CalTrans is on board with a plan and dollars committed!	Email	X	X						X		X		X				
Novato, Unincorporated	We live in unincorporated Novato and the consensus of my neighborhood is that we do not wish to have our area re-zoned to accommodate low-income housing. What's unique about our area is that we still have some room to support the local wildlife and insects. Since moving here in 2014, we've witnessed a decline in the bee, bumblebee, and butterfly populations. The Monarchs will soon be gone too due to dwindling food resources. They are key to the health of our ecosystem, and every time a property is developed for housing, the plants needed to support these creatures are destroyed. Fencing also hurts the trails and pathways necessary for the animals to get much-needed food and water. We do not want you re-zoning anything. We want to keep our neighborhoods as they are. We already struggle with water issues. Please do not make our areas more accessible for development. We do not want what little beauty is left here destroyed.	Email										X			X			

Location	Comment	Source	PCL	INF	SER	TRF	PRK	PTR	ACT	NMR	SEA	NAT	CUL	FIR	WAT	HLT	EQT	GDL
O - 217 Shoreline Highway (Tamalpais)	(Comment edited for length) Sustainable TamAlmonte has the following comments and recommendations regarding the merits of the above referenced Tam Valley, Almonte, and Manzanita Candidate Housing Sites listed in the 2023-2031 Housing Element DRAFT Candidate Housing Sites List. Due to the unique characteristics of the area, encouraging residential development, especially high-density development, at the above referenced Sites would increase the risk of undue harm to the environment and undue hardship, illness, injury and/or death to the current and future residents. The Tam Valley, Almonte, and Manzanita commercial lowlands, in which the above referenced sites are located, experience the most number of environmental constraints and hazards of any area in Unincorporated Marin. Both the Marin Countywide Plan's EIR and the 2012 Housing Element's SEIR demonstrate that development at these sites would exacerbate the existing dangerous conditions and add new significant adverse environmental impacts (which) magnifies the probability that a tragedy would ensue and the multiple mitigations that a developer would need to fulfill would cause development costs to soar. These factors make the sites unsuitable for affordable housing. The only acceptable course of action is to eliminate the sites from the inventory. Below is a list of the unique natural features, hazards, and limited resources in the Tam Valley, Almonte, and Manzanita lowlands that constrain development and population growth and substantiate our argument. For a quick overview of these constraints, please view the attached table. I. Dangerous Traffic with Unacceptable Level Of Service – LOS "F" Of Local Roadways:. II. Flooding, 100 Year Floodplain, Impending Sea Level Rise III. Filled Marsh Areas With High Seismic Activity, Liquefaction, Subsidence and Mud Displacement. IV. Air Quality & Noise: Increased Risk of Residents Developing Serious Illness Due to Living Near Major Roadways. V. Hazardous Materials: For additional information regarding potential health impacts to workers and future residents who may be exposed to hazardous soil conditions, related to past uses, in Tam Junction and Manzanita, please follow the below link to read the comment letter by Technical Expert Matt Hagemann. VI. Endangered Special Status Species. VII. Insufficient Services & Public Transit. VIII. Historic Wetlands and Baylands Corridor. IX. Historic Marshland That Could Be Restored. 160 Shoreline Hwy and 260 Redwood Hwy Frontage Rd. are historic marshland. X. High Density Development Is Not Consistent With the Traditional Character Of The Local Semi-Rural Communities. Conclusion: The County now has sufficient information to understand that the proposed Tam Valley, Almonte, and Manzanita Sites are inappropriate for inclusion in the 2023-2031 Housing Element Candidate Housing Sites Inventory. Not only would construction of housing on these sites exacerbate the already existing problems but doing so when the County admits in the Marin Countywide Plan EIR and 2012 Housing Element's FSEIR that significant adverse unavoidable impacts would result from such construction defies logic. Moreover, there can be no benefit that would override the impacts of environmental harm and severe illness, injury or loss of life from building on the Tam Valley, Almonte, and Manzanita Candidate Housing Sites, which are laden with environmental constraints and dangerous hazards. The best course of action would be for the County to revise the list to reflect the current problems with traffic, seismic activity, hazardous soil conditions, air and noise pollution, water supply, flooding, and impending sea level rise and to find that no new residential development in the Tam Junction & Manzanita areas is appropriate. Such action would be consistent with the Board of Supervisors' sensible decisions.	Email (See Email Comments Received.PDF, pp. 123-151)	X			X					X	X		X			X	
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O - 217 Shoreline Highway (Tamalpais)	As a concerned Mill Valley resident, I am writing to endorse TamAlmonte's letter to you re. the merits of Tam Valley, Almonte, & Manzanita Draft Candidate Housing Sites. Please think very carefully about sites, due to concerns about flooding, traffic and at times extreme fore danger with needed evacuation routes.	Email				X					X			X				
O - 217 Shoreline Highway (Tamalpais)	ATTACHMENT from Tam Design Review Board: Suggested Additional Policies to be Included in the Housing Element: 1. Wildfire Risk: Use mathematical modeling to investigate and predict wildfire risk. Prohibit the building of housing (even ADUs) in fire critical areas. 2. Flood Risk: Prohibit new housing in areas at risk of flooding from storm surge or sea level rise. 3. Bothin Marsh: Require all new development adjacent to Bothin Marsh to supplement and follow the policies that are designed to preserve the marsh. Given the County's recent efforts to restore and preserve the marsh, it makes no sense to select a site adjacent to the marsh for any form of dense development. 4. Evacuations: Require that new housing development along Shoreline Highway trigger a study and redesign of the traffic patterns to ensure that any new housing development in that area will not worsen traffic or increase the threat to life safety during an evacuation. Any assessment of traffic impacts of emergency evacuation should include new housing developments in the City of Mill Valley, as Shoreline Highway is the only exit should East Blithedale become blocked. 5. Short Term Rentals: Eliminate short-term rentals completely, or allow only on-site, owner-occupied properties to have short-term rentals. If someone does not live on-site, then the property is arguably an investment property only, and any claim of the need for that short-term rental income can be disregarded. This would enable ADUs to be counted toward the Housing Element numbers (see item #10). 6. Vacancies: Create a County mandated vacancy tax (as San Francisco is presently considering) to create disincentives for leaving housing units empty. Exemptions could be made for work from home or dwellings under a certain square footage if the homeowner works from home or needs the space for their own dwelling use. This has been documented to establish new housing units and therefore could be counted toward the housing numbers. 7. Speculative Investment: Eliminate corporate ownership of housing of up to 4 units. This will stop speculative over-bidding of properties (which drives up housing costs) and land banking (which is performed to drive up the value for the investors.) This is crucial for market rate units that do not have controls over ownership. If dwelling units are constructed and snatched up by corporate investors, the goal of increasing availability will not be achieved. If the housing crisis is still occurring after another eight years, the next round of RHNA numbers will be even higher, and even more density will be demanded. 8. Promote Affordability: Require that all lot splits and ADUs rent at affordable rates. This would enable ADUs to be counted toward the Housing Element numbers that are required for affordable units, which are the most difficult to achieve (see item #10). The Planning Department should not look at undersized parcels as a hardship that allows for an exemption to exceed the FAR. Instead, it should be taken as a limitation on the lot that will provide a smaller home, which will ultimately result in a diverse range of housing options and levels of affordability. 9. Conversions: Provide incentives to preserve the existing stock of affordable housing and/or promote the conversion of existing market rate housing to affordable housing. Tam Valley in particular has a large number of rental units which have traditionally been at the affordable end of the rental spectrum, and could readily be maintained as such with the necessary incentives. 10. Alternative Measures: Follow the Housing Element guidelines to promote and locate alternative housing sites as per recommended policies #5, 8, and 9 above. These guidelines state that acceptable dwelling unit numbers can be counted through "the availability of ADUs and JADUs for occupancy, rather than used as offices or guest houses." (p. 30) In addition: "Alternative adequate sites: Under limited circumstances, a local government may credit up to 25 percent of their adequate sites requirement per income category through existing units that will be: substantially rehabilitated in a multifamily rental or ownership housing complex of three or more units that are converted from non-affordable to affordable rental; preserved at levels affordable to low – or very low – income households, where the local government has provided those units with committed assistance." (p. 30)	Email																
O - 217 Shoreline Highway (Tamalpais)	I am in complete support of all the points made in Sustainable Tam Almonte letter of 2/24/22. Building in the proposed area is ill advised, and appears to be illegal.	Email								X	X							
O - 217 Shoreline Highway (Tamalpais)	I am writing to endorse the attached letter from Sustainable TamAlmonte to the Marin County Board of Supervisors and Planning Commission regarding the merits of the proposed Tam Valley, Almonte, and Manzanita Candidate Housing Sites listed in the 2023-2031 Marin County Housing Element DRAFT Candidate Housing Sites List. The need for housing our homeless is desperate but building residential space at Tam Junction is just NOT logical. The idea of building along Shoreling/ Highway 1 is very questionable. It is already a populated area with minimal sidewalks and access to needed resources. Thank you for your consideration of the attached letter	Email	X	X	X	X		X		X	X	X	X	X	X	X		

MARIN COUNTY HOUSING ELEMENT: CANDIDATE HOUSING SITES AND SELECTION PROCESS
COMMENTS RECEIVED VIA EMAIL

Location	Comment	Source	PCL	INF	SER	TRF	PRK	PTR	ACT	NMR	SEA	NAT	CUL	FIR	WAT	HLT	EQT	GDL
O - 217 Shoreline Highway (Tamalpais)	We are writing in regard to the sites chosen for possible inclusion into county plans for housing in the Almonte/Tam Valley area of the county. Of the eight sites mentioned in your Balancing Act scenario, five are in a serious flood zone and one is located, not on, but in Richardson's Bay. Your commentary regarding the avoidance of environmental hazards has been completely ignored by whatever staff was used to choose these sites. The properties in the flood zone are 160 Shoreline, assessor's parcel # 052-041-27, 217 Shoreline, 223 Shoreline, and 204 Flamingo Rd. he site which is actually in the bay is 260 Redwood Hwy. Oddly enough, there is one property across the road from 160 Shoreline which is on solid ground. That would be the Muir Woods Lodge, a motel which actually has some open space which could be used for more housing. Why was this property ignored when lesser properties were chosen? Considering that we are familiar with the sites in the Almonte/Tam Valley area but not the rest of the county, it seems very strange that your staff has chosen properties which flood now and will continue to flood even more in the future. We wonder about your motivation in focusing on dangerous and inappropriate land. We also wonder why your staff has chosen properties which are pretty much lumped together in the same area which will further exacerbate the level F traffic problems which occur for us every day. If these sites were chosen to be close to public transportation, we would remind you that there is no viable public transportation in our area. So we would be looking forward to much more daily auto traffic. We are extremely disappointed in the Balancing Act which appears to be a distraction and of no practical value. We wonder how much time and money was wasted on promoting this ridiculous game. We also wonder how many sites in the rest of the county are totally inappropriate but are being promoted as a way to choose our fate which, as you know, is not the case. Surely, the Board of Supervisors can do better than promoting this silly distraction rather than facing what is a serious problem for the future well being of Marin County.	Email				X		X			X							
O - 217 Shoreline Highway (Tamalpais)	We oppose new housing in the areas mentioned in Tam Junction due to flooding and traffic and possible fires, can't get out of here now. Tell Scott Wiener and his friends to move on.	Email				X					X			X				
O - 217 Shoreline Highway (Tamalpais)	Yesterday afternoon, I had the pleasure of speaking with Ms. Clark about the wisdom (actually, the lack of it) in the choice of potential sites around Tam Junction. Last night, I participated in the "roadshow" and, as a result, I am asking for your help in following up on one matter. During the presentation by Jose Rodriguez, he mentioned that one of the "Guiding Principles" for the BOS is the consideration of "environmental hazards". It doesn't take long to recognize the hazards of sea level rise, a long history of flooding and traffic in our neighborhood, among others. But, in addition, Mr. Rodriguez made an interesting rejoinder to a question about whether certain sites can be included in this study if such sites have been previously reviewed and rejected. He was not too clear but he suggested that the State of California has some "requirements" if a previously rejected site is again brought up for analysis. I asked him to specify (1) which of the four Tam Valley sites have already been considered and rejected, and (2) what are the state's requirements (if any)--that are different or additional--that would apply to such sites. He did not have the information available to answer either question and it didn't appear to me that there would be much of an effort to research those questions and disseminate the answers. Hence, this email. Do you know the answers? If not, would you please put in motion an effort to discover the answers? It may not be dispositive, but then again, it may be important.	Email				X					X	X						
P - 4900 Sir Francis Drake Boulevard (San Geronimo Valley)	(Comment edited for length) Please find attached the San Geronimo Valley Planning Group's response to the proposed Housing Element update. Background: The San Geronimo Valley Planning Group was formed in 1972 to help elect Gary Giacomini to the Board of Supervisors in order to gain the critical third vote necessary to kill the 1961 Countywide Master Plan, which had envisioned 5,000 new homes and 20,000 additional residents for the San Geronimo Valley alone. While the plan was updated in 1982 and 1997, its central premise has never changed: preserving our Valley's rural character and protecting our natural environment. This commitment - along with that of many other community members - also helped permanently preserve more than 2,300 acres of open space in our beloved Valley. We have been trying to apprehend the efforts of Marin County to meet the state- mandated "housing elements" through the rezoning of existing parcels. We are very concerned that few Valley residents are aware of the potential impact of this housing mandate on our community and that the Planning Group was not included in the process from the beginning. Apparently, pressure from the State has made it a top- down County effort. The Planning Group adamantly opposes the proposed, potential locations within our community identified below. High school property - We are alarmed by Candidate Housing Site P, the proposal to build 98 above-moderate-income units through rezoning the high school property next to the Ottolini/Flanders' Ranch at the bottom of White's Hill on Sir Francis Drake Blvd. Our Community Plan clearly spells out that the use of this property should remain as agriculture or open space; the high school district agreed. Our reasons are numerous. 1. It would be a visual blight, destroying not only the aesthetics of the entrance to our Valley but also jamming suburbia into the inland rural corridor. 2. It would be a dangerous location, creating a separate enclave with an entrance off a very busy highway, and removing one of the few places where traffic can safely pass slower traffic. 3. Because this property is not within the boundaries of any of our four villages, it would destroy the essence of our Valley's character, creating, in essence, a new, completely separate village of above market-rate houses. Moreover, there is no sewage or water infrastructure at this location. 4. It is an environmentally poor choice, being a wetland area, a swamp in the winter, and within the headwaters of the Lagunitas Creek watershed. Former golf course club house property. Candidate Housing Site R-1. This open space, referred to as the Commons, must remain open space and not also become a "new village" location. In addition to being the likely site for a new firehouse, this is an essential area for community gatherings, and provides needed parking for and access to Roy's Redwoods, Maurice Thorner Open Preserve, and the two, newly conservation easement-protected meadow parcels (former front and back nine). The Planning Group does favor affordable housing in the Valley. We want our residents and their children to be able to afford to remain in our community and to maintain our diverse population. But the current plan seems to be solely a County "numbers game," meeting only the requirements of the State for 3,569 units in unincorporated Marin. The parcels in the Valley are identified for families earning more than $132,000 annually. For an individual, this would be the equivalent of $62.50 an hour. The Valley is a rural community. The minimum wage in California is $14 an hour. Anyone who works a full- time job should be able to afford decent housing. This plan does not provide that. The County must focus on the real need for affordable housing, with more emphasis and incentive on legalizing existing units and making it easier to create second units, ADUs and JDUs. A stronger effort is needed by the County to find appropriate parcels within our existing villages. Potentially, this might include the current location of the County fire department, which, if/when it's vacated, could be an excellent location for affordable multi-family housing. There are others. A time constraint shouldn't be the deciding factor in zoning parcels for housing. There has to be more thought put into this and community involvement shouldn't be limited to a flawed survey. We request the County hold an in-person meeting for the community as soon as possible, preferably in the multi-purpose room at Lagunitas School. Additionally, the Planning Group would like to work with you to find a way to provide more affordable housing units within our community while continuing to maintain and protect the rural character and natural resources that make our Valley such an attractive place to live and raise a family.	Email (See Email Comments Received.PDF, pp. 234-236)			X	X	X			X		X					X	
P - 4900 Sir Francis Drake Boulevard (San Geronimo Valley)	1: can we use the Lagunitas school parcel that is before the Spirit Rock parcel? 2: If Spirit Rock is built on can it be hidden from road? 3: The visual view when you enter the Valley is gorgeous and should be maintained. 4: Lagunitas school campus has lots of unused space.	Email										X						X
P - 4900 Sir Francis Drake Boulevard (San Geronimo Valley)	98 houses on the San Geronimo Valley floor is a terrible idea. It would ruin the beauty of the valley which Valley residents have worked so hard over the years to preserve.Please help us … we would be most grateful if you could find other sites for these needed homes. Grateful for your attention to this.	Email								X		X						

MARIN COUNTY HOUSING ELEMENT: CANDIDATE HOUSING SITES AND SELECTION PROCESS
COMMENTS RECEIVED VIA EMAIL

Location	Comment	Source	PCL	INF	SER	TRF	PRK	PTR	ACT	NMR	SEA	NAT	CUL	FIR	WAT	HLT	EQT	GDL
P - 4900 Sir Francis Drake Boulevard (San Geronimo Valley)	Already leaving here is problematic early in the morning and many folks work and go to school over the hill and have to go then. You would be adding probably 200 or so cars to the problem for starters. As it is I no longer go to Point Reyes on the weekends because its an extremely busy place full of tourists and the locals cant park and get to services. Dennis, I have written to you before regarding the San Geronimo Valley Golf Course and you can see now that what was once a beautiful sward of land full of animals and birds and yes golfers is now a sea of weeds and fallen trees. And yes, people walk there on the paths and I guess through the tick invested grasses as well. And now you want to put up 98 (!) houses and destroy another piece of the Valley? And what about fire and earthquake considerations. If that corridor gets blocked in an emergency we would all try to get out through Lucas Valley or perhaps Highway One but regardless its scary to think of those situations. And I was here when we fought to keep that high school and all the other developments a NO GO. Successfully might I add and I believe the plan states that land was to stay agricultural. And how are you going to get all those folks home insurance? I already know people who have been denied coverage here and several of those companies I believe want to leave California altogether. Surely you can find another spot to meet whatever criteria is mandated some place else. I dont know if you even bother to read these letters but I do want to go on record objecting wholeheartedly to this.	Email				X						X		X				
P - 4900 Sir Francis Drake Boulevard (San Geronimo Valley)	Dear Mr. Rodini please do your best to represent the better interest of all Valley residents and don't let 98 new houses be Built-in the area East of Woodacre along San Francisco Drake. The San Geronimo Valley has one road in-and-out and Our septic systems and fire protection issues are at stake! Please say no!	Email				X								X	X			
P - 4900 Sir Francis Drake Boulevard (San Geronimo Valley)	Hello Dennis, I am writing as a long term resident in Woodacre with some concern regarding the 50 acre parcel alongside SFD Blvd and the Flanders ranch property. Please include all San Geronimo residents in any planning that might go forward on this horrendous possibility for 98 homes. We are already struggling with water issues, fire issues, septic issues, road access in emergencies, current Fairfax traffic jams. We already have a valley floor jammed with County infrastructure - water dept, fire dept, PGE substation, noise and lights all times of day and night. I certainly hope this possibility will become part of many public forums on your agenda for this small and fragile valley. Since the last fire on White's Hill, nothing has been done to remove the battery box from the long-broken highway sign which may have sparked that fire. I think, in speaking to my neighbors, the SGV feels a bit neglected by your office and I sincerely hope that can be rectified.	Email				X				X				X	X			
P - 4900 Sir Francis Drake Boulevard (San Geronimo Valley)	I am a homeowner in Woodacre since 1972. I am of the opinion that there are some places that shouldn't be developed. I include all of western Marin in that category, but for the moment I will comment on the proposed development of 98 homes just west of White Hill on Sir Francis Drake Blvd. Entering the valley, one's first impression is the beautiful rural landscape that is becoming rare in California. That experience would be negatively impacted by any development in that area. 98 Homes would mean around 200 automobiles adding to the congestion in Fairfax and San Anselmo and create a great deal more air pollution than already exists. That area is not only a seasonal wetland, but is in the headwaters of the Lagunitas Creek Watershed. Construction and habitation of that area would cause irreparable harm to wildlife, including endangered salmonids and many other species. I support development along the 101 corridor.	Email				X				X		X		X	X			
P - 4900 Sir Francis Drake Boulevard (San Geronimo Valley)	I am a resident and homeowner in Forest Knolls, where I live with my husband and 5 year old. I'm responding to signs I saw posted today along SFD near Dickson Ranch, in regard to the building of 98 homes on that property. I have searched online and cannot find any more information about this proposal. I would like to add my comment that you please proceed very cautiously-- while I really recognize the need for more housing and more affordable housing in Marin, I have a couple of big concerns-- environmental impact (including air quality, native species habitat preservation and restoration, and light pollution. I also have some concern about SFD as the only way into and out of the valley, in case of emergency (and, just in terms of general traffic congestion, and air pollution). So my comment is to please very carefully consider these matters before proceeding. Thank you!	Email				X						X		X		X		
P - 4900 Sir Francis Drake Boulevard (San Geronimo Valley)	I am dead set against the proposal to develop 98 new houses on the 50 acre High School property. Such a large development is exactly the kind of change the valley has fought against for decades. Such a large development would change the Valley's pastoral character enormously and negatively. I believe the Valley's population stands around 3,500. If 4 people were to live in each house of such a new village, the valley's population would increase over 10% overnight. I would support fewer than half such units of low-income housing if they were located in dispersed fashion, and wouldn't have such a negative aesthetic consequences.	Email								X		X					X	
P - 4900 Sir Francis Drake Boulevard (San Geronimo Valley)	I believe West Marin has reached its carrying capacity for new homes, especially in regards to water, roads, septic and fire safety. Are we going for maximum buildout? What happens after we add 3500 homes the State of California tells we have to do? What happens in 2031 when they say we have to do it again? I watched the zoom meeting with Leelee Thomas on February 16, and she said it's either the carrot or the stick. I did not see any carrots in the equation, only threats. The proposed 98 houses in the heart of the San Geronimo Valley is an ill conceived proposal. It does not take into consideration that the plot of land is the headwaters of the Lagunitas Creek which is a coho salmon nursery. It's a flood plain when we get substantial rain - if you have ever driven by in a downpour, the entire area is a web of small streams before it gets to the main stream channel about 500 feet from there. I believe the infrastructure needed for those houses would not only be an eyesore, but also a detriment to our fragile ecosystem.	Email		X		X				X	X	X		**X**	**X**			
P - 4900 Sir Francis Drake Boulevard (San Geronimo Valley)	I could not access the Balancing Site work area so I am submitting these comments here. SGV is am amazing place to be due to low development. I have had the benefit of living here 25 years. What is being proposed in both of the areas of the School property and at the Gold Course are for higher end homes. Higher end homes are not a help for our community. We need homes for families with kids, We need Senior housing. We don't need another 127 above moderate income homes. Have some vision. Create a place with a grocery store, deli, and place for people to meet. Create Senior housing. Have ability to share vehicles. This area could become a hub for our community to use and support. It is also a sensitive environmental area. It used to be where water would spread out when it rained and slowly sink into the ground providing water all year round for the fish. More concrete and asphalt = more runoff. This vision of 98 separate high end homes here is not fitting to the rural area of our valley. It is just going to bring in more people who want a rural lifestyle from other areas and NOT give our locals homes. Every day, people, and families are looking for homes. Renters are being pushed out. It is unaffordable to live here. Solve the problem we have now, housing for our locals. Not bring more people here. Also, the place being considered at 6900 Sir Francis Drake is a privately owned place. Owned by a family that owns quite a bit of property in the Valley as it is. I certainly hope public monies are not going to rehab this property.	Email								X		X					X	
P - 4900 Sir Francis Drake Boulevard (San Geronimo Valley)	I do not support 98 houses on the 50 acre High School property facing Drake Blvd in the San Geronimo Valley. It would destroy our Valley's rural character and the beauty we prize in that view shed. I support seeking alternative Valley sites not visible from Sir Francis Drake Blvd to meet our affordable housing obligations.	Email								X		X						
P - 4900 Sir Francis Drake Boulevard (San Geronimo Valley)	I do not support 98 houses on the 50 acre High School property facing Drake Blvd. in the San Geronimo Valley. It would destroy our Valley's rural character, the beauty we prize in that view shed and create a new, unnecessary and unwanted village. I believe many of these West Marin sites are not strategic due to environmental concerns, lack of local jobs, and inadequate infrastructure to sustain such a population increase. I support seeking alternative Marin sites to meet our affordable housing obligations.	Email		X	X					X		X						
P - 4900 Sir Francis Drake Boulevard (San Geronimo Valley)	I do not support 98 houses on the 50 acre High School property facing Drake Blvd. in the San Geronimo Valley. It would destroy our Valley's rural character, the beauty we prize in that view shed and create a new, unnecessary and unwanted village. I support seeking alternative Valley sites to meet our affordable housing obligations. We are already working to provide affordable housing for people here in the San Geronimo Valley. Please work with our group to create homes and units that are an integral part of our existing villages. Continue to preserve our open, agricultural spaces and the green belt that surrounds this rural part of Marin county.	Email								X		X					X	
P - 4900 Sir Francis Drake Boulevard (San Geronimo Valley)	I do not support 98 houses on the 50 acre High School property facing Drake Blvd. in the San Geronimo Valley. It would destroy our Valley's rural character, the beauty we prize in that view shed and create a new, unnecessary and unwanted village. I support seeking alternative sites to meet our affordable housing obligations. Supervisor Rodoni- You have been a supporter of the environment and the agg culture of Marin. I know we need housing in Marin, but this is the wrong spot for 98 houses especially without any transit options for residents in that development.	Email						X		X		X						

Location	Comment	Source	PCL	INF	SER	TRF	PRK	PTR	ACT	NMR	SEA	NAT	CUL	FIR	WAT	HLT	EQT	GDL
P - 4900 Sir Francis Drake Boulevard (San Geronimo Valley)	I do not support 98 houses on the 50 acre High School property facing Drake Blvd. in the San Geronimo Valley. It would destroy our Valley's rural character, the beauty we prize in that view shed and create a new, unnecessary and unwanted village. I support seeking alternative Valley sites to meet our affordable housing obligations.	Email								X		X						
P - 4900 Sir Francis Drake Boulevard (San Geronimo Valley)	I do not support 98 houses on the 50 acre High School property facing Drake Blvd. in the San Geronimo Valley. It would destroy our Valley's rural character, the beauty we prize in that view shed and create a new, unnecessary and unwanted village. I support seeking alternative Valley sites to meet our affordable housing obligations.	Email								X		X						
P - 4900 Sir Francis Drake Boulevard (San Geronimo Valley)	I do not support 98 houses on the 50 acre High School property facing Drake Blvd. in the San Geronimo Valley. It would destroy our Valley's rural character, the beauty we prize in that view shed and create a new, unnecessary and unwanted village. I support seeking alternative Valley sites to meet our affordable housing obligations.	Email								X		X						
P - 4900 Sir Francis Drake Boulevard (San Geronimo Valley)	I do not support 98 houses on the 50 acre High School property facing Drake Blvd. in the San Geronimo Valley. It would destroy our Valley's rural character, the beauty we prize in that view shed and create a new, unnecessary and unwanted village. I support seeking alternative Valley sites to meet our affordable housing obligations.	Email								X		X						
P - 4900 Sir Francis Drake Boulevard (San Geronimo Valley)	I do NOT support 98 houses on the 50 acre High School property facing Drake Blvd. in the San Geronimo Valley. It would destroy our Valley's rural character, the beauty we prize in that view shed and create a new, unnecessary and unwanted village. I support seeking alternative Valley sites to meet our affordable housing obligations.	Email								X		X						
P - 4900 Sir Francis Drake Boulevard (San Geronimo Valley)	I do not support 98 houses on the 50 acre High School property facing Drake Blvd. in the San Geronimo Valley. It would destroy our Valley's rural character, the beauty we prize in that view shed and create a new, unnecessary and unwanted village. I support seeking alternative Valley sites to meet our affordable housing obligations.	Email								X		X						
P - 4900 Sir Francis Drake Boulevard (San Geronimo Valley)	I do not support 98 houses on the 50 acre High School property facing Drake Blvd. in the San Geronimo Valley. It would destroy our Valley's rural character, the beauty we prize in that view shed and create a new, unnecessary and unwanted village. I support seeking alternative Valley sites to meet our affordable housing obligations.	Email								X		X						
P - 4900 Sir Francis Drake Boulevard (San Geronimo Valley)	I do NOT support 98 houses on the 50 acre High School property facing Drake Blvd. in the San Geronimo Valley. It would destroy our Valley's rural character, the beauty we prize in that view shed and create a new, unnecessary and unwanted village. I support seeking alternative Valley sites to meet our affordable housing obligations.	Email								X		X						
P - 4900 Sir Francis Drake Boulevard (San Geronimo Valley)	I do not support 98 houses on the 50 acre High School property facing Drake Blvd. in the San Geronimo Valley. It would destroy our Valley's rural character, the beauty we prize in that view shed and create a new, unnecessary and unwanted village. I support seeking alternative Valley sites to meet our affordable housing obligations.	Email								X		X						
P - 4900 Sir Francis Drake Boulevard (San Geronimo Valley)	I do not support 98 houses on the 50 acre High School property facing Drake Blvd. in the San Geronimo Valley. It would destroy our Valley's rural character, the beauty we prize in that view shed and create a new, unnecessary and unwanted village. I support seeking alternative Valley sites to meet our affordable housing obligations.	Email								X		X						
P - 4900 Sir Francis Drake Boulevard (San Geronimo Valley)	I do not support 98 houses on the 50 acre High School property facing Drake Blvd. in the San Geronimo Valley. It would destroy our Valley's rural character, the beauty we prize in that view shed and create a new, unnecessary and unwanted village. I support seeking alternative Valley sites to meet our affordable housing obligations.	Email								X		X						
P - 4900 Sir Francis Drake Boulevard (San Geronimo Valley)	I do not support 98 houses on the 50 acre High School property facing Drake Blvd. in the San Geronimo Valley. It would destroy our Valley's rural character, the beauty we prize in that view shed and create a new, unnecessary and unwanted village. I support seeking alternative Valley sites to meet our affordable housing obligations.	Email								X		X						
P - 4900 Sir Francis Drake Boulevard (San Geronimo Valley)	I do NOT support 98 houses on the 50 acre High School property facing Drake Blvd. in the San Geronimo Valley. It would destroy our Valley's rural character, the beauty we prize in that view shed and create a new, unnecessary and unwanted village. Not to mention the massive increase in traffic and fire hazard/danger such a development would create. I support seeking alternative Valley sites to meet our affordable housing obligations.	Email				X				X		X						
P - 4900 Sir Francis Drake Boulevard (San Geronimo Valley)	I do not support new housing on the 50-acre High School property facing Drake Blvd. in the San Geronimo Valley. This important rural gateway property to the valley and nearby Pt Reyes National Seashore should remain in agricultural use as part of the historical Flanders Ranch. I support seeking alternative Valley sites to meet our affordable housing obligations. Our community will vigorously oppose such inappropriate development.	Email								X		X						
P - 4900 Sir Francis Drake Boulevard (San Geronimo Valley)	I hate to hear that 98 houses are going to be built on the 50 acre High School property facing Drake Blvd. in the San Geronimo Valley. I do support seeking alternative Valley sites to meet our affordable housing obligations, and hope that some compromise can be reached that won't destroy the beautiful approach to West Marin or further stress our limited resources. I know we are lucky to have remained untouched by "progress" for so long but oh boy I hope our luck holds a bit longer. Anything you can do to stop this unwelcome and depressing development will be much appreciated.	Email								X		X			X			
P - 4900 Sir Francis Drake Boulevard (San Geronimo Valley)	I have lived in Woodacre for over 40 years. I love the contry feel and woodsy environment. I highly object to the proposed low income housing development on Flanders property. I am your constituent, and voted for you when you were running for office. Please stop any expansion, re- zoning or building projects that will bring more residences to the Valley. I travel down San Geronimo Valley drive every day as, I work in San Rafael. When I get to the corner of Sir Francis Drake, I would be looking at the very piece of land across SFD, that the houses will be built on. As I understand the proposal, 100 houses will be built on 50 acres. The new development will also add to traffic on SFD by quite a bit. Please, let's keep the beautiful rural nature of the Valley as it is now.	Email				X				X		X						
P - 4900 Sir Francis Drake Boulevard (San Geronimo Valley)	I hope you're well and please allow me to begin by thanking you for your leadership on a range of issues important to San Geronimo Valley residents. While I know the recent report about possible locations for additional housing in the county is quite preliminary (and conducted by a third party that does not speak for Marin County residents), it makes sense that concerned citizens speak loudly and early on this topic. Please know that I do not support 98 houses on the 50 acre high school property facing Sir Francis Drake Blvd. in the San Geronimo Valley. It would destroy our Valley's rural character. It would destroy the beauty we prize in coming over White's Hill. It would create a new, unnecessary and unwanted village. Most important, it would add a possible 200 additional vehicles and possibly up to one thousand daily vehicle trips in and out of the valley to an already congested road. Anyone trying to get to Highway 101 at 8:00 am already knows that the traffic is horrible as you enter Fairfax. This would add to that exponentially. Anyone living on or near SFD Blvd. knows that the weekends are equally tough with many tourists heading to and from the coast. While I support affordable housing I believe there are better ways and better locations to accomplish this.	Email				X				X		X						

MARIN COUNTY HOUSING ELEMENT: CANDIDATE HOUSING SITES AND SELECTION PROCESS
COMMENTS RECEIVED VIA EMAIL

Location	Comment	Source	PCL	INF	SER	TRF	PRK	PTR	ACT	NMR	SEA	NAT	CUL	FIR	WAT	HLT	EQT	GDL
P - 4900 Sir Francis Drake Boulevard (San Geronimo Valley)	I just want to add my voice to ask you not to support the new San Geronimo housing being considered. The environmental and infrastructure impact will be horrible !	Email		X								X						
P - 4900 Sir Francis Drake Boulevard (San Geronimo Valley)	I oppose 98 houses on the 50 acre High School property facing Drake Blvd. in the San Geronimo Valley. .West Marin is maxed out on development because of fire concerns, small roads, septic. The proposed development at the west side of whites hill is the headwaters of the Lagunitas creek which is our coho salmon nursery. It's a floodplain and is unsuitable for development. The infrastructure needed for a development would harm our fragile ecosystem. If Marin County decides to do what the State is demanding, then why not put the entire buildout on the St. Vincents property which is right next to the freeway and could handle the increase in population. We would like to see all the building be for homeless and low income people - like all the people who commute from Vallejo and Richmond to serve us daily because they can not afford to live in our county. Many other properties in Marin would be more suitable.	Email				X				X		X		X	X		X	
P - 4900 Sir Francis Drake Boulevard (San Geronimo Valley)	I oppose a housing development the 50 acre High School property facing Drake Blvd. in the San Geronimo Valley. .1. West Marin is maxed out on development because of fire concerns, small roads, septic. 2. The proposed development at the west side of whites hill is the headwaters of the Lagunitas creek which is our coho salmon nursery. It's a floodplain and is unsuitable for development. 3. The infrastructure needed for a development would harm our fragile ecosystem. 4.Building would ruin agricultural, rural beauty which is so precious to the San Geronimo Valley. 5. If Marin County decides to do what the State is demanding, then why not put the entire buildout on the St. Vincents property which is right next to the freeway and could handle the increase in population. We would like to see all the building be for homeless and low income people - like all the people who commute from Vallejo and Richmond to serve us daily because they can not afford to live in our county. Or work with the state to move San Quentin out to a more appropriate place for a prison such as barren land in the dessert, and make a beautiful development on the waterfront right next to shops and the ferry and the Richmond Bridge which would be easy access to transportation and would not overburden Sir Francis Drake which is already far too congested. Many other properties in Marin would be more suitable.	Email				X				X	X	X		**X**	**X**			
P - 4900 Sir Francis Drake Boulevard (San Geronimo Valley)	I support adding housing in appropriate locations. I do not believe the west side of White's Hill, on Tamalpais School property is appropriate. The area is prone to flooding and is vital for supporting the flow of water in the creeks that are used by salmon. Also, the county plan has been to add housing on the 101 corridor, leaving west Marin rural. As a member of the Valley Emergency Response Team, I am concerned about adding so many more cars on the road, ensuring a bottleneck in the event of an emergency evacuation.	Email									X	X		X				
P - 4900 Sir Francis Drake Boulevard (San Geronimo Valley)	I support adding housing in appropriate locations. I do not believe the west side of White's Hill, on Tamalpais School property is appropriate. The area is prone to flooding and is vital for supporting the flow of water in the creeks that are used by salmon. Also, the county plan has been to add housing on the 101 corridor, leaving west Marin rural. As a member of the San Geronimo community, I am concerned about adding so many more cars on the road, ensuring a bottleneck in the event of an emergency evacuation.	Email									X	X		X				
P - 4900 Sir Francis Drake Boulevard (San Geronimo Valley)	I think that the proposed low cost housing sites and sizes and the solution is not thought out ! For instance , the 98 homes in Woodacre would create a huge traffic problem and also be inappropriate . The Olema location and proposal would ruin the nature of Olema ! And Dennis Rodoni lives in Olema ! The west Marin area has been protected for a reason ! The nature and small town is the reason that we are all here ! I've lived here for 46 years and believe that it would be more appropriate to absorb the housing on properties that are all ready developed and make it attractive for homeowners to build ADUs Please revise the thinking around this important topic of affordable housing !	Email				X				X		X						
P - 4900 Sir Francis Drake Boulevard (San Geronimo Valley)	I'm not sure if this is accurate, but we have heard a site for 98 new homes is being proposed at the base of Whites Hill. We can only hope this is not true as that would be disastrous for the area and environment, and truly spoil the natural surroundings	Email										X						
P - 4900 Sir Francis Drake Boulevard (San Geronimo Valley)	It has come to my attention, either from neighborly chats or from other sources, there is a potential plan taking shape to add housing to the San Geronimo Valley. Specifically close to 100 houses on the land we refer to as "Flander's Field", where there was once a plan for a high school. That plan didn't materialize, as this valley began to be more declarative and assertive in stating the vision for this area, and guidelines for what is / is not acceptable development. When I moved to the valley 25 years ago, I thought it might be a place to stay for a couple of years. But after understanding this community better, and listening to our elders, I came to understand and appreciate what our environmental advocates have been fighting for and diligently guarding. This is the reason I still live here today. In my home town, I watched as the cherry trees toppled, the apple orchards fell, and the planting fields gave way to urbanization and development. It still breaks my heart whenever I drive through and see the Police Station, Post Office, County Buildings and parking lots where I once played with my friends and frolicked with my dog. I am filled with such gratitude to live here in the San Geronimo Valley, comforted in knowing this place is truly special. Magical. I now take up the fight to preserve our natural beauty and the ecosystems that depend on limits to growth. My neighbor refers to entering the valley as the "Chitty Chitty Bang Bang effect", where the wheels of the car roll up under you and you start to float along in the last part of your journey home. Please help us keep this natural beauty as opposed to a Shitty Shitty first impression entering this sacred place. Also, this would impact and devastate what little is left of our natural habitat for spawning salmon...I've witnessed and taken part in many debates and county board meetings to force the stoppage of building homes due to this deleterious impact. 98 homes will be a huge battle, but taking a cue from our long term residents, environmental groups, and our elders, I can't stand back and watch this happen. I look forward to understanding both of your positions on this subject. Signed, a long time Marin tax payer, diligent voter, and newly commissioned soldier in the fight to preserve my surroundings	Email										X						
P - 4900 Sir Francis Drake Boulevard (San Geronimo Valley)	Please don't approve this development! It is way too big and is in a terrible location. It will destroy the beautiful view that every Valley resident welcomes on their return home to the SG Valley. Yes we need some affordable housing, but not on this parcel, and not at market rate. The Sir Francis Drake corridor in San Geronimo should remain rural. This huge development would create a new, unnecessary and unwanted village.	Email								X		X					X	
P - 4900 Sir Francis Drake Boulevard (San Geronimo Valley)	Please don't support the development of 98 units on former Flanders Ranch land in the San Geronimo Valley. This site stands at the gateway to the SGV and the headwaters of the watershed which houses our endangered salmonids. It is an especially sensitive location, both aesthetically and ecologically, and should be protected from all development. Just a couple of years ago, you and the BOS attempted to do a very good thing for Marin County and the SGV by purchasing the golf course, in order to protect it permanently from development and to give endangered salmonid populations a place to recover. Probably, in a few years' time, some public entity—possibly Marin County—will resume the pursuit of these goals when TPL sells the land. If the County allows a new village of several hundred people to be built, with all the ecological disturbance that entails, just a short distance upstream from the salmonid sanctuary, it will jeopardize this important environmental restoration project. I believe the 98 units are envisioned to be targeted to buyers of "above moderate" income. If so, then this suggests that the homes will be too expensive to count as the sort of affordable housing that the voting public sympathizes with. We don't want a SGV that is even more exclusive (economically speaking) than it already is—especially not at the expense of the ecology, aesthetics, etc. Please do all you can to keep the old Flanders Ranch area completely open and agricultural. Thank you very much.	Email										X					X	
P - 4900 Sir Francis Drake Boulevard (San Geronimo Valley)	Please understand that our history and values are not supportive of mass development in the San Geronimo Valley. We value our rural character for aesthetic reasons but equally for safety. We must protect egress for fire primarily. In addition we do not have the infrastructure and resources to support 98 new homes. This ideal would be better served along the 101 corridor. Thank you for consideration of supporting no development of the open fields adjacent to Flander's property.	Email		X							X		X		X				

Location	Comment	Source	PCL	INF	SER	TRF	PRK	PTR	ACT	NMR	SEA	NAT	CUL	FIR	WAT	HLT	EQT	GDL
P - 4900 Sir Francis Drake Boulevard (San Geronimo Valley)	Remove the high school site from any consideration for housing. It is not supported in our Community Plan (see excerpts below). In addition, this is the critical view shed that every Valley resident experiences and "welcomes" on their return "home" to the San Geronimo Valley as they negotiate the curve, going west, at the bottom of White's Hill leaving the eastern urbanized corridor (where over 90% of Marin residents live), behind. This priceless Valley view encompasses the entire Ottolini/Flanders ranch and the Spirit Rock Meditation Center property from the meadows on the flats, to the uplands and ridge that seems to disappear going west towards the Nicasio pass. High School Site Issues: The development currently proposed would create the equivalent of a "new" village and its location next to SF Drake Blvd. would destroy the Valley's rural character. Increased traffic would overwhelm Drake Blvd. in route to and from the eastern urbanized corridor and 101. The north east section of San Geronimo Creek, which is home to coho salmon and steelhead trout, appears to be in this area. If confirmed, protection of this area could impact proposed development. FYI - Historically, this 50 acre school site was originally owned by the Ottolini/Flanders Ranch family. It was condemned for use of a planned High School -- part of the '61 Master Plan calling for 20,000 residents and 5000 homes. This '61 Master Plan was scuttled in 1972/73 after the newly elected Board of Supervisors voted to adopt the new County Wide Plan. Subsequently, the BOS began the development of highly successful Community Plans for designated areas in West Marin. At one point, (the '80's I think) the Tamalpais school board considered selling it's 3 unused school sites. Two were in the eastern corridor and one was in the Valley. The board appointed a committee to study the situation and make a recommendation. It was composed of Kate Blickhahn (Drake High School Superintendent), Dale Elliott of Forest Knolls and me. They implemented our recommendation to sell the two sites in the eastern corridor and preserve the Valley site for agriculture. The Flanders family subsequently worked out a lease (still in effect) with the District so their cattle could use it for grazing as was done when they owned it. Two proposals to create an orchard never materialized	Email				X				X		X							
P - 4900 Sir Francis Drake Boulevard (San Geronimo Valley)	The proposed 98 new houses on the 50 acre parcel in the San Geronimo Valley was just brought to my attention. I am not opposed to more housing, but I am opposed to how and where they will be built i(n a cluster creating a new community as well as changing the landscape as you enter The Valley). There have been other projects in the past that are woven into the existing communities. The low cost neighborhood next to the Trailer park is a fine example. I am assuming that this Federal money is to be used for our lower income population? I have lived in the Valley for 50 years at which time we voted against sewer lines and natural gas in order to keep housing developments from taking place. Will a project this large take that into consideration? I will be sure to be adding my input as this project moves forward. Dennis, as old acquaintance I'm hoping that we can find time to discuss this more, I am no longer 'asleep at the wheel'….Thank you for taking my opinion into consideration.	Email		X						X		X			X		X	
P - 4900 Sir Francis Drake Boulevard (San Geronimo Valley)	This is a terrible idea! I can tell you that it will become another problem like Victory Village. You can't just plunk down a totally different community (with different needs and mind-sets) inside another unique community. And what about water !??!?!?!?! I do not support 98 houses on the 50 acre High School property facing Drake Blvd. in the San Geronimo Valley. It would destroy our Valley's rural character, the beauty we prize in that view shed and create a new, unnecessary and unwanted village. I support seeking alternative Valley sites to meet our affordable housing obligations	Email								X		X						
P - 4900 Sir Francis Drake Boulevard (San Geronimo Valley)	This proposal make no sense for multiple valid reasons. Please do what you can to reject it.	Email								X								
P - 4900 Sir Francis Drake Boulevard (San Geronimo Valley)	While I support adding housing in WMarin, I believe the White Hill location is not appropriate for the reasons below: This clearly goes against our Community Plan. It is an area prone to flooding As a result of the above, it interferes with the watershed that provides the creeks that support the endangers steelhead. It will place untold stress on an already precarious road evacuation during wildfire season. the Valley is already under major stress with failing septics, with no help on the horizon as has been blocked by the Planning Group. The Valley and it's homeowners are about to be handcuffed by the new stream side ordinances, making repairs and maintenance near impossible, so the added burden of 68 homes is such a double standard. The rural character of the Valley will be visually destroyed. .I am curious why this information has been held from the public and the very short window of public comment which further punctuates your desertion, the same way you mid-handled the Golf Course debacle. Please respond with a confirmation of my very strong objection to this location.	Email								X	X	X						
R1 - 5800 Sir Francis Drake Boulevard (San Geronimo Valley)	(Comment edited for length) Please find attached the San Geronimo Valley Planning Group's response to the proposed Housing Element update. Background: The San Geronimo Valley Planning Group was formed in 1972 to help elect Gary Giacomini to the Board of Supervisors in order to gain the critical third vote necessary to kill the 1961 Countywide Master Plan, which had envisioned 5,000 new homes and 20,000 additional residents for the San Geronimo Valley alone. While the plan was updated in 1982 and 1997, its central premise has never changed: preserving our Valley's rural character and protecting our natural environment. This commitment - along with that of many other community members - also helped permanently preserve more than 2,300 acres of open space in our beloved Valley. We have been trying to apprehend the efforts of Marin County to meet the state- mandated "housing elements" through the rezoning of existing parcels. We are very concerned that few Valley residents are aware of the potential impact of this housing mandate on our community and that the Planning Group was not included in the process from the beginning. Apparently, pressure from the State has made it a top- down County effort. The Planning Group adamantly opposes the proposed, potential locations within our community identified below. High school property - We are alarmed by Candidate Housing Site P, the proposal to build 98 above-moderate-income units through rezoning the high school property next to the Ottolini/Flanders' Ranch at the bottom of White's Hill on Sir Francis Drake Blvd. Our Community Plan clearly spells out that the use of this property should remain as agriculture or open space; the high school district agreed. Our reasons are numerous. 1. It would be a visual blight, destroying not only the aesthetics of the entrance to our Valley but also jamming suburbia into the inland rural corridor. 2. It would be a dangerous location, creating a separate enclave with an entrance off a very busy highway, and removing one of the few places where traffic can safely pass slower traffic. 3. Because this property is not within the boundaries of any of our four villages, it would destroy the essence of our Valley's character, creating, in essence, a new, completely separate village of above market-rate houses. Moreover, there is no sewage or water infrastructure at this location. 4. It is an environmentally poor choice, being a wetland area, a swamp in the winter, and within the headwaters of the Lagunitas Creek watershed. Former golf course club house property. Candidate Housing Site R-1. This open space, referred to as the Commons, must remain open space and not also become a "new village" location. In addition to being the likely site for a new firehouse, this is an essential area for community gatherings, and provides needed parking for and access to Roy's Redwoods, Maurice Thorner Open Preserve, and the two, newly conservation easement-protected meadow parcels (former front and back nine). The Planning Group does favor affordable housing in the Valley. We want our residents and their children to be able to afford to remain in our community and to maintain our diverse population. But the current plan seems to be solely a County "numbers game," meeting only the requirements of the State for 3,569 units in unincorporated Marin. The parcels in the Valley are identified for families earning more than $132,000 annually. For an individual, this would be the equivalent of $62.50 an hour. The Valley is a rural community. The minimum wage in California is $14 an hour. Anyone who works a full- time job should be able to afford decent housing. This plan does not provide that. The County must focus on the real need for affordable housing, with more emphasis and incentive on legalizing existing units and making it easier to create second units, ADUs and JDUs. A stronger effort is needed by the County to find appropriate parcels within our existing villages. Potentially, this might include the current location of the County fire department, which, if/when it's vacated, could be an excellent location for affordable multi-family housing. There are others. A time constraint shouldn't be the deciding factor in zoning parcels for housing. There has to be more thought put into this and community involvement shouldn't be limited to a flawed survey. We request the County hold an in-person meeting for the community as soon as possible, preferably in the multi-purpose room at Lagunitas School. Additionally, the Planning Group would like to work with you to find a way to provide more affordable housing units within our community while continuing to maintain and protect the rural character and natural resources that make our Valley such an attractive place to live and raise a family.	Email (See Email Comments Received.PDF, pp. 234-236)				X	X	X		X		X						X	
R1 - 5800 Sir Francis Drake Boulevard (San Geronimo Valley)	1: can we use the Lagunitas school parcel that is before the Spirit Rock parcel? 2: If Spirit Rock is built on can it be hidden from road? 3: The visual view when you enter the Valley is gorgeous and should be maintained. 4: Lagunitas school campus has lots of unused space.	Email										X						

MARIN COUNTY HOUSING ELEMENT: CANDIDATE HOUSING SITES AND SELECTION PROCESS
COMMENTS RECEIVED VIA EMAIL

Location	Comment	Source	PCL	INF	SER	TRF	PRK	PTR	ACT	NMR	SEA	NAT	CUL	FIR	WAT	HLT	EQT	GDL
R1 - 5800 Sir Francis Drake Boulevard (San Geronimo Valley)	I could not access the Balancing Site work area so I am submitting these comments here. SGV is am amazing place to be due to low development. I have had the benefit of living here 25 years. What is being proposed in both of the areas of the School property and at the Gold Course are for higher end homes. Higher end homes are not a help for our community. We need homes for families with kids, We need Senior housing. We don't need another 127 above moderate income homes. Have some vision. Create a place with a grocery store, deli, and place for people to meet. Create Senior housing. Have ability to share vehicles. This area could become a hub for our community to use and support. It is also a sensitive environmental area. It used to be where water would spread out when it rained and slowly sink into the ground providing water all year round for the fish. More concrete and asphalt = more runoff. This vision of 98 separate high end homes here is not fitting to the rural area of our valley. It is just going to bring in more people who want a rural lifestyle from other areas and NOT give our locals homes. Every day, people, and families are looking for homes. Renters are being pushed out. It is unaffordable to live here. Solve the problem we have now, housing for our locals. Not bring more people here. Also, the place being considered at 6900 Sir Francis Drake is a privately owned place. Owned by a family that owns quite a bit of property in the Valley as it is. I certainly hope public monies are not going to rehab this property.	Email								X		X					X	
R1 - 5800 Sir Francis Drake Boulevard (San Geronimo Valley)	I just want to add my voice to ask you not to support the new San Geronimo housing being considered. The environmental and infrastructure impact will be horrible !	Email		X								X						
R10 - 200 San Pedro Road (Santa Venetia)	Hello and thank you for the opportunity to comment regarding Future Housing Sites in Marin County. I attended the local Housing meeting regarding Santa Venetia and Los Ranchitos on February 15th and live in the Santa Venetia area. Here are my comments from a Santa Venetia resident perspective: 1. The process, while advised by the Marin County Planning Department, is being run by a consulting agency that is not familiar with Marin County and the local areas & neighborhoods. 2. The number of assigned housing units to Santa Venetia, 422, ignores the following. Before housing site numbers are assigned and accepted, a "CEQA-lite" analysis should be performed to determine if the numbers and locations are practical from a CEQA perspective. We heard these concerns brushed off with the response that if any development is going to be done, a full CEQA would be completed before development could/would proceed. This would be an "after-the-fact" process, with the fact that the housing numbers and sites have already been assigned and accepted, and would be too late to be influential in the development process. a. There is only one practical vehicle road out of Santa Venetia to the freeway that is already heavily impacted by three schools, the one at the JCC, the Marin School, and Venetia Valley school, and a large pre-school. Traffic in & out of Santa Venetia is also already heavily impacted by the JCC, the Civic Center traffic, the Marin Lagoon traffic, the Veterans Memorial traffic, the Marin Lagoon Housing and the commercial enterprises along McInnis Parkway. b. Some of the sites selected are in wetlands areas, such as the McPhail school site next to North San Pedro Road. c. some of the sites selected are next to the Bay and subject to special development restrictions, such as the McPhail school site. d. The total number of housing units assigned to Marin County, and not just to the unincorporated areas, does not take into account the water needs. And we, Marin County as serviced by MMWD, are in the middle of a water shortage with future years looking to be worse due to Climate Change. 3. Using city limit boundaries to direct neighborhood focus and comment ignores the reality of the holistic nature of a neighborhood that crosses city limits and unincorporated boundaries. It is expedient, especially for an outside consulting firm not familiar with Marin County or Santa Venetia, but not realistic. This is especially true for the Santa Venetia area. Santa Venetia is heavily impacted by what the City of San Rafael does or does not due around the Civic Center, at the intersection of North San Pedro Road and Civic Center Drive, around Marin Lagoon Park, at the Marin Lagoon homes neighborhood, and at the Marin Ranch Airport. Using city limit boundaries is expedient but not accurate and realistic in appraising housing impacts to a neighborhood such as Santa Venetia. And restricting the geographical area that Santa Venetia residents can comment on and have input to, to not include what is inside the City limits of San Rafael for the areas noted above is violating our rights to comment on and have input to what is impacting our neighborhood. Thank you for the chance to comment	Email				X				X				X	X			
R10 - 200 San Pedro Road (Santa Venetia)	Here in Santa Venetia, we are living with water shortages, traffic congestion, and our community's evacuation route was named the most dangerous in Marin and yet huge additional numbers of housing are proposed for this flood prone neighborhood. That's insane! We are not fooled by claims that these new residents won't drive everywhere. They will. We already know that every person of driving age in our neighborhood not only drives but owns a car, or truck. They line our streets, further restricting access routes. There are sites where housing can happen like at Northgate Mall, but not in our overcrowded flood zone.	Email				X				X	X			X				
R10 - 200 San Pedro Road (Santa Venetia)	I am a longtime resident of Santa Venetia in unincorporated Marin County, and a member of the Santa Venetia Neighborhood Association (SVNA). I, along with many of my neighbors, attended the February 15 Zoom meeting on the Housing Element initiative, which seems detached from the reality of worsening climate change. Much of Santa Venetia exists in a flood plain; other parts are in the WUI. With only a single one-lane route in and out of the neighborhood — North San Pedro Road — our existing infrastructure is already stretched to the breaking point with daily traffic congestion restricting both egress and ingress. We currently have fewer than 1800 residences in Santa Venetia, yet the Housing Element recommends 422 additional units, representing an increase of approximately 25%. Adding a fraction of 422 units to Santa Venetia would greatly compromise the safety of its residents, in addition to degrading quality of life. Many of our homes were built in the WUI. We are at constant risk of wildfire, with unstable hillsides that in recent years have collapsed onto North San Pedro Road. Like all of our Marin neighbors, we are constrained by drought. Here in Santa Venetia, our water supply comes from tanks that are sited in the WUI. Supplanting CEQA review in the drive to create multi-million-dollar homes puts our cultural as well as our natural environment at risk. For example, Oxford Valley, a known site of native tribal artifacts such as shell mounds, has been designated for 45 "above moderate income" units. Bypassing CEQA would eliminate the protection of cultural resources here and in other areas of Santa Venetia and Marin that have not yet been surveyed and would be lost forever. Our neighborhood is known to be at severe risk of flooding. The SVNA is currently participating in a collaboration between the California Dept of Parks and Rec, The County of Marin, and The SF Bay NERR to "Identify and Evaluate Sea Level Rise Adaptation Options to Solve Road Flooding in China Camp State Park." The project recently received a $525k grant to address the critical issue of flooding in the low- lying segment of North San Pedro that runs between Santa Venetia and Peacock Gap. This road is our only alternate route to Highway 101, one that our emergency responders rely upon when highway traffic is heavy. Here is a link to the July 26, 2021 article in the Marin IJ that describes the flooding (which is only expected to worsen) and touches on our risk of impeded egress/ingress in the event of a natural disaster: https://www.marinij.com/2021/07/26/china-camp-road-flooding-project-gets-525k-grant/ The Housing Element did not seem include plans for significant numbers of true low- income housing. In the future, we would like to see a plan that factors in housing that our neighbors throughout Marin County could afford.	Email			X		X				X	X	X	X	X	X			
R10 - 200 San Pedro Road (Santa Venetia)	I am against the proposed units on North San Pedro Road. This proposed project is completely unsustainable and not researched for undesirable living situations. There are many factors that indicate this would not be a good site to build. Factors such as flood control, sea rising at a rate we can expect in the coming years, congestion, removal of a ball park and mostly there are no services to support this project. Well thought out projects include parks, services, bike paths, sidewalks and a reasonable egress in case of fire. North San Pedro Road is all ready congested due to a large school and many churches on this road. Another road to San Rafael is available to Point San Pedro Road however this road is failing due to floods in the winter and very evident sink holes that are not being addressed. More traffic would of course erode the roads further and in the past have had slides on this road particularly after recent tree removal has increased the likely occurance.	Email		X	X	X				X	X	X		X				

Location	Comment	Source	PCL	INF	SER	TRF	PRK	PTR	ACT	NMR	SEA	NAT	CUL	FIR	WAT	HLT	EQT	GDL
R10 - 200 San Pedro Road (Santa Venetia)	I attended the zoom meeting a few nights ago. I share the concern of some of my neighbors, well articulated by Gina Hagen. While I totally support affordable housing (so question if this will be "affordable" for working class people), I think we already have too many high density buildings on San Pedro Road, Jcc, school, rest homes, elder affordable housing, civic center etc... So I would support maybe 25 more units or something manageable, but hundreds seems like asking for trouble in an emergency. I live on Labrea way and I am glad we have housing for families, down the street, but a common problem is the amount of cars and high occupancy of some of the apartments. The overflow of cars goes all the way to Rosal, and currently I have had cars parked in front of my house for a month and more. It is not a significant problem in my case, but my neighbor who has teenagers with cars, is having to struggle to park their own cars, while the overflow is from housing two blocks away. Obviously San Rafael is a good place for more housing and i would think a place closer to the freeway like Marin Square could be used for extra units of housing. I also would personally like to build an accessory unit in my front yard for a student, teacher, medical professional, at affordable rate. It would be nice to have a department in Marin county who could help seniors like myself design,, get permits, and loans to afford to create such units. I myself was a renter in Marin for 36 years and lived in in-law apartments. I found it much more private and a win/win solution for the owner, typically older retired person, and myself as young professional. I was excited about an organization called Lily Pads and attended a meeting but found out later the owner was no longer providing services. So this would be a great thing to promote. Thank you for including us in your work. Hope we can have more affordable housing, while preserving the safety of our neighborhoods.	Email					X			X							X	
R10 - 200 San Pedro Road (Santa Venetia)	I served on the Santa Venetia Community Plan (SVCP) Committee for almost 10 years, including working with County Staff the last 4 years, until its final adoption in 2017. This process included a thorough survey of our neighbors who commented on every empty parcel and open space for future development (and in fact Godbe told us the response was overwhelming with a higher than normal percentage of participation). Our SVCP Committee Members represented every corner of Santa Venetia. We held community meetings (that were well-attended) so all residents had a chance to voice their opinions and ideas. No one knows Santa Venetia better than Santa Venetians. The plan was supposed to cover everything of interest to ensure a diverse, family-oriented, and happy community for years to come. Adding 442 units is simply untenable for a small, working-class hamlet such as Santa Venetia. The last two open spaces (two ball fields) are slated for high density housing. This is totally uncharacteristic of the surrounding neighbors who live in small, single- family housing. In the February 15th Housing Element Zoom call, with County Staff and Contractors from… who knows where?, we were informed that our Community Plan would need to be updated. Who would do this work? When and how soon would these updates happen? How can the County randomly update our Community Plans that we spent so many resources on. SB-9 and SB-10 are a complete contradiction to our Community Plan that we dedicated years of work and volunteer hours to finally see its adoption. These past summers, we've stayed inside due to smoke and/or triple-digit weather. We used a bucket from our shower to water our indoor and deck plants while our yard withered and died due to restrictions and requirements in place from Marin Water. We worked out evacuation routes to alert residents to escape danger due to our one road in and out of Santa Venetia. I heard chain saws, chippers, and weed whackers almost every day, regardless of the high, fire-danger days. This is due to San Rafael Fire Department notifications and requirements. Also, there is currently a plan in place for creekside residents to have their wooden levees raised two feet to protect the sinking, below-sea-level homes in the flood zone (Zone 7), due to Sea Level Rise. The CDA is currently working on a "Safety Overlay Map" to be completed after the Housing Element site are chosen. Isn't this a case of "putting the cart before the horse"? Due to the location of Santa Venetia, nestled before the ripe, fire-prone area of San Pedro Ridge and the rising Las Gallinas Creek, doesn't this deserve a second look and/or consideration of the over-inflated number of units allotted to our small hamlet. When talking to my neighbors, the 422 units sounds so incredulous, they find it impossible to believe. As a volunteer, seasoned Land Use Member, I can't say I blame them. It's mind-boggling. Please reconsider Santa Venetia's allotted housing site numbers.	Email									X			X	X			
R10 - 200 San Pedro Road (Santa Venetia)	I will reiterate the comments I made at the February 15 Housing Element meeting… I've lived in SV for over 30 years. I've served on the Santa Venetia Neighborhood Association Board of Directors for almost 30 years. Through our neighborhood association, The Santa Venetia Neighborhood Association (SVNA), we try to get the word out so that our residents are aware of upcoming projects and opportunity to comment. We've heard from Santa Venetia residents that they want to protect our quality of life. We are already concerned about the constant fire danger, flooding, Sea Level Rise, ingress and egress, and unsafe evacuation routes. Climate change is a huge concern for us and as well, we have run out of water in Marin County and are under strict mandates, so I can't understand how adding more and more housing units will help. And to restate, 422 units in SV is an increase of almost 25% of the 1,700-1,800 units we currently had, at last count. It's a very shocking number of additional units for us. I grew up in San Rafael. I hate what they've done to the City and have been constantly disappointed with the building choices and what they have given up. I don't want to see that happening in Santa Venetia – more congestion and loss of our green spaces. Affordable housing sounds great on paper, but we never seem to get that promise fulfilled. I've followed projects in San Rafael and for almost every project, the promise is a huge amount of housing with a small portion designated affordable and then after the project passes through the hurdles, the affordable-housing number is adjusted… always downward. I remember previously rules were passed to keep up with the demand of affordable housing, but the goalposts seem to constantly change and that number is lowered. What is the promise that won't happen with this process? Also, I heard them say at that meeting, they were giving schools and churches more flexibility by allowing them to build on parking lots? If that is the case, where will people park? They've already lowered the parking needed for new building in our communities. We already have overblown congestion, car-to-car parking along the road, and lots of red curbs. The idea of reducing parking requirements for new units AND building on parking required for old units is frightening. And finally, I realize this mandate for housing comes from the state. I believe we (my neighbors) are all on the same page when I ask that you push-back against these mandates. These are not only unrealistic for Santa Venetia but for all of Marin, the wonderful county I grew up in.	Email								X	X	X		X	X		X	

Location	Comment	Source	PCL	INF	SER	TRF	PRK	PTR	ACT	NMR	SEA	NAT	CUL	FIR	WAT	HLT	EQT	GDL
R10 - 200 San Pedro Road (Santa Venetia)	Re: Marin County Housing and Safety Elements Update, 2023 – 2031. The Santa Venetia Neighborhood Association (SVNA) is an organization representing the interests of 1,700 – 1,800 households (4,474 residents per the 2019 census figures) who live in Santa Venetia. As an organization, we are dedicated to the enhancement and preservation of the character and quality of life of the Santa Venetia neighborhood. We do our best to represent our community and have an established reputation to be a voice for proper development. And in accordance with our mission statement, we, the Board Members of the SVNA, feel compelled to comment on this issue. We want to ensure that the Marin County Board of Supervisors receives an accurate impression from our community regarding the updated Housing Element and are writing today to summarize feedback we have heard from many of our members. Many residents of Santa Venetia, including members of the SVNA, attended the February 15 Zoom meeting where consultants representing the interests of the housing element initiative presented online tools for community feedback. We find these tools inadequate; rather than serving as an open platform for the BOS to receive realistic community input, they seem designed to provide information to housing element staff as to where to add more housing. The Housing Element recommends 422 additional units for Santa Venetia. There are currently fewer than 1,800 residences in Santa Venetia, so this represents an increase of approximately 25%— far more growth than the neighborhood has seen for at least two decades. This mandate seems utterly siloed from the worsening reality of global warming and climate change, (the existence of which was recognized both in the Countywide Plan and by the Marin County Civil Grand Jury) which is leading to catastrophic weather events such as fires and flooding. The upland parts of Santa Venetia not directly threatened by flooding are part of the Wildland Urban Interface (WUI) and are subject to year-round fire danger. Like all of Marin, we are constrained by drought, and our water supply comes from tanks that are sited in the WUI. We are actively working actively to protect our homes; parts of Santa Venetia are now Firesafe Marin neighborhoods. Road access to Santa Venetia is highly constricted; we have daily traffic congestion that affects both egress and ingress. The remaining undeveloped parts of Santa Venetia include unstable hillsides that recently led to multiple landslides onto our roadway. All of the issues mentioned above are familiar to the Marin County BOS. They are also the same reasons that Santa Venetia has not experienced anything close to 25% growth in decades. There is no way to grow by 25% using market-rate housing on undeveloped parcels without compromising our safety. The Housing Element directly suggests that our personal safety, including safety from climate events, fire, and safe water supply, is secondary to their objectives of housing growth. One type of growth we believe is needed in Marin County is true low-income housing. By this we mean the type of housing that our current typical Santa Venetia resident could afford. We also support the right of residents to add accessory dwelling units (ADU) to their homes. However, it was clear that the Housing Element does not include plans for significant numbers of low-income housing. Instead, it promotes “market rate” housing, which we know means homes that will sell for millions of dollars each. We are effectively being asked to endanger ourselves to serve the interests of developers to sell multi-million- dollar homes to elite buyers from outside of the region. To paraphrase one of our SVNA members, “The County’s first responsibility is for the health and safety of the existing residents of our neighborhood.” We ask you to consider this as you move forward. If the intent of the Housing Element is to bypass CEQA process, as alluded to in the Zoom meeting on Feb. 15th, the existence of culturally sensitive resources, including shell mounds in Oxford Valley, still cannot be ignored. Damaging cultural resources of native peoples in order to comply with Housing Element goals would be inconsistent with Marin County values and our historical respect for our earliest Santa Venetia natives. Oxford Valley, the site of known shell mounds, has been designated for 45 “above moderate income” units. Other areas of Santa Venetia may not yet have been properly surveyed for these resources, and bypassing CEQA would also eliminate their protection. These are just a few of the concerns that we have. The SVNA has encouraged our members to send comment letters as well, citing their concerns about this update. Please include those concerns as concerns of the SVNA	Email				X				X	X			X	X		X	
R13 - 26600 State Route 1 (Tomales)	I would like to suggest an alternative site to the one listed on the east side of Hwy 1 and 1st Street in Tomales. After living in Tomales very close to 30 years, I feel the intersection there is already quite impacted due to school traffic approaching both elementary and high school, the district office traffic, our downtown businesses Including bakery, deli, and general store and much weekend tourist traffic mistaking their way to Dillon Beach. I feel one or more of the sites at old high school, or further north of “hub” of town would be more suitable and would not add to the current congestion.	Email				X												
R15 -12785 Sir Francis Drake Boulevard (Inverness)	The proposed development and locations designated for housing in unincorporated West Marin is ill-conceived and inappropriate. This appears to be a numbers game on the part of the County and outside, contracted MIG development agency. The plan lacks consideration for or understanding of natural resources, environmental hazards and the existing community. Communities around Tomales Bay are watershed areas with drainage into the vulnerable bay, creeks and streams, the salt marshes and wildlife habitats. The site near Vladimir’s restaurant, across from Dixon Marine, is directly across from Tomales Bay and almost at sea level. This area and the road can flood during a high tide or heavy rain, draining pollution into the bay. Also the proposed building would affect the small downtown of Inverness. West Marin is served by narrow, curving, two lane access roads. For Inverness there is only one road, in or out, a problem during flooding, fires, landslides and general overcrowding on weekends and holidays. These roads frequently need repair when lanes crumble into a creek, hillside or the bay. No freeways please, as was proposed in the 60s. I have lived in Inverness since the 70s. As a single working mother, a teacher, I raised my daughter in Inverness. Over the years I have seen families and friends move away as rentals, cottages and small units were converted to more lucrative Airbnbs and second homes. There are 4 houses around me with 2 units in each. Two are completely unoccupied. Two are rarely used by their absentee owners, leaving each second unit vacant. There are many houses like this in Inverness and far too many BnBs and other short term rentals. An absentee owner might purchase a house, spend an exorbitant amount of money improving it for short term rental or investment. Possible housing is currently available. West Marin already has serious problems related to climate change, as well as overcrowding, road congestion air and noise pollution from cars, sewage and, most obviously, water. Inverness is served by water storage tanks and is already predicted by IPUD to be more of a problem this year than last. Reservoirs dry up and water pipes only move water from one drought ridden area to another. Any development is a threat to our limited water supply. The arbitrary number of proposed building in these unincorporated areas of West Marin ignores the environment, nature and roads. The plan is insensitive to the existing communities and the influence of inappropriate, even hazardous, building.	Email				X					X	X		X	X			

Location	Comment	Source	PCL	INF	SER	TRF	PRK	PTR	ACT	NMR	SEA	NAT	CUL	FIR	WAT	HLT	EQT	GDL
R18 - 375 Shoreline Highway (Tamalpais)	(Comment edited for length) Sustainable TamAlmonte has the following comments and recommendations regarding the merits of the above referenced Tam Valley, Almonte, and Manzanita Candidate Housing Sites listed in the 2023-2031 Housing Element DRAFT Candidate Housing Sites List. Due to the unique characteristics of the area, encouraging residential development, especially high-density development, at the above referenced Sites would increase the risk of undue harm to the environment and undue hardship, illness, injury and/or death to the current and future residents. The Tam Valley, Almonte, and Manzanita commercial lowlands, in which the above referenced sites are located, experience the most number of environmental constraints and hazards of any area in Unincorporated Marin. Both the Marin Countywide Plan's EIR and the 2012 Housing Element's SEIR demonstrate that development at these sites would exacerbate the existing dangerous conditions and add new significant adverse environmental impacts (which) magnifies the probability that a tragedy would ensue and the multiple mitigations that a developer would need to fulfill would cause development costs to soar. These factors make the sites unsuitable for affordable housing. The only acceptable course of action is to eliminate the sites from the inventory. Below is a list of the unique natural features, hazards, and limited resources in the Tam Valley, Almonte, and Manzanita lowlands that constrain development and population growth and substantiate our argument. For a quick overview of these constraints, please view the attached table. I. Dangerous Traffic with Unacceptable Level Of Service – LOS "F" Of Local Roadways:. II. Flooding, 100 Year Floodplain, Impending Sea Level Rise III. Filled Marsh Areas With High Seismic Activity, Liquefaction, Subsidence and Mud Displacement. IV. Air Quality & Noise: Increased Risk of Residents Developing Serious Illness Due to Living Near Major Roadways. V. Hazardous Materials: For additional information regarding potential health impacts to workers and future residents who may be exposed to hazardous soil conditions, related to past uses, in Tam Junction and Manzanita, please follow the below link to read the comment letter by Technical Expert Matt Hagemann. VI. Endangered Special Status Species. VII. Insufficient Services & Public Transit. VIII. Historic Wetlands and Baylands Corridor. IX. Historic Marshland That Could Be Restored. 160 Shoreline Hwy and 260 Redwood Hwy Frontage Rd. are historic marshland. X. High Density Development Is Not Consistent With the Traditional Character Of The Local Semi-Rural Communities. Conclusion: The County now has sufficient information to understand that the proposed Tam Valley, Almonte, and Manzanita Sites are inappropriate for inclusion in the 2023-2031 Housing Element Candidate Housing Sites Inventory. Not only would construction of housing on these sites exacerbate the already existing problems but doing so when the County admits in the Marin Countywide Plan EIR and 2012 Housing Element's FSEIR that significant adverse unavoidable impacts would result from such construction defies logic. Moreover, there can be no benefit that would override the impacts of environmental harm and severe illness, injury or loss of life from building on the Tam Valley, Almonte, and Manzanita Candidate Housing Sites, which are laden with environmental constraints and dangerous hazards. The best course of action would be for the County to revise the list to reflect the current problems with traffic, seismic activity, hazardous soil conditions, air and noise pollution, water supply, flooding, and impending sea level rise and to find that no new residential development in the Tam Junction & Manzanita areas is appropriate. Such action would be consistent with the Board of Supervisors' sensible decisions.	Email (See Email Comments Received.PDF, pp. 123-151)	X	X	X	X		X		X	X	X	X	X	X	X		
R18 - 375 Shoreline Highway (Tamalpais)	(Comment edited for length) Sustainable TamAlmonte has the following comments and recommendations regarding the merits of the above referenced Tam Valley, Almonte, and Manzanita Candidate Housing Sites listed in the 2023-2031 Housing Element DRAFT Candidate Housing Sites List. Due to the unique characteristics of the area, encouraging residential development, especially high-density development, at the above referenced Sites would increase the risk of undue harm to the environment and undue hardship, illness, injury and/or death to the current and future residents. The Tam Valley, Almonte, and Manzanita commercial lowlands, in which the above referenced sites are located, experience the most number of environmental constraints and hazards of any area in Unincorporated Marin. Both the Marin Countywide Plan's EIR and the 2012 Housing Element's SEIR demonstrate that development at these sites would exacerbate the existing dangerous conditions and add new significant adverse environmental impacts (which) magnifies the probability that a tragedy would ensue and the multiple mitigations that a developer would need to fulfill would cause development costs to soar. These factors make the sites unsuitable for affordable housing. The only acceptable course of action is to eliminate the sites from the inventory. Below is a list of the unique natural features, hazards, and limited resources in the Tam Valley, Almonte, and Manzanita lowlands that constrain development and population growth and substantiate our argument. For a quick overview of these constraints, please view the attached table. I. Dangerous Traffic with Unacceptable Level Of Service – LOS "F" Of Local Roadways:. II. Flooding, 100 Year Floodplain, Impending Sea Level Rise III. Filled Marsh Areas With High Seismic Activity, Liquefaction, Subsidence and Mud Displacement. IV. Air Quality & Noise: Increased Risk of Residents Developing Serious Illness Due to Living Near Major Roadways. V. Hazardous Materials: For additional information regarding potential health impacts to workers and future residents who may be exposed to hazardous soil conditions, related to past uses, in Tam Junction and Manzanita, please follow the below link to read the comment letter by Technical Expert Matt Hagemann. VI. Endangered Special Status Species. VII. Insufficient Services & Public Transit. VIII. Historic Wetlands and Baylands Corridor. IX. Historic Marshland That Could Be Restored. 160 Shoreline Hwy and 260 Redwood Hwy Frontage Rd. are historic marshland. X. High Density Development Is Not Consistent With the Traditional Character Of The Local Semi-Rural Communities. Conclusion: The County now has sufficient information to understand that the proposed Tam Valley, Almonte, and Manzanita Sites are inappropriate for inclusion in the 2023-2031 Housing Element Candidate Housing Sites Inventory. Not only would construction of housing on these sites exacerbate the already existing problems but doing so when the County admits in the Marin Countywide Plan EIR and 2012 Housing Element's FSEIR that significant adverse unavoidable impacts would result from such construction defies logic. Moreover, there can be no benefit that would override the impacts of environmental harm and severe illness, injury or loss of life from building on the Tam Valley, Almonte, and Manzanita Candidate Housing Sites, which are laden with environmental constraints and dangerous hazards. The best course of action would be for the County to revise the list to reflect the current problems with traffic, seismic activity, hazardous soil conditions, air and noise pollution, water supply, flooding, and impending sea level rise and to find that no new residential development in the Tam Junction & Manzanita areas is appropriate. Such action would be consistent with the Board of Supervisors' sensible decisions.	Email (See Email Comments Received.PDF, pp. 123-151)	X	X	X	X		X		X	X	X	X	X	X	X		

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R18 - 375 Shoreline Highway (Tamalpais)	(Comment edited for length) The Tam Design Review Board is charged with focusing on and supporting the provisions of the Tamalpais Area Community Plan (TACP). In addition to laying out a description of the appropriate character of the community, this plan clearly sets forth constraints specifying that environmental hazards must be taken into account in the site selection process. Indeed, this is also crucial for the viability of the adoption of the Housing Element itself. According to step #7 of the Housing Element's Site Identification Process: "Provide in the analysis a general description of any known environmental or other features (e.g., presence of floodplains, protected wetlands, oak tree preserves, very high fire hazard severity zones) that have the potential to impact the development viability of the identified sites..." p. 10. The TACP "places a strong emphasis on protecting the public safety and preserving the natural resources of the community, while still permitting individual property owners to realize reasonable development potentials" (pg. I-3). This balance is more critical today than it was in 1992 when the plan was written, with the risk of chronic flooding, impending sea level rise, and fire in the wildland-urban interface presenting an ever- greater peril to our neighborhoods. Tam Valley, Almonte, Homestead Valley, and Muir Woods Park are already viable and diverse neighborhoods, containing a range of housing from high-end single family residences to affordable apartments. Maintaining this diversity has long been a goal of the community, as expressed in Section I-C of the TACP. Added mixed use development in the Tam Junction area could, with proper planning and infrastructure update, provide needed housing which would have a minimal negative impact and enhance the community. The Housing Element should take a closer look at the potential for rezoning to achieve its goals. For those of lesser wealth to have access to the amenities available in the Tam Area, in particular good schools and proximity to jobs and open space, is a noble and important goal. There are a series of recent State laws that are aimed at helping to solve the housing crisis in California. Unfortunately, in its search for a solution to this crisis the legislature has crafted programs that offer density, height, and FAR incentives to housing developers in return for a very small number of "affordable" units without any appropriations for much needed transportation and infrastructure. There are likely to be many unintended consequences of these housing mandates which will be left to cities and counties to deal with. The most critical of these possible outcomes as they relate to the Tam area is the risk of fire and flooding and the already constricted evacuation routes in the face of such emergencies. Shoreline Highway in Tam Valley is where most of the proposed housing sites for our area lie. It is not hard to imagine the combination of a wildfire threat and high tide event occurring simultaneously, which would bring the evacuation of our entire area to a complete standstill and result in property damage and human fatalities. We further note that steadily increasing traffic impacts on Shoreline Highway from tourism continue to aggravate all these challenging conditions. While we applaud the careful consideration of available sites by MIG, as community volunteers appointed to research and uphold the values of the Tam Plan, we cannot in good conscience support the choice of the sites within our area without: 1) A detailed study of future traffic and its impacts on evacuation through Tam Junction and the Highway 101 on-ramp; 2) A careful analysis of the impact of new, medium or high-density housing on the Bothin Marsh and the risks of chronic flooding; 3) Development of a plan for Highway 1 at Manzanita and along Shoreline Highway to accommodate imminent sea level rise; and 4) Assurances that, if there is no way to avoid selecting housing sites in the Tam Plan area for development, the resulting housing will be protected from speculative investors and the potential to remove these future developments from the long-term rental market. The Tamalpais Area is so vulnerable to climate change disasters that, frankly, unless the housing built has a direct impact on resolving the housing crisis and addressing those most in need, new development will only intensify the crises of both climate risks and affordability. We understand the mandates from the State require you to make some challenging choices in selecting housing sites. In addition to placing questions of safety and environmental stewardship at the top of your agenda, we would like to suggest that you include in the current update of the Countywide Plan some further policies that will help guide County planning in the face of both State mandates and, if and when these mandates are modified, the undesirable results that might emerge. Please see the attached detailed list of policies	Email (See Email Comments Received.PDF, pp. 228-231)				X					X	X		X			X	
R18 - 375 Shoreline Highway (Tamalpais)	ATTACHMENT from Tam Design Review Board: Suggested Additional Policies to be Included in the Housing Element: 1. Wildfire Risk: Use mathematical modeling to investigate and predict wildfire risk. Prohibit the building of housing (even ADUs) in fire critical areas. 2. Flood Risk: Prohibit new housing in areas at risk of flooding from storm surge or sea level rise. 3. Bothin Marsh: Require all new development adjacent to Bothin Marsh to supplement and follow the policies that are designed to preserve the marsh. Given the County's recent efforts to restore and preserve the marsh, it makes no sense to select a site adjacent to the marsh for any form of dense development. 4. Evacuations: Require that new housing development along Shoreline Highway trigger a study and redesign of the traffic patterns to ensure that any new housing development in that area will not worsen traffic or increase the threat to life safety during an evacuation. Any assessment of traffic impacts of emergency evacuation should include new housing developments in the City of Mill Valley, as Shoreline Highway is the only exit should East Blithedale become blocked. 5. Short Term Rentals: Eliminate short-term rentals completely, or allow only on-site, owner-occupied properties to have short-term rentals. If someone does not live on-site, then the property is arguably an investment property only, and any claim of the need for that short-term rental income can be disregarded. This would enable ADUs to be counted toward the Housing Element numbers (see item #10). 6. Vacancies: Create a County mandated vacancy tax (as San Francisco is presently considering) to create disincentives for leaving housing units empty. Exemptions could be made for work from home or dwellings under a certain square footage if the homeowner works from home or needs the space for their own dwelling use. This has been documented to establish new housing units and therefore could be counted toward the housing numbers. 7. Speculative Investment: Eliminate corporate ownership of housing of up to 4 units. This will stop speculative over-bidding of properties (which drives up housing costs) and land banking (which is performed to drive up the value for the investors.) This is crucial for market rate units that do not have controls over ownership. If dwelling units are constructed and snatched up by corporate investors, the goal of increasing availability will not be achieved. If the housing crisis is still occurring after another eight years, the next round of RHNA numbers will be even higher, and even more density will be demanded. 8. Promote Affordability: Require that all lot splits and ADUs rent at affordable rates. This would enable ADUs to be counted toward the Housing Element numbers that are required for affordable units, which are the most difficult to achieve (see item #10). The Planning Department should not look at undersized parcels as a hardship that allows for an exemption to exceed the FAR. Instead, it should be taken as a limitation on the lot that will provide a smaller home, which will ultimately result in a diverse range of housing options and levels of affordability. 9. Conversions: Provide incentives to preserve the existing stock of affordable housing and/or promote the conversion of existing market rate housing to affordable housing. Tam Valley in particular has a large number of rental units which have traditionally been at the affordable end of the rental spectrum, and could readily be maintained as such with the necessary incentives. 10. Alternative Measures: Follow the Housing Element guidelines to promote and locate alternative housing sites as per recommended policies #5, 8, and 9 above. These guidelines state that acceptable dwelling unit numbers can be counted through "the availability of ADUs and JADUs for occupancy, rather than used as offices or guest houses." (p. 30) In addition: "Alternative adequate sites: Under limited circumstances, a local government may credit up to 25 percent of their adequate sites requirement per income category through existing units that will be: substantially rehabilitated in a multifamily rental or ownership housing complex of three or more units that are converted from non-affordable to affordable rental; preserved at levels affordable to low – or very low – income households, where the local government has provided those units with committed assistance." (p. 30)	Email				X					X	X		X			X	
R18 - 375 Shoreline Highway (Tamalpais)	I am writing to endorse the attached letter from Sustainable TamAlmonte to the Marin County Board of Supervisors and Planning Commission regarding the merits of the proposed Tam Valley, Almonte, and Manzanita Candidate Housing Sites listed in the 2023-2031 Marin County Housing Element DRAFT Candidate Housing Sites List. The need for housing our homeless is desperate but building residential space at Tam Junction is just NOT logical. The idea of building along Shoreling/ Highway 1 is very questionable. It is already a populated area with minimal sidewalks and access to needed resources. Thank you for your consideration of the attached letter	Email	X	X	X	X		X		X	X	X	X	X	X	X		

Location	Comment	Source	PCL	INF	SER	TRF	PRK	PTR	ACT	NMR	SEA	NAT	CUL	FIR	WAT	HLT	EQT	GDL
R18 - 375 Shoreline Highway (Tamalpais)	We are writing in regard to the sites chosen for possible inclusion into county plans for housing in the Almonte/Tam Valley area of the county. Of the eight sites mentioned in your Balancing Act scenario, five are in a serious flood zone and one is located, not on, but in Richardson's Bay. Your commentary regarding the avoidance of environmental hazards has been completely ignored by whatever staff was used to choose these sites. The properties in the flood zone are 160 Shoreline, assessor's parcel # 052-041-27, 217 Shoreline, 223 Shoreline, and 204 Flamingo Rd. he site which is actually in the bay is 260 Redwood Hwy. Oddly enough, there is one property across the road from 160 Shoreline which is on solid ground. That would be the Muir Woods Lodge, a motel which actually has some open space which could be used for more housing. Why was this property ignored when lesser properties were chosen? Considering that we are familiar with the sites in the Almonte/Tam Valley area but not the rest of the county, it seems very strange that your staff has chosen properties which flood now and will continue to flood even more in the future. We wonder about your motivation in focusing on dangerous and inappropriate land. We also wonder why your staff has chosen properties which are pretty much lumped together in the same area which will further exacerbate the level F traffic problems which occur for us every day. If these sites were chosen to be close to public transportation, we would remind you that there is no viable public transportation in our area. So we would be looking forward to much more daily auto traffic. We are extremely disappointed in the Balancing Act which appears to be a distraction and of no practical value. We wonder how much time and money was wasted on promoting this ridiculous game. We also wonder how many sites in the rest of the county are totally inappropriate but are being promoted as a way to choose our fate which, as you know, is not the case. Surely, the Board of Supervisors can do better than promoting this silly distraction rather than facing what is a serious problem for the future well being of Marin County.	Email				X		X			X							
R18 - 375 Shoreline Highway (Tamalpais)	We oppose new housing in the areas mentioned in Tam Junction due to flooding and traffic and possible fires, can't get out of here now. Tell Scott Wiener and his friends to move on.	Email				X					X			X				
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R19 - Tennessee Valley Road (Tamalpais)	(Comment edited for length) Sustainable TamAlmonte has the following comments and recommendations regarding the merits of the above referenced Tam Valley, Almonte, and Manzanita Candidate Housing Sites listed in the 2023-2031 Housing Element DRAFT Candidate Housing Sites List. Due to the unique characteristics of the area, encouraging residential development, especially high-density development, at the above referenced Sites would increase the risk of undue harm to the environment and undue hardship, illness, injury and/or death to the current and future residents. The Tam Valley, Almonte, and Manzanita commercial lowlands, in which the above referenced sites are located, experience the most number of environmental constraints and hazards of any area in Unincorporated Marin. Both the Marin Countywide Plan's EIR and the 2012 Housing Element's SEIR demonstrate that development at these sites would exacerbate the existing dangerous conditions and add new significant adverse environmental impacts (which) magnifies the probability that a tragedy would ensue and the multiple mitigations that a developer would need to fulfill would cause development costs to soar. These factors make the sites unsuitable for affordable housing. The only acceptable course of action is to eliminate the sites from the inventory. Below is a list of the unique natural features, hazards, and limited resources in the Tam Valley, Almonte, and Manzanita lowlands that constrain development and population growth and substantiate our argument. For a quick overview of these constraints, please view the attached table. I. Dangerous Traffic with Unacceptable Level Of Service – LOS "F" Of Local Roadways:. II. Flooding, 100 Year Floodplain, Impending Sea Level Rise III. Filled Marsh Areas With High Seismic Activity, Liquefaction, Subsidence and Mud Displacement. IV. Air Quality & Noise: Increased Risk of Residents Developing Serious Illness Due to Living Near Major Roadways. V. Hazardous Materials: For additional information regarding potential health impacts to workers and future residents who may be exposed to hazardous soil conditions, related to past uses, in Tam Junction and Manzanita, please follow the below link to read the comment letter by Technical Expert Matt Hagemann. VI. Endangered Special Status Species. VII. Insufficient Services & Public Transit. VIII. Historic Wetlands and Baylands Corridor. IX. Historic Marshland That Could Be Restored. 160 Shoreline Hwy and 260 Redwood Hwy Frontage Rd. are historic marshland. X. High Density Development Is Not Consistent With the Traditional Character Of The Local Semi-Rural Communities. Conclusion: The County now has sufficient information to understand that the proposed Tam Valley, Almonte, and Manzanita Sites are inappropriate for inclusion in the 2023-2031 Housing Element Candidate Housing Sites Inventory. Not only would construction of housing on these sites exacerbate the already existing problems but doing so when the County admits in the Marin Countywide Plan EIR and 2012 Housing Element's FSEIR that significant adverse unavoidable impacts would result from such construction defies logic. Moreover, there can be no benefit that would override the impacts of environmental harm and severe illness, injury or loss of life from building on the Tam Valley, Almonte, and Manzanita Candidate Housing Sites, which are laden with environmental constraints and dangerous hazards. The best course of action would be for the County to revise the list to reflect the current problems with traffic, seismic activity, hazardous soil conditions, air and noise pollution, water supply, flooding, and impending sea level rise and to find that no new residential development in the Tam Junction & Manzanita areas is appropriate. Such action would be consistent with the Board of Supervisors' sensible decisions.	Email (See Email Comments Received.PDF, pp. 123-151)	X	X	X	X		X		X	X	X	X	X	X	X		

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R19 - Tennessee Valley Road (Tamalpais)	(Comment edited for length) The Tam Design Review Board is charged with focusing on and supporting the provisions of the Tamalpais Area Community Plan (TACP). In addition to laying out a description of the appropriate character of the community, this plan clearly sets forth constraints specifying that environmental hazards must be taken into account in the site selection process. Indeed, this is also crucial for the viability of the adoption of the Housing Element itself. According to step #7 of the Housing Element's Site Identification Process: "Provide in the analysis a general description of any known environmental or other features (e.g., presence of floodplains, protected wetlands, oak tree preserves, very high fire hazard severity zones) that have the potential to impact the development viability of the identified sites..." p. 10. The TACP "places a strong emphasis on protecting the public safety and preserving the natural resources of the community, while still permitting individual property owners to realize reasonable development potentials" (pg. I-3). This balance is more critical today than it was in 1992 when the plan was written, with the risk of chronic flooding, impending sea level rise, and fire in the wildland-urban interface presenting an ever- greater peril to our neighborhoods. Tam Valley, Almonte, Homestead Valley, and Muir Woods Park are already viable and diverse neighborhoods, containing a range of housing from high-end single family residences to affordable apartments. Maintaining this diversity has long been a goal of the community, as expressed in Section I-C of the TACP. Added mixed use development in the Tam Junction area could, with proper planning and infrastructure update, provide needed housing which would have a minimal negative impact and enhance the community. The Housing Element should take a closer look at the potential for rezoning to achieve its goals. For those of lesser wealth to have access to the amenities available in the Tam Area, in particular good schools and proximity to jobs and open space, is a noble and important goal. There are a series of recent State laws that are aimed at helping to solve the housing crisis in California. Unfortunately, in its search for a solution to this crisis the legislature has crafted programs that offer density, height, and FAR incentives to housing developers in return for a very small number of "affordable" units without any appropriations for much needed transportation and infrastructure. There are likely to be many unintended consequences of these housing mandates which will be left to cities and counties to deal with. The most critical of these possible outcomes as they relate to the Tam area is the risk of fire and flooding and the already constricted evacuation routes in the face of such emergencies. Shoreline Highway in Tam Valley is where most of the proposed housing sites for our area lie. It is not hard to imagine the combination of a wildfire threat and high tide event occurring simultaneously, which would bring the evacuation of our entire area to a complete standstill and result in property damage and human fatalities. We further note that steadily increasing traffic impacts on Shoreline Highway from tourism continue to aggravate all these challenging conditions. While we applaud the careful consideration of available sites by MIG, as community volunteers appointed to research and uphold the values of the Tam Plan, we cannot in good conscience support the choice of the sites within our area without: 1) A detailed study of future traffic and its impacts on evacuation through Tam Junction and the Highway 101 on-ramp; 2) A careful analysis of the impact of new, medium or high-density housing on the Bothin Marsh and the risks of chronic flooding; 3) Development of a plan for Highway 1 at Manzanita and along Shoreline Highway to accommodate imminent sea level rise; and 4) Assurances that, if there is no way to avoid selecting housing sites in the Tam Plan area for development, the resulting housing will be protected from speculative investors and the potential to remove these future developments from the long-term rental market. The Tamalpais Area is so vulnerable to climate change disasters that, frankly, unless the housing built has a direct impact on resolving the housing crisis and addressing those most in need, new development will only intensify the crises of both climate risks and affordability. We understand the mandates from the State require you to make some challenging choices in selecting housing sites. In addition to placing questions of safety and environmental stewardship at the top of your agenda, we would like to suggest that you include in the current update of the Countywide Plan some further policies that will help guide County planning in the face of both State mandates and, if and when these mandates are modified, the undesirable results that might emerge. Please see the attached detailed list of policies	Email (See Email Comments Received.PDF, pp. 228-231)				X					X	X		X			X	

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R2 - North Knoll Road and St. Thomas Drive (Strawberry)	I am writing to request that Strawberry site R2 be removed from potential sites for high density housing. This site is not appropriate for high density housing. The Eagle Rock neighborhood already has traffic problems, and adding units will exacerbate those issues. This particular site is in an inaccessible extreme slope. Adding high density housing to this site will also destroy the family neighborhood surrounded by open space. Please consider repurposing more urban locations instead of paving over natural landscape.	Email				X						X						
R2 - North Knoll Road and St. Thomas Drive (Strawberry)	I live on Eagle Rock Rd. It is already congested. Traffic conditions on Tiburon Blvd at most times make it difficult to enter the Eagle Rock area. At the proposed location there is a 4 way intersection, providing access to a gas station, a multi tenant commercial building, access to N. Knoll with section 8 housing (which is very busy) and the residents and providers to my neighbors and me. The proposed site is on a steep hillside making it difficult to build. There is a bus stop at the base where N. Knoll empties onto Tiburon Blvd. This may be good for your concerns, but every day there are cars parked on lower Eagle Rock Rd. using free parking to access the bus service, many use it for longer term parking when traveling out of the area. Building more units on your proposed site will increase street parking. It always does. Your proposal will increase foot traffic crossing 4 lane Tiburon Blvd. We see pedestrians, daily, risking their lives crossing to go to Strawberry Shopping Center. Sure, there is a pedestrian crossing lane, but with the traffic they are not always visible to drivers. It's a scary operation trying to cross. The traffic entering onto Tiburon Blvd. from Hwy 101 is already congested. Then add the traffic coming up from Strawberry Shopping Center. Certain times of the day you already have to wait for more than one light to get through. It seems that California fire seasons are getting longer and more intense. We could have a real discussion on that, but that is the reality today. We are located down hill from large open spaces. Our evacuation points are in Strawberry and with massive traffic also evacuating from points toward Tiburon, it could be a real disaster. Development on this plot is not a good idea.	Email				X	X		X			X		X				
R2 - North Knoll Road and St. Thomas Drive (Strawberry)	Please start paying attention to the organizing activities of NIMBY -- Marin Against Density an anti-housing group because they are already fighting future development. .47 N Knoll Road where Kruger Pines Retirement home in Strawberry is located is about in the middle of this NOT COUNTY MAINTAINED Road. The part closest to where Eagle Roc and Bay Vista is in the 20s and the part closest to 70 N Knoll Road where the vacant lot is, is at the other side and Kruger Pines is in the middle. If this gets the green light for development then trucks for construction will be really destroying the road and it will take several years to get things completed too so please work on getting this road designation changed into county maintained road as part of the approval of the land development and have the whole road redone /paved when the development is completed. . I would love to see another senior/disabled housing development be built on this land along with workforce housing for teachers and first responders too. It would be wonderful to have this parcel developed to house more seniors born 1946-1964 and to have N Knoll Road become MAINTAINED as a county maintained road too because of all the potholes that are in the road now. I would like to submit this email letter to show my support for 70 N Knoll Road to be developed into affordable housing in the extremely low income, very low income, range of seniors 62+ who are falling into homelessness all the time now with greater frequency due to how low their social security is compared to what the rental rates are in Marin County. The teachers and first responders need housing too so please build housing for them also. 70 N Knoll Rd, Mill Valley, CA 94941 | Zillow: The vacant lot last sold on 2016-10-18 for $11,60000, with a recorded lot size of 6.12 acres	Email															X	X

MARIN COUNTY HOUSING ELEMENT: CANDIDATE HOUSING SITES AND SELECTION PROCESS
COMMENTS RECEIVED VIA EMAIL

Location	Comment	Source	PCL	INF	SER	TRF	PRK	PTR	ACT	NMR	SEA	NAT	CUL	FIR	WAT	HLT	EQT	GDL
R2 - North Knoll Road and St. Thomas Drive (Strawberry)	So evidently this vacant lot is being considered for building housing and NIMBY is already out against it ! Please start paying attention to the organizing activities of NIMBY -- Marin Against Density an anti-housing group because they are already fighting future development. .47 N Knoll Road where Kruger Pines Retirement home in Strawberry is located is about in the middle of this NOT COUNTY MAINTAINED Road. The part closest to where Eagle Roc and Bay Vista is in the 20s and the part closest to 70 N Knoll Road where the vacant lot is, is at the other side and Kruger Pines is in the middle. If this gets the green light for development then trucks for construction will be really destroying the road and it will take several years to get things completed too so please work on getting this road designation changed into county maintained road as part of the approval of the land development and have the whole road redone /paved when the development is completed. . I would love to see another senior/disabled housing development be built on this land along with workforce housing for teachers and first responders too. It would be wonderful to have this parcel developed to house more seniors born 1946-1964 and to have N Knoll Road become MAINTAINED as a county maintained road too because of all the potholes that are in the road now. I would like to submit this email letter to show my support for 70 N Knoll Road to be developed into affordable housing in the extremely low income, very low income, range of seniors 62+ who are falling into homelessness all the time now with greater frequency due to how low their social security is compared to what the rental rates are in Marin County. The teachers and first responders need housing too so please build housing for them also. 70 N Knoll Rd, Mill Valley, CA 94941 | Zillow: The vacant lot last sold on 2016-10-18 for $11,60000, with a recorded lot size of 6.12 acres	Email																X	X
R2 - North Knoll Road and St. Thomas Drive (Strawberry)	The access to the Eagle Rock Road area is already very difficult. The narrow street, especially on the lower exit side, is concerning should there be more development in the area. All it takes is one truck to completely block the exit path from this area. I am already concerned about getting out safely should a fire happen in this area which has high fire potential. With the steep hill median strip (that is constantly slipping in rain storms) there is nowhere to widen the road. These steep hillsides are not a good location for additional housing, especially multi-tenant housing. The current traffic backing up at the Tiburon Blvd/Blithedale exit is already a problem. Additional traffic at this location is not a good idea. Please remove sites R2 and R7.	Email				X				X				X				
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R20 - 260 Redwood Highway Frontage Road (Almonte)	(Comment edited for length) Sustainable TamAlmonte has the following comments and recommendations regarding the merits of the above referenced Tam Valley, Almonte, and Manzanita Candidate Housing Sites listed in the 2023-2031 Housing Element DRAFT Candidate Housing Sites List. Due to the unique characteristics of the area, encouraging residential development, especially high-density development, at the above referenced Sites would increase the risk of undue harm to the environment and undue hardship, illness, injury and/or death to the current and future residents. The Tam Valley, Almonte, and Manzanita commercial lowlands, in which the above referenced sites are located, experience the most number of environmental constraints and hazards of any area in Unincorporated Marin. Both the Marin Countywide Plan's EIR and the 2012 Housing Element's SEIR demonstrate that development at these sites would exacerbate the existing dangerous conditions and add new significant adverse environmental impacts (which) magnifies the probability that a tragedy would ensue and the multiple mitigations that a developer would need to fulfill would cause development costs to soar. These factors make the sites unsuitable for affordable housing. The only acceptable course of action is to eliminate the sites from the inventory. Below is a list of the unique natural features, hazards, and limited resources in the Tam Valley, Almonte, and Manzanita lowlands that constrain development and population growth and substantiate our argument. For a quick overview of these constraints, please view the attached table. I. Dangerous Traffic with Unacceptable Level Of Service – LOS "F" Of Local Roadways:. II. Flooding, 100 Year Floodplain, Impending Sea Level Rise III. Filled Marsh Areas With High Seismic Activity, Liquefaction, Subsidence and Mud Displacement. IV. Air Quality & Noise: Increased Risk of Residents Developing Serious Illness Due to Living Near Major Roadways. V. Hazardous Materials: For additional information regarding potential health impacts to workers and future residents who may be exposed to hazardous soil conditions, related to past uses, in Tam Junction and Manzanita, please follow the below link to read the comment letter by Technical Expert Matt Hagemann. VI. Endangered Special Status Species. VII. Insufficient Services & Public Transit. VIII. Historic Wetlands and Baylands Corridor. IX. Historic Marshland That Could Be Restored. 160 Shoreline Hwy and 260 Redwood Hwy Frontage Rd. are historic marshland. X. High Density Development Is Not Consistent With the Traditional Character Of The Local Semi-Rural Communities. Conclusion: The County now has sufficient information to understand that the proposed Tam Valley, Almonte, and Manzanita Sites are inappropriate for inclusion in the 2023-2031 Housing Element Candidate Housing Sites Inventory. Not only would construction of housing on these sites exacerbate the already existing problems but doing so when the County admits in the Marin Countywide Plan EIR and 2012 Housing Element's FSEIR that significant adverse unavoidable impacts would result from such construction defies logic. Moreover, there can be no benefit that would override the impacts of environmental harm and severe illness, injury or loss of life from building on the Tam Valley, Almonte, and Manzanita Candidate Housing Sites, which are laden with environmental constraints and dangerous hazards. The best course of action would be for the County to revise the list to reflect the current problems with traffic, seismic activity, hazardous soil conditions, air and noise pollution, water supply, flooding, and impending sea level rise and to find that no new residential development in the Tam Junction & Manzanita areas is appropriate. Such action would be consistent with the Board of Supervisors' sensible decisions.	Email (See Email Comments Received.PDF, pp. 123-151)	X	X	X	X		X		X	X	X	X	X	X	X		

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R20 - 260 Redwood Highway Frontage Road (Almonte)	(Comment edited for length) The Tam Design Review Board is charged with focusing on and supporting the provisions of the Tamalpais Area Community Plan (TACP). In addition to laying out a description of the appropriate character of the community, this plan clearly sets forth constraints specifying that environmental hazards must be taken into account in the site selection process. Indeed, this is also crucial for the viability of the adoption of the Housing Element itself. According to step #7 of the Housing Element's Site Identification Process: "Provide in the analysis a general description of any known environmental or other features (e.g., presence of floodplains, protected wetlands, oak tree preserves, very high fire hazard severity zones) that have the potential to impact the development viability of the identified sites..." p. 10. The TACP "places a strong emphasis on protecting the public safety and preserving the natural resources of the community, while still permitting individual property owners to realize reasonable development potentials" (pg. I-3). This balance is more critical today than it was in 1992 when the plan was written, with the risk of chronic flooding, impending sea level rise, and fire in the wildland-urban interface presenting an ever- greater peril to our neighborhoods. Tam Valley, Almonte, Homestead Valley, and Muir Woods Park are already viable and diverse neighborhoods, containing a range of housing from high-end single family residences to affordable apartments. Maintaining this diversity has long been a goal of the community, as expressed in Section I-C of the TACP. Added mixed use development in the Tam Junction area could, with proper planning and infrastructure update, provide needed housing which would have a minimal negative impact and enhance the community. The Housing Element should take a closer look at the potential for rezoning to achieve its goals. For those of lesser wealth to have access to the amenities available in the Tam Area, in particular good schools and proximity to jobs and open space, is a noble and important goal. There are a series of recent State laws that are aimed at helping to solve the housing crisis in California. Unfortunately, in its search for a solution to this crisis the legislature has crafted programs that offer density, height, and FAR incentives to housing developers in return for a very small number of "affordable" units without any appropriations for much needed transportation and infrastructure. There are likely to be many unintended consequences of these housing mandates which will be left to cities and counties to deal with. The most critical of these possible outcomes as they relate to the Tam area is the risk of fire and flooding and the already constricted evacuation routes in the face of such emergencies. Shoreline Highway in Tam Valley is where most of the proposed housing sites for our area lie. It is not hard to imagine the combination of a wildfire threat and high tide event occurring simultaneously, which would bring the evacuation of our entire area to a complete standstill and result in property damage and human fatalities. We further note that steadily increasing traffic impacts on Shoreline Highway from tourism continue to aggravate all these challenging conditions. While we applaud the careful consideration of available sites by MIG, as community volunteers appointed to research and uphold the values of the Tam Plan, we cannot in good conscience support the choice of the sites within our area without: 1) A detailed study of future traffic and its impacts on evacuation through Tam Junction and the Highway 101 on-ramp; 2) A careful analysis of the impact of new, medium or high-density housing on the Bothin Marsh and the risks of chronic flooding; 3) Development of a plan for Highway 1 at Manzanita and along Shoreline Highway to accommodate imminent sea level rise; and 4) Assurances that, if there is no way to avoid selecting housing sites in the Tam Plan area for development, the resulting housing will be protected from speculative investors and the potential to remove these future developments from the long-term rental market. The Tamalpais Area is so vulnerable to climate change disasters that, frankly, unless the housing built has a direct impact on resolving the housing crisis and addressing those most in need, new development will only intensify the crises of both climate risks and affordability. We understand the mandates from the State require you to make some challenging choices in selecting housing sites. In addition to placing questions of safety and environmental stewardship at the top of your agenda, we would like to suggest that you include in the current update of the Countywide Plan some further policies that will help guide County planning in the face of both State mandates and, if and when these mandates are modified, the undesirable results that might emerge. Please see the attached detailed list of policies	Email (See Email Comments Received.PDF, pp. 228-231)				X					X	X		X			X	
R20 - 260 Redwood Highway Frontage Road (Almonte)	As a concerned Mill Valley resident, I am writing to endorse TamAlmonte's letter to you re. the merits of Tam Valley, Almonte, & Manzanita Draft Candidate Housing Sites. Please think very carefully about sites, due to concerns about flooding, traffic and at times extreme fore danger with needed evacuation routes.	Email				X					X			X				
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R20 - 260 Redwood Highway Frontage Road (Almonte)	ATTACHMENT from Tam Design Review Board: Suggested Additional Policies to be Included in the Housing Element: 1. Wildfire Risk: Use mathematical modeling to investigate and predict wildfire risk. Prohibit the building of housing (even ADUs) in fire critical areas. 2. Flood Risk: Prohibit new housing in areas at risk of flooding from storm surge or sea level rise. 3. Bothin Marsh: Require all new development adjacent to Bothin Marsh to supplement and follow the policies that are designed to preserve the marsh. Given the County's recent efforts to restore and preserve the marsh, it makes no sense to select a site adjacent to the marsh for any form of dense development. 4. Evacuations: Require that new housing development along Shoreline Highway trigger a study and redesign of the traffic patterns to ensure that any new housing development in that area will not worsen traffic or increase the threat to life safety during an evacuation. Any assessment of traffic impacts of emergency evacuation should include new housing developments in the City of Mill Valley, as Shoreline Highway is the only exit should East Blithedale become blocked. 5. Short Term Rentals: Eliminate short-term rentals completely, or allow only on-site, owner-occupied properties to have short-term rentals. If someone does not live on-site, then the property is arguably an investment property only, and any claim of the need for that short-term rental income can be disregarded. This would enable ADUs to be counted toward the Housing Element numbers (see item #10). 6. Vacancies: Create a County mandated vacancy tax (as San Francisco is presently considering) to create disincentives for leaving housing units empty. Exemptions could be made for work from home or dwellings under a certain square footage if the homeowner works from home or needs the space for their own dwelling use. This has been documented to establish new housing units and therefore could be counted toward the housing numbers. 7. Speculative Investment: Eliminate corporate ownership of housing of up to 4 units. This will stop speculative over-bidding of properties (which drives up housing costs) and land banking (which is performed to drive up the value for the investors.) This is crucial for market rate units that do not have controls over ownership. If dwelling units are constructed and snatched up by corporate investors, the goal of increasing availability will not be achieved. If the housing crisis is still occurring after another eight years, the next round of RHNA numbers will be even higher, and even more density will be demanded. 8. Promote Affordability: Require that all lot splits and ADUs rent at affordable rates. This would enable ADUs to be counted toward the Housing Element numbers that are required for affordable units, which are the most difficult to achieve (see item #10). The Planning Department should not look at undersized parcels as a hardship that allows for an exemption to exceed the FAR. Instead, it should be taken as a limitation on the lot that will provide a smaller home, which will ultimately result in a diverse range of housing options and levels of affordability. 9. Conversions: Provide incentives to preserve the existing stock of affordable housing and/or promote the conversion of existing market rate housing to affordable housing. Tam Valley in particular has a large number of rental units which have traditionally been at the affordable end of the rental spectrum, and could readily be maintained as such with the necessary incentives. 10. Alternative Measures: Follow the Housing Element guidelines to promote and locate alternative housing sites as per recommended policies #5, 8, and 9 above. These guidelines state that acceptable dwelling unit numbers can be counted through “the availability of ADUs and JADUs for occupancy, rather than used as offices or guest houses.” (p. 30) In addition: “Alternative adequate sites: Under limited circumstances, a local government may credit up to 25 percent of their adequate sites requirement per income category through existing units that will be: substantially rehabilitated in a multifamily rental or ownership housing complex of three or more units that are converted from non-affordable to affordable rental; preserved at levels affordable to low – or very low – income households, where the local government has provided those units with committed assistance.” (p. 30)	Email				X					X	X		X			X	
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R20 - 260 Redwood Highway Frontage Road (Almonte)	I am writing to endorse the attached letter from Sustainable TamAlmonte to the Marin County Board of Supervisors and Planning Commission regarding the merits of the proposed Tam Valley, Almonte, and Manzanita Candidate Housing Sites listed in the 2023-2031 Marin County Housing Element DRAFT Candidate Housing Sites List. The need for housing our homeless is desperate but building residential space at Tam Junction is just NOT logical. The idea of building along Shoreling/ Highway 1 is very questionable. It is already a populated area with minimal sidewalks and access to needed resources. Thank you for your consideration of the attached letter	Email	X	X	X	X		X		X	X	X	X	X	X	X		
R20 - 260 Redwood Highway Frontage Road (Almonte)	The information lists only 1 Parcel, which is wrong - there are 3. It lists only 36 possible Housing units, which is wrong - it should be 36 units for Workforce or Senior units and 73 Hotel rooms, which is what the Tam Valley community Plan calls for on the larger Parcel. This site is located in the Manzanita area, not Almonte.	Email	X														X	

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R21 - 204 Flamingo Road (Tamalpais)	(Comment edited for length) The Tam Design Review Board is charged with focusing on and supporting the provisions of the Tamalpais Area Community Plan (TACP). In addition to laying out a description of the appropriate character of the community, this plan clearly sets forth constraints specifying that environmental hazards must be taken into account in the site selection process. Indeed, this is also crucial for the viability of the adoption of the Housing Element itself. According to step #7 of the Housing Element's Site Identification Process: "Provide in the analysis a general description of any known environmental or other features (e.g., presence of floodplains, protected wetlands, oak tree preserves, very high fire hazard severity zones) that have the potential to impact the development viability of the identified sites..." p. 10. The TACP "places a strong emphasis on protecting the public safety and preserving the natural resources of the community, while still permitting individual property owners to realize reasonable development potentials" (pg. I-3). This balance is more critical today than it was in 1992 when the plan was written, with the risk of chronic flooding, impending sea level rise, and fire in the wildland-urban interface presenting an ever- greater peril to our neighborhoods. Tam Valley, Almonte, Homestead Valley, and Muir Woods Park are already viable and diverse neighborhoods, containing a range of housing from high-end single family residences to affordable apartments. Maintaining this diversity has long been a goal of the community, as expressed in Section I-C of the TACP. Added mixed use development in the Tam Junction area could, with proper planning and infrastructure update, provide needed housing which would have a minimal negative impact and enhance the community. The Housing Element should take a closer look at the potential for rezoning to achieve its goals. For those of lesser wealth to have access to the amenities available in the Tam Area, in particular good schools and proximity to jobs and open space, is a noble and important goal. There are a series of recent State laws that are aimed at helping to solve the housing crisis in California. Unfortunately, in its search for a solution to this crisis the legislature has crafted programs that offer density, height, and FAR incentives to housing developers in return for a very small number of "affordable" units without any appropriations for much needed transportation and infrastructure. There are likely to be many unintended consequences of these housing mandates which will be left to cities and counties to deal with. The most critical of these possible outcomes as they relate to the Tam area is the risk of fire and flooding and the already constricted evacuation routes in the face of such emergencies. Shoreline Highway in Tam Valley is where most of the proposed housing sites for our area lie. It is not hard to imagine the combination of a wildfire threat and high tide event occurring simultaneously, which would bring the evacuation of our entire area to a complete standstill and result in property damage and human fatalities. We further note that steadily increasing traffic impacts on Shoreline Highway from tourism continue to aggravate all these challenging conditions. While we applaud the careful consideration of available sites by MIG, as community volunteers appointed to research and uphold the values of the Tam Plan, we cannot in good conscience support the choice of the sites within our area without: 1) A detailed study of future traffic and its impacts on evacuation through Tam Junction and the Highway 101 on-ramp; 2) A careful analysis of the impact of new, medium or high-density housing on the Bothin Marsh and the risks of chronic flooding; 3) Development of a plan for Highway 1 at Manzanita and along Shoreline Highway to accommodate imminent sea level rise; and 4) Assurances that, if there is no way to avoid selecting housing sites in the Tam Plan area for development, the resulting housing will be protected from speculative investors and the potential to remove these future developments from the long-term rental market. The Tamalpais Area is so vulnerable to climate change disasters that, frankly, unless the housing built has a direct impact on resolving the housing crisis and addressing those most in need, new development will only intensify the crises of both climate risks and affordability. We understand the mandates from the State require you to make some challenging choices in selecting housing sites. In addition to placing questions of safety and environmental stewardship at the top of your agenda, we would like to suggest that you include in the current update of the Countywide Plan some further policies that will help guide County planning in the face of both State mandates and, if and when these mandates are modified, the undesirable results that might emerge. Please see the attached detailed list of policies	Email (See Email Comments Received.PDF, pp. 228-231)				X					X	X		X			X	
R21 - 204 Flamingo Road (Tamalpais)	I am writing to endorse the attached letter from Sustainable TamAlmonte to the Marin County Board of Supervisors and Planning Commission regarding the merits of the proposed Tam Valley, Almonte, and Manzanita Candidate Housing Sites listed in the 2023-2031 Marin County Housing Element DRAFT Candidate Housing Sites List. The need for housing our homeless is desperate but building residential space at Tam Junction is just NOT logical. The idea of building along Shoreling/ Highway 1 is very questionable. It is already a populated area with minimal sidewalks and access to needed resources. Thank you for your consideration of the attached letter	Email	X	X	X	X		X		X	X	X	X	X	X	X		
R21 - 204 Flamingo Road (Tamalpais)	We are writing in regard to the sites chosen for possible inclusion into county plans for housing in the Almonte/Tam Valley area of the county. Of the eight sites mentioned in your Balancing Act scenario, five are in a serious flood zone and one is located, not on, but in Richardson's Bay. Your commentary regarding the avoidance of environmental hazards has been completely ignored by whatever staff was used to choose these sites. The properties in the flood zone are 160 Shoreline, assessor's parcel # 052-041-27, 217 Shoreline, 223 Shoreline, and 204 Flamingo Rd. he site which is actually in the bay is 260 Redwood Hwy. Oddly enough, there is one property across the road from 160 Shoreline which is on solid ground. That would be the Muir Woods Lodge, a motel which actually has some open space which could be used for more housing. Why was this property ignored when lesser properties were chosen? Considering that we are familiar with the sites in the Almonte/Tam Valley area but not the rest of the county, it seems very strange that your staff has chosen properties which flood now and will continue to flood even more in the future. We wonder about your motivation in focusing on dangerous and inappropriate land. We also wonder why your staff has chosen properties which are pretty much lumped together in the same area which will further exacerbate the level F traffic problems which occur for us every day. If these sites were chosen to be close to public transportation, we would remind you that there is no viable public transportation in our area. So we would be looking forward to much more daily auto traffic. We are extremely disappointed in the Balancing Act which appears to be a distraction and of no practical value. We wonder how much time and money was wasted on promoting this ridiculous game. We also wonder how many sites in the rest of the county are totally inappropriate but are being promoted as a way to choose our fate which, as you know, is not the case. Surely, the Board of Supervisors can do better than promoting this silly distraction rather than facing what is a serious problem for the future well being of Marin County.	Email				X		X			X							
R21 - 204 Flamingo Road (Tamalpais)	We oppose new housing in the areas mentioned in Tam Junction due to flooding and traffic and possible fires, can't get out of here now. Tell Scott Wiener and his friends to move on.	Email				X					X			X				
R21 - 204 Flamingo Road (Tamalpais)	Yesterday afternoon, I had the pleasure of speaking with Ms. Clark about the wisdom (actually, the lack of it) in the choice of potential sites around Tam Junction. Last night, I participated in the "roadshow" and, as a result, I am asking for your help in following up on one matter. During the presentation by Jose Rodriguez, he mentioned that one of the "Guiding Principles" for the BOS is the consideration of "environmental hazards". It doesn't take long to recognize the hazards of sea level rise, a long history of flooding and traffic in our neighborhood, among others. But, in addition, Mr. Rodriguez made an interesting rejoinder to a question about whether certain sites can be included in this study if such sites have been previously reviewed and rejected. He was not too clear but he suggested that the State of California has some "requirements" if a previously rejected site is again brought up for analysis. I asked him to specify (1) which of the four Tam Valley sites have already been considered and rejected, and (2) what are the state's requirements (if any)--that are different or additional--that would apply to such sites. He did not have the information available to answer either question and it didn't appear to me that there would be much of an effort to research those questions and disseminate the answers. Hence, this email. Do you know the answers? If not, would you please put in motion an effort to discover the answers? It may not be dispositive, but then again, it may be important.	Email				X					X	X						
R3 - 275 Olive Avenue (Blackpoint)	I wanted to share concerns about a proposed housing element on the corner of Olive avenue and Atherton (275 Olive Ave, currently a nursery). That site is a wet meadow and not an appropriate building location for a development of 50 homes. It is already subject to frequent flooding, is essentially sitting on top of a wetland nature preserve, and is basically at sea level. If you walk out there today, it is mostly under water. The inevitable sea level rise that will impact that spot makes it, and any other sites at that elevation, inappropriate for further development. Is it alright to ask why this parcel is being considered when these conditions are well known?	Email	X							X	X	X						
R3 - 275 Olive Avenue (Blackpoint)	The consideration of this site (275 Olive Avenue) raises a concern that other similarly inappropriate sites may also be up for consideration in other parts of Marin. Would it be possible to get a list of any sites that are within 500 feet of a wetland? I studied wetland habitat restoration planning in graduate school, and was under the impression that CEQA/CWA sect 404 prevented projects from being built on top of or close to wetlands.	Email										X						

MARIN COUNTY HOUSING ELEMENT: CANDIDATE HOUSING SITES AND SELECTION PROCESS
COMMENTS RECEIVED VIA EMAIL

Location	Comment	Source	PCL	INF	SER	TRF	PRK	PTR	ACT	NMR	SEA	NAT	CUL	FIR	WAT	HLT	EQT	GDL
R5 - 299 Olive Avenue (Blackpoint)	I am just finding out about the rezoning proposal along the Atherton corridor in Novato, and since I missed the meeting, I am writing to express my deepest concern as well as how much I am against this proposal. I live at the end of Olive Avenue, close to Atherton Ave, and have for almost 40 years. I have watched the impact just a few additional homes have had in this area. I am tremendously concerned about the wildlife, and how this proposal would jeopardize their well being. It would greatly impact their ability to access food and water. More homes means more traffic, which means more animals in danger of being struck by cars. There is already too much traffic for this corridor, and I am referring to Olive Avenue as well as Atherton Avenue. These areas cannot handle more housing! Please reconsider this proposal and keep the wildlife and our open spaces preserved.	Email				X				X		X						
R5 - 299 Olive Avenue (Blackpoint)	I am writing to express my opinion on the potential construction of hundreds of new housing units along the Atherton Avenue corridor to meet the county's state-mandated housing quotas. I urge you to redirect new high-density housing to more appropriate areas with better access and infrastructure and with less adverse impacts on wildlife and existing residents: It is not sensible to add large new sources of traffic congestion directly onto Atherton Avenue, the only conduit for evacuation from surrounding neighborhoods during fire emergencies. The proposed development will impact a rich and diverse wildlife population in the area, beyond just the destruction of habitat in the footprints of new construction. Increases in road traffic, noise, and other human activity will invariably take a toll. Foxes, opossums, and raccoons regularly transit my yard at night (I live off of Atherton Ave) and the semi-rural neighborhood environment also supports deer, wild turkeys, hawks, quail, squirrels, owls, turkey vultures and other animals. These populations are assets to the natural environment of Marin County and are all sensitive to human encroachment. The potential housing development is grossly uncharacteristic of the adjacent neighborhoods in terms of density and appearance. The proposed housing locations do not have walk-to shopping and other services, which I believe should be a top priority for siting new high-density housing. The Atherton corridor is a narrow strip with very limited road access: One way in from the west; one way in from the east, and one secondary access (Olive Ave) from the south. This situation is a natural consequence of the geographic boundaries along the corridor. Loading up this narrow space with more traffic, more parking needs, more water requirements, and more sewer infrastructure – when other options exist -- does not make sense.	Email		X	X	X				X		X		X	X			
R7 - Eagle Rock Road (Strawberry)	I live on Eagle Rock Rd. It is already congested. Traffic conditions on Tiburon Blvd at most times make it difficult to enter the Eagle Rock area. At the proposed location there is a 4 way intersection, providing access to a gas station, a multi tenant commercial building, access to N. Knoll with section 8 housing (which is very busy) and the residents and providers to my neighbors and me. The proposed site is on a steep hillside making it difficult to build. There is a bus stop at the base where N. Knoll empties onto Tiburon Blvd. This may be good for your concerns, but every day there are cars parked on lower Eagle Rock Rd. using free parking to access the bus service, many use it for longer term parking when traveling out of the area. Building more units on your proposed site will increase street parking. It always does. Your proposal will increase foot traffic crossing 4 lane Tiburon Blvd. We see pedestrians, daily, risking their lives crossing to go to Strawberry Shopping Center. Sure, there is a pedestrian crossing lane, but with the traffic they are not always visible to drivers. It's a scary operation trying to cross. The traffic entering onto Tiburon Blvd. from Hwy 101 is already congested. Then add the traffic coming up from Strawberry Shopping Center. Certain times of the day you already have to wait for more than one light to get through. It seems that California fire seasons are getting longer and more intense. We could have a real discussion on that, but that is the reality today. We are located down hill from large open spaces. Our evacuation points are in Strawberry and with massive traffic also evacuating from points toward Tiburon, it could be a real disaster. Development on this plot is not a good idea.	Email				X	X		X			X		X				
R7 - Eagle Rock Road (Strawberry)	The access to the Eagle Rock Road area is already very difficult. The narrow street, especially on the lower exit side, is concerning should there be more development in the area. All it takes is one truck to completely block the exit path from this area. I am already concerned about getting out safely should a fire happen in this area which has high fire potential. With the steep hill median strip (that is constantly slipping in rain storms) there is nowhere to widen the road. These steep hillsides are not a good location for additional housing, especially multi-tenant housing. The current traffic backing up at the Tiburon Blvd/Blithedale exit is already a problem. Additional traffic at this location is not a good idea. Please remove sites R2 and R7.	Email				X				X				X				
R7 - Eagle Rock Road (Strawberry)	The access to the Eagle Rock Road area is already very difficult. The narrow street, especially on the lower exit side, is concerning should there be more development in the area. All it takes is one truck to completely block the exit path from this area. We are already concerned about getting out safely should a fire happen in this area which has high fire potential. With the steep hill median strip (that is constantly slipping in rain storms) there is nowhere to widen the road. These steep hillsides are not a good location for additional housing, especially multi-tenant housing. The current traffic backing up at the Tiburon Blvd/Blithedale exit is already a problem. Additional traffic at this location is not a good idea. Please remove sites R2 and R7.	Email				X				X				X				
San Geronimo	(Comment edited for length)I attended the Wednesday evening presentation last week dealing with the State mandate for increasing housing in Marin. Clearly, you have been given a difficult task. Your introduction of the Guiding Principles and "explore strategies" was well done and appreciated. You answered most questions very well. Regretfully, time constraints didn't allow for in-depth responses and discussion. In every case, yours was the final comment and you, of necessity, moved on . . . I also wish there had been more time for comments. It was kind of you to stay later. That was appreciated and beneficial but some of us couldn't stay because we had another meeting to attend following your scheduled presentation.I have lived in the San Geronimo Valley (Lagunitas) for 60+ years. I was one of the leaders in the five year effort (1972 -77) to create a Community Plan that would preserve the Valley's rural character and natural resources and continue to be active. I was disappointed that so few homeowners from the Valley attended your presentation. Despite the county's efforts, I'm convinced that many Valley residents simply don't know about the current Plan and would be shocked to learn about it and its impact. We can rectify this problem. I request that you hold a meeting at the Lagunitas School multi-purpose room and make a presentation, with maps, and get one on one feedback from San Geronimo Valley residents and groups regarding recommendations and alternatives. In addition: I support the need for affordable housing in the San Geronimo Valley particularly for those with less than a moderate income. I support community involvement studying the issue of what, where, why and how (with the Community Plan as our guide) to deal with affordable housing in our valley, before providing any sites listing. Presbyterian Church - I cannot support the numbers proposed until I learn how much and where their property is located. Leelee and Staff: - The SGV Community Plan (CP) was developed by the Valley community over a five year period (1972 - 1977) with the help of CDA staff and adopted by the Board of Supervisors in 1977. Sections were updated in 1982. I was the CP Committee Chair for the Planning Group when we did a major/complete update in 1997. The Plans major goals have never changed -- keep the Valley rural and protect its natural resources! - See the CP pages IV-12: "Tamalpais Union High School Dist. The community would like to see this parcel remain in agricultural use." Many years ago, the Tam School Dist. needed funds and were considering selling the three undeveloped school properties they owned. They appointed a School Property Study Committee to make a recommendation composed of Kate Blickhahn - Drake High School administrator, Dale Elliott, a Forest Knolls resident and myself. The school board accepted our recommendation. They sold two school properties located in the eastern urbanized corridor and kept the Valley site for potential "agricultural use." I am not aware that their position has ever changed. Your job is to make recommendations to fulfill this new State imposed requirement. In that capacity, you need to be sure you are sensitive to every West Marin communities CP regarding their long held goals and objectives. Ours have been clearly stated in our CP since adoption in 1977. Any changes proposed must START with input from the community group that represent the community affected and come from the County working with that community. I am ccing Supervisor Rodoni and his aide Rhonda Kutter as I do not know if they are aware of some of the Valley's relevant history or the importance to Valley residents of preserving the "magical" view shed entry to our Valley "home." I look forward to working with Valley residents and you and your staff to protect and serve the San Geronimo Valley as we seek to implement changes	Email (See Email Comments Received.PDF, pp. 45-47)				X						X						X	
San Geronimo	Considering putting any housing on the site of the once San Geronimo golf course is wrong. It's too far out, creating more congestion on an already congested road. It also goes against the property zoning. In case of fire, ingress and egress would be even more impacted than it is now	Email				X								X				

Location	Comment	Source	PCL	INF	SER	TRF	PRK	PTR	ACT	NMR	SEA	NAT	CUL	FIR	WAT	HLT	EQT	GDL
Tam Valley / Almonte: Unknown-049-231-09-Marin Drive (3 Units)	(Comment edited for length) Sustainable TamAlmonte has the following comments and recommendations regarding the merits of the above referenced Tam Valley, Almonte, and Manzanita Candidate Housing Sites listed in the 2023-2031 Housing Element DRAFT Candidate Housing Sites List. Due to the unique characteristics of the area, encouraging residential development, especially high-density development, at the above referenced Sites would increase the risk of undue harm to the environment and undue hardship, illness, injury and/or death to the current and future residents. The Tam Valley, Almonte, and Manzanita commercial lowlands, in which the above referenced sites are located, experience the most number of environmental constraints and hazards of any area in Unincorporated Marin. Both the Marin Countywide Plan's EIR and the 2012 Housing Element's SEIR demonstrate that development at these sites would exacerbate the existing dangerous conditions and add new significant adverse environmental impacts (which) magnifies the probability that a tragedy would ensue and the multiple mitigations that a developer would need to fulfill would cause development costs to soar. These factors make the sites unsuitable for affordable housing. The only acceptable course of action is to eliminate the sites from the inventory. Below is a list of the unique natural features, hazards, and limited resources in the Tam Valley, Almonte, and Manzanita lowlands that constrain development and population growth and substantiate our argument. For a quick overview of these constraints, please view the attached table. I. Dangerous Traffic with Unacceptable Level Of Service – LOS "F" Of Local Roadways:. II. Flooding, 100 Year Floodplain, Impending Sea Level Rise III. Filled Marsh Areas With High Seismic Activity, Liquefaction, Subsidence and Mud Displacement. IV. Air Quality & Noise: Increased Risk of Residents Developing Serious Illness Due to Living Near Major Roadways. V. Hazardous Materials: For additional information regarding potential health impacts to workers and future residents who may be exposed to hazardous soil conditions, related to past uses, in Tam Junction and Manzanita, please follow the below link to read the comment letter by Technical Expert Matt Hagemann. VI. Endangered Special Status Species. VII. Insufficient Services & Public Transit. VIII. Historic Wetlands and Baylands Corridor. IX. Historic Marshland That Could Be Restored. 160 Shoreline Hwy and 260 Redwood Hwy Frontage Rd. are historic marshland. X. High Density Development Is Not Consistent With the Traditional Character Of The Local Semi-Rural Communities. Conclusion: The County now has sufficient information to understand that the proposed Tam Valley, Almonte, and Manzanita Sites are inappropriate for inclusion in the 2023-2031 Housing Element Candidate Housing Sites Inventory. Not only would construction of housing on these sites exacerbate the already existing problems but doing so when the County admits in the Marin Countywide Plan EIR and 2012 Housing Element's FSEIR that significant adverse unavoidable impacts would result from such construction defies logic. Moreover, there can be no benefit that would override the impacts of environmental harm and severe illness, injury or loss of life from building on the Tam Valley, Almonte, and Manzanita Candidate Housing Sites, which are laden with environmental constraints and dangerous hazards. The best course of action would be for the County to revise the list to reflect the current problems with traffic, seismic activity, hazardous soil conditions, air and noise pollution, water supply, flooding, and impending sea level rise and to find that no new residential development in the Tam Junction & Manzanita areas is appropriate. Such action would be consistent with the Board of Supervisors' sensible decisions.	Email (See Email Comments Received.PDF, pp. 123-151)	X	X	X	X		X		X	X	X	X	X	X	X		
Tam Valley / Almonte: Unknown-052-041-27-Shoreline Highway (12 Units)	(Comment edited for length) Sustainable TamAlmonte has the following comments and recommendations regarding the merits of the above referenced Tam Valley, Almonte, and Manzanita Candidate Housing Sites listed in the 2023-2031 Housing Element DRAFT Candidate Housing Sites List. Due to the unique characteristics of the area, encouraging residential development, especially high-density development, at the above referenced Sites would increase the risk of undue harm to the environment and undue hardship, illness, injury and/or death to the current and future residents. The Tam Valley, Almonte, and Manzanita commercial lowlands, in which the above referenced sites are located, experience the most number of environmental constraints and hazards of any area in Unincorporated Marin. Both the Marin Countywide Plan's EIR and the 2012 Housing Element's SEIR demonstrate that development at these sites would exacerbate the existing dangerous conditions and add new significant adverse environmental impacts (which) magnifies the probability that a tragedy would ensue and the multiple mitigations that a developer would need to fulfill would cause development costs to soar. These factors make the sites unsuitable for affordable housing. The only acceptable course of action is to eliminate the sites from the inventory. Below is a list of the unique natural features, hazards, and limited resources in the Tam Valley, Almonte, and Manzanita lowlands that constrain development and population growth and substantiate our argument. For a quick overview of these constraints, please view the attached table. I. Dangerous Traffic with Unacceptable Level Of Service – LOS "F" Of Local Roadways:. II. Flooding, 100 Year Floodplain, Impending Sea Level Rise III. Filled Marsh Areas With High Seismic Activity, Liquefaction, Subsidence and Mud Displacement. IV. Air Quality & Noise: Increased Risk of Residents Developing Serious Illness Due to Living Near Major Roadways. V. Hazardous Materials: For additional information regarding potential health impacts to workers and future residents who may be exposed to hazardous soil conditions, related to past uses, in Tam Junction and Manzanita, please follow the below link to read the comment letter by Technical Expert Matt Hagemann. VI. Endangered Special Status Species. VII. Insufficient Services & Public Transit. VIII. Historic Wetlands and Baylands Corridor. IX. Historic Marshland That Could Be Restored. 160 Shoreline Hwy and 260 Redwood Hwy Frontage Rd. are historic marshland. X. High Density Development Is Not Consistent With the Traditional Character Of The Local Semi-Rural Communities. Conclusion: The County now has sufficient information to understand that the proposed Tam Valley, Almonte, and Manzanita Sites are inappropriate for inclusion in the 2023-2031 Housing Element Candidate Housing Sites Inventory. Not only would construction of housing on these sites exacerbate the already existing problems but doing so when the County admits in the Marin Countywide Plan EIR and 2012 Housing Element's FSEIR that significant adverse unavoidable impacts would result from such construction defies logic. Moreover, there can be no benefit that would override the impacts of environmental harm and severe illness, injury or loss of life from building on the Tam Valley, Almonte, and Manzanita Candidate Housing Sites, which are laden with environmental constraints and dangerous hazards. The best course of action would be for the County to revise the list to reflect the current problems with traffic, seismic activity, hazardous soil conditions, air and noise pollution, water supply, flooding, and impending sea level rise and to find that no new residential development in the Tam Junction & Manzanita areas is appropriate. Such action would be consistent with the Board of Supervisors' sensible decisions.	Email (See Email Comments Received.PDF, pp. 123-151)	X	X	X	X		X		X	X	X	X	X	X	X		

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Unknown-049-231-09-Marin Drive (3 Units) (Tam Valley / Almonte)	(Comment edited for length) Sustainable TamAlmonte has the following comments and recommendations regarding the merits of the above referenced Tam Valley, Almonte, and Manzanita Candidate Housing Sites listed in the 2023-2031 Housing Element DRAFT Candidate Housing Sites List. Due to the unique characteristics of the area, encouraging residential development, especially high-density development, at the above referenced Sites would increase the risk of undue harm to the environment and undue hardship, illness, injury and/or death to the current and future residents. The Tam Valley, Almonte, and Manzanita commercial lowlands, in which the above referenced sites are located, experience the most number of environmental constraints and hazards of any area in Unincorporated Marin. Both the Marin Countywide Plan's EIR and the 2012 Housing Element's SEIR demonstrate that development at these sites would exacerbate the existing dangerous conditions and add new significant adverse environmental impacts (which) magnifies the probability that a tragedy would ensue and the multiple mitigations that a developer would need to fulfill would cause development costs to soar. These factors make the sites unsuitable for affordable housing. The only acceptable course of action is to eliminate the sites from the inventory. Below is a list of the unique natural features, hazards, and limited resources in the Tam Valley, Almonte, and Manzanita lowlands that constrain development and population growth and substantiate our argument. For a quick overview of these constraints, please view the attached table. I. Dangerous Traffic with Unacceptable Level Of Service – LOS "F" Of Local Roadways:. II. Flooding, 100 Year Floodplain, Impending Sea Level Rise III. Filled Marsh Areas With High Seismic Activity, Liquefaction, Subsidence and Mud Displacement. IV. Air Quality & Noise: Increased Risk of Residents Developing Serious Illness Due to Living Near Major Roadways. V. Hazardous Materials: For additional information regarding potential health impacts to workers and future residents who may be exposed to hazardous soil conditions, related to past uses, in Tam Junction and Manzanita, please follow the below link to read the comment letter by Technical Expert Matt Hagemann. VI. Endangered Special Status Species. VII. Insufficient Services & Public Transit. VIII. Historic Wetlands and Baylands Corridor. IX. Historic Marshland That Could Be Restored. 160 Shoreline Hwy and 260 Redwood Hwy Frontage Rd. are historic marshland. X. High Density Development Is Not Consistent With the Traditional Character Of The Local Semi-Rural Communities. Conclusion: The County now has sufficient information to understand that the proposed Tam Valley, Almonte, and Manzanita Sites are inappropriate for inclusion in the 2023-2031 Housing Element Candidate Housing Sites Inventory. Not only would construction of housing on these sites exacerbate the already existing problems but doing so when the County admits in the Marin Countywide Plan EIR and 2012 Housing Element's FSEIR that significant adverse unavoidable impacts would result from such construction defies logic. Moreover, there can be no benefit that would override the impacts of environmental harm and severe illness, injury or loss of life from building on the Tam Valley, Almonte, and Manzanita Candidate Housing Sites, which are laden with environmental constraints and dangerous hazards. The best course of action would be for the County to revise the list to reflect the current problems with traffic, seismic activity, hazardous soil conditions, air and noise pollution, water supply, flooding, and impending sea level rise and to find that no new residential development in the Tam Junction & Manzanita areas is appropriate. Such action would be consistent with the Board of Supervisors' sensible decisions.	Email (See Email Comments Received.PDF, pp. 123-151)	X	X	X	X		X		X	X	X	X	X	X	X		
Unknown-052-041-27-Shoreline Highway (12 Units) (Tam Valley / Almonte)	(Comment edited for length) Sustainable TamAlmonte has the following comments and recommendations regarding the merits of the above referenced Tam Valley, Almonte, and Manzanita Candidate Housing Sites listed in the 2023-2031 Housing Element DRAFT Candidate Housing Sites List. Due to the unique characteristics of the area, encouraging residential development, especially high-density development, at the above referenced Sites would increase the risk of undue harm to the environment and undue hardship, illness, injury and/or death to the current and future residents. The Tam Valley, Almonte, and Manzanita commercial lowlands, in which the above referenced sites are located, experience the most number of environmental constraints and hazards of any area in Unincorporated Marin. Both the Marin Countywide Plan's EIR and the 2012 Housing Element's SEIR demonstrate that development at these sites would exacerbate the existing dangerous conditions and add new significant adverse environmental impacts (which) magnifies the probability that a tragedy would ensue and the multiple mitigations that a developer would need to fulfill would cause development costs to soar. These factors make the sites unsuitable for affordable housing. The only acceptable course of action is to eliminate the sites from the inventory. Below is a list of the unique natural features, hazards, and limited resources in the Tam Valley, Almonte, and Manzanita lowlands that constrain development and population growth and substantiate our argument. For a quick overview of these constraints, please view the attached table. I. Dangerous Traffic with Unacceptable Level Of Service – LOS "F" Of Local Roadways:. II. Flooding, 100 Year Floodplain, Impending Sea Level Rise III. Filled Marsh Areas With High Seismic Activity, Liquefaction, Subsidence and Mud Displacement. IV. Air Quality & Noise: Increased Risk of Residents Developing Serious Illness Due to Living Near Major Roadways. V. Hazardous Materials: For additional information regarding potential health impacts to workers and future residents who may be exposed to hazardous soil conditions, related to past uses, in Tam Junction and Manzanita, please follow the below link to read the comment letter by Technical Expert Matt Hagemann. VI. Endangered Special Status Species. VII. Insufficient Services & Public Transit. VIII. Historic Wetlands and Baylands Corridor. IX. Historic Marshland That Could Be Restored. 160 Shoreline Hwy and 260 Redwood Hwy Frontage Rd. are historic marshland. X. High Density Development Is Not Consistent With the Traditional Character Of The Local Semi-Rural Communities. Conclusion: The County now has sufficient information to understand that the proposed Tam Valley, Almonte, and Manzanita Sites are inappropriate for inclusion in the 2023-2031 Housing Element Candidate Housing Sites Inventory. Not only would construction of housing on these sites exacerbate the already existing problems but doing so when the County admits in the Marin Countywide Plan EIR and 2012 Housing Element's FSEIR that significant adverse unavoidable impacts would result from such construction defies logic. Moreover, there can be no benefit that would override the impacts of environmental harm and severe illness, injury or loss of life from building on the Tam Valley, Almonte, and Manzanita Candidate Housing Sites, which are laden with environmental constraints and dangerous hazards. The best course of action would be for the County to revise the list to reflect the current problems with traffic, seismic activity, hazardous soil conditions, air and noise pollution, water supply, flooding, and impending sea level rise and to find that no new residential development in the Tam Junction & Manzanita areas is appropriate. Such action would be consistent with the Board of Supervisors' sensible decisions.	Email (See Email Comments Received.PDF, pp. 123-151)	X	X	X	X		X		X	X	X	X	X	X	X		
West Marin Coastal Area	The deadline for input is unrealistic and the tool is exceedingly difficult to use. I understand the County is under pressure to meet the State mandate, however this plan is like throwing darts at a map. It fails to address critical disaster planning in advance of determining even potential site selection. Responding to the coastal zone: I find it extremely distressing that with the impact of climate related severe fire risk, drought, resource depletion, traffic, parking, lack of sewer, emergency ingress/egress, etc., that we are considering adding increased density. The tool does not allow for pinpointing houses that sit empty, or the 600 plus vacation rentals in West Marin. I support accessibility to community based housing. If there were a severe limit placed on vacation rentals in the Coast Region, clawing back on permits/allowances, a number of livable units equal to the numbers proposed would be freed up. I have lived here for 40 plus years and have seen housing go the way of increased tourism, housing stock becoming vacation/business stock and 2nd home owners with frequently vacant homes. Until the Coastal Commission understands the risks involved to increased density and supports strict limitations to vacation units/business, the problem will persist no matter how many new units are introduced. It is unfortunate that it will likely take a fire storm / evacuation disaster to illustrate the hazards compounded by sheer numbers. My cottage on the Inverness Ridge burned in 95 and the risk then was a fraction of what it is today. Driving Sir Francis Drake on a usual busy weekend, or most days during the summer, is the equivalent of coastal gridlock. Adding more units at the bottom of White's Hill, Nicasio, Point Reyes, Olema, and Inverness is placing more people in vulnerable locations. Imagine residents trying, along with thousands of visitors, to flee during an inevitable disaster on a narrow artery. Stop vacation rentals; create incentives to convert empty living units to housing stock.	Email		X		X	X			X		X		X	X		X	
West Marin Coastal Area	The housing candidate sites for our Marin coastal villages are not suitable as these sites do not have jobs, public transit or community services please consider what doubling the population of these villages would mean to public safety when electricity is out our wells cannot pump water and the many propane tanks result in a hazardous mixture. Our aquifers are undoubtedly low after these droughts it will be a strain on our coastal communities to entertain a larger population many in our village are already renting their small units let's just let SB 9 do its job.	Email		X	X			X		X		X		X	X			

Location	Comment	Source	PCL	INF	SER	TRF	PRK	PTR	ACT	NMR	SEA	NAT	CUL	FIR	WAT	HLT	EQT	GDL
West Marin Coastal Area	The proposed development and locations designated for housing in unincorporated West Marin is ill-conceived and inappropriate. This appears to be a numbers game on the part of the County and outside, contracted MIG development agency. The plan lacks consideration for or understanding of natural resources, environmental hazards and the existing community. Communities around Tomales Bay are watershed areas with drainage into the vulnerable bay, creeks and streams, the salt marshes and wildlife habitats. The proposed Cottages building site is an environmental hazard to an already contaminated salt marsh and channel leading to Chicken Ranch Beach, Tomales Bay. As a result of previous inappropriate building and filling in a salt marsh, this has been an ongoing problem for many years. The site near Vladimir's restaurant, across from Dixon Marine, is directly across from Tomales Bay and almost at sea level. This area and the road can flood during a high tide or heavy rain, draining pollution into the bay. Also the proposed building would affect the small downtown of Inverness. West Marin is served by narrow, curving, two lane access roads. For Inverness there is only one road, in or out, a problem during flooding, fires, landslides and general overcrowding on weekends and holidays. These roads frequently need repair when lanes crumble into a creek, hillside or the bay. No freeways please, as was proposed in the 60s. I have lived in Inverness since the 70s. As a single working mother, a teacher, I raised my daughter in Inverness. Over the years I have seen families and friends move away as rentals, cottages and small units were converted to more lucrative Airbnbs and second homes. There are 4 houses around me with 2 units in each. Two are completely unoccupied. Two are rarely used by their absentee owners, leaving each second unit vacant. There are many houses like this in Inverness and far too many BnBs and other short term rentals. An absentee owner might purchase a house, spend an exorbitant amount of money improving it for short term rental or investment. Possible housing is currently available. West Marin already has serious problems related to climate change, as well as overcrowding, road congestion air and noise pollution from cars, sewage and, most obviously, water. Inverness is served by water storage tanks and is already predicted by IPUD to be more of a problem this year than last. Reservoirs dry up and water pipes only move water from one drought ridden area to another. Any development is a threat to our limited water supply. The arbitrary number of proposed building in these unincorporated areas of West Marin ignores the environment, nature and roads. The plan is insensitive to the existing communities and the influence of inappropriate, even hazardous, building.	Email				X					X	X		X	X			
Woodacre	There is a lot for sale as you enter Woodacre at the intersection of Park and Railroad (and an adjacent lot that is not for sale) that would be ideal for seniors with close access to post office and grocery store and bus stop.	Email															X	X

APPENDIX B: REVIEW OF 2015 HOUSING ELEMENT

Overview

Under State Housing Element law, communities are required to assess the achievements under their adopted housing programs as part of the periodic update to their housing elements. These results should be quantified where possible (e.g., the number of units rehabilitated), but may be qualitative where necessary (e.g., mitigation of governmental constraints). The results should then be compared with what was projected or planned in the earlier element. Where significant shortfalls exist between what was planned and what was achieved, the reasons for such differences must be discussed.

The County of Marin 2015-2023 Housing Element sets forth a series of housing programs with related goals for the following areas:

- Use Land Efficiently
- Meet Housing Needs Through a Variety of Housing Choices
- Ensure Leadership and Institutional Capacity

This section reviews the County's progress to date in implementing these housing programs and their continued appropriateness for the 2023-2031 Housing Element. Table B-1 summarizes the County's housing program accomplishments, followed by a review of its quantified objectives. The results of this analysis will provide the bases for developing the comprehensive housing program strategy for the 2023-2031 Element.

Cumulative Impacts on Addressing Housing for Special Needs

The County of Marin, including the Federal Grants Division, allocates funding for housing projects, including those for special needs populations. Many of the programs in the 2015-2023 Housing Element worked towards additional housing opportunities for seniors, agricultural workers, disabled residents, homeless persons, and others. Below are highlights of these efforts, while Table B-1 provides a thorough analysis of all Housing Element programs:

- The County dedicated $763,732 towards rehabilitation activities supporting 107 units of family housing across six development projects, including special needs individuals: a) $21,810 to support rehabilitation of an affordable senior housing development that currently serves some individuals with special needs; b) $396,371 towards the development of a new affordable housing complex for older

adults, including special needs individuals; and c) $30,922 towards home access modifications to allow people with disabilities to maintain living in their homes.

- Since the start of COVID-19 and subsequent shelter-in-place orders, Housing and Federal Grants staff have worked very closely with Health and Human Services staff in direct pandemic housing response around Marin's emergency motels, rental assistance and Homekey programs.
- The Housing and Federal Grants Division participates as a voting member in bimonthly Homeless Policy Steering Committee (HPSC) meetings. In 2020, local match funds of $2,395,000 were used to leverage $9,214,948 in State Homekey funding to acquire a former motel and commercial building to create 63 units of interim housing which will be converted to permanent supportive housing with wrap-around services earmarked for individual who have recently experienced homelessness.
- Housing and Federal Grants Division staff actively refer tenants in need of assistance making reasonable accommodation requests in the private housing market to the Marin Center for Independent Living (MCIL) and Fair Housing Advocates of Northern California (FHANC). FHANC received a $64,000 allocation to support its fair housing monitoring and assistance. It intervened on behalf of 42 households, requesting reasonable accommodations and succeeded in securing reasonable accommodation concessions in 33 of those cases.
- The County requires non-discrimination clauses in contracts to which it is a party.
- The County acquired the U.S. Coast Guard Facility in the fall of 2019. The 32-acre site contains 36 multi-bedroom housing units and other community facilities. In November 2019, the County released a Request for Proposals and Statement of Qualifications to convert the existing housing to affordable housing and implement a community vision and reuse plan. As part of this, the developer will create a set-aside to house agricultural workers and their families.
- Since adoption of the County's source of income ordinance to prevent discrimination against tenants with third-party housing vouchers, Housing and Federal Grants staff have dedicated resources to support incorporated jurisdictions with research and development of their own source of income protections.

For the sixth cycle Housing Element update, the County will expand opportunities for a range of housing types throughout the unincorporated areas. Programs to pursue funding, partnership with nonprofit developers, and code amendments to facilitate special needs housing are also included in the Housing Element update.

Table B-1: Evaluation of 2015-2023 Housing Element Programs

2015-2023 Housing Element Goal, Policy, or Program	Goal, Policy or Program	Achievements/ Results	Evaluation of Barriers to Implementations	Recommendations for the Housing Element Update
Goal 1	Use Land Efficiently	On-going		Carry forward as is
Program 1.a	Establish Minimum Densities on Housing Element Sites	Complete. Planners developed and routinely consult a Housing Element layer in the County's Geographic Information Systems (GIS) application for planning and land management; the Housing Element layer identifies the location of and expresses minimum densities for sites listed in the Site Inventory.	Successfully implemented	Carry forward as is
1.b	Evaluate Multi-family Land Use Designations	Complete. In 2020, Staff completed the Multi-Family Land Use Designation and Zoning Analysis Report and Multi-Family Zoning GIS Map, which was presented to the Board of Supervisors in January 2021.	Successfully implemented	Successfully completed, but additional revisions are being suggested for the 2023-2031 Housing Element.
1.c	Evaluate the Housing Overlay Designation	Partially Implemented. Achievement of this program is contingent upon an update to the General Plan.	Partially implemented	Review and update was initiated as part of the Housing Element update
1.d	Study Ministerial Review for Affordable Housing	In progress. In conjunction with its analysis and preparation of streamlined review procedures pursuant to SB 35, staff initiated an exploration of potential procedures to expedite review for affordable housing projects. Staff started working with consultants on Objective Design and Development Standards in collaboration with cities and towns to streamline the development of housing, including affordable housing in the fall of 2019. This study is in partnership with nine other jurisdictions in Marin County.	Partially implemented	AB 1397 requires that housing to be developed on reuse or rezone sites be provided ministerial review if the project includes 20% lower income units. This provision is included in the 2023-2031 Housing Element as part of the adequate sites project.
1.e.	Consider Adjustments to Second Unit Development Standards	Complete. In 2018, provisions were established for JADUs and waivers of certain fees for JADUs and ADUs. In 2020, the Board expanded the program; property owners can receive up to $10,000 in building permit fee waivers if they rent the second unit to a	Successfully implemented.	The 2023-2031 Housing Element includes a program to facilitate the development of Accessory Dwelling Units (ADUs) and

Table B-1: Evaluation of 2015-2023 Housing Element Programs

2015-2023 Housing Element Goal, Policy, or Program	Goal, Policy or Program	Achievements/ Results	Evaluation of Barriers to Implementations	Recommendations for the Housing Element Update
		household that earns below 80% area median income, up to $5,000 if rented to a household that earns between 80% and 120% area median income, and up $2,500 if rented at market-rate.		monitor the trend of development.
1.f	Review and Consider Updating Parking Standards	Completed. In December 2018, the Board of Supervisors adopted amendments to County parking standards to reduce parking space requirements for projects developed under the Housing Overlay Designation policy, in transit-rich areas, and for affordable housing developed near transit. The amendments also authorized tandem parking for certain residential uses.	Successfully implemented.	Additional revisions are being recommended in the 2023-2031 Housing Element.
1.g	Codify Affordable Housing Incentives Identified in the Community Development Element	The County authorizes waiver of Building and Planning permit fees and reimbursement of Environmental Health Service fees for affordable housing developments. The County's Mixed-Use Policy allows developments containing housing affordable to low- and very-low-income households to exceed a site's maximum Floor Area Ratio to accommodate the additional affordable units.	Successfully implemented.	2023-2031 Housing Element includes a new program for affordable housing incentives.
1.h	Promote Resource Conservation	Currently implementing a variety of programs including: - County works with and promotes the Bay Area Regional Energy Network's (RayREN) Single-Family and Multi-Family Energy Efficiency programs; - County operates its Green Building Program, which includes mandatory energy efficiency and green building measures for both new construction and remodel projects.	On-going	Programs offered by outside agencies are referenced in the 2023-2031 Housing Element as resources.

Table B-1: Evaluation of 2015-2023 Housing Element Programs

2015-2023 Housing Element Goal, Policy, or Program	Goal, Policy or Program	Achievements/ Results	Evaluation of Barriers to Implementations	Recommendations for the Housing Element Update
1.i	Consider Simplifying Review of Residential Development Project in Planned Districts	Completed. In March 2017, the Board of Supervisors amended the County Development Code to permit Master Plans to set ministerial development standards. The Board of Supervisors also approved modifications to planned zoning districts; the County now evaluates them through a more streamlined process of site review rather than full design review. In many cases, this change is anticipated to reduce time spent on review by 50% or more.	Successfully implemented.	Delete; successfully completed.
1.j	Consider Adjusting Height Limits for Multi-family Residential Buildings	Completed. County staff initiated a process to address this program as part of a broader set of Development Code amendments. The Development Code amendments allowed increased heights in both planned and conventional districts for multi-family housing.	Successfully implemented.	Additional revisions are being recommended in the 2023-2031 Housing Element.
1.k	Clarify Applicability of State Density Bonus	Not started. Implementation of this program requires CEQA review. To conserve resources, staff proposes to integrate evaluation of the State density bonus program with a forthcoming General Plan update, scheduled for initiation in late 2021.	Delay in implementation due to need for further analysis	Density bonus is incorporated in new program for facilitating affordable housing in the Housing Element update.
Goal 2	Meet Housing Needs Through a Variety of Housing Choices			Carry forward as is
Program 2.a	Encourage Housing for Special Needs Households	Currently implementing. Through the 2020 Community Development Block Grant (CDBG) and HOME Investment Partnerships Program (HOME) allocation process, the Housing Trust Fund, and Measure W funding the County dedicated $763,732 towards rehabilitation activities supporting 107 units of family housing across six development projects, including	On-going	The 2023-2031 Housing Element includes a program to address the provisions of other special needs housing such as Low Barrier Navigation Center (AB 101) and

Table B-1: Evaluation of 2015-2023 Housing Element Programs

2015-2023 Housing Element Goal, Policy, or Program	Goal, Policy or Program	Achievements/ Results	Evaluation of Barriers to Implementations	Recommendations for the Housing Element Update
		special needs individuals; $21,810 to support rehabilitation of an affordable senior housing development that currently serves some individuals with special needs; $396,371 towards the development of a new affordable housing complex for older adults, including special needs individuals; and $30,922 towards home access modifications to allow people with disabilities to maintain living in their homes.		Supportive Housing (AB 2162).
2.b	Enable Group Residential Care Facilities	Currently implementing. Small group homes, defined as those with six or fewer residents, are permitted by right in all residential zoning districts. Large group homes, defined as those with at least seven residents, may apply for a conditional use permit in any residential zoning district.	On-going	The 2023-2031 Housing Element includes an evaluation of the CUP findings required for large group residential care facilities.
2.c	Make Provisions for Multi-Family Housing Amenities	Currently implementing. The County prioritizes rental housing for families when making funding recommendations for HOME and CDBG funds. In 2020, the County allocated funding for the development, rehabilitation, or acquisition of 194 units of family housing using Housing Trust, CDBG and HOME funds.	On-going	The 2023-2031 Housing Element includes a program to facilitate housing for families.
2.d	Foster Linkages to Health and Human Services Programs	Currently implementing. Since the start of COVID-19 and subsequent shelter-in-place orders, Housing and Federal Grants staff have worked very closely with HHS staff in direct pandemic housing response around Marin's emergency motels, rental assistance and Homekey programs. Also see response to program 2.e, "support efforts to house the homeless."	On-going	The 2023-2031 Housing Element includes Project Homekey and linkage to other supportive programs.

Table B-1: Evaluation of 2015-2023 Housing Element Programs

2015-2023 Housing Element Goal, Policy, or Program	Goal, Policy or Program	Achievements/ Results	Evaluation of Barriers to Implementations	Recommendations for the Housing Element Update
2.e	Support Efforts to House the Homeless	Currently implementing. The Housing and Federal Grants Division participates as a voting member in bimonthly Homeless Policy Steering Committee (HPSC) meetings. Staff also participate in Opening Doors, an organization with a focus on solving chronic homelessness. In 2020, local match funds of $2,395,000 were used to leverage $9,214,948 in State Homekey funding to acquire a former motel and commercial building to create 63 units of interim housing which will be converted to permanent supportive housing with wraparound services earmarked for individual who have recently experienced homelessness.	On-going	These are modified and included in the 2023-2031 Housing Element.
2.f	Engage in a Countywide Effort to Address Homeless Needs	Currently implementing. See response to program 2.e, "support efforts to house the homeless."	On-going	These are modified and included in the 2023-2031 Housing Element.
2.g	Ensure Reasonable Accommodation	Partially completed. Housing and Federal Grants Division staff actively refer tenants in need of assistance making reasonable accommodation requests in the private housing market to the Marin Center for Independent Living (MCIL) and Fair Housing Advocates of Northern California (FHANC). Both organizations were supported in their work by CDBG funding. MCIL received a $30,922 allocation to its home modification program to fund alterations in homes occupied by low-income individuals with disabilities. FHANC received a $64,000 allocation to support its fair housing monitoring and assistance. It intervened on behalf of 42 households requesting reasonable accommodations and succeeded in	On-going	The 2023-2031 Housing Element includes a program to expedite Reasonable Accommodation requests.

Table B-1: Evaluation of 2015-2023 Housing Element Programs

2015-2023 Housing Element Goal, Policy, or Program	Goal, Policy or Program	Achievements/ Results	Evaluation of Barriers to Implementations	Recommendations for the Housing Element Update
		securing reasonable accommodation concessions in 33 of those cases.		
2.h	Require Non-discrimination Clauses	Currently implementing. The County requires non-discrimination clauses in contracts to which it is a party. Housing and Federal Grants staff developed an affirmative marketing tool and implemented a requirement for applicants requesting Federal Grants and Housing Trust Fund monies to submit affirmative marketing plans as part of their funding applications.	On-going	Included in the 2023-2031 Housing Element as part of the County's meaningful actions to affirmatively further fair housing.
2.i	Increase Tenant Protections	Currently implementing. To implement Ordinance 3705, a new landlord registry tool was developed to simplify the process for landlords subject to the ordinance to maintain registration of their properties. In 2020, staff completed a Landlord and Tenant Resources webpage. Since the start of the COVID-19 pandemic, staff have been monitoring State and Federal tenant protections and have brought forward local emergency Resolutions and Ordinances to meet community need.	On-going	Included in the 2023-2031 Housing Element as part of the County's meaningful actions to affirmatively further fair housing.
2.j	Promote the Development of Agricultural Worker Units in Agricultural Zones	Partially completed and on-going. The County acquired the U.S. Coast Guard Facility in the fall of 2019. The 32-acre site contains 36 multi-bedroom housing units and other community facilities. In November 2019, the County released a Request for Proposals and Statement of Qualifications to convert the existing housing to affordable housing and implement a community vision and reuse plan, as part of this, the developer will create a set-aside to house agricultural workers and their families.	On-going.	The 2023-2031 Housing Element includes a new program to facilitate affordable housing for agricultural workers and hospitality workers.

Table B-1: Evaluation of 2015-2023 Housing Element Programs

2015-2023 Housing Element Goal, Policy, or Program	Goal, Policy or Program	Achievements/ Results	Evaluation of Barriers to Implementations	Recommendations for the Housing Element Update
		CDA staff collaborated with Marin County University of California Cooperative Extension to develop streamlined permitting procedures for agricultural worker housing. CDA staff convenes the Agricultural Worker Housing Collaborative, which is currently working on a comprehensive study to understand the scope and needs for agricultural worker housing. In 2020, CDA staff began exploring the possible development of Agricultural Worker Housing on a County-owned site in Nicasio. To date, a Phase I study and biological assessment have been conducted on the site to help determine suitability for residential development.		
2.k	Promote and Ensure Equal Housing Opportunity	Currently implementing. The County AI was approved in 2020. With more than 1,400 interviews with individual residents and employees, staff developed a rigorous inventory and understanding of barriers to housing opportunity. Beginning in 2020, staff began participating in community conversations regarding the development of a Community Land Trust in Marin City, Marin's historically African American community. All housing providers that receive CDBG, HOME, and Housing Trust dollars from the County must provide an Affirmative Marketing Plan; see Program 2.h.	On-going	Included in the 2023-2031 Housing Element as part of the County's meaningful actions to affirmatively further fair housing.
2.l	Deter Housing Discrimination	Currently implementing. Since the adoption of the County's source of income ordinance to prevent	On-going	Included in the 2023-2031 Housing Element as part of

Table B-1: Evaluation of 2015-2023 Housing Element Programs

2015-2023 Housing Element Goal, Policy, or Program	Goal, Policy or Program	Achievements/ Results	Evaluation of Barriers to Implementations	Recommendations for the Housing Element Update
		discrimination against tenants with third-party housing vouchers, Housing and Federal Grants staff have dedicated resources to support incorporated jurisdictions with research and development of their own source of income protections. The Town of Fairfax, the City of Novato, the Town of San Anselmo, and the City of San Rafael adopted similar source of income ordinances. Staff continue to provide technical assistance and resources to other Marin jurisdictions. CDA staff continue to refer discrimination complaints to Fair Housing Advocates of Northern California or other appropriate legal services, County, or State agencies.		the County's meaningful actions to affirmatively further fair housing.
2.m	Implement the Inclusionary Housing Policy	Currently implementing. The County adjusts its in-lieu housing fee annually based on the higher of either the Consumer Price Index (CPI) for Shelter for the Construction Cost Index (CCI) published by the Engineering-News Record. See also response to program 2.n, "apply long-term housing affordability controls." In response to the Governor's approval of AB 1505, which renewed the County's authority to extend its inclusionary zoning policy to rental housing units, the Board adopted an amendment to its Development Code to renew that application of its inclusionary zoning policy to the rental housing development projects.	On-going	The 2023-2031 Housing Element includes a program to implement and modify the Inclusionary Housing policy.

Table B-1: Evaluation of 2015-2023 Housing Element Programs

2015-2023 Housing Element Goal, Policy, or Program	Goal, Policy or Program	Achievements/ Results	Evaluation of Barriers to Implementations	Recommendations for the Housing Element Update
		The County is working with other Marin Cities and Towns on updating their inclusionary programs, to provide more consistency across jurisdictions and to ensure that the policies are aligned with best practices and current market conditions.		
2.n	Apply Long-Term Housing Affordability Controls	Currently implementing. An affordable housing development's receipt of Marin Housing Trust Fund monies is typically contingent upon acceptance of a regulatory agreement that imposes affordability restrictions in perpetuity. Exceptions to this requirement are made only for projects with unavoidable constraints that preclude the developer's ability to accept those terms. Examples of such constraints include developments with a determinate term length for land or building leases or conflicts with terms of other sources of public financing.	On-going. The County requires long-term affordability restrictions on all inclusionary and funded units	Ongoing practice but is not included in the Housing Element as a separate housing program.
2.o	Encourage Land Acquisition and Land Banking	Currently implementing. Housing and Federal Grants Division staff participate in a committee of funders that seeks out and evaluates potential acquisitions of existing housing and other opportunities for maximizing affordable housing stock throughout the County. Also see response to program 2.e, "support efforts to house the homeless."	On-going.	The 2023-2031 Housing Element includes a program to maintain existing and create new Community Land Trusts.
2.p	Expedite Permit Processing of Affordable and Special Needs Housing Projects	Currently implementing. See response to program 1.d, "study ministerial review for affordable housing."	Limited success because of lack of affordable housing developments seeking permits	Modified in the 2023-2031 Housing Element to reflect AB 1397 requirements. Projects on rezone or reuse sites will be provided ministerial by-right approval if the project

Table B-1: Evaluation of 2015-2023 Housing Element Programs

2015-2023 Housing Element Goal, Policy, or Program	Goal, Policy or Program	Achievements/ Results	Evaluation of Barriers to Implementations	Recommendations for the Housing Element Update
				includes 20% lower income units.
2.q	Study Best Practices for Housing Choice Voucher Acceptance.	Currently implementing. In August 2018, the County executed a $450,000 contract with Marin Housing Authority to renew its Landlord Partnership Program for a second two-year period. The program incentivizes landlord participation in the Housing Choice Voucher program and provides security deposit assistance of tenants. The Landlord Partnership Program works in conjunction with the increasing number of sources of income ordinances within the County to increase success rates for voucher holders. In 2018, Marin Housing Authority reported a five percent increase in the success rate; it averaged roughly 60 percent throughout the year. Also see response to program 2.l, "deter housing discrimination."	On-going	Modified in the 2023-2031 Housing Element to include outreach and education regarding State source of income protection (SB 329 and SB 222), emphasizing new rental housing opportunities through ADUs and SB 9, and areas with disproportionate housing needs.
2.r	Encourage First Time Homebuyer Programs	Currently implementing. The Successor Agency to the Marin County Redevelopment Agency funds the Marin Housing Authority (MHA) Below Market Rate homeownership and down payment assistance programs for first-time homebuyers. MHA, Fair Housing Advocates of Northern California (FHANC), and Habitat for Humanity Greater San Francisco continue to coordinate and host first-time homebuyer readiness workshops and services.	On-going	Program included in the 2023-2031 Housing Element.

Table B-1: Evaluation of 2015-2023 Housing Element Programs

2015-2023 Housing Element Goal, Policy, or Program	Goal, Policy or Program	Achievements/ Results	Evaluation of Barriers to Implementations	Recommendations for the Housing Element Update
2.s	Link Code Enforcement with Public Information Programs	Currently implementing. County staff enforce housing, building, and fire codes to ensure compliance with basic health and safety building standards. Referrals to Marin Housing Authority's Rehabilitation Loan Program, affordable housing opportunities, and other services are provided as appropriate.	On-going	Program is modified in the 2023-2031 Housing Element to expand inspection scope.
2.t	Assist in Maximizing Use of Rehabilitation Programs	Currently implementing. The MHA Rehabilitation Loan program was allocated $230,095 in CDBG funds to support the provision of approximately 12 loans to low-, very-low-, and extremely-low-income homeowners in 2020. MHA staff routinely refer recipients of rehabilitation loans to the Green and Healthy Homes Initiative-Marin (GHHI), a collaborative consortium of service providers in Marin that provide housing health and sustainability interventions – including subsidies and rebate programs – for low-income residents.	On-going.	Program expanded to emphasize outreach in areas with disproportionate housing needs.
2.u	Monitor Rental Housing Stock	Currently implementing. Starting in 2019, landlords must report rents and general occupancy information for all rental properties subject to the Just Cause for Eviction ordinance. Housing and Federal Grants Division staff participate in an affordable-housing funders group (see response to program 2.o, "encourage land acquisition and land banking") and Opening Doors (see response to program 2.e, "support efforts to house the homeless"). The County Development Code prohibits conversion of multi-family rental units into condominiums unless the vacancy rate exceeds 5% and the change does not reduce the ratio of multi-family rental units to less		Included in the 2023-2031 Housing Element as part of the County's meaningful actions to affirmatively further fair housing, with increased monitoring in areas identified with displacement risks in the AFFH analysis.

Table B-1: Evaluation of 2015-2023 Housing Element Programs

2015-2023 Housing Element Goal, Policy, or Program	Goal, Policy or Program	Achievements/ Results	Evaluation of Barriers to Implementations	Recommendations for the Housing Element Update
		than 25% of the total number of dwelling units in the County. Also see response to program 2.n, "apply long-term affordability controls."		
2.v	Study Housing Needs and Constraints Specific to West Marin	In progress. In August 2018, the County elected to renew its financial, administrative and technical support of the Community Land Trust Association of West Marin's (CLAM) Real Community Rentals pilot program for a second two-year period. CLAM provides education, assistance with project management, and a screening and referral service to prospective landlords who agree to rent their units at rates affordable to low- and moderate-income households. In the fall of 2019, the Board of Supervisors authorized staff to enter into a purchase agreement for the Coast Guard property with the federal government. The agreement includes language that restricts the use of the 32-acre site to public benefit, which includes a conversion to affordable housing. A developer was selected for the project in April 2020. In 2019, $4,712,600, was allocated for the construction and preservation of 49 units of affordable housing, including the above-mentioned Coast Guard property.	In progress	Included in the 2023-2031 Housing Element as part of the County's meaningful actions to affirmatively further fair housing.
Goal 3	Ensure Leadership and Institutional Capacity			Carry forward as is

Table B-1: Evaluation of 2015-2023 Housing Element Programs

2015-2023 Housing Element Goal, Policy, or Program	Goal, Policy or Program	Achievements/ Results	Evaluation of Barriers to Implementations	Recommendations for the Housing Element Update
Program 3.a	Consider methods for improving County's outreach with respect to affordable housing	Currently implementing. The Housing and Federal Grants Division publishes staff reports in Spanish and ensures that Spanish interpretation services are made available at Board of Supervisors hearings. To make those hearings more accessible to working households, the Board of Supervisors often holds hearings related to affordable housing in the evening.	On-going.	Included in the 2023-2031 Housing Element as part of the County's meaningful actions to affirmatively further fair housing.
3.b	Advance Organizational Effectiveness	Currently implementing. Staff continues to coordinate with other agencies, divisions, and departments as is appropriate to support the accomplishment of intersectional programs and goals.	On-going. Staff has worked with other local governments and staff to address barriers to providing affordable homes in Marin	Ongoing staff function and is not included in the Housing Element as a separate program.
3.c	Provide and Promote Opportunities for Community Participation in Housing Issues	Currently implementing. Staff regularly gives presentations to community groups and conferences on affordable and fair housing issues. Also see response to program 3.a, "consider methods for improving County's outreach with respect to affordable housing."	On-going. Staff conducted an intensive outreach process to update the housing element, including hands-on interactive community workshops.	Included in the 2023-2031 Housing Element as part of the County's meaningful actions to affirmatively further fair housing. A new Community Engagement program is included in the Housing Element.
3.d	Coordinate with Regional Transportation and Housing Activities	Currently implementing. CDA works closely with the Transportation Authority of Marin (TAM) and the Association of Bay Area Governments (ABAG) to produce informative local data. Representatives from	On-going. Staff worked closely with Transportation Authority of Marin and will continue to	Staff function but not included in the Housing Element as a separate program.

Table B-1: Evaluation of 2015-2023 Housing Element Programs

2015-2023 Housing Element Goal, Policy, or Program	Goal, Policy or Program	Achievements/ Results	Evaluation of Barriers to Implementations	Recommendations for the Housing Element Update
		those agencies attend regular area planning director's meetings.	look for opportunities to coordinate with regional transportation agencies.	
3.e	Coordinate with Other Agencies	Currently implementing. Housing and Federal Grants Division staff coordinate with other agencies to facilitate the efficient processing of affordable and special needs housing applications in both the unincorporated county and the incorporated cities and towns. When project approvals require cooperation between departments, CDA staff facilitate expedition of permits and waiver of fees whenever possible and appropriate. To reduce funding barriers to affordable and special needs housing projects in incorporated cities and towns, the Board of Supervisors maintains a policy that it may support those projects through allocations of Marin Housing Trust Fund monies.	On-going	Staff function but not included in the Housing Element as a separate program.
3.f	Promote Countywide Collaboration on Housing	Currently implementing. Staff work with all towns and cities in Marin through the CDBG Priority Setting Committee (PSC) to fund affordable housing and ensure that jurisdictions affirmatively further fair housing. In 2020, staff continued to convene a countywide working group of planners to encourage interjurisdictional collaboration on housing issues and solutions, with a specific focus on responding to 2017 State housing Package. The working group established common goals and coordinated on housing legislation, planning, production, and	On-going	Staff function but not included in the Housing Element as a separate program.

Table B-1: Evaluation of 2015-2023 Housing Element Programs

2015-2023 Housing Element Goal, Policy, or Program	Goal, Policy or Program	Achievements/ Results	Evaluation of Barriers to Implementations	Recommendations for the Housing Element Update
		preservation of existing affordability. The working group applied jointly for SB2 planning grants in the summer and fall of 2019 and have started to collaborate on these grant projects including Objective Design and Development Standards, an ADU Workbook and Website, and Inclusionary housing program updates.		

Table B-2: Summary of RHNA Progress (2015-2021)

	Extremely Low Income	Very Low Income	Low Income	Moderate Income	Subtotal Affordable Units	Above Moderate Income	Total
Miscellaneous Housing Element Programs							
Accessory Dwelling Units	1	20	31	24	76	27	103
Attached and Detached Single Family Homes				1	1	140	141
Agricultural Worker Housing		7			7		7
Market Rate Rentals (Multi-Family)						3	3
Subtotal from Miscellaneous Housing Programs	*0*	*27*	*31*	*25*	*84*	*170*	*254*
Housing from Identified Sites							
Gates Cooperative[1]		2	7		9	1	10
Total Units	**1**	**29**	**38**	**25**	**93**	**171**	**264**
Regional Fair Share Housing Need 2015-2023	27	28	32	37	124	61	185
Percent of RHNA Met	>1%	103%	118%	68%	75%	280%	140%

1 Site identified in the 2015 Housing Element

Appendix C: Sites Inventory

A. Introduction

State law requires that jurisdictions demonstrate in the Housing Element that the land inventory is adequate to accommodate that jurisdiction's share of the region's projected growth. The County has available residential development opportunities with sufficient capacity to meet and exceed the identified housing need.

The following sections provide details on the County's 2023-2031 Housing Element sites inventory. The opportunity areas consist of proposed developments, vacant sites, and underutilized sites to accommodate the RHNA. The identified areas involve sites that can realistically be redeveloped with residential units during the planning period. The sites chosen are significantly underutilized given their size and location. As market forces continue to push toward higher densities, recycling of underutilized land is expected to occur at an increasing rate. If the trend continues, the County can anticipate increased recycling of land, particularly in higher-density areas where economies of scale can be realized.

Sites to Meet the RHNA

Site selection to meet the RHNA includes underutilized, vacant, and non-vacant sites.

Underutilized Sites

Underutilized sites included in this inventory have been chosen based on the potential capacity increase available to property owners and thus the ability to realize economic gain.

For large commercial shopping centers, sites have been identified by selecting areas that have the potential for housing development. Large parking areas or commercial buildings with vacancies were identified for redevelopment. Based on the developable areas, these sites were reduced in capacity to approximately 85%. This reduction allows for commercial uses to remain under mixed use development. Reduction capacity vary by each commercial center based on available developable areas.

Vacant and Non-Vacant Sites

Site vacancy is a criterion used in identifying sites with potential for new development or recycling opportunities. The following section describes the criteria used in determining the suitability of vacant/non-vacant sites.

Methodology in Identifying Sites

The County's RHNA for the 6th cycle Housing Element is accommodated primarily on non-vacant sites. Existing uses on the sites are older or show signs of disinvestment or deferred maintenance, indicating a "ripeness" for private redevelopment. Key sites with existing uses that are "ripe" for redevelopment typically contain older structures and are underutilized given the development potential afforded. Examples of existing uses include vacant commercial, office, and industrial buildings, and storage lots. Some sites with existing lower-density residential uses provide the opportunity for significant capacity increases.

Suitability of Sites

Underutilized sites included in this inventory have been chosen based on observable and well-established redevelopment trends of properties. As is demonstrated in Table C-1 below, the trends illustrate the potential capacity increase available to property owners and the owners actions to redevelop to take advantage of the underused capacity. Vacant lands sites are selected based on the limitation of environmental constraints. Underutilized sites consists of existing uses that are older or show signs of disinvestment or deferred maintenance, indicating a "ripeness" for private redevelopment. The current trends involving redevelopment of such sites are documented in Table C-1 and C-2 below and the comprehensive sites inventory table is included in this appendix.

Table C-1 below presents recent developments in the county to identify land uses that have recently been recycled for development and other development trends. Recently recycled land uses include industrial, commercial, office, storage, and residential uses. Other key metrics used to evaluate recent development projects include floor area ratio (FAR) as a proxy for building intensity, the building-to-land (BLV) ratio, and age of existing structures. In addition to the above metrics, developer/property owner interest to redevelop the site and parcel ownership were also taken into consideration when determining the suitability of sites. To ensure that appropriate sites have been chosen, properties that show recent investments or updates are not included, which tend to have a very high BLV ratio of 2.0 or higher.

Table C-1 on the following pages documents projects in Marin County that have recently been completed or entitled, on residentially zoned sites, and on sites that permit 100 percent commercial uses. Recent development projects show that development occurred on parcels with a FAR between 0.00–0.75, BLV ratio between 0.08–2.80 and building age between 28–122 years old; averages of the above metrics are 0.32, 1.17, and 68 respectively. The final metrics for determining the suitability of sites uses 75th percentile values to reduce the effect of outliers and account for a greater majority of available sites. These values are 0.40 FAR, 1.54 BLV, and buildings aged 50 years and above (year built >/= 1972).

All aforementioned considerations were then coded in Table C-4 (Detailed Site Inventory) to provide substantial evidence that existing land uses do not constitute an impediment for additional residential use on the sites (pursuant to Assembly Bill 1397). These criteria are:

Developer/Owner Interest or Limited Improvements on Site

1. **Interest**: Developer interest or property owner interest to redevelop site.
2. **Vacant/Minimal Improvements**: Vacant lots, Vacant lot, parking lots, or open storage that includes only minimal-to-no existing improvements on site.
3. **Public Ownership**: Property under county or state ownership

Characteristics of Existing Uses

4. **Existing Use**: Existing uses that are similar to uses that have been recycled (Industrial; Commercial; Office; Storages; Residential)
5. **Age**: Buildings 50 years and older (>/= 1972)
6. **Building Intensity** (Floor Area Ratio, FAR)[1]: Low existing FAR; 0.35 and under.
7. **Building/Land Value (BLV)**[2] **Ratio**: 1.54 and under

Sites that meet criteria **#1, #2, or #3,** or sites that meet two or more of the remaining four criteria **(#4 through #7)** are included in the sites inventory. There are no properties that meet all four of these remaining criteria on characteristics of existing uses on site.

These criteria have been applied across all income categories not just non-vacant sites identified to accommodate the lower-income RHNA. The information presented demonstrates that projects have been and will be built in all zones under a variety of conditions. Table C-4 indicates the factors that contributed to site redevelopment from the list above. These same factors are shown for each site in the sites inventory to justify its inclusion based on either similarities to approved/built projects, developer/property owner interest, or because a site is vacant.

Realistic Capacity

To determine realistic capacity assumptions for the county, recent development trends and their respective capacities were surveyed and the average calculated. Table C-2 presents the recent development projects surveyed with each project's theoretical and realistic capacity, as well as unit distributions per income level. The average realistic capacity for recent development projects is 85 percent of the theoretical capacity.

Many sites have been designated a Housing Overlay Designation (HOD) combining district zoning under the Marin County Development Code. The HOD combining district allows housing

[1] FAR = Floor-area ratio (building area/land area)
[2] BLV = assessed improvement value/assessed land value

development at a density reflective of recent development projects. The combining district is supplemental to the underlying zoning, which will remain unchanged. This approach allows for standalone housing development projects.

Consistent with HCD Guidelines, the methodology for determining realistic capacity on each identified site must also account for land use controls and site improvements.

- **Commercial Center Sites.** For large commercial center sites, the average realistic capacity of 45 percent was based on identifying developable areas of the site. These areas will allow for residential development from 30 to 45 dwelling units per acre.

- **Vacant Sites.** For many vacant sites, realistic capacity was determined by subtracting areas that are affected by natural resources, including wetlands and stream conservation areas, and as well as environmental constraints, including flooding, sea level rise, and steep terrain. For sites with steep terrain, the developable areas or flatter portions of the site were identified. On average, vacant site realistic capacity was calculated at 50 percent. The realistic capacity trend for building on steep terrain in Marin County is also 50 percent.

- **Religious Sites.** Religious institutions sites are sites with churches or other religious institutions, with excess vacant property or large parking lots, that could accommodate residential development. Only the portion of the vacant or parking area is used as a candidate housing site. All religious properties were reviewed. Sites with largest parking areas or surrounding vacant areas were selected or that could yield at least a half an acre when half of the property was calculated. In rural and inland areas, vacant lots appear to be used as parking areas. Half of the parking lot or vacant area (50 percent) were calculated toward housing units. Vacant areas with terrain constraints were either excluded or not selected from the analysis.

- **School Sites.** School sites with underutilized or unused areas or sites considered surplus by the school district that could accommodate residential development. Only the portion of the site considered underutilized or unused, or the entire “surplus” site, is considered a candidate housing site. Additionally, some school sites include buildings or recreational amenities that could or are currently being used as neighborhood amenities. These buildings and facilities were removed from the housing calculation analysis. Some school sites have development potential limited by environmental constraints such as flooding, sea level rise, and steep terrain. Based on existing environmental context and constraints, and to produce a realistic housing count, these sites were reduced in capacity by 50 percent and vary by each site.

- **Underutilized Nonresidential Sites.** For underutilized nonresidential sites, a realistic capacity of 75 percent was applied to sites based on the maximum allowed density based on recent trends and the assumption that development standards combined with unique site features may not always lead to 100 percent buildout.

The inventory includes sites that allow 100 percent nonresidential uses. The rationale for using such sites is threefold: 1) reduced demand for retail space due to internet sales, 2) decline in demand for office space due to COVID-19 impacts, and 3) a clearly increased observable demand for housing on all sites. The development applications and recently approved projects presented in Table C-2 illustrate a clear and overwhelming interest of commercial property owners to tear down all types of commercial buildings—various offices, hotels, furniture store, strip commercial centers, downtown retail buildings, and even a bowling alley—and replace them with housing of all types, including 100 percent affordable projects (e.g., Eden Housing in San Rafael). There are many examples of the trend of converting sites that allow 100 percent commercial and office to residential use are described in Table C-2 below.

As the discussion above indicates, of the 12 applications identified in Table C-2, six of them propose conversion of sites currently developed with a commercial use to high-density residential and mixed-use development. Moreover, of the 744 approved units shown in Table C-2, approximately 80 percent of those units are being built on properties that allow 100 percent commercial uses, with the remainder consisting of properties zoned high density residential (converting from lower-density or vacant land to higher-density developments). These data clearly

indicate trends of higher-density residential and mixed-use projects replacing existing commercial and office developments.

Table C-1 Recent Development Trends

APN	Project Name and Description	Zoning	Parcel Acreage	Existing FAR	Existing BLV	Year Built	Proposed Unit Distribution				Existing Use
							Lower	Mod	Above Mod	Total	
Novato											
141-282-07	First and Grant Mixed Use 1107 Grant Ave	CDR Downtown Core Retail	0.70	0.75	2.80	1907	6	26	0	32	Vacant industrial building; former Pini Hardware site
153-162-70	Landing Court Townhomes 101 Landing Court	CG General Commercial	2.00	0.0	0.08	1962	3	29	0	32	Recreational vehicle storage
San Rafael											
014-192-12	190 Mill St Homeward Bound of Marin (Non-Profit Shelter and Housing Program)	CCI/O – Core Canal Industrial/Office District	0.30	0.44	N/A	1900	32	0	0	32	Office building;
011-245-40	104 Shaver St	T4 Neighborhood 40/50	0.14	0.21	0.33	1948	1	0	6	7	Single-family unit
012-073-04	1309 Second St	T4 Neighborhood 40/50	0.08	0.35	0.66	1966	0	0	3	3	Single-family unit
179-064-01	Oakmont of San Rafael 3773 Redwood Highway Assisted Living Facility	GC General Commercial	1.29	0.38	0.88	1971	0	0	89	89	Commercial/ warehouse building (interior design)
011-232-10	21 G St	T4 Neighborhood 30/40	0.26	0.10	1.99	1947	1	0	7	8	Single-family unit
007-284-08	45 Ross Ave	R-3	0.40	0.35	0.44	1974	0	0	5	5	Single-family unit with detached garage and storage structure
007-211-20	16 Tamalpais Ave	P	0.17	0.23	1.42	1956	0	0	2	2	Single-family unit
006-091-39	754 Sir Francis Drake Blvd	C-L Limited Commercial	0.43	0.43	N/A	1994	2	0	14	16	Retail shopping center
025-182-13	Project Homekey 1591 Casa Buena Dr Permanent Supportive Housing	C-3 Highway Commercial	0.30	0.39	N/A	1948	18	0	0	18	Motel
002-112-13	6, 8, 10, 12 School Street Live/Work Units	Proposed: PDD Planned Development	1.90	0.22	1.92	1983	6	4	2	12	Retail shopping center
		Range		0.00 – 0.75	0.08 – 2.80	1900 – 1994					
		Average		0.32	1.17	1954					
		Criteria (75th Percentile)		0.40	1.54	1972					

Table C-2 Realistic Capacity Trends

APN	Project Name/Address	GP	Zoning	Existing Use	Parcel Acreage	Density (du/ac)	Theoretical Capacity	Proposed Unit Distribution			Realistic Capacity	Entitled Density (du/ac)	
								Lower	Mod	Above Mod			
San Rafael													
165-220-06 165-220-07	Los Gamos Road Terra Linda Apartments	Neighborhood Commercial MU	PD	Vacant	10.24	24.2	247	23	0	169	192	19	79%
008-082-52	3301 Kerner Eden Housing	Community Commercial MU	CCIO	Former Office Building	0.94	43.5	40	44	0	0	44	47	108%
008-092-02	88 Vivian Street	Neighborhood Commercial MU	NC	Bowling Alley	2.40	24.2	58	7	0	63	70	29	120%
179-041-27 179-041-28	350 Merrydale Road	Community Commercial MU	GC	Former Furniture Store	2.28	43.5	99	2	0	43	45	20	46%
178-240-21 178-240-17	Northgate Walk (1005/1010 Northgate Drive)	High Density Residential and Office	HR1	Hotel UPS Store	6.94 0.6	43.5	301	14	0	122	136	18	41%
011-245-40	104 Shaver Street	Downtown Mixed Use	T4N 40/50	SF House	0.14	43	6	1	0	6	7	50	116%
011-074-05 011-074-04	Between 1550 and 1554 Lincoln Avenue	High Density Residential	HR-1	Vacant	0.26	43.5	5	1	0	9	10	38.5	89%
Novato													
141-281-03	1301 Grant Avenue	Downtown Core	Downtown Core Retail	Office	0.15	23	3.45	0	0	3	3	20	87%
125-580-16 125-580-17	Verandah at Valley Oaks 7711 Redwood Blvd	Business & Professional Office; Affordable Housing Opportunity Overlay	Planned District; Affordable Housing Opportunity Overlay	Vacant	4.00	23	92	16	0	64	80	20	87%
125-600-51 125-600-52	Atherton Place 7533/7537 Redwood Blvd	Mixed Use	Planned District	Vacant	3.60	0.80 (FAR)	2.88 ac	0	0	50	50	0.59 (FAR) 13.9 du/ac	74%
141-282-07 141-282-04	First and Grant 1107 Grant Avenue	Downtown Core	Downtown Core Retail Downtown Novato Specific Plan Overlay	Vacant Downtown Retail Building and Parking Lot	0.85	2.00 (FAR)	1.7 ac	6		26	32	1.66 (FAR)	98%
157-970-03	Hamilton Village 802 State Access Road	Community Facilities	Planned District	Vacant	4.70	20	94	8	7	60	75	15.9	80%

Accommodating Lower Income Sites

Density

Sites within the County Center and Baylands Corridors use residential densities at 30 dwelling units per acre or higher and are credited toward lower-income housing sites. The County Centered and Baylands Corridors are generally located along Highway 101 and adjoining incorporated cities where employment, public services, and infrastructure is generally more available.

Sites within the Rural and Inland Corridors use residential densities at 20 dwelling units per acre and are credited toward lower-income housing sites. Due to limited infrastructure and wide use of septic tanks, development over a density of 20 dwelling units per acres is generally restrictive due to spacing requirements for drain or leach fields. Assembly Bill 1537 lowered Marin County's default density to 20 units per acre.

County Center and Baylands Corridors publicly owned sites use residential densities at 30 dwelling units per acre. Rural and Inland Corridors publicly owned sites use residential densities at 20 dwelling units per acre. A review was conducted on publicly owned sites to ensure development can occur during the planning period, and as such those sites were added the sites inventory. For example, some of the publicly owned sites only used the vacant area, such as Nicasio Corporation Yard. Sites that were deemed undevelopable or too environmentally constrained were removed entirely from the sites inventory.

Large and Small Sites

Consistent with updated Housing Element law (Assembly Bill 1397) related to the suitability of small and large sites, the lower-income sites inventory presented in this appendix is made up predominately of sites between 0.5 and 10 acres in size, as the State has indicated these size parameters are most adequate to accommodate lower-income housing need. Individual parcels under 0.5 acres in size are included only if they are part of a larger site based on common ownership.

Five sites over 10 acres in size are included in the inventory. In Marin County, development of lower income affordable housing on large sites is achievable and there is interest in redeveloping larger sites. Zoning amendments, including the designation of a HOD combining district zoning under Program 1 (Adequate Sites for RHNA and Monitoring of No Net Loss), have been applied to each larger property, limiting the residential development within the most developable areas of the properties due to constraints or other factors. In many cases, the limited developable area is under 10 acres. In San Rafael, the Northgate Mall is currently undergoing entitlements to overhaul the mall to include 1,320 residences on a 45-acre site. Nearly 10 percent of the housing units will be devoted to affordable housing.

- **Marin County Juvenile Hall.** The Marin County Juvenile Hall site consists of 33 acres and includes existing Probation Department facilities, Marin County offices, and an open recreational area. Marin County owns the site and facilities and will pursue affordable housing on a maximum of 10 acres of land on the site, while preserving recreational areas.

A HOD combining district zoning was applied to the property allowing for 20 dwelling units per acre limited to 2.7 acres only.

- **Nicasio Corporation Yard.** The Nicasio Corporation Yard is approximately 13.9 acres. As a County-owned site, the County recognizes the importance of adding affordable housing within the inlands areas of the County and will pursue such housing on this site. A HOD combining district zoning was applied to the property allowing for 20 dwelling units per acre limited to 0.8 acres only.

- **Marin Gateway Center.** Marin Gateway Center is located along Highway 101 near the Donahue Street/Bridge Boulevard and Bridgeway on/off ramps. The site, consisting of 15 acres, includes existing commercial and retail uses. An approximately 1.5-acre portion of parking area and potentially vacant retail spaces can accommodate housing on the site. A HOD combining district zoning was applied to the property allowing for 20 dwelling units per acre limited to 5.0 acres only.

- **San Domenico School.** The majority of the San Domenico School campus, over 522 acres, consists of school facilities and steep hillside terrain. There are a few areas of the school, each over 1 acre and less than 10 acres, that could allow for housing opportunities. A HOD combining district zoning was applied to the property allowing for 20 dwelling units per acre limited to 1.7 acres only.

- **St. Vincent's School for Boys.** This site consists of three properties totaling over 315 acres of land. Large swaths of the property are constrained by sea-level rise and a floodplain along Miller Creek. The existing Catholic Charities facilities, setbacks from Highway 101, and surrounding hillside terrain also limit the developable areas on this site significantly. Approximately 40 acres of the site may be available for housing development and other uses. The Built Environment Element of the Countywide Plan includes policy and requirements to provide affordable housing on this site. A HOD combining district zoning was applied to the property allowing for 20 dwelling units per acre limited to 34.0 acres only.

Parcel Listing of Sites

The sites inventory is shown in **Table C-4. Table C-3** shows a listing of the sites inventory by parcel broken down by unincorporated communities consistent with the level of analysis throughout the Housing Element. Unincorporated communities are made up by census designated places (CDPs) as delineated by the U.S. Census. Some sites do not fall within the boundaries of a CDP within an unincorporated community but fall within the larger County Communities (North Marin, West Marin, Central Marin, Southern Marin). These sites are categorized under an "Other" heading in **Table C-4**.

Table C-3: Unincorporated County CDPs by Community

Community Name	CDPs Included
North Marin	
Black Point-Greenpoint	Black Point – Green Point
Marinwood/ Lucas Valley	Lucas Valley-Marinwood
West Marin	
Northern Costal West Marin	Dillon Beach, Tomales
Central Coastal West Marin	Point Reyes Station, Inverness
The Valley	Nicasio, San Geronimo Valley, Woodacre, Lagunitas, Forest Knolls
Southern Coastal West Marin	Stinson Beach, Bolinas, Muir Beach
Central Marin	
Santa Venetia/ Los Ranchitos	Santa Venetia
Kentfield/Greenbrae	Kentfield
Southern Marin	
Strawberry	Strawberry
Tam Valley	Tamalpais-Homestead Valley
Marin County	Marin County

Table C-4: Residential Sites Inventory by Community (FINAL ADJUSTMENTS to Unit Counts)

Board of Supervisor District, Strategy, and Site Name	APN	Acres (Develop-able)	Address	Existing GP/Zoning	Density Allowance (du/ac)	Used in Previous HE?	Housing Units by RHNA Income Categories				Criteria and Status
							Lower	Moderate	Above Moderate	Total	
North Marin											
Blackpoint-Greenpoint											
Vacant Sites											
Vacant Blackpoint (Olive Ave)	143-110-31	55.1 (14.5)	300 Olive Ave, Blackpoint	SF3/ARP-2	4	No	0	0	58	58	**Meets Criteria #2, 7** Existing Use - Vacant; Building-to-Land Value Ratio: 0.00
Underutilized Sites											
Greenpoint Nursery	153-190-24	15.4 (3.5)	275 Olive Ave, Blackpoint	AG1/ARP-60	15	No	0	0	53	53	**Meets Criteria #2, 7** Existing Use - Wetlands/Vacant with nursery on corner; Building-to-Land Value Ratio: 0.00
Marinwood/Lucas Valley											
Commercial Center Mixed Use											
Marinwood Plaza	164-471-64	0.4	121 Marinwood Ave, Marinwood	GC/CP	30	4th & 5th	16	0	0	16	**Meets Criteria #4, 6, 7** Existing Use - Large format standalone commercial; GP Housing Overlay; Floor Area Ratio: 0.00; Building-to-Land Value Ratio: 0.00
	164-471-65	1.9	155 Marinwood Ave, Marinwood	GC/CP	30	4th & 5th	10	10	0	20	**Meets Criteria #4, 5** Existing Use - Grocery store, built 1959; GP Housing Overlay; Building-to-Land Value Ratio: 3.91
	164-471-69	1.1	175 Marinwood Ave, Marinwood	GC/CP	30	4th & 5th	43	0	0	43	**Meets Criteria #4, 5** Existing Use - Office park low, GP Housing Overlay; built 1962
	164-471-70	1.5	197 Marinwood Ave, Marinwood	GC/CP	30	4th & 5th	46	0	0	46	**Meets Criteria #4, 6, 7** Existing Use - Large format standalone commercial; GP Housing Overlay; Floor Area Ratio: 0.00; Building-to-Land Value Ratio: 1.54

Board of Supervisor District, Strategy, and Site Name	APN	Acres (Develop-able)	Address	Existing GP/Zoning	Density Allowance (du/ac)	Used in Previous HE?	Housing Units by RHNA Income Categories				Criteria and Status
							Lower	Moderate	Above Moderate	Total	
Miller Creek District Properties (Marinwood Plaza adjacent)	164-471-71	0.2	Marinwood Ave, Marinwood	GC/CP	30	4th & 5th	0	4	0	4	**Meets Criteria #2, 4** Existing Use - Storage facility; GP Housing Overlay
	164-471-72	0.3	Marinwood Ave, Marinwood	GC/CP	30	4th & 5th	0	6	0	6	**Meets Criteria #2, 4** Existing Use - Storage facility; GP Housing Overlay
Office Building (across from Juvenile Hall)	164-481-10	2.4	7 Mt Lassen Dr, Lucas Valley	GC/CP	25	No	58	0	0	58	**Meets Criteria #4, 6, 7** Existing Use – Office Park, Low; Floor Area Ratio: 0.310; Building-to-Land Value Ratio: 1.45
Public Sites											
Marin County Juvenile Hall	164-640-01	33.0 (10.0)	2 Jeannette Prandi Way, Lucas Valley	PF/PF	30	No	80	0	0	80	**Meets Criteria #2, 3** Existing Use - County juvenile hall facility, offices, and open field.
Other[3] - North Marin											
Vacant Sites											
Buck Center Vacant Property	125-180-79	97.3 (24.3)	Redwood Hwy, North Novato	AG1/A60	1	No	0	0	0	0	**Meets Criteria #2**
	125-180-85	136.5 (12.2)	Redwood Hwy, North Novato	AG1/A60	20	No	0	0	249	249	**Meets Criteria #2**
Underutilized Sites											
Atherton Corridor	143-101-35	1.0	761 Atherton Ave, North Novato	SF3/A2-B4	20	No	0	4	0	4	**Meets Criteria #4, 5, 7** Existing Use - Rural residential lot SF detached, built 1938; Building-to-Land Value Ratio - 0.52
Atherton Corridor	143-101-37	4.0	777 Atherton Ave, North Novato	SF3/A2-B4	20	No	30	8	0	38	**Meets Criteria # 4, 5, 7** Existing Use - Rural residential lot, SF detached; built 1932; Building-to-Land Value Ratio: 0.21
Atherton Corridor	143-101-20	4.8	791 Atherton Ave, North Novato	SF3/A2-B4	20	No	37	13	0	50	**Meets Criteria #4, 6, 7** Existing Use - Rural residential lot, SF detached; built 1926; Building-to-Land Value Ratio: 0.54

[3] Sites that did not fall within the boundaries of CDPs within unincorporated communities in North Marin (Black Point – Green Point or Marinwood- Lucas Valley) but are located in North Marin.

Board of Supervisor District, Strategy, and Site Name	APN	Acres (Develop-able)	Address	Existing GP/Zoning	Density Allowance (du/ac)	Used in Previous HE?	Housing Units by RHNA Income Categories				Criteria and Status
							Lower	Moderate	Above Moderate	Total	
Atherton Corridor	143-101-17	5.6	805 Atherton Ave, North Novato	SF3/A2-B4	20	No	42	13	0	55	**Meets Criteria #4, 5, 7** Existing Use - Rural residential lot, SF detached; built 1939; Building-to-Land Value Ratio: 0.04
West Marin											
Northern Coastal West Marin (Dillon Beach, Tomales)											
Vacant Sites											
Vacant Tomales	102-075-06	0.3	Shoreline Hwy, Tomales	C-NC/C-VCR-B1	20	No	0	0	6	6	**Meets Criteria #2**
	102-075-07	0.1	Shoreline Hwy, Tomales	C-NC/C-VCR-B1	20	No	0	0	2	2	**Meets Criteria #2**
Vacant Tomales	102-062-03 102-062-04	0.7	Dillon Beach Rd, Tomales	C-SF6/C-RSP-7.26	7	No	0	0	4	4	**Meets Criteria #2**
Vacant Tomales	102-075-02	0.3	Shoreline Hwy, Tomales	C-NC/C-VCR-B1	20	No	0	0	5	5	**Meets Criteria #2**
Vacant Tomales	102-041-44	4.8	290 Dillon Beach Rd, Tomales	C-SF6/C-RSP-7.26	3	No	0	0	13	13	**Meets Criteria #2**
Religious Sites											
Tomales Catholic Church	102-080-23	2.0	26825 State Route 1, Tomales	C-NC/C-VCR-B1	7	No	0	13	0	13	**Meets Criteria #2, 7** Existing Use – Religious center (Parking Lot); Building-to-Land Value Ratio: 0.62
Underutilized Sites											
Tomales Nursery	102-051-09	0.3	27235 State Route 1	C-NC/C-VCR-B1	10	No	0	0	3	3	**Meets Criteria #4, 7** Existing Use - Low intensity strip commercial; Building-to-Land Value Ratio: 0.16
	102-051-08	0.3	27235 State Route 1	C-NC/C-VCR-B1	10	No	0	0	3	3	**Meets Criteria #5, 7** Existing Use - Estate lot SF detached, built 1931; Building-to-Land Value Ratio: 0.59
Tomales Underutilized	102-051-07	0.6	200 Valley Ave, Tomales	C-NC/C-VCR-B1	10	No	0	0	6	6	**Meets Criteria #4, 7**

Board of Supervisor District, Strategy, and Site Name	APN	Acres (Develop-able)	Address	Existing GP/Zoning	Density Allowance (du/ac)	Used in Previous HE?	Housing Units by RHNA Income Categories				Criteria and Status
							Lower	Moderate	Above Moderate	Total	
											Existing Use - Rural residential lot SF detached, built 1990; Building-to-Land Value Ratio: 0.59
Tomales Underutilized	102-075-09	0.5	29 John St, Tomales	C-NC/C-VCR-B1	10	No	0	0	5	5	**Meets Criteria #4, 5, 7** Existing Use - Rural residential lot SF detached, built 1924; Building-to-Land Value Ratio: 0.22
Central Coastal West Marin (Point Reyes Station, Inverness)											
Underutilized Sites											
Pt. Reyes Village (5th St)	119-222-08	1.0	60 Fifth St, Pt. Reyes Station	C-SF3/C-RSP-1	20	No	17	0	0	17	**Meets Criteria #4, 5, 7** Existing Use - Low intensity strip commercial; built 1953; Building-to-Land Value Ratio: 0.68
Pt. Reyes Village Red/Green Barn	119-198-05 119-198-04	1.5	510 Mesa Rd, Pt. Reyes Station	C-NC/C-VCR-B2	20	No	24	0	0	24	**Meets Criteria #2, 7** Existing Use – Barn; Building-to-Land Value Ratio: 0.82
Public Sites											
Pt. Reyes County Vacant Site	119-260-03	2.0	9 Giacomini Rd, Pt. Reyes Station	C-NC/C-RMPC	20	No	32	0	0	32	**Meets Criteria #2, 3** Existing Use – Vacant County site
	119-270-12	0.3	10 Giacomini Rd, Pt. Reyes Station	C-NC/C-RMPC	20	No	5	0	0	5	**Meets Criteria #2, 3** Existing Use – Vacant County site
Pt. Reyes Coast Guard Rehabilitation/Conversion	119-240-73	31.4	100 Commodore Webster Dr, Pt. Reyes Station	C-OA/C-OA	0	No	50	0	0	50	**Meets Criteria #2, 3** Existing Use - Military
Rehabilitation Sites											
Grandi Building/Site	119-234-01	2.5	54 B ST, Pt. Reyes Station	C-NC/C-VCR-B2	20	4th & 5th	21	0	0	21	**Meets Criteria #4, 5** Existing Use - Large format standalone commercial (vacant); built 1914; Potential rehabilitation of historic building

Board of Supervisor District, Strategy, and Site Name	APN	Acres (Develop-able)	Address	Existing GP/Zoning	Density Allowance (du/ac)	Used in Previous HE?	Housing Units by RHNA Income Categories				Criteria and Status
							Lower	Moderate	Above Moderate	Total	
Religious Sites											
Presbytery of the Redwoods	119-202-05	0.6	11445 State Route 1, Pt. Reyes Station	C-SF4/C-RA-B3	15	No	0	3	0	3	**Meets Criteria #2** Existing Use - Religious center (parking lot only)
Vacant Sites											
Vacant Pt. Reyes Station	119-203-01	0.1	Mesa Rd, Pt. Reyes Station	C-NC/C-VCR-B2	20	No	0	0	2	2	**Meets Criteria #2**
	119-203-03	0.1	Mesa Rd, Pt. Reyes Station	C-NC/C-VCR-B2	20	No	0	0	2	2	**Meets Criteria #2**
The Valley (Nicasio, San Geronimo Valley, Woodacre, Lagunitas, Forest Knolls)											
Rehabilitation Sites											
Office - Forest Knolls (Upper Floors)	168-141-12	0.1	6900 Sir Francis Drake Blvd, Forest Knolls	NC/VCR	20	No	0	0	2	2	**Meets Criteria #4, 5, 7** Existing Use - Low intensity strip commercial, built 1938; Building-to-Land Value Ratio: 0.65
Office - Lagunitas (Upper Floors and Rear Prop)	168-175-06	0.9	7120 Sir Francis Drake Blvd, Lagunitas	GC/H1	20	No	16	0	0	16	**Meets Criteria #4, 6** Existing Use - Large format standalone commercial; Floor Area Ratio: 0.18
Office - Lagunitas (Upper Floors and Rear Prop)	168-192-28	1.3	7282 Sir Francis Drake Blvd, Lagunitas	GC/CP	20	No	0	10	4	14	**Meets Criteria #4, 5, 7** Existing Use - Commercial recreation facility; built 1925; Building-to-Land Value Ratio: 0.90
Religious Sites											
Saint Cecilia Church	168-183-04	0.9	428 W. Cintura, Lagunitas	SF4/R1-B3	20	No	16	0	0	16	**Meets Criteria #2** Existing Use - Religious center (Parking Lot Only)
Presbyterian Church San Geronimo	169-101-21	1.2	6001 Sir Francis Drake Blvd, San Geronimo	SF5/R1-B2	13	No	0	15	0	15	**Meets Criteria #2** Existing Use - Religious center (parking lot only)
Underutilized Sites											
Residential next to Forest Knolls Trailer Park	168-131-04	6.5	6760 Sir Francis Drake	SF3/RA-B4	11	No	0	0	8	8	**Meets Criteria #4, 5, 7**

Board of Supervisor District, Strategy, and Site Name	APN	Acres (Develop-able)	Address	Existing GP/Zoning	Density Allowance (du/ac)	Used in Previous HE?	Housing Units by RHNA Income Categories				Criteria and Status
							Lower	Moderate	Above Moderate	Total	
			Boulevard, Forest Knolls								Existing Use - Rural residential lot sf detached, built 1953; Building-to-Land Value Ratio: 1.25
Public Sites											
Nicasio Corporation Yard - Marin County	121-050-34	13.9 (2.2)	5600 Nicasio Valley Road, Nicasio	AG1/ARP-60	20	No	16	0	0	16	**Meets Criteria #2, 3** Existing Use – vacant portion of County corporation yard Pre-development study already underway
Woodacre Fire Station	172-111-01	0.4	33 Castle Rock, Woodacre	SF5/R1-B2	4	No	0	10	0	10	**Meets Criteria #3, 5** Existing Use - Fire station, built 1940s
	172-111-02	0.8	33 Castle Rock, Woodacre	SF5/R1-B2	4	No	0	0	0	0	Existing Use - Fire station, built 1940s (facilities to remain)
	172-104-02	1.4	33 Castle Rock, Woodacre	SF5/R1-B2	4	No	0	0	0	0	Existing Use - Fire station facility (access road to remain)
Southern Coastal West Marin (Stinson Beach, Bolinas, Muir Beach)											
Credit											
Aspen Lots	192-102-22	0.2	430 Aspen Rd, Bolinas	C-SF5/C-RA-B2	0	No	2	0	0	2	**Meets Criteria #4, 5, 7** Existing Use - Estate Lot SF, detached; built 1971; Building-to-Land Value Ratio: 0.61
Downtown Project	193-061-03	1.8	31 Wharf Rd, Bolinas	C-SF5/C-RA-B2	0	No	9	0	0	9	**Meets Criteria #4, 7** Existing Use - Residential common area; Building-to-Land Value Ratio: 0.00
Overlook Lots	192-061-14	0.5	530 Overlook Dr, Bolinas	C-SF5/C-RA-B2	0	No	2	0	0	2	**Meets Criteria #2, 7** Existing Use – Vacant Building-to-Land Value Ratio: 0.00

Board of Supervisor District, Strategy, and Site Name	APN	Acres (Develop-able)	Address	Existing GP/Zoning	Density Allowance (du/ac)	Used in Previous HE?	Housing Units by RHNA Income Categories				Criteria and Status
							Lower	Moderate	Above Moderate	Total	
Underutilized Sites											
Stinson Beach Underutilized Residential	195-193-15	0.3	128 Calle Del Mar, Stinson Beach	C-SF6/C-R1	7	No	0	0	2	2	**Meets Criteria #4, 5, 7** Existing Use - Small lot sf detached, built 1922; Building-to-Land Value Ratio: 0.55
	195-193-18	0.04	129 Calle Del Mar, Stinson Beach	C-SF6/C-R1	7	No	0	0	1	1	**Meets Criteria #4, 5, 7** Existing Use - Very small lot sf detached, built 1922; Building-to-Land Value Ratio: 0.50
Stinson Beach Commercial	195-193-35	0.3	3422 State Route 1, Stinson Beach	C-NC/C-VCR	16	No	0	0	5	5	**Meets Criteria #3, 4** Existing Use - Non urban civic
Vacant Sites											
Stinson Beach Community Center - Vacant	195-211-05	0.9	10 Willow Ave, Stinson Beach	C-SF6/C-R1	10	No	0	0	5	5	**Meets Criteria #2**
Other [4]- West Marin											
School Sites											
Shoreline Unified School District	102-080-19	2.1	Shoreline Highway, Tomales	C-SF3/C-RSP-1.6	20	No	35	0	0	35	**Meets Criteria #2** Existing Use - Vacant school property
	102-080-20	0.4	Shoreline Highway, Tomales	C-SF3/C-RSP-1.6	20	No	9	0	0	9	**Meets Criteria #2** Existing Use - Vacant school property
Tomales Joint Union High School District	102-080-10	0.7	State Route 1, Tomales	C-SF3/C-RSP-1.6	20	No	0	14	0	14	**Meets Criteria #2** Existing Use - Vacant school property

[4] Sites that did not fall within the boundaries of CDPs within unincorporated communities in West Marin (Northern Costal West Marin, Central Coastal West Marin, The Valley, or Southern Coastal West Marin) but are located in West Marin.

Board of Supervisor District, Strategy, and Site Name	APN	Acres (Develop-able)	Address	Existing GP/Zoning	Density Allowance (du/ac)	Used in Previous HE?	Housing Units by RHNA Income Categories				Criteria and Status
							Lower	Moderate	Above Moderate	Total	
Religious Sites											
Olema Catholic Church	166-181-01	3.6	10189 State Route 1, Olema	C-NC/C-VCR	20	No	20	0	0	20	**Meets Criteria #2** Existing Use - Religious center (Parking Lot only)
Underutilized Sites											
Olema Underutilized	166-202-01	1.0	10002 State Route 1, Olema	C-NC/C-VCR	10	No	0	10	0	10	**Meets Criteria #4, 5, 7** Existing Use -Low intensity strip commercial, built 1881; Building-to-Land Value Ratio: 0.96
Olema Underutilized	166-213-01	0.5	9870 State Route 1, Olema	C-NC/C-VCR	10	No	0	0	5	5	**Meets Criteria #4, 5, 7** Existing Use -Low intensity strip commercial, built 1900; Building-to-Land Value Ratio: 0.80
Olema Underutilized	166-213-02	1.0	9840 State Route 1, Olema	C-NC/C-VCR	10	No	0	10	0	10	**Meets Criteria #4, 5, 7** Existing Use -Rural residential lot SF detached, built 1915; Building-to-Land Value Ratio: 0.29
Olema Underutilized	166-202-04	1.1	9950 Sir Francis Drake Blvd, Olema	C-NC/C-VCR	10	No	0	11	0	11	**Meets Criteria #4, 5, 7** Existing Use -Low intensity strip commercial; built 1881; Building-to-Land Value Ratio: 0.96
Central Marin											
Santa Venetia/Los Ranchitos											
Religious Sites											
St. Vincent's School for Boys	155-011-29	20.2	St. Vincent Dr, Santa Venetia	PD/A2	20	4th & 5th	0	0	0	0	**Meets Criteria #1, 2** Developer/Property Owner Interest Existing Use – Vacant/Agricultural
	155-011-28	74.0	St. Vincent Dr, Santa Venetia	PD/A2	20	4th & 5th	0	0	0	0	
	155-011-30	221.0 (34.0)	St. Vincent Dr, Santa Venetia	PD/A2	20	4th & 5th	440	0	240	680	

Board of Supervisor District, Strategy, and Site Name	APN	Acres (Develop-able)	Address	Existing GP/Zoning	Density Allowance (du/ac)	Used in Previous HE?	Housing Units by RHNA Income Categories				Criteria and Status
							Lower	Moderate	Above Moderate	Total	
Church of Jesus Christ	180-272-03	5.4 (1.2)	220 N San Pedro Rd, Santa Venetia	SF5/A2-B2	30	No	35	0	0	35	**Meets Criteria #2** Existing Use - Religious center (Parking Lot only)
Congregation Rodef Shalom Marin	180-281-34	2.9	170 N San Pedro Rd, Santa Venetia	SF5/A2-B2	20	No	0	13	0	13	**Meets Criteria #2** Existing Use - Religious center (parking lot only)
School Sites											
Bernard Osher Marin Jewish Community Center	180-281-35	1.9	180 N San Pedro Rd, Santa Venetia	SF5/A2-B2	30	No	10	0	0	10	**Meets Criteria #2** Existing Use – Religious center (Parking Lot only)
	180-281-21	2.5	200 N San Pedro Rd, Santa Venetia	SF5/A2-B2	30	No	13	0	0	13	**Meets Criteria #2** Existing Use - Religious center (Parking Lot only)
	180-281-25	1.7	210 N San Pedro Rd, Santa Venetia	OC/AP	30	No	13	0	0	13	**Meets Criteria #2** Existing Use - Religious center (Parking Lot only)
	180-281-34	2.9	170 N San Pedro Rd, Santa Venetia	SF5/A2-B2	30	No	0	13	0	13	**Meets Criteria #2** Existing Use - Religious center (parking lot only)
McPhail School	180-151-18	4.3	1565 Vendola Dr, Santa Venetia	PF-SF6/PF-RSP-4.36	30	No	0	0	33	33	**Meets Criteria #1** Property Owner Interest Existing Use - Closed School
	180-161-09	1.0	N San Pedro Rd, Santa Venetia	PF-SF6/PF-RSP-4.36	0	No	0	0	0	0	Existing Use - Closed school
	180-161-10	4.3	N San Pedro Rd, Santa Venetia	PF-SF6/PF-RSP-4.36	0	No	0	0	0	0	Existing Use - Closed school
Old Gallinas Children Center	180-123-01	7.7	251 N San Pedro Rd, Santa Venetia	PF-SF6/PF-RSP-4.36	30	No	50	0	0	50	**Meets Criteria #2, 3** Existing Use - Closed school (with ball field to remain)
Vacant											
Vacant Santa Venetia	180-171-32	1.1	180-171-32 (N San Pedro Rd), Santa Venetia	SF5/A2-B2	2	No	0	0	2	2	**Meets Criteria #2**
Outnumbered2, LLC	180-261-10	27.9	Oxford Drive, Santa Venetia	SF5/A2-B2	4	No	0	0	4	4	**Meets Criteria #1**

Board of Supervisor District, Strategy, and Site Name	APN	Acres (Develop-able)	Address	Existing GP/Zoning	Density Allowance (du/ac)	Used in Previous HE?	Housing Units by RHNA Income Categories				Criteria and Status
							Lower	Moderate	Above Moderate	Total	
Vacant Santa Venetia	179-332-19	1.0	179-332-19 (Edgehill Way), Santa Venetia	SF6/R1	3	No	0	0	3	3	**Meets Criteria #2**
Vacant Bayhills Drive	180-333-01	1.5	Bayhills Drive, Santa Venetia	PR/RMP-1	4	No	0	0	5	5	**Meets Criteria #2**
Kentfield/Greenbrae											
School Sites											
College of Marin Parking Lot	071-132-11	0.8	Sir Francis Drake Blvd, Kentfield	PF/PF	30	No	21	0	0	21	**Meets Criteria #1, 2** Developer/Property Owner Interest Existing Use–Parking Lot; combined with College of Marin Commercial Frontage site below
	071-132-12	0.3		PF/PF	30	No	7	0	0	7	
	074-092-11	0.2		PF/PF	20	No	3	0	0	3	
College of Marin Parking Lot	074-181-18	2.7	139 Kent Ave, Kentfield	PF/PF	20	No	48	0	0	48	
	074-092-17	0.2		PF/PF	20	No	2	0	0	2	
Underutilized Sites											
College of Marin (Commercial Frontage)	074-031-56	0.2	937 Sir Francis Drake Blvd, Kentfield	NC/RMPC	30	No	0	10	0	10	**Meets Criteria #4, 5, 7** Existing Use - Low intensity strip commercial, built 1943; Building-to-Land Value Ratio: 0.00
	074-031-58	0.1	941 Sir Francis Drake Blvd, Kentfield	NC/RMPC	30	No	0	5	0	5	**Meets Criteria #4, 5, 7** Existing Use - Low intensity strip commercial, built 1954; Building-to-Land Value Ratio: 0.00
	074-031-60	0.1	939 Sir Francis Drake Blvd, Kentfield	NC/RMPC	30	No	0	10	0	10	**Meets Criteria #4, 5, 7** Existing Use - Low intensity strip commercial, built 1951; Building-to-Land Value Ratio: 0.00
Kentfield Commercial Underutilized	074-031-54	0.1	923 Sir Francis Drake Blvd, Kentfield	NC/RMPC	30	No	0	4	0	4	**Meets Criteria #4, 5** Existing Use - Low intensity strip commercial, built 1913

Board of Supervisor District, Strategy, and Site Name	APN	Acres (Develop-able)	Address	Existing GP/Zoning	Density Allowance (du/ac)	Used in Previous HE?	Housing Units by RHNA Income Categories				Criteria and Status
							Lower	Moderate	Above Moderate	Total	
	074-031-65	0.3	921 Sir Francis Drake Blvd, Kentfield	NC/RMPC	30	No	0	6	0	6	**Meets Criteria #4, 7** Existing Use - Low intensity strip commercial; Building-to-Land Value Ratio: 0.32
Kentfield Commercial Underutilized	074-031-68	0.2	935 Sir Francis Drake Blvd, Kentfield	NC/RMPC	30	No	0	5	0	5	**Meets Criteria #4, 5, 7** Existing Use - Low intensity strip commercial, built 1950; Building-to-Land Value Ratio: 1.00
	074-031-69	0.1	Sir Francis Drake Blvd, Kentfield	NC/RMPC	30	No	0	3	0	3	**Meets Criteria #4, 7** Existing Use - Large format standalone commercial; Building-to-Land Value Ratio: 0.00
Sloat Garden Center	071-191-47	1.1	700 Sir Francis Drake Blvd, Kentfield	SF6/R1	30	No	26	0	0	26	**Meets Criteria #4, 5, 7** Existing Use - Large format standalone commercial; built 1946 Building-to-Land Value Ratio: 0.17
	071-191-48	0.2	700 Sir Francis Drake Blvd, Kentfield	SF6/R1	30	No	5	0	0	5	**Meets Criteria #4, 7** Existing Use - Large format standalone commercial; Building-to-Land Value Ratio: 0.00
Kentfield Commercial Underutilized	074-031-39	0.3	929 Sir Francis Drake Blvd, Kentfield	NC/RMPC	30	No	0	8	0	8	**Meets Criteria #4** Existing Use - Low intensity strip commercial, built 1979; Building-to-Land Value - 2.96; Floor Area Ratio: 0.80
Kentfield Commercial Underutilized	074-031-45	0.2	907 Sir Francis Drake Blvd, Kentfield	NC/RMPC	30	No	0	5	0	5	**Meets Criteria #4** Existing Use - Low intensity strip commercial, built 1975; Building-to-Land Value - 1.89; Floor Area Ratio: 0.58
Kentfield Commercial Underutilized	074-031-61	0.3	913 Sir Francis Drake Blvd, Kentfield	NC/RMPC	30	No	0	7	0	7	**Meets Criteria #4, 5, 7** Existing Use - Low intensity strip commercial, built 1957; Building-to-Land Value - 1.29
Kentfield Commercial Underutilized	074-031-63	0.1	Sir Francis Drake Blvd, Kentfield	NC/RMPC	30	No	0	4	0	4	**Meets Criteria #2, 4** Vacant; Existing Use - Low intensity strip commercial

Board of Supervisor District, Strategy, and Site Name	APN	Acres (Develop-able)	Address	Existing GP/Zoning	Density Allowance (du/ac)	Used in Previous HE?	Housing Units by RHNA Income Categories				Criteria and Status
							Lower	Moderate	Above Moderate	Total	
Kentfield Commercial Underutilized	074-031-74	0.2	943 Sir Francis Drake Blvd, Kentfield	NC/RMPC	0	No	0	5	0	5	**Meets Criteria #4, 7** Existing Use - Low intensity strip commercial, built 1976; Building-to-Land Value Ratio: 1.09
Kentfield Commercial Underutilized	074-031-75	0.7	901 Sir Francis Drake Blvd, Kentfield	NC/RMPC	30	No	18	0	0	18	**Meets Criteria #4, 7** Existing Use - Low intensity strip commercial; Building-to-Land Value Ratio: 1.66
Kentfield Commercial Underutilized	074-031-77	0.2	911 Sir Francis Drake Blvd, Kentfield	NC/RMPC	30	No	0	6	0	6	**Meets Criteria #4, 7** Existing Use - Low intensity strip commercial; Building-to-Land Value Ratio: 1.00
25 Bayview (Kentfield)	022-071-01	0.4	25 Bayview Rd, Kentfield	MF3/RMP-6	8	No	0	0	3	3	**Meets Criteria #4, 5, 7** Existing Use - Estate lot sf detached, built 1910; Building-to-Land Value Ratio: 0.29
Religious Sites											
St. Sebastian Church (Kentfield Catholic Church)	022-010-21	2.4	215 Bon Air Rd, Kentfield	PF-SF5/R1-B2	10	No	0	14	0	14	**Meets Criteria #2** Existing Use – Religious center (parking lot only)
Other-[5] Central Marin											
Credit											
Albion Monolith	018-087-13	0.5	33 Albion St, California Park	MF3/RMP-9	0	No	0	0	0	0	**Meets Criteria #4, 5, 7** Existing Use - Rural residential lot SF detached; built 1938; Building-to-Land Value Ratio:0.34
	018-087-14	1.2	37 Albion St, California Park	MF3/RMP-9	0	No	1	0	8	9	**Meets Criteria #4, 5, 7** Existing Use - Rural residential lot SF detached; built 1930; Building-to-Land Value Ratio: 0.16

[5] Sites that did not fall within the boundaries of CDPs within unincorporated communities in Central Marin (Santa Venetia/ Los Ranchitos or Kentfield/Greenbrae) but are in the Central Marin area.

Board of Supervisor District, Strategy, and Site Name	APN	Acres (Develop-able)	Address	Existing GP/Zoning	Density Allowance (du/ac)	Used in Previous HE?	Housing Units by RHNA Income Categories				Criteria and Status
							Lower	Moderate	Above Moderate	Total	
San Quentin Adjacent Vacant Property	018-152-12	55.2	E Sir Francis Drake Blvd, San Quentin	PF/A2-B2	0	No	115	115	0	230	**Meets Criteria #2** Existing Use - Non-urban civic, vacant
Vacant Sites											
Cal Park	018-086-17	0.2	Woodland Ave, California Park	MF2/RSP-4	30	4th	0	0	4	4	**Meets Criteria #2** GP Housing Overlay
	018-086-18	0.7	Woodland Ave, California Park	MF2/RSP-4	30	4th	0	0	17	17	**Meets Criteria #2** GP Housing Overlay
	018-075-28	0.9	Woodland Ave, California Park	MF2/RSP-4	30	4th	0	0	15	15	**Meets Criteria #2** GP Housing Overlay
	018-074-16	1.9	Woodland Ave, California Park	MF2/RSP-4	30	No	25	0	0	25	**Meets Criteria #2**
	018-081-04	1.3	Auburn St, California Park	MF2/RSP-4	30	No	0	0	24	24	**Meets Criteria #2**
	018-083-01	0.1	Auburn St, California Park	MF2/RSP-4	30	No	0	0	1	1	**Meets Criteria #2**
	018-085-23	1.0	Auburn St, California Park	MF2/RSP-4	30	No	0	0	17	17	**Meets Criteria #2**
	018-083-09	0.4	Auburn St, California Park	MF2/RSP-4	30	No	0	0	2	2	**Meets Criteria #2**
	018-082-13	0.5	Auburn St, California Park	MF2/RSP-4	30	No	0	0	3	3	**Meets Criteria #2**
	018-084-12	01.2	Auburn St, California Park	MF2/RSP-4	30	No	0	0	2	2	**Meets Criteria #2**
Lucas Valley Environs Vacant	164-280-35	54.2 (1.7)	1501 Lucas Valley Road, Lucas Valley Environs	AG1/A60	15	No	0	0	26	26	**Meets Criteria #2**
Karuna	177-220-10	10.8	1 Sacramento Ave, Sleepy Hollow	MF2/RMP-1.0	1	No	0	0	10	10	**Meets Criteria #2**
Underutilized Sites											

Board of Supervisor District, Strategy, and Site Name	APN	Acres (Develop-able)	Address	Existing GP/Zoning	Density Allowance (du/ac)	Used in Previous HE?	Housing Units by RHNA Income Categories				Criteria and Status
							Lower	Moderate	Above Moderate	Total	
Sacramento/San Anselmo Properties	177-203-03	0.7	68 Sacramento Ave, San Anselmo	SF6/R1	30	No	0	0	16	16	**Meets Criteria #4, 7** Existing Use – Apartment; Building-to-Land Value Ratio: 1.53
	177-203-04	0.8	404 San Francisco Blvd, San Anselmo	SF6/R1	30	No	13	0	5	18	**Meets Criteria #4, 7** Existing Use – Multiple SF detached units; Building-to-Land Value Ratio: 1.16
	177-220-41	0.3	San Francisco Blvd, San Anselmo	SF6/R1	30	No	7	0	0	7	**Meets Criteria #2** Existing Use – Vacant
Sacramento/San Anselmo Properties	177-203-09	0.6	60 Sacramento Ave, San Anselmo	SF6/R1	30	No	0	0	23	23	**Meets Criteria #4, 5, 7** Existing Use – Rural residential lot SF detached; built 1925; Building-to-Land Value Ratio: 0.58
Religious Sites											
Subud California	177-202-08	3.0	100 Sacramento Ave, Sleepy Hollow	PR/RMP-0.1	2	No	0	4	0	4	**Meets Criteria #2, 7** Existing Use - Religious center (parking lot only); Building-to-Land Value Ratio: 1.07
Commercial Mixed Use Sites											
Oak Manor Commercial Center	174-011-33	1.1	2410 Sir Francis Drake Blvd, Unincorporated Fairfax	GC/C1	23	4th & 5th	25	0	0	25	**Meets Criteria #4, 5, 7** Existing Use - Low intensity strip mall; built 1965; Building-to-Land Value Ratio: 1.13
	174-011-36	0.5	2400 Sir Francis Drake Blvd, Unincorporated Fairfax	GC/C1	23	4th & 5th	11	0	0	11	**Meets Criteria #4, 7** Existing Use - Low intensity strip mall; Building-to-Land Value Ratio: 0.38
School Sites											
San Domenico School	176-300-30	522.4 (2.4)	1500 Butterfield Rd, Sleepy Hollow	PR/RMP-0.1	30	No	50	0	0	50	**Meets Criteria #1, 7** Property owner interest; built 1964

Board of Supervisor District, Strategy, and Site Name	APN	Acres (Develop-able)	Address	Existing GP/Zoning	Density Allowance (du/ac)	Used in Previous HE?	Housing Units by RHNA Income Categories				Criteria and Status
							Lower	Moderate	Above Moderate	Total	
Southern Marin											
Strawberry											
Vacant Sites											
North Knoll Rd/Saint Thomas Dr	034-012-26	5.9	Knoll Rd, Strawberry	PR/RMP-0.2	16	No	0	8	48	56	**Meets Criteria #2**
	034-061-09	0.6	Knoll Rd, Strawberry	PR/RMP-0.2	16	No	0	0	3	3	**Meets Criteria #2**
Credit											
North Coast Seminary	043-261-25	48.4	201 Seminary Dr, Strawberry	MF2/RMP-2.47	0	4th	0	0	49	49	**Meets Criteria #1, 5, 7** Existing Use - Non closed seminary college , built 1959; Building-to-Land Value Ratio: 0.04
	043-261-26	25.1	300 Storer Dr, Strawberry	MF2/RMP-2.47	0	4th	0	0	40	40	Existing Use - Non urban civic; Building-to-Land Value Ratio: 0.28
Underutilized Sites											
Strawberry Commercial (one owner)	043-151-03	0.2	670 Redwood Hwy Frontage Rd, Strawberry	GC/H1	30	No	0	0	6	6	**Meets Criteria #4, 5, 7** Existing Use - Office park low, built 1939; Building-to-Land Value Ratio: 0.86
	043-151-09	0.3	680 Redwood Hwy Frontage Rd, Strawberry	GC/H1	30	No	0	0	7	7	**Meets Criteria #4, 5, 7** Existing Use - Motel, built 1944; Building-to-Land Value Ratio: 0.91
Strawberry Commercial (one owner)	043-151-02	0.3	664 Redwood Hwy Frontage Rd, Strawberry	GC/H1	30	No	0	0	9	9	**Meets Criteria #4, 7** Existing Use - Motel, built 1977; Building-to-Land Value Ratio: 0.51
	043-151-31	1.5	690 Redwood Hwy Frontage Rd, Strawberry	GC/H1	30	No	0	0	38	38	**Meets Criteria #4, 7** Existing Use -Low intensity strip commercial, built 1997; Building-to-Land Value Ratio: 0.07

Board of Supervisor District, Strategy, and Site Name	APN	Acres (Develop-able)	Address	Existing GP/Zoning	Density Allowance (du/ac)	Used in Previous HE?	Housing Units by RHNA Income Categories				Criteria and Status
							Lower	Moderate	Above Moderate	Total	
Commercial Center Mixed Use Sites											
Strawberry Village Center (North of Belvedere Dr)	043-321-03	9.2	800 Redwood Hwy Frontage Rd, Strawberry	GC/RMPC	30	No	28	0	0	28	**Meets Criteria #2** Existing Use - Grocery store, parking area; GP Housing Overlay
Strawberry Village Center (South of Belvedere Dr)	043-151-30	3.9	750 Redwood Hwy Frontage Rd, Strawberry	GC/RMPC	30	No	72	0	0	72	**Meets Criteria #4, 7** Existing Use – Commercial center (excludes In-N-Out); Building-to-Land Value Ratio: 0.38
Public Sites											
Strawberry Recreation District Site	043-361-54	3.1	Redwood Hwy Frontage Rd, Strawberry	MF4/RMP-12.1	20	No	0	0	46	46	**Meets Criteria #2, 3** Existing Use - Vacant public property
Tam Valley (Tamalpais-Homestead Valley)											
Underutilized Sites											
Jack Krystal Hotel Parcel Site	052-227-09	2.2	260 Redwood Hwy Frontage Rd, Almonte	RC/BFC-RCR	30	No	0	0	36	36	**Meets Criteria #4, 7** Existing Use -Low intensity strip commercial; Building-to-Land Value Ratio- 0.01
Credit											
150 Shoreline	052-371-03	0.5	150 Shoreline Hwy, Strawberry	GC/CP	0	4th	0	0	10	10	**Meets Criteria #2** Existing Use -Vacant
	052-371-04	0.9	150 Shoreline Hwy, Strawberry	GC/CP	0	4th					**Meets Criteria #4, 5, 7** Existing Use -Low intensity strip commercial, built 1971; Building-to-Land Value 2.37
	052-371-06	0.3	150 Shoreline Hwy, Strawberry	GC/CP	0	4th					**Meets Criteria #4** Existing Use -Low intensity strip commercial
	052-371-07	0.3	150 Shoreline Hwy, Strawberry	GC/CP	0	4th					**Meets Criteria #4** Existing Use -Low intensity strip commercial, built 1975; Building-to-Land Value 3.35

Board of Supervisor District, Strategy, and Site Name	APN	Acres (Develop-able)	Address	Existing GP/Zoning	Density Allowance (du/ac)	Used in Previous HE?	Housing Units by RHNA Income Categories				Criteria and Status
							Lower	Moderate	Above Moderate	Total	
Underutilized Sites											
Holiday Inn Mill Valley	052-371-09	3.1	160 Shoreline Highway, Strawberry	GC/CP	30	No	72	0	0	72	**Meets Criteria #4, 5, 7** Existing Use - Motel, built 1972; Building-to-Land Value Ratio: 0.62
Religious Sites											
Peace Lutheran Church	052-062-05	3.7	205 Tennessee Valley Rd, Tamalpais	SF6/RA-B1	20	No	20	0	0	20	**Meets Criteria #2, 5** Existing Use – Religious center (parking lot only); built 1959
Public Sites											
Tam Junction State Vacant Lot	052-041-27	0.5	Shoreline Hwy, Tamalpais	MF4.5/RMP-12.45	30	4th	0	12	0	12	**Meets Criteria #2, 3** Existing Use - Vacant State property
Marin City											
Religious Sites											
Cornerstone Community Church of God	052-140-38	0.8	626 Drake Ave, Marin City	NC/RMPC	5	No	0	4	0	4	**Meets Criteria #2** Existing Use – Religious center (parking lot only), built 1988
Commercial Center Mixed Use Sites											
Marin Gateway Center	052-490-08	20.1 (5.0)	190 Donahue St, Marin City	GC/CP	20	No	0	50	50	100	**Meets Criteria #4, 6** Existing Use – Low intensity strip commercial; GP Housing Overlay; Building-to-Land Value – 1.67; Floor Area Ratio: 0.20
Credit											
825 Drake	052-112-03	1.0	825 Drake Ave, Marin City	MF4.5/RMP-34	0	No	74	0	0	74	**Meets Criteria #4, 5** Existing Use - Large format standalone commercial; built 1967
Vacant Sites											
Donahue Highlands (formerly LiBao)	052-140-33	49.2 (24.6)	Off Donahue St., Marin City	PR/RMP-0.5	1	No	0	0	25	25	**Meets Criteria #2**
School Sites											

Board of Supervisor District, Strategy, and Site Name	APN	Acres (Develop-able)	Address	Existing GP/Zoning	Density Allowance (du/ac)	Used in Previous HE?	Housing Units by RHNA Income Categories				Criteria and Status
							Lower	Moderate	Above Moderate	Total	
MLK Academy School Site	052-140-39	8.4	610 Drake Ave, Marin City	PF/PF	11	No	0	63	0	63	**Meets Criteria #3** Elementary School
Other[6] - Southern Marin											
Vacant Sites											
Pan Pac Ocean Site	034-012-21	1.6	Eagle Rock Rd, Strawberry	PR/RMP-0.2	2	No	0	0	3	3	**Meets Criteria #2**
	034-012-27	8.4	Eagle Rock Rd, Strawberry	PR/RMP-0.2	2	No	0	0	17	17	**Meets Criteria #2**
	034-012-28	1.2	Eagle Rock Rd, Strawberry	PR/RMP-0.2	2	No	0	0	2	2	**Meets Criteria #2**
	034-012-29	5.0	Eagle Rock Rd, Strawberry	PR/RMP-0.2	2	No	0	0	10	10	**Meets Criteria #2**
Credit											
									0	0	

Note: Due to constraints such as topography and use of septic, developable acreage and allowable density on some specific sites are adjusted downward.

[6] Sites that did not fall within the boundaries of CDPs within unincorporated communities in Southern Marin (Strawberry, Tam Valley, Marin City) but are in the Southern Marin area.

Non-Vacant Affordable Housing Income Assumptions

Site selection to meet the lower-income RHNA includes both vacant sites and underutilized sites. The sites on the following pages identify in detail the site description for non-vacant affordable housing sites only. All sites chosen are significantly underutilized given their size and location.

Key sites with existing uses that are ripe for redevelopment typically contain older structures and are underutilized given the development potential afforded by the mixed-use development standards. Examples of existing uses include small-scale commercial uses, shopping center parking lots, auto repair shops, underutilized school or public sites, and religious institutions with surface parking lots. Some sites with existing residential uses provide the opportunity for significant capacity increases. The following criteria was used to identify underutilized parcels in mixed-use zones:

- Building-to-land value ration less than 2.00
- Structure built prior to 1980 (and therefore over 42 years of age or older)
- General characteristics such as declining uses or underutilized parking areas

Housing sites that could accommodate the lower income ranges were applied a minimum 30 dwelling unit per acre residential density within the Baylands and City-Centered Corridors. These corridor areas are accessible to community facilities, transit, highways, employment areas, and water and sewer infrastructure. Lower income housing sites within the Inland Rural and Coastal Corridors are located in areas that are serviced by private domestic water wells and on-site septic systems. Housing developments that require septic tanks also require larger land areas for the septic tank drainage fields. Thus, affordable housing sites within the Inland Rural and Coastal areas were applied a 20 dwelling unit per acre residential density to recognize the need of more land for on-site infrastructure services. For example, the Walnut Place affordable housing project, located in Point Reyes Station, includes 24 units built on 1.5-acre property (built density is 17 dwelling units per acre). . A portion of the property land area is devoted to the septic drain field.

Corridors	Residential Density for Lower Income Housing du/ac = dwelling unit per acre
Baylands and City Centered	30 du/ac
Inland Rural and Coastal	20 du/ac

Atherton Corridor (North Novato)

Site Description

This site includes three single-family large lots along Atherton Avenue with each lot ranging in size from four to five acres. Each site includes one single-family home, equestrian facilities, and other accessory structures. Several lots include expansive vacant areas. The properties are surrounded by residential properties.

Site Features

- Large single-family sites
- Some mature trees/vegetation
- Large vacant areas
- Equestrian facilities
- Property slopes to the south minimally

Parcel Size Calculation

The physical constraints to development are minimal due to sloping terrain (five percent slope) on the southern portion of the property, while the front or northern portion of property is generally flat. There are no environmentally sensitive areas on these sites. Therefore, the parcel's net acreage equals the full gross acreage.

APN(S)	143-101-37 143-101-20 143-101-17	**Constraints**	Sloping lot toward on southern portion averaging five percent slope. Remainder of lot is generally flat under two percent slope.
Parcel Acres (Net/Gross)	4.0/4.0 4.8/4.8 5.6/5.6		
Existing Use	Single-family	**Infrastructure**	There are sewer capacity restrictions. Further studies are needed to determine potential impacts to sewer capacity and mitigations needed.
General Plan	SF3		
Zoning	A2-B4		
Maximum Density	20		
Unit Capacity	147		

Bernard Osher Marin Jewish Community Center (Santa Venetia)

Site Description

This site utilizes parking areas for Bernard Osher Marin Jewish Community Center along San Pedro Road, to calculate potential housing units. The site is across the street from Venetia Valley School.

Site Features

- Parking area
- Mature trees/vegetation

Parcel Size Calculation

Only half (50%) of the parking lots was calculated for the net area of the site. Religious facilities were excluded from the analysis.

APN(S)	180-281-21 180-281-25 180-281-35	**Constraints**	There are no physical constraints.
Parcel Acres (Net/Gross)	0.9/1.7 0.9/2.5 0.7/2.0		
Existing Use	Religious institution parking lot	**Infrastructure**	This site has access to existing water and sewer service.
General Plan	OC, SF6		
Zoning	AP, RA		
Maximum Density	30		
Unit Capacity	36		

Church of Jesus Christ of Latter-Day Saints (Santa Venetia)

Site Description

This site contains parking areas for the Church of Jesus Christ along San Pedro Road, just south of Woodoaks Drive.

Site Features

- Parking area wrapping around structure
- Some mature trees and vegetation along parking lot and street edge

Parcel Size Calculation

Only half (50%) of the parking lots was calculated for net area of the site. Religious facilities were excluded from the analysis.

APN(S)	180-272-03	**Constraints**	There are no physical constraints.
Parcel Acres (Net/Gross)	3.5/5.3		
Existing Use	Religious institution parking lot	**Infrastructure**	This site has access to existing water and sewer service.
General Plan	SF5		
Zoning	A2-B2		
Maximum Density	20		
Unit Capacity	35		

College of Marin - Kent Avenue Site (Kentfield)

Site Description

This three-acre parking lot is located across the street of the College of Marin with access to Kent Avenue. The site is primarily surface parking area with some vegetation and trees on the westernmost portion of the site. The College has expressed interest in building workforce housing for staff.

Site Features

- Parking area
- Adjacent to residential uses
- Mature trees along edges

Parcel Size Calculation

There are no on-site physical constraints, so the majority of the parcel acreage was counted.

APN(S)	074-092-11 074-181-18 074-092-17	**Constraints**	There are no physical constraints.
Parcel Acres (Net/Gross)	3.1/3.1	**Infrastructure**	The site has access to existing water and sewer service. Sewer capacity study likely needed to determine capacity impacts and potential mitigations.
Existing Use	College parking lot		
General Plan	PF		
Zoning	PF		
Maximum Density	20		
Unit Capacity	53		

College of Marin - Sir Francis Drake Boulevard Site (Kentfield)

Site Description

This one-acre parking lot is located across the street of the College of Marin with access to Sir Francis Drake Boulevard. The College has expressed interest in building workforce housing for staff.

Site Features

- Parking area
- Adjacent to residential uses

Parcel Size Calculation

There are no on-site physical constraints, so the majority of the parcel acreage was counted.

APN(S)	071-132-11 071-132-12	**Constraints**	There are no physical constraints.
Parcel Acres (Net/Gross)	1.1/1.1		
Existing Use	College parking lot	**Infrastructure**	The site has access to existing water and sewer service. determine capacity impacts and potential mitigations.
General Plan	PF		
Zoning	PF		
Maximum Density	30		
Unit Capacity	28		

Marin County Juvenile Hall (Lucas Valley)

Site Description

This site, nearly 33 acres in size, is owned by the County of Marin and hosts the Juvenile Hall and Marin County facilities. There are nearly 10 acres on the southern site that are vacant, but is recognized as a recreational amenity by the community. The site is located at the northeast corner of Lucas Valley Road and Lassen Drive.

Site Features

- Juvenile Hall facility
- Jeanette Prandi Children's Center
- Magnolia Park School
- County offices
- Passive recreation field and walking trail
- Miller Creek

Parcel Size Calculation

Miller Creek traverses through the southern portion of the site but has been excluded from the site acres identified for potential housing development. The County will allocate approximately 10 acres for affordable housing development by reorganizing existing or underutilized facilities.

APN(S)	164-640-01	**Constraints**	Miller Creek traverses a portion of the southern site, and the northern sites has minimal slope conditions where no development is anticipated.
Parcel Acres (Net/Gross)	9.9/33.0		
Existing Use	County government facilities and recreational passive field	**Infrastructure**	The site has access to existing water and sewer service. Potential upgrades may be needed for the sewer system.
General Plan	PF		
Zoning	PF		
Maximum Density	30		
Unit Capacity	80		

Grandi Building/Site (Point Reyes Station)

Site Description

This 2.5-acre site includes the vacant Grandi Building (built in 1915), older commercial and industrial structures, and vacant areas. The commercial and industrial buildings were built in the early 1900s.

Site Features

- Grandi Building
- Commercial/industrial buildings
- Retail nursery
- Vacant area
- Industrial Storage

Parcel Size Calculation

Only 50 percent of the site was calculated toward housing development, with the intent of rehabilitating upper floor of the Grandi Building for affordable housing. It was assumed that the commercial buildings will remain.

APN(S)	119-234-01	**Constraints**	There are no physical constraints. The Grandi Building is over 100 years old and will require rehabilitation to accommodate residential units on the upper floor.
Parcel Acres (Net/Gross)	1.3/2.5		
Existing Use	Vacant building and commercial businesses	**Infrastructure**	There may be a deficiency of acreage on site to support septic drain field for 25 units.
General Plan	C-NC		
Zoning	C-VCR-B2		
Maximum Density	20		
Unit Capacity	21		

Kentfield Commercial Underutilized Site (Kentfield)

Site Description

This site is located along Sir Francis Drake Boulevard on a slightly sloping property. Each two-story building is built on two different flat areas of the property. The buildings have a building-to-land value ratio (BLVR) of 1.7, and are in good condition but are showing sign s of age. The low BLVR indicates no recent reinvestments to the property.

Site Features

- Two office buildings
- Rear of property adjoins the Corte Madera Creek.
- Mature trees along creek
- Site is adjacent to multi-family units

Parcel Size Calculation

The existing buildings could be rehabilitated and converted to affordable housing. Or the existing buildings can be demolished, and the new affordable housing could be built on the existing footprints to take in account the slight terrain various on site. The site has a six percent slope measured from the center to rear of the property.

APN(S)	074-031-75	**Constraints**	Minimal slope conditions.
Parcel Acres (Net/Gross)	0.7/0.7		
Existing Use	Office buildings	**Infrastructure**	The site has access to existing water and sewer service.
General Plan	NC		
Zoning	RMPC		
Maximum Density	30		
Unit Capacity	18		

Marinwood Plaza (Marinwood)

Site Description

Marinwood Plaza is an existing shopping center located at Marinwood Avenue and Miller Creek Road. The center consists of two vacant areas, an operating grocery store, and vacant commercial tenant spaces. A dry-cleaning business operating between 1974 and 2005 contaminated the soil and groundwater around the area. The vacant portion of the building has a building-to-land value ratio of 1.6 and was built in the 1960s. The building is showing signs of age and lack of investment, with numerous vacancies of the small retail spaces.

Site Features

- Grocery store; vacant commercial/retail tenant spaces
- Two vacant areas
- Contamination (soil and groundwater)
- Mature trees throughout parking lot

Parcel Size Calculation

The site acres for housing development includes the entire site, except for the grocery store and adjacent parking area. The assumption is that the grocery could remain and continue to serve the community. Of the five-acre site, three acres were identified for housing development.

APN(S)	164-417-70 164-471-64 164-471-69	**Constraints**	Groundwater and soil contamination.
Parcel Acres (Net/Gross)	3.0/4.9	**Infrastructure**	Sewer study indicates no existing capacity restrictions in vicinity, however, as typical for developments, capacity study will likely be needed to determine potential impacts and mitigations.
Existing Use	Commercial shopping center		
General Plan	GC		
Zoning	CP		
Maximum Density	30		
Unit Capacity	125		

Nicasio Corp Yard (Nicasio)

Site Description

The Nicasio Corp Yard, located along Nicasio Valley Road, is owned by the County of Marin, and houses the Public Works Department's facilities and equipment. The site consists of several structures, including a steel warehouse building to store equipment. The site also includes fleet vehicles storage and vacant areas. The site is surrounded by open hillside and creeks and natural drainages.

Site Features

- Vehicle and equipment storage
- Facility structures
- Mature trees along the periphery
- Streams
- Vacant areas

Parcel Size Calculation

The entire site is nearly 14 acres, but the property includes the street, vacant land to the south, and irregular shaped areas to the north, only the most developable areas of the site were included, yielding less than one acre.

APN(S)	121-050-34	**Constraints**	Adjacent creeks
Parcel Acres (Net/Gross)	0.8/13.9	**Infrastructure**	Well investigation needed. Septic investigation needed to confirm whether existing field has capacity or can be expanded and its condition. Streams and potential groundwater and proximity to Nicasio Reservoir will affect where septic can be expanded to. Stream conservation areas will probably cut off the northern area of the parcel from development. Stream conservation area will affect constructable area in the southern area of the property.
Existing Use	County Public Works Storage and Maintenance yard		
General Plan	AG1		
Zoning	ARP-60		
Maximum Density	20		
Unit Capacity	16		

Oak Manor Shopping Center (Unincorporated Fairfax)

Site Description

The Oak Manor Shopping Center consists of a retail center built in 1965 with a building-to-land value ratio of 1.1. The auto repair structure has a building to land value ratio of 0.4. These buildings have not been improved for many years. The uses include a convenience store (7-11), restaurant, and a coin laundromat.

Site Features

- Convenience store
- Vacant commercial/retail tenant spaces
- Two vacant areas
- Contaminated
- Mature trees throughout parking lot

Parcel Size Calculation

Since there are no physical constraints, the entire site acreage was used to calculate housing.

APN(S)	174-011-33 174-011-36	**Constraints**	No physical constraints.
Parcel Acres (Net/Gross)	1.6/1.6	**Infrastructure**	The site has access to existing water and sewer service. Sewer capacity impact study likely will be needed.
Existing Use	Commercial shopping center and automobile repair station		
General Plan	GC		
Zoning	C1		
Maximum Density	23		
Unit Capacity	36		

Lagunitas Upper-Floor Office Conversion (Lagunitas)
7282 Sir Francis Drake Boulevard

Site Description

Located on 7120 Sir Francis Drake Boulevard in Lagunitas, the site includes a two-story building with commercial tenants on the first floor and offices on the second floor. The upper floor could accommodate three small units. Surface parking fronts the street.

Site Features

- Two-story commercial and office building
- Post office
- Vacant land

Parcel Size Calculation

In addition to the building, only a portion of the surrounding site was used to accommodate housing units.

APN(S)	168-192-28	**Constraints**	Slope along the rear of the property
Parcel Acres (Net/Gross)	0.8/1.0	**Infrastructure**	Septic investigation needed to confirm capacity, condition and expansion of existing septic. Septic field location might limit being able to provide 16 housing units.
Existing Use	Religious institution		
General Plan	C-NC		
Zoning	C-VCR		
Maximum Density	20		
Unit Capacity	14		

Old Gallinas Children's Center (Santa Venetia)

Site Description

The site, located at San Pedro Road and Schmidt Lane, is a former elementary school surrounded by residential uses and the San Rafael Tennis Center. The back portion of the property consists of a baseball field and has been identified as a community amenity. The school buildings house a childcare facility.

Site Features

- Childcare buildings (former elementary school buildings)
- Baseball field
- Vacant area
- Playground for childcare facilities

Parcel Size Calculation

The entire site area is 7.7 acres. However, the net acres exclude the ball field and childcare buildings, and only 1.7 acres were used to calculate 50 units on the site at a density of 30 dwelling units per acre.

APN(S)	180-123-01	**Constraints**	No physical constraints.
Parcel Acres (Net/Gross)	1.6/7.7	**Infrastructure**	The site has access to existing water and sewer service.
Existing Use	Former element school with childcare center and baseball field		
General Plan	PF-SF6		
Zoning	PF-RSP-5.8		
Maximum Density	30		
Unit Capacity	50		

Creekside Center Office Complex (Lucas Valley)

Site Description

Creekside Center is located at the northwest corner of Lassen Drive and Lucas Valley Road. The center includes two office buildings that are two story each. The site is adjacent to Miller Creek and includes numerous mature trees throughout the site and parking area. The office buildings have a building-to-land value ratio of 1.4 indicating limited reinvestments to the property. Built in 1979, there no recent physical façade improvements to the buildings. The site is surrounded by single-family homes.

Site Features

- Two, two-story office buildings
- Adjacent to Miller Creek

Parcel Size Calculation

The majority of the site was used to calculate housing units, excluding set back requirements areas along the Miller Creek.

APN(S)	164-481-10	**Constraints**	Miller Creek setback requirements.
Parcel Acres (Net/Gross)	2.4	**Infrastructure**	The site has access to existing water and sewer service. Even though there are no existing capacity restrictions indicated downstream for sanitary sewer, further analysis will most likely be required.
Existing Use	Office buildings		
General Plan	GC		
Zoning	CP		
Maximum Density	30		
Unit Capacity	58		

Sacred Heart Catholic Church (Olema)

Site Description

Sacred Heart Church in Olema is located along Sir Francis Drake Boulevard in Olema. The 3.3-acre site includes a cathedral, parking area, open fields, and several buildings. The site is adjacent to Olema Campground and a post office.

Site Features

- Cathedral building
- Mature trees along property edge
- Parking areas
- Open fields
- Accessory housing and support structures

Parcel Size Calculation

Only 50 percent of the open fields and parking lot were used in identifying area for potential housing development. The entire site, including the cathedral and existing buildings were not used in calculating acres for potential housing development.

APN(S)	166-181-01	**Constraints**	A portion of the site is within the Olema Creek floodplain.
Parcel Acres (Net/Gross)	1.2/3.6	**Infrastructure**	There may be a deficiency of acreage on site to support septic drain field for 24 units.
Existing Use	Religious institution		
General Plan	C-NC		
Zoning	C-VCR		
Maximum Density	20		
Unit Capacity	20		

Peace Lutheran Church (Tam Valley)

Site Description

Peace Lutheran Church is located near the intersection of Shoreline Highway and Tennessee Valley Road. The church facilities are terraced into the hillside.

Site Features

- Church building
- Housing
- Parking areas
- Open fields

Parcel Size Calculation

Only 50 percent of the open fields and parking lot were used in identifying area for potential housing development. The entire site was not used in calculating acres as church buildings and steeper terrain were excluded from the calculation.

APN(S)	052-062-05	**Constraints**	Slope constraints
Parcel Acres (Net/Gross)	1.6/3.7	**Infrastructure**	The site has access to existing water and sewer service. Sewer capacity study may be needed.
Existing Use	Religious institution		
General Plan	SF6		
Zoning	RA-B1		
Maximum Density	20		
Unit Capacity	20		

Saint Cecilia Church (Lagunitas)

Site Description

Saint Cecilia Church in Lagunitas is located along Sir Francis Drake Boulevard. The one-acre site includes a church building, parking area, and an open field. The site is adjacent to single family homes and vacant lots.

Site Features

- Church building
- Mature trees
- Parking areas
- Small open field
- Accessory housing and support structures

Parcel Size Calculation

Only 50 percent of the open fields and parking lot were used in identifying area for potential housing development. The entire site was not used in calculating acres.

APN(S)	168-183-04	**Constraints**	Sloping property
Parcel Acres (Net/Gross)	0.5/1.0	**Infrastructure**	Septic investigation needed to confirm capacity, condition, and expansion of existing septic.
Existing Use	Religious institution		
General Plan	SF4		
Zoning	R1-B3		
Maximum Density	30		
Unit Capacity	16		

Sloat Garden Center (Kentfield)

Site Description

Sloat Garden Center is located in Kentfield at the northwest corner of Sir Francis Drake Boulevard and Wolfe Grade. The site includes a retail nursery center with outdoor plant sales area and building for indoor sales. There are two parking lots. The building was built in 1946 and has a building-to-land value ratio of 0.17. This very low number indicates relatively no recorded improvements to the building in many years.

Site Features

- Nursery building
- Two parking lots
- Retail plant area

Parcel Size Calculation

The site is relatively flat, so all of the acreage of the site was used in calculating units.

APN(S)	071-191-47 074-191-48	**Constraints**	No constraints
Parcel Acres (Net/Gross)	1.3/1.3	**Infrastructure**	This site has access to existing water and sewer service.
Existing Use	Retail Nursery		
General Plan	SF6		
Zoning	R1		
Maximum Density	30		
Unit Capacity	31		

Strawberry Village Shopping Center (Strawberry)

Site Description

The Strawberry Village Center is located off of Highway 101 near the Tiburon Boulevard ramp along Belvedere Drive. This site includes two shopping centers under one ownership, the main shopping center with numerous retail stores, restaurants, and a Safeway grocery store, and a second center to the south of Belvedere Drive within an In-N-Out Burger restaurant, offices, health, banks, and fitness commercial services. The rear portion of the center is heavily constrained by topography. The main building on the southern site was built in 1983 and has building-to-land value ratio of 0.4.

Site Features

- Retail shopping center
- Large surface parking lot

Parcel Size Calculation

For the main Strawberry Village Shopping Center, only a portion of the surface parking lot near Safeway, an 0.74-acre area, was identified for housing while the remaining center was not utilized for housing capacity. The second shopping center, the In-N-Out restaurant and steep terrain was excluded in calculating the potential developable area.

APN(S)	043-321-03 043-151-30	**Constraints**	Slope constraints on southern site
Parcel Acres (Net/Gross)	0.7/10.3 3.9/4.5	**Infrastructure**	This site has access to existing water and sewer service and appears feasible.
Existing Use	Retail shopping center		
General Plan	GC		
Zoning	RMPC		
Maximum Density	30		
Unit Capacity	Two sites: 100		

Sacramento/San Anselmo Properties (Sleepy Hollow)

Site Description

This site consists of four properties with three of the four properties under one ownership. The one ownership site along Sacramento Avenue, consists of two single-family homes with a large vacant rear yard with several matures trees and an accessory structure. One of the homes was built in 1925 with a 0.6 building-to-land value ratio. The three sites along San Francisco Boulevard consists of several single-family homes and a multi-family development, as well as a large vacant area.

Site Features

- Existing underutilized residential uses
- Vacant land area

APN(S)	177-203-09 177-203-03 177-203-04 177-220-41	**Constraints**	There are no physical constraints
Parcel Acres (Net/Gross)	2.4/2.4	**Infrastructure**	This site has access to existing water and sewer service and appears feasible. A study may need to be done to confirm whether there is waste flow from 16 units above flows generated by existing buildings. And if any, would the added flow impact the capacity of sewer that parcels tie in to.
Existing Use	Residential uses		
General Plan	SF6		
Zoning	R1		
Maximum Density	30		
Unit Capacity	64		

Point Reyes Village Barn (Point Reyes Station)

Site Description

The Point Reyes Village Barn consist of a large barn, dirt parking lot, storage area, and a small office building that houses the Marin County Farm Bureau.

Site Features

- Existing underutilized residential uses
- Vacant land area

Parcel Size Calculation

The large barn was excluded in calculating potential housing units. The large vacant dirt field and underutilized office was included in the analysis to yield potential housing.

APN(S)	119-198-05 119-098-04	**Constraints**	There are no physical constraints
Parcel Acres (Net/Gross)	1.5/2.1	**Infrastructure**	Septic investigation needed to confirm capacity, condition, and expansion of existing septic,
Existing Use	Vacant barn, storage area, and office		
General Plan	C-NC		
Zoning	C-VCR-B2		
Maximum Density	20		
Unit Capacity	24		

Point Reyes Village (Point Reyes Station)

Site Description

This site, within the block in Point Reyes Village between 5th Street, B Street, 4th Street, and A Street consists of vacant land used as storage and a commercial building fronting 4th Street. This commercial building was built in 1953 with a 0.7 building-to-land value ratio.

Site Features

- Storage area on dirt area
- Long linear commercial building

Parcel Size Calculation

The entire site was used to calculate units.

APN(S)	119-222-08	**Constraints**	There are no physical constraints
Parcel Acres (Net/Gross)	1.0/1.0	**Infrastructure**	Septic investigation needed to confirm capacity, condition, and expansion of existing septic,
Existing Use	Vacant barn, storage area, and office		
General Plan	C-NC		
Zoning	C-VCR-B2		
Maximum Density	20		
Unit Capacity	17		

Point Reyes Coast Guard Station (Point Reyes Station)

Site Description

The County of Marin has the purchased the 31-acre site former U.S. Coast Guard property at 100 Commodore Webster Drive, formerly home to Coast Guard personnel and their families. No one has lived on the site since the Coast Guard designated it as surplus in 2014. There are 36 townhomes, a 24-room barracks, a dining hall, a kitchen, and several ancillary buildings at the property, which is a half mile east of downtown Point Reyes Station. An affordable housing developer is working on an application for renovation of the existing homes.

Site Features

- 36 townhomes
- 24-room barracks
- Open fields

Parcel Size Calculation

A portion of the gross 31.4 acres were uses to calculate housing units.

APN(S)	119-240-73	**Constraints**	Lagunitas creek floodway.
Parcel Acres (Gross)	31.4	**Infrastructure**	Septic investigation completed and confirmed an area large enough is available. Setbacks needed from Lagunitas Creek for septic.
Existing Use	Former U.S. Coast Guard housing		
General Plan	C-OS		
Zoning	C-OA		
Maximum Density	N/A		
Unit Capacity	50		

San Domenico School (San Anselmo)

Site Description

Most of the 522-acre San Domenico School campus consists of school facilities and steep hillside terrain with natural vegetation. There are a few areas of the school, each over one acre and less than 10 acres, that could allow for housing opportunities. The school adjoins protected open spaces.

Site Features

- School campus facilities and structures
- Mature trees
- Large hillside terrain
- Small vacant areas

Parcel Size Calculation

Several acres within the large campus were used to identify potential housing opportunities. These areas consists of a large overflow surface parking lot and vacant land near the main entrance to the school.

APN(S)	176-300-30	**Constraints**	A large portion of the 500 acres consists of steep terrain and school facilities
Parcel Acres (Net/Gross)	2.0/522.4	**Infrastructure**	This site has access to existing water and sewer service and appears feasible. A study may need to be done to confirm whether there is waste flow from 50 units above anticipated flows generated by the school. And if any, would the added flow impact the capacity of sewer that the parcel ties in to.
Existing Use	Private school		
General Plan	PR		
Zoning	RMP-0.1		
Maximum Density	30		
Unit Capacity	50		

Shoreline Unified School District (Tomales)

Site Description

These two properties are owned by the Shoreline Unified School District off of Main Street in Tomales. The site is vacant with a small area of storage equipment. The site is adjacent to open land and the Tomales Regional History Center, school district bus storage area, and the Catholic Church of the Assumption.

Site Features

- Vacant land area
- Mature tree on edge of property

Parcel Size Calculation

The entire was used in the calculation of housing units.

APN(S)	102-080-19 102-080-20	**Constraints**	There are no physical constraints
Parcel Acres (Net/Gross)	2.5/2.5	**Infrastructure**	Infrastructure feasible for housing development. Well investigation needed.
Existing Use	Vacant land		
General Plan	C-SF3		
Zoning	C-RSP-1.6		
Maximum Density	20		
Unit Capacity	44		

Definitions and Acronyms

Definitions

Net Acres. The net acreage for each candidate site was calculated based on the gross acreage (for all parcels included in the site) minus the acreage deemed partially or completely undevelopable based on existing steep slopes and known environmental constraints. Environmental constraints were determined based on known site information for the parcels where that information was available and other sources.

Gross Acres. Total parcel acreage.

Building-to-Land Value Ratio. The percentage of how much a structure is valued (assessed value) compared to the total land parcel value (asses) on which it is located. It is the total building value as a percentage of the total land value. Lower building-to-land value ratio typically indicates that property has not undergone recent physical improvements recorded by the building department. Higher building-to-land value ratio typically indicates typically indicates recent investments to the physical property.

Density. The number of dwelling units on one acre of net or gross land area.

Existing Use. The use at the time the site was analyzed or viewed.

Non-Vacant Parcel: Non-vacant parcels are all sites which HCD does not consider to be vacant. They include underutilized or developed parcels and sites containing existing structures or established uses. These may include temporary structures associated with an active use (i.e., agricultural greenhouses) or other uses currently operating on the site.

Land Use Categories Acronyms

SF1 = Single-Family 1
SF2 = Single-Family 2
SF3 = Single-Family 3
SF4 = Single-Family 4
PR = Planned Residential
SF5 = Single-Family 5
SF6 = Single-Family 6
MF-2=Multi-Family 2
MF-3=Multi-Family 3
MF-3.5=Multi-Family 3.5
MF-4=Multi-Family 4
MF-4.5=Multi-Family 4.5
GC/MU=General Commercial/Mixed Use
OC/MU=Office Commercial/Mixed Use
MC/MU=Neighborhood Commercial/Mixed Use
RC=Recreational Commercial
I=Industrial

Zoning Acronyms

A60 = Agriculture and Conservation
A2 = Agriculture Limited
A2-B2 = Agriculture Limited
AP = Administrative and Professional
R1 = Residential Single Family
RMP-1 = Residential Multiple Planned
RSP-4 = Residential Single Family Planned
RMP-0.2 = Residential Multiple Planned
RMP-0.1 = Residential Multiple Planned
RMP-0.5 = Residential Multiple Planned
C-R1 = Residential Single Family
RMPC-1 = Residential Commercial Multiple Planned
C-VCR-B2 = Village Commercial Residential
C-RSP-7.26 = Residential Single Family Planned
C-VCR-B1 = Village Commercial Residential
ARP-2 = Agriculture Residential Planned
RMP = Residential Multiple Planned
RMP-6 = Residential Multiple Planned
BFC-RCR = Resort and Commercial Recreation
H1 = Limited Roadside Business
VCR = Village Commercial Residential
VCR-B2 = Village Commercial Residential
C-VCR = Village Commercial Residential
CP = Planned Commercial
PF = Public Facilities
PF-RSP-4.36 = Residential Single Family Planned
PF-RSP-5.8 = Residential Single Family Planned

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